

PRIVACY POLICY

Osaühing Luisa Tõlkebüroo (hereafter referred to as **Luisa Language Solutions** or 'we') adheres to the requirements and principles set out in this Privacy Policy. Luisa Language Solutions values the privacy of individuals and personal data protection, which is why we have developed this Privacy Policy, which sets out the purposes, terms and conditions of personal data processing and rights related to the personal data of data subjects. Luisa Language Solutions considers the confidentiality and protection of personal data to be very important, and guarantees the lawfulness of personal data processing.

1. Scope of Privacy Policy

This Privacy Policy is applicable when you:

- a) use the Luisa Language Solutions website (<https://www.luisa.ee/>);
- b) order services from Luisa Language Solutions; and/or
- c) contact Luisa Language Solutions using the enquiry form on the website or via e-mail or any other electronic means of communication.

2. Terms and definitions

Personal data	Any information related 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.
Processing of personal data	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, alteration, retrieval, consultation, use, disclosure (by transmission, dissemination or otherwise), alignment, combination, restriction, erasure or destruction.
Controller	The natural or legal person or public or local government authority serving as the original collector of personal data. The controller determines the purposes and means of the processing of personal data.
Processor	The natural or legal person or public or local government authority that processes personal data on behalf of and as instructed by the controller.

Third party	A natural or legal person, public or local government authority, agency or body.
Personal data breach	A breach leading to the accidental or unlawful destruction, loss, alteration or unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed.
Data subject	The person whose personal data are processed.
Client	A recipient of a Luisa Language Solutions service, who may be a natural or legal person.

3. Controller and processor of personal data

Depending on our relationship with the data subject and the way in which the personal data reach us, we process personal data as both the controller and processor.

As the controller, we process data about our clients, who may be natural or legal persons. We also process data about individuals who contact us by e-mail, via our website contact form or in another manner.

The controller of personal data is:

Luisa Language Solutions

Rotermanni 7, 10151 Tallinn

luisa@luisa.ee

Luisa Language Solutions as the processor

As the processor, we process personal data of which we become aware in the course of providing a language service, the controller of which is the client who ordered the respective service from us. As the processor, we adhere to the written instructions of the controller when processing personal data.

4. Principles

4.1. Luisa Language Solutions observes the following principles when processing personal data:

- 4.1.1. The principle of fairness, lawfulness and transparency: processing must be fair, lawful and transparent for the data subject.
- 4.1.2. The principle of purpose limitation: personal data are collected for clear, specific and legitimate purposes and undergo no further processing in a manner that is incompatible with those purposes.
- 4.1.3. The principle of data minimisation: personal data must be adequate, relevant and limited to that which is necessary given the purposes for which they are being processed.
- 4.1.4. The principle of accuracy: personal data must be accurate and, where necessary, kept up to date, and all reasonable steps must be taken to ensure that personal data which are inaccurate, with regard to the purposes for which they are being processed, are erased or rectified without delay.

- 4.1.5. The principle of storage limitation: personal data are retained in a form which enables the identification of data subjects only for as long as this is necessary for the purposes for which the personal data are processed.
- 4.1.6. The principle of integrity and confidentiality: personal data are processed in a manner that ensures the appropriate security of the data, including protection against unauthorised or unlawful processing and accidental loss, destruction or damage by utilising appropriate technical or organisational measures.

5. Personal data processed, purpose and legal basis

Luisa Language Solutions always processes personal data to the minimum extent possible, and only for the purposes and on the legal basis described below. Only persons authorised by Luisa Language Solutions who require it have access to the processing of personal data.

5.1. Provision of service

A contract is entered into between Luisa Language Solutions and the client for the provision of a service. For the purposes of entering into the contract and exercising the rights and fulfilling the obligations arising therefrom, we process the following personal data pertaining to the client or their representative:

- a) Given name and surname
- b) Contact details (telephone number, e-mail address and postal address)
- c) Data required for invoicing
- d) Information provided to us by the client of their own initiative prior to or in the course of the contract (e.g. the content of e-mail correspondence and files attached to e-mails or website enquiry forms)

Such personal data must be processed to facilitate entry into the contract between Luisa Language Solutions and the client, and for the exercising of the rights and fulfilment of the obligations arising therefrom.

In the course of fulfilling contracts entered into with a client, personal data contained in text or other content provided by the client are also processed. Such data may include:

- a) the given name and surname of a third party;
- b) the e-mail address, telephone number and postal address of a third party; and/or
- c) other data, depending on the content of the work and its needs.

Such data processing is carried out on behalf of and as instructed by the client as the controller of the personal data, and is strictly limited in its scope. This means that access to third-party data provided by the client is limited to those employees who require it in order to fulfil the client's order. Therein, Luisa Language Solutions is the processor of the personal data provided by the client.

5.2. Responding to enquiries

A client can contact Luisa Language Services with questions about a service via the enquiry form or chat window on the website or by sending an e-mail. We process the following personal data when we receive and respond to enquiries:

- a) Given name and surname

- b) Contact details (telephone number, e-mail address and postal address)
- c) Information provided to us by the individual of their own initiative (e.g. e-mail content and information or files attached to e-mails or website enquiry forms)

The basis for processing such data is legitimate interest.

5.3. Fulfilment of obligations arising from legislation

In certain cases, we are required to process personal data in order to comply with legal obligations. First and foremost this includes accounting obligations (reporting and document retention), but also responding to enquiries from authorities.

In such situations, the legal basis for processing personal data is the legal obligation we are required to fulfil.

6. Security of processing personal data

- 6.1. Following the principle of reasonableness, Luisa Language Solutions implements organisational, physical and information technology security measures in order to protect personal data.
- 6.2. In certain cases, Luisa Language Solutions may use processors for the processing of personal data and the provision of services. Luisa Language Solutions ensures that processors process personal data as instructed by Luisa Language Solutions, in accordance with applicable law and by implementing relevant security measures. Confidentiality agreements are entered into with all processors.
- 6.3. Luisa Language Solutions immediately notifies data subjects of any breaches of personal data.

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

- 7.1. Proceeding from purposes strictly limited to necessity, Luisa Language Solutions may transmit personal data to third parties and authorised persons in accordance with the following principles:
 - 7.1.1. Personal data are transmitted solely for the performance of the agreed work (i.e. for the provision of the service).
 - 7.1.2. Depending on the nature of the work (e.g. the language combination of a translation), situations can arise which require the cross-border transmission of personal data to partners.
 - 7.1.3. Luisa Language Solutions confirms that it implements appropriate security measures for the cross-border transmission of personal data.
 - 7.1.4. Luisa Language Solutions confirms that it only transmits personal data to third parties and processors who implement adequate security measures to ensure the security of personal data protection.

8. Processing of personal data of minors

Luisa Language Solutions understands that ensuring security in the processing of the personal data of minors is very important, and therefore implements all relevant administrative and technological security measures in this regard. As the processor, Luisa Language Solutions only processes the personal data of minors for the provision of a service if the document required for the provision of said service includes such personal data.

9. Rights of data subjects

Data subjects have the right to:

- 9.1. have their personal data erased;
- 9.2. make enquiries regarding the personal data they have submitted to Luisa Language Solutions;
- 9.3. restrict the processing of their personal data; and/or
- 9.4. lodge a complaint about the processing of personal data with the Data Protection Inspectorate.

10. Storage of personal data

- 10.1. Luisa Language Solutions only retains personal data for as long as is necessary for the fulfilment of a contract or if it is justified for the purposes of processing personal data, after which the data are erased and/or destroyed. The retention period for personal data depends on the data type. The same personal data may be stored for different purposes. For example, some personal data may be retained because of legal requirements, even if it they are erased or destroyed for other purposes.
- 10.2. In general, Luisa Language Solutions retains personal data for the duration of a contractual relationship and for one year after the contract comes to an end, unless otherwise agreed between the recipient of the service and Luisa Language Solutions.
- 10.3. Due to the fulfilment of legal obligations (e.g. taxation and accounting legislation), personal data are retained for the period required by law (e.g. data related to accounting are retained for seven years + the current year). In this case, personal data are only used for the fulfilment of relevant obligations.
- 10.4. Luisa Language Solutions securely erases and/or destroys any personal data for which there is no purpose in retaining.

11. Use of cookies

- 11.1. The website managed by Luisa Language Solutions (www.luisa.ee) may use cookies in order to make the use of the website smoother and more convenient.
- 11.2. A cookie is a small text file which is automatically saved by the web browser on the device being used by the individual. We use cookies to:
 - a) collect generalised statistics regarding the use of the website (e.g. the number of visitors and analysis of patterns of use); and
 - b) improve the user experience and ensure the functionality of the website.
- 11.3. Users can restrict the saving of cookies and block or delete cookies via their browser settings. The website may not work properly and not all services may be available if cookies are not allowed.

12. Amendments to Privacy Policy

Luisa Language Solutions values the privacy of individuals, and therefore updates this Privacy Policy on a regular basis. The latest version of the Privacy Policy is always published on the website.

13. Contact details

If you have any questions, concerns or proposals regarding the processing of personal data, you can contact the controller using the following details:

Kristiina Püttsepp

Luisa Language Solutions

Rotermanni 7, 10151 Tallinn

kristiina@luisa.ee