

Karen Rutland

BA, Dip Trans (IoLET), MCIL, MITI

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Privacy Policy

I, Karen Rutland, treat the privacy of my clients and colleagues very seriously and take appropriate security measures to safeguard your privacy.

This Privacy Policy outlines when, what and why I collect personal data, how I use it, the limited conditions under which I may disclose it to others, and how I keep it secure.

If you have any questions regarding this Policy and my privacy practices or to request a copy of the data I hold please contact me:

Karen Rutland
35 Romsey Close
Basingstoke
RG24 9HB
United Kingdom
+44 (0)1256 353491
info@karenrutland.co.uk

1. Who manages the data?

1.1. Data processor

Those appointed to process, or use, the data on behalf of the data controller.

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1.2. Data controller

Those collecting or storing personal data and requesting the processing of the information.

My client

Karen Rutland

I do not outsource any projects to third parties.

2. The legal basis on which I collect any personal data

I do not collect any personal data about my clients unless it is required for the **performance of my contract** with you, or you have given me your **consent**.

Such data is usually provided to me by you when you approach me with a request to deal with a translation, editing or abstraction project.

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The legal basis for processing your data is to **perform the services** you request or to take necessary steps prior to fulfilling that request and **complying with legal requirements**.

Visitors to my website are not obliged to provide personal data.

Nevertheless, anyone interested in my services can contact me via the contact information provided, and some personal data has to be collected in order to establish communication.

I may hold the commercial details of colleagues whom I have met during networking events. This data is provided to me with your consent, by providing a business card or you having already agreed to your details being on a publicly circulated list of attendees.

3. The type of information I may hold

- Your commercial contact details, which may include personal data, include your name, postal address, email address, telephone number, and ID or tax number, payment and delivery conditions, financial and bank account details. The data in question will be retained throughout the business relationship only, or for the length of time stipulated to comply with legal and tax obligations.
- Commercial contact details of end customers contained in the documents to be translated, for which you have given me permission to process and I have signed an appropriate confidentiality agreement. According to the ICO in the UK, I am processing this data under my contract with you and the processing of this data is therefore necessary.
- Your commercial details that I have collected as part of a networking event, which I may pass on to other clients if I believe you are better placed to help them with their request than I am. I will usually check the actuality of this information before passing it on. If you then establish a working relationship with the client, the responsibility for updating your personal details held by them transfers to you as part of your own on-going business relationship with them.
- My website does **not** use cookies or any data analysis service and it does **not** contain any links to other websites.

4. How I may use the personal data you provide

- To arrange the details of the translation, editing or abstraction project
- To perform the translation, editing or abstraction project
- To record my own business statistics (e.g. monthly/annual spend)
- To deal with the financial aspects of our business relationship
- To deal with my accountant for financial and tax purposes

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- To supply my clients with an alternative translator if I am unable to meet their requirements because of:
 - Absence (sickness, holiday, training)
 - My language combination or specialisms are not a match for their requirements
- I do **not** use your personal data for marketing purposes.

5. Security of personal data

- All information that I hold concerning my clients will be held and processed by me strictly in accordance with the provisions of the EUROPEAN GENERAL DATA PROTECTION REGULATION (EU) 2016/679 (“GDPR”).
- Your personal information will be securely stored for no longer than is necessary having regard to the reasons for which it was first collected in my database in the form of paper and electronic files.
- I protect the privacy of your information using a secure PC system that is not part of a network and does not include a remote server.
- The equipment used for storing and processing personal data is updated as frequently as possible.
- Personal data is regularly backed up on a device other than that used on a day-to-day basis. The copy is stored in a secure place, separate from the computer containing the original files, so that personal data can be recovered in the event of loss or damage.
- All electronic systems in use for storing or processing personal information are password protected.
- Anti-virus software is installed on the equipment used for storing and processing personal data, to prevent the theft or destruction of this information. This anti-virus software is regularly updated.
- Firewalls are in place on all devices used for storing or processing personal data, to avoid remote unlawful third-party access.
- No such information is stored in the cloud.
- Your data will all be stored within England, UK.

6. Breaches of personal data

In the event of a security breach of personal data, due to theft or unlawful access for example, I will notify the Information Commissioner’s Office (ICO) within 72 hours of this security breach. This will include all of the information necessary to clarify the circumstances under which this happened. Notification will be done electronically via the ICO online portal: www.ico.org.uk

If a breach is likely to result in a high risk to the rights and freedoms of individuals, I will inform those concerned directly and without undue delay. A record will be kept of all breaches regardless of whether they are reported to a supervisory authority or not.

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7. Third party services used for processing data

7.1.1. Machine Translation

I do not currently use any forms of Machine Translation plug-ins.

7.1.2. My web hosting: FreeVirtualServers

<https://www.freevirtualservers.com/privacy-agreement>

7.1.3. My email clients I: eM Client

<http://www.emclient.com/docs/em%20client%20privacy%20policy.pdf>

7.1.4. My email client II: BTinternet

<https://www.productsandservices.bt.com/privacy-policy/>

7.1.5. Kilgray MemoQ Privacy Policy

<https://www.memoq.com/en/privacy-policy>

7.1.6. SDL Trados Studio Privacy Policy

<https://www.sdl.com/about/privacy/privacy-notice.html>

7.1.7. Lane, Monnington, Welton – Chartered Accountants

<http://www.lmwca.co.uk/>

8. How long I keep your personal data for

8.1.1. Details required to perform the contract

I will hold your personal information on my system for as long as is necessary for the performance of our professional relationship, or as long as is set out in any relevant contract you hold with me, or it is necessary for insurance or legal purposes. I review my retained data on a regular basis.

8.1.2. Translation documents

I have a Professional Indemnity Insurance policy which requires me to retain all communication pertaining to each project for reference in the event of a claim. Under English law, claims cannot be made after a period of six (6) years. Should you ask me to delete translations before the 6-year period has expired, I cannot be held responsible for queries or claims relating to the content, as I have no way of verifying the accuracy of the original content.

8.1.3. Data of colleagues from networking events

I will continue to hold this information for as long as I am a translator as it is part of the service I provide to my clients.

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Should I find that you are no longer operating as a translator, I shall delete your details from my database.

9. Sharing your personal data

- No personal data from a commercial relationship will be passed on to any other organisation or individual.
- Contact details from networking events will be passed on to clients for the reasons stated under 4.

10. The rights of the data subject

10.1. The right to be informed

This is covered by this policy

10.2. The right of access

The General Data Protection Regulation (“GDPR”) grants you the right to a copy of any data concerning you that has been processed by me. This is referred to as a Subject Access Request. I will respond promptly and certainly within the one month time frame laid down by the GDPR from the point of receiving the request and all the necessary information from you. The first request will be dealt with free of charge to yourself.

10.3. The right of rectification

Individuals are entitled to have personal data rectified if it is inaccurate or incomplete. I will respond to requests for rectification within one month of receipt of the request.

The accuracy of your information is important to me, if you change email address, or any of the other information I hold is inaccurate or out of date, please contact me.

10.4. The right to erasure (also known as the right to be ‘forgotten’)

You have a right to have your personal data erased and to prevent processing in specific circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
- Should you withdraw your consent to processing.
- Should you object to the processing and there is no overriding legitimate interest for me to continuing the processing.
- Your personal data was unlawfully processed (i.e. otherwise in breach of the GDPR).

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- Your personal data has to be erased in order to comply with a legal obligation.

10.5. The right to restrict processing

You have the right to ‘block’ or suppress processing of your personal data. I will retain just enough information to ensure that the restriction is respected in the future.

10.6. The right to data portability

This right allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability. The right to data portability only applies:

- to personal data an individual has provided to a controller;
- where the processing is based on the individual’s consent or for the performance of a contract; and
- when processing is carried out by automated means.

10.7. The right to object to processing

Individuals have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics.

10.8. Rights related to automated decision making including profiling

I do not use automated decision making or profiling.

11. Invoking your rights

If you would like to invoke any of the above-mentioned rights or if you have any queries or concerns regarding this policy or my privacy practices, please contact me using the details provided at the start of this Policy.

12. Review of this Policy

I keep this Policy under regular review. This Policy was last updated in October 2018.

13. Complaints

You have a right to complain to the ICO if you think there is a problem with the way I am handling your data: www.ico.org.uk