

Language Line TI Privacy Policy

Language Line TI Limited take care to protect the data privacy of our clients (and, if relevant, their customers), linguists and subcontractor agency partners, and we comply with all relevant data protection legislation including the UK General Data Protection Regulations (“**UK GDPR**”) and the Data Protection Act 2018 (“**DPA 18**”). We will not share your information with third parties, or any company outside of the Capita Plc group of companies, except if required to do so by law or as set out in this privacy policy.

Below is some information on how we will use your personal data.

Who is collecting your information?

We are Language Line TI Limited (“**Language Line TI**”). Our registered address is Queen Elizabeth House, 4 St. Dunstan's Hill, EC3R 8AD, 5th Floor, United Kingdom. Our postal address is Riverside Court, Huddersfield Road, Delph, Oldham, Greater Manchester, OL3 5FZ. If you wish to contact us, you can call +44 (0)845 367 7000 or email DL-CTI-Marketing@capita.com.

What personal data do we collect?

We collect personal data from various sources depending on how you contact us and the purpose for which we process your personal data.

Contact	Channel	What we collect
Language Line TI Clients or Prospective Clients	We will collect personal data via: <ul style="list-style-type: none">• Our website forms• Our client online portals• Email• Telephone call• In person at trade fairs or marketing events	<p>If contact between us is via any of our online portals, website, email, or telephone for a quote or for information about any of our services, or to instruct us to provide any of services to you, we will collect your name, email address, telephone number, job title, company name and address.</p> <p>We may ask you for details of the service(s) that you require, along with information relevant to each service. Depending upon the service(s) required, this may include language(s) required, wordcount, page count, location where services are to be delivered, length of booking, software to be used in delivering the services, method of payment.</p> <p>You may also send us documentation that you require us to translate that may contain personal data or you may provide us with personal data during the course of our interpretation services. For this personal data, you will be the data controller and we will be the data processor and you should ensure that you have all necessary lawful basis to provide the personal data to us. We will only use this personal data to provide a quote for our service and, if you instruct us to provide our service, to provide those services to you.</p> <p>All information collected from you will be stored in our secure online systems. Where we are the data controller, we will not keep your personal data for longer than is necessary. Where we are the data processor, we will keep your personal data in accordance with your data retention policy that you notify to us. If you do not provide us with your data retention policy then we will keep the personal data for no longer than is necessary. Details of our retention policy are set out below.</p>

<p>Linguists</p>	<p>We will collect personal data via:</p> <ul style="list-style-type: none"> • Our website • Our linguist online portals • Email • Telephone call • In person at recruitment events or trade fairs. 	<p>If you apply to work with us as a linguist, we will ask for information at different stages of our onboarding and vetting process depending upon how you first contact us. This may include:</p> <ul style="list-style-type: none"> • Personal information (name, date of birth, gender, contact information, nationality, details of vaccinations received, details of any disabilities or medical conditions for which you may need support to deliver services, photo ID, passport sized photograph); • Employment history and education details (CV, language, interpreting or translation related qualifications, interpreting or translating experience with referees, professional memberships, security clearances held); • Service provision related information (language(s) in which you can provide the service(s), payment rates) • Payment information (bank details, company name, tax / VAT information); • Supporting document (qualification certificates, proof of hours of experience, change of name documentation, proof of address, proof of right to work in the UK). <p>All information collected from you will be stored in our secure online database within your unique online supplier profile. It will be retained until such time that (i) we deactivate your supplier profile, following a 12-month period where no work has been accepted or completed; or (ii) you confirm that you are no longer providing services to Language Line TI clients, or you ask us to remove your information.</p>
<p>Agency Subcontractor Partners</p>	<p>We will collect personal data via:</p> <ul style="list-style-type: none"> • Our website • Our linguist online portals • Email • Telephone call • In person at recruitment events or trade fairs. 	<p>If you apply to work with us as an agency subcontractor partner, we will ask for information at different stages of our onboarding and vetting process depending on how you first contact us. This will include:</p> <ul style="list-style-type: none"> • Personal details (Name, contact information, job title) • Company information (Company name, registration numbers, VAT number, ISO certifications held, professional memberships held); • Service provision information (service(s) provided, languages, payment rates, previous experience); • Payment information (bank details, company name, tax / VAT information); • Qualifications, Right to Work in the UK status, professional memberships, and security clearance information for any linguists you will be engaging to deliver services to Language Line TI clients. For this information, you will be the data controller and we will be the data processor and you should ensure that you have all necessary lawful basis to provide the personal data to us. <p>All information collected from you will be stored in our secure online database within your unique online supplier profile. It will be retained until such time that (i) we deactivate your supplier profile, following a 12-month period where no work has been accepted or completed; or (ii) you</p>

		confirm you are no longer providing services to Language Line TI clients, or you ask us to remove the information.
Language Line TI Website Users	<p>We will collect data when you:</p> <ul style="list-style-type: none"> • Are using our website • Submit a 'contact us' or 'registration' form on our website. 	<p>The information which we collect and store during normal use of the Language Line TI website is used to monitor and analyse how parts of the site are used. The information that we collect will include:</p> <ul style="list-style-type: none"> • Details of which version of web browser, device, network, and operating system you used • IP address • Information on how you use the site, using cookies and page tagging techniques. <p>Our Cookies policy can be found in the section "Use of Cookies" below.</p> <p>You have the option on certain pages within the Language Line TI website to submit personal information to Language Line TI in order that we might send you further information or contact you with regards to a request or information relating to our services. To opt out of any email communications from us, please click the 'unsubscribe' link at the foot of the email in question. The information that we will collect when you submit a 'contact us' or 'registration form' includes:</p> <ul style="list-style-type: none"> • Questions, queries, or information you submit, including your email address • Your email address and subscription preferences when you sign up to our email alerts, and how you use our emails – for example whether you open them, and which links you click on. <p>For the purpose of direct marketing, we will ask for your consent to this marketing. We will not use personal data submitted other than for the stated purposes.</p>
Complaints and disputes	<p>We will collect personal data via:</p> <ul style="list-style-type: none"> • Our website forms • Our client online portals • Email • Telephone call • In person at service review meetings with our Account Management Team 	<p>Whilst recording, investigating, and dealing with a dispute or a complaint, we may collect the following information in order to fully understand what has occurred, to provide a response, defend ourselves (if applicable), and resolve any issues:</p> <ul style="list-style-type: none"> • Name and contact information • Booking reference / Project reference / date and time services were received • Details of any incident(s) that occurred including the details of those present – this may include Language Line TI client representatives, non-English speakers, or members of the public. <p>All information collected will be stored in our secure online database in line with UK GDPR / DPA 18 requirements.</p>

What do we do with your data?

We use the information we collect from you in a few different ways:

Contact	Channel	What we do with your data
Language Line TI Clients or Prospective Clients	<ul style="list-style-type: none"> • Our website forms • Our client online portals • Email • Telephone call • In person at trade fairs or marketing events 	<p>We process your personal data so that we can contact you about, or supply you with, a quote for a translation or interpreting request and/or to deliver translation or interpreting related services to you.</p> <p>We may also use any personal data that you provide in order to enforce any agreement with you.</p>
Linguists or subcontractor agency partners	<ul style="list-style-type: none"> • Our website • Our linguist online portals • Email • Telephone call • In person at recruitment events or trade fairs. 	<p>We process your personal data so that we can contact you with regards to your application as a translator or interpreter or agency subcontractor partner for Language Line TI.</p> <p>For translators and interpreters, once we have assessed the information you have provided, if you meet the criteria required to provide services to our clients, we may require you to undergo one or more vetting checks including a RTW check (Right to Work in the UK), EDBS check (Enhanced Disclosure Barring Service), NPPV Level 3 or NPPV Level 3 with SC (Non-Police Personnel Vetting with or without Security Clearance), Financial Probity check. We utilise specialist third party vetting companies to complete vetting on behalf of Language Line TI and are required to submit your details to them in order for them to contact you. We will confirm this with you and ask for your consent prior to doing so.</p> <p>Once you have been fully onboarded and vetted and are included in our supplier panels, on an ongoing basis we will contact you to offer suitable translation / related projects or interpreting jobs.</p>
Language Line TI Website Users	When using our website or submitting 'contact us' or 'registration' forms	<ul style="list-style-type: none"> • The information which we collect and store during normal use of the Language Line TI website is used to monitor and analyse how parts of the site are used • In connection with any application, request, or enquiry you make, your information will be passed directly to the relevant business unit or department within the Capita Plc group of companies so that we can provide you with details of our services. <p>You have the option on certain pages within the Language Line TI website to submit personal data to Language Line TI in order that we might send you further marketing information or contact you with regards to a request or information relating to our services. To opt out of any email communications from us, please click the 'unsubscribe' link at the foot of the email in question.</p>
Complaints and disputes		We will use any personal data you provide relating to a complaint in order to investigate, settle, and defend (as applicable) any complaint or dispute.

The legal basis for processing your data

Contact	Channel	Legal basis for processing
Language Line TI Clients or Prospective Clients	Client online portals / website forms / emails / telephone calls	<p>Legitimate business interest, in order for us to answer any enquiry that you make.</p> <p>If there is a contract between us, processing is necessary for the performance of that contract.</p> <p>Where you are the data controller and we are the data processor, you are responsible for ensuring a lawful basis for the processing and we will only process that personal data on your documented instructions.</p>
Linguists or subcontractor agency partners	Linguist online portals / website forms / emails / telephone calls	<p>Legitimate business interest, in order for us to answer any enquiry that you make, and/or, if applicable, to assess your suitability for us to engage your services.</p> <p>Prior to entering into a contract and during a contract, we may need to process personal data to comply with any laws imposed on us, for example, to ensure your right to work in the UK and in order to pay you.</p> <p>If there is a contract between us, we may process your personal data necessary for the performance of that contract.</p>
Language Line TI Website Users	When using our website or submitting 'contact us' or 'registration' forms	Legitimate business interest based on your contact and in order to monitor and improve the website.
Complaints and disputes		Legitimate business interest in order to deal with the complaint/dispute.

Consent

We may also use your personal data where you give us your express consent, for example, when you provide consent to receive marketing materials.

Sharing information

Your personal data will not be shared outside the Capita Plc group of companies unless required by law, or in accordance with the Data Transfer section below and this Privacy Policy, or in the case of interpreters or translators:

- with our vetting partners to contact you for vetting checks as part of the supplier onboarding process. We will confirm this with you and ask for your consent prior to doing so.
- With our clients to
 - confirm who will be providing services and your level of security clearances held
 - enable them to send your meeting invites to provide pre-booked remote interpreting services via the platform of the client's choice
 - make contact with you to provide any essential information before delivering services
 - enable them to audit us to ensure our compliance with contractual requirements in terms of the levels of qualifications, experience and vetting checks completed for linguists.
- With any Public Sector Framework Quality Assurance Suppliers to
 - allow them to audit Language Line TI's adherence to the Framework terms and specification
 - to contact you to arrange an assessment as per the requirements of the Framework.

Data transfers

Where we are the data processor, we will not transfer or process personal data outside of the UK and the European Economic Area (EEA), unless specifically agreed with the data controller. Where such transfers are agreed with the data controller, personal data may be transferred outside the UK and the EEA as set out in the table below.

Where we are the data controller, personal data may be transferred and processed outside of the UK and the EEA as set out in the table below.

Where we transfer and process personal data outside of the UK and the EEA, we will ensure that such transfers and processing are compliant with the UK GDPR and DPA 18 (and, where applicable, the GDPR) and that appropriate measures are in place to keep personal data secure, in accordance with applicable law.

Contact	Data Transfers
Language Line TI Clients or Prospective Clients	<p>To deliver a 24/7/365 (twenty-four hours a day, seven days a week and three hundred and sixty-five days a year) service, we have employees, project managers, linguists and subcontractor agency partners in various time zones and countries.</p> <p>For translation and related services, and on-demand remote interpreting services, personal data and (subject to your prior agreement) your customer's personal data that you provide to us may be processed outside the UK and EEA as follows:</p> <ul style="list-style-type: none">- by our Language Line TI teams outside of the UK and the EEA to enable our project managers and employees to carry out such actions as are required to allocate your request to a suitable linguist or subcontractor agency partners, and to receive and check the translated content in order to perform quality checks and deliver the final files back to you;- by our linguists or subcontractor agency partners (translators) who will translate the source file that you provide to us into the target language(s) requested. Our linguists are located throughout the world. We will only transfer personal data to our linguists that strictly need to have access to your personal data for Language Line TI to provide its services to you;- Linguists or subcontractor agency partners (interpreters) who will interpret what is said between the two parties during an on-demand remote interpreting call. This may include personal and sensitive categories of data that is discussed during the conversation, but which will not be recorded or inputted into any systems.
Linguists and subcontractor agency partners	<p>Your personal data may be processed by our Language Line TI teams outside of the UK and European Economic Area (EEA) to enable our project managers to carry out such actions as are required to assign projects to you, communicate any project updates, address any language queries you may have and receive your completed works, as well as raising purchase orders for you.</p> <p>Your personal data may also be transferred to The Security Watchdog, who have a team based in India. All data submitted to The Security Watchdog for the purposes of vetting, will be stored securely in UK based servers and accessed by The Security Watchdog team in India to process the vetting checks.</p>

Language Line TI Website Users	Not applicable
Complaints and disputes	In the event that there is a complaint from a linguist, subcontractor agency partner, client or prospective client it will be processed as above.

How long do we keep your data?

We will keep your personal information for the purposes set out in this Privacy Policy and in accordance with the law and relevant regulations. We will never retain your personal information for longer than is necessary. For further details on data retention, please contact DL-CTI-Marketing@capita.com.

What if you do not want to provide information?

If you do not wish us to process your personal data in order to use this site, please contact us on DL-CTI-Marketing@capita.com.

Use of Cookies

We operate in line with the latest guidance from the Information Commissioner’s Office which you can view via this link: <https://ico.org.uk/for-organisations/guide-to-pecr/guidance-on-the-use-of-cookies-and-similar-technologies>.

Other websites

This website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

Data subject’s rights

As a data subject, you have the following rights, which you can enforce by contacting DL-CTI-Marketing@capita.com.

The right to be informed

Language Line TI has an obligation to provide “fair processing information”. We comply with this through this privacy notice which emphasises the need for transparency over how we use personal data.

The right to access

You have the right to obtain confirmation that your data is being processed and a right to obtain access to your personal data (e.g. By receiving a copy of it). We have an obligation to provide this information within 1 month of your request.

The right to rectification

You have the right to have your personal data rectified if it is inaccurate or incomplete. If Language Line TI has provided your details to a third party, then we have a requirement to inform them of the rectification where possible

The right to restrict processing

You have the right to restrict or block processing of your personal data. Where processing has been restricted Language Line TI has the right to store the personal data, but we are not permitted to process it further. We will retain enough information about you to ensure that restriction is respected in the future.

The right to erasure (also known as the right to be forgotten)

You have the right to request deletion or removal of your personal data when there is no compelling reason for its continued processing.

The right to data portability

Data portability allows you the right to obtain and reuse your personal data for your own purpose across different services. It allows you to move, copy or transfer your personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.

This right only applies to personal data that you have provided to Language Line TI as the data controller; where processing is based on your consent or for the performance of a contract; and when processing is carried out by automated means.

The right to object

UK GDPR gives you the right to object to processing in certain circumstances. This includes the absolute right to object to direct marketing (including profiling). In order to manage your preferences, Language Line TI marketing communications will always include the option for you to opt out (unsubscribe) from marketing updates. For further information please contact DL-CTI-Marketing@capita.com.

The right to withdraw consent

If we are processing personal data based on having received your consent you have the right to withdraw that consent at any time.

The right to complain to a supervisory authority

You have the right to lodge a complaint to the ICO using the following details:

Information Commissioners Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745.

Changes to our privacy policy

We keep our privacy policy under regular review, and we will place any updates on this web page. This privacy policy was last updated on 7th June 2022.