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Adopted 25 May 2018

Policy on Data Privacy for Clients and Contractors

1. Introduction

This Policy has been put in place by us, Link Translation Bureau Limited (“**The Company**”), in order to provide an understanding of and assurance over the way we collect, use, manage and protect **Personal Data**, in compliance with the provisions of the Data Protection Bill 2017 (“**DPB**”), the General Data Protection Regulation (“**GDPR**”) and all other applicable legislation and regulations.

We have put this policy in place because we are a Data Controller within the meaning of the DPB and GDPR. This policy supersedes all previous policies or parts of policies implemented in connection with the processing of Personal Data for clients of The Company.

2. Definitions

The following definitions shall apply throughout this Policy:

“**Controller**” means the legal person (which may be an Individual, Company or other entity) that determines the purposes and means of the processing of Personal Data.

“**DPB**” means the Data Protection Bill 2017 of the United Kingdom, or as it is subsequently enacted.

“**GDPR**” means the General Data Protection Regulation (Regulation (EU) 2016/679).

“**Individual**” means any natural person, whether living or deceased.

“**Personal Data**” means data that are capable of identifying an Individual, whether on their own or in conjunction with other data accessible to The Company.

“**Processor**” means the legal person (which may be an Individual, Company or other entity) that processes Personal Data on behalf of the Controller.

“**The Company**” means Link Translation Bureau Limited, a company registered in England under number 02889291, and any subsidiary or associated entity.

“**Your Third Party**” means a third party whose **Personal Data** you provide to us, or a third party who provides us with their **Personal Data**, in order for us to provide services to you and/or to act on your behalf.



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3. The Personal Data we collect

We collect Personal Data in order to a) provide our clients with the services that we undertake on their behalf and in order to perform any contractual obligations that exist, and b) instruct our contractors in respect of a contract for services. Any processing of Personal Data that takes place is necessary for the performance of the contract for services that exists between ourselves and our clients or our contractors, as the case may be..

The Personal Data collected will at most comprise:

- Name;
- Telephone numbers;
- Fax number;
- Email address;
- Postal address;
- Nationality;
- Gender.

Apart from the exception given below, we do not collect special category Personal Data such as information about ethnic origins, religious beliefs, criminal convictions or sexual orientation. However, when working with contractors, in order to ensure that we understand whether there are any operational constraints that may affect the deadlines to which they are able to work, we do collect medical information.

As our client or as our contractor, you are able to decline to disclose any Personal Data to us. If you exercise your right to do so, we may be unable to work with you, provide you with our services in full, or complete our contractual obligations. In exercising your right in this way, you agree that The Company is not in breach of contract with you.

4. What we do with the Personal Data collected

We use the Personal Data we collect for the purposes set out below:

4.1 Clients

Your Personal Data may be used to contact you in order to receive instructions from you and keep you updated whilst providing services to you or conducting business on your behalf;

In undertaking your instructions and acting on your behalf, we need to use your Personal Data and Your Third Party's Personal Data in order to prepare translations of the documents provided to us by you or to arrange interpreting appointments;

In undertaking your instructions and acting on your behalf, we also must from time to time instruct third parties who are native speakers of the languages into which you require documents to be translated or for which you require an interpreter, and share your and/or Your Third Party's Personal Data so that they may prepare the necessary translations or attend the interpreting assignments;



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We will not sell, distribute or lease your Personal Data and/or Your Third Party's Personal Data to third parties unless we seek and have your permission, or are required by law to do so;

We may use your Personal Data to contact you in relation to any matters impacting on our translation or interpreting services that we think may be of interest to you including news items, law updates and events, unless you tell us that you do not wish this to happen.

4.2 Contractors

Your Personal Data may be used to contact you in order to provide instructions to you and keep you updated whilst you are undertaking work in accordance with a contract for services between us.

We will use the medical information you provide to assess whether or not you are able to meet the deadlines for work that we have been requested to perform, and this may determine whether or not we contact you with a view to sub-contracting work to you.

5. The legal basis for processing information

We will process your Personal Data and Your Third Party's Personal Data only on a lawful basis, in accordance with the GDPR (or such other enactment of the DPB or any subsequent legislation that replaces or amends it).

We will process your Personal Data within the United Kingdom and elsewhere within the European Union in accordance with the basis that is set out in Paragraph 1(b) of Article 6 of the GDPR which states that processing is lawful where it is necessary:

"For the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract."

We will process Your Third Party's Personal Data within the United Kingdom and elsewhere within the European Union in accordance with the basis that is set out in Paragraph 1(a) of Article 6 of the GDPR which states that processing is lawful where:

"The data subject has given consent to the processing of his or her personal data for one or more specific purposes"

We will transfer your Personal Data and Your Third Party's Personal Data outside the European Union only under the derogation contained in Paragraph 1(a) of Article 49 of the GDPR which states that:

"The data subject has explicitly consented to the proposed transfer after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards"

When engaging with us and either a) instructing us to provide services and act on your behalf or b) agreeing to provide services to us, you accept our Terms of Business and enter into a contractual relationship under which you agree the purposes set out in this policy for which we will use your



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Personal Data and Your Third Party's Personal Data, you accept the associated risks and provide your consent that we may transfer your own Personal Data outside the European Union, and you agree that when you ask us to process Your Third Party's Personal Data, you will have obtained Your Third Party's explicit consent for us to do so and that you will have explained the associated risks to them.

6. Disclosure of Personal Data to third parties

From time to time when we have a contract to provide services to you, we will sub-contract aspects of the business you have engaged us to carry out on your behalf to a third party translator who is a native-speaker of the language into which you have requested your document to be translated or to an interpreter. This will involve the disclosure of certain of your Personal Data and of Your Third Party's Personal Data collected by us from you. When Personal Data are disclosed to a third party in this way, regardless of which country they operate in, they will handle your information confidentially and will have security measures in place that meet the requirements of relevant local laws and regulations. These local laws and regulations may confer rights and impose obligations that are less than those that apply within the United Kingdom.

By entering into this contract, you agree that we may transfer your Personal Data and Your Third Party's Personal Data to third party translators or interpreters identified by us to undertake services on your behalf, and acknowledge that this is necessary for the performance of the contract between us, or the implementation of pre-contractual measures taken at your request.

7. Our Service Providers acting as Data Processors

We use the following service provider to act as Data Processor on our behalf:

Microsoft Office 365, for processing data received by email.

We have taken the necessary steps to ensure that this service provider is compliant with all relevant Data Protection legislation and regulations.

8. Retention periods

The Company will retain your Personal Data and Your Third Party's Personal Data for the time it is necessary to do so and no longer. Our normal retention period is 12 months from the completion of the work, though in cases where the work is undertaken in connection with the provision of legal services, we may keep the Personal Data for up to 6 years.

We reserve the right to retain any papers and materials until all payments due to us have been made. Our own files remain our own property. You will have access to these files free of charge.



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9. Your rights and the rights of Your Third Party in connection with Personal Data held about you and Your Third Party

Within The Company, one of the directors is nominated to act as Data Protection Officer and any correspondence in respect of Personal Data should be directed to him or her at the following address:

The Data Protection Officer
Link Translation Bureau Limited
1 Mann Island
Liverpool
L3 1BP

You have the following rights in respect of your Personal Data held by The Company. Your Third Party has the same rights and the rights set out in 9i) to v) below apply equally to them and Personal Data that we hold about them. You or Your Third Party as the case may be will receive acknowledgement of a submitted request, which will be dealt with within one calendar month from the date we receive the request. There will be no charge for responding to such a request for Personal Data.

i. Right to Access

You have the right to request access to all Personal Data held about you by The Company.

ii. Right to Rectification

You have the right to request rectification of any inaccurate or missing Personal Data that The Company holds about you.

iii. Right to Erasure

You have the right to request erasure of all Personal Data The Company holds about you.

iv. Right to Restriction of Processing

You have the right to request The Company not to process the Personal Data that it holds about you. This right exists in the following circumstances:

- You contest the accuracy of the Personal Data and processing needs to be restricted while the accuracy is verified;
- Processing of the Personal Data is unlawful but you oppose erasure;
- We no longer need the Personal Data but you or Your Third Party need them for the establishment, exercise or defence of legal claims; or
- You object to the processing of the Personal Data on the grounds that it is not lawful or because the data are being used in connection with direct marketing.

v. Data Portability

You have the right to receive the Personal Data that The Company holds about you in a commonly used, machine-readable format. You may request that the Personal Data be given to you or to a third party.



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10. Automated decision making

You or Your Third Party will not be subject to any decision based on automatic processing of your Personal Data.

11. Security

We are committed to ensuring that your information and the information relating to Your Third Party is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures and controls to safeguard and secure the information we collect online and in person.

i. Physical Data

Physical data are stored on premises to which access is controlled by security pass. Security passes are issued only to employees and approved contractors.

ii. Electronic Data

Electronic data are protected by various technical security measures that are designed to prevent loss, damage or unauthorised disclosure and access. These measures include a fully managed centralised firewall, application controls, intrusion detection and prevention, antivirus protection and web filtering.

12. Complaints

If you or Your Third Party have a complaint in respect of the way we handle your or Your Third Party's Personal Data, as the case may be, we encourage you or them to contact us in the first instance.

If you or Your Third Party do not feel that The Company is processing Personal Data in accordance with the legal basis stated in section 5 of this Privacy Policy or you or Your Third Party feel the protection in place to secure your or their Personal Data, as the case may be, is not adequate, then you or Your Third Party have the right to make a complaint to the Information Commissioners Office (ICO), which is the governing authority for data protection in the United Kingdom.

You can make a complaint to the ICO at the following web address: <https://ico.org.uk/concerns/>

13. Governing law

This privacy policy shall be governed and construed in accordance with English law. Any dispute arising out of or in connection with our privacy policy including any question regarding its existence, validity or termination, shall be referred to and finally resolved by the courts of England and Wales.