

## STRAKER PRIVACY POLICY

Last Updated January 2024

### Introduction

Straker Limited (Straker, we, our or us) is a global company that provides translation and localisation services. Straker is committed to security and privacy of personal information that is entrusted to us.

Straker obtains personal information about you from various sources. This Privacy Policy covers the collection, use and disclosure of personal information collected through this website [www.strakertranslations.com](http://www.strakertranslations.com) including subdomains and other websites operated by Straker, its affiliates and subsidiaries (known collectively as Sites), and the services offered through the Sites and through Straker's deltaRay platform (separately and collectively known as Services). You may be a visitor to one of our Sites (Visitor), supplying us with your products or services or looking to enter into a supply arrangement with us (Supplier), a user of one or more of our Services (Customer), a direct or indirect customer of a Straker's Customer (User).

This Privacy Policy applies to Straker's Sites and Services and to individuals who interact with Straker including customers of the following products:

- Straker Validation for Word;
- Straker LanguageCloud;
- Straker Translate for Slack;
- Straker Translate for Microsoft Teams;
- Straker Enterprise (formerly Lingotek); and
- Straker Workbench DeltaRay.

WEBSITES, PRODUCTS AND SERVICES OF THIRD PARTIES ARE SUBJECT TO THEIR OWN SEPARATE PRIVACY POLICIES. The use of information collected through our Sites or Services shall be limited to the purpose of providing the service for which you have engaged us.

We are committed to processing personal information consistent with the requirements of all applicable laws. As we currently operate across multiple jurisdictions, each with slightly different privacy requirements, we have included sections at the end of this Privacy Policy outlining any specific variations.

We do not sell your information to third parties under any circumstances.

You may choose not to supply us with your personal information, but this may impact on our ability to provide you with our Services, or to have meaningful interactions with you.

By using our Sites and Services, you consent to the data practices described in this Privacy Policy. This Privacy Policy needs to be read in conjunction with Straker's Terms and Conditions. If you have any questions on this Privacy Policy, please contact our Data Privacy Officer on [dataprivacy@strakergroup.com](mailto:dataprivacy@strakergroup.com)

## 1. Personal Information we collect

The kinds of personal information we collect and hold about you will depend on our relationship with you, our Sites, and the Services we provide to a Visitor, a Supplier, a Customer or a User.

### 1.1 Definition of Personal information

Personal Information means information about an identifiable natural person. This could include your name, date of birth, email address, telephone number, bank account details, payment information, support queries and other identifiable information. If you can't be identified (for example, when Personal Information has been de-identified or aggregated) then this Privacy Policy doesn't apply to you.

We collect personal information in a variety of ways. Unless it is unreasonable or impracticable to do so, we collect your personal information from you directly. In many cases however, we will collect information about you from a third party, including Customers.

### 1.2 Straker collects Personal Information:

- a) When you request a Quote from our Sites, you will provide us with your contact details, such as name, telephone number, email address and details of the country that you are from.
- b) When you fill-in our online form to contact our expert team or for a general enquiry, we ask for your name, telephone number, email address, country, and other information about your interest in our Services.
- c) When you respond to Straker emails or surveys, we collect your email address, name and any other information you choose to include in the body of your email or responses.
- d) If you contact us by phone, we may collect the phone number you use to call Straker, as well as other information you may provide during the call.

- e) When you supply goods or services to us.
- f) When you visit our Sites.  
When you are a User. Please note that as a User, your agreement is with the Customer. The Customer should explain to you how it shares your personal information with Straker. If you have questions about this sharing, then you should direct those questions to the Customer. As a service provider, we act solely as a data processor on behalf of our Customers. We do not assume responsibility for how our Customers manage the personal data of their own clients or individuals that they share with us. Our role is strictly limited to processing and storing the data in accordance with the instructions provided by our Customers. Our Customers, as data controllers, are responsible for ensuring that they have the necessary legal basis and compliance with applicable data protection laws for the collection, use, and disclosure of personal data they share with us. We are committed to implementing appropriate technical and organizational measures to protect the security and confidentiality of the data entrusted to us, as outlined in our security practices. However, any issues or concerns regarding the collection, use, or disclosure of personal data by our Customers should be addressed directly to them, as they are solely responsible for their own data management practices.

## **2. Information that we collect automatically on our Sites**

- 2.1 We may offer interactive features such as chat or messaging services on the box, forums, and social media pages. We, and other individuals who use these interactive features, may collect the information that is submitted or made available through such features. Any information shared on the public forums or social media pages may be seen by anyone, including third parties that do not adhere to our Privacy Policy.
- 2.2 We may also use 'Cookies' or other similar tracking technologies on our websites and services that help us track your use of the websites and services and remember your preferences. Cookies are small files that store information on your computer, mobile phone or other device. They enable the entity that puts the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You may be able to disable Cookies through your internet browser but allowing us to collect Cookies ensures that the Sites works as intended.
- 2.3 Web Beacons (also known as Web bugs, pixel tags or clear GIFs) are tiny graphics with a unique identifier that Straker includes on its Sites, including to deliver or communicate with Cookies, to track and measure the performance of those features, and to monitor how many visitors use those features.

We may also include Web Beacons in emails to understand whether messages have been opened, acted on, or forwarded.

- 2.4 Browser and device data, such as IP Address, device type, operating system and Internet browser type, screen resolution, operating system name and version, device manufacturer and model, language, plug-ins, add-ons and the language version of the Sites you are visiting.
- 2.5 Usage data, such as time spent on the Sites, pages visited, links clicked, language preferences, and the pages that led or referred you to our Sites.
- 2.6 We collect information about your online activities on websites and connected devices over time and across third-party websites, devices, apps and other online services.

### **3. Information a Customer may give us**

- 3.1 If you are a Customer, and you want to share or otherwise allow Straker to collect, create and use personal information related to Users, you must:
  - a) obtain permission from Users to allow Straker to do this; and
  - b) take reasonable steps to ensure that Users understand what Personal Information we will collect, create and use and that they agree to this. For example, you can do this by providing Users with a copy of this Privacy Policy and ensuring your own privacy policies include a detailed explanation of what personal information is going to be collected by Straker, who will have access to it and how Straker and you intend to use this personal information.
- 3.2 As a Customer, you decide who will have access to the Services you acquire from us, including Personal Information we collect from your authorised Users. You need to advise us who these authorised persons are. We will need to collect their name and contact information from you. Please make sure you have this person's consent before you share their information with us.
- 3.3 Information collected for Services via Straker's deltaRay platform may include a third party's personally identifiable information, collected and processed under the direction of the Customer, who are the controllers of that data. We have no ownership of information of individuals whose personally identifiable information may be processed as part of the use of our services.
- 3.4 A User who seeks access to their data, seeks to correct, amend or delete inaccurate data or wishes to opt-out of or remove Personal Information provided by a Customer, should direct his/her query to the

Customer (where the Customer is acting in its capacity as data controller).

3.5 Please refer to clause 17 if the User wants to Opt-out of sharing its Personal Information with third parties.

#### **4. Information we create to manage a Customer account**

4.1 We create and hold information to manage your account, including:

- a) a quote number and account name;
- b) information on the Services that you have agreed to purchase from us, and information on any Services you have used to purchase from us;
- c) your billing information and payment records; and
- d) any login and password that we may assign to our Customers for use with the provision of our Services.

#### **6 How we use Personal Information**

4.2 When we collect Personal Information, in connection with Services, we may collect and store Personal Information of Users, solely to assist our Customers. We do not use this personal information for our own purposes.

4.3 If you submit Personal Information to us through the Sites, we may use your Personal Information to improve our services to you, to contact you and to identify and authenticate your access to the Services that you are authorized to access.

4.4 We may also use your email address to send updates, a newsletter or news regarding our Services. You may choose not to receive email (Opt-Out) of this nature by clicking a link in the newsletter. Please note that the email must come from the email account you wish to block.

4.5 We may use your Personal Information to secure and protect our systems and platforms on Sites. This includes managing, improving and monitoring their operation, security and integrity. It also includes preventing attacks against, and threats to, their security or integrity.

4.6 Straker may transfer Personal Information to other companies that help us provide our Services (including third party sub-contractors). Transfers to these third parties are covered by the provisions

of this Privacy Policy in the service and employment agreements (as appropriate) entered into between Straker and the Customer. Please refer to point 6 (below).

## 7 How we disclose Personal Information?

While we endeavour to limit what personal information we disclose and to whom, in certain circumstances we may share or disclose your personal information to other entities for the purposes listed below. What information we share and why depends on a specific situation. For example, we may share your personal information with:

### 7.1 Suppliers

We may engage third-party Suppliers to work with us to administer and provide our products and services to Customers. For example, we work with reliable cloud data centre suppliers to store personal information and other data we collect. We also work with payment card industry (PCI) compliant service providers to assist with processing of credit card payments. Please refer to clause 17 of this Privacy Policy should you wish to Opt-out of us sharing your Personal Information with third parties.

### 7.2 Customers

We use Personal information of Users provided to us by Customers, to perform contractual obligations under the contracts that we have with Customers.

### 7.3 Regulatory Authorities

We may disclose your Personal Information or any information you submitted via Sites and/or Services if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to:

- a) comply with any applicable law, regulation, legal process or governmental request;
- b) enforce our Terms of Use including investigations of potential violations thereof;
- c) detect, prevent, or otherwise address fraud or security issues; or
- d) protect against harm to the rights, property or safety of Straker, Users, Customers, yourself or the public.

### 7.4 Straker's affiliates

To ensure we can operate effectively and provide you with the best user experience, we may share

information about you with other parts of Straker Limited and companies within the Straker group.

#### 7.5 [A third party in the event of a change in control of Straker](#)

If we sell or otherwise transfer part or the whole of (or control of) Straker or our business to another organisation (including in the course of a transaction like a sale, merger or acquisition or as part of a dissolution, liquidation, administration, receivership or other form of insolvency), you agree that your Personal Information that is collected by Straker may be disclosed to a third party, prospective buyer, transferee or insolvency practitioner, and that this is reasonable to enable that party to continue or manage the business.

### 8 [Overseas Processing](#)

Where we disclose your personal information to third parties, those third parties may store, transfer or access personal information outside of New Zealand, which may not have an equivalent level of data protection laws as those in New Zealand. Before disclosing any personal information to an overseas recipient, we will comply with Information Privacy Principle 12 and only disclose the information if:

- you have authorised the disclosure after we expressly informed you that the overseas recipient may not be required to protect the personal information in a way that, overall, provides comparable safeguards to those in the Privacy Act 2020;
- we believe the overseas recipient is subject to the Privacy Act 2020;
- we believe that the overseas recipient is subject to privacy laws that, overall, provide comparable safeguards to those in the Privacy Act 2020;
- we believe that the overseas recipient is a participant in a prescribed binding scheme;
- we believe that the overseas recipient is subject to privacy laws in a prescribed country; or
- we otherwise believe that the overseas recipient is required to protect your personal information in a way that, overall, provides comparable safeguards to those in the Privacy Act 2020 (for example pursuant to a data transfer agreement entered into between us and the overseas recipient).

### 9 [Security and Retention](#)

9.1 We make reasonable efforts to provide a level of security appropriate to the risk associated with the processing of Personal Information. We maintain organizational, technical and administrative measures designed to protect Personal Information covered by this Privacy Policy against unauthorized access, destruction, loss, alteration or misuse.

9.2 Secure Industry-Recognized Controls:

To protect the privacy of any personal information you may have provided, Straker employs industry-standard controls including physical access controls and internet firewalls.

We are certified to ISO17100 certification standards, which is the highest global quality standard for translation services. As appropriate, and to comply with this certification, when our client purchases a ISO17100 certified translation, our document relay systems, internal processes and professional translators are stringently tested and evaluated.

9.3 We also keep Personal Information to comply with our tax, accounting, and financial reporting obligations, where we are required to retain the data by our contractual commitments to our financial partners, and where data retention is mandated by the payment methods you used. We may also keep it to assist with our fraud monitoring, detection and prevention activities. In all cases where we keep data, we do so in accordance with any limitation periods and records retention obligations that are imposed by applicable law.

9.4 Archiving and Previous Translations:

Our system automatically archives all material relating to Services for two years after the job status is set to 'Completed', is then securely destroyed after this two-year period after this time.

## 10 [Links To Other Online Services](#)

10.1 The Sites may provide the ability to connect to other online services. These online services may operate independently from us and/or may have their own privacy notices or policies, which we strongly suggest you review.

10.2 If any online service linked to our Sites not owned or controlled by us or does not claim to be covered by this Privacy Policy, we are not responsible for it and/or it is not covered by this Privacy Policy. Please refer to the privacy policy associated with that online service.

## 11 [Accessing and correcting your personal information](#)

11.1 You have a right to request access to, or the correction of, your personal information that we hold about you, subject to exceptions allowed by law. You may be required to put your request in writing for security reasons. If you are a User, we may require that you direct your request to the relevant Customer.

11.2 Straker will give you access to, or correct, your Personal Information unless there is a lawful reason



for refusing your request for access or correction.

- 11.3 If we refuse your request we will give you a written notice explaining our reasons for that refusal and how you may complain about that refusal.

## 12 Your data protection rights

Depending on your location and subject to applicable law, you may have the following rights with regard to the Personal Information we control about you:

- a) The right to request confirmation of whether Straker processes Personal Information relating to you, and if so, to request a copy of that Personal Information;
- b) The right to request that Straker rectifies or updates your Personal Information that is inaccurate, incomplete or outdated;
- c) The right to request that Straker erase your Personal Information in certain circumstances provided by law;
- d) The right to request that Straker restrict the use of your Personal Information in certain circumstances, such as while Straker considers another request that you have submitted (including a request that Straker make an update to your Personal Information);
- e) The right to request that we export your Personal Information that we hold to another company, where technically feasible;
- f) Where the processing of your Personal Information is based on your previously given consent, you have the right to withdraw your consent at any time; and/or
- g) In some cases, you may also have the right to object to the processing of your Personal Information. Please refer to clause 16 to opt out of sharing your Personal Information with third parties.

Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect

our ability to do business with you.

## 13 Process for exercising data protection rights

- 13.1 We will comply with your request to the extent required by applicable law. We will not be able to respond to a request if we no longer hold your Personal Information. If you feel that you have not received a satisfactory response from us, you may have the right under applicable laws to consult with the data protection authority in your country.
- 13.2 For your protection, we may need to verify your identity before responding to your request, such as verifying that the email address from which you send the request matches your email address that we have on file.
- 13.3 If we no longer need to process Personal Information about you in order to provide our Services, we will not maintain, acquire or process additional information in order to identify you for the purpose of responding to your request.
- 13.4 We remind you again that if you are a User, please direct your requests directly to the Customer.
- 13.5 Refer to clause 17 (below) on what you need to do to opt-out of sharing your Personal Information with a third party.

## 14 The complaints process

If you think we have breached the relevant privacy legislation or regulations, or you wish to make a complaint about the way we have handled your personal information, you can contact us using the details set out below.

Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period setting out the outcome of our investigation and the steps we will take in response to your complaint.

If you are not satisfied with our response, you may contact the Office of the New Zealand Privacy Commissioner (if you are a New Zealand resident).

### 14.1 Australia

#### 14.1.1 Employee information

If you are based in Australia, this Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act 1988.

#### 14.1.2 Disclosure of personal information outside Australia

- a) Straker values the safety of your information, so we store all data collected from New Zealand and Australian Customers servers located with Amazon Web Services in Australia. However, we may transfer personal information outside of Australia to other countries, including the United States, as necessary to operate our business.
- b) We will take reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles set out in the Privacy Act 1988.
- c) If you are an Australian resident, and you are dissatisfied with our handling of any complaint you raise under this Privacy Policy, you may wish to contact the [Office of the Australian Information Commissioner](#).

#### 14.2 EEA

Please refer to Straker's policy relating to the [General Data Protection Regulation \(GDPR\)](#).

If you are a resident of the EEA and believe that we process your information within the scope of the General Data Protection Regulation (GDPR), you may direct your questions or complaints to the [Data Protection Commissioner](#).

If you are a resident of the UK, you may direct your questions or concerns to the [UK Information Commissioner's Office](#).

If you have any questions or complaints about this Privacy Policy, please contact our Data Privacy Officer (see point 14 below).

#### 14.3 United States – California & Nevada

14.3.1 If you are a consumer located in California or Nevada, we process your Personal Information in accordance with the California Consumer Privacy Act (CCPA). This section provides additional details

about the personal information we collect and use for purposes of CCPA.

14.3.2 We do not knowingly collect the Personal information of consumers, as defined in the California Consumer Privacy Act (CCPA). As a “Service Provider” under CCPA, we may come into possession of consumer Personal information and will treat such data in accordance with the CCPA to the extent we are required to do so.

#### 14.3.3 Your California Privacy Data Subject Rights

If you are a California resident who is considered a “consumer” in your dealings with us and to the extent CCPA or its successor legislation and regulations apply to us, you may have certain rights. California law may permit you to request that we:

- a) Provide you the categories of personal information we have collected or disclosed about you in the last twelve months; the categories of sources of such information; the business or commercial purpose for collecting or selling your personal information; and the categories of third parties with whom we shared personal information.
- b) Provide access to and/or a copy of certain information we hold about you.
- c) Delete certain information we have about you.

You may have the right to receive information about the financial incentives that we offer to you (if any). You also have the right to not be discriminated against (as provided for in applicable law) for exercising certain of your rights. Certain information may be exempt from such requests under applicable law. For example, we need certain types of information so that we can provide the Services to you and for compliance with applicable law. If you ask us to delete certain information, you may no longer be able to access or use the Services.

#### 14.3.4 How We Collect, Use, and Disclose your Personal Information

The Personal Information We Collect (refer to point 1 above) section describes the personal information we may have collected about you, including the categories of sources of that information. We collect this information for the purposes described in the How We Use Personal Information (refer to point 5 above) section. We share this information as described in the How We Disclose Personal Information section (refer to point 6 above). Straker uses cookies, including advertising cookies, as described in our Cookie Policy.

#### 14.3.5 Your CCPA Rights and Choices

As a California consumer and subject to certain limitations under the CCPA, you have choices regarding our use and disclosure of your personal information:

- a) Exercising the right to know: You may request the following information about the personal information we have collected about you:
  - the categories and specific pieces of personal information we have collected about you;
  - the categories of sources from which we collected the personal information;
  - the business or commercial purpose for which we collected the personal information;
  - the categories of third parties with whom we shared the personal information; and
  - the categories of personal information about you that we disclosed for a business purpose, and the categories of third parties to whom we disclosed that information for a business purpose.
- b) Exercising the right to delete: You may request that we delete the personal information we have collected from you, subject to certain limitations under applicable law.
- c) Exercising the right to opt-out from a sale: Straker does not sell Personal Information.
- d) Non-discrimination: The CCPA provides that you may not be discriminated against for exercising these rights. To submit a request to exercise any of the rights described above, contact our Data Protection Officer as set out in point 15 below.

#### 14.4 Rest of the World

When exercising your rights, we may need to verify your identity before responding to your request, such as verifying that the email address from which you send the request matches your email address that we have on file. Authentication based on a government-issued and valid identification document may be required. If you are a User, please direct your requests directly to the customer with whom you shared your personal information.

### 15 Updates to our Privacy Policy

As things change, and technology changes, we may need to update our Privacy Policy from time to time. We'll keep you updated by publishing these changes on our websites. You may want to check back here from time to time to make sure you're always up to date with our Privacy Policy. If we make material changes to the Policy, where possible we will notify you as required by

applicable laws.

We will also update the “Last Updated” date above to indicate when those changes go into effect.

## 16 Contact Information

For more information on our current Privacy Policy, you may wish to contact us directly on [dataprivacy@strakergroup.com](mailto:dataprivacy@strakergroup.com)

If you believe that the privacy of your personal information has not been respected, you may submit a complaint in writing to the attention of Data Privacy Officer on [dataprivacy@strakergroup.com](mailto:dataprivacy@strakergroup.com), via mail attention of Data Privacy Officer Manager at our corporate headquarters in PO Box 305110, Triton Plaza, Albany, North Shore City 0757, New Zealand.

## 17 Opt-out Clause (Sharing of Personal Information with third parties)

- a) This clause applies to Visitors, Suppliers, and Customers. We respect your rights and understand your preferences regarding the collection and sharing of your PII. If you do not wish for your PII to be shared with data processors, you have the right to Opt-out. By exercising this right, you request that we do not disclose your PII to any data processor for data processing purposes.
- b) If you are a User, and wish to exercise this right, please contact the Customer directly. Please inform the Customer of your request, and it will be their responsibility to assess the request and take appropriate action in accordance with applicable data protection laws, including contacting us and advising us that you wish to Opt-out from any sharing of your Personal Information with third parties. We will assist Customers as necessary to fulfil their obligations regarding your request.
- c) To exercise your Opt-out right, please contact our designated Data Privacy Officer at [dataprivacy@strakergroup.com](mailto:dataprivacy@strakergroup.com) and provide your request in writing. Upon receiving your Opt-out request, we will promptly cease sharing your PII with any data processors, unless required by law or as necessary to fulfil our legal obligations.
- d) Please note that opting out of data sharing with data processors may limit certain services or functionalities we can provide to you, as such sharing may be essential for the provision of certain services or the performance of specific contractual obligations.



- e) It is important to know that by opting out under this clause, you acknowledge and understand that we will continue to collect, use, and process your PII as per our Privacy Policy, except for sharing with data processors as defined under the GDPR.