



GDPR Compliance Policy

Introduction

Global Connections (Scotland) Limited (hereafter 'We') are committed to the accurate, safe, lawful and fair handling of all personal data. We fully respecting the legal rights, privacy and trust of everyone with whom we deal.

This policy is for distribution to our customers, employees and suppliers, and for the Information Commissioners Office, if requested, to demonstrate that we recognise our obligations to comply with the GDPR in handling personal data where it is necessary for the ongoing operation of our business. All our staff and suppliers are required to comply with our data protection processes at all times.

We are a UK-based Language Service Provider (LSP) providing translation and interpreting services to a wide customer base consisting of public and private sector organisations and members of the public. Our head office is in Glasgow.

As an LSP, we act as both controller and processor of personal data, including sensitive personal data, in the following main contexts:

- We process content for translation containing personal data, including some sensitive personal data of individuals;
- We process appointment information and details, including personal data, to organise the booking of interpreting assignments;
- We control and process personal data of our customers (including prospective customers) and their staff;
- We control and process personal data of our own staff, and those applying for positions with us;
- We control and process personal data of our suppliers, including freelance translators and interpreters.

Personal Data Audits

We undertake personal data audits within all departments and maintain maps of all data stored. For each process where personal data is handled, the audit captures the following information:

- The type of personal data supplied
- The source and/or supplier of the personal data
- How the personal data will be processed and why it is being captured
- The legal basis on which that personal data is being processed, e.g.
 - ▶ with the consent of the data subject
 - ▶ as part of a contract with the data subject
 - ▶ as part of a contract with the data controller
 - ▶ because there is a legal obligation to process the personal data
 - ▶ where there is a legitimate interest to process the personal data
- Where the personal data is stored
- Who can access the personal data
- How long the personal data will be retained
- When personal data is sent on to a third party
- Why personal data is sent on to a third party
- Whether the personal data can be deleted if the data subject exercises their right to be forgotten

Annual Review

Personal data audits are reviewed annually and we are committed to maintaining and developing documentation and policies as a result of any issues identified in the annual audits, and as further processes incorporating the handling of personal data are identified.

Legitimate Interests Assessments

We have conducted a Legitimate Interest Assessment where legitimate interest is used as the legal basis for processing personal data.

Processing, transfer and storage of personal data

We ensure that all staff, subcontractors and suppliers handle personal data securely.

Further information on our policies on the processing, transfer and storage of personal data are detailed in a number of individual documents which govern the relationship between the company and our clients, suppliers and employees.

Data retention

We will ensure that each type of personal data will be retained no longer than its documented retention period. Retention periods are documented in our Documented Information Procedure and also in our personal data audits.

Subject Access Requests

We will respond to written Subject Access Requests without undue delay, within one month of receipt, and with no fee chargeable. We will verify the identity of the requester, and that the request is valid and within the rights of the individual under the requirements of the GDPR.

Requests to be Forgotten or Right to Erasure

The GDPR provides a right for individuals to have personal data erased. The right is not absolute and only applies in certain circumstances. We will respond to a verbal or written Request to be Forgotten or Right to Erasure without undue delay, within one month. We will verify the identity of the requester and their right to request erasure before following internal procedures to delete the relevant data and ensure that any third-party processors of the data erase any data we have shared with them.

Where the legal basis of storing personal data is for contractual or legal obligation, the right to be forgotten is outweighed and in such circumstances, personal data will not be deleted.

Breach notification process

We will comply with our duty under the GDPR to report certain types of personal data breach to the Information Commissioner's Office within 72 hours of becoming aware of the breach. We will keep a record of any personal data breaches, whether or not legally required to do so.

If a breach is likely to result in a high risk to the rights and freedoms of the affected individuals, we will inform those concerned directly and without undue delay.

We will investigate if any breach was a result of human error or a systemic issue and will assess how a recurrence can be prevented – whether this is through improved procedures, additional training or other corrective actions.

Personal data in content for translation

Personal data in content for translation, is handled by us as a Data Processor and is also subject to further processing by contracted translators, proof-readers and DTP typesetters. We put great emphasis on handling this data safely and securely at all levels and have in place appropriate technical controls to ensure that all personal data in content for translation is handled appropriately throughout the translation process.

Personal data in Interpreting Bookings

We also handle personal data in relation to interpreter bookings, as a Data Processor, sharing it with relevant contracted interpreters attending an appointment. We put great emphasis on handling this data safely and securely at all levels, ensuring personal data in interpreting bookings is handled appropriately throughout the booking process.