

# PRIVACY POLICY

Last updated: 08 June 2026.

## 1. Introduction

This Privacy Policy describes how **GALAXY MOTION LTD** (“Company”, “we”, “us” or “our”), a company incorporated in England and Wales with company number 15634914 and registered at 33 St Leonard’s Road, Hull, England, HU5 1BF, gathers, processes, discloses, and safeguards personal data when you access or use our website at <https://linguent.com/> (the “Website”) and related services (the “Services”).

We take your privacy seriously and are dedicated to handling your personal data responsibly and in compliance with all applicable data protection legislation, including the UK General Data Protection Regulation (UK GDPR).

This Privacy Policy applies to every person who uses the Services, whether as a visitor, a paying customer, or a reviewer.

We encourage you to read this Policy in full so that you understand how your personal data is handled and what rights you have.

We rely on the accuracy of the personal data you provide, so please ensure the information we hold is kept current.

Should any of your details change, please notify us so that our records can be updated accordingly.

Data Controller. Company acts as the controller of your personal data, meaning it determines the purposes and means of processing.

Company does not oversee how independent reviewers use personal data once it has been shared with them, and cannot guarantee confidentiality in those circumstances.

By using the Services, you accept that processing your content may require involvement from third-party technology providers and independent reviewers.

If you have any questions about this Privacy Policy or the way we handle your data, please contact us at [support@linguent.com](mailto:support@linguent.com)

## 2. Scope

This Privacy Policy covers all personal data we process in the course of providing the Services, including data collected when you visit the Website or use any features of the platform.

For the purposes of this Policy:

“Personal data” means any information relating to an identified or identifiable individual. This does not include data where the identity has been removed (anonymous data).

“Processing” encompasses any operation carried out on personal data, whether automated or manual, including collection, recording, use, storage, disclosure, and erasure.

## 3. Information we collect

We collect and process the following types of personal data, depending on how you interact with us:

- Identity Data: your first and last name;
- Contact Data: your email address and billing information;
- Account Data: your chosen username, password (held in encrypted or hashed form), and account settings;
- Transaction Data: records of services purchased or delivered, bids submitted, pricing information, and payment status (handled via third-party payment processors);
- Usage Data: data about your interactions with the Website and Services, such as pages visited, features accessed, session timestamps, and referral URLs;
- Technical Data: your IP address, login records, browser type and version, time zone, approximate location, operating system, device type, and related technical identifiers;
- Communication Data: the contents of messages exchanged between users on the platform or sent to our support team;
- Content Data: text, documents, or any other material you upload or submit through the Services, including items sent for translation or review;
- Marketing and Communications Data: your preferences regarding receiving promotional communications from us.

**Special Categories of Data.** We do not deliberately seek to collect sensitive categories of personal data, such as information about health, religion, or political views. Nevertheless, you acknowledge that documents submitted for translation or review may incidentally contain such information.

It is your sole responsibility to confirm that you hold the appropriate rights and legal justification for submitting any such data to the platform.

#### **4. Purposes for Processing**

We only collect and process personal data where a valid legal basis exists under applicable data protection law. Processing may be carried out for the following purposes:

- to set up, administer, and maintain user accounts and confirm the identity of users;
- to deliver and manage the Services, including handling submitted content and coordinating translation and review work between users and independent reviewers;
- to handle payments and manage financial transactions related to the Services;
- to facilitate communication between users and reviewers, and to deliver effective customer support;
- to meet our legal, regulatory, accounting, and tax compliance obligations;
- to protect the integrity and security of the platform, detect and prevent fraud, misuse, or unauthorised access, and safeguard our systems and users;
- to monitor how the Services are used and to improve the performance, features, and overall quality of the platform;
- to send you operational communications, including service updates, account notifications, and administrative information;
- where you have given us consent to do so, to contact you with promotional information about our Services — with the ability to withdraw that consent at any point.

#### **5. Legal Bases (UK/EU GDPR)**

All personal data processing is carried out in accordance with the UK General Data Protection Regulation (UK GDPR) and, where relevant, the EU General Data Protection Regulation (EU GDPR).

The legal basis we rely on varies depending on the specific activity. Under Article 6 of the UK GDPR / EU GDPR, we may rely on one or more of the following:

**(a) Contract**

Processing is lawful where it is required to fulfil a contract with you or to take preparatory steps at your request before entering into one. This covers account creation and management, delivery of the Services (including content processing and coordination with independent reviewers), payment handling, and customer support.

**(b) Legal Obligation**

We process personal data where doing so is required to comply with a legal obligation binding on us, such as obligations relating to accounting, taxation, anti-fraud measures, and regulatory reporting.

**(c) Legitimate Interests**

We may process personal data where we have a legitimate interest in doing so, provided that this interest is not outweighed by your rights and freedoms.

The legitimate interests we pursue include:

- operating and maintaining the Platform;
- facilitating interactions between users and translators;
- maintaining the security of the Platform and preventing fraud, misuse or unauthorised access;
- improving and developing our Services;
- analysing usage of the Platform;
- communicating with users regarding service-related matters.

**(d) Consent**

In cases where law requires it, we process personal data only with your consent — for instance, when sending you marketing materials.

You may withdraw your consent at any time without affecting the lawfulness of processing that occurred prior to withdrawal.

**(e) Your Rights**

Where legitimate interests form our legal basis for processing, you retain the right to object to that processing under applicable data protection legislation.

## **6. Payments & Financial Data**

Payment transactions are handled by third-party payment processors. We do not retain full card numbers or other sensitive payment credentials on our own systems.

We may receive summary transaction data from these providers — such as payment status, amounts, and timestamps — for purposes including financial reconciliation, accounting, support, and fraud prevention.

Any payment processing carried out by third-party providers is governed by their own applicable terms and privacy policies.

## **7. Cookies & Tracking**

We make use of cookies and comparable technologies — such as tracking pixels and analytics tools — to run and enhance the Services. These are used to store user preferences, maintain active sessions, and analyse how the platform is used.

Cookies may be set either by us directly or by third-party providers working on our behalf.

Where the law requires it, we will only deploy non-essential cookies after obtaining your consent.

You may adjust or disable cookie settings at any time through your browser or the cookie management tool available on the Website.

Further details are available in our Cookie Policy.

## **8. Analytics and Marketing**

We may employ analytics solutions to gain insight into how the Services are used, track platform performance, and drive improvements to functionality.

Subject to your consent where required, we may use cookies and similar technologies to serve targeted advertising or marketing content, including retargeting campaigns.

We will only send marketing messages where you have consented or where applicable law otherwise permits. You can unsubscribe from marketing communications at any time.

Cookie preferences can be managed through your browser settings or the consent tool on the Website.

## **9. Data Sharing and Processors**

Personal data may be disclosed to the following categories of recipients, as necessary:

- Processors and service providers: We work with carefully selected third-party suppliers to support our operations, including web hosting, payment processing, analytics, email communications, and customer care. These parties process personal data strictly on our behalf and under our instructions, bound by appropriate contractual terms and security obligations.
- Independent reviewers: When you submit content for translation or review, the relevant content and associated data may be passed to independent reviewers to fulfil the request. These individuals process personal data in their own right and are independently responsible for compliance with applicable data protection requirements.
- Technology partners: Your content and associated data may be sent to third-party machine translation providers to generate or support translations, where required.
- Authorities and regulators: We may disclose personal data to competent authorities where required by law or where we have reasonable grounds to believe disclosure is necessary to satisfy a legal obligation, protect our rights, address fraud or misuse, or safeguard user or public safety.

By using the Services, you accept that such disclosures are an inherent part of how we operate.

We never sell your personal data to any third party.

## **10. International Transfers**

In the course of providing the Services, your personal data may be transferred to and processed in countries outside the United Kingdom or the European Economic Area (EEA), particularly where we rely on third-party service providers or technologies.

Where such transfers occur, we ensure that appropriate safeguards are in place to protect your personal data in accordance with applicable data protection laws. These safeguards may include adequacy decisions, the use of UK and/or EU Standard Contractual Clauses, and, where necessary, additional technical and organisational measures.

By accessing the Services, you acknowledge that your personal data may be transferred to third parties operating outside the UK or EEA — including our service providers and technology partners — for the purposes set out in this Privacy Policy.

## **11. Data Retention**

We hold personal data only for as long as required to achieve the purposes for which it was gathered, including delivering the Services, satisfying legal, accounting, and regulatory obligations, resolving any disputes, and enforcing our agreements.

How long we retain data depends on its nature and the reasons for which it is processed.

When setting retention timescales, we take into account factors such as the sensitivity of the data, the risk of harm from its unauthorised use or exposure, and any statutory requirements that apply.

Once personal data is no longer needed, we will dispose of it securely or anonymise it in accordance with applicable legislation.

## **12. Your Rights**

Under applicable data protection law, you are entitled to exercise the following rights with respect to your personal data:

### Right of access

You may ask us to confirm whether we hold or process your personal data, and if so, to provide you with a copy of that data together with information about how it is being used.

### Right to rectification

You may request that any inaccurate data we hold about you be corrected, or that incomplete records be completed.

### Right to erasure

In certain circumstances — such as where the data is no longer needed for the original purpose or where consent has been withdrawn — you may ask us to delete your personal data.

### Right to restriction of Processing

In specific situations, such as where you dispute the accuracy of the data or object to how we are using it, you may ask us to temporarily limit what we do with your personal data.

### Right to data portability

Where our processing is based on consent or a contract and conducted by automated means, you have the right to receive your personal data in a structured, machine-readable format and, where technically feasible, to have it transferred directly to another data controller.

### Right to object

You may object to our processing of your personal data where we rely on legitimate interests as our legal basis. You also have an unconditional right to object to processing for direct marketing purposes.

### Right to withdraw consent

If we are relying on your consent as the basis for processing, you may withdraw that consent at any time. This will not render unlawful any processing that occurred prior to your withdrawal.

### Right to Complaints

You have the right to lodge a complaint with a competent data protection authority if you believe that our processing of your personal data infringes applicable data protection laws. In the UK, this is the Information Commissioner's Office (ICO).

To exercise any of the above rights, please contact us at [support@linguent.com](mailto:support@linguent.com). We may need to verify your identity before responding to your request.

### **13. Children's Privacy**

The Services are intended for adults and are not directed at anyone under the age of 18. We do not knowingly gather personal data from minors.

Should we discover that personal data has been collected from a person under 18 without appropriate authorisation, we will act promptly to delete that information.

If you have reason to believe that a minor has submitted personal data to us, please notify us at [support@linguent.com](mailto:support@linguent.com) so that we can investigate and take appropriate action.

### **14. Security**

We apply appropriate technical and organisational safeguards to protect personal data from unauthorised access, accidental loss, or misuse. That said, no system of transmission or storage can be entirely secure, and we are unable to guarantee absolute protection.

### **15. Automated Decisions**

We do not carry out automated decision-making that produces decisions with legal or similarly significant consequences without human oversight. Should we introduce such processes in the future, we will provide you with meaningful information about how they work and your associated rights, as required under applicable law.

### **16. Third-Party Links**

The Website may include links to external websites or services that are not operated by us. We have no control over and accept no responsibility for the content or privacy practices of such sites. We recommend reviewing the privacy policies of any third-party site before submitting personal data.

### **17. Changes to this Policy**

We reserve the right to update this Privacy Policy periodically. The date shown at the top of this document reflects the most recent revision. Continuing to use the Services after an updated Privacy Policy takes effect will be taken as acceptance of the changes.

### **18. Complaints & Supervisory Authority**

If you have a concern or complaint regarding how we handle your personal data, we encourage you to contact us in the first instance. You may also have the right to lodge a complaint with your local data protection supervisory authority. In England, this is the Information Commissioner's Office (ICO).

The ICO's address:

Information Commissioner's Office

Wycliffe House  
Water Lane  
Wilmslow Cheshire  
SK9 5AF  
Helpline number: 0303 123 1113  
Website: <https://www.ico.org.uk/make-a-complaint>

**19. How to Contact Us**

You can reach our team by email at: [support@linguent.com](mailto:support@linguent.com)

GALAXY MOTION LTD (company number 15634914)

33 St Leonard's Road, Hull, England, HU5 1BF