

UK LINGUISTIC SERVICES LTD

Data Protection Policy

How we protect personal data in our interpreting, translation and transcription work

Organisation	UK Linguistic Services Ltd, registered in England and Wales, company number 08468916
Address	301 Tea Factory, 82 Wood Street, Liverpool L1 4DQ
ICO registration	ZC269695 (Information Commissioner's Office register of fee payers; registration runs to 7 October 2027)
Policy owner	Data Protection Lead, a director of the company
Contact	info@uklinguisticservices.co.uk · 0800 2425 125
Version and date	Version 2.0, 1 September 2026 (first issued March 2021 — see section 15)
Next review	September 2027, or sooner if the law or our services change
Classification	Public

1. Purpose and scope

UK Linguistic Services (UKLS) provides face-to-face, telephone and video interpreting, translation, including certified translation, and transcription to local authorities, NHS bodies, courts, police forces, solicitors, businesses and private clients. Much of that work involves personal information about the people our clients serve, and some of it is about children, health, immigration, family proceedings or criminal matters. This policy sets out how we handle that information and our own records lawfully, securely and in confidence.

The policy covers all personal data we hold or handle: our clients' contact details, information about the people our clients ask us to interpret or translate for, the records of the interpreters, translators and transcribers who work with us (our "linguists"), our staff, and visitors to our website. It applies to our directors and staff, to every linguist we engage, and to the systems and providers we use.

2. The law we follow

We comply with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Privacy and Electronic Communications Regulations for marketing and cookies. We pay the data protection fee to the Information Commissioner's Office (ICO) and are listed on its public register under reference ZC269695.

3. Our roles: controller and processor

- **Controller.** We decide how and why our own business records are used: our clients' contact and billing details, our linguists' records, our staff records, enquiries, and our website. We are responsible for this data.
- **Processor.** When a client gives us information about the people it serves, for example a booking for a family meeting, what is said during an interpreted appointment, or a document to translate, we handle it on the client's behalf and only on the client's documented instructions. The client is the controller: it decides the purpose and the lawful basis for the processing.
- **Our linguists.** The interpreters, translators and transcribers we engage are our subcontractors. When they work on a client's information they act for us, under written confidentiality terms, as our sub-processors.

4. How we apply the data protection principles

- **Lawful, fair and transparent.** We use personal data only for the reasons we have told people about, and our privacy notice explains our own processing. When we act for a client, we rely on the client's lawful basis.
- **Purpose limitation.** Client information is used only to deliver the service booked, to invoice, to handle queries and complaints, and to meet our legal obligations. It is never used for marketing, and we never sell personal data.
- **Data minimisation.** A booking needs the date, time, place, language and dialect, type of appointment and any requirements the linguist must know about. We ask clients to share a service user's name, or details of the case, only when the linguist needs them, and initials are often enough.
- **Accuracy.** We correct records promptly when we are told they are wrong, and we use qualified linguists so that what is interpreted or translated is accurate.
- **Storage limitation.** We keep personal data only as long as section 11 allows, and then delete it securely.
- **Integrity and confidentiality.** We protect personal data with the measures in section 9.
- **Accountability.** We keep a record of our processing activities, carry out data protection impact assessments for high-risk processing, train our staff, keep a breach log and review this policy every year.

5. Special category data, criminal offence data and children

Interpreting and translation for public services routinely involve special category data, such as health, ethnicity, religion and sex life, and sometimes criminal offence data. When we act for a client we rely on the client's conditions for processing under Articles 9 and 10 of the UK GDPR and Schedule 1 of the Data Protection Act 2018, and we treat everything said in an assignment, and every document we are given, as confidential by default.

When the people involved are children or adults at risk, we add the following safeguards:

- Where a client asks for it, we assign only linguists who hold a current enhanced DBS check.
- Linguists must tell us before an assignment if they know, or may know, the person or family involved, and the client can ask for a different linguist at any time.

- Linguists must not contact a service user outside the assignment, take photographs or recordings, or keep notes or copies of documents once the assignment is finished.
- Information about a child is shared with a linguist only when the assignment needs it.

6. When we act for a client

When we process personal data for a client, we:

1. process it only on the client's documented instructions, which are the booking, purchase order and contract, unless the law requires otherwise;
2. make sure that everyone who handles it, staff and linguists alike, is bound by confidentiality;
3. protect it with the security measures in section 9;
4. use only the subcontractors and providers described in section 8, under written terms, and tell clients before we change a provider that handles their data;
5. help the client respond to requests from individuals, assess risks, and meet its own obligations on security, breaches and impact assessments;
6. delete or return the client's data when the service ends, or as section 11 sets out, unless the law requires us to keep it;
7. give the client the information it needs to check that we meet these obligations.

We are happy to sign a client's own data processing agreement, or to agree written processing terms with a client that does not have one.

7. The rights of individuals

People have the right to be informed about, to access, correct and erase their personal data, to restrict or object to its use, and to data portability. For data we control, we respond to a request within one month and do not charge, except where the law allows. If we hold data for a client, we pass the request to the client within two working days and help it respond. Requests can be made to info@uklinguisticservices.co.uk or 0800 2425 125.

8. Technology providers and where data is held

We use the following providers. Each one processes data for us under its own data processing terms.

Provider	What it does for us	Where the data is held
OVHcloud (OVH SAS)	Hosts our website, client and linguist portals, booking system, video meeting application and database	France (European Economic Area)
Microsoft Azure Storage	Private storage for documents, email attachments and meeting recordings	United Kingdom (London and Cardiff regions)

Provider	What it does for us	Where the data is held
Microsoft Azure OpenAI Service	Used inside our own systems for three things: matching incoming emails to the right client or linguist record when simple rules cannot; a staff assistant that answers questions about our own booking, client and linguist records; and matching bank payments to the right invoice. Only our signed-in staff can use it, no decision about any person is taken automatically, and Microsoft does not use this data to train its models.	United Kingdom (UK South region)
Microsoft 365	Email and office software	Microsoft data centres, under Microsoft's Data Protection Addendum
Twilio	Text message notifications, and the video and audio connection for interpreting sessions held on our own meeting platform	United States, under Twilio's Data Protection Addendum
Stripe	Online card payments. We never see or store full card numbers.	United Kingdom, EEA and United States, under Stripe's data processing terms
Google Analytics	Statistics about visits to our website. It does not receive client case information.	Google data centres, under Google's data processing terms

Transfers to the European Economic Area are covered by the UK's adequacy regulations. Where a provider may process data in the United States or elsewhere outside the UK and EEA, the transfer is made under that provider's data processing terms, which provide the safeguards UK law requires for international transfers.

9. How we keep personal data secure

- All our websites, portals and the meeting platform use encrypted connections (HTTPS).
- Documents, email attachments and meeting recordings are held in private storage and can be opened only by signed-in staff.
- Staff accounts are individual and give access by role. Access is removed as soon as someone leaves.
- Card payments are handled by Stripe, so card details never reach our systems.
- Every linguist accepts written confidentiality terms that continue without time limit. Linguists must keep documents only on password-protected devices, must not pass them to anyone else, and must delete files and destroy notes as soon as an assignment is complete.
- Interpreting sessions held on our own meeting platform are not recorded unless the client asks for a recording in writing. Any recording is stored privately in our UK storage, is shared only with that client, and is deleted as section 11 sets out.
- Staff receive data protection and confidentiality training when they join and every year after that.

10. Personal data breaches

Anyone who suspects a breach, such as a misdirected email, a lost device, a document sent to the wrong person or unauthorised access to a system, must report it to the Data Protection Lead at once. We contain the breach, assess the risk and record every breach in our breach log, including those that do not need to be reported.

- Where we hold the data for a client, we tell the client without undue delay, and in any case within 24 hours of becoming aware, with the information it needs for its own assessment and any notification to the ICO.
- Where we are the controller, we notify the ICO within 72 hours when the law requires it, and tell the people affected without undue delay when there is a high risk to them.

11. How long we keep personal data

Records	How long we keep them
Bookings, assignment records, timesheets and invoices, including client contact details	Six years after the end of the financial year in which the work was done, to meet tax and legal requirements
Documents sent for translation, and the translations we deliver	12 months after delivery, so that we can answer queries and supply further certified copies, then deleted. A client can ask us to delete them sooner.
Linguists' copies of documents and their working notes	Deleted or destroyed as soon as the assignment is complete
Recordings of interpreting sessions on our meeting platform, where the client asked for one	30 days, or longer only if the client instructs us in writing, then deleted
Email correspondence about bookings	Six years, in line with the booking records
Quotations that did not become bookings	Two years
Questions our staff put to the internal assistant, and its answers	12 months, then deleted. Kept so that we can check the assistant is being used properly and is answering correctly.
Linguist records, including qualifications and checks	While the linguist works with us, and six years after their last assignment. Unsuccessful applications: 12 months.
Marketing contacts	Until the person unsubscribes or asks us to stop

12. Responsibilities

- **The directors** are accountable for data protection at UKLS and approve this policy.
- **The Data Protection Lead** maintains this policy and our record of processing activities, carries out impact assessments, handles requests from individuals and clients, manages breaches, and arranges training.
- **Staff** follow this policy, complete their training and report any concern or suspected breach straight away.

- **Linguists** keep everything they learn and receive in confidence, follow our instructions on handling documents, and report any suspected breach to us immediately.

13. Impact assessments and records

We carry out a data protection impact assessment before starting any processing likely to result in a high risk to individuals, and we keep it under review. Our assessment of interpreting and translation for public-sector clients, including children's services, is published alongside this policy. We keep a record of our processing activities as Article 30 of the UK GDPR requires, and we review this policy, our assessments and our records at least once a year.

14. Questions and complaints

Questions about this policy, requests from individuals and requests from clients for our data processing terms should go to the Data Protection Lead at info@uklinguisticservices.co.uk or 0800 2425 125, or by post to UK Linguistic Services Ltd, 301 Tea Factory, 82 Wood Street, Liverpool L1 4DQ. Anyone unhappy with how we have handled their personal data can also complain to the Information Commissioner's Office: ico.org.uk, 0303 123 1113.

15. Version history

Version	Date	What changed
1.0	March 2021	First issue, following the UK's departure from the EU and the UK GDPR coming into force.
1.1	March 2022	Annual review. No material change.
1.2	April 2023	Annual review. No material change.
1.3	April 2024	Annual review. No material change.
1.4	May 2025	Annual review. No material change.
2.0	1 September 2026	Full rewrite. Our roles as controller and as processor set out separately; a section on special category data, criminal offence data and children added; the technology providers we use, and where data is held, listed individually; the retention schedule set out in full; breach reporting timescales to clients stated; and the data protection impact assessment for public-sector work published alongside this policy.