

Privacy Policy



Jerry Froggett, Chief Executive Officer
25-05-2018
Reviewed
01-11-2023

Cintra Language Services Group Ltd

Scope of Policy

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed and used by us. Cintra Language Services Group Limited and its subsidiaries (“Cintra”) respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from), handle your personal data in connection with this website, during recruitment and throughout your cooperation with Cintra. It will also tell you about your privacy rights and how the law protects you.

The Data Controller and Designated Data Controllers

Cintra Language Services Group Limited, as a company limited by guarantee, is the Data Controller under the Act, and the organisation is therefore ultimately responsible for implementation of the policy. It is also registered with the Information Commissioner’s Office with reference number Z653803X and Designated Data Controllers will deal with day to day matters.

Cintra has one Designated Data Controller, who is the Head of Business Operations with a number of important responsibilities including:

- monitoring Cintra’s compliance with GDPR and other data protection laws;
- raising awareness of data protection issues, training Cintra staff and conducting internal audits; and
- cooperating with supervisory authorities such as the ICO on our behalf.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us on business@cintra.org.uk

Complaints

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, greatly appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Your privacy and personal data matters to us and Cintra will make sure we:

- Always keep your data safe and private.
- Never sell your data.
- Allow you to manage and review your marketing choices at any time.

1. Cookies and Website Security

Cintra uses cookies to distinguish you from other users on the website and to assist with redirecting between the mobile and non-mobile versions of this website. This website has a secure certificate (SSL) using 2048bit encryption. For detailed information on the cookies we use and the purposes for which we use them, see our cookie policy at <https://www.cintra.org.uk/privacy>

2. Information We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Marketing, Training and Profile Data includes your interests and preferences in receiving marketing and training from us, your communication preferences and survey responses.

Please note that apart from the security clearances Cintra will not disclose or share Special Categories of Personal Data. Providing this information to Cintra is optional and we only use it to monitor our recruitment process and the effectiveness of our Equality and Diversity Policy. The information will be stored securely and will be treated in the strictest confidence.

We will collect, use, store and process different kinds of personal data about you which we have grouped together as follows:

For Cintra's Linguists, Employees and Directors:

- Identity Data includes first name, last name, username or similar identifier, title.
- Contact Data includes home address, corporate or personal email address, telephone and mobile numbers, social media and online accounts such as Skype, Facebook and Twitter.
- Registration Data includes self-employment status, references, qualifications, next of kin, professional memberships, languages, work experience, curriculum vitae, performance, feedback.
- Legal Compliance Data includes passport, national identity card, national insurance number, bank account details, P45 and HMRC starter form, driving licence, work permit, nationality, payroll, pension, health & safety records.
- Special Categories of Personal Data includes security clearances, disability, sexual orientation, relationship status, gender, ethnic background, religion.

For Service Providers and Business Clients:

- Registration Data includes organisation name, registered address, key contact name and job title, business email address and telephone number, website address, invoice recipient and address, company, and VAT number.

If you fail to Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract or service agreement we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

3. How is Your Personal Data Collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may share with us some of your personal information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- enquire about our products or services;
- apply for a training or job opening;
- request marketing to be sent to you;
- register as a linguist or client;
- enter a promotion or survey;
- give us some feedback.

Third parties or publicly available sources. We may receive analytics and advertising data about you from the sources listed below, as well as public sources. Please use the following links for more information about how organisations collect and use data when you visit their websites:

- Yoti: <https://www.yoti.com/privacy/>
- Facebook: https://www.facebook.com/full_data_use_policy
- LinkedIn: [linkedin.com/legal/privacy-policy](https://www.linkedin.com/legal/privacy-policy)
- NRPSI: <http://www.nrpsi.org.uk/about-us/terms-and-conditions.html>
- Google Analytics: <https://policies.google.com/privacy>
- NRCPD: <https://www.nrpsd.org.uk/documents/policies/Data-Commitment.pdf>
- ProZ: <https://www.proz.com/privacy>

4. How We Use Your Personal Data

Cintra will only use your personal data when the law allows us to. Most commonly, Cintra will use your personal data in the following circumstances:

- Where we need to perform the contract or service agreement we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on additional consent as a legal basis for processing your personal data other than in relation to sending or third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by updating your email preferences or sending an email to business@cintra.org.uk.

5. Purpose for Which We Use Your Personal Data

We have set out below, in table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose / Activity	Type of data	Lawful Basis for processing including basis of legitimate interest
To register you as a new customer or client	Registration Data	Performance of a service agreement with you
Linguist application through our website	Identity Data Contact Data Registration Data	Performance of a service agreement with you
Linguist registration	Identity Data Contact Data Registration Data Legal Compliance Data Special Categories of Personal Data	Performance of a service agreement with you Necessary to comply with a legal obligation
Office staff recruitment	Identity Data Contact Data Registration Data	Performance of a contract with you Necessary to comply with a legal

	Legal Compliance Data Special Categories of Personal Data	obligation
Mandatory ID verification	British Passport holders must comply with a third-party ID verification service (YOTI) to prove their legitimate British rights	Necessary to comply with a legal obligation
Right to Work Checks	All non-British citizens who have the legal right to work in the UK must provide a unique code to perform the online check on the government website	Necessary to comply with a legal obligation
Training course application and events	Identity Data Contact Data	Develop new products and services or enhance existing products and services.
Cintra newsletters and CPD events	Identity Data Contact Data	Necessary for our legitimate interests (to run our business, to improve our services and offer training)
Interpreting and Translation assignments	Identity Data	Performance of a service agreement with you
Asking you to leave a review or take a survey	Identity Data Contact Data	Necessary for our legitimate interests (to keep our records updated and to study how customers and linguists use our services)
Marketing, data analytics, customer relationships and experiences	Identity Data Contact Data	Necessary for our legitimate interests (to develop our services and grow our business, to run our business, to inform our marketing strategy, to define types of customers for our services and to keep our website updated and relevant)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can always control your contact and marketing preferences by updating your preferences or contacting Cintra. You can also opt out from future marketing, advertising and newsletter messages by following the “Unsubscribe” links on any message sent to you.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Disclosure of Your Information

Data processing partners

Cintra may disclose the data we collect from you to certain third parties who use personal data in delivering their services to us, they use data securely and confidentially and under strict contractual controls in accordance with data protection laws and enforced by Cintra. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Depending on your involvement with Cintra we may send personal data to the following sets of data processors in order to perform our services:

- external payroll company supervising our payment and payroll activities
- cloud-based mass email distribution platform
- cloud-based survey, questionnaire and analytical platform
- pension providers
- security clearance providers for security clearances
- linguist portal for Ministry of Justice interpreting and translation assignments
- Analytics providers, we use analytics and search engine providers that assist us in the improvement and optimisation of our site

We may also disclose your personal information in the following circumstances:

- If Cintra or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets
- If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation on request
- Enforce or apply the General Terms of Service and/or the Business Terms and/or any other agreements between you and us or to investigate potential breaches
- Protect the rights, property or safety of Cintra, our customers or others

International Transfers

Some of our external data processors are based outside the European Economic Area (EEA) so their processing of your personal data will necessarily involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by using specific contracts approved by the European Commission which give personal data the same protection it has in Europe (Privacy Shields).

7. Data Security

Cintra have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. To provide an extra layer of protection we are Cyber Essentials compliant, this governs all of Cintra`s data activities.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. In general, all information about staff and linguists will be kept for six years after a person leaves the company. Some information will, however, be kept for longer, including information in respect of pensions, taxation, potential or current disputes or litigation regarding the employment, and information required for job references.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see “Request erasure of your personal data” in the `Your legal rights section` for further information.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your Legal Rights

You have rights under data protection laws in relation to your personal data. Please see below to find out more about these rights:

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you. If you require this, then please contact our HR department.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. If you require this, then please contact our HR department.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. This information could be related to pensions, taxation, potential or current disputes or litigation regarding the employment, and information required for job references. Cintra is under certain obligations to retain certain data for a minimum of 6 years. Please note that these retention requirements supersede any right to erasure requests under applicable data protection laws.

Object to processing of your personal data. This is in situations where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights. Cintra is under certain obligations to process and retain certain data for compliance purposes. Please note that these requirements supersede any right to objection requests under applicable data protection laws. If you object to the processing of certain data then we may not

be able to provide the Cintra Services or maintain our service level agreement and it is likely we will have to terminate your account.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. Please note that any requests in relation to the restriction of the processing of your data means that we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel your use of our services or your service level agreement with us but we will notify you if this is the case at the time.

Request the transfer of your personal data to you or to a third party. We will provide to you, your personal data in a structured, commonly used, machine-readable format, which you can then transfer to an applicable third party. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. If you require this then please contact our HR Department.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide the Cintra Services to you or maintain the service level agreement. We will advise you if this is the case at the time you withdraw your consent.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer; especially if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Changes to Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on the Cintra website and, where appropriate, notified to you by e-mail.

11. Contact

All questions relating to data and your privacy are welcomed and should be addressed to our HR department. If you have any questions, comments or requests regarding this privacy policy then please:

- Take a look at some helpful guidance on ICO website which can be found here: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>; or
- Contact our HR department on hr@cintra.org.uk