

Privacy Policy

Appendix No. 3 to the Terms and Conditions of the Portal www.legalenglishexpert.com available at <https://legalenglishexpert.com/terms-and-conditions/>

Hi there!

If you are here, it means that you value your privacy. I fully understand that and that is why I have prepared for you this document, where you will find rules governing the processing of personal data and the use of cookies in connection with the use of the Portal available at <https://legalenglishexpert.com/> and the Online Store which is a part of the Portal.

Formal information to start with: I, Anna Mlodawska, am the Administrator of the Portal available at <https://legalenglishexpert.com/> and the personal data collector. I am a sole proprietor doing business as Transkrypt Anna Mlodawska, having the registered office at the following address: 111 Marszalkowska Street, 00-102 Warsaw, Poland, EU, VAT No. PL6581766906, entered into the Central Register of Sole Proprietorships under No. 439553.

In case of any doubts or questions related to the Privacy Policy, you can contact me and my team at contact@legalenglishexpert.com.

Best regards,

Anna Mlodawska

Owner of the "Transkrypt Anna Mlodawska" firm and the "Legal English Expert" Portal

Short-form version - the most important information

We care about your privacy but also about your time. That is why we have prepared for you a summary of the most important rules concerning privacy protection.

1. While making purchases via the Portal, submitting a complaint, rescinding a contract, subscribing to the Newsletter, or simply contacting us, you provide us with your personal data and we guarantee to you that your data will remain confidential, safe, and will not be disclosed to any third parties without your express consent.

2. Among the personal data we process, there may be in particular the following data: first name, last name, email address, residence address, registered name of a business, registered office of a business, Tax ID No./VAT No., IP address.
3. We make all reasonable efforts to keep your personal data safe and protect them from unauthorised access.
4. We disclose your personal data solely to trusted entities which provide services related to personal data processing.
5. We do not use profiling mechanisms using personal data.
6. We give you the possibility to exercise your rights following from GDPR¹ related to our processing of your personal data.
7. By means of tools available in that respect, we automatically adjust the contents of the website to your individual interests, needs, preferences, and actions taken by you as part of our website in the past.
8. We use tools basing on cookies, both our own cookies and cookies of third parties. As part of such tools, we do not have access to information allowing your identification. These are various analytical, marketing, social media, and communication tools. Some of them entail implementation of special tracking scripts.
9. We give you the possibility to manage cookie settings directly from the level of our website. You can switch on and off individual tools and their corresponding cookies.
10. You can also manage cookie settings from the level of your internet browser or by installing special add-ons allowing control over cookies such as Ghostery (<https://www.ghostery.com>).
11. In the contents of the website, there may be links to external websites managed by third parties. We are not liable for rules governing the processing of personal data and the use of cookies by administrators of external websites. You can find details in that respect in privacy policies of such external websites.
12. The website is hosted by an external server, which - just like any other server - generates logs. Logs store information such as IP address, date and time of the server, information about the internet browser and the operating system. Logs are used solely for operational and technical purposes.

¹ 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, and repealing Directive 95/46/EC (General Data Protection Regulation)

The above information is of an introductory nature. We encourage you to get acquainted with further information that you will find below.

Long-form version

Personal data

The collector of your personal data is: Anna Mlodawska, sole proprietor doing business as Transkrypt Anna Mlodawska, having the registered office at the following address: 111 Marszalkowska Street, 00-102 Warsaw, Poland, EU, VAT No. PL6581766906, entered into the Central Register of Sole Proprietorships under No. 439553, email: contact@legalenglishexpert.com.

Purposes, legal grounds, and duration of the processing of personal data are specified separately for each purpose of data processing (see: description of individual purposes of personal data processing below).

Rights. GDPR grants to you the following potential rights related to the processing of your personal data:

1. right to access your data and receive a copy of them,
2. right to rectification (correction) of your data,
3. right to erasure of your data (if in your opinion there are no grounds for us to process your data, you may demand their erasure),
4. right to restriction of the processing of data (you may demand restriction of the processing of your data solely to their storage or performance of specific actions arranged with you if in your opinion we have inaccurate data or we process them without a valid ground),
5. right to object to the processing of your data (you have the right to object to the processing of data on the ground of a legitimate interest; you should specify a special situation which in your opinion justifies our cessation of the processing covered by your objection. We will cease to process your data for such purposes unless we prove that the grounds for the processing override your rights or that your data are necessary for us for the establishment, exercise or defence of claims),
6. right to data portability (you have the right to receive from us, in a structured, commonly used and machine-readable format, the personal data you provided to us under a contract or upon your consent; you may order us to transmit such data directly to another entity),

7. right to file a complaint with a supervisory authority (if you are of the opinion that we process data in a way non-compliant with applicable legal provisions, you may file a complaint about that to a competent supervisory authority).

The rules related to the exercise of the above mentioned rights are described in detail in Articles 16-21 of GDPR. We encourage you to get acquainted with these provisions. On our part, we would like to explain to you that the above mentioned rights are not absolute and you will not be entitled to exercise them with regard to all activities of personal data processing.

We would like to emphasize that the right you always have - if you are of the opinion that we have violated legal provisions while processing your personal data - is the right to file a complaint with a competent authority (e.g. in Poland it is the President of the Personal Data Protection Office).

You may also always demand that we provide you with information about what data concerning you we have and for what purposes we process them. To do that, please send an email with such demand to contact@legalenglishexpert.com. Nevertheless, we have made reasonable efforts to present information that may be of interest to you in this Privacy Policy. You can send an email to the above mentioned email address also if you have any other questions as to the processing of your personal data.

Security. We ensure confidentiality of all personal data provided to us. We ensure that adequate security measures and measures for the protection of personal data required by personal data protection provisions are taken. Personal data are collected with due care and are adequately protected from access by unauthorized persons.

Data recipients. Your personal data may be processed by entities whose services we use and whose services entail or may entail processing of personal data. These include but are not limited to the following entities:

1. hosting provider - your personal data are stored at a server,
2. email provider - processing of your personal data occurs as part of email exchange,
3. invoice system provider - in respect of processing in the invoice system of personal data necessary to issue an invoice,
4. accounting firm - the accounting firm processes your personal data contained in invoices and other accounting documents,

5. law firm - the law firm may get access to your personal data if it is necessary for the provision of legal services to us,
6. firm providing technical services related to the operation of the website - the entity may get access to your data in connection with technical works concerning the areas where your personal data are stored,
7. courier or post firms - in respect of processing of personal data necessary for mailing to you certificates, letters or products,
8. other subcontractors - we cooperate with various subcontractors which may get access to your personal data if they provide services within the scope entailing such access.

Your personal data may be also provided to tax authorities within the scope necessary for us to fulfill our tax settlement and accounting obligations. This may be the case with various tax returns, declarations, reports and other accounting documents where your personal data may be stated.

Furthermore, if necessary, your personal data may be made available to entities, authorities, or institutions authorized to get access to your data under legal provisions, such as the police, state security authorities, courts, public prosecutor's office.

Personal data processing purposes and activities

Orders. By placing an order, you have to specify data necessary to handle the order, such as first name, last name, invoice data (including residence address or registered office address), email address, phone number (where applicable), Tax ID No./VAT No. Provision of such data is voluntary but necessary for placing an order.

Data provided to us in connection with an order are processed with a view to performance of the contract concluded by way of your placing the order (Article 6 (1) (b) of GDPR), issuance of the invoice (Article 6 (1) (c) of GDPR), including the invoice in accounting documentation (Article 6 (1) (c) of GDPR), as well as for archiving and statistical purposes (Article 6 (1) (f) of GDPR).

Data concerning orders will be processed for a period necessary for performing the order, and subsequently until the lapse of the time of prescription of claims under the concluded contract. Moreover, after the lapse of that time, the data may be still stored for archiving and statistical purposes, in particular for the purpose of identification of a returning client. Please remember also that we are obliged to store invoices with your personal data for 5 years after the end of the fiscal year in which the tax liability came into being.

In the case of data about orders, you have no possibility to rectify (correct) such data after the performance of an order. You cannot also object to processing of data or demand erasure of data until the lapse of the time of prescription of claims on account of the concluded contract. Similarly, you cannot object to processing of data or demand erasure of data contained in invoices. After the lapse of the time of prescription of claims on account of the concluded contract, you may only object to our processing of your data for statistical purposes and demand deletion of your data from the database.

Retrieving abandoned carts. If you initiate the process of placing an order but you do not complete it, that fact will be recorded by our system and you will receive to your email address a notification about the possibility to complete the order. To that end, we process your personal data collected by us in connection with your initiation of placing an order. We base the processing of data in that case on our legitimate interest (Article 6 (1) (f) of GDPR). You may object to processing of your data for the purposes of retrieving abandoned carts by sending an email to us to contact@legallenglishexpert.com.

Complaints and rescission of a contract. If you submit a complaint or if you rescind a contract, you provide us with personal data contained in the wording of the complaint or in the declaration of rescission, including first name, last name, residence address, phone number, email address, bank account number (where applicable). Provision of such data is voluntary but necessary to submit a complaint or rescind a contract.

The data provided to us in connection with submitting a complaint or rescission of a contract are used to handle the process of examination of a complaint or the process of rescission of a contract (Article 6 (1) (c) of GDPR), and subsequently for archiving purposes, which constitutes our legitimate interest (Article 6 (1) (f) of GDPR).

The data will be processed for the time necessary to carry out the process of examination of a complaint or the process of rescission. Complaints and declarations of rescission may be additionally archived in order to prove in the future the course of the process of examination of a complaint or the process of rescission of a contract.

In the case of data contained in complaints and declarations of rescission of a contract you do not have the possibility to rectify (correct) such data. Moreover, you cannot object to processing of the data or demand erasure of such data until the lapse of the time of prescription of claims on account of the concluded contract. After the lapse of the time of prescription of claims on account of the concluded contract, you may, however, object to processing of your data, as well as of demand erasure of your data from the database.

Newsletter. Subscribing to the Newsletter, you provide to us your email address and first name.

Provision of the email address is voluntary but necessary to subscribe to the Newsletter.

The data provided to us during the process of subscribing to the Newsletter are used for the purpose of sending to you the newsletter and the legal ground for the processing is your consent (Article 6 (1) (a) of GDPR) expressed during your subscribing to the Newsletter.

You may resign from receiving the Newsletter at any time by clicking the dedicated link included in each email sent by us as part of the Newsletter or simply contacting us. Despite your resignation from the Newsletter, your data will still be stored in our database with a view to possible defence of claims related to sending the Newsletter to you, in particular for the purposes of indicating the fact that you have granted the consent to receive the Newsletter and the moment of its withdrawal, which constitutes our legitimate interest referred to in Article 6 (1) (f) of GDPR.

You may rectify (correct) your data included in the Newsletter database at any time. In the situation where you object to the processing of your personal data, demanding at the same time erasure of your data from our database, we will have to inform you that in view of our legitimate interest referred to in the preceding indent we will not remove your data from the database. Erasure of such data would prevent us from proving, if needed, the fact that you have granted in the past the consent to receiving the Newsletter.

The mailing system that we use tracks your actions taken in connection with emails sent to you. Thus, we have information which emails you have opened, in which emails you have clicked links, etc.

Contact. By contacting us, you naturally provide us with your personal data contained in the correspondence, in particular your email address and your first name. Provision of such data is voluntary but necessary to initiate contact.

Your data in this case are processed for the purpose of the contact with you and the ground for the processing is Article 6 (1) (f) of GDPR, namely our legitimate interest. The legal ground for the processing after the completion of the contact is also our legitimate interest in the form of archiving the correspondence for internal purposes (Article 6 (1) (f) of GDPR).

The wording of the emails exchanged may be archived and we are not able to unequivocally specify when it will be deleted. You have the right to demand that we present to you the history of email exchange you had with us (if it has been archived), as well as demand that we erase it, unless its

archiving is legitimate in view of our overriding interests, such as defence of potential claims on your part.

Marketing of own products and services. While using our services and placing an order, you provide us with your personal data, such as first name and last name, invoice data (including residence address or registered office address), email address, phone number, if applicable, Tax ID No./VAT No. Provision of the data is voluntary but necessary to place an order or use our services.

Your data are in that case processed for the purpose of marketing of our services and products and the ground for the processing is Article 6 (1) (f) of GDPR, namely our legitimate interest. Moreover, your data will be stored in our database with a view to potential defence, establishment and exercise of claims related to the contract concluded with us, as well as for the purpose of identification of a returning client, which constitutes our legitimate interest, referred to in Article 6 (1) (f) of GDPR.

The data will be stored for the time of the existence of the Portal Administrator's business, unless you earlier object to processing of your personal data and we do not have an overriding interest in further processing of the data covered by the objection. At any time, you may object to processing of your data for the purpose of marketing of our own products or services, which will result in that we will stop sending any advertising materials to you. If the time of prescription of claims following from the contract between us has lapsed, you may also object to processing of your data in any way, which will result in their permanent erasure from the database.

Cookies and other tracking technologies

Our website, similarly to almost all other websites, uses cookies.

Cookies are small text information stored in your terminal device (e.g. computer, tablet, smartphone), which may be read by our IT system (own cookies) or by the IT system of third parties (cookies of third parties).

Some cookies used by us are deleted after the completion of a session of the Internet browser, i.e. after its closing (the so-called serial cookies). Other cookies are kept in your terminal device and recognise you browser when you visit our website again (permanent cookies).

If you want to find out more about cookies as such, you may get acquainted e.g. with this material: https://pl.wikipedia.org/wiki/HTTP_cookie.

Below you will find detailed information about cookies operating as part of our website.

Consent to cookies. During your first visit at our website, you will see displayed information concerning the use of cookies together with a question about your consent to the use of cookies.

Thanks to a special tool, you have the possibility to manage cookies from the level of the website, by switching off individual cookies.

Moreover, you can always change the cookies settings from the level of your browser or delete cookies. Browsers manage the cookies setting in various ways. In the menu of the Internet browser, you will find explanations concerning modification of the cookies settings.

You can also manage the cookies settings by installing special add-ons allowing control over cookies, such as: Ghostery (<https://www.ghostery.com>).

Please remember that switching off or limiting cookies may cause difficulties while using our website and many other websites which use cookies.

Own cookies. Own cookies are used by us for the purpose of ensuring correct operation of the website. Own cookies also store information about your consent to the use of cookies and information about the cookies settings defined by you as part of our website. Own cookies are used also by a script responsible for the mechanism of retrieving abandoned carts. It means that cookies may contain information about the contents of your cart, recently viewed products, etc.

Cookies of third parties. Our website, similarly to most modern websites, uses functions provided by third parties, which entail the use of cookies coming from third parties. The use of such cookies is described below.

Google Analytics. We use the Google Analytics tool provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Activities in that respect are performed by us basing on our legitimate interest consisting in creation of statistics and their analysis with a view to optimising our websites.

Google Analytics automatically collects information about your use of our website. The information collected in that way is most frequently provided to the server of Google in the United States and stored there.

In view of the anonymization of your IP address activated by us, your IP address is shortened before transmitting. Only in exceptional cases, your full IP address is provided to the Google server in the United States and shortened there. The anonymized IP address provided by your browser as part of Google Analytics, in principle, is not combined with other Google data.

We would like to emphasize that as part of Google Analytics we do not collect any data which would allow your identification. Therefore, the data collected as part of Google Analytics do not have the nature of personal data. Information to which we have access as part of Google Analytics include in particular the following:

- information about the operating system and the Internet browser that you use,
- individual sites that you viewed as part of our Portal,
- time that you spent in our Portal and on its individual sites,
- your moving between individual sites in our Portal,
- the source from which you came to our website.

Moreover, we use, as part of Google Analytics, the following advertising functions:

- demographic and interest reports,
- remarketing,
- functions of reporting about advertisements, user-ID.

As part of the Advertising Functions, we do not collect personal data. Information to which we have access includes in particular the following:

- your age range,
- your gender,
- your approximate location limited to the city/town/village,
- your interests determined on the basis of your activity in the Internet.

In order to use Google Analytics, we have implemented in the code of our website a special tracking code of Google Analytics. The tracking code uses cookies of Google LLC in respect of the Google Analytics service. From the level of our website, using the mechanism intended to manage cookies, you can switch off the Google Analytics tracking code. At any time, you may also block the Google Analytics tracking code by installing the add-on for the Internet browser made available by Google: <https://tools.google.com/dlpage/gaoptout>.

The Google Analytics and Google Analytics 360 services have obtained the certificate of the independent security standard ISO 27001. ISO 27001 is one of the most frequently recognised in the world and it certifies compliance with applicable requirements by systems handling Google Analytics and Google Analytics 360.

If you are interested in details related to data processing as part of Google Analytics, we encourage you to get acquainted with explanations prepared by Google: <https://support.google.com/analytics/answer/6004245>.

Facebook Ads and Insights. We use marketing and analytical tools available as part of the Facebook service. The provider of these tools is Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA. Activities in that respect are performed by us basing on our legitimate interest consisting in the marketing of own products or services, as well as analytics and statistics.

In order to present to you advertisements personalised in terms of your behavior in our Portal, we have implemented as part of our website the Facebook Pixel, which automatically collects information about your use of our Portal in respect of viewed websites. The information collected in that way is most frequently transmitted to the server of Facebook in the United States and stored there.

Information collected as part of the Facebook Pixel is anonymous, i.e. it does not allow us to identify you. We know only what activities you have taken as part of our Portal. We may also check your age range, your gender, the place from which you connect with the Internet. Facebook Insights may provide us also with information about you, but this is never information allowing your identification.

Nevertheless, we would like to inform you that Facebook may combine the collected information with other information about you collected as part of your use the Facebook service and use it for its own purposes, including marketing purposes. Such actions of Facebook are independent from us and information about them may be found directly in the privacy policy of Facebook: <https://www.facebook.com/privacy/explanation>. From the level of your Facebook account, you may also manage your privacy settings. Here you can find useful information about that: <https://www.facebook.com/help/568137493302217>.

From the level of our website, using the mechanism intended to manage cookies you can switch off the Facebook Pixel.

Content from external websites. We embed at our website content from external websites, including videos from YouTube and Vimeo. In connection with that, cookies of Google LLC related to the YouTube service, including DoubleClick cookies, and cookies of Vimeo Inc. are used.

When you play videos or get acquainted with other embedded content, Google or Vimeo receive information about that, even if you do not have a profile with a given provider or if you are not logged in. Such information (together with your IP address) is sent by your browser directly to the server of a given provider (some servers are located in the USA) and stored there.

If you have logged into the service of a given provider, the service provider may directly ascribe a visit at our website to your profile in a given social media service. The purpose and scope of collection of data and their further processing and use by service providers, as well as the possibility of contact and your rights in that respect, as well as the possibility to modify settings allowing protection of your privacy are described in the privacy policy of individual service providers.

If you do not want service providers to ascribe data collected during your playing videos or getting acquainted with other content at our website directly to your profile in a given service, then before visiting our website you need to log out of that service. You may also fully prevent loading of plugins at the website by using adequate add-ons for your browser, e.g. blocking scripts.

Cookies related to YouTube are loaded not earlier than at the time of playing a video, so if you do not want that to happen, abstain from watching the video.

Social media tools. At our website, we use plugins and other social media tools made available by social media such as: Facebook, Twitter, Instagram, Google, LinkedIn.

While viewing our website containing such a plugin, your browser will make a direct connection with the servers of the administrators of the social media services (service providers). The contents of the plugin are transmitted by a given service provider directly to your browser and integrated with the website. Thanks to the integration, the service providers receive information that your browser has displayed our website, even if you do not have a profile with a given service provider or you are not logged in at a given time. Such information (together with your IP address) is sent by your browser directly to the server of a given provider (some servers are located in the USA) and stored there.

If you are logged into one of the social media services, the service provider will be able to directly ascribe your visit at our website to your profile in a given social media service.

If you use a given plugin, e.g. by clicking the buttons "Like" or "Share", relevant information will also be sent directly to the server of a given service provider and kept there.

Moreover, such information will be published in a given social media service and will be displayed to persons added as your contacts. The purpose and scope of collection of data and their further processing and use by service providers, as well as the possibility of contact and your rights in that respect, as well as the possibility to modify settings allowing protection of your privacy are described in the privacy policy of individual service providers.

- Facebook – https://www.facebook.com/legal/FB_Work_Privacy,
- Twitter – <https://twitter.com/en/privacy>,
- LinkedIn – <https://www.linkedin.com/legal/privacy-policy>,
- Google – <https://policies.google.com/privacy?hl=pl>,
- Instagram – <https://help.instagram.com/155833707900388>.

If you do not want social media services to ascribe data collected during your visit at our website directly to your profile in a given service, then before visiting our website you need to log out of that service. You may also fully prevent loading of plugins at the website by using adequate add-ons for your browser, e.g. blocking scripts.

Sumo. We use the Sumo tool provided by Sumo Group Inc. 601 E Cesar Chavez St Austin, TX 78702 United States, which allows us to present to you personalised messages while you are using our Portal. Activities in that respect are performed by us basing on our legitimate interest in the form of marketing of own products and services.

In order to present to you messages personalised in terms of your behavior in our Portal, we use the functions of the Sumo tool, which automatically collects information about your use of our Portal. Information collected in that way is most frequently provided to the server in the United States and stored there.

In view of the fact that Sumo Group Inc. has its registered office in the USA and uses the technical infrastructure located in the USA, it has joined the program EU-US-Privacy Shield in order to ensure adequate level of personal data protection required by the European Union legal provisions. As part of the agreement between the USA and the European Commission, the latter has determined adequate level of protection of data in the case of enterprises having the Privacy Shield certificate.

As part of the cookies settings available from the level of our website you may object to the use of the Sumo tool.

Server logs. The use of the website entails sending queries to the server at which our website is stored. Each query addressed to the server is recorded in server logs.

The logs cover *inter alia*: your IP address, data and time of the server, information about the Internet browser and operating system that you use. The logs are recorded and stored at the server.

The data recorded in server logs are not ascribed to specific persons using the website and are not used by us for the purpose of your identification.

Server logs constitute solely an auxiliary material intended for administration of the website and their contents are not disclosed to anybody apart from persons authorised to administer the server.