

*Kennedy Paver Limited*  
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## PRIVACY NOTICE Version 1, May 2018

This Privacy Notice sets out how Kennedy Paver Limited collects and uses personal information. This Privacy Notice was last updated on 24th May 2018.

### **1. Responsibility for Processing Personal Data**

Kennedy Paver Limited is the Data Controller/Processor. This is the legal entity responsible for how personal data is collected, stored and processed.

Kennedy Paver, Director of Kennedy Paver Limited, is the individual with responsibility for controlling and processing data. The contact details for Kennedy Paver are given above.

### **2. Purposes of processing**

Personal data is processed as part of translation and other language services activities carried out on behalf of customers. Personal data may be contained, for example, in source texts for translation or proofreading, translation memories, reference materials, and translated, proofread, edited or copyrighted texts, received from or sent to customers via secure electronic means.

Personal data on customers is also held and processed for the purpose of normal invoicing, banking and accounting activities, and as part of normal electronic and other communications with customers.

Personal data on suppliers and service providers (for example accountants, IT consultants, etc.) is also held, for the purpose of obtaining supplies and services to support the business activities of the company.

### **3. Lawful bases for processing**

The lawful bases for processing personal data are as follows:

- Contracts established between Kennedy Paver Limited and its customers, for the provision of translation, interpreting, training, teaching, copywriting, proofreading, consultancy or other services.
- Legal obligations to keep records for tax and accountancy purposes.
- Legitimate interest in processing personal data for commercial purposes.

#### **4. Data retention period**

Data retention periods are as follows:

- Data in tax and accountancy records will be retained for the period required by law.
- Data on contracts as well as commercial records and communications will be retained for as long as required to enable the effective operation of the business.
- Personal data contained in source texts, translations, reference materials and other related documents will be deleted as soon as is practicable, and in any case within six months. Documents may be retained for as long as required for the operation of the business once personal data has been removed.
- Data not required to be retained for the above purposes will be deleted as soon as is practicable, and in any case within six months.

#### **5. Data sharing**

Data will be shared only for the following purposes:

- The supply of translated, proofread, edited and copywritten texts in accordance with contracts with customers. The data contained in such texts is provided by the customer, processed as part of the translation/proofreading/copywriting/editing process, and returned to the customer without being disclosed to any third party, except where expressly agreed with or required by the customer.
- The provision of financial and accounts records to accountants for the purpose of producing legally required company accounts.

All data will handled confidentially, and will not be shared other than for the purposes stated above.

#### **6. Personal Data Rights**

All rights accorded to individuals under data protection legislation shall apply in respect of personal data held by Kennedy Paver Limited.

To find out more about these rights, visit the relevant page on the Information Commissioner's Office (ICO) website:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

All individuals about whom personal data is held have a right to lodge a complaint with the Information Commissioner's Office (ICO) about the way their personal data has been handled.