

Data protection policy

for

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Contents

1. Introduction	2
2. Legal basis for data collection	2
3. Purpose of data collection and processing.....	3
3.1 Personal data about customers.....	3
3.2 Personal data about a third party.....	3
4. Data collected	3
4.1 Personal data about customers.....	3
4.2 Personal data about a third party.....	4
5. Data storage and protection	4
5.1 Protection of data	5
6. Use of data	5
6.1 Use of personal data about customers	5
6.2 Use of personal data about a third party	6
7. Data transfer.....	6
8. Data erasure	7
8.1 If you are a potential customer.....	7
8.2 If you are a current customer or a third party.....	7
9. Your rights.....	8
10. Changes to this data protection policy.....	8
11. Complaints.....	9

1. Introduction

This data protection policy will inform you of the following:

- how, when, and why I collect personal data
- what personal data I collect
- how, and for how long, I keep personal data
- your rights and options for complaining about my handling of personal data

2. Legal basis for data collection

The legal basis for my collection of personal data is the legitimate interest of my company in carrying out assignments for its customers. Without the personal data I collect, it would not be possible for me to complete such assignments.

If you are a current or potential customer and contact me in person or via phone, email, or letter, I take this as your consent to my collection of regular personal data about you as described in section 4.1.

If you are a customer and transfer personal data about a third party to me in connection with a concrete assignment, or if you give me permission to contact a third party on your behalf, I take this as your consent to my collection and processing of personal data about the third party in question.

If I contact you as a customer or third party, for example in order to interview you, this contact occurs in connection with a concrete assignment from one of my customers. If you accept communication between us after this initial contact, I take this as your consent to my use of personal data about you as agreed in connection with the assignment in question.

You may at any time withdraw any consent and request erasure or transfer of your personal data as described in section 9.

3. Purpose of data collection and processing

3.1 Personal data about customers

If you are a current or potential customer, I only collect and process personal data about you in order to communicate and cooperate with you and/or the company that you represent on concrete assignments.

3.2 Personal data about a third party

I only collect and process personal data about a third party with the purpose of carrying out one or more concrete assignments for one of my customers.

All use of personal data in this respect occurs as a result of an agreement with one of my customers and/or the third party in question. This will typically be in connection with a writing assignment where I need to interview a third party, or where personal data about a third party occurs in the source material for the text to be written. It can also happen in connection with translation assignments where the text to be translated and/or the translation memory used includes personal data about a third party.

I may also use information about an assignment, including personal data about a third party, for a case study for the purpose of promoting my company. I will, however, only do so following agreement with my customer.

4. Data collected

4.1 Personal data about customers

I collect regular personal data about customers. This may include, and usually only includes, the following:

- name
- position
- department
- company (including its address and VAT number)
- phone number
- email address

The above applies to both current and potential customers.

I will *not* collect sensitive personal data about you such as religious beliefs, sexual orientation, or trade union affiliations.

I will *not* collect personal data using cookies or other automated tools.

4.2 Personal data about a third party

As I work on one or more concrete assignments, a customer may transfer personal data about a third party to me or request that I contact a third party on behalf of the customer. Examples:

- A customer sends me texts for use as reference material when writing, translating, or proofreading, and the texts in question include personal data.
- A customer sends me texts for editing or translation, and the texts in question include personal data.
- A customer sends me translation memories or gives me access to such translation memories online, and the translation memories include personal data.
- I carry out video or sound recordings or transcribe interviews and thereby come to possess personal data about a third party.

This personal data may include regular as well as sensitive personal data. You accept that I process this data for the purposes of carrying out one or more concrete tasks as described in section 6.

5. Data storage and protection

I store personal data as follows:

- in computer programmes, including common office programmes and translation memories
- in other files on the project drive of my PC, including various text files pertaining to concrete assignments, invoices, and similar
- on my phone. Contact information on my phone is continuously synchronised with the online service that I use. Personal data may therefore be transferred for processing in a third country (in other words, a country outside the EU/EEA); see section 7
- online on the website of the transcription service I use to process recorded interviews. The data is transcribed by an AI-driven engine on a server located in the EU

- physically in the form of contact information on invoices, letters, and other printed documents stored in printed form
- as a part of case studies on my website www.rasmusgissel.dk, if you have given me permission for this

I back up personal data as follows:

- locally, storing the personal data on a USB memory stick in a safe location on the premises of the company
- externally, storing the personal data with my backup provider who keeps the backup data on servers within the EU/EEA.

5.1 Protection of data

The data I keep is protected as follows:

- My computer is protected from unauthorised access using a password, firewall, and antivirus software.
- My phone is password protected.
- Contact information synchronised from my phone is protected by the online service that I use.
- Sound recordings that I transfer to an AI/driven service are uploaded fully encrypted, is not used to train AI models, and is deleted upon completion of the transcription.
- Local backup data is hidden in a safe place on company premises.
- External backup data is protected by the backup provider that I use.

6. Use of data

I use the personal data that I collect for various purposes as outlined below.

I always treat all personal data as confidential and take steps to ensure that my storage and use of such data complies with this policy, any separate agreements with you and/or the company you represent, Danish law, and the EU's General Data Protection Regulation (GDPR).

6.1 Use of personal data about customers

I use the personal data I collect about customers for business communication with those customers and/or the company they represent, or in connection with carrying out concrete assignments. This communication may revolve around concrete assignments but may also serve other purposes. Examples:

- inquiries and planning in connection with an assignment
- research, interviews, and query resolution
- (customers only) direct marketing unless you have objected to this; see section 9
- invoicing after completing an assignment

Communication may take place using any channel made possible by the personal data collected.

In addition, I may use the personal data collected to create sales and turnover statistics for internal company use.

If the customer agrees, I may also use the personal data collected in case studies in order to promote my company.

6.2 Use of personal data about a third party

I will only use personal data about a third party that I have collected, or which a customer has transferred to me or asked me to collect, for carrying out one or more concrete assignments.

I may also use regular personal data about a third party in a case study for promoting my company. Any such use is subject to the consent of one of my customers. I assume that this customer has acquired the consent of the third party in question for this use of personal data about that third party.

7. Data transfer

I will *not* transfer personal data to a third party unless you have expressly consented to this. However, there are a couple of significant exceptions:

- I synchronise contact information from my phone with an online service. Personal data is thus stored with a third party who may store it in a third country (outside the EU/EEA).
- I continuously back up live projects and contact information on my PC. Personal data is thus stored with a third party who stores it on a server within the EU/EEA.
- I use an AI-driven online service to transcribe interviews. For more information, see section 5 and 5.1.
- If a customer consents to my use of a concrete assignment in a case study on my website, personal data about that customer and possibly a third party may be published in connection with this. I reserve the right to link to such a case

study from various social media in order to increase awareness of the case study and promote my company. When a customer consents to my use of a concrete assignment in a case study, I assume that any third parties involved have consented to this.

8. Data erasure

I will erase personal data when I no longer have a legitimate need to keep it. When I will do so depends on whether you are a current or potential customer as defined in section 3.1 or a third party as defined in section 3.2.

8.1 If you are a potential customer

If you contact me in order to discuss an assignment, but I do not carry out the assignment, and you are not already a customer of my company (in other words, I have not previously carried out any assignments for you), I will erase personal data about you no later than the end of the month in which you contacted me.

8.2 If you are a current customer or a third party

If you are a current customer or a third party, I will erase all personal data about you no later than 5 years after the last contact between us over the phone, email, or other channels. Your personal data will be deleted from the following places:

- my email contact book and other software on my PC
- my project drive where I store active projects
- my backup (local and external) as described in section 5
- my phone
- any case studies on my website in which you appear

I will burn and dispose of old invoices et cetera 5 years after the end of the accounting year in question.

I may contact you in order to request permission for keeping a case study in which you appear online for another 5-year period after my last contact with you. If you decline, I will immediately remove the case study from my website. Note that you may at any time withdraw your consent to my use of an assignment in a case study as described in section 9.

9. Your rights

You always have the following rights as set forth in the GDPR:

- You have the right to be informed that I process personal data; in other words, that I store, arrange, and use this data.
- You have the right to be informed which personal data I keep about you.
- If the personal data I have collected about you is erroneous, you have the right to have it rectified.
- You have the right to have personal data I have collected about you erased (also known as the right to be forgotten). Please note, however, that this will make further cooperation between us impossible, as I cannot contact you legally.
- You have the right to obtain a copy of the personal data I have collected about you in a structured, commonly used, and machine-readable format. You can thus choose to transfer the data to another data controller. However, this will make further cooperation between us impossible as described above.
- You have the right to object to my use of personal data about you in direct marketing. You also have the right to object to my use of your personal data for automated individual decision-making, including profiling.

If you want to exercise one or more of your rights, please contact me. I will do my best to accommodate your request unless the provisions of Danish law or the GDPR dictate otherwise.

Contact information:

Rasmus Gissel
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8800 Viborg
Denmark
Tel. +45 30 26 58 24
rg@rasmusgissel.dk

10. Changes to this data protection policy

I reserve the right to change this data protection policy at any time and without prior notice if legislation or the requirements of my company change.

If I do introduce a significant change, you will be notified via email and may then decide if you want to exercise any of your rights, including the right to be forgotten, as described in section 9.

11. Complaints

If you wish to complain, please contact me using the contact information provided in section 9.

If you are dissatisfied with my processing of personal data or a complaint lodged by you, you may also contact:

The Danish Data Protection Agency
Carl Jacobsens Vej 35
2500 Valby
Denmark
Tel. +45 33 19 32 00
dt@datatilsynet.dk