

Confidential

Welocalize Inc

**ISO 27701: Policies and Controls
Welocalize Website Privacy Notice**



welocalize

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Welcome to the Welocalize Privacy Notice

Protecting your privacy is important to Welocalize. We strive to keep your personal information confidential. By ensuring that you are aware of and understand the Welocalize Customer Privacy Notice, we can provide you with better service. Please take a moment to read the following notice to learn how we handle your personal information.

This information has been produced to help you understand everything you need to know about the way Welocalize collects, uses, and shares personal data, what your legal rights are and how to exercise them.

We hope you'll take some time to read this document; we've tried to keep it all as simple as possible and to avoid jargon, and we'll make our best efforts to keep you informed if there are any changes to the way we process your personal data in the future.

Welocalize takes its responsibility for protecting your data very seriously and we do advise you get to know our practices. If there's anything here you don't understand, or if you want to ask any questions, please feel free to contact us.

The Welocalize Privacy Notice is subject to change at any time. We encourage you to review the privacy notice regularly for any changes.

Who is the Data Controller?

We are Welocalize Inc. This privacy notice covers the subsidiaries [listed here](#).

Registered address: 136 Madison Avenue, 6th Floor, New York, NY 10016

In this document Welocalize may be referred to as "we", "us", or "our".

What kinds of Personal Data does Welocalize Process?

Welocalize collects personal data for various purposes; with that in mind we have created a list of the types of personal data that we may collect, either directly from yourself or from other sources, in order to achieve those purposes.

The kinds of personal data we may collect include:

Customer	Name, Employer, Job Title, Address, Email, Telephone Number
Applicant	Name, Address, Telephone number, Email address, Work History, Education History, Tax Information
Vendor	Name, Address, Email, Telephone Number, Bank Details, Education History
Supplier	Name, Address, Email, Telephone Number, Bank Details, Education History

Contractor	Name, Address, Email, Telephone Number, Bank Details, Education History, Tax Information
Third Party Suppliers	Name, Address, Email, Telephone Number, Bank Details

What are the reasons Welocalize collects Personal Data?

Legal Obligations

Welocalize uses personal data firstly to fulfil any contractual obligations that exist between us and you. Where we request personal data be provided to enter into, or meet the terms of any such contract, you will be required to provide the relevant personal data or we will not be able to deliver the goods or services you want. In such cases, the lawful basis of us processing the personal data is that it is necessary for the performance of a contract.

We are required by law to process personal data for purposes relating to our legal obligations, these include:

- To provide for our financial commitments, or to relevant financial authorities.
- To comply with regulatory requirements and any self-regulatory schemes.
- To carry out required business operations and due diligence.
- To cooperate with relevant authorities for reporting criminal activity, or to detect and prevent fraud.
- To investigate any insurance claims, claims of unfair dismissal, claims of any kind of harassment or of discrimination, or any other claim whereby the organization may have to defend itself.

Consent

Welocalize may process Personal Data for the following purposes where it has received consent to do so:

- Provide ongoing marketing

You may withdraw your consent for us to process your personal data for these purposes at any time; after a request to withdraw consent is received, we may have to contact you to verify the request.

Withdrawing your consent for us to process your personal data will not affect the lawfulness of the processing beforehand.

Legitimate Interests

Welocalize may process Personal Data for any of the following purposes, which are considered to be within our legitimate business interests:

- To provide goods and services where it has been requested;
- To inform customers of goods and services we provide or offers that may interest them;
- To send notification on subjects to individuals who have asked to be kept informed;
- To invite people to participate in research in fields and disciplines they are interested in;

- To send notifications of any changes to the goods and/or services provided that may affect people;
- To allow the organization to support and maintain our products in active service;
- To enhance the security measures in place that protect data we are responsible for; and/or
- To protect the organizations assets.

Where does Welocalize obtain Personal Data from?

Welocalize collects Personal Information in the following manner:

- when you contact us by completing a form on our website or that of a third party
- when you contact us for information, questions or requests
- when you participate in an online survey
- when you request to be included in an e-newsletter mailing list

Who will Welocalize share your Personal Data with?

To achieve the above stated purposes for which we process your personal data, we may have to share your personal data with certain third parties.

We shall make all reasonable efforts to ensure that any third-party we share your personal data with is also compliant with data protection law.

The kinds of third parties we may share your personal data with include:

- Other members of a group of companies to which Welocalize belongs
- Organizations where it is necessary to provide goods or services
- Organizations where it is necessary to setup various resources

The specific types of third-party Welocalize may share your personal data with include:

Pardot	Marketing Automation
Salesforce	CRM
Survey Monkey	Brand Insights, Market Insights, Product Experience, Customer Experience,
Mailchimp	Email Marketing
Drift	Our Website Chatbot

Google Analytics	Website Analytics
PayPal, Hyperwallet	Payment Systems

Where will Welocalize store your Personal Data?

As a part of our standard business practices, we will transfer appropriate data to countries outside the European Union (EU), or to organizations who intend to transfer the data outside the EU and more specifically, to the United States.

Where data is transferred to the United States, specific safeguards have been established.

Where data is transferred to international organizations, we shall ensure that specific safeguards or derogations have been established.

These might include where the data transfer is necessary in order to fulfill a contract between us and you, where we have received your specific consent after having made you aware of the risks involved, or where approved contracts are in place between us and the third parties, ensuring the recipient organization has a suitable standard of data protection in place.

How long will Welocalize keep your Personal Data?

We will keep your personal data only for as long as required to achieve the purposes for which it was collected, in line with this privacy notice.

The following criteria are what determine the period for which we will keep your personal data:

- Until we are no longer required to do so to comply with regulatory requirements or financial obligations.
- Until we are no longer required to do so by any law we are subject to.
- Until all purposes for which the data was originally gathered have become irrelevant or obsolete.

Your Rights, Our Responsibility

There are several rights granted to you immediately upon providing us with your personal information; some of these are mentioned below. We'd like you to know that at Welocalize we take your rights seriously and will always conduct ourselves in a way that is considerate of our responsibility to serve your legal rights.

If you wish to opt out of data collection entirely or request that we delete your stored personal information, we give you some tools to assist in sending your request to us:

- Utilize the Welocalize [Data Subject Request Form](#)
- Contact Welocalize [Privacy Department](#) via email

The Right of Access

This grants you the right to confirm whether or not your personal data is being processed, and to be provided with relevant details of what those processing operations are and what personal data of yours is being processed.

If you would like access to the personal data we have about you, we ask that you contact us using the details below.

The Right to Rectification

This one is fairly straight forward; if you notice that the data we have about you is inaccurate or incomplete, you may request we rectify the mistake. We will make every effort to respond to requests of this type immediately.

The Right to Erasure

Otherwise known as the 'right to be forgotten', this gives you the right to request your personal data be deleted.

This is not an absolute right; if you were to request that we erase your personal data, we would erase as much of that data as we could but may have to retain some information if it is necessary.

Where we have received a request for personal data to be erased, if it is necessary for us to retain some of that information we shall ensure that the remaining data is used only when and where it is absolutely necessary.

The Right to Objection

The right to object is a basic freedom all democracies enjoy. If you wish to object to the way we use, or have used, your personal data you may do so freely.

The Right to Complain

We will always try to maintain the highest standards and encourage the confidence our customers have in us as an organization. In order that we can achieve this we do request that any complaints be first brought to our attention so we can properly investigate matters; if however you would like to complain about Welocalize to a supervisory authority you may do so by contacting your country specific supervisory authority.

In relation to access of personal data, individuals may make a request for access verbally or in writing. They will not be charged for receipt of a copy of their personal data (unless that the request is manifestly unfounded or excessive) and they will be provided with such copy as soon as reasonably practicable and in any event well within the statutory timelines, i.e. within a month of receipt of the request.

Welocalize commits to resolve complaints about our collection or use of your personal information. Individuals with inquiries or complaints regarding our Privacy policy should first contact Welocalize at: privacy@welocalize.com

If you would like to complain about Welocalize to a regulatory body, you may do so by contacting your [local data protection supervisory authority](#).

California Privacy

The California Consumer Privacy Act ("CCPA") provides consumers with specific rights regarding their Personal Information. You have the right to request that businesses subject to the CCPA (which may include our Members with whom you have a relationship) disclose certain information to you about their collection and use of your Personal Information over the past 12 months. In addition, you have the right to ask such businesses to delete Personal Information collected from you, subject to certain exceptions. If the business sells Personal Information, you have a right to opt-out of that sale. Finally, a business cannot discriminate against you for exercising a CCPA right.

When offering services to its Members, Welocalize acts as a “service provider” under the CCPA and our receipt and collection of any consumer Personal Information is completed on behalf of our Members in order for us to provide the Service. Please direct any requests for access or deletion of your Personal Information under the CCPA to the Member with whom you have a direct relationship.

Do not Track

Certain state laws require us to indicate whether we honor “Do Not Track” settings in your browser. Welocalize adheres to the standards set out in this Privacy Policy and does not monitor or follow any Do Not Track browser requests.

U.S. Data Privacy Framework

Welocalize, Inc. and its wholly owned US subsidiaries, Welocalize AI Services, LLC, Welocalize Integration Services, LLC and Next Level Globalization, Inc. all comply with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce.

Welocalize has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF.

Welocalize has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF.

If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern.

To learn more about the Data Privacy Framework (DPF) Program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

Individuals with inquiries or complaints regarding our handling of their personal data should:

- Utilize the Welocalize [Data Subject Request Form](#), or
- Contact Welocalize [Privacy Department](#) via email

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Welocalize commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner’s Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF.

Should you have a complaint, binding arbitration is available to address residual complaints not resolved by other means. Welocalize is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

In the context of an onward transfer of personal data to a third party, Welocalize has responsibility for the processing of personal data it receives under the DPF and subsequently transfers to a third party acting as an agent on our behalf. Welocalize remains liable under the DPF if our third party agent processes such personal information in a manner inconsistent with the DPF, unless we can prove that we are not responsible for the event giving rise to the damage.

Welocalize Contact Details

Welocalize Inc

136 Madison Avenue, 6th Floor, New York, NY 10016

privacy @welocalize.com

Who is the Welocalize Data Protection Officer?

Ametros Group Ltd

Lakeside Offices, Herefordshire, England HR2 6JT

privacy@welocalize.com