



## **Privacy Policy**

Omnilingua Limited is committed to protecting your privacy. This policy explains in simple and easy to understand language what data we collect:

- Through our website
- When you sign up to use our website
- Through the provision or marketing of the services we provide through our website
- Direct interaction with you as a result of you visiting our website

It also explains what we do with your data and what you can do to access, rectify or ask us to delete any personal data we hold. For data protection purposes, Omnilingua Limited is the controller and, unless otherwise noted, is also the processor of data.

Our website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

We may update this policy from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

Protecting your personal data is important to us. We have set up a dedicated email for any questions you may have. You can find other ways of getting in touch with us at the end of these terms.

## **What data we collect**

When you register on our website, we collect certain information for our records, including your name, email address (each and together, Identity Data), the name of the company you may be working at or representing.

When you visit our website, we may automatically collect information about the website that referred you to us, your IP address, browser type, language and access times (Technical Data). We may also collect navigational information related to the pages visited on our website including viewed pages, clicked links and other actions taken in connection with the site (Usage Data).

Finally, we record your preferences in receiving marketing from us and our third parties and your communication preferences (Marketing and Communications Data).

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data, but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

## **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. For example, if we fail to collect your Contact or Financial Data, we will not be able to provide you with the goods or services you have asked us to provide. In this case, we may have to cancel a product or service you have with us. However, we will notify you at the time.



### **Changing your details**

We want to keep your personal data accurate and current. Please let us know if your personal data changes during your relationship with us.

### **How is your personal data collected?**

We use different methods to collect data from and about you including:

Direct interactions. You may give us your Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Apply for our products or services
- Subscribe to our service or publications
- Request marketing to be sent to you
- Enter a competition, promotion or survey
- Give us some feedback

Automated technologies or interactions. As stated above, when you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. The terms of our cookie policy are set out below.

Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below.

Technical Data from the following parties:

- Analytics providers.
- Identity and Contact Data from data brokers or aggregators based inside or outside the EU.
- Identity and Contact Data from our foreign partners based inside and outside the EU.

### **What we do with the data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests and your interests or fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased products or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

When you register on our website, you can choose, by opting in, whether to receive our marketing communication. If we send you marketing email following your setting up an account on our website, you can unsubscribe from specific emails by clicking on the Unsubscribe link at the bottom of any of our marketing emails.

You can change or update your preferences as to our use of your Marketing and Communications Data at any time by contacting us at: [mkg@omnilingua.co.uk](mailto:mkg@omnilingua.co.uk). Where you opt out of receiving our marketing messages, this will not apply to personal data provided to us as a result of your purchase of our products or services or as may be permitted by law. You will continue to receive transactional communications from us relating to invoices and order confirmations, if applicable.



### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Disclosures of your personal data**

Omnilingua will not share your information with any third parties, except with the following third parties:

Service providers who perform services on our behalf e.g. entities who assist us in translation or direct marketing. Those companies are required to maintain the confidentiality of the information and are prohibited from using it for any other purpose.

We may need to disclose information about you if required to do so by law; in connection with any legal proceedings or prospective proceedings; in order to establish, exercise or defend our legal rights; and to the purchaser or prospective purchaser of any business or asset which we are, or are contemplating, selling.

### **International transfers**

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK and the EU/US.

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

### **Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

Request access to your personal data (commonly known as a data subject access request). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct



marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: if you want us to establish the data's accuracy; where our use of the data is unlawful but you do not want us to erase it; where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at:

mkg@omnilingua.co.uk.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **Cookies and other technologies**

Cookies are small text files that are placed on your PC, phone or other web enabled devices when you are visiting the Omnilingua website. They are not harmful to your computer. Cookies are an essential part of how a site works and will be used to enhance your overall experience by enabling the site to remember you either for the duration of your visit or for repeat visits. Cookies contain information that can later be retrieved by the web application that deposited it on your device.

Omnilingua Ltd may use the information we obtain from our cookies for the following purposes:

To recognise visits from returning registered users

To offer the option of automatic login when a registered user returns to the site

To store preferences such as the number of items to display in the search result page

Omnilingua uses cookies from another partner, Google, which collects the following information:

Identify if users are arriving at the site via referral sites or links

- Analyse user traffic and behaviour to compile activity reports. These reports will only be used by Omnilingua Ltd and will not be made available to any third party

- Analyse user behaviour including emails clicked, pages visited, search terms entered and items purchased to generate targeted communications

- Gather statistical data including but not limited to Internet service provider and host, time on the site and pages viewed/site path



### **Managing Cookie Preferences**

If you don't want to receive cookies, you can modify your browser so that it notifies you when cookies are sent to it or you can refuse cookies altogether. You can also delete cookies that have already been set.

If you wish to restrict or block web browser cookies on your device then you can do this through your browser settings; the Help function within your browser should tell you how. Alternatively, you may wish to visit [www.aboutcookies.org](http://www.aboutcookies.org), which contains comprehensive information on how to do this on a wide variety of desktop browsers.

### **Security**

The security of your personal information is important to us. We take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We use and keep up to date firewalls to protect our network and use data encryption for passwords. Physical access to facilities where your personal data is stored is limited to authorised personnel.

You have the ability to accept or decline cookies. Most browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies.

You are responsible for keeping your password and user details confidential. We will not ask you to reveal your password.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Our contact details:

Data Protection Officer

Omnilingua Ltd

86 South Street, Dorking, Surrey RH4 2EW

Email [mkg@omnilingua.co.uk](mailto:mkg@omnilingua.co.uk)

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