

LIONBRIDGE



GUIDE TO PRIVACY AND SECURITY AT LIONBRIDGE



PRIVACY AND SECURITY IN LOCALIZATION

Lionbridge understands the importance of keeping data secure under any circumstance. Our privacy and security programs ensure that any data received from our customers is protected and all regional compliance requirements are met. Our drive to preserve the trust of our customers has led us to become ISO 27001 and 27701 certified becoming the first Languages Services Provider (LSP) to do so.

Want to know what else makes Lionbridge's privacy and security protocols exceptional? Find out inside.

OUR GENERAL PRIVACY PHILOSOPHY

Lionbridge provides a wide range of services, including translation, localization, live interpretation and product testing. Generally, we provide services under a services agreement and related statements of work or similar documentation.

With few exceptions, Lionbridge's services do not require or entail the processing of personal data. Lionbridge recommends that the customer should limit the transfer of any personal data to Lionbridge, other than the business contact information that is needed to perform the services.

That said, as a service provider operating in regions all around the world, Lionbridge readily acknowledges our privacy and data protection obligations and maintains a reasonable compliance program to ensure the protection of all data received from Lionbridge customers.

We have built our program in a manner consistent with Europe's General Data Protection Regulation (GDPR) and often use that framework, including the defined terms provided in the GDPR, to communicate our commitments.

The Lionbridge Trust Team

Lionbridge has dedicated security and privacy teams, led by our Chief Trust Officer, with a focus on protecting Lionbridge's digital and physical environment. The ability to process information on behalf of our customers is part of the lifeblood of Lionbridge, and security, privacy and compliance are the underpinning foundations of trust in this information-centric world. Our mission is to earn and preserve the trust of our customers.

We recognize that there are regions that impose stricter privacy and compliance requirements for businesses. To meet these differing standards, we have created a Global Privacy Program led by our Data Protection Officer based in Ireland—this program ensures Lionbridge meets our regulatory commitments across all regions in which we offer services.

Lionbridge as a Data Processor

Lionbridge acts as a Data Processor when we offer services to our customers, meaning that information is only processed by instructions of a customer (Data Controller), and only for the specific purpose agreed upon between Lionbridge and the customer.

There is no further processing for other purposes, and Lionbridge does not sell information under any circumstances.

Where is Lionbridge Data Stored?

For our services using Freeway—our online service delivery platform—the data is primarily hosted in Lionbridge Equinox data center, located in the states of Massachusetts and New York in the United States. In addition to our own certifications, the data center has the following certifications and independent assessments: NIST 800-53/FISMA; SOC 1 Type II; PCI-DSS; SOC 2 Type II; ISO 27001. Services utilizing GeoFluent—our omnichannel virtual translation and interpretation tool—are processed in Microsoft's Azure Cloud. GeoFluent does not send data to Lionbridge data centers—it is deployed and works completely in the Microsoft Cloud. There are also limited services where data is processed and stored locally in Switzerland.

How Does Lionbridge Transfer Data from the EU to a Third Country?

With few exceptions, Lionbridge services do not require or entail the processing of personal data. Lionbridge adheres to the EU GDPR, including the requirements covered for "Transfers subject to appropriate safeguards." Lionbridge adopted the EU Standard Contractual Clauses (Processors) as legitimate basis for the transfer of information to a third country in compliance with Art. 46 GDPR section 2(c), with respect to the transfer of Personal Data from the European Union to a third country (e.g., the United States).

Is Lionbridge PIPL Compliant?

What is PIPL?

The China Personal Information Protection Law (PIPL) is a new data privacy policy enacted in China. Like the GDPR in Europe, PIPL aims to protect personal information and applies to any organizations or individuals who handle personally identifiable information (PII) in China.

PIPL additionally holds companies accountable for intentionally or unintentionally releasing information to third parties. Lionbridge is PIPL ready and able to assist you with PIPL-compliant localization.

PIPL applies to the processing of the personal information of people within China, and to the activities carried out outside of China to process the personal information of people within China under the following circumstances:

- Where the purpose is to provide products or services to people in China
- Where the purpose is to analyze and evaluate the activities of people in China
- Other circumstances provided by laws and administrative regulations

What is personal information under PIPL and how is it processed?

Under PIPL, personal information refers to various kinds of information related to identified or identifiable natural persons recorded by electronic or other means, excluding information processed anonymously and including financial accounts. Processing personal information includes the collection, storage, use, processing, transmission, publication and erasure of personal information.

How does Lionbridge comply with PIPL?

One key difference between PIPL and the EU GDPR and the Brazilian LGPD is that the PIPL does not allow the processing of personal information based on a legitimate interest, unlike the EU GDPR and the Brazilian LGPD.

Lionbridge is primarily an “Entrusted Party” when offering services to its customers, meaning that information is only processed by instructions of a customer (Personal Information Processing Entity), and only for the specific purpose agreed upon between Lionbridge and the customer.

Lionbridge relies on consent and necessity for the performance of a contract to process business contact information that is needed to perform the services. Lionbridge offers our services with technology that is not publicly accessible. To access these tools, registration is necessary, which is reviewed and approved by Lionbridge.

This means that only individuals who have a legitimate reason and have agreed to our terms of use or have a business agreement with Lionbridge would be granted access to those tools. We only process information that is required to provide our services to customers, and only for the purpose that is clearly specified in a service agreement.

Additionally, we have implemented technical and organizational measures in line with ISO 27001:2013 and ISO 27701:2019, including all applicable security and privacy controls outlined in these international standards.

Lionbridge will assess and implement any additional requirements from the Cyberspace Administration of China regarding cross-border data transfers, and further guidance in other topics.

Is Lionbridge LGPD Compliant?

The Brazil General Data Protection Law, or LGPD (Lei Geral de Proteção de Dados Pessoais), became enforceable in August 2021. Lionbridge has put technical, organizational and security controls in place to ensure compliance with the LGPD, including the appointment of a Data Protection Officer responsible for privacy compliance in Brazil.



What Makes Lionbridge Different?

Lionbridge is the first Language Services Provider to receive ISO 27701:2019 certification, emphasizing our commitment to customer data protection.

We wanted to go beyond our ISO 27001:2013 certification because ISO 27701:2019 compliance certifies a company's full data lifecycle, going beyond data storage and including personal data. As a leading global translation company, Lionbridge handles customer data and intellectual property daily. We needed to ensure our customers trust our information processes, which has prompted us to go above and beyond in data security practices.



How Does Lionbridge Guarantee Data Subject Rights?

Lionbridge has policies and processes in place to guarantee the data subject rights granted to them by some laws and regulations (e.g., access, correction, deletion, portability, restriction of processing).

How Does Lionbridge Respond to Privacy-Related Incidents?

Lionbridge has put in place numerous protocols for managing privacy and security-related incidents. One of these protocols includes proactive monitoring of systems and data. If a potential security or privacy incident is detected, the issue is investigated and affected customers, individuals and authorities are notified based on regulatory and customer requirements as soon as reasonably possible. Lionbridge always works with our customers to implement any specific requirements for that account. Lionbridge has an incident response plan for managing privacy and security-related incidents, including notice to customers.

What Training Do Lionbridge Personnel Receive?

All Lionbridge employees receive security and privacy training upon hire and quarterly thereafter. Employees acknowledge and sign Lionbridge's internal security and


privacy policies, as well as a Non-Disclosure Agreements (NDAs). Lionbridge translations are performed by contracted translators and freelancers. These individuals are located across the globe, and they also need to accept and agree with Lionbridge's Privacy Policy and Data Protection Addendum.

How is Security Managed Within Lionbridge?

Information technology systems are an integral part of Lionbridge. We have made a substantial investment in human and financial resources to create and maintain these systems, and we place great importance on protecting these systems from internal misuse and external threats.

Lionbridge has implemented clear roles and responsibilities for individuals with access to customer content and data. The strictest user access levels are implemented, which means that access to the information is only granted to the required individuals who will be participating in that specific project. All access (including privileged access) is logged, and privileged access is reviewed on a regular basis by our security team.

The customers' data and content are encrypted in transmission and at rest. Lionbridge uses AES-256 encryption at the volume level and TLS for browser-based communication.



We've earned our customers' trust by establishing dedicated security and privacy teams and adhering to high-standard compliance programs for protecting customer data. Our experts ensure the security of your information, no matter where you're located.

For privacy and security questions, contact Lionbridge's Trust Team at data-privacy@lionbridge.com.



About Lionbridge

Lionbridge partners with brands to break barriers and build bridges all over the world. For 25 years, we have helped companies connect with their global customers and employees by delivering translation and localization solutions in 350+ languages. Through our world-class platform, we orchestrate a network of passionate experts across the globe who partner with brands to create culturally rich experiences. Relentless in our love of linguistics, we use the best of human and machine intelligence to forge understanding that resonates with our customers' customers. Based in Waltham, Massachusetts, Lionbridge maintains solution centers in 23 countries.



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