

NASEVA TRANSLATIONS

Privacy Policy

This Privacy Policy explains how Naseva Translations uses and processes your information confidentially and in accordance with the EU General Data Protection Regulation (GDPR).

Further information on the GDPR is available in English, German and Japanese on the following websites:

[European Commission: 2018 reform of EU data protection rules \(in English\)](#)

[Europäische Kommission: Reform der EU-Datenschutzvorschriften 2018 \(auf Deutsch\)](#)

[EY Japan: EU 一般データ保護規則 \(GDPR\) の概要と企業が対応すべき事項 \(日本語\)](#)

1. Holder of the register

Naseva Translations (VAT ID: FI27982905), PL 1090, 00101 Helsinki, FINLAND

2. Person in charge of register issues or contact person

Saana Kaurala, e-mail: nasevakaannos@gmail.com

3. Name of the register

Naseva Translations has two registers: customer register and subcontractor register.

4. Lawful basis and purpose of processing personal data

The lawful basis under the EU General Data Protection Regulation for processing personal data that is stored in the register is the legitimate interest of Naseva Translations (customer relationship). The purpose of processing personal data of the customer register is customer communication, management of customer relationship, performance of contracts and invoicing of ordered services.

The purpose for Naseva Translations to process personal data of the subcontractor register is to carry out duties as a contractor.

The personal data is not processed for direct marketing purposes, automated decision making or profiling.

5. Content of the register

The register contains the following information: name, job position, organization, contact details (phone number, email address, mail address), billing information, other information connected to customer relationship and ordered services.

For purposes of meeting legal requirements and improving customer service, personal data is retained for a period of five (5) years from the latest order of the customer in question, after which time the personal data will be destroyed.

6. Regular sources of data

The personal data that is stored in the register is collected from the customer for example through online contact forms, emails, phone calls, social media services, contracts, meetings and other occasions where the customer provides the holder of the register with personal data.

The personal data provided by subcontractors is acquired in terms of the business relationship between the contractor and the subcontractor.

7. Regular transfers of data and transfers of data outside the EU or EEA

In general, personal data will not be disclosed to third parties. In some cases, personal data may be disclosed confidentially to subcontractors who will process personal data in accordance with a written subcontractor agreement between the holder of the register and the subcontractor.

In some cases, for example if a subcontractor is located in Japan, personal data may be transferred outside the EU. If personal data is transferred outside the EU, the holder of the register shall ensure that the possible transfer will be taken place on a basis requested by law and with adequate safeguard mechanisms.

8. Principles of registry protection

The registry is treated with great care and all personal data is protected appropriately using information systems. When data is stored on web servers, the physical and digital data security of the equipment thereof is appropriately taken care of. The controller is in charge of overseeing that collected data, server privileges and other information that are critical for the safekeeping of personal data are handled confidentially and only by employees tasked with processing them.

9. Right of access and right to rectification

Each person included in the registry has the right to examine all data collected from them as well as having erroneous data corrected and incomplete data complemented. If the person included in the registry wishes to examine, correct or complement their data, a written request must be sent to the contact person referred in this Privacy Policy. The contact person may, if necessary, request the person making the request to prove their identity. The contact person will reply the person making the request within the time limit set out in the General Data Protection Regulation (typically within one month).

10. Other rights related to the processing of personal data

Each person included in the register has the right to request deletion of their personal data from the register in so far as any other law or the legal certainty of the holder of the register does not require the storage of the data. Furthermore, the person included in the register has other rights under the EU General Data Protection Regulation, such as right to restrict processing of the personal information in certain situations. Requests must be sent in writing to the contact person referred in this Privacy Policy. The contact person may, if necessary, request the person making the request to prove their identity. The contact person will reply the person making the request within the time limit set out in the General Data Protection Regulation (typically within one month).

11. Changes in this Privacy Policy

In the event of changes in the law or in the way personal data is processed, this Privacy Policy shall be updated as and when necessary. This Privacy Policy was last updated on June 6th 2018.