

Privacy Shield Statement / Policy

Privacy policy

German Language Services (GLS) is a small business that provides specialized German/English translation services. GLS cares about the right to protection of privacy. This document describes our interaction with the information we receive from clients and visitors to our website, and how we use that information.

GLS complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. GLS has certified to the U.S. Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>. This policy is effective as of October 14, 2020.

Type of data collected

GLS collects personal data from clients, employees, service providers, and job applicants. Personal information is processed in the form of first and last names, email addresses, phone numbers, physical mailing addresses, job titles, education and training (for human resources purposes only), business terms, and other information supplied by our business contacts in order that we may provide requested services. Additionally, such information is used for accounting and business communication purposes. GLS also processes names and contact information provided to us in an unsolicited fashion by interested parties via our website to fulfill requests for information about our services. Beyond this, GLS does not track or monitor our website visitors nor do we use cookies to log data about our website users.

Purpose of data collection

GLS collects and processes data submitted by customers, employees, service providers, and job applicants exclusively for business purposes. GLS uses the data to provide requested services, for accounting and internal communication purposes, and for confidential client interactions. GLS does not use personal information to create marketing databases or client profiles.

Use of information

The information stored at GLS is used exclusively to provide services to our clients and enable contact with our vendors. We do not use the data we have collected for any marketing or data aggregation purposes.

Choice

Under the Privacy Shield principles, individuals have the right to opt out of (a) disclosures of their personal information to third parties or (b) uses of their personal information.

Independent recourse mechanism for complaints by EU individuals

In compliance with the Privacy Shield Principles, GLS commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact GLS at info@germanlanguageservices.com.

GLS has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU in the context of the employment relationship. Additionally, GLS has

Privacy Shield Statement / Policy

engaged the ICDR/AAA private sector dispute resolution program as an independent recourse mechanism for dispute resolution.

Type of third parties to which personal information is disclosed

GLS uses contracted third parties to fulfill certain business services; these contracted parties do not generally come into contact with the personal information provided to GLS. However, from time to time data may be transferred to such contracted third parties to fulfill a business or HR requirement. The third parties are restricted in the use of the data by contract terms between the third party and GLS that restrict the use or disclosure of personal data. GLS retains liability for ensuring that contracted third parties understand and abide by appropriate privacy practices.

Right to access personal data

Individuals have the right to request access their personal information, to correct or amend the information, or to request its deletion. To do this, email info@germanlanguageservices.com.

Sharing and disclosure

GLS does not share any personal information with others, except as may be required to fulfill business services using third party vendors such as freelance translators. Such third party vendors are restricted from use and disclosure of personal data by contract. GLS retains full responsibility for the actions of its contractors in this regard. GLS will share personal information only as required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Storing your personal data

Personal information is stored on secure local office servers and an enterprise-level secure Microsoft 365 SharePoint cloud server.

Accessing, correcting, limiting the use and disclosure of, or deleting your personal information

Data subjects have the right to access, correct, limit the use and disclosure of, or delete personal data. To do so, contact us at info@germanlanguageservices.com.

Enforcement

GLS is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). For more information about the Privacy Shield, see the U.S. Department of Commerce's Privacy Shield website located at <https://www.privacyshield.gov>.

Binding arbitration

Individuals with unresolved complaints may have the right, under limited circumstances, to bring the complaint to binding arbitration. Binding arbitration is managed by the International Center for Dispute Resolution-American Arbitration Association (ICDR-AAA).

Designated contacts

The designated contacts at GLS are Maia Costa (maia@germanlanguageservices.com) and Noelle Knapp-Lucero (noelle@germanlanguageservices.com).