

## **Data Protection Declaration**

The [www.language-consulting.com](http://www.language-consulting.com) website is a joint offer by Merle & Sheppard Language Consulting Ltd and Merle & Sheppard Language Consulting GbR (referred to in combined form as: “Merle&Sheppard” or “We”). Merle & Sheppard Language Consulting GbR is responsible according to Art. 4 (7) EU General Data Protection Regulation (GDPR).

## **Legal Information**

### **1. General Information**

The security of your personal data is important to us. Therefore, we operate our web activities in accordance with the laws on data protection and data security. In the following text we inform you about which information we collect and how we use it.

When you access our website or retrieve a file, data about this process is stored in a log file on our web server. In particular, the following data is collected:

- IP address
- The domain name of the website you came from
- The websites you have visited in our offer
- The names of the files retrieved
- Date and time of your request
- The name of your Internet service provider
- Your PC operating system and browser version.

This information is needed for technical reasons in order to display our website to you, and to ensure its stability and security. The legal basis is provided in Article 6 (1) s. 1 lit. f of the GDPR.

### **2. IP addresses**

IP addresses are stored for a maximum period of 180 days. This data is stored for data security reasons in order to guarantee the stability and operational reliability of our system. We reserve the right to statistically evaluate anonymized data records.

### **3. Personal data / your rights**

Personal data is information that can be used to identify a person, i.e. information that can be traced back to a person. This includes the name, email address or telephone number.

You freely make your personal data available to us when registering, or making contact inquiries etc. We generally use your personal data to answer your inquiry, to process your order, or to provide you with access to special information or offers (e.g. ClientCentre). Your personal data will not be given to external third parties unless your inquiry or the service/product you have requested explicitly requires this. This will be communicated to you in the appropriate place.

The legal basis for the use of your data when answering your contact enquiries is Art. 6 (1) s. 1 lit. b GDPR.

We work with service providers who process certain data on our behalf. This is done exclusively in accordance with the respective applicable data protection law. In particular, on behalf of our service providers, we have concluded agreements on data processing that meet the legal requirements. Through careful selection and regular monitoring, we ensure that our service providers take all organisational and technical measures necessary to protect your data. The legal basis is provided in Art. 6 (1) s.1 lit. b GDPR.

We will immediately delete any data that is no longer needed, provided there are no legal retention periods to the contrary.

Should you use the functions of our Client Center, in addition to a contact inquiry, please note our supplementary "***Special data protection declaration for the ClientCentre***".

You have the following rights towards us with regard to personal data concerning your:

- right of access to information,
- right to rectification,
- right to erasure,
- right to restriction of processing,
- right to data portability,
- right to oppose the processing.

You also have the right to complain to a data protection supervisory authority about our processing of your personal data. You can contact the North Rhine-Westphalia State Commissioner for Data Protection and Freedom of Information by clicking on the following link: <https://www.lidi.nrw.de/>

If you have given your consent to the processing of your data, you can revoke this consent at any time with effect for the future. Such a withdrawal of consent influences the permissibility of processing your personal data after you have given it to us.

You may object to our processing of your personal data, except where processing rests on the right of restriction pursuant to the balance of interests according to Art. 6 (1) s.1 lit. f GDPR. This is especially the case if processing is not necessary to perform a contract concluded with you. When exercising such an objection, we ask you to explain the reasons why we should not process your personal data as we have done. In the event of your justified objection, we will examine the situation and either stop or adjust the data processing, or inform you of our compelling reasons for protection, on the basis of which we will continue processing.

You may indeed object, at any time, to the processing of your personal data for purposes of advertising and data analysis. You can inform us of your objections to advertising using the contact details provided in this data protection declaration.

#### **4. "Cookies" - information that is automatically stored on your computer**

When you visit one of our websites, we may store information on your computer in the form of a "cookie", which we automatically recognize on your next visit. If you do not want us to recognize your computer, please set your Internet browser so that it deletes cookies from your computer hard disk, blocks all cookies, or warns you before a cookie is stored. However, we would like to point out that the use and especially the ease of usage of the website is restricted without cookies.

The information on the cookies from other providers, or those set by third parties (see below) contains a link where you can explain your objection. In this context, the provider places an opt-out cookie on your computer which prevents further data from being collected. For the period of time you continue to maintain your objection, you should not delete the opt-out cookie. If you subsequently delete this cookie, you must reactivate it again. In addition, you can object to the collection and storage of data through many other services, at any time, with effect for the future, e.g. at: <http://www.youronlinechoices.com/de/praeferenzmanagement> or <http://www.youronlinechoices.com/>

## 5. Notes on web analysis

To optimize our websites and marketing, we use various web analysis programs that collect pseudonymized data. The programs are described in detail below:

### 5a. Google Analytics

This website uses Google Analytics, a web analysis service by Google Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help analyze how users use the website. The information generated by the cookie about your use of the website is normally transmitted to a Google server in the USA and stored there. However, if IP anonymization is activated on this website, Google shortens your IP address beforehand for Member States of the European Union or for other countries party to the Agreement on the European Economic Area. Only in exceptional cases is the full IP address transmitted to a Google server in the USA and shortened there. This information is used, on behalf of website operator, by Google to evaluate your use of the website, to compile reports on website activity and to provide the website operator with other services relating to website and Internet usage. The IP address transmitted by your browser in the context of Google Analytics is not merged with other Google data. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of this website. You can also prevent Google from collecting the data generated by the cookie, relating to your use of the website (including your IP address), and from the processing of this data by Google, by downloading and installing the browser plug-in available under the following link. Currently at: <https://tools.google.com/dlpage/gaoptout?hl=en>

In view of the discussion about the use of analysis tools that process complete IP addresses, we would like to point out that this website uses Google Analytics with the extension "\_anonymizeIp()" and, therefore, IP addresses are only processed in shortened form in order to exclude direct personal reference.

By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

The Google Analytics tracking code implemented on this website supports display advertising. Google Analytics for display advertising uses the remarketing function on this website. The ads are displayed on web pages by third parties, including Google. Third-party providers, including Google, use cookies. The combined use of first-party cookies (e.g. Google Analytics cookies) and third-party cookies (e.g. DoubleClick cookies) allows us to target, optimize and serve ads based on your previous visits to this website. You can use the [Ad Preferences Manager](#) to disable Google Analytics for display advertising and to customize ads on the Google Display Network.

The legal basis for the use of Google Analytics is provided in Art. 6 (1) s.1 lit. f GDPR.

The following Google AdWords features are used on this website:

- Remarketing
- Interest categories
- Similar target groups
- Display, video, text
- Other types of interest-based advertising

We use these Google AdWords features to redirect visitors to third-party websites or Internet users with specific-interest profiles based on their Internet usage. We do not collect any personal information with our cookies, remarketing lists or other anonymous IDs.

The legal basis for the use of Google Analytics is provided in Art. 6 (1) s.1 lit. f GDPR.

#### **5b. Google Adsense**

This website uses Google Adsense, a web ad service of Google Inc, USA ("Google"). Google Adsense uses "cookies", which are text files placed on your computer, to help analyze how users use the website. Google Adsense also uses so-called "Web Beacons" (small, invisible graphic data) to collect information. By using the Web Beacon, simple actions such as visitor traffic can be recorded and collected on the website. The information generated by the cookie and/or web beacon about your use of this website (including your IP address) will be transmitted to and stored by Google on servers in the USA. Google will use this information to evaluate your use of the website with regard to advertisements, to compile reports on the website activities and advertisements for the website operators as well as to provide other services associated with the use of the website and the Internet. Google may also transfer this information to third parties, where required to do so by law, or where such third parties process the information on Google's behalf. Under no circumstances will Google associate your IP address with other Google data. You can prevent cookies from being stored on your hard disk and the display of web beacons by selecting "do not accept cookies" in your browser settings (in MS Internet Explorer under "Tools > Internet Options > Privacy > Settings"; in Firefox under "Tools > Settings > Privacy > Cookies"); however, we would like to point out that in this case you may not be able to use all of the website functions to the full extent. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

The legal basis for the use of Google Adsense is provided in Art. 6 (1) s. 1 lit. f GDPR.

#### **5c. Lucky Orange**

Our website uses Lucky Orange technologies (Lucky Orange LLC, 8220 Travis Street Suite 210, Overland Park, KS 66204 USA) to collect and store the analysis service interaction data mentioned in 5a. and 5b. in order to optimize user friendliness and improve our services. You can deactivate the Lucky Orange service at any time at <http://luckyorange.com/disable.php>

The legal basis for the use of Lucky Orange is provided in Art. 6 (1) s.1 lit. f GDPR.

### **6. Minors**

Minors should not transmit any personal data to our websites without the consent of their parents or guardian. We strongly encourage all parents and guardians to instruct their minors in the safe and responsible handling of personal data in the Internet. In any case, we will not knowingly collect personal data from minors, nor use it in any way, nor disclose it to third parties without authorization.

### **7. Security**

We take precautions to ensure the security of your personal data. Your data is carefully protected against loss, destruction, falsification, manipulation and unauthorized access or unauthorized disclosure.

### **8. Links to other websites**

Our websites contain links to other websites. We are not responsible for the data protection strategies or the content of these other websites.

## 9. Questions and remarks

You can request free information about your personal data stored by us at any time. You are also entitled to request the correction, blocking or deletion of your personal data, with the exception of such personal data which are required by us for invoicing purposes, or for which a legal retention period applies.

Please send any request by email to: [L.merle@language-consulting.com](mailto:L.merle@language-consulting.com)

or to:

Lutz Merle, Augustastrasse 58, D-42119 Wuppertal, Germany

## 10. Changes to this Data Protection Notice

The status of the data protection notice is indicated by the date indicated (see below). We reserve the right to change this data protection notice at any time with effect for the future. An up-to-date version can be downloaded directly from our website. Please visit our website regularly and inform yourself about the applicable data protection declaration.

## 11. Special data protection declaration for the ClientCentre

If you are interested in taking language training and using our Online Client Centre, it is necessary for the conclusion, evaluation and performance of the contract that you provide us with the personal data we require to carry out and evaluate the language test. Mandatory information necessary to do the language test is marked separately. The data you provide (first name, surname, email address, employer) will be used to process and evaluate your test.

The legal basis for the use of your data to answer your contact enquiries is provided in Art. 6 (1) s.1 lit. b GDPR.

When registering, you will be asked to indicate whether you agree that one of our language advisors will receive the results of your language test. This is done for evaluation and training purposes. The consent is voluntary and can be revoked at any time with effect for the future.

The legal basis for this is Art. 6 (1) s.1 lit. a GDPR.

You will also be asked to indicate whether you agree to your test results being passed on to your employer's HR department. The consent is voluntary and can be revoked at any time with effect for the future.

The legal basis for this is provided in Art. 6 (1) s.1 lit. a DGPR.

You can download this data protection declaration as a PDF file [here](#).

Status of this data protection declaration: May 2018