

PRIVACY POLICY

FOR

THE LOCAL WORD S.R.L

Translation Management & Localisation Applications

This Privacy Policy –document subjects to Translation Management & Localisation Services in Cloud Computing within solely owned and operated applications by The Local Word S.r.l. (hereinafter “TLW”) The platforms; TransCloud and TransPro Digital (hereinafter “TC” and “TP”) TLW values the privacy of the Customers and its Users as a rock bottom for long-term business relations who visit at TC and TP Platform (collectively or individually, “Customer” or “Users”).

By using the TC and TP Platform, Customer expressly consent to the information handling practices described in this notice.

This Privacy Notice is incorporated to TLW’S GENERAL TERMS OF USE for Translation Management & Localisation Applications. The Customers use of the TC and TP Platform and any personal information Customer provide through the TC and TP Platform are subject at all time to this Privacy Policy. Terms for “TC and TP Platform” apply to any site or mobile application owned and operated by TLW,

1. The Information TC and TP Collects
2. The Way TLW Uses Information collected from TC and TP Platform
3. When TC and TP Discloses Information
4. Customers Choices
5. Third-Party Advertisers
6. TLW’s commitment to Data Security
7. International Visitors
8. In the Event of Merger or Sale
9. Changes and Updates to this Privacy Policy
10. TC and TP Contact Information

1. The Information TC and TP Collects

- **User-provided Information:** Customer may provide to TC and TP what is generally called “personally identifiable” information (such as Customers and its Users name, email address, postal mailing address, home/mobile telephone number) if a Customer log in to the TC and TP Platform, or otherwise use the features and functionality of the TC and TP Platform. Customer

may also provide other information to TC and TP, including Customers work profession, location, and gender, through use of its functionality and features, such as by creating a User profile.

- **“Cookies” Information:** TC and TP Platform do not send or handle any cookies information.
- **“Automatically Collected” Information:** When a Customer accesses the TC and TP Platform; TLW may automatically record certain information from Customers’ system by using different types of tracking technology. This “automatically collected” information may include Internet Protocol address (“IP Address”), a unique device or user ID, version of software installed, system type, the referring search query used to locate content and pages on the TC and TP Platform, the content and pages that Customer access on the TC and TP Platform, the dates and times that Customer visit the TC and TP Platform.

2. The Way TLW Uses Information collected from TC and TP Platform

- TLW uses the information that Customer provide or that TLW collect to operate, maintain, enhance, and provide all of the features and services found on the TC and TP Platform as well as to track user-generated content and Users to the extent necessary to comply as a service provider.
- TLW will use Customers email address, without further consent, for administrative communications such as notifying Customer of major TC and TP Platform updates, for customer service purposes, to address copyright infringement or defamation issues, or to contact Customer regarding any content that Customer have posted to or downloaded from the TC and TP Platform.
- TLW uses all of the information that TLW collect to understand the usage trends and preferences of TLW’s Users, to improve the way the TC and TP Platform works and looks, and to create new features and functionality.
- TLW uses “Automatically Collected” information to: (a) automatically update the TC and TP application on Customer system; (b) remember Customers information so that Customer will not have to re-enter it during Customers visit or the next time Customer access the TC and TP Platform; (c) monitor aggregate site usage metrics such as total number of visitors and pages accessed; (d) provide such metrics to Users as they pertain to such User’s uploaded content; and (e) track Customers entries, submissions, and status in any promotions or other activities.

3. When TLW Discloses Information

- TLW do not share Customers personally identifiable information with other organizations for external uses. TLW do not disclose aggregated or other types of non-personally identifiable information to third parties for various purposes, including marketing or promotional uses.
- Please be aware that any personally identifiable information or profile information is not publicly available.
- TLW may disclose User information to affiliated companies or other businesses or persons to: provide web site hosting, maintenance, and security services; fulfil orders; conduct data analysis and create reports; offer certain functionality; and assist TC and TP in improving the TC and TP Platform and creating new services features. We require that these parties process

such information in compliance with this Privacy Notice, we authorize only a limited use of such information, and we require these parties to use reasonable confidentiality measures.

- TLW may disclose User information if required to do so by law or in the good-faith belief that such action is necessary to comply with laws of Italian state (such as European Copyright law) or respond to a court order, judicial or other government subpoena, or warrant in the manner required by the requesting entity.
- TLW also reserves the right to disclose User information that TLW believe, in good faith, is appropriate or necessary: to take precautions against liability; to protect TC and TP from fraudulent, abusive, or unlawful uses; to investigate and defend ourselves against third-party claims or allegations; to assist government enforcement agencies; to protect the security or integrity of the TC and TP Platform; or to protect the rights, property, or personal safety of TC and TP Users, or others.

4. Customers Choices

Customer may update, correct, or delete Customer user information and preferences at any time.

To protect Customers privacy and security, TLW take reasonable steps to verify Customers identity before granting Customer account access or making corrections to Customer information.

CUSTOMERS ARE RESPONSIBLE FOR MAINTAINING THE SECRECY OF CUSTOMERR UNIQUE PASSWORD AND ACCOUNT INFORMATION AT ALL TIMES.

5. Third-Party Advertisers

TC and TP adhere to the Digital Advertising Self-Regulatory Principles, not to publish any third-party adverts.

6. TLW'S COMMITMENT TO DATA SECURITY

TLW USES COMMERCIALY REASONABLE PHYSICAL, MANAGERIAL, AND TECHNICAL SAFEGUARDS TO PRESERVE THE INTEGRITY AND SECURITY OF CUSTOMERS PERSONAL INFORMATION. TLW CANNOT, HOWEVER, ENSURE OR WARRANT THE SECURITY OF ANY INFORMATION CUSTOMER TRANSMITS TO TC AND TP PLATFORM, AND CUSTOMER DO SO AT CUSTOMERS OWN RISK. ONCE TLW RECEIVES CUSTOMERS' TRANSMISSION, TLW MAKES COMMERCIALY REASONABLE EFFORTS TO ENSURE THE SECURITY OF TLW SYSTEMS. HOWEVER, PLEASE NOTE THAT THIS IS NOT A GUARANTEE THAT SUCH INFORMATION MAY NOT BE ACCESSED, DISCLOSED, ALTERED, OR DESTROYED BY BREACH OF ANY OF OUR PHYSICAL, TECHNICAL, OR MANAGERIAL SAFEGUARDS.

IF A SECURITY SYSTEMS BREACH, THEN TLW MAY ATTEMPT TO NOTIFY CUSTOMER ELECTRONICALLY SO THAT CUSTOMER CAN TAKE APPROPRIATE PROTECTIVE STEPS. TC AND TP MAY POST A NOTICE ON THE TC AND TP PLATFORM IF A SECURITY BREACH OCCURS. DEPENDING ON WHERE CUSTOMER LIVES, CUSTOMER MAY HAVE A LEGAL RIGHT TO RECEIVE NOTICE OF A SECURITY BREACH IN WRITING. TO RECEIVE A FREE WRITTEN NOTICE OF A SECURITY BREACH CUSTOMER SHOULD NOTIFY TLW AT info@thelocalword.net

8. INTERNATIONAL VISITORS

FOR USERS VISITING THE TC AND TP PLATFORM FROM THE EUROPEAN ECONOMIC AREA OR OTHER, PLEASE NOTE THAT ANY DATA CUSTOMER ENTER INTO THE TC AND TP PLATFORM WILL BE TRANSFERRED TO TLW'S TRUSTED CLOUD COMPUTING SERVICE PROVIDER.

OUTSIDE THE EUROPEAN ECONOMIC AREA OR SUCH FOR USE BY TLW AND ITS AFFILIATES FOR ANY OF THE PURPOSES DESCRIBED HEREIN. IN ADDITION, BECAUSE TC AND TP OPERATES GLOBALLY, TLW MAY MAKE INFORMATION GATHER AVAILABLE TO WORLDWIDE BUSINESS UNITS AND AFFILIATES. BY PROVIDING ANY DATA ON THE TC AND TP PLATFORM, CUSTOMER HEREBY EXPRESSLY CONSENT TO SUCH TRANSFERS OF CUSTOMERS DATA TO THE COUNTRIES TLW HAVE HIRED TRUSTED CLOUD COMPUTING SERVICES.

9. IN THE EVENT OF MERGER OR SALE

IN THE EVENT THAT TLW IS ACQUIRED BY OR MERGED WITH A THIRD-PARTY ENTITY, TLW RESERVE THE RIGHT, IN ANY OF THESE CIRCUMSTANCES, TO TRANSFER OR ASSIGN THE INFORMATION THAT TLW HAVE COLLECTED FROM USERS AS PART OF THAT MERGER, ACQUISITION, SALE, OR OTHER CHANGE OF CONTROL.

10. CHANGES AND UPDATES TO THIS PRIVACY NOTICE

THIS PRIVACY NOTICE MAY BE REVISED PERIODICALLY WITHOUT FURTHER NOTICE TO CUSTOMER AND THIS WILL BE REFLECTED BY A "LAST MODIFIED" DATE BELOW. PLEASE REVISIT THIS PAGE TO STAY AWARE OF ANY CHANGES. IN GENERAL, TLW ONLY USE CUSTOMERS PERSONAL INFORMATION IN THE MANNER DESCRIBED IN THE PRIVACY NOTICE IN EFFECT WHEN TLW RECEIVED THAT PERSONAL INFORMATION. CUSTOMER'S CONTINUED USE OF THE TC AND TP PLATFORM CONSTITUTES CUSTOMER'S AGREEMENT TO THIS PRIVACY NOTICE AND ANY FUTURE REVISIONS.

FOR REVISIONS TO THIS PRIVACY NOTICE THAT MAY BE MATERIALLY LESS RESTRICTIVE ON TLW USE OR DISCLOSURE OF PERSONAL INFORMATION CUSTOMER HAVE PROVIDED TO TLW AND WILL MAKE REASONABLE EFFORTS TO NOTIFY CUSTOMER AND OBTAIN CUSTOMER'S CONSENT BEFORE IMPLEMENTING REVISIONS WITH RESPECT TO SUCH INFORMATION.

11. TC AND TP CONTACT INFORMATION

PLEASE CONTACT TLW WITH ANY QUESTIONS OR COMMENTS ABOUT THIS PRIVACY NOTICE, CUSTOMER'S PERSONAL INFORMATION, AND OUR THIRD-PARTY DISCLOSURE PRACTICES OR CUSTOMER'S CONSENT CHOICES AT: BY EMAIL: info@thelocalword.net. WE WILL RESPOND TO CUSTOMER'S INQUIRY WITHIN 30 DAYS OF ITS RECEIPT.