



Privacy Notice

Introduction

CIOL and CIOL Qualifications (CIOLQ) treat all personal data received with respect to ensure such data remains safe and secure. Under the General Data Protection Regulation (GDPR) you have a legal right to understand how we use and protect your personal data. We may change this privacy notice from time to time to reflect updates to our privacy practices. This document was last reviewed in March 2023.

We are committed to protecting and respecting your privacy. This privacy notice applies to personal information collected and processed by us.

CIOL and CIOLQ, registered office 167 Fleet Street, London EC4A 2EA are the data controllers of your personal data and we are registered with the <u>Information Commissioner's Office</u> ICO). You can contact us by email, post or phone:

- CIOL membershipteam@ciol.org.uk
- CIOLQ qualifications@ciol.org.uk

What this Notice covers

This Notice covers the qualification, assessment and membership services we provide and the benefits of membership we offer. It does not cover any external websites which may be reached from links within our website (www.ciol.org.uk) or via our email communications. In such cases you should read the privacy notice of the site you subsequently visit.

You are advised to read the Privacy Notice carefully. The Notice also applies if you are not a CIOL member and you interact with us, for example, by:

- 1. Applying for membership or registering for a CIOLQ assessment
- 2. Registering for a CIOL event, to attend in person or online
- 3. Contacting our Membership Services or the CIOLQ Client Services Team (CST) by telephone, email or any other means
- 4. Using our online website contact form to make an enquiry
- 5. Contacting one of our divisions, societies or networks via our website or by email

Our lawful basis for processing your data

There are six lawful bases for processing data, details of which can be found on the ICO website. We have determined the following as our lawful bases for processing your data:

- 1. **Contract;** we require your personal data in order to:
 - Fulfil your membership with us, to make available all services and benefits of membership and to keep in touch with you about your membership. This lawful basis also applies to those who are in the process of applying for membership in any grade.
 - Process and manage your qualification or assessment application and keep you informed about it including any notifications about the exam or assessment itself, your results, your final award and any subsequent enquiries about results and appeals (as applicable).
- 2. **Legitimate interests** we will only use your data in ways you would reasonably expect in conjunction with:
 - Membership
 - Qualifications and assessments
 - Studying a language or language specialism such as translating and interpreting
 - Working as a language professional or using languages in a professional capacity
 - Relevant training opportunities

In addition, if you are a past candidate or lapsed member we may use your personal data to keep you informed of news and other updates. You can opt out of these communications at any time.

Keeping your data accurate and up-to-date

Membership (all grades)

It is important that the information we hold for you is accurate and up-to-date.

CIOL members can view the personal data we hold via their online My CIOL account where you can make changes directly. Alternatively, you can contact the membership team on membershipteam@ciol.org.uk..

Assessments

If you are a candidate you will need to advise the Client Services Team of any changes in your personal information by email to qualifications@ciol.org.uk.

Non-members

If you are applying for CIOL membership (all grades) the data you supply in your application will be treated in the same way as the data we hold for CIOL members.

Data retention

Current members

We will retain and use your data whilst processing your application, whilst your membership is active and throughout the renewal period (up to six months after the date your membership is due for renewal).

Lapsed members

If you allow your membership to lapse, we are legally required to retain financial data for a period of seven years to comply with regulatory audit requirements. We will only retain your name, your unique CIOL number and the financial data associated with your membership record.

In addition, CIOL may contact you to invite you to rejoin or share with you CIOL news and updates; we will hold your data for up to three years for this purpose. When you join (or renew your membership) we will ask for your consent to keep in touch with you.

Candidates

Under legislative and regulatory requirements we are required to retain sufficient evidence of candidates' work or assessment decisions. Details of what information is kept, why it is kept and the retention period can be found with our other CIOLQ policies here.

Security of data

All membership data is stored securely on our membership database. The systems are hosted domestically in the UK and the contractor is fully compliant with GDPR and ISOs 27001, 27018, 22301, 9001, 14001, Cyber Essentials+ and additionally hold an attestation of compliance as a PCI DSS Level 1 Service Provider. Staff access to data systems is managed with appropriate access security and two-factor authentication.

Our membership database is integrated with our website, through which personal information is submitted; for example new applicants' information is securely submitted via the CIOL website.

If you are also taking an assessment the information you provide on the application form will also be stored on a secure qualifications database.

What kinds of personal information do we collect and how will we use it?

The personal information we collect depends on why you are engaging with us.

Membership:

We may collect the following personal data as part of the membership application process:

- 1. Personal contact details such as title, full name, address, telephone numbers and email address
- 2. Date of birth
- 3. Nationality or nationalities (and previous nationality/nationalities)
- 4. A record of your contact with us e.g. advice given during the application process and as a member
- 5. CV (if submitted as part of the application or membership upgrade process)
- 6. Certificates and transcripts of results
- 7. Evidence of other professional memberships
- 8. Evidence of the type of work you do as a linguist and your work volume
- 9. Details of your first language (s) and your other language(s) of qualification
- 10. IP address the application was submitted from

Once admitted to membership we will use your personal data as outlined above to fulfill our obligations to you as a member and to deliver the benefits associated with being a member. Information detailed above will form the basis of your membership record; we may need to refer to this information from time to time if, for example, you change your category of membership or apply to become a chartered linguist. Information under point 10. above is not stored beyond the application form submission record.

Qualifications and Assessments

We may collect the following personal data as part of the application process:

- 1. Personal contact details such as title, full name, address, telephone numbers and email address
- 2. Your date of birth
- 3. Your current nationality
- 4. Your source language and your target language

Your personal data above is used to fulfill our obligations to you as an exam or assessment candidate and will form part of your candidate record.

General enquiries

You may also give us your information by:

- 1. completing the Contact Us form on the website
- 2. calling us
- 3. sending us an email or letter
- 4. booking to attend an event

Using third parties within and outside the EEA

However you provide your personal information, we will never pass your details to any other company unless it is in relation to your exam or assessment or to fulfill a benefit or service of membership, such as the fulfilment house we use to distribute CIOL's professional journal *The Linguist*.

When data is passed to a third party, this is always under a formal agreement or legal contract and is on the basis that:

- We will only provide the information needed to perform the specific service
- The third party only uses your data for the exact purpose or purposes we specify in our agreement or contract with them
- The third party is also complying with current data protection legislation, as applicable and understands that your privacy is respected and protected at all times
- If we stop using their services, any of your data held by them will be securely deleted or rendered anonymous

We work with IT service companies under contract who support our website and other business systems. We may use your data for analytical purposes, but in such cases the data will be anonymised.

Access and your rights

Subject Access Request (SAR)

A SAR enables you to find out what personal data we hold about you. Personal data, as defined by the Information Commissioner's Office (ICO), as data which relates to a living individual from which the individual can be identified.

If you wish to make a SAR this needs to be made either in writing or by email. We may subsequently ask you to complete an online form should the information you are requesting be of a complex nature.

There is no fee for an initial SAR unless the request is of a complex nature or is one of a number of requests relating to the same data subject. In such cases we reserve the right to charge a reasonable fee.

What information are you entitled to under a Subject Access Request?

You can request all the information we hold about you.

In addition you are entitled to be:

- Told whether personal data is being processed
- Given a description of the personal data, the reasons it is being processed and whether it will be given to any other organisation or people

- Given a copy of the personal data; and
- Given details of the source of the data (where this is possible)

You can find out more about your rights by visiting the **ICO** website.

What is the time limit for responding?

We will aim to respond promptly and in any event we will respond within the legal timeframe of one calendar month.

In addition you also have the following rights:

The right to rectification

You have the right to ask for inaccurate personal data to be rectified or completed if it is incomplete. You can make a request for rectification either verbally or in writing. We will respond to the request as soon as possible; legally we have to respond within one calendar month.

Right to erasure (or right to be forgotten)

You can make a request for us to securely and permanently delete all personal information we hold about you in writing (by email) which we legally have to action within one calendar month. Some information we are required to retain for regulatory purposes, specifically in relation to CIOLQ qualifications and financial records.

Right to restrict processing

You have the right to request the restriction or suppression of your personal data. There may be regulatory reasons why this is not possible in relation to qualifications and financial activity.

CIOL members can restrict the use of or suppress the use of their personal data via their online My CIOL account. Or you can make a request to us by email; we will respond within one calendar month.

Right to data portability

The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services. This is normally in relation to the financial industry for example if you are with one bank and wish to move to another.

Right to object

The current legislation also states that you have the right to object to:

- 1. Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling)
- 2. Direct marketing (including profiling); and

3. Processing for purposes of scientific/historical research and statistics

One of our lawful bases for processing your data is *Legitimate Interest* (see Lawful Basis for Processing Your Data above). We only use your data in a way you would reasonably expect and only in relation to your membership (or application for membership) and/or entering for an examination.

You can find out more information by visiting the ICO website

Our contact details

Members and applicants:

- membershipteam@ciol.org.uk
- 167 Fleet Street London EC4A 2EA

Exam and Assessment candidates:

- qualifications@ciol.org.uk
- 167 Fleet Street London EC4A 2EA

Filing a complaint

Should you wish to file a complaint about the way we have obtained, stored or used your data, or the way we have handled requests for information under your legal rights please contact the <u>Information Commissioner's Office</u>.