

# Pilirodriguezdeus.com

## Privacy statement

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Under data protection legislation (GDPR) we are required to inform you of how we will process any information that we hold in relation to you.

### GDPR GLOSSARY

#### *Personal data*

Information that can identify a natural person (an individual not a company). Examples: name, photographs, a postal address, an IP address.

#### *Special categories of personal data*

Personal data that is considered more sensitive. Examples: race, religion, sexual orientation.

#### *Controller*

The person that decides why and how the data is processed.

#### *Processor*

The person that handles the information on behalf of the controller.

### Who I am

®**Pilirodriguezdeus.com** is the trading of Pili Rodríguez Deus, a translator, interpreter and proofreader based in Southampton, UK. As a small business, I collect, store and process personal data. As a sole trader, I am the data controller and processor of that data.

### Why I care about your privacy and personal data

First, as an individual. I had my photo and full name stolen from public social media in July 2019, therefore, I know how having your data compromised feels. Additionally, it is my legal obligation as a business to take steps to ensure that your personal data is handled safely, only for lawful purposes, and only while needed.

I have undertaken GDPR training:

- ✓ I have watched the Institute of Translation and Interpreting (ITI)'s webinar on GDPR, presented by a lawyer;
- ✓ a talk with practical advice by Irene Koukia (translator) presented in the BP19 Conference;
- ✓ I have completed the self-assessment for small businesses on the British Information Commissioner's Office website (ICO): <https://ico.org.uk/>

## My legal basis for processing your data

My main legal bases for storing and processing your personal information are:

- 1) To perform a contract
- 2) To comply with legal requirements, such as HMRC tax returns and investigations.

Occasionally, the legal basis will be **consent**, for example, when you entrust a personal document (e.g. a medical certificate) to me for translation. If I translate a personal document for a translation agency, I sign a confidentiality agreement with them, and they will sign one with you.

## YOUR QUESTIONS ANSWERED

### Q1. What kind of personal data do you hold? An overview.

Please read the rest of the document for more detailed information.

What I collect	From whom	Why
<ul style="list-style-type: none"> <li>• Names and contact details – postal and email addresses, telephone numbers</li> <li>• Payment details, including bank account details and payment history.</li> </ul>	<ul style="list-style-type: none"> <li>• Current, past and prospective clients</li> <li>• Direct clients and translation agency staff</li> <li>• Collaborators such as proofreaders</li> </ul>	<ul style="list-style-type: none"> <li>• For communication purposes</li> <li>• For payment, accounting and tax purposes</li> <li>• Out of legitimate interest in working with you again or in future</li> </ul>
Where	For how long	Can I opt out?
<ul style="list-style-type: none"> <li>• Contact lists on my personal devices</li> <li>• Tracking sheets, quotes and invoices on my personal devices and backup storage (cloud provider and pen drive)</li> <li>• Translation files</li> </ul>	<ul style="list-style-type: none"> <li>• As a sole trader, I have a legal obligation to keep relevant business records for 5 years following a tax return. I will keep quotes, invoices and emails.</li> <li>• I will delete quotes after a year if we did not enter into a contract.</li> </ul>	<ul style="list-style-type: none"> <li>• NOT if we entered a contract. It is a business' legal requirement to keep financial records.</li> <li>• YES, of unwanted advertising. See Q8.</li> </ul>
Do you share any of my data?		
<p>YES AND NO</p> <ul style="list-style-type: none"> <li>• I share relevant data with HMRC and with my bank. Both are GDPR compliant. I may also need to share your identity with the authorities in cases of non-payment or other circumstances. For example, I recently referred a fraudster for identity theft.</li> <li>• I do not share any of your data with any other third parties unless, for example, you ask me to recommend a colleague or be recommended. At present, I do not employ an accountant. If I need to send your text to a colleague for revision or proofreading, it will be anonymised.</li> </ul>		

## *Cookies and the world wide web*

When you visit my social media profiles (e.g Twitter) or professional profiles (LinkedIn; webpage), these platforms use cookies to track the number and type of visitors. As with any website, you can disable cookies on your device. Additionally, you can adjust your privacy settings on your personal devices and social media accounts.

## *Translation Memories (TMs) and Translation files or packages*

**Confidentiality.** TMs and translation files/packages are part and parcel of my work and may contain identifying data relating to direct or indirect clients. Whether you are a direct or an indirect client, I abide by ITI's Code of Conduct, which you can download here: <https://www.iti.org.uk/about-iti/professional-standards> . Confidentiality clauses are included in my Terms and Conditions when working directly with you and in the LSP's Non-Disclosure Agreements (NDA) or Data Processing Agreements (DPA) that I sign when collaborating with them.

**Security.** Translation memories and files are stored securely on my PC, laptop and my backup storage: a cloud-storage provider and an external hard drive. Only I have access to these files. All devices are password protected. Translation files or packages are emailed to you or shared via OneDrive using a password, which is sent separately from the files.

## Q2. How come you have my personal information?

There are three scenarios:

- 1) You provided it when you approached me for a job or when we entered into a contract.
- 2) You were referred by a colleague.
- 3) It was publicly available on your website, your social media, translation portals such as Proz or public company listings such as ITI's. In this case, if I contact you, you will get an opt-out clause and you may inform me in writing if you do not wish to be approached again.

## Q3. Do you hold any special category data about me?

**NOT USUALLY.**

I do not store any special categories of personal data for my translation/interpreting clients. The exception would be if I translated a personal document (e.g. a medical certificate). In that case, the document would be password-protected and deleted following your or the LSP's instructions. I may keep an anonymised copy for the purpose of re-using the general content.

## Q4. How can I be sure that my information is accurate?

My email footers include a reminder to you to check that your contact details are correct. You should always provide your new [contact details](#) in order to prevent communication failure and your new [banking details](#) to ensure payment, if applicable.

## Q5. What's your strategy to keep my personal data safe and prevent data loss?

1. I try to minimize paper records, but I have a small lockable cabinet for these.
2. I use a shredder to destroy any paper records and receipts.
3. I lock my computer whenever I leave my desk as my partner also works from home.

4. All my devices (mobile, laptop, PC) are password protected.
5. I use safe passwords and, therefore, I use a password manager.
6. I use two-step verification for more sensitive sites.
7. All my devices have antivirus and malware software installed and are automatically updated.
8. All my software is regularly updated, including IT and CAT (computer-assisted-technology) tools, in order to maximize functionality and safety.
9. Confidential files are password-protected when returned to you and passwords sent separately.
10. I currently keep two copies of everything: one on my desktop PC and one on the cloud, and they are continuously being synchronized. I just acquired a separate storage drive for extra security, and I plan to investigate encryption software.

#### Q6. What's your policy for disposing of personal data?

I shred/delete your personal data from my records/systems:

- After 5 years, if I no longer need it.
- When you ask me in writing, if I am not legally required to keep it.

#### Q7. What rights do I have regarding my personal data?

1. To be informed of what information is held about you and how it will be used (privacy notices).
2. To request a copy of the information held about you.
3. To request that inaccurate or incomplete information about you be rectified.
4. To request deletion or removal of information about you (the right to 'be forgotten').
5. To limit the amount or type of data stored about you.
6. To object to processing of information about you (only if used for advertising purposes).
7. To withdraw consent at any time where your information is being processed on that basis.
8. To lodge a complaint with the Information Commissioner's Office in relation to processing of information about you. Visit <https://ico.org.uk/make-a-complaint/>.

#### Q8. How do I exercise those rights?

You may contact me in writing at any time to request a copy, rectification or erasure of your personal data. I will act without undue delay and in always within one month of receipt of your request. Please email [pili@pilirodriguezdeus.com](mailto:pili@pilirodriguezdeus.com).

Note that consent is not a pre-requisite to store your data for legal purposes. If you are still unhappy after contacting me, the data controller, you can lodge a complaint with ICO. Visit their website: <https://ico.org.uk/make-a-complaint/>.

See page 5 for useful links and contact details.

## USEFUL LINKS

My main current target market is the UK; therefore, this privacy notice is in English. If you need general information in Spanish or French, you can find it on the pages listed below. A translation of my privacy notice is forthcoming.

Spanish: <https://www.aepd.es/>. Particularly useful:

<https://www.aepd.es/reglamento/derechos/index.html>

<https://www.aepd.es/media/infografias/infografia-rgpd-derechos-ciudadanos-aepd.pdf>

French:

[https://europa.eu/youreurope/citizens/consumers/internet-telecoms/data-protection-online-privacy/index\\_fr.htm](https://europa.eu/youreurope/citizens/consumers/internet-telecoms/data-protection-online-privacy/index_fr.htm)

## CONTACT DETAILS

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