# Wolfestone Holdings GDPR Supplier Agreement

# Data Protection and Security Procedures for Suppliers of Language-Related Services

Wolfestone Holdings (Wolfestone Translation, Voicebox and Robertson Languages International) acts as a joint data controller and data processor for our clients.

In order to fulfil business contracts for our clients, Wolfestone Holdings may be required to process documents containing personal data. We do this by engaging data sub-processors for language-related services.

By language-related services we mean: translation, transcription, interpreting, language training, subtitling, voice over, audio and video editing, desktop publishing, localisation engineering, and any other service we may require in order to fulfil the contract with our client.

It is up to Wolfestone Holdings to inform you if a file contains personal data, including special categories of personal data. It is also up to us to ensure that we have established with the client and/or data subject a lawful basis or adequate consent for processing this data. If we have not informed you that a file contains personal data, and you notice that there is personal data contained within the file, please notify your project manager immediately.

As a supplier of Wolfestone Holdings, you are a data sub-processor. In order to comply with EU GDPR (General Data Protection Regulations) around personal data we need to make sure you, as sub-processors, are taking adequate precautions surrounding data security and protection of personal data within files you receive as part of a business contract with Wolfestone Holdings.

Please read the requirements below and sign and return this form. If you do not return this form, you will be excluded from certain kinds of projects in order for Wolfestone Holdings to remain GDPR compliant.

## Before a project

We will sometimes send you files to review before a project starts, as part of a pre-contractual enquiry to see if you are able to work on the project.

In the event that a file contains personal data, we will use one of the following methods to transfer the file to you:

1. password protect the file, send it by email and send the password via SMS
2. send an anonymised excerpt from the file as a sample
3. upload the files to a secure portal and ask you to login to access them

If you decline the work, please delete the email and the files from your inbox and your deleted items, as well as from your computer and mobile device(s).

Do not download files using unsecured public wi-fi.

## During the project

**For Wolfestone Translation Projects:** if you are able to take the work, we will send you a link to the job in XTRF where the files will also be available to download. Please do not download the files if you have already downloaded them.

**For RLI Projects:** if you are able to take the work, we will send you a link to the Hub where the files will be available to download. Please do not download the files if you have already downloaded them.

Do not use any unauthorised CAT tools or software to process files, especially cloud-based or SaaS tools. If you wish to use your own CAT tool or software, you must contact the project manager and receive written authorisation that this is acceptable.

Make sure your computer is locked with a password or PIN if you need to take a break from working or are otherwise leaving your computer unattended.

If you are working in XTM, close the browser window if you are no longer using it.

If you have downloaded files, store these in a password protected folder.

Do not share the files with anybody else, unless explicitly asked to by the project manager as part of the project.

Do not send the files to yourself by email.

If you regularly back up files to an external device, make sure this device is encrypted and that the files are password protected.

Do not upload files using unsecured public wi-fi.

Do not print copies of the source files or your translation.

## After the project

If you are working in XTM click **I have finished the job** in the XTRF job manager.

**For Wolfestone Projects:** if you are working offline, upload the files, including the project TM if applicable, to the XTRF job manager.

**For RLI Projects:** upload the files, including the project TM if applicable, to the Hub

Do not send the files by WeTransfer, email, Skype or any other unauthorised transfer method. If you cannot upload the files to the XTRF job manager or the Hub, contact your project manager for immediate assistance.

Delete the source files and the TM or project files from your computer, backup storage media and mobile devices. You are not permitted to use TMs from Wolfestone projects to service other clients.

Wolfestone recognises that you may need to keep a copy of the files that you produce to fulfil legal obligations. In this case, we require that you redact personal information contained within the files and notify us of your data retention period and destruction methods.

## General Data Security precautions you should take

* Make sure your mobile devices and laptops are encrypted. Windows 10 includes encryption software called BitLocker which can encrypt your whole hard drive.
* Have a separate work account on your PC/laptop especially if other family members use it. Make sure this has a strong password.
* Password protect all your devices using strong passwords.
* Don’t send data over unsecured WiFi.
* Make sure your computer operating system and web browsers, office applications, etc. are up to date.
* Make sure you have firewall software and antivirus software installed (Windows Defender is fine).
* Install ‘shredding’ software to digitally shred documents before you delete them.

## Agreement:

I [name] agree to follow these data protection and security procedures when carrying out Wolfestone Holdings projects. I understand that failure to comply with these procedures could result in termination of working relations with Wolfestone Holdings. Where failure to comply has led to a data breach, I understand that I may be reported to the relevant data protection authorities in accordance with Wolfestone’s obligations under GDPR.

Data retention period for completed files: \_\_\_\_\_\_\_

Destruction method for files outside data retention period:\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signed

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date