

The General Data Protection Regulation in the European Union

How It Applies to Freelance Translators Worldwide

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Session Outline

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- **GDPR Scope, Principles and Obligations**
 - Step 1: Let's take a look at what we do
 - Step 2: Let's get organized (register)
 - Step 3: Let's prepare our tools to meet our obligations (our websites, our mailing marketing campaigns, our translation workflow, our invoicing processes)
 - Step 4: Let's secure our data
 - Step 5: Let's translate
 - Step 6: Let's invoice our clients and pay our suppliers
 - Other Topics

What is the General Data Protection Regulation (“GDPR”)?

- Regulation (EU) 2016/679 to protect data subjects with regard to their personal data (GDPR, Art. 1)
 - Data subjects = natural persons living in the EU/EEA (Iceland, Lichtenstein and Norway)
 - ‘Personal data’ = any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (GDPR, Art. 4)

What is the main purpose of the General Data Protection Regulation (“GDPR”)?

Gives certain rights to data subjects

- Access to your privacy policy (GDPR, Art. 12, 13 and 14)
- Confirmation whether you are/are not processing their personal data (GDPR, Art. 14)
- Access to their personal data (GDPR, Art. 12, 13 and 14)
- Rectification of inaccurate personal data (GDPR, Art. 16)
- Erasure of personal data (= “right to be forgotten”) (GDPR, Art. 17)
- Restriction of processing (GDPR, Art. 18)
- Object to processing (GDPR, Art. 21)
- Withdraw their consent to have their data processed (GDPR, Art. 13.2.c & 14.2.d)
- Data portability (GDPR, Art. 20)
- Not be subject to a decision based solely on automated processing, including profiling (GDPR, Art. 22.1)
- Raise complaints with a Data Protection Authority

Does GDPR apply to you?

- Do you deal with clients in the EU?
 - Website: EUR prices? Languages? References to EU clients?
- Do you translate files which contain EU data subjects' personal data (e.g. birth certificate, passport, resume...)
- B2B +B2C: professional email address = personal data!
- It does not matter where YOU live (GDPR, Art. 3)
- GDPR was implemented in EU member states' national legislation

Principles of privacy by design applicable to translators

- Lawfulness, **fairness** and **transparency** (your privacy policy)
- **Purpose** limitation
- Data minimization
- **Accuracy** (obligation to maintain a register of files)
- Storage limitation
- **Integrity** and **confidentiality** (**security**)
- **Accountability** (data protection impact assessment)

(GDPR, Art. 5)


In plain English... When you process EU data subjects' personal data

- Say what you do and do what you say
- Be concise and go straight to the point
- To become “GDPR-compliant”, trying is not enough – you need proof that you’ve tried really hard!

Who are we under the GDPR?

	When we do administration/ marketing and billing activities	When we translate
Under the GDPR, who are we?	A Controller	A Processor or a Sub-Processor
Why?	We determine the purposes and means of the processing of personal data	We process the personal data on behalf of the controller
Our main duties?	<ul style="list-style-type: none">• Protect the data subject's personal data (GDPR, Art. 24)• Allow the data subjects to exercise their rights (GDPR, Art. 12)• Report any personal data breach to the Data Protection Authorities and the data subjects (GDPR, Art. 33)• Comply with your transparency requirements (GDPR, Art. 12, 24)	<ul style="list-style-type: none">• Process the data based on the data controller's instructions (GDPR, Art. 28)• Protect the data subject's personal data (GDPR, Art. 28)• Help the data controller meet their obligations (GDPR, Art. 28)

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Step 1 - Let's take a look at what we do

It's time to audit our businesses!

The translation business life cycle - as simple as writing down what we need and what we do.

The goal: having a picture in mind to create your register (one of the key tools for GDPR compliance) and set up your legal documentation.

Step 1 - Let's take a look at what we do (cont.)

- We have a website
 - Contact form?
 - Web analytics tool?
- We send emails to our clients to keep them informed
- We exchange files
- We send warm emails to qualified leads
- We translate and add segments to our TMs
- We save our projects and need them for our repeat clients
- We send invoices to our clients and pay our suppliers

Step 1 - Let's take a look at what we do (cont.)

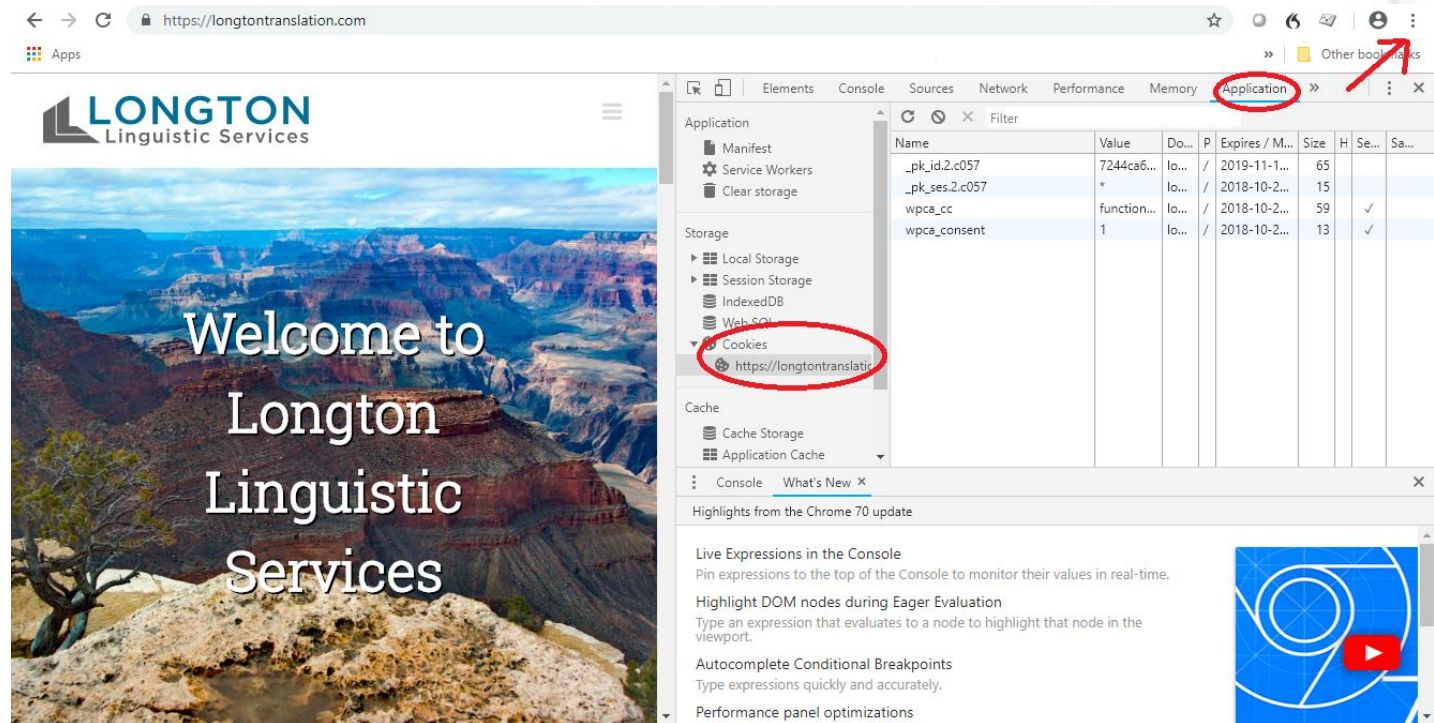
– Our legal documents

- We use service providers:
 - Email services
 - Software to exchange files
 - SaaS in the cloud (e.g. backup system?)
 - Hosting environment
 - Billing system
 - ...
- **Every time you use a service provider to process personal data, you need appropriate safeguards to make sure the service provider will only process the data for the purposes you need, nothing else:**
 - **Check if your service provider's general terms of use contain a data processing agreement**
 - **In case of doubt, check your data processing agreement with your lawyer**


Step 1 – Let's take a look at what we do (cont.)

– Our website

- Does your website collect personal data?
 - Contact form – copies on your hosting environment?
- Cookies?
 - Expiration time?
 - Name?
 - Functional/Analytics cookie?
- IP addresses in Analytics tool?



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Step 2 – Let's list our files and organize our data - Create a register

- 1. Where is our data?
 - Local electronic storage (computer, local discs, USB device/key...)
 - Online storage
 - Website: Copies of email requests submitted through your website contact form
 - Cloud
 - Online backup systems
 - Email boxes
 - Cookies: IP addresses collected by your website
 - Paper documents (business cards anyone?)
- 2. Let's delete/destroy all data we no longer need!
 - Mandatory retention period?
- 3. Create a register with the data you need to keep (GDPR, Art. 30)

Step 2 – Let's list our files and organize our data

- Create a register (cont.)


- **Template for Controllers (GDPR, art. 30):**

[illegible]

- **Template for Processors:**

	A	B	C	D	E	F	G
1							
2	Name and contact details		Processor		Representative (if applicable)		
3	Name		Name		Name		
4	Address		Address		Address		
5	Email		Email		Email		
6	Telephone		Telephone		Telephone		
7							
8	Article 30 Record of Processing Activities						
9	Link to contract with controller	Name and contact details of controller	Name and contact details of controller's representative (if applicable)	Categories of processing	Names of third countries or international organisations that personal data are transferred to (if applicable)	Safeguards for exceptional transfers of personal data to third countries or international organisations (if applicable)	General description of technical and organisational security measures (if possible)
10							
11							
12							
13							
14							
15							
16							

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Step 3 – Your tools

Your website - your “master tool” for GDPR compliance

- A privacy policy
- Your contact form
- A cookie policy
- A cookie banner

Your internal documents for GDPR compliance

Data processing agreements (SaaS, email providers, hosting company, other linguists...)

Step 3 – Your tools

Your website - your “master tool” for GDPR compliance (cont.)

A privacy policy and a cookie policy available on your website:

[Home](#) | [About](#) | [Services](#) | [faq](#) | [Contact](#) | [Legal Notice](#) | [Terms and Conditions](#) | [Privacy Policy](#) | [Cookie Policy](#)

Website created by [Delicieux Services](#)

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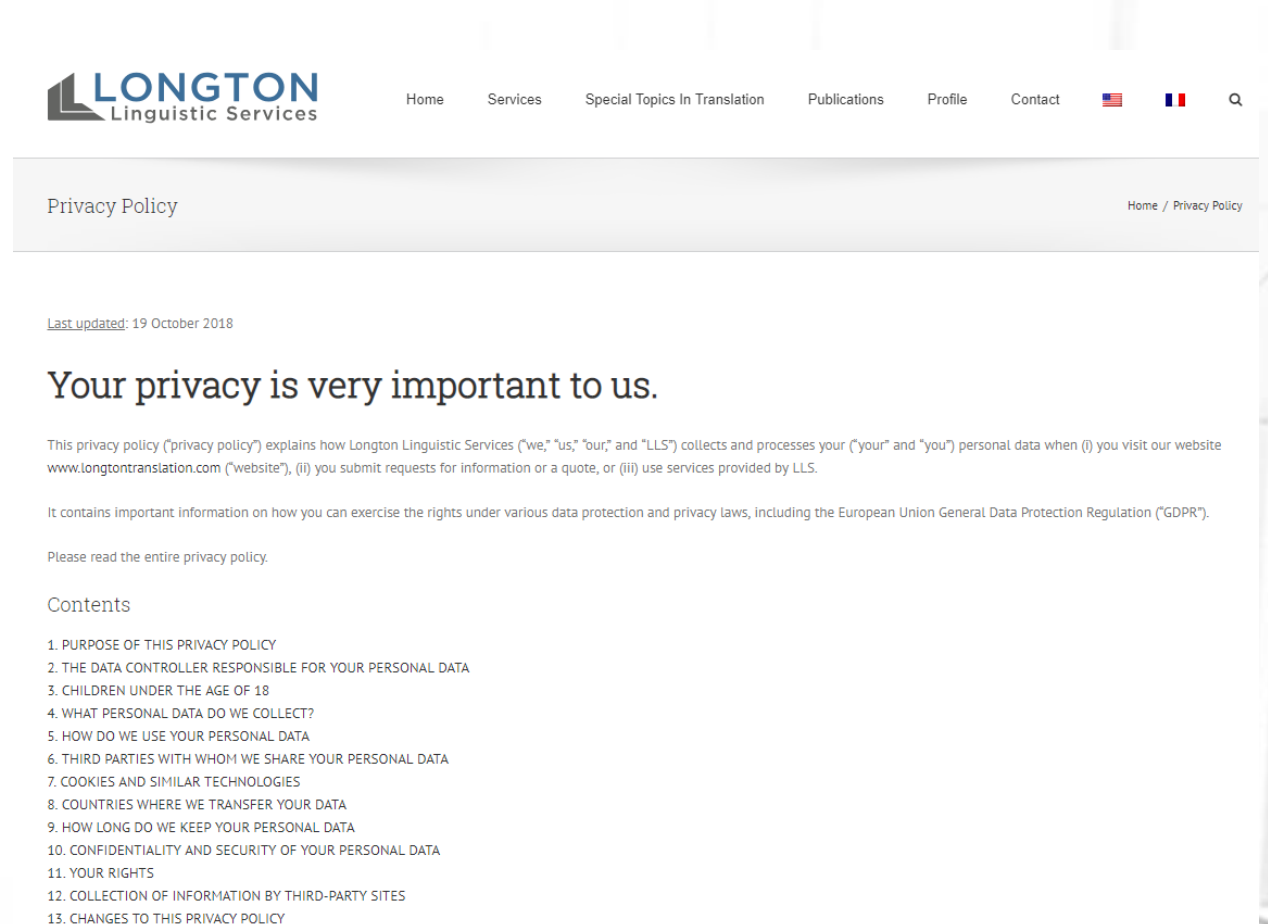
How to go about it?

- Cookie Policy: EU templates available
- Privacy Policy: unfortunately**, there is no official template available.
- Talk to your local attorney! If outside the EU, ideally an attorney who works in partnership with an EU attorney of your targeted country.

Step 3 – Your tools

Your website - your “master tool” for GDPR compliance (Cont.)

- **Privacy Policy = your most important document to meet your transparency requirement!!!**
- **Transparency requirement: SAY WHAT YOU DO**
- Use clear language (no legalese)
- Content: GDPR, Art. 13 or Transparency Guidelines, Annex
- Only include your activities as a controller
- If processing changes, update the Privacy Policy + notify users



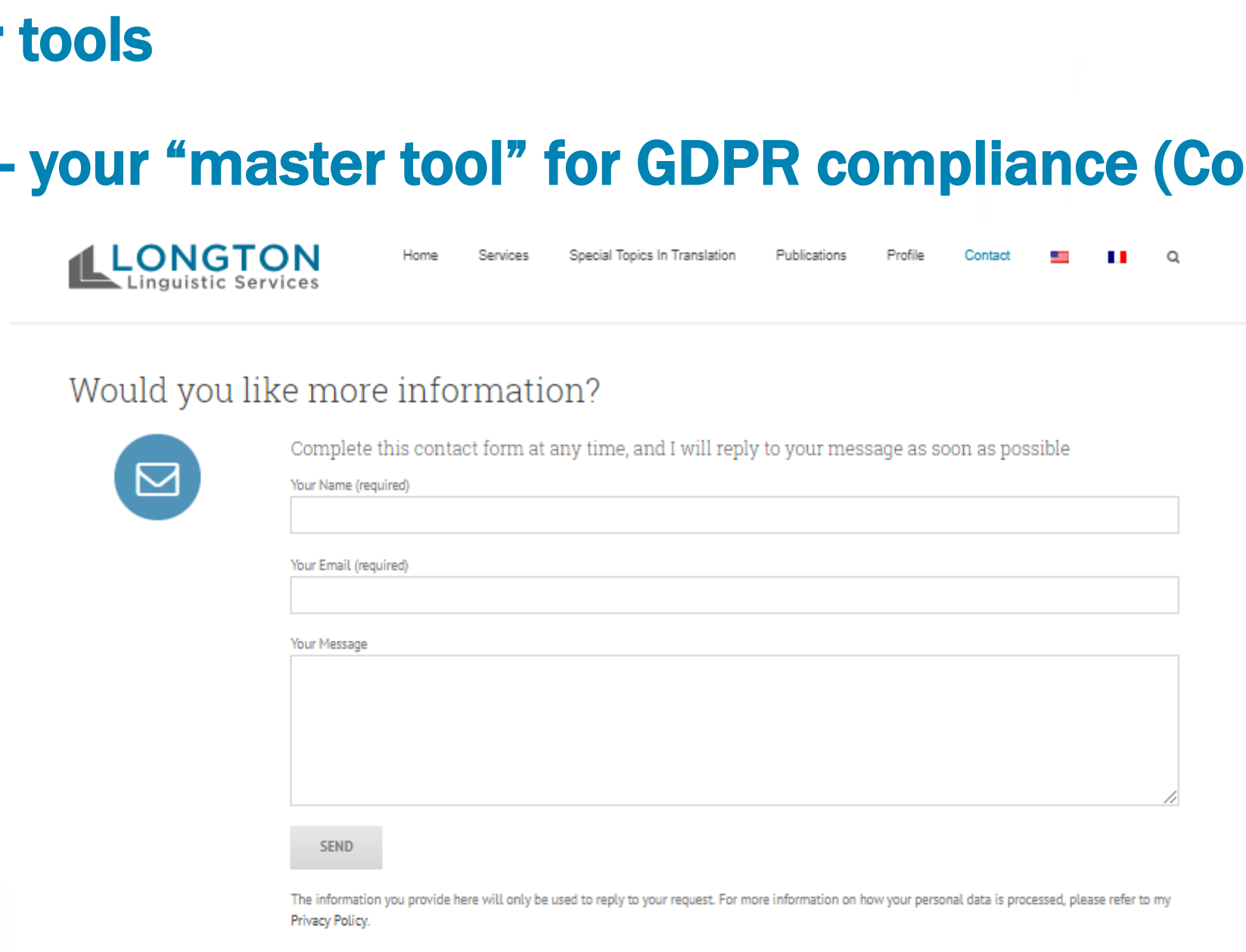
Step 3 – Your tools

Your website - your “master tool” for GDPR compliance (Cont.)

Your contact form




TRANSPARENCY REQUIREMENT:

- Purpose of processing?
- Link to Privacy Policy



The screenshot shows the contact form on the Longton Linguistic Services website. The header includes the company logo and a navigation menu with links to Home, Services, Special Topics In Translation, Publications, Profile, and Contact. There are also flags for the USA and France, and a search icon. The main heading of the form is "Would you like more information?". Below this is a blue circular icon with a white envelope. The form consists of three input fields: "Your Name (required)", "Your Email (required)", and "Your Message". A "SEND" button is located below the message field. At the bottom, a disclaimer states: "The information you provide here will only be used to reply to your request. For more information on how your personal data is processed, please refer to my Privacy Policy."

LONGTON
Linguistic Services

Home Services Special Topics In Translation Publications Profile [Contact](#)   

Would you like more information?

Complete this contact form at any time, and I will reply to your message as soon as possible

Your Name (required)

Your Email (required)

Your Message

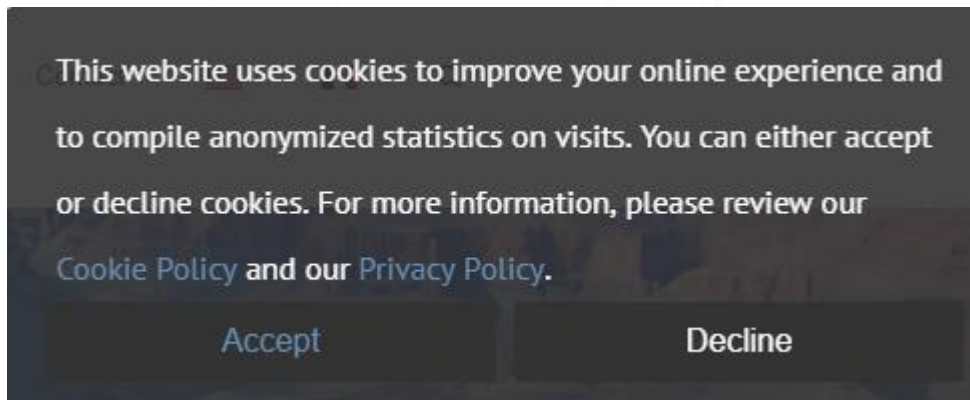
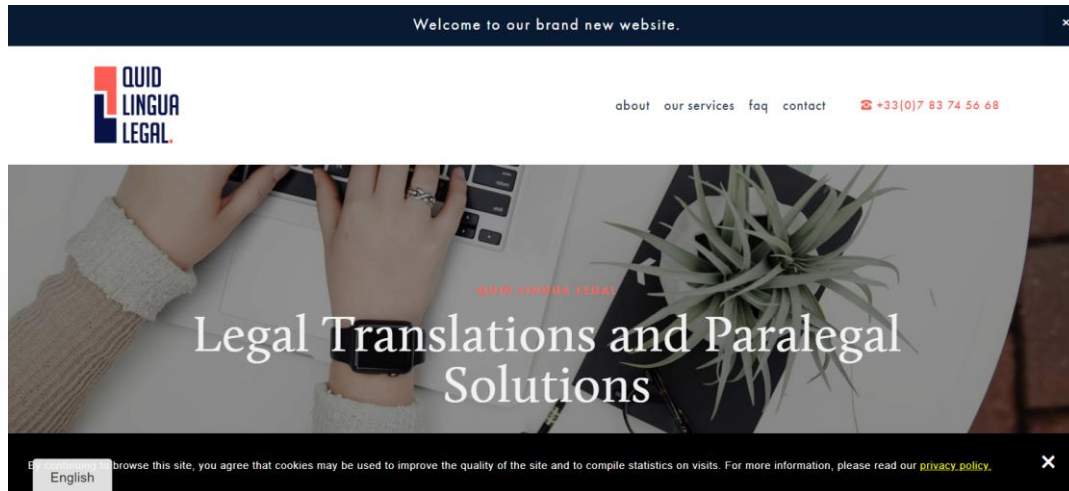
[SEND](#)

The information you provide here will only be used to reply to your request. For more information on how your personal data is processed, please refer to my [Privacy Policy](#).

Step 3 – Your tools

Your website – your “master tool” for GDPR compliance (cont.)

A **cookie-banner** referencing your privacy policy:



Step 3 – Your tools

Your website – your “master tool” for GDPR compliance (cont.)

Different cookies, different purposes and objectives:

- Functional Cookies
- **Analytics/performance cookies**
 - Where the « OK » button of your cookie banner comes in: under current EU cookie law, you must have your website user's consent
 - **Otherwise, your site should not run analytics and performance cookies**

In any event, your analytics tool should not display complete IP addresses (anonymized addresses only at most)!!!

Step 3 – Your tools

Your mailing marketing tool - how to inform clients and potential clients

- Legal basis = prior consent
- **Legitimate interest – Be careful!!!**
- Clear and easy way to unsubscribe



Email marketing tools now offer GDPR options, **but watch out!**

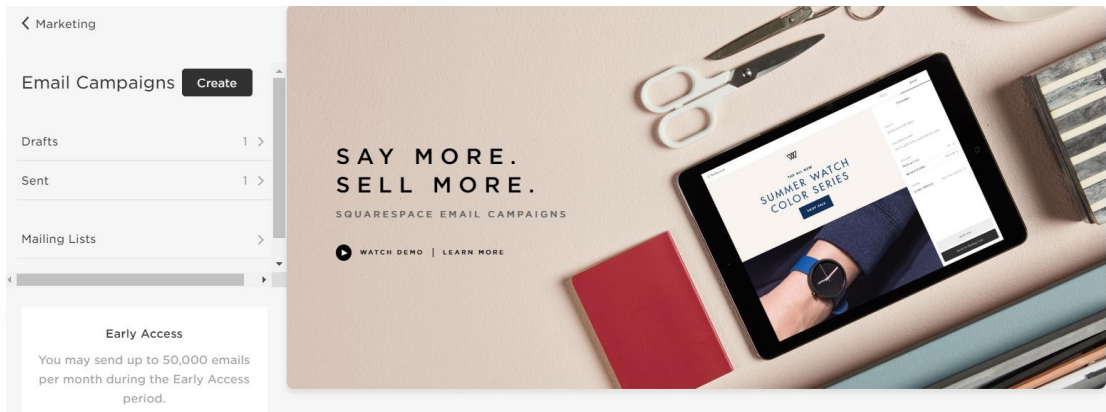
Ex: Squarespace new marketing campaigns

MailChimp GDPR option

Step 3 – Your tools

Your mailing marketing tool - how to inform clients and potential clients (cont.)

Examples: Email marketing campaigns with Squarespace and Mailchimp



Step 3 – Your tools

Your mailing marketing tool - how to inform clients and potential clients (cont.)

Example: Email marketing campaign/creating mailing lists

Cancel

New Subscriber

Done

EMAIL ADDRESS

audrey.pouigny@gmail.com

NAME

Audrey

Pouigny

CONFIRM PERMISSION

Marketing ☒

By checking, you confirm that you have permission to send these subscribers marketing emails.

Do not add subscribers who have previously unsubscribed.

Add subscriber

Want to subscribe more than one person at a time? [Import a list](#)

Email Address *

audrey.pouigny@gmail.com

First Name

Audrey

Last Name

Pouigny

☒ This person gave me permission to email them

This person will not receive a confirmation email from MailChimp. Since you're adding this recipient manually, they won't have an opt-in IP address or date in your records, so be extra sure you have permission first. [Learn more](#)

☐ If this person is already on my list, update their profile

Subscribe

Step 3 – Your tools

Your mailing marketing tool - how to inform clients and potential clients (cont.)

Scenario #1: You send an email to your regular/active clients

You should inform your clients about why they receive the message, inform them of the option to unsubscribe at any time, and provide a link to your privacy policy.

Example ( with hyperlinks to corresponding page):

"You are receiving this e-mail because we have had the opportunity to correspond in the context of translation projects. You can unsubscribe from our communications at any time by clicking on the link below: .

For more information, you can consult our  »

Step 3 – Your tools

Your mailing marketing tool - how to inform clients and potential clients (cont.)

Scenario #2: You send an email to prospective clients

You can send emails to prospective clients if they have expressed a **specific need** for translation services and if you make a **commercial offer**.

Example (**_____** with hyperlinks to corresponding page):

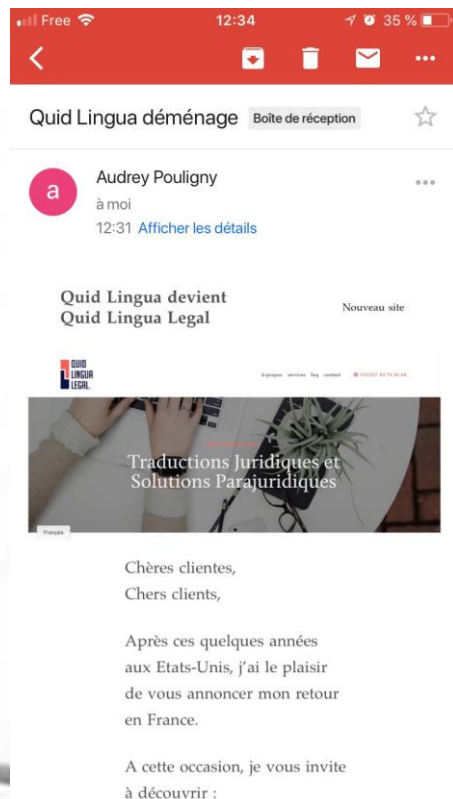
" You are receiving this e-mail because your firm has posted an announcement on **_____** (website name or magazine column name) expressing a need for translation services. You can unsubscribe from our communications at any time by clicking on the link below: **click here**.

For more information, you can consult our **privacy policy** »

Step 3 – Your tools

Your mailing marketing tool - how to inform clients and potential clients (cont.)

Example: Email marketing campaign/quick and easy way to unsubscribe!




Désinscrit

audrey.poulligny@gmail.com ne recevra plus
d'emails de la part de Quid Lingua Legal -
Traduction juridique anglais, français.

Nouvelle inscription

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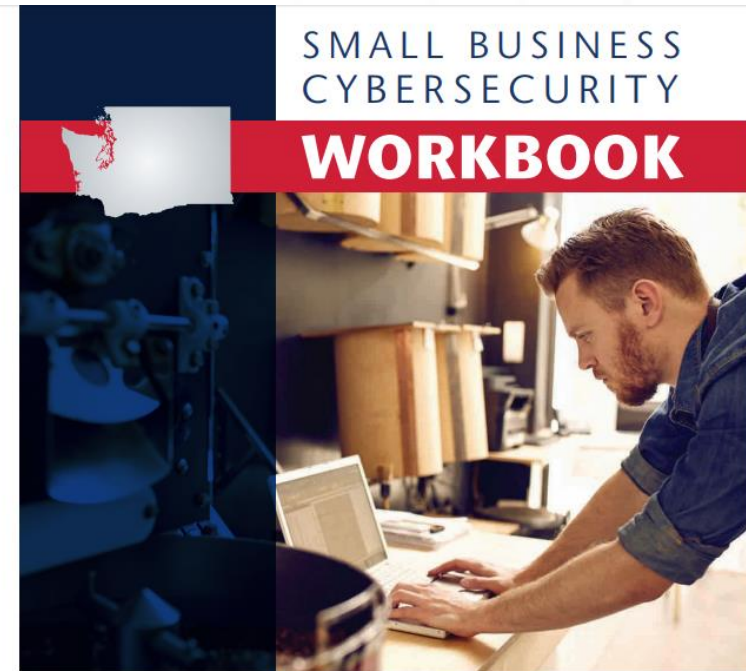
Step 4 – Let's secure our data

GDPR requirements:

- Process personal data in a manner that ensures appropriate security of the personal data (GDPR, Art. 5)
- Data Protection by design and by default (GDPR, Art. 25)

How to do it?

- Define a Security Framework (GDPR, Art. 32.1.d)
- Follow (your) national/international standards (ISO IEC 27001:13)



Step 4 – Let's secure our data (cont.)

- **Short Term Plan** (as soon as you leave this room/the conference): stick to the golden rules:
 - **Never ever** click a hyperlink or open an attached file you do not trust within an email
 - Make sure all your devices are protected against unauthorized access (phone, laptop, desktop, modem...)
 - Use strong passwords
 - Encrypt any sensitive or personal data... anything that is important to you!
 - Don't keep your passwords on your device (check www.lastpass.com)
 - Set your devices to apply security patches automatically
 - Use an antivirus software at all times on all devices
 - Only keep the data you absolutely need on your working computer
 - **Never ever ever...** send sensitive information over email, text message or any unsecure platform (check <https://signal.org/>)
 - Don't use the WiFi in public places
 - Back up your data:
 - Cloud (check www.carbonite.com)
 - Local: use at least two separate devices
 - Keep up with the security news

Step 4 – Let's secure our data (cont.)

- LONG TERM PLAN: set up your Cybersecurity Plan

Nr.	Step	Description
Step 1	IDENTIFY	Identify your organization's members as well as the hardware, the software and the data that need protection
Step 2	PROTECT	List every means you have to protect all items identified in step 1
Step 3	DETECT	Be able to recognize if something is going wrong
Step 4	RESPOND	Create an incident response plan and know who to call for help
Step 5	RECOVER	Be able to get your business back to normal after a breach or other incident

Step 4 – Let's secure our data (cont.)

- Complete the NIST framework spreadsheet first (see toolbox at end of presentation)

Function Unique Identifier	Function	Category Unique Identifier	Category
ID	Identify	ID.AM	Asset Management
		ID.BE	Business Environment
		ID.GV	Governance
		ID.RA	Risk Assessment
		ID.RM	Risk Management Strategy
PR	Protect	PR.AC	Access Control
		PR.AT	Awareness and Training
		PR.DS	Data Security
		PR.IP	Information Protection Processes and Procedures
		PR.MA	Maintenance
		PR.PT	Protective Technology
DE	Detect	DE.AE	Anomalies and Events
		DE.CM	Security Continuous Monitoring
		DE.DP	Detection Processes
RS	Respond	RS.RP	Response Planning
		RS.CO	Communications
		RS.AN	Analysis
		RS.MI	Mitigation
		RS.IM	Improvements
RC	Recover	RC.RP	Recovery Planning
		RC.IM	Improvements
		RC.CO	Communications

Step 4 – Let's secure our data (cont.)

NIST framework – Step 2 – Secure your data at rest

- If you don't have an antivirus software, find one that fits your needs:
 - <https://www.pcmag.com/article2/0,2817,2372364,00.asp>
- Tools to protect your files in your system
 - 7-zip
 - VeraCrypt
- Methods to protect personal data:
 - Anonymization (e.g. IP addresses)
 - Pseudonymization

Step 4 – Let's secure our data (cont.)

NIST framework – Step 2 – Secure your data in transit

French Data Protection Authority's recommendation:

- 7-zip (use the AES-256 encryption method) Free easy-to-use software!
And send encryption key/password through separate means (e.g. text message)
- An exchange platform using a secure protocol like an https:// server (maybe some of your clients require you to use one)
- Anonymize or pseudonymize your personal data
- Other solutions:
 - Office 365 (at least E3 product with Azure protection layer)
 - WeTransfer (company headquarters in Amsterdam, free version till 2 GB/file sent)


Compare prices, offers... and talk to your client !!

Step 4 – Let's secure our data (cont.)

Draft your Security Policy

- Based on your NIST framework spreadsheet
- Use plain, clear language, no legalese
- Structure of your Security Policy (see template links at the end of the presentation)
 - Introduction
 - Security Identification Policy
 - Security Protection Policy
 - Security Detection Policy
 - Security Response Policy
 - Security Recovery Policy

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Step 5 – Let's translate

1. Does the file you need to translate contain EU data subjects' personal data?
2. Secure all files, during transfer and storage (encryption/anonymization/pseudonymization methods)
3. Update your GDPR register
4. Make sure your legal documentation is in place, i.e. data processing agreement. **If you work with partners/are based outside the EEA, you will need to make sure you have appropriate safeguards in place (GDPR, Art. 46)**
5. Keep your files only for the required time
6. When you are acting as a data processor, strictly follow the data controller's instructions (GDPR, Art. 28)

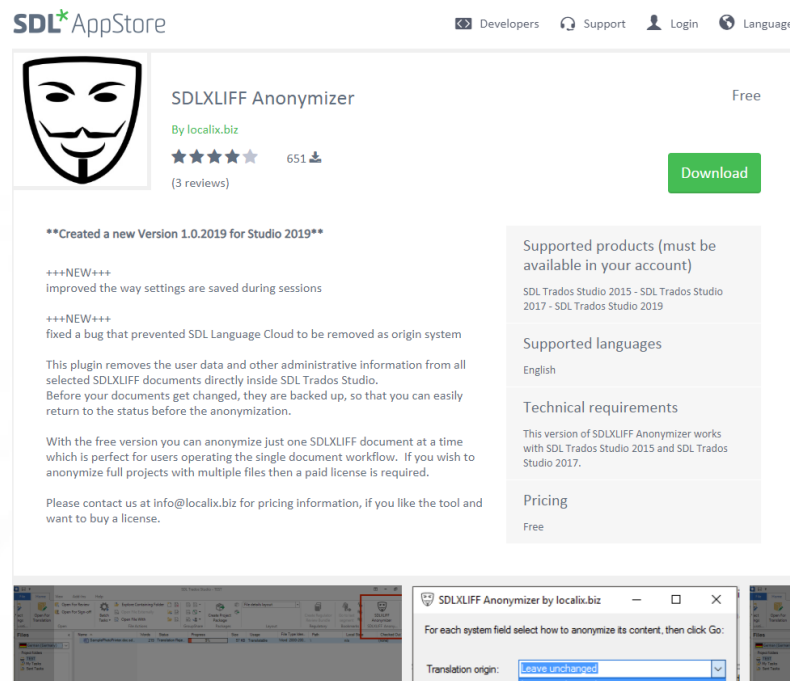
Step 5 – Let's translate (cont.) – transferring data out of the EU

When personal data is transferred out of the EU, certain requirements must be met (GDPR, Art. 44 to 50):

- Did the European Commission decide the third country ensures an adequate level of protection:
 - Check: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en#dataprotectionincountriesoutsidetheeu
 - United States: Privacy Shield??
 - Auto certification mechanism
 - In practice, cost may be high for freelance translator (could be \$1,000/year)
- Standard Contractual Clauses (but may not be used for sub-processors)
 - May have to obtain clear mandate from EEA-based controller to EEA-based processors to use standard contractual clauses
- Other solution: EEA-based translator must anonymize/pseudonymize data **BEFORE** sending file to translate to their non-EU sub-processors

Step 5 – Let's translate (cont.)

- Some CAT tool companies have developed some anonymization/GDPR tools.



SDL*AppStore Developers Support Login Language

SDLXLIFF Anonymizer

By [localix.biz](#)

★★★★★ 651 (3 reviews)

[Download](#) Free

****Created a new Version 1.0.2019 for Studio 2019****

+++NEW+++
Improved the way settings are saved during sessions

+++NEW+++
fixed a bug that prevented SDL Language Cloud to be removed as origin system

This plugin removes the user data and other administrative information from all selected SDLXLIFF documents directly inside SDL Trados Studio.
Before your documents get changed, they are backed up, so that you can easily return to the status before the anonymization.

With the free version you can anonymize just one SDLXLIFF document at a time which is perfect for users operating the single document workflow. If you wish to anonymize full projects with multiple files then a paid license is required.

Please contact us at info@localix.biz for pricing information, if you like the tool and want to buy a license.

Supported products (must be available in your account)
SDL Trados Studio 2015 - SDL Trados Studio 2017 - SDL Trados Studio 2019

Supported languages
English

Technical requirements
This version of SDLXLIFF Anonymizer works with SDL Trados Studio 2015 and SDL Trados Studio 2017.

Pricing
Free

SDLXLIFF Anonymizer by localix.biz

For each system field select how to anonymize its content, then click Go:

Translation origin: [Leave unchanged](#)

Step 6 – Let's invoice our clients/pay our suppliers

- Again... secure your clients and suppliers' financial information
- Don't store credit card information
- Observe your data retention period

Other Topics – Making sure EU data subjects can exercise their rights

1. State all rights the data subject can exercise in your Privacy Policy
2. Your Privacy Policy must indicate how to contact you
3. Subject Access Requests (SAR): timeline = one month (GDPR, Art. 12.3, 12.4)
4. Give reasons if you don't intend to comply with the request (GDPR, Art. 12.4)
5. Free of charge (unless repetitive/unfounded/excessive requests) (GDPR, Art. 12.5)

Other Topics – Protection authorities and ISO standards

- No existing ISO standard can be used as a GDPR certificate.
- As of today, GDPR certifications are not delivered by protection authorities.
- May exist in the future, however costs may be too high for freelance translators.
- Consulting an attorney for GDPR compliance (ideally an EU lawyer or a US lawyer in partnership with an EU Lawyer) can serve as a “certificate” evidencing the measures put in place and efforts made toward GDPR compliance.
- Remember: as of today, being 100% compliant is not possible!!!

Other Topics – Data violation: what to do?

Data controllers must report a personal data breach to their supervisory authority within 72 hours, and in some cases to the concerned data subjects.

The steps to follow will differ depending on the type of breach and the competent Data Protection Authority.

Example on the ICO's website:

<https://ico.org.uk/for-organisations/report-a-breach/>

Data processors must report the data breach to the data controller (see your data processing agreements) (in general less than 72 hours...)

GDPR, Art. 33 and 34

List of general resources

General Information	
Official regulation	https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=FR
Structured overview of the regulation	https://cnpd.public.lu/en/legislation/droit-europ/union-europeenne/rgpd.html
ITI Brochure	http://www.atanet.org/resources/ITI_Guide_to_GDPR.pdf
WP29 Guidelines	http://ec.europa.eu/newsroom/article29/news.cfm?item_type=1360
Data Subjects' Rights	GDPR, chapter III (= articles 12 to 23)

List of general resources (cont.)

Data Registers

**Write your records
of processing
activities**

- **Template for data controllers:**
<https://ico.org.uk/media/for-organisations/documents/2172937/gdpr-documentation-controller-template.xlsx>
- **Template for data processors:**
<https://ico.org.uk/media/for-organisations/documents/2172936/gdpr-documentation-processor-template.xlsx>

List of general resources (cont.)

Prepare your Website	
Privacy Policy	Guidelines on Transparency under Regulation 2016/679 (wp260rev.01) (http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=622227)
Cookie Banner/Tag Manager	<ul style="list-style-type: none">- WeePie Cookie Allow Plugin (WordPress platform): https://www.weepie-plugins.com/cookie-allow/- Tarteaucitron: https://opt-out.ferank.eu/en/ <p>Tip: check what your/the EU Data Protection Authority/ies recommend(s)/use(s)</p>
Cookie Policy Template	http://ec.europa.eu/ipg/basics/legal/cookies/index_en.htm
Your legal information on your contact form	Guidelines on Transparency under Regulation 2016/679 (wp260rev.01) (http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=622227)

List of general resources (cont.)

Protect your Personal data

SBDC Small Business Cybersecurity Workbook	http://wsbdc.org/wp-content/uploads/2017/03/Sm-Bus-Cybersecurity-Workbook-opt.pdf
NIST Security spreadsheet	https://www.nist.gov/document-3764
Antivirus software reviews	https://www.pcmag.com/article2/0,2817,2372364,00.asp
Encryption software	<ul style="list-style-type: none"> - Examples of tools to exchange files in a secure way: <ul style="list-style-type: none"> ○ 7-Zip (https://www.7-zip.org/download.html) ○ WeTransfer (https://wetransfer.com/plus?trk=Splashpage_v40_yellow) ○ Office 365 (Enterprise E3 or E5) (https://products.office.com/en/business/compare-more-office-365-for-business-plans)
	<ul style="list-style-type: none"> - Disk encryption <ul style="list-style-type: none"> ○ Windows 10 (BitLocker) (https://support.microsoft.com/en-us/help/4028713/windows-10-turn-on-device-encryption) - Encrypt each file separately: <ul style="list-style-type: none"> ○ Office 365 (Enterprise E3 or E5) ○ 7-Zip (https://www.7-zip.org/download.html)
Write your NIST plan	Templates for the NIST Security Policy: please send email to monique@longtontranslation.com

List of general resources (cont.)

Translate	
Data processing agreements	<ul style="list-style-type: none">- Check regularly for any available template on your competent Data Protection Authority's website: to see if any template (https://edpb.europa.eu/about-edpb/board/members_en)- CNIL (French DPA) (in English) (p. https://www.cnil.fr/sites/default/files/atoms/files/rgpd-guide_sous-traitant-cnil_en.pdf)- DLA Piper's example: https://www.dlapiper.com/~media/files/insights/publications/2017/08/example_data_protection_addendum.doc

List of general resources (cont.)

Translate	
SDL Studio	https://www.regular-expressions.info/
	https://multifarious.filkin.com/tag/regex-tutorial/
	https://multifarious.filkin.com/2018/05/27/data-protection/

List of general resources (cont.)

Working with partners outside the EEA	
European Commission's Adequacy decisions	https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en
EU-US Privacy Shield	https://www.privacyshield.gov/welcome
Standard Contractual clauses	https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en FAQ concerning standard contractual clauses (covers cases for transfers from an EEA processor to a non-EEA sub-processor) https://www.cnil.fr/sites/default/files/typo/document/FAQ_Clauses_de_responsable_a_sous-traitant_EN.pdf
TM Management	Examples <ul style="list-style-type: none">- SDL Studio:<ul style="list-style-type: none">○ https://appstore.sdl.com/language/app/sd-xliff-anonymizer/580/

List of general resources (cont.)

Violation notifications	
List of EU Data Protection Authorities	https://edpb.europa.eu/about-edpb/board/members_en



Questions?