Privacy Policy

First published: July 2018

I. Privacy Policy

Accentua Language Company Ltd is a company incorporated under British law with its registered office at The Old Chapel, Chapel Hill, Blunsdon, Wiltshire, United Kingdom, SN26 7BL (hereinafter, Accentua) — in compliance with the UK Data Protection Act 2018 (DPA 2018 and UK GPRD regulations—respects and protects the privacy of users of the site referred to as the accentuagroup.com domain, putting in place every possible and proportionate effort not to harm the rights of its users.

The purpose of this Privacy Policy is to help users understand the procedures that Accentua uses in the area of privacy, including what personal data is collected, why it is collected, how it is used, how it is protected, and which individual rights users possess.

This Privacy Policy does not apply to, and excludes our responsibility in terms of privacy, information, or other practices of third parties, including third parties who provide services to which the accentuagroup.com site refers.

This Privacy Policy applies to all personal data that Accentua acquires or processes when users interact with Accentua personnel. Examples include: purchasing and using our services, responding to marketing communications, and contacting Accentua team members. These interactions may involve visitors, customers, suppliers and/or partners.

II. General Information on Data Processing

In this Privacy Policy, the term “personal data” signifies information that refers to users. It allows us to identify users, directly or in combination with other information in our possession.

Users of the Site in General

Accentua processes user data based on consent. By using or consulting Accentua's site, users explicitly agree to this Privacy Policy and consent to the processing of their personal data in relation to the purposes and methods described below, including any disclosure to third parties, if necessary, for the provision of service. The provision of data and, consequently, the consent to the gathering and processing of data is optional. The user can deny consent and may revoke consent at any time. However, denying consent may make it impossible to provide certain services and the browsing experience on the site may be compromised.

Clients

Accentua shall do everything possible, to maintain the utmost confidentiality in its performance of services. All texts, the nature of the work performed, the personal data of the client communicated for translation purposes, and any information transmitted by the client to Accentua are subject to the strictest confidentiality and the personal data collected shall be processed in accordance with Articles 5 and 6 of the UK GDPR.

In particular, Accentua shall use the information provided for the execution of the contract (and for the eventual implementation of pre-contractual measures) and such information cannot — without the prior written consent of the client — be disclosed publicly or to third parties, except to its authorised employees or their authorised subcontractors, should their operational or advisory intervention require knowledge of such information. The above guarantees do not apply if Accentua is obliged by law to disclose such information, or in the event that such information is, or enters, in the public domain regardless of the disclosure of the same by Accentua. Similarly, for cases in which the vital interests of the data subject or of another natural person require the processing of personal data, or where the processing is necessary for the protection of a legitimate interest of Accentua or third parties, which is of a higher nature than the rights of the data subject.

Suppliers and Collaborators

The personal data of our freelance suppliers and collaborators (suppliers, translators, interpreters, voice-over talents, affiliates, consultants, etc.) shall be treated in strict confidence. The only information that shall be communicated to third parties is the information published if required, by project, such as username, mother tongue, work experience, and studies. Other information such as first name, last name, date of birth, addresses, and telephone numbers shall be processed only by Accentua and its authorised suppliers (i.e., accountants, banks, etc.), exclusively for the purpose of the correct execution of the employment relationship with the same and fulfilment of any legal obligations.

III. Automatically Collected Information - Web Browsing Data

Accentua's focus is on personal communication, therefore our website is currently <u>not</u> designed for collation of intelligent data and does not seek to collect the following:

- Name of the Internet Service Provider (ISP)
- Number of clicks, where applicable
- Method used to submit the request to the server
- Size of the file obtained in response
- Digital code indicating the status of the response given by the server

- Other parameters related to the operating system and the user's IT environment

Should this change at any point in the future, the Privacy Policy will be refreshed accordingly.

IV. Use of Cookies

Accentua's website uses cookies to help serve the correct pages to you as a user. These cookies are 'session cookies' and are reset whenever you start a new browsing session on your device. Our Analytics software may place cookies on your device to see how you interact with the pages and content on our site.

V. Social Networks

Accentua deploys the use of the Social Networks for marketing purposes. In using LinkedIn and other social media sites, it is the responsibility of the individual to ensure they are aware of the privacy policy and cookie settings as stated by such sites and these are not the direct responsibility of Accentua.

VI. Third party Websites

This Policy is not applicable on websites of third parties that are linked to our website. Accentua cannot guarantee that these third parties will protect your personal data or handle it in a reliable manner. We advise you to read the privacy statements of these websites before usage.

VII. Newsletter and email

Users may receive emails from Accentua for various reasons, such as for the confirmation of an order or the confirmation of the newsletter subscription, or to receive information on Accentua services.

Users may reject these types of communication by contacting Accentua at info@accentuagroup.com or contact the Data Controller at the address below.

VIII. Data Processing Location

All data collected is processed at the headquarters of the Data Controller and at the hosting data centre, Complete-IT, which handles data on behalf of the Data Controller and is located in the European Economic Area and acts in accordance with European standards.

IX. Transfer of Data to EU Countries

The Data Controller may share / transfer some data to the EU and 'third' countries outside the EEA. In particular with Microsoft. The transfer is authorised on the basis of specific rulings of the European Union and the Guarantor for the protection of personal data, in particular the SCCs (Standard Contractual Clauses). The companies mentioned above guarantee their adherence to the SCCs.

X. Safety Measures

Accentua processes the data of users in a lawful and proper manner, adopting appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of data. Processing is carried out by using computer and/or electronic tools, using appropriate measures at the organisational, technical, and administrative level in order to protect personal data within our company, using criteria strictly related to the purposes stated. However, no data transmission and no storage system can be guaranteed as 100% secure. Users who have reason to believe that their interactions with us are no longer secure are asked to kindly report the issue immediately.

In addition to the Data Controller, in certain cases other parties involved in the running of the website may have access to stored personal data (administrative, sales, accounting and system administrator personnel) or external individuals (such as third-party technical service providers, mail couriers, hosting providers, IT companies, and communication agencies) which may, if necessary, be appointed by the Data Controller to handle personal data.

The personal data of users shall be kept for as long as necessary, or permitted, in light of the purposes for which they are collected. The criteria adopted for determining storage times are as follows: (i) the need to fulfil a contract or a legal obligation to which we are subject; (ii) the opportunity to retain data in light of our legal position (for example, with regard to time limits, disputes, or regulatory compliance checks).

XI. Rights of the User

Pursuant to the GDPR and UK regulations, the user can, in the manner and within the limits established by current legislation, exercise the following rights in relation to his or her personal data:

- Request confirmation of the existence of personal data concerning him/her (right of access)
- To know its origin
- To have information about the criteria, the methods, and the purposes of the processing
- Request the updating, rectification, integration, cancellation, transformation into anonymous form, blocking of data processed in violation of the law, including those no longer necessary for the pursuit of the purposes for which they were collected
- In cases of consent-based processing, receive any support at-cost for data on yourself that has been provided to the Data Controller, in a structured and readable form, complied by a data processor, and in a format commonly available on electronic devices
- Right to file a complaint with the Supervisory Authority
- As well as, more generally, exercise all the rights that are recognised by the current provisions of law

Requests should be addressed to the Data Controller. In particular, the user can exercise his or her rights in regard to the processing of personal data by contacting info@accentuagroup.com or by cancelling your subscription to our newsletter, or by

contacting the Data Controller at the email address provided above. We will respond to the request in accordance with the applicable laws.

Users are invited to indicate in their request which personal data they wish to have modified, to inform us if they prefer that such data be deleted from our database, or to specify what limitations they wish to put on our use of their personal data. It is important to note that we may need to retain certain information for registration purposes and/or to complete the transactions initiated by users prior to requesting a change or cancellation.

XII. Special Information for Parents

Accentua's website is not intended for children, as required by applicable laws, and we do not knowingly collect personal information from minors. However, Accentua undertakes to comply with the provisions of the law where these require the authorisation of a parent or guardian to collect, use, or disclose the personal data of minors. We are committed to protecting the privacy of minors and we encourage parents and guardians to play an active role in their children's activities and interests on the net.

If a parent or guardian becomes aware that a minor child has provided us with their personal data without your consent, we invite you to contact the Data Controller at the address provided below. If we learn that a minor has provided us with their personal data, we shall remove them from our files.

XIII. Data Controller

The Data Controller — in accordance with the GDPR and other UK data protection laws, as well as other provisions on data protection — is Accentua Group Ltd, The Old Chapel, Chapel Hill, Blunsdon, Wiltshire, United Kingdom, SN26 7BL which can be contacted at the following email address: info@accentuagroup.com

The Data Processor for processing is Complete-IT.

XIV. Changes to this Privacy Policy

Accentua retains the right to make changes to this Privacy Policy. It is recommended that you consult the Privacy Policy regularly, so that you will be aware of such amendments.

This Privacy Policy has been updated in August 2021.

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Registered Company Number: 8354811
VAT Registration Number: 158 6934 62