Privacy Policy (Website)

This notice explains how we use and process Personal Data that we collect from visitors using our website.

Who We Are

Isarey Language Services Ltd.

20-22 Wenlock Road; LONDON N1 7GU; United Kingdom

Registered in England And Wales | Company No. 07079838

Registered with the UK Information Commissioner's Office: Reference number: ZA566868

Email (general enquiries): info@isarey.com

Email (personal data enquiries): personaldata@isarey.com

Definitions used in this policy

- **Collected Data**

  Personal Data which we have purposefully collected from you, automatically or manually following the submission of forms provided on our website or as a result of communications which we have solicited from you.

- **Data Breach**

  A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

- **Data Controller**

  The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

- **Data Protection Laws**

  Data protection or privacy laws applicable to the processing of Personal Data within the European Economic Area and the United Kingdom, in particular Regulation (EU) 2016/679 of the European Parliament and of The Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation) and the United Kingdom Data Protection Act 2018, and including, to the extent applicable and where not in conflict with the applicable laws and regulations of the European Economic Area and the United Kingdom, the data protection or privacy laws of any other country;

- **Data Subject**

  Natural person who is identified by or identifiable from Personal Data

- **European Economic Area**

  The Member States of European Union, as well as Norway, Iceland and Liechtenstein, and including, for the purpose of this policy, the United Kingdom.

- **Personal Data**

  Any information relating to an identified or identifiable natural person.

- **Processing**

  Any operation or set of operations which is performed on Personal Data or on sets of Personal Data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

- **Third Party**

  A natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

Scope of this policy

The provisions of this policy apply to the Personal Data of all natural persons, regardless of their nationality or place of residence.

This policy sets out how we conduct the Processing of Personal Data collected in the context of a general visit to our website (https://www.isarey-document-attestation.es) and our general policies on data processing.

We provide separate policies for the specific Processing of Personal Data which is performed upon the submission of customer inquiries using the different forms provided on our website:

Privacy Policy (Customer Inquiries)

Objective of this Policy

We are committed to the protection of privacy and of all Personal Data entrusted to us for Processing. This protection is a fundamental right essential to individual well-being. As such, the objective of our policy is to ensure that all Personal Data which we process is:

- Processed fairly, lawfully and in a transparent manner;
- Collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- Adequate, relevant and limited to what is necessary;
- Accurate and, where necessary, kept up to date;
- Not kept for longer than necessary; and
- Processed securely, maintaining integrity and confidentiality.

Data Protection Laws

The principal law governing this policy is UK Data Protection Act 2018 (UK DPA):

- where there is any omission, ambiguity or lack of clarity in this policy, the provisions of the UK DPA shall apply;
- except where otherwise and specifically defined for the purposes of this policy, all terms and concepts used in this policy shall have the meaning given to them under the UK DPA;

Validity of this Policy

Where users choose to submit additional personal data using the forms or contact details available on our website, the processing of this data will be governed by the provisions of the specific policy relating to the submission, as below. The provisions of the specific policy shall prevail over this general policy as applicable.

- Privacy Policy (Customer Inquiries)

This policy may be upated without notice And remains valid until a New version Is posted on our website.

What Personal Data we collect

When you visit our website, we collect the following personal data

- IP address
- Information about the device you are using to access this website (including, User Agent, browser version, type of device, screen size)
- Information about your use of our website (including, the date and time of your visit, the pages your visit, which links you follow, the website you visited before you visited, data about the way you interact with our website).

How we use Personal Data

- **Statistics on the use of our Website**
  Lawful basis for processing: Data Subject consent
  - The User Agent and IP address of the device used to visit our website is processed in order to obtain information on your location (Region) and about your device. This data is not retained, but used, together with the data collected on your use of the website, for the purpose of producing aggregated statistics about the use of our website without any permanent link to data that would allow identification of any particular natural person. This processing takes place only where the user has given consent to the use of cookies and similar technologies "to gather anonymous statistics on how our website is used".
    See: Cookie Policy

- **Error reporting and analysis**
  Lawful basis for processing: Data Subject consent
  - The User Agent and other data collected on your use of the website is processed for the purpose of detecting, analysing and correcting errors in the functioning of our website. It will be processed without any permanent link to data that would allow identification of any particular natural person. This processing takes place only where the user has given consent to the use of cookies and similar technologies "to report any errors occurring on our website" or gives their consent to report a specific error.
    See: Cookie Policy

- **Website security**
  Lawful basis for processing: legitimate interests
  - The User Agent And IP address of the device used to visit our website may be processed where we have detected user interactions which indicate a breach of the terms and conditions governing use of this website, including but not limited to interactions that fit known patterns of attempted hacking or misuse.

Links to Other Websites

Our website contains various links to information and articles hosted by third-party websites. We accept no responsibility or liability for the content of these sites or for the privacy or security policies operated by these websites.

Unsolicited submissions of personal data

Personal Data which is communicated to us upon the initiative of the submitter for any purpose other than obtaining commercial information about our services will be considered unsolicited data (in particular, Personal Data included in unsolicited CVs or other unsolicited commercial offers). Such data is not covered by this policy,

Where we receive unsolicited data, we will either, within 60 days of receipt:

- Respond, providing the privacy policy which will apply to our continued processing of this personal data; or

- Without any notification, delete the personal data in question without any further processing.

How we share Personal Data

- **IP address**
  We may share your IP address (but no other Personal Data) with providers of automated IP geo-location services for the purpose of obtaining data about your location and fraud prevention.

- **Device parameters**
  We may share your device's User Agent (but no other Personal Data) with providers of automated services, obtaining information about your device, such as screen size and browser version, for the purpose of compiling aggregated statistics about the use of our site, error management and providing website functionality and display that is tailored to your device's specifications.

Otherwise, we will not share any Collected Data with any third party, except where:

- We are required to do so by law;
- We have reason to beleive that your use of our website is unlawful or malicious, and where diclosure is necessary to safeguard our legitimate interest

International transfers

Where necessary for the purpose of data processing and where also compatible with the lawful basis of processing, personal data may be processed by appointed Data Processors in countries outside of the European Economic Area and may also be transferred to international organisations (including embassies or consulates representing non-EEA countries, even where within EEA territory) subject to at least one of the following safeguards:

- the country where data processing takes place Is a country which the European Commission has decided ensures an adequate level of protection;
- the transfer is subject to standard data protection clauses adopted Or approved by the European Commission;
- the transfer is subject to an approved code of conduct together with binding And enforceable commitments of the processor to apply the appropriate safeguards, including as regards data subjects' rights.
- If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place.

In other cases, on an exceptional basis, we may transfer personal data to a non-EEA country or International Organisation where it is not feasible to apply one of the above safeguards, provided that at least one of the following conditions is met:

- the data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers;
- the transfer is necessary for the implementation of pre-contractual measures taken at the request of Data Subject;
- the transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject's request;
- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person; or
- the transfer is necessary for Isarey to establish, exercise or defend legal claims.

How long we keep Personal Data

Collected Data under this Privacy Policy is automatically anonymised when your session ends (i.e. when you leave our website or close your bowser), so that any data that could be used to identify you is deleted, except where we have detected indication that your visit is in breach of the terms and conditions governing use of our website, a threat to the security and integrity of our website and other users, in which case we may retain as the Collected Data for as long as considered necessary to protect against future non-compliant visits.

How we store Personal Data

Except where otherwise stated, our Personal Data will be stored and processed by us in the European Economic Area. All Personal Data is processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. These measures include, as appropriate, the pseudonymisation and encryption of personal data, and other measures to ensure the ongoing confidentiality, integrity, availability and resilience of our processing systems and services.

Your rights

Where you are the Data Subject (the personal data relates to you), you have the following rights:

- **You have a right to be informed about the collection and use of your personal data**
  Information on the collection and use of your personal data is provided in this privacy policy, which is available on our website, and can also be obtained by contacting us.

- **You have a right to access your personal data**
  You have a right to obtain confirmation that we are processing your personal data and to receive a copy of your personal data.

  You also have right to obtain confirmation and information as regards:

  - the purposes of our processing;
  - the categories of personal data concerned;
  - the recipients or categories of recipient that we have disclosed your personal data to;
  - the periods for which your personal data will be retained and our policies on retention and deletion;

- how you may request rectification, erasure or restriction of your personal data or to object to its processing;
- the safeguards provided if we transfer your personal data to a country outside the European Economic Area or to an International Organisation.

- **You have a right to rectify your personal data**
  Where your personal data is inaccurate or incomplete, you have the right to have this rectified.

- **You have a right to erase your personal data**
  You have the right to have personal data erased. This applies where its processing and retention is no longer necessary for the purpose for which it was originally collected or processed, or where it is being processed based on your consent and you wish to withdraw this consent.

  Your right of erasure does not apply where your data was obtained lawfully and where:

  - its erasure would prevent us from complying with a legal obligation; or
  - its erasure would prevent us from the establishment, exercise or defence of a legal claim.

- **You have a right to restrict the processing of your personal data**
  You have a right to restrict the processing of your personal data in certain circumstances under the law.

- **You have a right to data portability**
  You have a right, in certain circumstances under the law, to obtain and reuse personal data which you have provided to us.

- **You have a right to object**
  You have a right to object to the processing of your personal data in certain circumstances under the law. This right is applicable only where we are processing data based on your consent.

- **You have a right to be informed in the event of a Data Breach**
  You have a right to be informed, directly and without undue delay, in the event of a Data Breach affecting your personal data where this breach is likely to result in a high risk to your individual rights and freedoms.

How to exercise your rights

All requests and inquiries in relation to the processing of your data and your rights under this policy may be addressed to:

By Post:

Data Protection Officer
Isarey Language Services Ltd.
20-22 Wenlock Road; LONDON N1 7GU; United Kingdom

>**By Email:**

personaldata@isarey.com

We will respond to requests within 30 days, either fully complying or setting out the lawful reasons why we are not complying or only partially complying.

Depending on the type of request and the data involved, we may require verification of your identity as Data Subject.

Inquiries and Complaints

If you have any questions, concerns, comments or complaints about our privacy policy or our processing of Personal Data, please contact us by email at personaldata@isarey.com.

If you remain unsatisfied with our response to your complaint or inquiry, and wish to take the matter further, you may contact: Information Commissioner's Office.

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