



## **PRIVACY NOTICE FOR EXISTING DISKUSIJA CLIENTS**

DISKUSIJA, UAB, located and registered in Lithuania with company tax ID No. 122152773, VAT No. LT221527716, registered office Aukštaičių g. 7, LT-11341 Vilnius, LITHUANIA, e-mail [diskusija@diskusija.lt](mailto:diskusija@diskusija.lt) (hereinafter referred to as “Diskusija”, “we”, “us”, or “our”), values privacy. We care about processing all the personal data we have access to in a strictly legal way and we want you to be informed and understand how and why we collect and use your personal data and with whom we share it.

This Privacy Notice is intended for existing Diskusija clients. By “clients”, we hereafter mean:

- clients we have signed contracts with (including Framework agreements, Service level agreements, Sub-contractor agreements, and similar agreements)
- clients we have worked for or previously provided a quote/estimate to;
- clients who have expressed an interest in potential cooperation or expressed an interest in cooperation on an *as-needed basis* (expressed orally during our meetings, asked to complete vendor experience evaluation questionnaires (including online registration forms), asked to provide price lists, required test translations, etc.)

**Due to the nature of our work, we are dividing this Privacy Notice into two parts. Part 1 is about your personal data we collect and use in the course of our business relationship with you. Part 2 concerns personal data which may be present in the files and documentation you provide us as part of our service to you.**

### **Part 1: Your personal data**

Diskusija acts as a data controller of the personal data we process about you, which are needed to maintain the relationship between us and you or your organisation.

#### **What personal data do we collect about you?**

We collect the following personal data: your name and surname, your contact details (email, phone number, etc.); if you represent an organisation, we collect the following data about your organisation: name, address, ftp/file transfer platform login details (if any) and your job title; we also collect information about the history of our interactions with you or your organisation, information about the jobs you have ordered from us or quotes we have prepared for you.

#### **How do we collect your data?**

We collect personal data about you from various sources. Some personal data are directly obtained from you (name, surname, job title, contact details, etc.) or from your co-workers introducing you to us as a point of contact for dealing with concerning particular jobs, enquiries, negotiation stages, etc. There are also certain personal data that are created in the course of our relationship with you or your organisation. Finally, we also collect some personal data about you from public sources such as your organisation’s website and your LinkedIn profile.

#### **For what purposes will your personal data be used?**

We will use your personal data for the following purposes:



- to fulfil a contract with you or the organisation that you work for or represent on other bases;
- to provide the services you order and to respond to your queries;
- to maintain our business relationship and to provide you or your organisation with business proposals and on-going organisational updates;
- to comply with legal obligations;
- for marketing purposes, including sending you marketing materials about Diskusija and its services by email (unless you have indicated that you do not want to receive these marketing materials). In that case you always retain your right to unsubscribe from the Diskusija marketing messages.

### **On what legal basis do we process your personal data?**

We process your personal data on the legal basis of:

- **legitimate interest** in order to: provide our services to you and deal with your enquiries, evaluate and improve our services, improve our ability to understand your business needs, keep you informed and updated about our relevant services, etc.;
- **a contract** we have entered in with you or your organisation, or of which we are in the pre-contract stage;
- **a legal obligation** in order to report to the local tax authorities and other state/EU bodies, to store the data for the period designated by law.

### **How long do we keep your data?**

We will always keep your personal data as long as you or your organisation are using our services or have a valid contract with us. We will also hold the data until ten years from your last communication, or that of your organisation, with us. We will also keep your personal data where required by law or where we need to do so in connection with potential or actual legal or insurance-related actions, or an investigation involving Diskusija. However, you can always opt-out from the use of your data for marketing purposes.

### **With whom do we share your personal data?**

- Your personal data is processed by our staff in Lithuania and stored on our local servers. However, for some IT hosting and maintenance purposes, this information is located on servers and accessible to authorised employees of certain Diskusija suppliers.
- Access to individual personal data is granted only to those members of our team who need these data for the fulfilment of their duties.
- In order to fulfil our legal duties, your personal and financial data will be shared with local tax and other competent authorities.

### **Your rights**

- You are entitled to opt out from the processing of your personal data for direct marketing purposes.
- You have the right to request a report on what personal data we have about you by requesting a “registry extract”. This can be made free of charge once a year.
- You also have the right to request that incorrect information about you be corrected, as well as the ability to request the removal of your personal data or the restriction of its processing.



- For any request, please contact us by email at [diskusija@diskusija.lt](mailto:diskusija@diskusija.lt) for more information.
- If you wish to raise a complaint on how we have handled your personal data, you can contact us by email at [diskusija@diskusija.lt](mailto:diskusija@diskusija.lt) to have the matter investigated. The template for a data subject's request to implement his/her rights is available on our website [www.diskusija.lt](http://www.diskusija.lt).
- If you are not satisfied with our response or believe we are processing your personal data in breach of the law you can complain to the national supervisory authority of Lithuania - State Data Protection Inspectorate <https://www.ada.lt/go.php/eng/img>.

## **Part 2: Personal data contained in files or documentation**

You are the controller of the personal data contained in the files and documentation submitted to us for the provision of the service.

As an initial data controller, you are obliged to ensure that you have received the consent of the data subject, or you are acting on another legal basis to transfer files and documents containing the personal data of the data subject to us. Please be advised that, in cases where the documents you submit to us contain the personal data of other data subjects, we do not specifically inform those persons about the processing of their personal data. This is due to the fact that, for that purpose we would need to additionally collect and process the contact data of those data subjects, and this would involve a disproportionate effort with respect to the objectives pursued (Item b of Article 14(5) of the General Data Protection Regulation). Complete information about the processing of such data is provided in this section of the notice. Therefore, you are kindly requested to introduce other persons to the present privacy notice when transferring their data to us.

In this case, Diskusija is acting as the processor of personal data that processes the data according to the instructions it receives from you as the controller. We will make every effort to determine whether or not the files and documents submitted by you contain any personal data. However, you remain responsible for notifying us in advance and providing the relevant data processing instructions.

In view of the specifics of the language industry, to be able to fulfil our contractual obligations (i.e. provide a service to you or submit an offer) we have to engage vendors (translators, editors, DTP specialists, language service companies, etc.) that act as data sub-processors.

### **What do we do with the personal data contained in files and documentation?**

The personal data contained in files and documentation shall be processed only in the overall context of the file or the document. No personal data can be extracted from the context and processed separately.

The files are stored on our local servers and their backup copies. Furthermore, the data is shared with our reliable and approved vendors by secure communication means for the purpose of pre-contractual evaluation of the service scope and price and/or execution of the contract.



### **Data transfer to third countries**

In order to be able to fulfil certain orders, we have to transfer data to vendors located outside the EU/EEA, and outside the countries included on the list of GDPR-compliant countries approved by the EC. In most cases, this happens because the most suitable and best vendors to translate into the respective languages reside and work in the countries in which the language concerned is spoken. This way they are best familiar with the nuances of the language and are able to maintain its natural fluency. Furthermore, this is the best way to maintain the price and quality ratio. Therefore, when ordering translations into languages other than EU/EEA languages, you may reasonably expect that the documents and files will be sent outside the EU and EEA. In this case, however, we will inform you in advance. It is up to you to make sure the data subject is also aware of this and gain their explicit consent.

We take all necessary steps to ensure that the persons to whom we transfer data in those countries commit to ensuring an adequate level of protection for your personal data.

### **Special categories of personal data**

If your files or documents contain special categories of personal data belonging to a third-party data subject, it is your obligation to obtain the relevant consent and establish lawful grounds for the processing of that data according to articles 6 and 9 of GDPR.

We might ask you to redact identifiable information in order for us to minimise the risk to the data subject before commencing the service we provide to you, especially if the contract would necessitate sending the files or documentation to providers outside of the EU/EEA.

### **How long do we keep your data?**

We store all the files that you submit to us to provide the services and all their versions (the original file, the translation, the edited file, final file, etc.) in our secure translation management system for 10 years, after which the files are destroyed. However, you have the right to request at any time the deletion of all versions of the files containing your personal data, and we will comply, provided we no longer have a legal interest in retaining such data.

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- If you wish to raise a complaint on how we have handled your personal data, you can contact us by email at [diskusija@diskusija.lt](mailto:diskusija@diskusija.lt) to have the matter investigated.
- If you are not satisfied with our response or believe we are processing your personal data



in breach of the law, you can submit a complaint to the national supervisory authority of Lithuania - State Data Protection Inspectorate <https://www.ada.lt/go.php/eng/img>.

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