

## DESCRIPTION OF FILE

Description of file and privacy policy in accordance with Section 10 of the Personal Data Act (523/1999) and the EU's General Data Protection Regulation (GDPR)

### Controller

Name: Polaris Kielipalvelut Oy  
(Polaris Language Services Ltd.)  
Address: Aarnintie 5 B 13, 95420 Tornio, Finland

### Contact person in matters relating to the file

Cyrus Jebraeil, [polaris@polariskielipalvelut.fi](mailto:polaris@polariskielipalvelut.fi)

### Name of register

Customer and contractor file

### Updated

4.4.2023

### Purpose of processing of personal data

The legal basis under the EU's General Data Protection Regulation for the processing of personal data is the legitimate interest of the controller (customer relationship/agency relationship).

With regard to customers, the purpose of the processing of personal data is to coordinate and execute orders, manage customer relationships, statistics, opinion surveys (such as customer satisfaction surveys etc.), sales, marketing, invoicing and development of services.

With regard to contractors, the purpose of the processing of personal data is to coordinate and execute orders, manage agency relationships, statistics, opinion surveys, payment of fees and development of services.

### Data content of file on customers and their staff

User's name, email, telephone number, invoicing address, organisation, detailed order data given by user and all other data entered into the system by the user him/herself.

### Data content of file on contractors

Contact details of persons and staff carrying out assignments, payment details, language details, dialect, education details, details of hourly rate for interpretation and/or rate per page for translations, details of work experience, customer feedback on contractor, gender information and all other data entered into the system by the contractor him/herself.

Polaris Language Services Ltd uses gender information in coordinating orders where the customer has specifically requested a male or female interpreter. It is not essential to disclose gender information, and on request the data can be removed or altered in the ERP system.

Data on contractors' education and work experience is collected so as to be able to coordinate orders to a contractor who meets the customer's requirements. Education and work experience data can be added, altered or removed in the ERP system. Contractors' data is not disclosed without their express permission.

### Regular sources of data

Data sources include customer relationships and agency relationships.

### Regular disclosures of data

Data disclosed by the customer and pertaining to the order is disclosed to the contractor (interpreter/translator/proofreader). The name and telephone number of the interpreter receiving the assignment are disclosed to the customer. With regard to authorised translations, the translator's name is disclosed to the customer. Otherwise data is not regularly disclosed. The data visible in the contractor's interface of the ERP system is limited to essential data related to orders/assignments. Personal data relating to the persons themselves is visible to them.

## **Confidentiality**

All contractors and staff of Polaris Language Services Ltd and the ERP system's administrator are bound by a written non-disclosure agreement. All material is processed confidentially.

## **Transfer of data outside the EU or EEA**

The server of the ERP system of Polaris Language Services Ltd is located in the EU/EEA. All data in the system is transmitted via an encrypted secure connection.

Polaris Language Services Ltd also uses a cloud service to store personal data, the server for which is outside the EU/EEA and which meets the requirements of the GDPR (Privacy Shield).

## **Data storage**

Essential data is stored for a maximum of 10 years following termination of a customer or contractor relationship.

Customers' contact details may however be kept for longer for marketing purposes provided that the person has not prohibited direct marketing.

## **File protection principles**

Care is exercised in file processing and data processed using information systems is duly protected.

Due care is paid to the physical and digital data security of hardware.

Stored data and operating system access rights are treated confidentially and only by those employees with the relevant function.

## **A. Manual material**

Agreements, annexes and tendering documents.

Translation and proofreading material and interpretation preparation material are destroyed within a relevant period.

## **B. Computer-processed data**

Polaris Language Services Ltd uses a browser-based ERP system in accordance with the GDPR, where all data is transmitted via an encrypted SSL connection.

User interfaces types in the system limit access to data appropriately and to what is essential.

Personal data of contractors, customers or customers' customers is not transferred outside the ERP system.

For data security reasons, customers get an order confirmation by email without their customer's personal data.

The complete order details can be inspected by the customer and the contractor in the ERP system using an individual customer identifier generated for the order.

All passwords in the ERP system are encrypted, and are not stored anywhere in unencrypted form.

The administrator of the ERP system has access to the system, and the administrator is also bound by a written non-disclosure agreement.

## **Data subjects' rights**

Data subjects (customers/contractors) can see their data directly in the ERP system.

System users can independently amend data on them, such as contact details. Data subjects are entitled to request rectification of data on them.

Data subjects are entitled to prohibit the controller from processing data on them for the purposes of direct marketing, distance sales and other direct marketing as well as market and opinion surveys. Requests may be made by email to [polaris@polariskielipalvelut.fi](mailto:polaris@polariskielipalvelut.fi).