



PRIVACY NOTICE

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1. INTRODUCTION

Quo Vadis Services Ltd (registered seat: H-1147 Budapest, Zsolnay Vilmos utca 3. 4. em. 2., Hungary; tax number: 24874155-2-42; Community tax number: HU24874155) as service provider (hereinafter referred to as the „**Data Controller**” or „**Company**”) agrees to be bound by the content of this Privacy Notice. Company undertakes to ensure that all data processing in relation to its activities complies with the requirements set out in this Notice and in the applicable national laws, as well as the legal acts of the European Union.

The Privacy Notice is available at and may be downloaded from the “Privacy Notice” menu option on the www.lexpertistranslation.com website.

Company reserves the right to amend this Privacy Notice unilaterally. Company, of course, will notify the data subjects of any changes in due time.

Should you have any questions in relation to this Privacy Notice, please write to us and our colleague will answer your questions.

Company is committed to protect the personal data of its partners and clients and considers that respecting its clients’ right to informational self-determination is particularly important. Company will treat the personal data confidentially and take all safety, technical and organisational measures that guarantee data safety.

Company sets out its data processing practice as follows.

2. DETAILS OF THE DATA CONTROLLER

- 2.1. If You would like to contact Company, You may do that by using the contact details set out in this section.
- 2.2. Company will delete all emails received together with the personal data specified in Section 7 below within 10 years from disclosure.

Name: Quo Vadis Services Ltd
Registered address: H-1147 Budapest, Zsolnay Vilmos utca 3. 4. em. 2., Hungary
Tax number: 24874155-2-42
Company registration number: 01-09-187063 (registered by Budapest Regional Court as Court of Registration)
Represented by: Fanni Éva Szabó
Phone: +36 30 746 8100
Email: info@lexpertistranslation.com

3. APPLICABLE LAWS

This Privacy Notice shall primarily be governed by the provisions of the following laws:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, **GDPR**);



- Act CXII of 2011 on informational self-determination and freedom of information (hereinafter referred to as the **Privacy Act**);
- Act CVIII of 2001 on electronic commerce and on information society services (hereinafter referred to as the **Electronic Commerce Act**);
- Act XLVIII of 2008 on the basic requirements and certain restrictions of commercial advertising activities (hereinafter referred to as the **Commercial Advertising Act**).

4. DEFINITIONS

Processor means the person processing personal data in the name of data processor (for example freelancer translators working for Company or Company's bookkeeper).

Subprocessor means any subcontractor, external partner of the data processor or any employees of the foregoing (for example a payroll specialist working as an individual entrepreneur for Company's bookkeeper).

Data Processing means any operation or set of operations which 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;

Data Controller means the natural or legal person which alone or jointly with others determines the purposes of the processing of data.

Data Subject means anyone who contacts Company making enquiries about our services, i.e. for example our clients, external partners, freelancers, employees and future employees, i.e. You.

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.

5. PRINCIPLES OF DATA PROCESSING BY COMPANY

- 5.1. Personal data are processed lawfully and fairly, as well as in a manner that is transparent for You. Company will process your data based on statutory authorisation or Your voluntary consent, except for extraordinary cases provided by law. Such consent shall be a clear, definite and informed consent which is limited to the relevant purpose.
- 5.2. Personal data will be collected only for clear and lawful purposes and will not be processed in a manner that is not in compliance with such purposes.
- 5.3. Company will take all reasonable, necessary and proportionate measures to ensure that the data processed by Company be precise and updated. Company will delete or rectify any imprecise personal data without delay following your explicit request or after having learned about such imprecision officially.



5.4. By taking the appropriate technical and organisational measures, Company ensures the proper safety of Your personal data and protects such data against unauthorised or unlawful processing, accidental loss, destruction or deterioration.

5.5. Any personal data breach will be reported and addressed within the shortest deadline provided by law upon occurrence thereof.

6. DATA TRANSFER DURING EVERYDAY WORK

We may transfer data to the following organisations:

PayPal	provider of the online payment method used by our Company PayPal, Inc., 2211 North First Street, San Jose, California 95131 Privacy Notice: https://www.paypal.com/us/webapps/mpp/ua/privacy-full
UniCredit Bank	Bank handling the accounts of our Company UniCredit Bank Zrt., H-1054 Budapest, Szabadság tér 5–6., Hungary Privacy Notice (in Hungarian): https://www.unicreditbank.hu/content/dam/cee2020-pws-hu/Uzletszabalyzatok/2017/AUF_20170925_HU.pdf
Google	Company's email service provider Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States Privacy Policy: https://policies.google.com/privacy
szamlazz.hu	invoicing software used by Company KBOSS.hu Kft., H-1031 Budapest, Záhony utca 7., Hungary Privacy Notice (in Hungarian): https://www.szamlazz.hu/adatvedelem/
Kilgray	provider of memoQ CAT software Kilgray Zrt., H-5700 Gyula, Béke sugárút 14., Hungary Privacy Policy: https://www.memoq.com/en/privacy-policy
SDL	provider of SDL Trados CAT software SDL PLC, Globe House, Clivemont Road, Maidenhead, Berkshire, SL6 7DY, United Kingdom Privacy Notices: https://www.sdl.com/it/about/privacy/
dr. Domján Beatrix	Company's bookkeeper H-1094 Budapest, Miháلكovics utca 12. III/28., Hungary
Aruba	Company's hosting service provider Aruba S.p.A., Via San Clemente n. 53, Ponte San Pietro 24036 BG, Italy Privacy Policy: https://hosting.aruba.it/documents/tc-files/en/7_privacypolicyhostingcart.pdf



7. SCOPE OF PERSONAL DATA PROCESSED

7.1. Data processing in relation to contractual relationships and fee quotes

If You are a client or a future client of Company (or a contact person of the foregoing), Company may process Your following personal data:

Scope of data processed	Full name (company name), address (registered address), mailing address, phone number, email address, invoicing data and any other personal data included in the source document.
Purpose of data processing	<ul style="list-style-type: none"> - contacts and consultation; - individual fee quotes; - contracting; - contract performance; - invoicing and bookkeeping; - recovery of fees and costs due in relation to the supply of services; - enforcement of legal claims arising from contracts (e.g. complaints, warranty claims); - document handling and archiving after contract termination.
Legal bases for data processing	<ul style="list-style-type: none"> - Your consent; - statutory obligation; - the fact that the personal data in question is technically indispensable for the supply of the relevant service.
Persons entitled to access data	<ul style="list-style-type: none"> - Company's employees during the performance of their job-related duties; - Company transfers invoicing data to the system of szamlazz.hu; - Company's bookkeeper for the purposes of complying with Company's bookkeeping obligations. <p>Access to personal data is authorised by Company always in the light of the principles of data minimisation and purpose limitation.</p>
Retention period	<ul style="list-style-type: none"> - Quotes not accepted by You will be stored for 6 months following expiry thereof. - Both translatable documents and translations, as well as all documents and files related to the project, so including all personal data contained therein will be retained for up to 8 years following contract performance. This data processing is necessary for contract performance and is based on the legitimate interests of Company as data controller, as well as Your legitimate interests connected with the efficient management of subsequent similar projects.



	<ul style="list-style-type: none"> - Your personal data, which shall be recorded on accounting documents (e.g. invoice, general ledger, analytical registers), shall be retained for 8 years from recording.
You rights	<ul style="list-style-type: none"> - You may request information about which of Your personal data are being handled by Company, as well as about the circumstances of data storage and data access; - You may access Your personal data, as well as request the correction or limitation thereof; - You may object to the data processing based on legitimate interests; - You may request us to delete Your personal data (taking into account the mandatory retention periods); - if data processing by Company is based exclusively on Your consent, You may withdraw such consent at any time by sending an email to admin@lexpertistranslation.com. <p>You shall be entitled to the abovementioned rights only in relation to the processing of Your personal data.</p>
Automated decision-making	No automated decision-making is applied by Company in respect of clients and future clients (and the contact persons of the foregoing).

If You are a subcontractor or a partner of Company who is involved in the supply of services, Company may process Your following personal data:

Scope of data processed	Full name (company name), address (registered address), mailing address, phone number, email address, invoicing data, documents confirming professional qualification, professional references.
Purpose of data processing	<ul style="list-style-type: none"> - contacts and consultation; - giving fee quotes, compiling tender documents; - contracting; - contract performance; - bookkeeping; - enforcement of legal claims arising from contracts (e.g. complaints, warranty claims); - document handling and archiving after contract termination. <p>In each case, Company will request Your prior written consent to the inclusion of Your personal data in tenders or to the use of such data for other purposes.</p>



Legal bases for data processing	<ul style="list-style-type: none"> - Your consent; - statutory obligation; - the fact that the personal data in question is technically indispensable for the supply of the relevant service.
Persons entitled to access data	<ul style="list-style-type: none"> - Company's employees during the performance of their job-related duties; - Company's bookkeeper for the purposes of complying with Company's bookkeeping obligations. <p>Access to personal data is authorised by Company always in the light of the principles of data minimisation and purpose limitation.</p>
Retention period	<ul style="list-style-type: none"> - All documents and files related to the project, so including all personal data contained therein will be retained for up to 8 years following contract performance. This data processing is necessary for contract performance and is based on the legitimate interests of Company as data controller, as well as Your legitimate interests connected with the efficient management of subsequent similar projects. - Your personal data, which shall be recorded on accounting documents (e.g. invoice, general ledger, analytical registers), shall be retained for 8 years from recording.
You rights	<ul style="list-style-type: none"> - You may request information about which of Your personal data are being handled by Company, as well as about the circumstances of data storage and data access; - You may access Your personal data, as well as request the correction or limitation thereof; - You may object to the data processing based on legitimate interests; - You may request us to delete Your personal data (taking into account the mandatory retention periods); - if data processing by Company is based exclusively on Your consent, You may withdraw such consent at any time by sending an email to admin@lexpertistranslation.com. <p>You shall be entitled to the abovementioned rights only in relation to the processing of Your personal data.</p>
Automated decision-making	<p>No automated decision-making is applied in respect of a subcontractor or a partner of Company who is involved in the supply of services.</p>



If You apply for a job at Company or as a freelancer professional to collaborate with Company, Company may process Your following personal data:

Scope of data processed	Full name, address, mailing address, phone number, email address, fields of specialisation, documents confirming professional qualification, professional references and other data included in the curriculum vitae.
Purpose of data processing	<ul style="list-style-type: none"> - establishing contacts; - selection procedure; - entry into the internal database; - contracting; - contract performance. <p>Company will not use Your personal data for any other purpose.</p>
Legal bases for data processing	Your consent.
Persons entitled to access data	<ul style="list-style-type: none"> - Company's employees during the performance of their job-related duties. <p>Access to personal data is authorised by Company always in the light of the principles of data minimisation and purpose limitation.</p>
Retention period	<ul style="list-style-type: none"> - Your job application will be stored for 2 years; - in any other cases, Your application will be stored until withdrawal of Your consent.
You rights	<ul style="list-style-type: none"> - You may request information about which of Your personal data are being handled by Company, as well as about the circumstances of data storage and data access; - You may access Your personal data, as well as request the correction or limitation thereof; - You may object to the data processing based on legitimate interests; - You may request us to delete Your personal data (taking into account the mandatory retention periods); - You may withdraw Your consent at any time by sending an email to admin@lexpertistranslation.com. <p>You shall be entitled to the abovementioned rights only in relation to the processing of Your personal data.</p>



Automated decision-making	No automated decision making will be applied in respect of persons applying for a job at Company or as a freelancer professional to collaborate with Company.
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7.2. Technical data

Company will choose and operate IT devices used for the supply of services ensuring that the processed data

- is accessible to the authorised persons (availability);
- is authentic and authenticated (authenticity of data processing);
- can be confirmed as being unchanged (data integrity);
- protected against unauthorised access (data confidentiality).

Company shall protect, through appropriate measures, Your data against unauthorised access, alteration, transfer, disclosure by transmission or deletion as well as destruction and accidental destruction.

Company ensures the safety of data processing by technical and organisational means that provide an appropriate level of protection against the risks arising in connection with data processing.

During data processing, Company maintains

- confidence: protects the data in order that they may be accessed only by authorised persons;
- integrity: protects accuracy and completeness of the data and the processing method;
- availability: ensures that the authorised users be able to access the data sought and that the related means be available.

7.3. Cookies

Company's Cookie Policy can be found and is downloadable from the "Cookie Policy" option at www.lexpertistranslation.com.

8. COMPANY AS DATA PROCESSOR

If You engage Company with the supply of translation, proofreading, DTP or other language services, Company acts as data processor in respect of the documents and files to be processed. You are the holder of the data processing rights in respect of the documents and files to be processed, You shall determine the purposes for which such documents and files are to be processed. Liability for data processing is shared between Company and You.

All translatable documents and files will be processed in accordance with the applicable personal data protection regulations and best practices.

Persons entitled to access data	- Company's employees (primarily our project managers) during the performance of their job-related duties;
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	<p>- Company's subcontractors, freelance collaborators as subprocessors for the purposes of performing tasks requiring specialist knowledge (subject to a confidentiality undertaking and the provision of appropriate data protection guarantees).</p> <p>Company shall transmit the materials completed to You through a safe channel. In case of personal delivery, Company delivers the completed material only after having been confirmed beyond doubt that the person receiving such material acts on Your behalf.</p>
Retention period	<p>By engaging Company, You express that You hold legitimate interest in receiving always the most advantageous fee quote from Company. For this purpose, Company shall be entitled to use Your previous translations.</p> <p>All project-related files and documents will be retained for 8 years from contract performance.</p>

9. SUBMISSION OF COMPLAINT TO THE COMPETENT AUTHORITY

If You consider that Company as data controller infringed the law relating to the processing of Your personal data, You may submit a complaint to the National Authority for Data Protection and Freedom of Information as follows:

National Authority for Data Protection and Freedom of Information

Address: H-1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Mailing address: H-1530 Budapest, P.O. Box: 5.

Phone: +36-1-391-1400

Fax: +36-1-391-1410

Email: ugyfelszolgalat@naih.hu

Website: <http://www.naih.hu/panaszuegyintezes-rendje.html>

10. SEEKING REMEDY FROM COURT

You may seek remedy from court upon infringement of Your rights. The court shall hear such cases in priority proceedings.

11. OTHER PROVISIONS

11.1. This Privacy Notice has been drafted in Hungarian and English. In case of any discrepancy among the two language versions, the Hungarian version shall prevail.

11.2. This Privacy Notice shall be governed by the Hungarian law.

Budapest, 25 May 2018