

# CRAIG Privacy Policy

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## 1. Introduction

This Privacy Policy explains how All in Translations Ltd ("CRAIG," "we," "us," or "our") collects, uses, stores, and protects personal data when you use our translation platform (the "Service"). It is intended to give you a clear and accurate picture of what happens to your data from the moment you submit a translation request to the moment your files are deleted.

This Privacy Policy is issued in accordance with Regulation (EU) 2016/679 (the "GDPR") and applicable national data protection laws.

## 2. Who Is Responsible for Your Data

CRAIG acts as the **data controller** for account and platform usage data, and generally as a **data processor** on behalf of the client/organisation that submits content for translation, where that content contains personal data belonging to third parties (for example, names appearing in a document being translated). Where CRAIG acts as a processor, the terms of our Data Processing Agreement with that client govern the processing of such third-party personal data, and this Privacy Policy supplements those terms with respect to transparency.

## 3. What Personal Data We Collect

We collect the following categories of personal data:

**a) Account and identification data** Name, business email address, company name, role, login credentials, and similar identifiers needed to create and manage your account on the CRAIG portal.

**b) Translation request data** The files and content you upload for translation, together with associated metadata such as file name, file type, source and target language, project instructions, and submission timestamps. Uploaded content may itself contain personal data (for example, if a document being translated names individuals); we process such data strictly to deliver the translation.

**c) Technical and usage data** IP address, browser type, device identifiers, log-in activity, and similar data automatically generated through your use of the CRAIG portal, used for security, troubleshooting, and service improvement.

**d) Communications data** Information you provide when contacting us for support, including the content of your enquiry.

We do not knowingly collect special categories of personal data (Art. 9 GDPR) and ask that you avoid including such data in files submitted for translation unless strictly necessary and lawfully justified.

## 4. How the Translation Process Works (and What It Means for Your Data)

To help you understand exactly where your data goes, here is a plain-language description of the translation workflow:

1. **Submission** – You upload files for translation through the CRAIG portal.
2. **Secure storage** – The files are stored in a secure cloud storage environment dedicated to CRAIG.
3. **Workflow processing** – An internal automated workflow system picks up your request and coordinates the steps below.
4. **Translation project creation** – A project is created in our translation management system, and your files are processed and segmented (e.g. broken into sentences/units) to enable efficient translation.
5. **AI-assisted translation** – The segmented content is routed through an AI orchestration layer, which retrieves any client-, language-, or content-specific instructions configured for your account, and then submits the content to a third-party large language model (LLM) provider for translation. More than one LLM provider may be used depending on language, content type, or operational needs.
6. **Return of results** – Once translation is complete, the translated files are retrieved by our workflow system and uploaded back into secure storage.
7. **Delivery** – You are notified and can view/download the completed translation through the CRAIG portal.
8. **Deletion** – Files (source and translated) are automatically and permanently deleted from our storage environment **90 days** after the translation is completed, unless a different retention period is required by law or agreed with you (see Section 7).

At each of these stages, only the data necessary to perform the relevant function is processed, and access is restricted to systems and personnel that need it to deliver the Service.

## 5. Categories of Recipients

We do not sell your personal data. We share personal data only with the following categories of recipients, each acting under contractual data protection obligations consistent with Art. 28 GDPR:

- **Website and account hosting provider** – hosts the CRAIG portal and manages account access.
- **Cloud storage provider** – stores uploaded and translated files during the active processing and retention period.
- **Workflow automation provider** – orchestrates the steps of the translation process between systems.

- **Translation management system provider** – manages translation projects and segments content for translation.
- **AI orchestration/prompt management provider** – manages the instructions and context applied to translation requests.
- **AI/LLM providers** – process content to generate the translated output. One or more providers may be used, selected based on language pair, content type, or service availability.
- **Professional advisers, auditors, or authorities** – where necessary to comply with legal obligations or protect our legal rights.

## 6. International Data Transfers

Some of the recipients listed in Section 5 may process data outside the European Economic Area (EEA), including in the United States. Where this occurs, we ensure an adequate level of protection through one or more of the following safeguards:

- An adequacy decision issued by the European Commission for the relevant country; or
- Standard Contractual Clauses (SCCs) approved by the European Commission, together with supplementary technical and organisational measures where required; or
- Another valid transfer mechanism recognised under Chapter V of the GDPR.

You may request further information about the safeguards applicable to a specific transfer by contacting us.

## 7. Retention of Data

- **Uploaded and translated files:** retained only for the duration of processing and for **90 days** after the translation is marked complete, after which they are automatically and permanently deleted from our systems, unless a longer period is required by law, requested by you, or necessary to resolve a dispute.
- **Account data:** retained for as long as your account is active, and for a reasonable period afterward to comply with legal, accounting, or contractual obligations.
- **Technical/log data:** retained for a limited period necessary for security and troubleshooting purposes, typically no longer than [insert period, e.g. 12 months].

## 8. Legal Bases for Processing

We process personal data on the following legal bases under Art. 6 GDPR:

- **Performance of a contract** (Art. 6(1)(b)) – to create your account and deliver the translation service you request.
- **Legitimate interests** (Art. 6(1)(f)) – to maintain the security, integrity, and performance of the Service, and to prevent fraud or misuse.

- **Legal obligation** (Art. 6(1)(c)) – where retention or disclosure is required by applicable law.
- **Consent** (Art. 6(1)(a)) – where applicable, for example for optional communications, and which can be withdrawn at any time.

Where CRAIG processes personal data contained within client-submitted content on behalf of a client (as a processor), the legal basis for that underlying processing is determined by the client as controller.

## 9. Security Measures

We take the security of personal data seriously and have implemented technical and organisational measures appropriate to the risk, in line with **Article 32 GDPR**. These measures include, among others:

- Encryption of personal data in transit and, where appropriate, at rest;
- Access controls ensuring that personal data is accessible only to authorised personnel and systems on a need-to-know basis;
- Regular testing, assessment, and evaluation of the effectiveness of our technical and organisational measures;
- Measures to ensure the ongoing confidentiality, integrity, availability, and resilience of our processing systems and services;
- The ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- Contractual security and confidentiality obligations imposed on all parties involved in processing personal data on our behalf, as referenced in Section 5.

These measures are reviewed periodically and updated as necessary to reflect evolving risks and best practice.

## 10. Your Rights

Subject to applicable conditions and exceptions under the GDPR, you have the right to:

- **Access** the personal data we hold about you;
- **Rectify** inaccurate or incomplete data;
- **Erase** your data in certain circumstances;
- **Restrict** processing in certain circumstances;
- **Object** to processing based on legitimate interests;
- **Data portability**, where technically feasible;
- **Withdraw consent** at any time, where processing is based on consent;
- **Lodge a complaint** with your local data protection supervisory authority.

Where personal data within submitted content belongs to a third party and CRAIG acts as a processor, such requests should generally be directed to the relevant controller (your organisation), who will coordinate with us as needed.

To exercise your rights, please contact us using the details in Section 11.

## **11. Contact Us**

If you have questions about this Privacy Policy or how your data is handled, please contact:

[legal@revpanda.com](mailto:legal@revpanda.com)

You also have the right to lodge a complaint with the data protection supervisory authority in your country of residence or where the alleged infringement occurred.

## **12. Changes to This Policy**

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or for other operational reasons. Material changes will be communicated to you through the CRAIG portal or by email before they take effect. The "Last updated" date at the top of this policy indicates when it was last revised.