

PETER & CLARK

PRIVACY POLICY

This is the **Privacy Policy** offered by :

Peter & Clark - Multilingual Communication S.A.

Peter & Clark – Services S.A.

Peter & Clark – Technologies S.A

In their capacity of Joint-Controllers pursuant to the terms of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, the general data protection regulation (GDPR).

For detailed contact information, visit our websites:

- www.peterandclark.com
- www.peterandclark.services

To contact our **Data Protection Officer (DPO)**, please write to dpo@peterandclark.com

In short:

We will not give your data to third parties to use for their benefit without asking your permission.

We will never sell your data to any third-parties. We will not harvest or buy personal data in bulk and use them without permission from those who the data are about. We will not collect data about your behavior on our websites. For all the details on what we will do with your data, please read on.

Peter & Clark entities need some of your personal data if you purchase or use our products or services, or when you contact us, request for a quote or a deal, or when you access certain services or documents on our websites or portal. We also collect personal data when someone applies for a job by e-mail or through our LinkedIn pages.

If you represent an organization that purchases or uses our products and services, your personal data will be used in connection to this organization.

Peter & Clark entities are the data controllers and, in most cases, the data processing agent for your personal data.

We control, process, and protect your personal data according to the 2016/679/EC (GDPR) regulation of the European Commission, domestic data protection regulations as well as our audited information security management system.

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A. General policies

1. What personal data do we collect?

In general, we collect the following types of data from you :

- Name
- E-mail address
- Organization (company)
- Country
- City
- Address
- Phone numbers

If you purchase or subscribe to products or services, we also collect your billing details.

Whenever we collect personal data from you, as data subject, we assume that you provide your own details, not the details of someone else. If, however, you fill in someone else's data, please make sure you have the express, written, and voluntary consent of that person – or else a written authorization if you are filling in data on behalf of your employer or a manager at work.

For more specific information on the data we collect and the purposes we use them for, please read on below for the sections that apply to you.

2. Why do we need your data?

In general, we need your personal data for the following purposes:

- Processing your translation needs/use of our iTMS platform;
- Billing you for paid services you purchase or subscribe to;
- Inviting you to surveys about our products or services for the purpose of quality assurance as well as more accurate planning;

Storing and keeping some of your data may be required by law – see the section about how long we keep your data.

Processing your data for some purposes may be required for us to comply with existing contracts. In such cases, opting out from data processing is not possible without terminating the related contract.

For more specific information on the data we collect and the purposes we use them for, please read on for the sections that apply to you.

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3. How we will not use your data

We will not disclose your personal data to any unauthorized third-party recipients without your prior express consent.

If you are a citizen of the European Union, we will not transfer your data to external data processing agents that store or process the data in countries that are not approved by the European Commission due to lack of appropriate data protection regulations or infrastructure.

Your data will be processed in the European Union or in the United States, by external data protection agents that either offer GDPR compliance and being recognized as providing adequate protection.

For more details about the external data processing agents we use, see the next section.

4. Who will process your data and where?

For the purposes of mass e-mailing, surveys and recruitment, and translating your documents, we are contracting and using the following external data processing agents :

- **SurveyMonkey** : Survey collection and analysis service. This provider is based in the United States. Their privacy policy is available at <https://www.surveymonkey.com/mp/legal/privacy-policy/>. In their privacy policy, you are a 'Respondent'.
- **LinkedIn** : Communications and recruitment service. This provider is based in the United States. Their privacy policy is available at <https://www.linkedin.com/legal/privacy-policy>. In their privacy policy, you are either a 'member' or a 'visitor'.

The above data processing agents are exclusively used for the specific purposes outlined above. For all other purposes, we store and process your data on servers we host or have hosted in Luxembourg and Ireland.

As of May 24, 2018, we have a data processing agreement with each of the above data processing agents.

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5. How long do we keep your data ?

Under Luxembourgish law, we are required to keep your billing details and all documents about your business transactions with Peter & Clark entities for 10 years after your last purchase according to the Data Retention Policy.

These documents include offers, quotes, contracts, invoices, banking documents and customer support communication. After this period, your personal data will be irreversibly destroyed.

Any personal data held by us for marketing and service update notifications will be kept by us until such time that you notify us that you no longer wish to receive this information. If you wish to know more about our data retention policy, please contact us.

6. What are your rights ?

Regarding the personal data we collect and use, you have the right to :

- require us to inform you about the data we are storing and processing about you;
- require us to rectify or erase these data (exceptions may apply if the law or existing contracts require so);
- restrict or object to the data processing;
- transfer your data without restrictions to another data controller. This is called the right to data portability;
- withdraw your consent to process your data in general or for specific purposes (opt-out). Our actions to process your data before the time you withdraw your consent will still remain lawful.

More specifically:

If you believe that any personal data we hold on you is incorrect or incomplete, you may request to see this information, and have it corrected or deleted. Please contact us through our DPO.

If you wish to complain about how we have handled your personal data, please contact our DPO by e-mail or in writing at Solarwind Building, 11, rue de l'Industrie, L-8399 Ecoparc Windhof, Luxembourg. Our DPO will then look into your complaint and work with you to resolve the matter.

If you still feel that your personal data have not been handled appropriately according to the law, you may contact the Luxembourgish Data Protection Authority and file a complaint with them.

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7. Exceptions and restrictions

To these rights, the following exceptions and restrictions may apply:

- The above rights may not apply to non-personal data – if the data are about an organization and are not suitable to identify individuals.
- For specific (contractual) purposes, you – as an individual – may have the right to opt out from data processing. However, the organization you represent may not have this right. In this case, you are kindly asked to provide the data of another (consenting) representative to be the contact for your organization.

8. What rights do organizations have?

Privacy rights apply to individuals only. Organizations – legal entities – do not have these rights. The rights of organizations originate from the General Terms of Service, as well as the Civil Code of Luxembourg, except where an individual agreement specifies otherwise.

B. Specific policies by service

You need to read these sections in order to learn all the specifics about the data we collect from you and the purposes we use them for. Read all sections that apply to you – there can be more than one.

1. Are you an individual user of Peter & Clark – Multilingual Communication and/or Peter & Clark – Services?

As an individual user of our services, you have two agreements with us: a quote/contract and a service agreement (see our General Terms of Service through the link provided).

We collect the following data from you:

- Name
- E-mail address
- Organization (company)
- Country
- City
- Address
- Phone numbers

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What gives us the right to process these data?

- Tax regulations : For 10 years after a purchase, we must be able to provide proof of the business transaction to the tax authorities. For this purpose, we must retain the billing details and the related documents.
- Contractual obligations : Our agreements require that you specify valid contact details, so that we can check your eligibility to contract to the related services and communicate with you concerning the products and services you are using. If you ask us to erase your data or restrict this type of data processing, you may only do so if you terminate your agreements with us.
- Your consent : We may send you e-mails containing general or targeted offers, invitations to events or surveys concerning quality assurance. By entering into a service agreement with us, you consent to receive such communication from us. However, you may withdraw your consent at any time, without giving a reason.

2. Do you represent an organization that uses our iTMS platform (Peter & Clark – Technologies)?

As a representative of a corporate user of iTMS, your organization has two agreements with us: a contract and a service agreement (see the General Terms of Service).

We collect the following data from you:

- Name
- E-mail address
- Organization (company)
- Country
- City
- Address
- Phone numbers
- In case of purchase: Billing address of the organization (which, depending on the circumstances, may or may not be personal information)

What gives us the right to process these data?

- Tax regulations: For 10 years after a purchase, we must be able to provide proof of the business transaction to the tax authorities. For this purpose, we must retain the billing details and the related documents.
- Contractual obligations: Both the contract and the related service agreement require that you specify valid contact details, so that we can check your organization's eligibility to the related services and communicate with you concerning the products and services you are

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using. Such communication includes information about the licenses and services you are using, expiry reminders, update notifications, etc.

- If you ask us to erase your personal data or restrict this type of data processing, your organization will be required to appoint another contact person and supply us with their details.
- Your consent: We may send you e-mails containing general or targeted offers, invitations to events or surveys concerning quality assurance. By entering into a contract or service agreement with us, you consent to receive such communication from us. However, you may withdraw your consent at any time, without giving a reason. Your organization may also appoint another contact person who consents to receive such communication.

3. Are you applying for a job?

You will be asked to provide us with your resumé and give your consent to process your data. Personal data in the resumé will be processed in by us.

You may deny or withdraw your consent to process your resumé, but that may make you unable to apply for a position with us.

Danielle COMODI

Gabriel BLESER

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