

Privacy and Cookies Policy

I. Privacy Policy

Glocalize Inc., a company incorporated under South Korean law with registered offices in California, United States, and Singapore (hereinafter, Glocalize) — in compliance with the requirements in Regulation (EU) 2016/679 of the European Parliament and Council of April 27, 2016 (General Data Protection Regulation, hereinafter GDPR) and South Korean data protection law — respects and protects the privacy of users of the site referred to as the glocalizeinc.com domain, putting in place every possible and proportionate effort not to harm the rights of its users.

The purpose of this privacy policy is to help users understand the procedures that Glocalize uses in the area of privacy, including what personal data is collected, why it is collected, how it is used, how it is protected, and which individual rights users possess.

This privacy policy does not apply to, and excludes our responsibility, in terms of privacy, information, or other practices of third parties, including third parties who manage websites or services to which the glocalizeinc.com site refers.

This privacy policy applies to all personal data that Glocalize acquires or processes when users interact with the glocalizeinc.com website. Examples include: purchasing and using our services, responding to marketing communications, and contacting Glocalize customer service. These interactions may involve visitors, clients, suppliers, and/or partners.

Furthermore, Glocalize processes personal data in areas other than the glocalizeinc.com site, which require other privacy policies.

II. General Information on Data Processing

In this privacy policy, the term “personal data” signifies information that refers to users. It allows us to identify users, directly or in combination with other information in our possession.

Users of the Site in General

Glocalize processes user data based on consent. By using or consulting Glocalize's site, users explicitly agree to this privacy policy and consent to the processing of their personal data in relation to the purposes and methods described below, including any disclosure to third parties, if necessary, for the provision of service. The provision of data and, consequently, the consent to the gathering and processing of data is optional. The user can deny consent and may revoke consent at any time. However, denying consent may make it impossible to provide certain services and the browsing experience on the site may be compromised.

Clients

Glocalize shall do everything possible, consistent with the electronic form of service, to maintain the utmost confidentiality in its performance of services. All texts, the nature of the work performed, the personal data of the client communicated for translation purposes, and any information transmitted by the client to Glocalize are subject to the strictest confidentiality and the personal data collected shall be processed in accordance with Article 6 of the GDPR.

In particular, Glocalize shall use the information provided for the execution of the contract (and for the eventual implementation of pre-contractual measures) and such information can

not — without the prior written consent of the client — be disclosed publicly or to third parties, except to its authorized employees or their authorized subcontractors, should their operational or advisory intervention require knowledge of such information. The above guarantees do not apply if Glocalize is obliged by law to disclose such information, or in the event that such information is, or enters, in the public domain regardless of the disclosure of the same by Glocalize. This similarly applies to cases in which the vital interests of the data subject or of another natural person require the processing of personal data, or where the processing is necessary for the protection of a legitimate interest of Glocalize or third parties, which is of a higher nature than the rights of the data subject.

Suppliers and Collaborators

The personal data of our freelance suppliers and collaborators (suppliers, translators, interpreters, graphic designers, affiliates, consultants, etc.) shall be treated in strict confidence. The only information that shall be communicated to third parties is the information published on our websites, such as username, mother tongue, work experience, and studies. Other information such as first name, last name, date of birth, addresses, and telephone numbers shall be processed only by Glocalize and its authorized suppliers (i.e., accountants, banks, etc.), exclusively for the purpose of the correct execution of the employment relationship with the same and fulfillment of any legal obligations.

III. Automatically Collected Information. Web Browsing Data

As with all websites, this site also makes use of log files in which information from user visits is automatically collected and stored. The information collected could include the following:

- Internet Protocol (IP) Address
- Type of browser and device parameters used to connect to the site

- Name of the Internet Service Provider (ISP)
- Date and time of visit/request
- Number of clicks, where applicable
- The method used to submit the request to the server
- Size of the file obtained in response
- Digital code indicating the status of the response given by the server
- Other parameters related to the operating system and the user's IT environment

The information listed above is handled automatically and collected in an exclusively aggregated form in order to verify the correct functioning of the site, and for security reasons. For the purposes of security (spam filters, firewalls, virus detection), automatically registered data may also include personal data such as IP address (the one that uniquely identifies, at least at that time, the host of origin), which could be used — in compliance with the laws in force on the subject — to block attempts to damage the site, harm other users, the carrying out of malicious activities, and activities that constitute a crime. This type of data is used to protect the site and its users.

The listed data is used for the sole purpose of obtaining anonymous statistical information on the use of the website and to check its correct functioning. Consequently, data is deleted immediately after processing. The data used for security purposes (the blocking of attempts to damage the site) is kept for seven days.

IV. Use of Cookies

Definition of Cookies

A cookie is a small text file sent to the browser by the visited website and then stored on the hard disk of the user's computer. When you connect to the website again, cookies are read

back and recognized by the website that sent them. While visiting a website, you may receive cookies from a third-party website (so-called “third-party cookies”), for example, links to web pages of other domains.

Cookies can be used for different purposes, such as allowing a website to recognize a user's device, or monitoring sessions and storing specific information about users accessing the server.

Types of Cookies

Technical Cookies are necessary for a website to function properly and to allow a user to make use of a service.

Functional Cookies are used to facilitate website navigation, store selected settings, and provide customized features.

Analytical Cookies are used by websites to collect information on usage habits, visited pages, and any errors that may occur during browsing. These cookies do not collect information that could identify the user's computer. All information collected by these cookies is aggregated and therefore anonymous.

By using the site, the visitor expressly consents to the use of cookies.

Disabling Cookies

Cookies are associated with the browser and can be disabled at any time directly from the browser, thereby refusing/withdrawing consent for the use of cookies. It should be noted that disabling cookies may prevent the proper use of some features on the site.

Each browser has a different procedure for managing settings. Below are specific instructions for each browser:

- [How to manage cookies in Internet Explorer](#)
- [How to delete cookies in Internet Explorer](#)
- [How to manage cookies in Firefox](#)
- [How to delete cookies in Firefox](#)
- [How to manage cookies in Chrome](#)
- [How to manage cookies in Safari and iOS](#)

V. Third-Party Cookies

This site also acts as an intermediary for third-party cookies, which are used to provide additional services and features to users. These also improve the user experience of the site via such things as buttons for social media, or videos. This site has no control over the cookies of third parties—they are entirely managed by third parties. As a consequence, information on the use of these cookies and their purpose, as well as how to disable them, are provided directly by the third parties on the pages indicated below.

DMP

Cookie Name: 3rdPlace

Purpose: 3rdPlace offers profiling and advertising services based on the behavior and interests of online users.

Type: Third party

Duration: Persistent

Consent: Required

More information: You can read the privacy policy and disable tracking at the following URL:
<https://thirdplace-pixel.appspot.com/policy/>

Social Network

This website also incorporates plugins and/or buttons for social networks, in order to allow easy sharing of content on your favorite social networks. These plugins are programmed so as not to set any cookies when users access the page in order to safeguard the privacy of users. Cookies may be set, if so provided by the social networks, only when the user makes effective and voluntary use of the plugin. Please note that if the user browses the website while logged in to the social network, then he/she has already given consent to the use of cookies conveyed through this site at the time of registration to the social network.

The collection and use of the data obtained by means of the plugins are regulated by the respective privacy policies of the social networks, to which reference should be made.

- [Facebook](#)
- [Instagram](#)
- [Twitter](#)
- [Linkedin](#)

VI. Newsletter and email

Users may receive emails from Glocalize for various reasons, such as for the confirmation of an order or the confirmation of the newsletter subscription, or to receive information on Glocalize services. Furthermore, for the purpose of optimizing and adapting our offerings,

we track (for example with the so-called “Tracking-Pixel”) whether an email has been opened and which links within the email have been clicked. We use this data to be able to send newsletter content that is tailored to the Customer.

Users may reject these types of processing by accessing www.glocalize.com, where, for example, they may change their online profile, or cancel the subscription to our newsletter, or contact the Data Controller at the address below.

VII. Data Processing Location

The data collected by this site is processed at the headquarters of the Data Controller and at the web hosting data center. The web hosting, GoDaddy Inc., which is responsible for the processing of data, and handles data on behalf of the Data Controller, is located in United States, North America, and acts in accordance with GDPR standards.

VIII. Transfer of Data in Non-EU Countries

This site may share some of the collected data with services located outside the European Union area. In particular with Google, Facebook, and Microsoft (LinkedIn) through social plugins and Google Analytics. The transfer is authorized on the basis of specific rulings of the European Union and the Guarantor for the protection of personal data, in particular, ruling 1250/2016 (Privacy Shield), for which no further consent is required. The companies mentioned above guarantee their adherence to the Privacy Shield.

IX. Safety Measures

This site processes the data of users in a lawful and proper manner, adopting appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of data. Processing is carried out by using computer and/or electronic tools, using appropriate measures at the organizational, technical, and administrative level in order to protect personal data within our company, using criteria strictly related to the purposes stated. However, no data transmission and no storage system can be guaranteed 100% security. Users who have reason to believe that their interactions with us are no longer secure are asked to kindly report the issue immediately.

In addition to the Data Controller, in certain cases, other parties involved in the running of the website may have access to stored personal data (administrative, sales, legal department, and system administrator personnel) or external individuals (such as third-party technical service providers, mail couriers, hosting providers, IT companies, and communication agencies) which may, if necessary, be appointed by the Data Controller to handle personal data.

The personal data of users shall be kept for as long as necessary, or permitted, in light of the purposes for which it is collected. The criteria adopted for determining storage times are as follows: (i) the period of time in which users regularly use the translated.com site; (ii) the need to fulfill a contract or a legal obligation to which we are subject; (iii) the opportunity to retain data in light of our legal position (for example, with regard to time limits, disputes, or regulatory compliance checks).

X. Rights of the User

Pursuant to the GDPR and Italian regulations, the user can, in the manner and within the limits established by current legislation, exercise the following rights in relation to his or her personal data:

- Request confirmation of the existence of personal data concerning him/her (right of access)
- To learn its origin
- Receive intelligible communications
- To have information about the criteria, the methods, and the purposes of the processing
- Request the updating, rectification, integration, cancellation, transformation into anonymous form, blocking of data processed in violation of the law, including that no longer necessary for the pursuit of the purposes for which it was collected
- In cases of consent-based processing, receive any support at-cost for data on yourself that has been provided to the Data Controller, in a structured and readable form, compiled by a data processor, and in a format commonly available on electronic devices
- Right to file a complaint with the Supervisory Authority
- As well as, more generally, exercise all the rights that are recognized by the current provisions of law

Requests should be addressed to the Data Controller. In particular, the user can exercise his or her rights in regard to the processing of personal data by accessing the www.glocalizeinc.com site, for example, by changing your online profile, or by canceling your subscription to our newsletter, or by contacting the Data Controller at the address provided above. We will respond to the request in accordance with the applicable laws. Users are invited to indicate in their request which personal data they wish to have modified, to inform us if they prefer that such data be deleted from our database, or to specify what limitations they wish to put on our use of their personal data. It is important to note that we may need to retain certain information for registration purposes and/or to complete the transactions initiated by users prior to requesting a change or cancellation.

XI. Special Information for Parents

The glocalizeinc.com site is not intended for children, as required by applicable laws, and we do not knowingly collect personal information from minors. However, Glocalize undertakes to comply with the provisions of the law where require the authorization of a parent or guardian to collect, use, or disclose the personal data of minors. We are committed to protecting the privacy of minors and we encourage parents and guardians to play an active role in their children's activities and interests on the net.

If a parent or guardian becomes aware that a minor child has provided us with their personal data without your consent, we invite you to contact the Data Controller at the address provided below. If we learn that a minor has provided us with their personal data, we shall remove it from our files.

XII. Data Controller

The Data Controller — in accordance with the GDPR and other offices' data protection laws, as well as other provisions on data protection — is Glocalize Inc, Seoul, South Korea, which can be contacted at the following email address: info@glocalizeinc.com.

Data Processor for processing is GoDaddy web hosting.

XIII. Data Protection Officer

Glocalize Inc. appointed Mr. Ryan Woon as its Data Protection Officer (DPO). The DPO can be reached at the following address: dataprotection@glocalizeinc.com.

XIV. Updates

This privacy policy was updated on Aug 6, 2021.