

## **PRIVACY POLICY**

### **SFERA Translation Services Privacy Policy for Customers and Clients**

The exchange of personal information is inherent in every touchpoint or interaction we have with consumers; thus, in conducting every aspect of our business, we may collect personal information.

### **Sources from which SFERA Translation Services receives personal information**

SFERA Translation Services receives personal information from the following categories of sources:

- You, the consumer.
- Data Analytics Providers.
- CRM Platforms.
- Email Marketing Platforms.
- Payment Platforms.
- Social Networks.
- Service Providers.

### **Purposes for which SFERA Translation Services collects personal information**

SFERA Translation Services primarily collects personal information as necessary to provide our customers with translation and copyediting services. However, we also collect personal information for the following reasons for the purposes of auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards; detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity; debugging to identify and repair errors that impair existing intended functionality; short-term, transient use, provided the personal information that is not disclosed to another third party and is not used to build a profile about a consumer or otherwise alter an individual consumer's experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction; performing services on our behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business; undertaking internal research for technological development and demonstration; and undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or managed

by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business.

### **Limited use**

We will only use your personal information for the purposes we collected it unless we reasonably determine we need to use it for another reason and that reason is compatible with the original purpose.

PLEASE NOTE THAT WE MAY PROCESS YOUR PERSONAL INFORMATION WITHOUT YOUR KNOWLEDGE OR CONSENT, IN COMPLIANCE WITH THE ABOVE RULES, WHERE THIS IS REQUIRED OR PERMITTED BY LAW.

### **How SFERA Translation Services share personal information**

We share your personal information among our service providers and third parties to provide you with the best services, as described below. We do not share the contents of documents submitted for translation or personal information contained therein except as requested by you, as necessary to perform our services, or as we understand to be required by law.

Advertising Networks. We share personal information with third parties who help us market to you through advertising online.

Customer Relationship Management Platforms. We share personal information with companies that provide customer relationship management platforms (“CRM Platforms”) to track our relationships and interactions with customers and other consumers.

Email Marketing Platforms. We share personal information with companies that provide marketing services and communications platforms (“Email Marketing Platform”) that we use to contact our customers and other consumers.

Payment Platforms. We share personal information with companies that help us receive payments for orders for our services (“Payment Platforms”).

Service Providers. We may, from time to time, use business partners, suppliers, and subcontractors (“Service Providers”) to assist us with the provision of services to you (for example, without limitation, website hosting, app design, maintenance services, database management, web analytics, app analytics, billing, payment processing, fraud protection, credit risk reduction, marketing, or improvement of services). These Service Providers have access to your personal information only to perform the respective tasks assigned to them on our behalf and are obligated not to disclose or use it for any other purpose.

Third Parties. In addition to third parties in the previous categories, we may share personal information with the following types of third parties: Data Analytics Providers, government entities, internet service providers, operating systems and platforms, and social networks. For this Statement, “third party” or “third parties” includes parties that may sell, retain, use, or disclose personal information for specific purposes beyond the limited scope of our contract or direct business relationship with such entities.

Compliance with Laws. We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We may disclose your personal information to government or law enforcement officials or private parties in response to lawful requests when we believe disclosure or sharing is necessary to comply with any legal obligation, enforce or apply our terms and conditions, respond to claims and legal process, protect our Services, members, dealers, our rights and the safety of the public or any person, or prevent or stop any illegal, unethical or legally actionable activity (including for fraud prevention).

**Modifications to our privacy policy**

We reserve the right to change our privacy policies at any time, except as may be prohibited by law. We will post revisions online. Use of our services after posted changes means that you consent to the privacy policies as changed.

**Contact Information**

If you have any queries or complaints, please contact us via e-mail at

SFERA Translation Services  
info@sfera-translationservices.com