

# Johnston Text & Training

## Privacy Notice

Trust is the basis for any good business relationship, and a conscientious respect for privacy is an explicit component of such a relationship. In this Privacy Notice—drafted in connection with the General Data Protection Regulation (GDPR)—we indicate which types of personal data we gather and store, how we obtain that, what we do with it and how long we keep it. We also discuss how we deal with the confidentiality of any texts you send us.

### **In short**

The website of Johnston Text & Training ([www.johnston.nl](http://www.johnston.nl)) is solely informative. Visitors to the site have no opportunity to interact with the content, nor are they able to leave behind any personal data. The site makes no use of cookies. In short, we do not collect or store any personal data about our visitors on our website.

When (potential) clients contact Johnston Text & Training in connection with a possible assignment, we do take note of their name, email address and/or telephone number. When invoicing completed assignments, we add the client's post address to our invoice as required by the Dutch tax authorities. Foreign clients based in the EU may also be required to supply their VAT number prior to invoicing. None of the personal data we collect and store is ever shared with third parties unless we are legally required to do so.

In connection with translation and/or editing assignments and training programs, clients normally send texts via email to Johnston Text & Training. Any and all texts we receive are treated as strictly confidential. We never share anything of the content of such texts with third parties. Upon request, any texts the client exchanges with Johnston Text & Training can also be encrypted for added security.

### **Who are we and how can you contact us?**

Johnston Text & Training, based in Amsterdam (1073 CD 246B), is responsible for the collection and safekeeping of personal data as described in this Privacy Notice. If you have questions or concerns about your personal data or our policy in that regard, or if you wish to file a complaint, please use the following email address or telephone number to contact us:

#### **Contact details:**

- E-mail: [info@johnston.nl](mailto:info@johnston.nl)
- Telephone: +31628737536
- Site: <https://www.johnston.nl>
- Data controller: Tom Johnston

### **What kinds of personal data do we collect and store?**

Johnston Text & Training collects the limited amount of general personal data that (potential) clients provide us with when they inquire about and/or make use of our services. We collect the following types of information:

- First and last name of contact person(s)
- Telephone number of contact person(s)
- E-mail address of contact person(s)
- Postal address of client, as required for invoicing
- VAT number of client outside of the Netherlands (if applicable), as required for invoicing

Please note that *Johnston Text & Training* does not collect any kind of sensitive or special-category personal data (including information relating to a client's race, ethnic background, religious preference, age, gender or sexual preference).

### **For what purposes do we collect and store personal data?**

Johnston Text & Training collects and stores your personal data exclusively for the following purposes:

- To be able to call or email you if necessary in order to effectively carry out an assignment (e.g. to discuss the objectives and set dates for a training program or to consult with the author to finetune a translation prior to delivery)
- To be able to deliver the services you require (e.g. translated or edited texts)
- To send you quotes and/or invoices
- To comply with legal regulations (including tax legislation).

### **Do we use automated decision-making and/or profiling?**

Johnston Text & Training uses no computer programs or systems for the automatic collection, storage or processing of personal data. We make no use of automated decision-making and/or profiling.

### **Do we use cookies or comparable tracking technology?**

The website of Johnston Text & Training ([www.johnston.nl](http://www.johnston.nl)) is read-only. This means that visitors cannot log in, nor can they leave any comments on this site. As a consequence, no cookies, tracking software or similar technologies are created or stored on a visitor's computer.

### **How do we safeguard your personal data?**

Johnston Text & Training treats the protection of your personal data as a serious matter, taking appropriate measures to prevent any misuse of or unauthorized access to that information. If you have the idea that your personal data is not safe or if you have indications that your personal data is being used inappropriately, please contact us via [info@johnston.nl](mailto:info@johnston.nl).

### **How long do we keep your personal data?**

Johnston Text & Training does not store your personal data any longer than is strictly necessary to achieve the objectives for which they are collected as outlined above. In connection with Dutch tax laws we are legally obliged to store the types of data mentioned above for no fewer than seven years.

### **Do we share your personal data with others?**

Johnston Text & Training will never share any of your personal data with any third party unless that is necessary in order to carry out your assignment (and thus with your consent) or in order to comply with a legal obligation (e.g. tax legislation).

### **What are your rights in relation to your personal data?**

You have the right to gain access to whatever personal data of yours that Johnston Text & Training has collected and stored, to rectify it, or to have it deleted. In addition, to the extent that we are not legally required to keep your personal data, you have the right to withdraw your consent to its use or storage by Johnston Text & Training. You can send a request for access to or for the correction or deletion of your personal data or an objection to or withdrawal of your consent for our storage of your personal data to [info@johnston.nl](mailto:info@johnston.nl).

To ensure that no one but you can request access to your personal data, we require that you send us a copy of your legal identity document (passport) along with your request. To protect your privacy, please take care to black out the following items on that copy:

- your passport photo
- the machine-readable zone (MRZ, the strip of numbers at the base of the passport)
- your passport number
- your citizen service number (BSN)

We will respond to your request as soon as possible and in any case within four weeks.

Johnston Text & Training would also like to remind you of the possibility to lodge a complaint with the national supervisory authority, the Personal Data Authority. You can do that by way of the following link: <https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>.

### **How do we deal with confidentiality of any text material you send us?**

Any and all textual material that you send Johnston Text & Training in connection with an assignment will be treated as strictly confidential. Texts that are entrusted to Johnston Text & Training for edited or translation or in connection with training purposes will never be shared with third parties. Please note that if Johnston Text & Training gives a workshop or training program at your company on behalf of another training company, texts written by the participants in the workshop may be sent via that other training company.

Upon request, especially sensitive documents can be exchanged between the client and Johnston Text & Training using password-protected encryption.

Texts that clients send Johnston Text & Training to be translated or edited are generally stored for reference purposes in case of subsequent assignments from the same client (e.g. to ensure consistency in the use of certain terms or concepts for that client). Likewise, texts submitted by participants in a training program are generally stored as sources of examples to be discussed in possible similar workshops for the same client. At the client's request Johnston Text & Training will permanently delete specific texts immediately upon completion of the assignment.