

Lionbridge Community Data Privacy Notice

Lionbridge is committed to protecting your privacy by maintaining the integrity and confidentiality of the personal data we collect from you in the context of our recruitment and application process and the fulfillment of your contractual relationship with us as a member of our Community of translators, raters, testers and interpreters. This Privacy Notice describes how we, as controllers of your personal data, collect and process your personal data, including how we may use this personal data in the recruitment and application process and, if you are engaged to provide services to us, in connection with that contractual relationship (the "Purpose").

The term "Lionbridge" (or "we" or "us") means Lionbridge Technologies, Inc. and Lionbridge Group Company. The term "Lionbridge Europe Group Company" means any EU and EEA Lionbridge entity contained in Appendix 1 to this Notice. The term "Lionbridge Group Company" means any subsidiary of Lionbridge Technologies, Inc.

This notice applies to every contractor of each Lionbridge Europe Group Company and, where applicable, other classes of workers.

Types of Personal Data We Collect

As part of our recruitment and application process and, if you elect to become a member of our Community by agreeing to a services contract with us, we may collect certain personal data and special categories of personal data as listed below, and any other identifying data as may be required for the purposes set out in this Privacy Notice.

IMPORTANT: Please note that the below list of personal data we may collect about you for the Purpose is more fully detailed in "Legal Bases and Purposes of Processing" below. This list is intended to be as complete and accurate as reasonably possible, but it is not exhaustive and may be updated from time to time in the manner described in "Updates to our Privacy Notice".

<ul style="list-style-type: none">● Background and Contact Data
<ul style="list-style-type: none">● Nationality● Education● Employment History● Gender● Government ID● Home Address, including Street, District, City, Postal Code and County● Home Telephone Number and Mobile Number● Personal Email Address● IP Address

Contract Data
<ul style="list-style-type: none"> • Contract Service Date (including contract status changes) • Tax Information • Contract Service Rates • Bank Information • Performance Management Records • Records of Assessments at Lionbridge • Local Community Member ID • Site Location • Service Types Offered • Technical Competencies • Association Memberships • Language Competencies • Subject Matter expertise (including education and related credentials) • First and Last Name (in English and local language) • Mobile Number • Any Additional Information Voluntarily Provided
Security and Access Control Data
<ul style="list-style-type: none"> • Date, times and location of access to the internet/online services using Lionbridge devices or through the Lionbridge systems (where appropriate) • Swipe Card Records (where appropriate) • CCTV Footage (where appropriate) • Lionbridge Systems Communications (where appropriate)
Special Categories of Personal Data
<ul style="list-style-type: none"> • None

Legal Bases and Purposes for Processing your Personal Data

We will process your personal data for the following purposes and on the following lawful bases:

Legal Basis	Purposes
<p data-bbox="201 375 797 411"><i>Entering into or Performance of a Contract</i></p> <p data-bbox="201 411 797 762">It is necessary to process your personal data in order to enter into and perform our obligations under our recruitment and application process and the fulfillment of a contractual relationship with us. We therefore rely on this legal basis to collect and otherwise use your personal data to enable us to perform our part of our contract with you and our obligations to third parties, and to ensure that you are properly fulfilling your obligations to us.</p> <p data-bbox="201 804 797 974">IMPORTANT: In the event that you do not wish to provide us with your personal data for these above purposes, we will not be able to offer our recruitment and application process and the fulfillment of a contractual relationship with us.</p>	<ul data-bbox="870 375 1421 1226" style="list-style-type: none"><li data-bbox="870 375 1421 478">• to carry out obligations under services contracts and in connection with other working relationships or arrangements<li data-bbox="870 478 1421 581">• for communications including surveys, evaluation, feedback, instructions, security and training<li data-bbox="870 581 1421 653">• to manage and operate our company, its functions and activities<li data-bbox="870 653 1421 688">• determining contractual payment<li data-bbox="870 688 1421 762">• managing the contract termination process<li data-bbox="870 762 1421 1161">• to access and use Lionbridge’s global technology network, if applicable to the services for other general purposes including to ensure the smooth and efficient running of the recruitment, application and potential or actual contractual relationship with you (including all of the activities that need to be undertaken before, during and after a contractual relationship)<li data-bbox="870 1161 1421 1226">• to manage contractual performance of services

<p>Legitimate Interests We process your personal data on the basis that the processing is necessary for the legitimate interests of Lionbridge, including those related to performance of contractual or legal obligations, and does not unduly affect your interests or fundamental rights and freedoms.</p> <p>It is necessary for the purposes of the legitimate interests of Lionbridge (set out in the column to the right) to process your personal data.</p> <p>IMPORTANT: Before we process your personal data to pursue our legitimate interests for these purposes, we determine if such processing is necessary, and we carefully consider the impact of our processing activities on your fundamental rights and freedoms. On balance, we have determined that such processing is necessary for our legitimate interests and that the processing which we conduct does not adversely impact on these rights and freedoms.</p>	<ul style="list-style-type: none"> • to meet customer obligations regarding the skills, expertise and background of our personnel who may be performing work for their benefit • to maintain a global database of personnel • to efficiently manage and administer the recruitment, application and contractual relationship process across the Lionbridge group • to prevent fraud or criminal activity, misuses of our services as well as the security of our technology systems, architecture and networks, and the security of our premises, including by conducting background checks (where appropriate or required by our customers) • to provide for a centralized, global approach to the provision of technology services to our employees, suppliers and contractors, and enable employees, suppliers and contractors to interact with one another. This normally involves the hosting of your contact and e-mail information. • to meet our corporate and social responsibility objectives • to investigate allegations of misconduct in which you are involved
<p>Compliance with a Legal Obligation It is necessary to process your personal data to comply with our legal and regulatory obligations.</p>	<ul style="list-style-type: none"> • to comply with our legal and regulatory obligations, such as tax reporting
<p>Assessment of Work Capacity It is necessary for us to collect and process your personal data (including special categories of personal data) in order to assess your services capacity.</p>	<ul style="list-style-type: none"> • to assess your services capacity
<p>Defend, Establish or be a Party to Legal Claims It might be necessary to process your personal data in order for us to establish, investigate, exercise or defend legal claim to which you are a party.</p>	<ul style="list-style-type: none"> • to file legal proceedings • to investigate, establish, exercise or defend a legal claim • to settle legal claims

Parties with whom we Share your Personal Data

By disclosing your personal data as part of our recruitment and application process and the fulfillment of a contractual relationship with Lionbridge, you acknowledge that your personal data may be shared among Lionbridge Group Companies and outside the Lionbridge Group Companies with third parties, including the customer who is the beneficiary of the services you may perform (as described below):

Recipient
Lionbridge Group Company <ul style="list-style-type: none">• Authorized Lionbridge Technologies, Inc. and other Lionbridge Group Company's Corporate and subsidiary Community Management, Operations and Finance personnel
Third Party Service Providers <ul style="list-style-type: none">• Financial Institutions• Network Providers• Service Provider Systems providing recruiting, reference checks, interview scheduling, application tracking, onboarding, payment and other services
Other Recipients <ul style="list-style-type: none">• Agents of Lionbridge• Prospective Buyers and Sellers of Lionbridge Assets (to facilitate the acquisition of Lionbridge or Lionbridge assets by a third party)• External Advisors (e.g. lawyers, bankers, owners, accountants and auditors and financial institutions and service providers as necessary to protect Lionbridge legitimate and legal interests)• Regulatory Authorities and Law Enforcement Agencies (where required pursuant to an applicable law, governmental or judicial order, law or regulation, or to protect the rights or property of Lionbridge)• Customers of Lionbridge (to facilitate the provision of services to customers)• Prospective customers of Lionbridge (to facilitate entering into a potential relationship with a prospective customer)

Please note that we will not disclose your data to any third party for the purposes of any direct marketing of products or services without your permission, or providing you with an opportunity to opt out of receiving the direct marketing.

International Data Transfers

(a) Transfers of your Personal Data

As a global company, Lionbridge has implemented global privacy practices for processing personal data protected under various data protection laws. Lionbridge stores the personal data in countries outside the European Economic Area ("EEA") (including for example the United States) that are not deemed to provide the same level of protection for personal data as required in the EEA. For example, your information may be accessed by Lionbridge Technologies, Inc. and/or by Community Management, Operations, or Finance personnel located at a subsidiary of Lionbridge Technologies, Inc. in a country different from where you are located. *As described in clause (b) below, Lionbridge has put in place appropriate safeguards to ensure that we transfer, process and store your personal data outside of the EEA in accordance with the requirements of the EU Commission and the GDPR.*

(b) Appropriate Safeguards

We only transfer your personal data outside the EEA where the EU Commission has decided that the third country in question ensures an adequate level of protection in line with EU data protection standards or there are appropriate safeguards in place to protect your personal data. For cross border transfers from the EEA and Switzerland to a third country, we use the following adequate safeguards which are approved by the EU Commission:

- We have entered into standard contractual clauses (SCC) as approved (and without amendment) by the European Union Commission; and
- We have certified to Privacy Shield.

If you would like to find out more about the appropriate safeguards that we have in place to govern the transfer of your personal data, (i) if you have a Lionbridge e-mail address, then you can contact us by going to the Lionbridge support portal at <https://lionbridge-it.zendesk.com/hc/en-us> locating the GDPR offering and submitting your request, and (ii) if you do not have a Lionbridge e-mail address, then you can contact us at data-privacy@lionbridge.com.

Storing and Protection of Your Personal Data

As an applicant of a Lionbridge Europe Group Company, or you have a contractual relationship with a Lionbridge Europe Group Company, your personal data is stored in a centralized database information system and/or other systems that are hosted on a secure server located in the United States. We and/or our third-party service providers will process, view and maintain your personal data in the United States. We have entered into appropriate terms of service with our third-party service providers which restrict access to personal data while stored in the United States.

We use commercially reasonable organizational, technical and administrative procedures to protect against unauthorized or unlawful access, processing, disclosure, alteration, destruction or accidental loss of your personal data.

We collect, process and maintain your personal data in accordance with the practices described in this Privacy Notice, applicable Lionbridge policies and applicable local legal and regulatory requirements.

Retention of Your Personal Data

We limit access to and use of your personal data to authorized persons. We will retain your personal data as long as needed to fulfill the purposes as described in this Privacy Notice and in accordance with Lionbridge records retention policies and local laws and regulations. When your personal data is no longer needed, we will securely destroy it.

Please note that in certain circumstances, we may be required to hold your data for a longer period, for example, if we are processing an ongoing claim or believe in good faith that the law or a relevant regulator may reasonably in our view expect or require us to preserve your data.

Your Rights in Relation to your Personal Data

We rely on you to provide accurate, complete and current personal data to us. The following table sets out your rights which you have to address any concerns or queries with us about the processing of your personal data. Please note that these rights are not absolute and are subject to certain exemptions under applicable data protection law.

Right of Access:	You are entitled to ascertain what type of personal data Lionbridge holds about you and what we do with that information. You are also entitled to receive a copy of this information.
Right to Rectification:	You have a right to have any inaccurate personal data which we hold about you updated or corrected.
Right to Restrict Use:	You have a right to stop Lionbridge from using your personal data in certain cases, including if you believe that the personal data we hold about you is inaccurate or our use of your information is unlawful. If you validly exercise this right, we will store your personal information and will not carry out any other processing until the issue is resolved.
Right to Object:	Where we rely on legitimate interest to use your personal data, you have a right to object to this use. We will desist from processing your personal data unless we can demonstrate an overriding legitimate grounds for the continued processing of your personal data.
Right to Erasure:	In certain circumstances, you may also have your personal data deleted, for example if you exercise your right to object (see above) and Lionbridge does not have any overriding reason to process your personal data or if Lionbridge no longer requires your personal data for the purposes set out in this notice.
Right to Data Portability:	If we are processing your personal data in order to perform your contract of services or if we are relying on consent to process your personal data, you may request us to provide you with your personal data which you have given us in a structured, commonly used and machine-readable format and you may request us to transmit your personal data directly to another controller where this is technically feasible.
Right to Object to Automated Decision-Making	You have a right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. Lionbridge will not subject you to a decision based solely on automated processing, including profiling.

You can exercise any of these rights in respect of your personal data: (i) if you have a Lionbridge e-mail address, by going to the Lionbridge support portal at <https://lionbridge-it.zendesk.com/hc/en-us> locating the GDPR offering and submitting your request, and (ii) if you do not have a Lionbridge e-mail address, then by contacting us at data-privacy@lionbridge.com.

Lionbridge will honor your requests to exercise these rights as required under applicable data protection rules and will usually, in response to a request, ask you to verify your identity and/or provide information that helps us to understand your request better. If we do not comply with your request, we will explain why.

If you are in the European Union, you also have the right to lodge a complaint with your supervisory authority if you are not satisfied with how we process your personal data.

Cookies and Other Data Tools

When you visit the Lionbridge website or the website of our third-party service providers, we or our third-party service providers may collect information through the use of cookies or other data analytic tools.

For more information on these tools and how we use the information collected, please see our Lionbridge Cookies Policy on Lionbridge.com located at <https://www.lionbridge.com/en-us/about/legal/privacy-policy>.

Updates to Our Privacy Notice

We may update, amend or remove this Privacy Notice from time to time. When we update or amend this Privacy Notice, we will also update the date at the bottom of this Privacy Notice. Only the current Privacy Notice is effective, so please review it periodically. When we materially update or amend this Privacy Notice, we will notify you by posting a notice of such changes on this page before they take effect.

Contact Lionbridge

If you have any questions or comments regarding this Privacy Notice or Lionbridge's privacy practices, or any concerns regarding a possible violation of this Privacy Notice, our practices or any applicable privacy law, (i) if you have a Lionbridge e-mail address, then you can contact us by going to the Lionbridge support portal at <https://lionbridge-it.zendesk.com/hc/en-us>, locating the GDPR offering and submitting your request, and (ii) if you do not have a Lionbridge e-mail address, then you can contact us at data-privacy@lionbridge.com.

Effective 25 May 2018

Reviewed 25 May 2023

Appendix 1

EU and EEA Lionbridge Entities

Geotext Translations Ltd

Lionbridge International Unlimited Company

Lionbridge Poland SP. ZO.O.

CLS Communication AG

CLS 4-Text GmbH

Lionbridge Denmark A/S

Lionbridge Global Software Limited

Lionbridge (Slovakia) SRO

Lionbridge Espana SLU

Lionbridge Technologies B.V.

Lionbridge Technologies France SARL

Lionbridge of Europe B.V.

Lionbridge France SAS

Lionbridge Nordic AB

Lionbridge Oy

Lionbridge Belgium BVBA

Lionbridge Deutschland GmbH

Lionbridge U.K. Limited

Anakan GmbH

Triom Production SARL

Exequo SAS