

PRIVACY POLICY

Last updated: 18 May 2026.

1. Introduction

This Privacy Policy explains how **GRAVITY OPERATIONS LTD** (“Gravity”, “we”, “us” or “our”), a company incorporated in England and Wales with company number 15633657 and registered office at 55 Riding House Street, London, England, W1W 7EE, collects, uses, shares and protects personal data when you use our website located at <https://tranzilai.com/> (the “Website”) and related services (the “Services”).

We respect your privacy and are committed to protecting your personal data in accordance with applicable data protection laws, including the UK General Data Protection Regulation (UK GDPR).

This Privacy Policy applies to all users of the Services, including visitors, customers and translators.

Please read this Policy carefully to understand how we handle your personal data and your rights in relation to it.

It is important that the personal data we hold about you is accurate and up to date.

Please keep us informed if your personal data changes during your relationship with us.

Controller. Gravity is the controller of your personal data and is responsible for determining how and why your personal data is processed.

We do not control the use of personal data by independent translators and cannot guarantee the confidentiality of such data once shared.

You acknowledge that processing of your content may involve third-party service providers and independent translators as necessary to provide the Services.

If you have any questions about this Privacy Policy or our data practices, you may contact us at support@tranzilai.com

2. Scope

This Privacy Policy applies to personal data processed by us in connection with your use of the Services, including when you access or use our Website and related platform functionalities.

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” means any operation or set of operations performed on personal data, whether or not by automated means, including collection, use, storage, disclosure or deletion.

3. Information we collect

We may collect and process the following categories of personal data:

- Identity Data: first name, last name;

- Contact Data: email address and billing details;
- Account Data: username, password (stored in encrypted or hashed form) and account preferences;
- Transaction Data: details of services requested or provided, offers submitted, pricing and payment status (processed via third-party payment providers);
- Usage Data: information about how you use the Website and Services, including pages viewed, features used, timestamps and referring URLs;
- Technical Data: IP address, login data, browser type and version, time zone setting, location, operating system and platform, and other technology on the devices you use to access the Website;
- Communication Data: information contained in communications between users on the Platform or with our support team;
- Content Data: any text, documents or other materials that you submit, upload or process through the Services, including content submitted for translation or review;
- Marketing and Communications Data: your preferences in receiving marketing from us and your communication preferences.

Special Categories of Data. We do not intentionally collect special categories of personal data (such as information relating to health, religion, political opinions or other sensitive matters). However, you acknowledge that Content Data submitted by you for translation or review may contain such information.

You are solely responsible for ensuring that you have the necessary rights and legal basis to submit such data for processing.

4. Purposes for Processing

We collect and process personal data only where we have a lawful basis to do so under applicable data protection laws. We may process personal data for the following purposes:

- to create, manage and maintain user accounts and verify user identity;
- to provide and operate the Services, including processing submitted content and facilitating translation services between users and independent translators;
- to process payments and manage transactions in connection with the Services;
- to enable communication between users and translators, and to provide customer support;
- to comply with legal, regulatory, accounting and tax obligations;
- to maintain the security of the Platform, prevent fraud, misuse or unauthorised access, and protect our systems and users;
- to analyse usage of the Services and improve the performance, functionality and quality of the Platform;
- to send service-related communications, including updates, notifications and administrative messages;
- where you have provided consent, to send marketing communications about our Services, with the option to withdraw consent at any time.

5. Legal Bases (UK/EU GDPR)

We process personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and, where applicable, the EU General Data Protection Regulation (EU GDPR).

Depending on the nature and purpose of the processing, we rely on one or more of the following legal bases under Article 6 of the UK GDPR / EU GDPR:

(a) Contract

We process personal data where this is necessary for the performance of a contract with you or to take steps at your request prior to entering into a contract. This includes creating and managing user accounts, providing the Services (including processing submitted content and facilitating translation services between users and independent translators), processing payments and providing customer support.

(b) Legal Obligation

We process personal data where this is necessary for compliance with a legal obligation to which we are subject, including accounting, tax, anti-fraud and regulatory requirements.

(c) Legitimate Interests

We process personal data where it is necessary for our legitimate interests, provided that such interests are not overridden by your fundamental rights and freedoms.

Our legitimate interests 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

Where required by law, we process personal data on the basis of your consent. This includes, for example, sending marketing communications.

You have the right to withdraw your consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before such withdrawal.

(e) Your Rights

Where we rely on legitimate interests as a legal basis, you have the right to object to such processing in accordance with applicable data protection laws.

6. Payments & Financial Data

Payments are processed by third-party payment service providers. We do not store full payment card details or other sensitive payment credentials on our systems.

We may receive limited transaction-related information from such providers, including transaction status, amount and timestamps, for the purposes of reconciliation, accounting, customer support and fraud prevention.

All payment processing is subject to the terms and conditions and privacy policies of the relevant payment service providers.

7. Cookies & Tracking

We use cookies and similar technologies (such as pixels and analytics tools) to operate and improve the Services, including to remember user preferences, maintain sessions and analyse usage of the Platform.

Cookies may be placed by us or by third-party service providers acting on our behalf.

Where required by applicable law, non-essential cookies will only be used with your consent.

You can manage or disable cookies at any time through your browser settings or via the cookie preferences manager provided on the Website.

For more information, please see our Cookie Policy.

8. Analytics and Marketing

We may use analytics tools to understand how the Services are used, monitor performance and improve the functionality of the Platform.

Where applicable, we may use cookies and similar technologies to deliver consent-based advertising or marketing communications, including remarketing campaigns.

Marketing communications will only be sent where you have provided your consent or where otherwise permitted by applicable law. You may opt out of marketing communications at any time.

You can manage your cookie preferences through your browser settings or via the cookie consent manager available on the Website.

9. Data Sharing and Processors

We may share personal data with the following categories of recipients:

- Service providers (processors): We engage trusted third-party service providers to support the operation of the Services, including hosting, payment processing, analytics, email delivery and customer support. These providers process personal data on our behalf and under our instructions, subject to appropriate contractual and security safeguards.
- Translators: Where you submit content for translation or review, your content and associated data may be shared with independent translators in order to provide the requested services. Such translators process personal data as independent parties and are responsible for their own compliance with applicable data protection laws.
- Third-party technology providers: Where applicable, your content and related data may be transmitted to third-party translation providers (such as machine translation services) in order to generate or assist with translations.
- Legal and regulatory authorities: We may disclose personal data where required to do so by law or where we reasonably believe that such action is necessary to comply with legal obligations, protect our rights, prevent fraud or misuse, or protect the safety of our users or the public.

You acknowledge that such sharing is necessary for the provision of the Services.

We do not sell your personal data to third parties.

10. International Transfers

Your personal data may be transferred to, and processed in, countries outside the United Kingdom or the European Economic Area (EEA), including where we use 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 using the Services, you acknowledge that your personal data may be transferred to third parties located outside the UK or EEA, including service providers and technology partners, for the purposes described in this Privacy Policy.

11. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including to provide the Services, comply with legal, accounting and regulatory obligations, resolve disputes and enforce our agreements.

Retention periods may vary depending on the type of personal data and the purposes for which it is processed.

In determining appropriate retention periods, we consider factors such as the nature and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure, and applicable legal requirements.

Where personal data is no longer required, we will securely delete or anonymise it in accordance with applicable laws.

12. Your Rights

Subject to applicable law, you have the following rights in relation to your personal data:

Right of access

You have the right to request confirmation as to whether we process your personal data and, where we do, to request access to that personal data and information about how it is used.

Right to rectification

You have the right to request the correction of inaccurate personal data or the completion of incomplete personal data that we hold about you.

Right to erasure

You have the right to request the deletion of your personal data in certain circumstances, for example where the data is no longer necessary for the purposes for which it was collected or where processing was based on consent and that consent has been withdrawn.

Right to restriction of Processing

You have the right to request that we restrict the processing of your personal data in certain circumstances, such as where you contest the accuracy of the data or object to its processing.

Right to data portability

Where processing is based on consent or on the performance of a contract and carried out by automated means, you have the right to receive your personal data in a structured, commonly used and machine-readable format and to request that it be transferred to another controller where technically feasible.

Right to object

You have the right to object to the processing of your personal data where processing is based on our legitimate interests. You also have the right to object at any time to the processing of your personal data for direct marketing purposes.

Right to withdraw consent

Where we rely on your consent to process personal data, you have the right to withdraw that consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before such withdrawal.

Right to lodge a complaint

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 rights, please contact us at support@tranzilai.com. We may need to verify your identity before responding to your request.

13. Children's Privacy

Our Services are not directed to individuals under the age of 18, and we do not knowingly collect personal data from such individuals.

If we become aware that personal data has been collected from a child without appropriate consent, we will take steps to delete such information without undue delay.

If you believe that a child has provided us with personal data, please contact us at support@tranzilai.com so that we can investigate and take appropriate action.

14. Security

We implement technical and organizational measures designed to protect personal data against unauthorized access, loss, or misuse. However, no method of transmission or storage is completely secure, and we cannot guarantee absolute security.

15. Automated Decisions

We do not engage in automated decision-making producing legal or similarly significant effects without human involvement. If we introduce such processes, we will provide meaningful information about the logic involved and your rights, as required by law.

16. Third-Party Links

Our website may contain links to third-party websites and services not operated by us. We are not responsible for their content or privacy practices. We encourage you to review their privacy policies before providing personal data.

17. Changes to this Policy

We may update this Privacy Policy from time to time. The "Last updated" date at the top indicates when changes were made. Your continued use of the Services after changes take effect constitutes acceptance of the updated Policy.

18. Complaints & Supervisory Authority

If you have any concerns or complaints about how we process your personal data, please contact us. 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

Email: support@tranzilai.com

GRAVITY OPERATIONS LTD (company number 15633657)

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