

# Privacy Policy

## Inter Aramo Solutions S.L.

**(Inter Aramo Solutions S.L. is a joint partnership between Daniel González Bernardo and Leah Black)**

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Thank you for your interest in the activities of Inter Aramo Solutions S.L. Inter Aramo Solutions S.L. is a partnership between Daniel González Bernardo operating under the brand of "DG Multilingual Services" (<https://www.dgmultilingualservices.com/>) and Leah Black operating under the brand of "Ecoinnnersense" (<https://ecoinnersense.com>). Your privacy is of vital importance to us. Through this document we want to assure you that your personal information and data will be kept safe and confidential.

Personal data you choose to provide is collected by us in order to answer your requests and contact you to carry out our services. Personal data is also collected to enable us to monitor site traffic using third-party services such as Google Analytics. Please read the following information to find out, more in-depth, how we use your data:

### 1. Who We Are:

We, Daniel González Bernardo (Translator) and Leah Black (Coach & Trainer), part of Inter Aramo Solutions S.L., are fully committed to maintaining the trust of our clients, partner organisations, colleagues, suppliers and service users and visitors to our websites. This Privacy Policy outlines when, why and what personal data we may collect, how we use it, the limited conditions under which we may disclose it to others, and how we keep it secure.

Each of us acts as the data protection officer for our own division. You may contact us in our capacity as Data Controllers of the data under our powers, duties and liabilities, via email to Daniel González Bernardo at [daniel@dgmultilingualservices.com](mailto:daniel@dgmultilingualservices.com) or Leah Black at [leah@ecoinnersense.com](mailto:leah@ecoinnersense.com).

### 2. Definitions

The terms "we", "us", "our" and "ours" refer to Daniel González Bernardo and Leah Black of Inter Aramo Solutions S.L. The terms "The Client", "you," "your," and "yours" refer to the user or viewer of the Website or user of the Services, as applicable. "Services" refers to translation, transcription, interpreting, language training, subtitling, voice-over, audio and video editing, desktop publishing, SEM & SEO, language consultancy, and coaching, mentoring, training, video interviewing, video recorded sessions, workshop facilitation, consultancy, webinars and any other services we may perform in order to fulfil our services and the contract with the client.

### 3. Collection of Personal Data

Personal data means any information relating to an identified or identifiable natural person, such as for instance your contact information, identification number, location data, an online identifier, etc. We adhere to the following principles when processing your personal data:

- 3.1. only collect personal data for specified and legitimate purposes;
- 3.2. not collect personal data beyond what is necessary to accomplish those purposes;
- 3.3. not use personal data for purposes other than that for which the data was collected, except as stated herein, or with prior consent;
- 3.4. not transfer personal data to third parties, except as stated herein, or with prior consent;

**3.5.** maintain appropriate measures to protect your personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access and against all other unlawful forms of processing; and

**3.6.** except when stated herein, not store personal data longer than is necessary to accomplish the purpose for which the data were collected or for which they are further processed, or as is required by law.

**3.7.** we will not sell your personal data, and will only share the said data with third parties when necessary and to the extent stated in this Privacy Policy.

## **Types of data collected**

### **4. IT-Related:**

#### **4.1 Cookies**

Like most websites, we may use cookies to collect data on our websites <https://www.dgmultilingualseervices.com/> and <https://ecoinnersense.com>. Cookies are small data files which are placed on your computer (PCs, smartphones or tablets) as you browse. They are used to remember when your computer or device accesses the website, they help it operate effectively and improve your user experience. The data collected includes pages viewed and your journey around the website. These cookies are not used to collect or record data on your name, address or other contact details. If you want to delete or block any cookies, please refer to the help and support area on your internet browser for instructions on how to locate the file or directory that stores cookies. Information on deleting or controlling cookies is also available at <https://tools.google.com/dlpage/gaoptout?hl=en> (note that this website is not provided by us, and we therefore cannot ensure its accuracy, completeness or availability). Please note that deleting cookies or disabling future cookies or tracking technologies may prevent you from accessing certain areas or features of the Services, or may otherwise adversely affect your user experience.

#### **4.2 Google Analytics**

When someone visits our aforementioned websites we may also collect certain information regarding your use of the Website or the Services via Google Analytics, including but not limited to: referring site/ad source, your activity (for example, what pages visited and for how long), IP address, browser and operating system, default language set on your computer, your geolocation (by country and region), etc. The Google privacy policy can be reviewed by you at: <https://policies.google.com/privacy?hl=en-US> (the link is valid at the time of updating this Privacy Policy, please check for updated versions). This data is only processed in a way which does not identify anyone.

#### **4.3 Social media**

This website also includes social media features such as social media links and share or like buttons. These features are provided by third-party social media platforms (e.g. LinkedIn, Instagram, Twitter, Facebook and YouTube). If and when data is collected in this way, its processing is governed by the privacy policy of the respective social media platforms and we do not take any responsibility for any of their policies, which the user will have accepted when joining that Social Media platform.

We do not recommend sharing personal data or confidential information via WhatsApp or social media messaging services like LinkedIn 'Messaging', Facebook 'Messenger', or Twitter Direct Messages. All confidential and sensitive communication should occur through our professional emails only. If we receive confidential information, accidentally, by WhatsApp or other social media messaging services we will inform you to send it again via email and we will delete this information off WhatsApp immediately.

## **5. Data collected**

### **5.1 Why we process your personal data.**

We may collect, store and use personal data for the purposes of issuing a quote and invoice, to provide our Services or to comply with legal requirements. We will not use the Client's personal data for marketing purposes. We will not sell the Client's details to any third parties,

and we will only share them as explained on 5.3 below. Personal data collected may include your name, postal address, email address, identification number, identification, tax number and telephone number. The legal basis for processing your data is to perform the Services you request, to take the necessary steps prior to fulfilling that request or comply with our legal obligations. When we accept a request for Services from you, we understand that the performance of the Service will not infringe any third party rights. If The Client is sending us data they do not have the rights for, they will be solely responsible for any complaints by the owner of the data.

## 5.2 Other data

From time to time we may receive data that we have not requested, for example a CV for us to take the sender into consideration for a potential professional collaboration. By doing this, the senders are allowing us to keep their CV on our Google Workspace email storage system or password protected electronic file, so that we can get in touch if their professional services are needed in the future. We will keep this data secure as explained on Paragraph 3.5 below. Your personal data is stored on the legal basis of legitimate interest, and if we are working together, we store your information on the basis of contractual necessity. These legal bases for storing your data are as defined in the EU General Data Protection Regulation (EU GDPR) of 2018. If you no longer wish us to keep your data for these purposes, you can contact Daniel González Bernardo at [daniel@dgmultilingualservices.com](mailto:daniel@dgmultilingualservices.com) or Leah Black at [leah@ecoinnersense.com](mailto:leah@ecoinnersense.com) and we will destroy the data in a secure manner.

## 5.3 Who else receives your personal data?

For administrative purposes, other parties may have access to your personal data, including our accountant, tax authorities and email hosting services. All these have access to your data in order to perform their services but are prohibited from using your personal data for other purposes. We may disclose your personal data to third parties to the extent required by law, court order or a decision rendered by a competent public authority and for the purpose of law enforcement. We may also be under the obligation to disclose data to third parties in order to establish, exercise or defend our legal rights.

### Clients of Leah Black:

- Leah Black may share your full name and email address for reporting coaching and mentoring hours for accreditation, or renewal of accreditation, with professional coaching bodies. The two professional coaching bodies Leah Black may share your name and email address with are The International Coaching Federation (ICF): <https://coachingfederation.org> and The European Mentoring and Coaching Council (EMCC): <https://www.emccglobal.org>. These professional coaching bodies may carry out an audit and contact you to confirm that you have been a client of Leah Black. If you do not consent for this information to be shared, for the aforementioned purpose, please inform Leah Black immediately.
- Leah Black receives supervision from a professionally certified coach supervisor. This supervision relationship is confidential. In the supervision process, you may be referred to anonymously within this context.
- Leah Black does not download any exercises completed as part of the coaching process, nor does she save copies of your emails. If you attach documents to an email, Leah Black will view these in the browser only without downloading.

### Clients of Daniel González Bernardo:

- Sometimes, Daniel González Bernardo may need to share certain data with a partner translator in order to perform the Services (for example for translations of languages not performed directly by himself). If Daniel González Bernardo sends a text for

translation, revision or editing to a fellow translator, that content will be anonymised as much as possible, so that your personal data does not appear. Furthermore, the partner translator will have to sign a Data Processing Agreement.

#### **5.4 External Links**

Our websites may contain links to third party websites such as social media sites, blogs, recommended websites, LinkedIn, or websites which contain examples of our work, and any other relevant websites. These websites may contain plug-ins, for instance social media login plug-in, or services. If you choose to use these websites, plug-ins or services, you may disclose your information to those third-parties. We are not responsible for the content or practices of those websites, plug-ins or services. The collection, use, and disclosure of your personal data will be subject to the privacy policies of these third parties and not this Privacy Policy. We urge you to read the privacy and security policies of the relevant third-parties.

#### **5.5 Communications**

We may contact you to notify you regarding your request for services, give you an update on our Services, request any clarifications that are needed in order to perform our Services, resolve a dispute, collect fees or monies owed. For these purposes we may contact you via email, telephone and postal mail.

#### **5.6 How long we keep your personal data**

Data in relation to quotes will be retained for up to 6 months. In the cases of work carried out, we are obliged to retain your personal data for 5 years to comply with tax obligations in Spain. We will delete email communications after 5 years. All emails containing your personal story and situation or other private information that you chose to share with us, which are not necessary to retain for legal reasons, will be deleted 12-months after your contract, or agreed service delivery with us has ended. Your emails will not be shared with or forwarded to third parties. Third parties will not be CC'd or BCC'd into any of your message without prior permission. Client invoices will be accessible and shared via secure email between Leah Black and Daniel González Bernardo for the process of legal tax reporting to our accountant. No other confidential details will be shared between Leah Black and Daniel González Bernardo about you.

#### **5.7 How we protect your data**

Your data will be kept on electronic form, including on Google Workspace email files or electronically on our computers and will be secured with password protection. The device(s) it's stored on will have an up-to-date firewall and antivirus. In the unlikely case that, for any reason, it is necessary to print part of your data, this content will be shredded or destroyed in a secure manner. Regardless of the measures and efforts taken by us, we cannot and do not guarantee the absolute protection and security of your Personal Data.

#### **5.8 Your data access rights & consent**

You are entitled to access, rectify, or erase the personal data that we hold. Please email your request directly to us at [daniel@dgmultilingualseervices.com](mailto:daniel@dgmultilingualseervices.com) or [leah@ecoinnersense.com](mailto:leah@ecoinnersense.com) and we will act upon this as soon as possible, with a maximum delay of one calendar month from the date of your request. Your personal data can be deleted unless we are entitled or obliged by applicable law and regulations to keep and process such information regardless of the withdrawal of your consent.

If you withdraw your consent, We and any third parties involved in personal data processing will cease to process your personal data, unless and to the extent the continued processing or storage is permitted or required according to the applicable personal data legislation or other applicable laws and regulations. Please note that as a consequence of your withdrawal of your consent, we may not be able to meet your requests or provide you with our Services. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

### **5.9 Your right to complain**

Should you have any concerns about how we process your personal data, please contact us. You also have the right to lodge a complaint with the supervisory body in Spain, where we are based, or in the country where you live.

### **6. Changes to this Privacy Policy & Validity**

We may modify or update this Privacy Policy when necessary to reflect changes in our services, changes in applicable legislation, regulations or practice and to address customer feedback. Accordingly, please review it periodically.

If you have any queries or concerns regarding this policy or your privacy and data usage by us, please don't hesitate to contact us:

Daniel González Bernardo (Translator) 'DG Multilingual Services' Partner in 'Inter Aramo Solutions S.L.' [daniel@dgmultilingualservices.com](mailto:daniel@dgmultilingualservices.com)

Leah Black (Coach & Trainer) 'Ecoinnernessense' Partner in 'Inter Aramo Solutions S.L.' [leah@ecoinnernessense.com](mailto:leah@ecoinnernessense.com)

*Inter Aramo Solutions S.L. Registered business in Asturias, Spain*

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