

Privacy and cookies policy

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors, service users and individual customers.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can limit the collection, sharing and publication of your personal data.
- 1.4 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.
- 1.5 In this policy, "we", "us" and "our" refer to Bennett Pasquazi Translations Ltd. For more information about us, see Section 12.

2. The personal data that we collect

- 2.1 We may process data enabling us to get in touch with you ("**contact data**"). The contact data may include your name, email address, telephone number and postal address.
- 2.2 We may process your personal data that are provided in the course of the use of our services ("**service data**"). The service data may include your name, email address, telephone number and postal address. The source of the service data is you and/or your employer and/or our services.
- 2.3 We may process information contained in or relating to any communication that you send to us or that we send to you ("**communication data**"). The communication data may include the communication content and metadata associated with the communication.
- 2.4 We may process data about your use of our website ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system.

3. Purposes of processing and legal bases

- 3.1 **Operations** - We may process your personal data for the purposes of operating our website, the processing and fulfilment of orders, providing our services, generating invoices, bills and other payment-related documentation, and credit control. The legal basis for this processing is our legitimate interests, namely the proper administration of our website, services and business.
- 3.2 **Record keeping** - We may process your personal data for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access to all the

information we need to properly and efficiently run our business in accordance with this policy.

- 3.3 **Insurance and risk management** - We may process your personal data where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.4 **Legal claims** - We may process your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.5 **Legal compliance and vital interests** - We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

4. Providing your personal data to others

- 4.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks and obtaining professional advice.
- 4.2 Your personal data held in our website database will be stored on the servers of our hosting services providers.
- 4.3 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. Retaining and deleting personal data

- 5.1 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 5.2 We will retain your personal data as follows:
 - (a) Contact data will be retained for a minimum period of 1 year following the date of the most recent contact between you and us, and for a maximum period of 7 years following that date;
 - (b) Service data will be retained for a minimum period of 1 year following the date of termination of the relevant contract, and for a maximum period of 7 years following that date;
 - (c) Communication data will be retained for a minimum period of 1 year following the date of the communication in question, and for a maximum period of 7 years following that date;
 - (d) Usage data will be retained for 1 year following the date of collection.

5.4 Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Security of personal data

6.1 We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.

6.2 We will store your personal data on secure servers, personal computers and mobile devices, and in secure manual record-keeping systems.

7. Your rights

7.1 Your principal rights under data protection law are:

- (a) **the right to access** - you can ask for copies of your personal data;
- (b) **the right to rectification** - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
- (c) **the right to erasure** - you can ask us to erase your personal data;
- (d) **the right to restrict processing** - you can ask us to restrict the processing of your personal data;
- (e) **the right to object to processing** - you can object to the processing of your personal data;
- (f) **the right to data portability** - you can ask that we transfer your personal data to another organisation or to you;
- (g) **the right to complain to a supervisory authority** - you can complain about our processing of your personal data; and
- (h) **the right to withdraw consent** - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

7.2 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting https://edpb.europa.eu/our-work-tools/general-guidance/gdpr-guidelines-recommendations-best-practices_en and <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

7.3 You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

8. About cookies

8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set

expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

- 8.3 Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

9. Cookies that we use

9.1 We use cookies for the following purposes:

- (a) **authentication and status** - we use cookies to identify you when you visit our website and as you navigate our website;
- (b) **analysis** - we use cookies to help us to analyse the use and performance of our website; and
- (c) **cookie consent** - we use cookies to store your preferences in relation to the use of cookies more generally.

10. Cookies used by our service providers

10.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

10.2 We may use Google Analytics. Google Analytics gathers information about the use of our website by means of cookies. The information gathered is used to create reports about the use of our website. You can find out more about Google's use of information by visiting <https://www.google.com/policies/privacy/partners/> and you can review Google's privacy policy at <https://policies.google.com/privacy>.

11. Managing cookies

11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop> (Firefox);
- (c) <https://help.opera.com/en/latest/security-and-privacy/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac> (Safari); and
- (f) <https://support.microsoft.com/en-gb/help/4468242/microsoft-edge-browsing-data-and-privacy> (Edge).

11.2 Blocking all cookies will have a negative impact upon the usability of many websites.

11.3 If you block cookies, you may not be able to use all the features on our website.

12. Our details

12.1 This website is owned and operated by Bennett Pasquazi Translations Ltd.

12.2 We are registered in England and Wales under registration number 09287773, and our registered office is at Counsells, Smithbrook Kilns, Cranleigh, Surrey, GU6 8JJ.

12.3 Our principal place of business is at 27 Wheaton Grange, 16 Branksome Wood Road, Bournemouth, BH4 9JY.

12.4 You can contact us:

- (a) by post, to 27 Wheaton Grange, 16 Branksome Wood Road, Bournemouth, BH4 9JY;
- (b) by telephone, on either contact number published on our website; or
- (c) by email, using either email address published on our website.

13. Data protection registration

13.1 We are registered as a data controller with the UK Information Commissioner's Office.

13.2 Our data protection registration number is ZA810791.