

**GDPR Policy**

Talking Heads is a data controller. This means we have a valid lawful basis on which to process the personal data (predominantly) of suppliers, as part of our day to day business.

The GDPR applies to our data processing actions as we process data of individuals within the EU. As a course of best practice, the GDPR guidance will also be applied to the processing of all of our worldwide suppliers' information.

**What information does the GDPR apply to?**

**Personal data**

*The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.*

*This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organisations collect information about people.*

*The GDPR applies to both automated personal data and to manual filing systems where personal data are accessible according to specific criteria. This could include chronologically ordered sets of manual records containing personal data.*

*Personal data that has been pseudonymised – e.g. key-coded – can fall within the scope of the GDPR depending on how difficult it is to attribute the pseudonym to a particular individual.*

**Sensitive personal data**

*The GDPR refers to sensitive personal data as "special categories of personal data" (see Article 9).*

*The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual.*

*Personal data relating to criminal convictions and offences are not included, but similar extra safeguards apply to its processing (see Article 10).*

Source: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/key-definitions/> Accessed 12-4-2018.

Article 5 of the GDPR requires that personal data shall be:

*"a) processed lawfully, fairly and in a transparent manner in relation to individuals;*

This policy explains how we process data lawfully and fairly. For reasons of transparency, all processes can be viewed on request.

*b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;*

Talking Heads collects the following data from suppliers:

Surname	Address	Security References	Software
First Name	Website	Passport / visa proof to work	DPSI
Gender	Facebook/twitter/instagram	Proof of address (bill/bank statements)	Specialism/s
DOB	Photo	NINO	Pastimes
Company Name	Country of Origin	UTR Number	Qualifications, Experience
Email address	Primary Language Pair (Mother Tongue)	UK bank details	Certified / Sworn Translator
Skype	Other languages	PayPal Email	Transport Mode
Telephone number/s	CV	Working Status	DBS Check
Qualifications & Memberships	Previous Clients & Projects	Employment Status	CTC Check
Skrill email			

Talking Heads collects this data for the following reasons:

- To verify identity and right to work status in the UK
- To verify qualifications and professional experience to ascertain suitability to work on specific projects with such demands
- To remunerate suppliers for work undertaken
- To ascertain permission from the supplier about their marketing communication preferences

*c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;*

Talking Heads will only collect and store data that is absolutely required for the purposes above.

*d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;*

Talking Heads will update any information as soon as possible after we become aware that it is incorrect. Suppliers are provided with an online (password protected) area to keep their information up to date.

*e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and*

Data which has not been accessed after a period of time may be archived by Talking Heads. This data may be deleted after a period of time.

Under the 'right to erasure' / 'the right to be forgotten' guidance, an individual can request that their data is deleted permanently. There are conditions associated to this which can be found on the ICO website ([www.ico.org.uk](http://www.ico.org.uk)). An individual who wishes to make this request can email [info@talkingheads.co.uk](mailto:info@talkingheads.co.uk) or call 0114 4701075.

*f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."*

Talking Heads will ensure the secure upkeep of data, including but not limited to; conscientious password protection and upholding and up to date deletion of inactive / un-required data.

*Article 5(2) requires that:*

*"the controller shall be responsible for, and be able to demonstrate, compliance with the principles."*

Talking Heads receives and stores the collected data in the following way:

#### ONLINE

- Data is collected via online forms which are protected by HTTPS security.
- Some forms we use to collect data are designed by our IT team, who have all signed our Data Protection / GDPR Agreement.
- Some forms we use to collect data are designed on and provided by JotForm ([www.jotform.com](http://www.jotform.com)). Any data collected by JotForm is stored on JotForm's servers, which conform to the EU guidelines (<https://www.jotform.com/eu-safe-forms/>).

#### POST

- Usually delivered by the Royal Mail or courier.

#### PHONE/SMS

- Data collected over the telephone is processed and recorded by our VOIP provider, YayYay Limited t/a yay.com (<https://www.yay.com/blog/voip-provider/gdpr-compliance/>).
- Data collected over the telephone whilst on a conference call is processed by our conference call provider, Via-Vox Limited t/a Powwownow (<https://www.powwownow.co.uk/privacy>).
- Data collected via mobile telephones is processed and stored by our provider, giffgaff (<https://www.giffgaff.com/boiler-plate/privacy>).

## EMAIL

- All data is then retrieved (often via email) by our server and saved on our server, which is covered by the following security:
  - All information stored on local servers can only be accessed internally or via encrypted VPN technology.
  - Documents are stored on Windows servers which are fully patched in line with current Microsoft best practice.
  - Access to files is limited by username and password.

## OVERVIEW

### What personal data do we hold?

Suppliers' personal data as listed above.

### Where did it come from?

Primarily provided by suppliers. Sometimes personal information is provided by third-party suppliers such as proz.com (<https://www.proz.com/about/security/>).

### Who do we share it with?

In the case of standard (written) translation, transcription, typesetting work, etc., **we do not share any personal data** with anyone outside of our office and team.

In the case of 'Certified' Translation, where we provide a Certificate of Authentic Translation, we provide a certificate showing the suppliers first name, surname, language and sometimes, their qualifications.

In the case of (verbal) interpreting, we share the suppliers first and last name, photograph and language for which the supplier is providing the service on the timesheet supplied for the assignment and the confirmation email. On occasion, customers will request the personal email address and / or telephone number of a supplier. This information will only be given after permission has been granted by the supplier. This permission is sought via a secure online form available here: <https://www.thlinguists.com/datapermission>.

## Team Guidelines

These guideline apply to all employees, freelance workers and contractors who enter the TH office and / or work on TH projects.

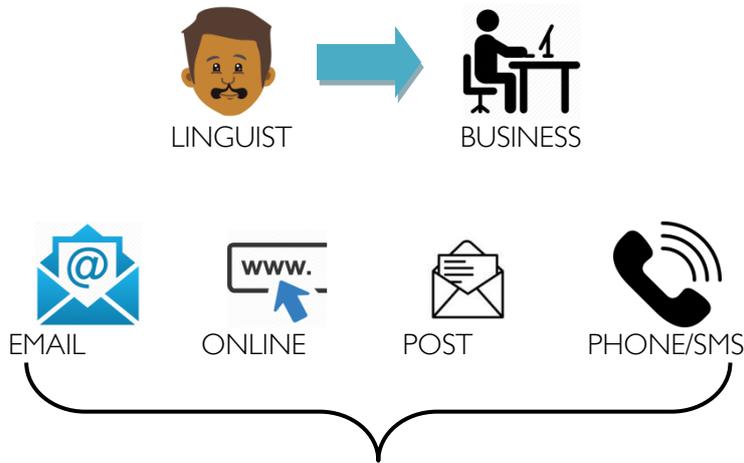
It is your responsibility to ensure that the data you have access to is protected. Actions may include:

- Not allowing non-authorised persons to have access to / know any identifying / personal data that the company has collected.
- Not informing any outside persons of the company processes or systems or systems providers, such as Jotform etc.
- Do not leave your computer unlocked when you are not in front of it and can protect the data yourself.
- When working remotely, not allowing any non-authorised person to see sensitive data, for example, by looking over your shoulder or by leaving your computer unlocked.

If you have any queries whatsoever, contact your Line Manager or a Company Director immediately.

Data Maps

SUPPLIERS' DATA – INTO THE BUSINESS



COLLECTS: Surname, First Name, Gender, DOB, Company Name, Email address, Skype, Telephone number/s, Address, Website, Facebook, twitter, Instagram, Photo, Country of Origin, Primary Language Pair (Mother Tongue), Other languages, CV, Qualifications & Memberships, DPSI, Specialism/s, Pastimes, Previous Clients & Projects, Qualifications, Experience, Certified / Sworn Translator, Transport Mode, Software, Working Status, Employment Status, NINO, UTR Number, UK bank details, PayPal Email, Skrill email, Disclosure and Barring Service (DBS) Check; revealing their full criminal history (other than protected cautions and convictions), Counter Terrorist Check (CTC), Security References, Passport / visa proof to work, Other ID and / or Proof of address (bank statements/bills etc.).



SUPPLIERS' DATA – LEAVING THE BUSINESS



LINGUIST DATA



EMAIL

Supplier name  
Supplier language  
Supplier qualifications  
Supplier photo  
Supplier tel number / email  
(where approved in advance)



ONLINE

Supplier language



POST

Supplier name  
Supplier language  
Supplier qualifications



PHONE/SMS

Supplier name  
(for arranged booking)



CUSTOMER



LINGUIST DATA



EMAIL

Supplier name  
Supplier language  
Supplier qualifications  
Hours worked



ONLINE



POST

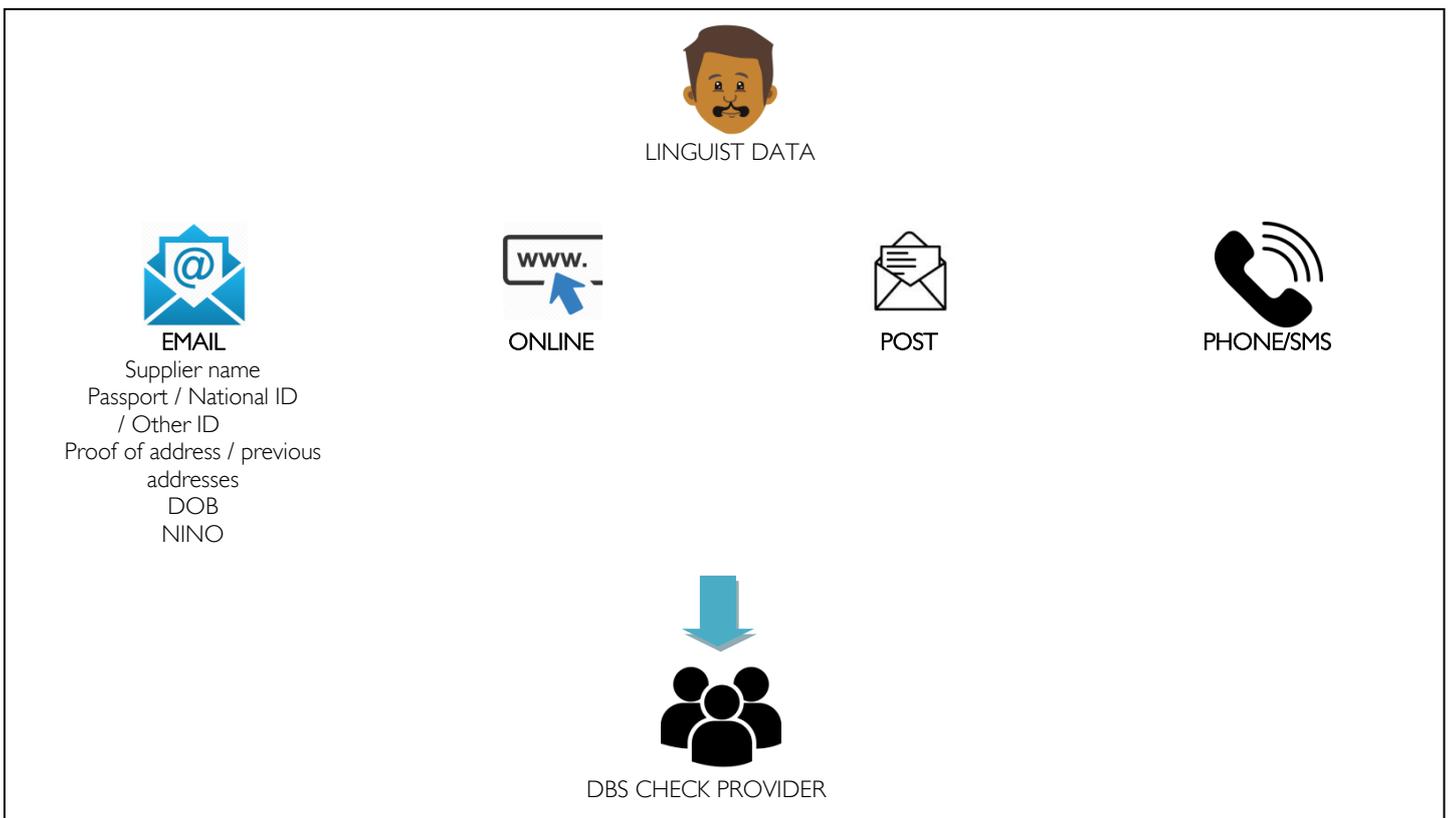
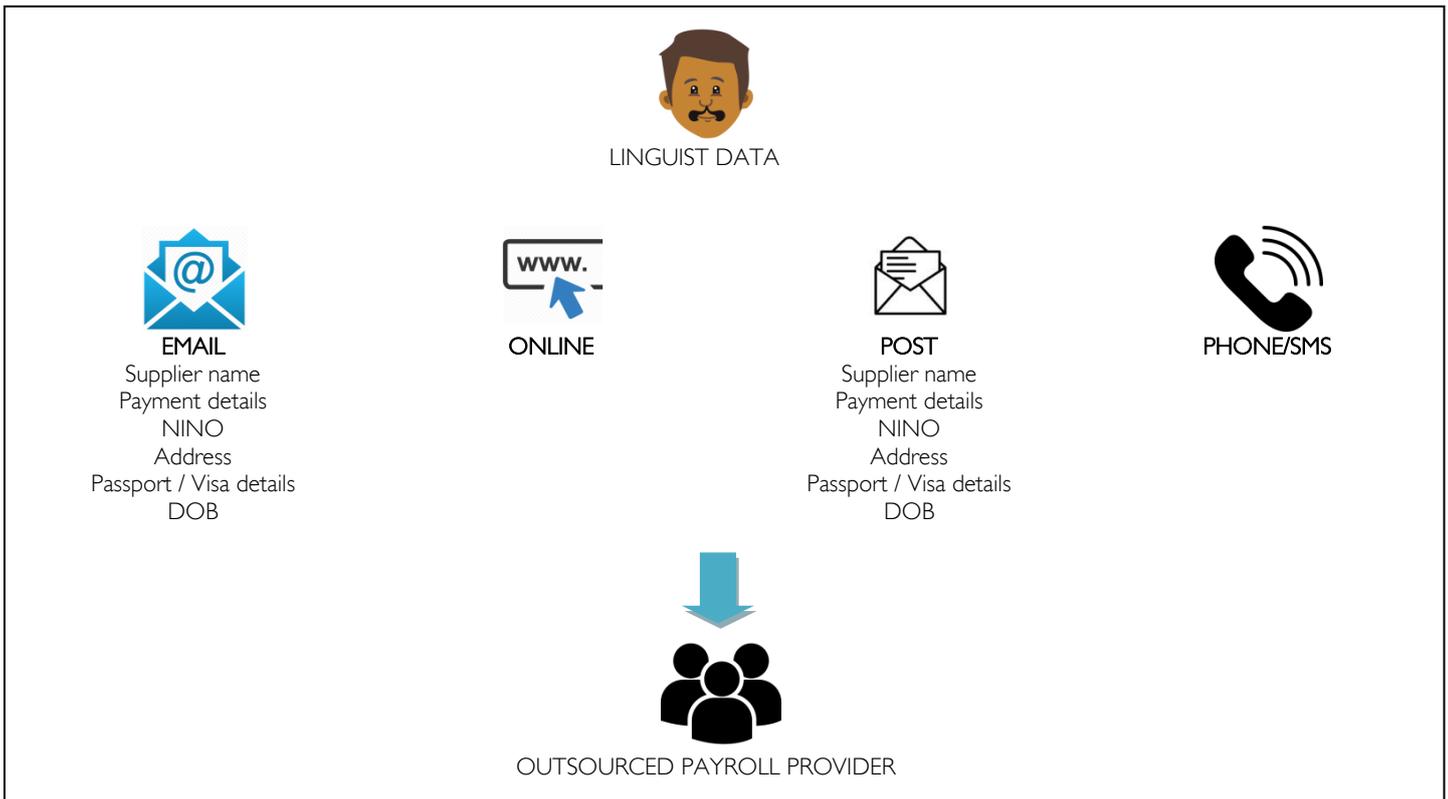
Supplier name  
Supplier language  
Supplier qualifications  
Hours worked



PHONE/SMS



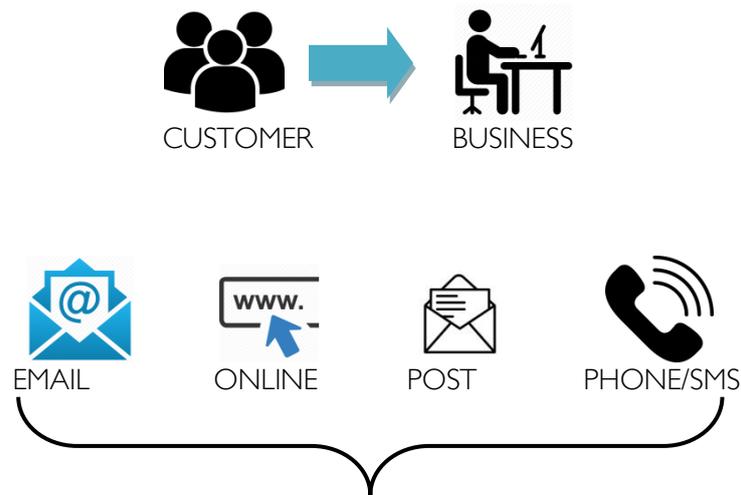
(Approved) THIRD PARTY REFERENCE REQUESTS



Other

- Remote working: All of the above accessible to TH staff members working remotely, using TH laptops or their own person laptops.
- Internal paperwork: Interpreting diary (Linguist name)
- Data requested by legal authorities for the purpose of carrying out work.

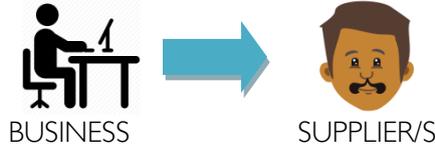
PROJECT REQUIREMENTS DATA – INTO THE BUSINESS



*COULD COLLECT:* Client information, pertinent to interpreting bookings/translation projects (client name, client email, client telephone number, client reference number, client PO number, any content sent to us by a client, i.e. documentation to be translated/relevant to the booking, which may contain; third party personal names, third party phone numbers, third party social media pages/usernames, third party email addresses, third party home addresses, photographs of third parties, etc., client's client name, Legal Aid references, other party names, client's client home addresses, client's client phone number, client's client language, client's client gender, date, time and duration of interpreting requirement, name of preferred linguist, client content (sometimes covered by NDAs))



PROJECT REQUIREMENTS DATA – LEAVING THE BUSINESS



EMAIL

Job Enquiries (non-identifying info only)

Job confirmations/orders (Client name, Client tel no., Client ref no., Any content sent to us by a client, i.e. documentation to be translated/relevant to the booking, which may contain: 3rd party personal names, 3rd party phone no.s, 3rd party social media pages/usemames, 3rd party email addresses, 3rd party home addresses, Photos of 3rd parties, Client's client name, Legal Aid refs, Other party names, Client's client home addresses, Client's client phone no., Client's client language, Client's client gender, Date, time and duration of interpr. requirement, Address of venue of interpr. booking.



ONLINE

Job Enquiries (non-identifying info only)

Job confirmations/orders (Client name, Client tel no., Client ref no., Any content sent to us by a client, i.e. documentation to be translated/relevant to the booking, which may contain: 3rd party personal names, 3rd party phone no.s, 3rd party social media pages/usemames, 3rd party email addresses, 3rd party home addresses, Photos of 3rd parties, Client's client name, Legal Aid refs, Other party names, Client's client home addresses, Client's client phone no., Client's client language, Client's client gender, Date, time and duration of interpr. requirement, venue address of interpr. booking.



PHONE/SMS

Job Enquiries (non-identifying info only)  
Last minute updates/changes to bookings – SMS (Client's (client's) address, Updated meeting times, Client phone numbers)



SUPPLIER/S



TIMESHEET

(emailed to and printed out by Supplier)

CONTAINS: Client name, Client telephone number, Client reference number, Any content sent to us by a client, i.e. documentation to be translated/relevant to the booking, which may contain:, Third party personal names, Third party phone numbers, Third party social media pages/usemames, Third party email addresses, Third party home addresses, Photographs of third parties etc., Client's client name, Legal Aid references, Other party names, Client's client home addresses, Client's client phone number, Client's client language, Client's client gender, Date, time and duration of interpreting requirement, Address of venue of interpreting booking, Linguist name, Linguist photo.