

LINGOSAUR PRIVACY POLICY

1 GENERAL

Lingosaur is a translation service provided by Contatum Ltd ("Contatum" or "we"). We respect your privacy and endeavor to safeguard it. Please take a moment to read through the following description of our policy of collecting and processing personal data within Lingosaur website and service.

This Privacy Policy describes:

- What personal data we collect, how we collect it, and why;
- How we use such personal data and with whom we share it;
- How you can access and update such personal data;
- The choices you can make about how we collect, use, and share your personal data;
- How we protect your personal data.

By registering in to Lingosaur service or by using the service you accept the terms and conditions of this Privacy Policy. If you do not want us to collect, store, use or share your personal data in the ways described in this Privacy Policy, you may not use the Lingosaur service or website.

Additional information on the use of Lingosaur service is found in our Terms of Service.

In this Privacy Policy, "you" means our clients, potential clients and the freelance collaborate translators performing work for us. Any terms not defined in this Privacy Policy shall be given the meaning allocated to them in applicable data protection laws including the EU General Data Protection Regulation (EU 2016/679).

If you have any questions, comments or concerns regarding the Privacy Policy or our practices, please contact us by using the contact details below in section 2.

2 DATA CONTROLLER

Contatum Ltd. / Lingosaur
Hatanpään Valtatie 24
FI-33100 Tampere
FINLAND
E-Mail: info@lingosaur.com

3 WHERE DO WE COLLECT YOUR PERSONAL DATA?

3.1 We collect Personal Data from You

We collect Personal Data you provide when you create an account at Lingosaur website or use Lingosaur service. We also collect personal data when you contact us.

3.2 We collect Personal Data automatically when you use the Services

We collect and process personal data when you use Lingosaur service and website. Such data includes technical data and usage data.

4 WHAT DATA DO WE COLLECT?

4.1 User data

We collect the data you provide to us in your account profile, including

- your full name;
- email address;
- phone number;
- physical address and/or billing address;
- the time zone of your location;
- your order history including, for a limited time, the original documents and their translations.

In case you are a business customer, we also save

- the name of the company you represent; and
- BID/VAT information.

In the case you are our freelance collaborate translator, in addition to the personal contact information listed above, we also collect your

- username;
- birth date and year;
- fee payment details; and
- certain professional information in regard to translating work such as your job history with us and your language skills
- the date and time of your last login.

We may also collect information on how you heard about us.

In specific cases and only with your explicit consent, when you need us to perform translation service of a document containing special categories of personal data (including racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or a natural person's sex life or sexual orientation), we may also collect such data.

We also collect the following usage statistics at an aggregate level:

- your IP address;
- your browser;
- your operating system;
- the date and time of your visit.

4.2 Communications data

When you contact us or order our services via e-mail, we will collect and store the information you give (generally, your name, contact details as well as your message).

We may also store the further communications you have with us in order to provide support and improve our services.

5 FOR WHAT PURPOSES DO WE USE THE DATA WE COLLECT?

The purpose of the processing of personal data is to manage and maintain the relationships between Contatum, our clients and freelance collaborate translators.

We will use your personal data to the extent necessary for providing our services and to enable you to use Lingosaur service, that is, to the extent the processing of your personal data is necessary for the performance of a contract between you and us, or in order to take steps prior to entering into a contract. This includes providing you with a quote of the price of the translation work you want us to perform and providing you the translation service or recruiting freelance translators and engaging them in translation assignments.

Sometimes you may need to have a document such as a medical certificate or other document containing special categories of personal data translated, in which case we will also need to process this data for the performance of the Lingosaur service. This processing will be based on your explicit consent, and you have the right to withdraw your consent at any time (please note that such withdrawal does not affect the lawfulness of processing based on consent before its withdrawal). We will only retain this kind of data

for a limited time as specified below in section 9 of this Privacy Policy.

We also use your personal data for the purposes of our legitimate interests, namely to develop our processes to offer better service to our customers and freelance collaborate translators. Occasionally we may use the information for marketing and to contact you also to inform you about our services.

Aside from the obvious uses of your data to enable the functionality of the our service, we use the information we collect to

- improve our website and our system administration
- complete anonymous traffic analysis, via Google Analytics.

The information we collect in the registration process can also be used to prevent suspended users from registering under a different username based on our legitimate interest.

Please note that Contatum does not collect information related to credit cards, as they are directly managed on Paytrail Plc's secure payment processing server.

6 COOKIES

We might also send cookies to your browser to enable automatic logins when you visit in the future, as well as for content customization.

A cookie is a string of information or a small text file that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns.

Users who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Lingosaur website or service, with the drawback that certain features of the website may not function properly without the aid of cookies. The cookies will not enable Contatum to access and review data stored on a user's computer. Lingosaur website may contain third-party tracking tools from our service providers, examples of which include Google Analytics. Such third-party services are governed by separate privacy policies and this Privacy Policy does not apply to such third-party data collection.

7 HOW WE SHARE YOUR PERSONAL DATA TO THIRD PARTIES?

Contatum does not sell, trade, or otherwise disclose your personal data to third parties unless otherwise stated below.

We may share your personal data with authorized third parties who perform services for us for the purposes described in this Privacy Policy within the limits of the applicable legislation, such as our freelance collaborate translators, website hosting partners and other parties who assist us in operating our website, providing customer service, managing and analyzing personal data, conducting research and managing marketing campaigns. Because we take the responsibility to safeguard your personal data seriously, we do not allow those companies to use it for any purpose other than to perform those services, and we require them to protect your personal data in consistence with this Privacy Policy. Only the minimum necessary amount of your personal data is shared with third parties.

In addition, we may share your personal data based on a valid order from a court or other official body with sufficient authority, if required under any applicable law or regulation, or to investigate possible infringing use of Lingosaur service as well as to guarantee safety of Lingosaur service.

8 DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE OF THE EU AND THE EEA?

We use service providers and servers located in various countries around the world. Therefore we or our service providers transfer your personal data outside the country where you use Lingosaur services, including to countries outside the EU and EEA that do not have laws providing specific protection for personal data or that have different legal rules on data protection.

We ensure that a legal basis for such a transfer exists and that adequate protection for the personal data is provided as required by applicable law. We use standard contractual clauses approved by the European Commission and require that the receiving party uses appropriate technical and organizational information security measures.

9 HOW LONG DO WE STORE YOUR PERSONAL DATA?

We will not retain your personal data for longer than is necessary for the defined purpose of the processing of personal data or for legal requirements.

We may retain some information for some years after you have discontinued the use of Lingosaur service by closing your account, if this is necessary to meet our legal obligations or to exercise, defend or establish legal rights. For example, we retain your user data and communications data for two (2) years after you have closed your account in order to meet our legal obligations or to exercise, defend

or establish legal rights. However, we retain personal data related to payments and purchases for six (6) years in order to comply with all accounting obligations and the usernames of our freelance collaborate translators for four (6) years to prevent misuse such as suspended users from registering under a different username.

We retain the original documents and their translations provided by our clients for 6 months after the translation has been completed and delivered to the client to exercise, defend or establish our legal rights. This includes documents containing special categories of personal data.

10 HOW TO ACCESS, UPDATE AND MANAGE YOUR INFORMATION?

You have a right to access, update and manage your own personal data under the applicable data protection laws. If you wish to exercise any of the rights defined below in this section 10, please log in to the Lingsaur account. You may modify, correct and complement your customer information when logged in the service. If you do not have an account or want to exercise your rights not accessible through the account, please call or send an e-mail request thereof to us via the contact details defined in section 2.

We may ask you to provide further information in order to identify you. We will respond to your requests within 30 days.

10.1 Right to Access Your Data

You are entitled to obtain confirmation on whether or not we process personal data about you. You may also have information on our means of processing as well as a copy of the personal data undergoing processing. We may charge a reasonable fee based on our administrative costs if you request further copies.

10.2 Right to Rectify Your Data

You shall have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. You may have your incomplete data completed if you provide us with additional information or statement.

10.3 Right to Erasure

If you no longer want us to actively process your personal data, you can have us delete your personal data if:

- (i) your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed defined in section 5;

- (ii) if you withdraw your consent as defined in section 5;
- (iii) if you object to the processing and there are no overriding legitimate grounds for the processing;
- (iv) the personal data have been unlawfully processed; or
- (v) the personal data have to be erased for compliance with a legal obligation in applicable law.

10.4 Right to Restriction of Processing

You have the right to obtain from us restriction of processing where one of the following applies:

- (i) the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data;
- (ii) the processing is unlawful and the you oppose the erasure of the personal data and request the restriction of their use instead;
- (iii) we no longer need the personal data for the purposes of the processing, but you require that we store them for the establishment, exercise or defence of legal claims; or
- (iv) you have objected to processing pursuant and the verification whether our legitimate grounds override your rights and freedoms.

10.5 Right to Data Portability

You have the right to receive the personal data concerning you which you have provided to us (for example by creating an account) in a structured, commonly used and machine-readable format. You have the right to have the data transmitted to another controller if:

- (i) the processing is based on consent or on a contract; and
- (ii) the processing is carried out by automated means.

10.6 Right to Object Processing

You have the right to object, on grounds relating to your particular situation, at any time the processing of personal data concerning you, which is based on our legitimate interest.

We shall no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms.

You always have the right to object direct marketing and processing of personal data for such purposes.

11 THE RIGHT TO LODGE A COMPLAINT TO THE SUPERVISORY AUTHORITY

In case you suspect a breach of data protection legislation in processing of your personal data and the matter is not solved amicably between you and us by negotiating, you may contact the competent supervisory authority to lodge a complaint.

The supervisory authority you may lodge a complaint with is the authority of the Member State of your habitual residence, place of work or place of alleged infringement.

12 SECURITY OF YOUR INFORMATION

We implement technical and organizational security measures to help protect the security of your personal data both online and offline. We take steps to ensure that your personal data is treated securely and in accordance with this Privacy Policy and applicable laws. These measures vary based upon the sensitivity of your data.

As an example, only the maintenance personnel have access to the personal data file physically located in servers within Contatum facilities.

13 CHANGES TO THE PRIVACY POLICY

If we decide to make material changes to this Privacy Policy, we will tell you and other users by placing a notice on [www.lingosaur.com] or by sending you a notice to your e-mail address at latest 30 days before the planned changes.