



## **GDPR Compliance Policy for SILA Linguists® (NEXUS of SILA Limited) September 2023**

### ***Introduction***

SILA Linguists®, hereafter referred to as "We," is dedicated to the accurate, secure, lawful, and equitable management of all personal data. We fully honour the legal rights, privacy, and confidence of all individuals with whom we engage.

This policy is intended for circulation among our clients, employees, and suppliers, as well as for submission to the Information Commissioner's Office, upon request. It serves to showcase our commitment to adhere to GDPR regulations when processing personal data essential for our ongoing business operations. All members of our staff and suppliers are mandated to continuously adhere to our data protection procedures.

Operating as a Language Service Provider (LSP) based in Scotland, we offer translation, interpreting and language analysis services to a diverse clientele, including public and private sector entities, the third sector and individuals.

We function as both a controller and processor of personal data, including sensitive personal data, in the following principal contexts:

- Processing content for translation containing personal data, including sensitive information about individuals.
- Managing appointment details, including personal data, to facilitate the scheduling of interpreting assignments.
- Governing and processing personal data of our clients (including potential clients) and their personnel.
- Managing and processing personal data of our own workforce, as well as applicants seeking positions within our organisation.
- Managing and processing personal data of our suppliers, encompassing freelance translators and interpreters.

### ***Audits of Personal Data***

We conduct regular audits of personal data across all departments and maintain comprehensive records of all stored data. For each process involving personal data, the audit captures the following details:

- The nature of the supplied personal data.
- The origin and/or supplier of the personal data.
- The intended processing of the personal data and the rationale for its collection.
- The legal basis on which the personal data is processed, such as:
  - With the data subject's consent.
  - As part of a contractual agreement with the data subject.
  - As part of a contractual agreement with the data controller.
  - Due to a legal obligation requiring the processing of the personal data.

- When there is a legitimate interest justifying the processing of personal data.
- Storage location of the personal data.
- Authorised access to the personal data.
- Data retention period.
- Circumstances of third-party sharing of personal data.
- Reasons for sharing personal data with third parties.
- Feasibility of deleting personal data upon the data subject's request for erasure.

### ***Annual Review***

Personal data audits undergo annual review, and we are committed to enhancing documentation and policies in response to any concerns identified during these audits. Additionally, we incorporate procedures for handling personal data as they are identified.

### ***Assessment of Legitimate Interests***

We have conducted a thorough assessment of legitimate interests when processing personal data under this legal basis.

### ***Processing, Transfer, and Storage of Personal Data***

We ensure that all staff, subcontractors, and suppliers manage personal data securely. Detailed policies governing the processing, transfer, and storage of personal data are outlined in various dedicated documents that define the relationships between our company, clients, suppliers, and employees.

### ***Data Retention***

We guarantee that each category of personal data will not be retained beyond its documented retention period. These retention periods are documented both in our Documented Information Procedure and our personal data audits.

### ***Subject Access Requests***

We commit to promptly responding to written Subject Access Requests within one month of receipt, without charging a fee. We will authenticate the requester's identity and the validity of the request in line with the GDPR's requirements.

### ***Requests for Erasure or Right to Be Forgotten***

The GDPR grants individuals the right to have their personal data erased under certain circumstances. We pledge to promptly address verbal or written requests for erasure within one month. We will verify the requester's identity and their eligibility for requesting erasure, following internal protocols to delete relevant data, and ensuring that third-party data processors remove any shared data. In cases where the legal basis for retaining personal data is contractual or based on legal obligations, the right to be forgotten is superseded, and such data will not be erased.

### ***Breach Notification Process***

We will fulfil our GDPR obligation to report specific types of personal data breaches to the Information Commissioner's Office within 72 hours of identifying such breaches. We maintain a record of personal data breaches, irrespective of legal requirements. Should a breach pose a significant risk to the rights and freedoms of affected individuals, we will directly inform those concerned without undue delay. We will investigate whether breaches result from human error or systemic issues, taking corrective actions to prevent recurrence through improved procedures, enhanced training, or other suitable measures.

### ***Personal Data in Translated Content***

Regarding personal data present in content for translation, we act as a Data Processor. This data is also subject to further processing by contracted translators, proof-readers, and DTP typesetters. We prioritise the secure handling of this data across all levels and implement adequate technical controls to ensure its proper management throughout the translation process.

### ***Personal Data in Interpreter Bookings***

As a Data Processor, we manage personal data linked to interpreter bookings and share it with relevant contracted interpreters attending appointments. We attach great importance to secure handling at all stages, ensuring the appropriate management of personal data within the interpreter booking process.