

## **Guidance on the use of DeepL**

### **1. Purpose**

This document sets out the guidance and terms of use for DeepL. DeepL is a third-party online translation service that uses AI to provide machine translations between languages.

ISP is committed to complying with data protection laws, and all employees are expected to act in accordance with these obligations when using DeepL.

### **2. Permitted use**

You may use DeepL for the following approved purposes:

- [Translating non-sensitive educational, operational or administrative content
- Translating anonymised documents and templates]

### **3. Prohibited use**

You must never use DeepL to translate for the following purposes:

- Translating content that includes personal data or special category data
- Generating or translating inappropriate, misleading or offensive content
- Using the tool for personal projects, external consultancy or non-ISP purposes

### **4. Understanding personal data and special category data**

**"Personal Data"** includes any information that identifies or could identify a person. Examples include:

- Names
- Email or postal addresses
- Employee or student numbers
- National Insurance numbers
- Health, financial or family details

**"Special Category Data"** includes even more sensitive types of personal data, such as:

- Racial or ethnic origin
- Religious beliefs

- Trade union membership
- Genetic or biometric data
- Health or disability information
- Sexual orientation

**Important note:** Even if data appears anonymised, it may still be considered personal if an individual could be identified when combined with other available information. Always adhere to the principle of data minimisation – only use the absolute necessary information, and if personal data is present, you should remove it or redact it before translation.

### Examples of Prohibited Use

You must never input personal data or special category data. Doing so is a breach of this guidance and data protection principles.

Here are specific examples of prohibited use:

- Translating an email with an identifiable name:  
*"Dear Mr Smith, your payment of £500 is overdue. Please contact us at your earliest convenience."*
- Translating HR documents with employee details:  
*"Jane Doe, National Insurance Number AB123456C, has requested maternity leave from 1 June."*
- Translating case notes or reports with personal information:  
*"The student, aged 15, has a medical history including diabetes and high blood pressure."*

## **5. Intellectual property**

All translations and outputs generated through DeepL remain the intellectual property of ISP. These outputs must not be published or commercially exploited without authorisation.

## **6. Accuracy and reliability**

While DeepL is a high-quality translation tool, it may occasionally produce inaccurate or contextually inappropriate translations.

Before using any output from DeepL, you must review and, if necessary, revise the translation to ensure: a) accuracy, b) cultural and contextual relevance, c) suitability for the intended audience.

If you do not possess native or near-native fluency in the target language, you may not be equipped to adequately perform this review. In such cases, the DeepL translation should be considered a draft only. For any official, external, high-stakes or critical communication, a qualified human translator or a native-speaking colleague must review and approve the translation.

Responsibility for the final version rests solely with the user.

## **7. Monitoring and compliance**

ISP may monitor use of DeepL to ensure compliance with these terms and for quality assurance purposes. Any misuse, including entering personal data and using the tool for unauthorised purposes may result in restricted or withdrawn access at ISP's discretion.

## **8. Best practices**

- Ensure there is no personal data in the text to be translated.
- If you are uncertain whether text contains personal data, consult Group Legal before using DeepL.