

Privacy policy

1. Introduction.

Subtletexts is committed to protecting customer privacy and takes its responsibility for the security of customer information very seriously. We will always be clear and transparent about the information we collect and what we will do with that information.

2. Scope.

This Policy sets out the following:

What personal data We collect and process about You in connection with Your relationship with Us as a customer and as a result of Your use of Our website and online services;

- Where do We get the data from;
- What do We do with this data;
- How We store data;
- To whom We share / disclose this data and for what reason;
- How We deal with your data protection rights;
- And how We comply with data protection regulations.

All personal data is collected and processed in accordance with the UK and EU data protection laws.

3. Data Controller.

DATE SOUL LTD company number 13381427 holding it's legal address at 167-169 Great Portland Street, Fifth Floor, London, United Kingdom, W1W 5PF (referred to as "we", "us", "our" or "Subtletexts") in this policy primarily refers to Date Soul Ltd, including our associated trading name Subtletexts.com the main company, and, where appropriate, to other companies or other entities over which Subtletexts exercises management control if any.

Subtletexts is the "Data controller" of all personal information that is collected and used about Subtletexts Clients for the purposes of the General Data Protection Regulation (GDPR).

4. What Personal Data We Collect.

Personal data means any information about You that allows Us to identify You, such as your name, contact details, project reference number, payment details and information about your access to our website.

We may collect personal data from You when You organize a project with Us (directly or indirectly through our trusted third-party partners), use Our website or other websites available through Our website, or when You contact Us.

Specifically, We may collect information in the following categories of information:

1) Name, title, company name, business address, company registration numbers, email address, telephone number, credit / debit card or other payment details;

2) Information about Your purchases of products and services of Our trusted partners;

3) Information about Your use of our website;

4) Messages that You exchange with Us or send to Us through letters, emails, chats, calls and social networks.

We will only process any such data if You have given Your explicit consent, or is required, or if You have deliberately made it publicly available.

5. What do We use Your personal data for, why, and for how long?

Your data may be used for the following purposes:

1) Provision of the products and services you request: We use the information you provide to Us to provide the services you have requested in relation to your project, including requested project changes;

2) To contact You in the event of a change in the delivery date of the project; We send You messages about the services You have requested and any changes to those services. These messages are not for marketing purposes and cannot be unsubscribed;

3) Credit or other payment card verification / screening: We use Your payment information for accounting, billing and auditing purposes and to detect and / or prevent any fraudulent activity;

4) Administrative or legal purposes: We use Your data for statistical and marketing analysis, system testing, customer surveys, service and development, or to resolve disputes or claims. Please note that We may perform data profiling based on the data We receive from You for statistical and marketing analysis purposes. Any profiling activity will only be carried out with Your prior consent and every effort will be made to ensure the accuracy of all data on which it is based. By submitting any personal data, You expressly agree that We may use it for profiling in accordance with this Privacy policy;

5) Communication with Customer Service: We use Your data to manage Our relationship with You as Our customer, as well as to improve Our services and improve Your interaction with Us;

6) Provision of personalized services: We use Your data to provide information that We believe is of interest to You, before, during and after Your project with Us, and to personalize the services We offer You.

7) Marketing: From time to time, We will contact You with price offerings and additional products by email. You will have a choice whether to agree or refuse to receive such messages, indicating Your choice at the stage of ordering the project. You will also be given the option in every email that We send You to indicate that You no longer wish to receive Our direct marketing materials.

We will only process Your personal data if we have a legal basis to do so. The legal basis will depend on the reasons We have collected and for which We need to use Your personal data.

We may also process your personal data for one or more of the following:

- To comply with a legal obligation;
- You have consented to us using your personal data (e.g. for marketing related uses);
- To protect your vital interests or those of another person;
- It is in our legitimate interests in operating as a translation/interpretation and copyrighting agency.

We will not store Your data for longer than is necessary to achieve the purpose for which it is processed. In order to determine the appropriate storage period, we take into account the amount, nature and confidentiality of personal data, the purposes for which We process them, and whether We can achieve these goals in other ways.

We must also consider the periods during which We may need to retain personal data in order to comply with Our legal obligations or to deal with complaints, inquiries and to defend Our legal rights in the event of a claim.

When We no longer need Your personal data, We will securely delete or destroy it. We will also consider if and how We can minimise over time the personal data that We use, and if We can anonymise Your personal data so that it can no longer be associated with You or identify You, in which case We may use that information without further notice to You.

6. Security of Your personal data.

We follow strict security procedures when storing and disclosing Your personal data. The data You provide is protected by SSL (Secure Socket Layer) technology. SSL is the industry standard method for encrypting personal information and data so that it can be transmitted securely over the Internet.

We may disclose your information to trusted third parties for the purposes set out in this Privacy Policy. We require all third parties to have appropriate technical and operational security measures to protect your personal data in accordance with UK and EU data protection laws.

7. International data transfer.

Subtletexts provides services in multiple jurisdictions, some of which are not located in the European Economic Area (EEA). While countries outside the EEA do not always have strong data protection laws, We require all services providers to process Your information in a secure manner and in accordance with UK and EU law on data protection. We utilise standard means under EU law to legitimise data transfers outside the EEA.

8. Sharing Your personal data.

We may share Your personal data with the following third parties for the purpose described in this Privacy policy:

- 1) Government agencies, law enforcement agencies and regulatory bodies in accordance with the requirements of the law;
- 2) Partner companies / freelancers required to provide the services You requested;
- 3) Trusted freelancers We use to run Our business, such as call centres assisting Our clients, cloud services and email marketing service providers helping Our marketing team conduct customer surveys and conduct targeted marketing campaigns;
- 4) Credit and debit card companies that facilitate Your payments to Us, and anti-fraud screening, which may need information about Your method of payment and project booking to process payment or ensure the security of Your payment transaction;
- 5) Legal and other professional consultants, courts and law enforcement agencies in all countries where We operate to ensure that We respect our legal rights in relation to Our contract with You;

6) Social Media: You can access third party social media services through Our Website before going to Our Website. When You register with Your social media service account, We will receive personal information that You choose to share with Us through those social media services, in accordance with their privacy settings, in order to improve and personalize Your use of Our website. We may also use social media plugins on Our Website. As a result, Your information will be shared with Your social media provider and possibly presented on Your social media profile for transmission to other members of Your network. Please see the privacy policies of these third party social media providers to learn more about these methods.

9. Cookies.

This site uses cookies so that We can improve Our services for You and provide certain features that may be useful to You. This may include media and advertising partner cookies that are placed on Your computer when You visit Our website. Please visit Our partner websites for information about their privacy and cookie policy.

Cookies are small text files that are transferred to Your computer's hard drive through Your web browser to enable Us to recognise Your browser and help Us to track visitors to Our site; thus, enabling Us to understand better the products and services that will be most suitable to You. A cookie contains Your contact information and information to allow Us to identify Your computer when You travel around Our site for the purpose of helping You accomplish Your project booking. Most web browsers automatically accept cookies, but, if You wish, You can change these browser settings by accepting, rejecting and deleting cookies. The "help" portion of the toolbar on most browsers will tell You how to prevent Your browser from accepting new cookies, how to have the browser notify You when You receive a new cookie, or how to disable cookies altogether. If You choose to change these settings, You may find that certain functions and features will not work as intended. The cookies we use do not detect any information stored on your computers.

For more information about cookies and how to stop cookies being installed visit the following website: www.allaboutcookies.org.

We use tracking software to track customer traffic patterns and site usage to help Us design and layout websites. This software does not allow Us to collect personal information from customers.

10. Data protection officer.

We have appointed a Data Protection Officer ("DPO") to oversee this policy. You have the right to lodge a complaint with a supervisory authority at any time. The Information Commissioner is the leading data protection supervisor for Subtletexts as the UK data controller.

11. Your data protection rights.

Under certain circumstances, by law, you have the right to:

- 1) Request information about whether We store personal information about You, and if so, what kind of information it is and why We store / use it.
- 2) Request access to Your personal information (commonly known as a "data access request"). This allows You to receive a copy of the personal information that We hold about You and verify that We are processing it lawfully.
- 3) Request correction of the personal information We hold about You. This allows You to correct any incomplete or inaccurate information We hold about You.

4) Request the deletion of Your personal information. This allows you to ask Us to delete or remove personal information if We have no compelling reason to continue processing it. You also have the right to ask Us to delete or remove Your personal information if You have exercised Your right to object to processing (see below).

5) To object to the processing of Your personal information when We rely on a legitimate interest (or the interests of a third party) and there is something in Your particular situation that makes You object to processing on this basis. You also have the right to object when we process Your personal information for direct marketing purposes.

6) Object to automated decision making, including profiling, which should not be the subject of any automated decision making by Us using Your personal information or Your profile.

7) Request the restriction of the processing of Your personal information. This allows You to ask Us to suspend the processing of your personal information, for example, if You want Us to determine its accuracy or the reason for its processing.

8) Request the transfer of Your personal information in an electronic and structured form to You or another party (commonly known as the “data portability” right). This allows You to receive Your data from Us in electronic format and to be able to transfer Your data to another party in electronic format.

9) Withdraw consent. In limited cases where you could give your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent to that specific processing at any time. Once We receive notification that you have withdrawn your consent, We will no longer process your information for the purposes for which you originally agreed, unless We have another legal basis to do so in law.

If you want to exercise any of these rights, contact our DPO by email support@subtletexts.com.

You will not have to pay to access Your personal information (or to exercise any other rights). However, We may charge a reasonable fee if Your request for access is manifestly unfounded or excessive. Alternatively, We may refuse to comply with the request in such circumstances.

We may need to request specific information from You to help Us verify Your identity and to ensure Your right to access information (or to exercise any of Your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to anyone who is not entitled to receive it.

12. Amendments to Privacy policy.

Our Privacy policy may change from time to time and any changes to this statement will be communicated to You by email or notice on Our Website.

Last updated: 19 June 2021.