

PRIVACY POLICY

Osäühing Luisa Tõlkebüroo (hereinafter Luisa Translation Agency) adheres to the requirements and principles set out in this Policy. Luisa Translation Agency considers the privacy of individuals and personal data protection important and, therefore, has developed this Privacy Policy that provides for the purposes, terms and conditions of personal data processing and rights relating to the personal data of data subjects. Luisa Translation Agency considers the confidentiality and protection of personal data crucial and guarantees the lawfulness of personal data processing.

1. Terms and definitions

- 1.1.** Personal data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 1.2.** Processing means any operation or set of operations that is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 1.3.** Controller means the natural or legal person, public or local government authority being the original collector of personal data. The controller determines the purposes and means of the processing of personal data.
- 1.4.** Processor means a natural or legal person, public or local government authority that processes personal data on behalf of and on instructions from the controller.
- 1.5.** Third party means a natural or legal person, public or local government authority, agency or body.
- 1.6.** Personal data breach means a breach leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.
- 1.7.** Data subject means a person whose personal data are processed.

2. Principles

- 2.1.** When processing personal data, Luisa Translation Agency follows the following principles:
 - 2.1.1.** the principle of lawfulness, fairness and transparency – personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject;
 - 2.1.2.** the principle of purpose limitation – personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;

- 2.1.3.** the principle of data minimisation – personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- 2.1.4.** the principle of accuracy – personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- 2.1.5.** the principle of storage limitation – personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- 2.1.6.** the principle of integrity and confidentiality – personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

3. Security of processing

- 3.1.** Following the principle of reasonableness, Luisa Translation Agency applies different organisational, physical and information technology security measures to protect personal data.
- 3.2.** Luisa Translation Agency may, in certain cases, use processors for the processing and provision of services. Luisa Translation Agency ensures that processors process personal data on instructions from Luisa Translation Agency and in accordance with applicable law as well as take relevant security measures. Confidentiality agreements have been entered into with any and all processors.
- 3.3.** Luisa Translation Agency immediately notifies data subjects of any personal data breaches.

4. Categories of personal data

- 4.1.** Luisa Translation Agency processes personal data obtained directly from data subjects and personal data obtained in the course of the provision of services, which are considered the Services and/or any other services that might be provided by Luisa Translation Agency (hereinafter collectively or individually referred to as “Services”). Luisa Translation Agency does not collect, store, analyse or use personal data arising from the Services for purposes other than the Services.
- 4.2.** Luisa Translation Agency processes the following personal data:
 - 4.2.1.** given name and surname;
 - 4.2.2.** e-mail address;
 - 4.2.3.** contact telephone;
 - 4.2.4.** address;
 - 4.2.5.** website user statistics;
 - 4.2.6.** data arising from the Services to a strictly limited extent.
- 4.3.** Luisa Translation Agency is a controller of personal data and adheres to the principles of ensuring the confidentiality of personal data to guarantee the privacy rights of individuals.

- 4.4.** Persons authorised by Luisa Translation Agency only have access to personal data to alter and process the data.

5. Purposes of processing

- 5.1.** Luisa Translation Agency processes personal data to perform an agreement and ensure performance thereof.
- 5.2.** The purpose of processing personal data specified in clause 4.2 of this Privacy Policy is to:
- 5.2.1.** provide high-quality Services;
 - 5.2.2.** enter into an agreement (incl. a confidentiality agreement);
 - 5.2.3.** submit invoices for any Services provided;
 - 5.2.4.** carry out project management;
 - 5.2.5.** improve the user-friendliness of the website.

6. Third parties, authorised persons and cross-border transmission of personal data

- 6.1.** Proceeding from the purposes strictly limited to necessity, Luisa Translation Agency may transmit personal data to third parties and authorised persons for the following objective:
- 6.1.1.** to perform the the Services agreed (to provide the service).
- 6.2.** Due to the nature and language combinations of the the Services, there may be situations requiring the cross-border transmission of personal data (personal data arising from the Services) to partners.
- 6.3.** Luisa Translation Agency confirms that they apply appropriate security measures to cross-border transmission of personal data.
- 6.4.** Luisa Translation Agency confirms that they only transmit personal data to such third parties and processors that apply adequate security measures to ensure the security of protection of personal data.

7. Processing of personal data of minors

- 7.1.** Luisa Translation Agency understands the importance of ensuring the security of the processing of personal data of minors and, thus, applies all the relevant administrative and technological security measures to the processing of personal data of minors. Luisa Translation Agency only processes the personal data of minors for the purpose of the Services if the subject-matter included in the Services includes personal data (personal data arising from the Services).

8. Rights of data subjects

- 8.1.** Data subjects have the right to have their personal data erased.
- 8.2.** Data subjects have the right to make inquiries concerning their personal data that they have submitted to Luisa Translation Agency.

- 8.3.** Data subjects have the right to restrict the processing of their personal data.
- 8.4.** Data subjects have the right to lodge a complaint about the processing of personal data with the Data Protection Inspectorate.

9. Storage of personal data

- 9.1.** Luisa Translation Agency keeps personal data in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed, unless Luisa Translation Agency has to comply with a requirement arising from law providing for different terms of storing personal data.
- 9.2.** Luisa Translation Agency will destroy and/or erase securely any personal data with no purpose for storage after one year has passed from the provision of the service, unless otherwise agreed between the recipient of the service and Luisa Translation Agency.

10. Use of cookies

- 10.1.** The www.luisa.ee website managed by Luisa Translation Agency may use cookies to make the user experience more convenient and the use of the website smoother.
- 10.2.** A cookie is a small text file automatically saved by the web browser in the device used by the person. Cookies are used to:
 - 10.2.1.** collect anonymous and generalised statistics regarding the number of visitors of the website and information about the manner of using the website in order to make the website even more user-friendly and convenient.
- 10.3.** Cookies saved in the device can be blocked by not agreeing to the use of cookies. To this end, the respective settings of the web browser must be changed. Web pages might not work properly and some of the services might be unavailable if cookies are not allowed.

11. Amendments to Privacy Policy

- 11.1.** Luisa Translation Agency considers the privacy of individuals important and, therefore, Luisa Translation Agency updates this Privacy Policy on a regular basis. The latest version of the Privacy Policy is always available on the website.

12. Contact details

- 12.1.** If you have any questions, concerns or proposals concerning the processing of personal data, you can contact the controller, using the following contacts details:

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