



# Privacy Policy

## Introduction

At Way With Words, transparency and privacy are part of the core of our business. We care about your privacy as much as you do and so we are committed to being upfront about our practices and how your personal data is processed. This policy explains our privacy practices for our Services.

See also our [Terms of Service](#) and [Data Processing Addendum](#).

In order to provide you, the Service User, with the Services and run our business, we need to process your personal data/information. Within the context of this policy, the terms “personal data” and “personal information” may be used interchangeably. By accepting our [Terms of Service](#), you are confirming that you have read and understand this policy including how and why we use your personal information. If you don't want us to collect or process your personal data in the manner described in this policy, you should not utilise the Services.

## Information Collected or Received

In order to provide you with our Services, we require a certain amount of information from you. This information may come from a variety of sources and may include:

## Information Provided by You

In order to create an account, we require your full name and email address. Further to this, a billing address is required for accounting purposes. You

may also provide us with a telephone number. If you upload any media for processing that contains personal data, that data will also be processed and stored by us as necessary for providing you with the Service. Credit card information is passed on to a third-party payments provider (either PayPal or PayStack, dependent upon your locale) for processing and is not stored by us.

## Information Provided from Your Use of Our Services

By accessing our website, we may gather certain information about you such as your general location and IP address to provide relevant pricing and contact channels as well as for analytics. Your operating system, version, browser and browser version, and device type may also be collected. This information is not stored by us at any time.

## Information Gathered by a Third Party

Information about your browsing activity on our site as well as data about which pages you visited may be collected by third-parties in the interests of providing live support and issue troubleshooting should a problem occur while you are browsing the website. Although this data is gathered by a third-party, access to it is restricted to ourselves. For more information on how this information is gathered, please refer to our [Cookie Policy](#).

## Information Provided About Third Parties

The personal data of third parties may be provided to us by a Service User in the course of utilising our Services, such as when uploading audio or video to us for processing. Any information obtained in this way is restricted to being stored within a transcript and is not retained in any indexable form nor further processed in any way. Policy surrounding retention and security extends to this information as well. See also the [Data Processing Addendum](#) to our Terms of Service in this regard. If you, as a Service User, are providing us with media for transcription that contains the personal data

of a third party, the onus is on you to obtain processing consent from that party.

## Choice, Control & Consent

You have the rights of access to, rectification of or erasure of your personal data and you can request restriction of the processing concerning a data subject, object to the processing of your data and request receipt of your data for transmission to another entity, subject, of course, to our right to retain your data for billing or for any purpose required by law.

By logging in to your account, you can view all of the personal information that you supplied when registering. This same interface will allow you to alter and delete certain information as well. There are some restrictions that may apply such as the inability to change your billing country. Any requests for alterations that cannot be done through your account should be directed in writing to our Data Protection Office at [dpo@waywithwords.net](mailto:dpo@waywithwords.net).

Should you wish to have your account deleted, or if you would like a copy of the data that we have relating to you and your account, you may, similarly, file a request with our Data Protection Office.

## Information Use and Legal Basis for Processing

We use the information we collect for the purposes outlined below. Most often, our legal basis for processing your data is when it is necessary to perform a contract with you, such as our [Terms of Service](#). Additionally, processing may occur as part of our legitimate business interests, such as in improving, personalising, and developing the Services, marketing new features or products that may be of interest, and promoting safety and security as described below.

### Provide, Maintain and Personalise the Services

Using the information we obtain, we are able to honour our [Terms of Service](#) contract with you as well as deliver the Services tailored specifically to you. For example, we use your approximate location to

ensure you get appropriate pricing for the region you are in and display contact details for our nearest office.

## **Improve and Develop the Services**

We also use the information we collect to troubleshoot and protect against errors, such as if you are experiencing an issue with the Services. We may also use this information to determine areas of the Services that can be improved upon or to ascertain the viability of new developments and features.

## **Communication**

We will use your information to communicate with you and send you Service notifications such as notification of transcript completion. We also use your information to provide you with assistance should you contact us for any reason. From time to time we may communicate with you regarding Service updates or changes in our business operations or of any special price offers or other information which may be of interest to you. You may notify us at any time should you wish to be excluded from such notifications.

## **Safety and Security**

We use the information we collect to promote the safety and security of the Services, our Service Users, and other parties. For example, we may use the information to authenticate Service Users, protect against fraud and abuse, respond to a legal request or claim, conduct audits, and enforce our terms and policies.

## **Transfers**

As Way With Words operates a global service, it may be necessary to transfer your data and information to other countries for processing. We rely on numerous legal bases to lawfully transfer personal information,

including, *inter alia*, your consent and Standard Contractual Clauses, which contain certain security and privacy protections.

## Sharing of Data

We share your personal data with others in the specific circumstances described below.

### For External Processing

We transfer personal data to service providers, such as:

- 1) administrative agents, data hosts, software suppliers and payments processors, who process it on our behalf, based on our instructions, and in compliance with this policy and any other appropriate confidentiality and security measures and who provide us with services globally, including in respect of customer support, information technology, payments, marketing, analytics and data analysis;
- 2) independent contractors (natural persons), who perform transcription and captioning, among other services, and are vetted by us, required to provide and verify personal details, produce a valid form of identification and who are contractually bound by strict confidentiality and data protection clauses.

### For Legal Reasons or to Prevent Harm

We may preserve or disclose information about you to comply with a law, regulation, legal process, or governmental request, to assert legal rights, to defend against legal claims or to prevent, detect, or investigate illegal activity, fraud, abuse, violations of our terms, or threats to the security of the Services or the physical safety of any person.

## Security

We have taken the measures listed below to mitigate as many issues as possible when processing your data:

## Data at Rest

The safety and security of your data is as important to us as if it were our own. To that end, we have taken all measures we can to keep it from prying eyes and malicious parties. Your provided identity and billing data are securely stored within one of our databases, access to which is restricted to only the least people necessary to provide the Services. All media (audio, video, transcripts, etc.) that we process in the course of providing you with our Services are encrypted and stored in an AWS bucket in your region, access to which is limited to only those persons necessary to perform maintenance on the server.

## Data in Transit

All of our websites and services are secured with [Transport Layer Security version 1.2 \(TLSv1.2\)](#) encryption using only the most secure ciphers and algorithms to protect your data as it moves between your device and our servers. Our primary website is compliant with PCI-DSS, NIST, and HIPAA standards for web application security.

Please do note, however, that, due to its nature, email is not a particularly secure method of communication and we cannot accept liability for loss or damage arising from any leak of data as a result of the interception or forgery of email. To this end, we discourage users from opting to have their transcripts emailed to them and recommend they collect from their online account instead.

## Retention and Deletion

Everything gathers dust, even our servers, so we like to give them a little dust every now and then to get rid of anything we no longer need. When it comes to your personal information, we only retain it as long as is necessary for us to provide you with our services. As regards your contact and billing information, we retain this for as long as you have an account with us plus any additional period required in order to comply with tax law

or other applicable legislation. All media – including audio, video, and transcripts are automatically deleted between 60 and 90 days after completion or termination of a Specific Job unless we receive a timeous request from you for return or retention of the data, or we are required to retain same in terms of Data Protection Law or any other applicable law or regulation. Payment information such as credit card numbers is never stored by us.

## Policy Regarding Minors

In order to create an account, Service Users must be at least eighteen (18) years of age, or any higher minimum age within the jurisdiction where the Service User resides. In the event we are made aware that we have collected the personal information of a minor, we will take steps to delete this information as soon as possible.

Please note that the above only extends to the creation of accounts for processing (i.e. a Service User as defined in our [Terms of Service](#)). There may be instances where data concerning a minor is provided to us by a Service User in the interests of us supplying the Service User with the Services. In such an instances specific consent for the use of such data is required (see Information Provided About Third Parties above).

Parents or guardians who believe that their child has submitted personal information to us and would like to have it deleted may contact our Data Protection Office at [dpo@waywithwords.net](mailto:dpo@waywithwords.net).

## Policy Changes

Should we find it necessary to amend or alter this policy, all changes will be posted online. In the event any changes are made that we believe impact you significantly, we will let you know by doing one (or more) of the following: (i) posting a notice on our website, or (ii) sending you an email about the changes.

## Contact

If Way With Words SA (Pty) Limited provides you with the Services, then you may contact us at our offices at:

Way With Words SA (Pty) Ltd  
First Floor, Vineyards Square North,  
The Vineyards Office Estate,  
99 Jip de Jager Drive  
De Bron, Western Cape  
7530  
South Africa

If Way With Words Limited, a registered UK company, provides you with the Services, then you may contact us at your nearest satellite office, listed at <https://waywithwords.net/contact-us>, or at:

Way With Words Limited  
Caledonian House Business Centre,  
164 High Street,  
Elgin  
IV 30 1BD  
United Kingdom

The email address for our Data Protection Office is [dpo@waywithwords.net](mailto:dpo@waywithwords.net) and your enquiry can be addressed to either the Data Protection Officer, in respect of Way With Words Limited (UK), or the Information Officer, in respect of Way With Words SA (Pty) Ltd (South Africa).

If you feel that your rights have been infringed in any way you also have the right to complain to your local data protection authority. In South Africa this is the [Information Regulator](#). In the UK it is the [Information Commissioner's Office](#).