

# The Hydrogen Translator Privacy Notice for Translation and Related Services

## Who I am

I am Nicola Bottrell Hayward, a freelance translator and sole trader in the United Kingdom who also operates under the business name 'The Hydrogen Translator.' I am committed to protecting the privacy and security of personal data. This privacy notice describes how I collect and use personal information in accordance with data protection law as it applies in the UK.

## My contact details

I am the main point of contact for data protection matters and am registered with the Information Commissioner's Office (registration number: ZA500693). You may contact me as follows:

Nicola Bottrell Hayward  
The Hydrogen Translator  
Epworth House  
12 Castle Street  
Thornbury  
Bristol BS35 1HB  
United Kingdom

Office: +44 (0)1454 416796  
hello@TheHydrogenTranslator.com  
www.TheHydrogenTranslator.com

## What type of information I have

The personal data I collect and hold from professional contacts may include: your name, job title, telephone number, postal address, email address, business/company name and bank account details.

For the purposes of translation and other related work, I may collect, process and store source and target texts, glossaries, translation memories and other reference material that could contain personal information. Depending on the nature of the work, this may include special categories of personal data.

## **How I get the information, why I have it and what I use it for**

In order to establish contact and to communicate effectively with visitors to my web profiles, clients, potential clients, colleagues and suppliers, some personal data needs to be collected. Some of the personal information I process is provided to me directly by you when I receive an enquiry, a business card or a text for translation or through other means of business communication.

Personal data may also be sourced indirectly through information you have supplied on outsourcing platforms or on social media sites such as LinkedIn.

This data is stored and processed so that I can provide quotations, deliver translation work and other related services, issue invoices, keep accurate and up-to-date internal records and comply with legal obligations.

I may also contact you to provide you with information about my services that I think you may genuinely be interested in because, for instance, your company is advertised on a translation outsourcing platform.

In addition, I may use a newsletter to inform my professional contacts of changes to my availability, special offers, details of my services and updates to my skills and CV. Contacts will be expressly asked to opt in if they would like to receive such a newsletter and have the right to opt out at any time. They can do so by emailing me at the address above requesting that I remove them from the mailing list or by using the link in the newsletter.

Because of the recurring nature of translation work and the need for a high level of consistency with previous translations, the source texts and target texts may be stored and processed in a translation memory system, glossary or other retrieval system. A translation memory may also be supplied to me by a client in order to complete translation work.

## **The legal basis upon which I collect personal data**

I process personal data when it is in my legitimate interest to do so, for example to operate, develop and grow my business. I also process such data in order to fulfil a contract or take steps to fulfil a contract, to meet legal obligations, such as taxation law, or where clear consent has been given.

In terms of personal data contained in source texts or other material supplied for translation or other services, I expect all clients and colleagues to ensure that the data subject has consented to their personal data being translated or otherwise processed.

### **Sharing the information**

To ensure files for a translation project are received and delivered in a secure manner, files can be sent as password-protected email attachments, transferred via a client's FTP server or downloaded from my own password-protected file transfer service.

In order to perform a translation or other related work, I may need to collaborate with a colleague. In this case the colleague must confirm compliance with the General Data Protection Regulation and abide by a privacy policy that offers a similar level of protection to that stated in this present policy.

Other third parties may have access to personal data through administrative activities such as my cloud storage provider, accountant, web platform, email hosting service, IT consultant and professional online networking sites. I will check that a declaration of compliance with the EU General Data Protection Regulation or with the United States Privacy Shield Framework exists for all third-party suppliers.

### **How I store your information**

To protect data against loss, damage and unauthorised processing, information is securely stored on a password-protected computer which is frequently updated and monitored by anti-virus software. In addition, personal data is backed up and stored frequently on a password-protected cloud storage system to enable swift recovery of data in the event of file loss or damage. Emails are also stored by a password-protected email provider.

I will keep your information for as long as it is required to operate my business, manage my agreements with you and respond to any claims or complaints. Once I decide that I no longer need your information it will be permanently deleted from my computer systems on my premises and from my back-up systems. Hard copies will be shredded. Please see below for specific details on data retention:

**Quotations:** I keep records of enquiries, estimates, quotations, including emails, source text, target text, reference material, translation memory, for a period of 6 months. This ensures I can respond quickly when a quotation is approved. If a firm order is not received within 6 months of a quotation being issued, the files will be deleted.

**Orders:** I keep records of confirmed project orders and test translations, including emails, source text, target text, reference material, translation memories, invoices, for a period of 7 years. This is in line with HMRC retention guidelines. After that, computer files will be deleted. Any documents that are printed out, for example in order to edit or proofread a piece of work, will be shredded once the project has been concluded. Translation memories and related tools will either be deleted, purged of personal data or anonymised.

**Professional contacts and written agreements:** I keep records of professional contacts, including clients, colleagues and suppliers, in order to facilitate future business dealings and notify you of changes to my service. I also hold agreements such as non-disclosure agreements and work contracts which may contain personal data. This information is held for as long as is required for legitimate business interests. When I no longer need it, this will be securely and confidentially destroyed.

If a request is made to delete files before the end of the normal retention period I cannot be held responsible for queries or claims relating to the content of the translation or other service rendered.

## **Your data protection rights**

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask me for copies of your personal information.

**Your right to rectification** - You have the right to ask me to rectify information you think is inaccurate. You also have the right to ask me to complete information you think is incomplete.

Depending on the specific lawful basis used for collecting the information, you may also in certain circumstances have the right:

- to ask me to erase your personal information
- to ask me to restrict the processing of your information
- to object to the processing of your personal data in certain circumstances or to ask that I transfer the information you gave me to another organisation, or to you

You are not required to pay any charge for exercising your rights. If you make a request, I have one month to respond to you.

Please use the contact details supplied above if you wish to make a request.

Further details of your rights can be obtained by visiting the ICO website at <https://ico.org.uk>.

### **How to complain**

You can also complain to the ICO if you are unhappy with how I have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Helpline number: 0303 123 1113

This Privacy Notice is kept under review and was last updated on 13 August 2020. Should any discrepancies be found between different language versions of this notice, the English version will prevail.