



## Privacy Policy and Cookies

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### I. Privacy Policy

OOO ELSE, a legal entity incorporated under the law of the Russian Federation with its registered office at Aleksandra Nevskogo Street, No.19-25, 125047, Moscow, Russia (hereinafter – ‘TranslatiON’) – in compliance with the requirements of the Russian Federal Law on Personal Data (No. 152-FZ) – respects and protects the privacy of users of the site referred to as the [translati-on.com](https://translati-on.com) domain (hereinafter – ‘Site’), 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 TranslatiON 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 privacy, information, or other practices of third parties, including third parties who manage websites or services to which the Site refers, and excludes our responsibility in terms of these practices.

This privacy policy applies to all personal data that TranslatiON acquires or processes when users interact with the Site. Examples include submitting a job application or contacting TranslatiON customer service. These interactions may involve visitors, clients, 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

TranslatiON processes user data based on consent. By using or consulting the 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 gathering and processing 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**

TranslatiON shall do everything possible, consistent with the electronic form of service, 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 the purposes of translation, interpretation, or business editing, and any information transmitted by the client to TranslatiON are subject to the strictest confidentiality and the personal data collected shall be processed in accordance with Federal Law No. 152-FZ.

In particular, TranslatiON 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 authorized employees or subcontractors, should their operational or advisory intervention require knowledge of such information. The above guarantees do not apply if TranslatiON is obliged by law to disclose such information, or in the event that such information is in the public domain or enters it regardless of the disclosure of the same by TranslatiON. This similarly applies to cases in which the vital interests of the data subject or of another person require the processing of personal data, or where the processing is necessary for the protection of a legitimate interest of TranslatiON 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, designers, developers, consultants, etc.) shall be treated in strict confidence. Such information as first name, last name, date of birth, email addresses, telephone numbers, work experience, education, mother tongue, and working languages shall be processed only by TranslatiON and its authorized suppliers (i.e., accountants, banks, etc.), exclusively for the purpose of the correct execution of the employment relationship with the same and fulfillment of any legal obligations.

## **III. Automatically Collected Information. Web Browsing Data**

As with all websites, the Site also makes use of log files in which information from user visits is automatically collected and stored. The information collected could include the following:

- Internet Protocol (IP) Address

- Type of browser and device parameters used to connect to the Site
- Name of the Internet Service Provider (ISP)
- Date and time of visit/request
- 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

The information listed above is handled automatically and collected in an exclusively aggregated form in order to verify the correct functioning of the Site, and for security reasons. For the purposes of security (spam filters, firewalls, virus detection), automatically registered data may also include personal data such as IP address (the one that uniquely identifies, at least at that time, the host), which could be used — in compliance with the laws in force on the subject — to block attempts to damage the Site, harm other users, the carrying out of malicious activities, and activities that constitute a crime. This type of data is used to protect the Site and its users.

The listed data is used for the sole purpose of obtaining anonymous statistical information on the use of the website and to check its correct functioning. Consequently, data is deleted immediately after processing. The data used for security purposes (the blocking of attempts to damage the Site) is kept for seven days.

#### **IV. Use of Cookies**

##### **Definition of Cookies**

A cookie is a small text file sent to the browser by the visited website and then stored on the hard disk of the user's computer. When you connect to the website again, cookies are read back and recognized by the website that sent them.

Cookies can be used for different purposes, such as allowing a website to recognize a user's device, or monitoring sessions and storing specific information about users accessing the server.

##### **Types of Cookies**

Technical Cookies are necessary for a website to function properly and to allow a user to make use of a service.

Functional Cookies are used to facilitate website navigation, to store selected settings, and to provide customized features.

Analytical Cookies are used by websites to collect information on usage habits, visited pages, and any errors that may occur during browsing. These cookies do not collect information that could identify the user's computer. All information collected by these cookies is aggregated and therefore anonymous.

By using the Site, the visitor expressly consents to the use of cookies.

### **Disabling Cookies**

Cookies are associated with the browser and can be disabled at any time directly from the browser, thereby refusing/withdrawing consent for the use of cookies. It should be noted that disabling cookies may prevent the proper use of some features on the Site.

Each browser has a different procedure for managing settings. Below are specific instructions for each browser:

- [How to manage cookies in Internet Explorer](#)
- [How to delete cookies in Internet Explorer](#)
- [How to manage cookies in Firefox](#)
- [How to delete cookies in Firefox](#)
- [How to manage cookies in Chrome](#)
- [How to manage cookies in Safari and iOS](#)

### **V. Emails**

Users may receive emails from TranslatiON for various reasons, such as for the confirmation of an order, or the supplier's email verification, or notifying about the status of a job application.

### **VI. Data Processing Location**

The data collected by the Site is processed at the headquarters of the Data Controller and at the web hosting data center. The web hosting, Beget, which is responsible for the processing of data, and handles data on behalf of the Data Controller, is located in the Russian Federation and acts in accordance with the Russian Federation standards.

### **VII. Safety Measures**

The Site processes the data of users in a lawful and proper manner, adopting appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of data. Processing is carried out by using computer and/or electronic tools, using appropriate measures at the organizational, 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.

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

### **VIII. Rights of the User**

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:

- To request confirmation of the existence of personal data concerning him/her (right of access);
- To learn its origin;
- To receive intelligible communications;
- To have information about the criteria, the methods, and the purposes of the processing;
- To request the updating, rectification, integration, cancellation, transformation into anonymous form, blocking of data processed in violation of the law, including that no longer necessary for the pursuit of the purposes for which it was 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, compiled by a data processor, and in a format commonly available on electronic devices;
- As well as, more generally, to exercise all the rights that are recognized 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 accessing the Site, for

example, by contacting the Data Controller through the Contact Form at <https://translation.com/contact-us/>. 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 order initiated by users prior to requesting a change or cancellation.

## **IX. Special Information for Parents**

The Site is not intended for children, as required by applicable laws, and we do not knowingly collect personal information from minors. However, TranslatiON undertakes to comply with the provisions of the law where these require the authorization 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 has provided us with any personal data without their consent, we invite that parent or guardian to contact the Data Controller at [frontdesk@translation.com](mailto:frontdesk@translation.com). If we learn that a minor has provided us with their personal data, we shall remove it from our files.

## **X. Data Controller**

The Data Controller — in accordance with the Russian Federation laws on personal data, as well as other provisions on data protection — is OOO ELSE (Aleksandra Nevskogo Street, No.19–25, 125047, Moscow, Russia), which can be contacted at the following email address: [frontdesk@translation.com](mailto:frontdesk@translation.com).

## **XI. Updates**

This privacy policy was updated on May 21, 2020.