



# Chartered Institute of Linguists

## Privacy Notice

### Introduction

CIOL and IoLET (its associated charity trading as CIOL Qualifications) have always treated all personal data received with respect, ensuring such data remains safe and secure. Under the General Data Protection Regulation (GDPR) introduced in May 2018 you now 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 our privacy practices. We therefore encourage you to regularly check this privacy notice for changes and updates.

**This policy was last reviewed on 28 February 2019.**

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

CIOL (and IoLET), registered office 167 Fleet Street, London EC4A 2EA, are the data controllers of your personal data and we are registered with the [Information Commissioner's Office](#) (ICO). You can contact us by post (to the above address) or by email or phone:

- CIOL – [membershipteam@ciol.org.uk](mailto:membershipteam@ciol.org.uk)
- IoLET – [qualifications@ciol.org.uk](mailto:qualifications@ciol.org.uk)
- Telephone - +44 (0)20 7940 3100

### What this Notice covers

This Notice covers the qualification, examination 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](http://www.ciol.org.uk)) or via our email communications. In such cases we will endeavour to make it clear that you are moving to another website; you should always read the privacy notice of any site you subsequently visit.

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

1. Applying for membership or entering for an exam
2. Registering for a CIOL event, to attend in person or online
3. Contacting our Membership Services or Client Services teams 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

We must have a lawful basis in order to process 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 linguists who are in the process of applying for membership in any grade.
  - Process your exam entry and to keep you informed about your examination including notifications about the examination 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 examinations
  - studying a language or language specialism such as translating and interpreting
  - working as a language practitioner
  - relevant training opportunities

In addition, if you are a past examination candidate or lapsed member, we may use your personal data to keep you informed of news and 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. You can make changes in real time or alternatively you can contact the membership team on [membershipteam@ciol.org.uk](mailto:membershipteam@ciol.org.uk) or by phone on +44 (0)20 7940 3100.

### Examination candidates

If you are an IoLET Affiliate member you will also need to advise Client Services of the changes by email to [qualifications@ciol.org.uk](mailto:qualifications@ciol.org.uk) or by phone on +44 (0)20 7940 3100.

### 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.

### Examination candidates

Under legislative and regulatory requirements we retain sufficient evidence of exam candidates' work or assessment decisions. Details of what information is kept, why it is kept and the retention period can be found in our Retention of Information policy which can be [accessed 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, UKFast, 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 stringently through the use of two-tier admin levels, two-factor authentication login processes and strict, automated password management.

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

If you are also taking an examination the information you provide on the examination entry form will also be securely stored on a separate qualifications database.

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

### Members (including applicant members):

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

### Membership:

We 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 mother-tongue(s) and your language(s) of qualification
10. IP address the application was submitted from

Once admitted into membership we will use your personal data outlined in (1) above to fulfill our obligations to you as a member and to deliver the benefits associated with being a member. Information detailed in points (2) to (9) 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 (10) above is not stored beyond the application form submission record.

### **Qualifications**

We collect the following personal data as part of the examination entry process, with the exception of (6) which is collected for monitoring purposes:

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 gender
5. Your source language and your target language
6. Your ethnic group

Your personal data outlined in (1) above is used to fulfill our obligations to you as an examination candidate and will form part of your candidate record along with points (2) to (5).

### **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 examination e.g. an examination centre and/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 also work with a range of IT companies who support our website and other business systems. We may also use your data for analytical purposes, in all such cases the data will be anonymised.

## Access and your rights

### Subject Access Requests

A Subject Access Request 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 Subject Access Request 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.

Fees: 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 organisations 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 to your Subject Access Request 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) or verbally (by phone), which we legally have to action within one calendar month. Some information we are required to retain for regulatory purposes, specifically in relation to IoLET 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 phone or email; we have a legal obligation to 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

We do not engage in the activities detailed in points (2) and (3). 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](mailto:membershipteam@ciol.org.uk)
- +44 (0)20 7940 3100
- 167 Fleet Street, London EC4A 2EA, UK

### Examination candidates:

- [qualifications@ciol.org.uk](mailto:qualifications@ciol.org.uk)
- +44 (0)20 7 940 3100
- 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 [Information Commissioner's Office](#).