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General Notes about Data Protection

For First-Trans-Late, the protection of your personal data is fundamental. First-Trans-Late is committed to fully complying with all current legislation concerning data protection and security. Our customers can rest assured that we will always protect their privacy and treat their data as strictly confidential.

Please note that you can visit *www.first-trans-late.com* without providing any personal data, such as your name, address, telephone number, e-mail address, etc. Personal data will be collected only as technically necessary and will be saved and used by First-Trans-Late solely with your knowledge and consent. However, a certain amount of personal data will be inevitably required if you wish to send an inquiry or contact First-Trans-Late. You may revoke your consent at any time. (To do so, please contact First-Trans-Late.)

First-Trans-Late collects, saves and uses personal data only in order to provide you with relevant information and for communication purposes. For instance, First-Trans-Late will use your submitted personal data in order to reply to your inquiry. Personal data will never be sold, transferred or made available to third parties in any way whatsoever or for any other reason or purpose.

This privacy policy also provides you with an overview of how data protection is ensured by First-Trans-Late and what kind of data is collected and used for what purpose.

About Data Handling by First-Trans-Late

As mentioned above, you can visit *www.first-trans-late.com* without providing any personal data. By accessing the website, however, some non-personal data may be collected automatically (e.g. about your web browser and operating system, IP address, number of visits and pages accessed, the average length of time spent on this website, etc.).

First-Trans-Late uses such anonymous data (which is not attributable to persons) only for the purpose of analyzing and optimizing the appeal of its website. This, in turn, serves to enhance and refine the services offered. Collected data will never be disclosed to any third parties, neither for commercial nor for non-commercial purposes. Furthermore, these data is never merged with other data sources, but deleted after the statistical analysis. *www.first-trans-late.com* does NOT use cookies and First-Trans-Late does not apply other techniques to track the access behavior of the visitors of this website.

As alterations to this privacy policy may be required due to amendments and legal changes in order to comply with the applicable law, First-Trans-Late kindly requests that you review this privacy policy at regular intervals.

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Privacy Policy acc. to the General Data Protection Regulation (GDPR) - Regulation (EU) 2016/679 -

This website is intended only for information purposes. First-Trans-Late (FTL) will receive personal data only if you are contacting First-Trans-Late directly. FTL uses the data solely internally for managing the communication and business relationship with you and will never pass them on to any third parties unless mandated by law. We do NOT place any cookies on your device. Furthermore, FTL does NOT use any services such as Google Analytics.

1. Name and address of the person responsible for processing the personal data (Art. 13 (1) (a) and (b) GDPR)

First-Trans-Late | Martin Lemmer Heindelstr. 13 | 91056 Erlangen | Germany Tel: +49 9131 5301547 E-mail: <u>office@first-trans-late.com</u> | WWW: <u>www.first-trans-late.com</u> Due to the small size of the company, FTL is under no obligation to appoint a data protection officer.

2. Purposes for which personal data are to be processed and legal basis for processing (Art. 13 (1) (c) GDPR)

The object of First-Trans-Late is the translation, editing and reviewing of texts in various languages and the provision of related services. The main purpose for the collection, processing and use of personal data is to enter into relevant contracts and to fulfill contractual obligations. Secondary purposes include the client administration as well as the support of prospective customers, contract initiation, and internal statistical purposes.

In general, personal data are collected, processed and used for the following groups of people, as far as this is necessary for the fulfillment of the aforementioned purposes:

- Clients: Address / Contact details; contract / billing / payment data; service information
- Suppliers: Address / Contact details; contract / billing data; service information
- Prospective customers: Address / Contact details; service information

Personal data, however, will only be processed if at least one of the following conditions applies:

- The data subject has consented to the processing of his or her personal data for one and/or more specific purposes (Art. 6 (1) GDPR).
- The processing is essential for the performance of a contract of which the data subject is party or in order to take required steps at the request of the data subject prior to concluding a contract (Art. 6 (1) (b) GDPR).
- The processing is necessary for the purposes of complying with legal obligations to which FTL is subject (Art. 6 (1) (c) GDPR).

3. Recipients or categories of recipients of the personal data (Art. 13 (1) (e) and (f) GDPR)

Personal data are used solely internally and passed on only in accordance with legal provisions to:

- Public authorities, if and inasmuch as this is required by law.
- Service providers as vicarious agents, insofar as the data are necessary for the fulfillment of the purposes specified (see 2. above).

Personal data are never transmitted outside the EU or to any international organization.

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4. Storage period of the personal data (Art. 13 (2) (a) GDPR)

Personal data will be duly deleted upon expiry of the legal or contractual retention periods. Personal data, however, not affected by such periods will be deleted once the purposes stated under 2. are no longer valid.

5. Right to information, rectification, and erasure; Right to lodge a complaint (Art. 13 (2) (b) to (d) GDPR)

- Data subjects have the right to obtain information about personal data pertinent to them.
- Data subjects have the right to have any incorrect and/or incomplete personal data corrected.
- Data subjects have the right to have their personal data erased or the use thereof restricted, unless otherwise provided by law (e.g. tax law) or contractual agreement.
- Data subjects have the right to revoke their consent to the processing pursuant to Art. 6 (1)
 (a) GDPR, unless otherwise provided by law (e.g. tax law) or contractual agreement.

All these options are provided free of charge and require only a simple notification in text form.

Moreover, data subjects have the right to lodge a complaint with a supervisory authority. The competent authority is the <u>Bavarian State Commissioner for Data Protection (BayLfD)</u>.

6. Obligation to provide data (Art. 13 (2) (e) GDPR)

Providing personal data may be legally or contractually required, or a requirement necessary to enter into a contract. In such a case, the data subject is obliged to provide the personal data. Failure to provide the requested personal data may render it impossible for First-Trans-Late to conclude a contract with the data subject.

7. Automated decision-making (Art. 13 (2) (f) GDPR)

First-Trans-Late does not use any form of automated decision-making, including profiling, as defined by Art. 22 (1) and (4) GDPR.

8. Additional information

By visiting one of our pages, as everywhere on the Internet, anonymous data is automatically acquired that cannot be assigned to a person. These data are automatically transmitted by the visitor's browser and collected by our provider in a log file (browser type and version, operating system, URI of the previously visited page, host name or IP address of your computer or router, as well as date and time of access). The sole purpose of this data collection is the statistical evaluation of our website and the defense against hackers and other threats. All these data will never be merged with other data sources or shared with third parties. Moreover, the data will be deleted as required by law as soon as they are no longer required for the purposes described herein.

First-Trans-Late does NOT use analysis tools (such as Google Analytics). There is neither a contact form nor any ad or tracker on the pages of FTL. Moreover, this website offers no payment options and does NOT place any cookies on your device.

Amended in May 2018.