

Comtec Translations Ltd

AI Policy Statement

Document Title	AI Policy Statement
Version	1.0
Date	June 2026
Owner	Technical Director
Review Cycle	Annual, or following material changes to AI usage
Classification	Public

1. Purpose and Scope

This AI Policy Statement explains how Comtec Translations Ltd (“Comtec”) uses Artificial Intelligence (AI) and Machine Translation (MT) technology within our language services. It is intended to give our customers, partners, and stakeholders a clear, honest, and practical understanding of our approach.

This policy applies to all AI-enabled services delivered by Comtec, including services provided through third-party technology partners and sub-contractors. It applies to all staff, contractors, and technology systems operating on behalf of Comtec within the scope of these services.

1.1 What This Policy Covers

- Where and why AI and machine translation are used in our services
- How human expertise remains central to quality assurance
- How customer data is protected when AI tools are used
- How we select and govern third-party AI technology providers
- How we ensure AI is used responsibly, ethically, and in compliance with applicable law
- What choices customers have regarding the use of AI in their projects

1.2 What This Policy Does Not Cover

This policy covers our customer-facing AI services. The use of AI tools for internal administrative purposes (such as meeting notetaking, scheduling, or internal communications) is governed separately by our internal AI Acceptable Use Policy.

2. Our Commitment

At Comtec we help you scale multilingual content by intelligently blending human expertise with customised AI. Our strategic approach to translation, ensures you get better results from your existing budget.

AI helps us enhance efficiency, consistency, and scalability. In human-reviewed services, AI is used to support our expert linguists, not replace them. Where customers select a fully automated service, this is made clear in advance, and the output is delivered without mandatory linguist review by Comtec.

We are transparent about when and how AI is used, and we give our customers meaningful choice about the level of AI involvement in their projects.

Our AI Principles

- **Transparency:** We are open about where and how AI is used
- **Human oversight:** AI does not operate without appropriate human control where required
- **Quality:** AI is used to enhance quality, with appropriate controls.
- **Data protection:** Customer data is handled safely and in compliance with UK GDPR
- **Accountability:** We take responsibility for outputs in line with the agreed service tier, including full quality responsibility for human-reviewed services
- **Customer choice:** Clients can choose the level of AI involvement that suits them

3. How We Use AI in Our Language Services

In the context of our language services, “AI” refers to a range of technologies used to assist our linguists, support translation workflows, and enhance efficiency and quality. These technologies are applied at different stages of the service lifecycle and are designed to complement professional human expertise rather than replace it.

The level of AI involvement varies depending on the nature of the content and the service selected by the customer.

How We Use AI – Comtec Translations

NMT	LLM	ASD	AI VO	QA
<p style="text-align: center; font-weight: bold; margin-bottom: 5px;">Neural Machine Translation</p> <p style="text-align: center; font-size: 12px; margin-bottom: 10px;">Machine Translation (MT)</p> <ul style="list-style-type: none"> NMT engines can be a useful solution for producing translations quickly and cost-effectively Useful for high-volume, repetitive, internal or lower risk content types Combined with human expertise in hybrid delivery models to ensure human control and quality assurance Can be combined with other AI technologies (such as LLMs) to produce semi or fully autonomous workflows with human guardrails 	<p style="text-align: center; font-weight: bold; margin-bottom: 5px;">Large Language Models</p> <p style="text-align: center; font-size: 12px; margin-bottom: 10px;">Generative AI translation</p> <ul style="list-style-type: none"> Generative AI models such as LLMs are trained on large corpora of text allowing content generation quickly and at scale An integral part of Pronto, our self-service automated translation platform combined with other language technologies such as NMT and TM Can be used as part of semi-autonomous workflows such as automated post-editing of Machine Translation or to support and enhance human-led MTPE workflows Careful analysis of performance and information security principles in deployment of technology Clients have ownership of level of AI involvement through tiered service offering 	<p style="text-align: center; font-weight: bold; margin-bottom: 5px;">Account Management & Service Delivery</p> <p style="text-align: center; font-size: 12px; margin-bottom: 10px;">Localisation-adjacent tasks</p> <ul style="list-style-type: none"> Generative AI models such as LLMs are used to support in the delivery of our services supporting a range of tasks. These include: <ul style="list-style-type: none"> Account Management, Sales and Marketing support Project preparation and internal service delivery activities Content analysis, summarisation and translation resource creation and maintenance Only business/project related content is used within the remit of the delivery of our service and outputs are carefully reviewed prior to use No sensitive data or special category data is intentionally used in these workflows nor is the data used to train or improve the models used 	<p style="text-align: center; font-weight: bold; margin-bottom: 5px;">AI Voice Services</p> <p style="text-align: center; font-size: 12px; margin-bottom: 10px;">Generative AI voiceover</p> <ul style="list-style-type: none"> Used as an alternative to traditional human voiceover Tiered service offering allowing clients to choose AI VO where applicable to their use cases Voices selected in the same way as human VO workflows allowing ownership of the workflows Fosters accessibility allowing clients to include VO more cost-effectively in their projects Human control and QA ensuring AI VO still meets client requirements in all deliverables 	<p style="text-align: center; font-weight: bold; margin-bottom: 5px;">Quality Assurance</p> <p style="text-align: center; font-size: 12px; margin-bottom: 10px;">AI-Assisted QA</p> <ul style="list-style-type: none"> Generative AI produces structured quality summaries and error reports Reports always reviewed and validated by linguist & QA teams Supports consistent quality benchmarking across projects Helps identify patterns in translation errors over time

3.1 Neural Machine Translation (MT)

Neural Machine Translation is used to generate initial translation drafts using neural models. NMT is particularly effective for high-volume, repetitive, or technical content where terminology and structure are well defined.

Unless a fully automated workflow is selected, NMT output is treated as a draft and is reviewed and refined by qualified linguists as part of a hybrid workflow, ensuring accuracy, appropriateness, and adherence to customer requirements.

3.2 Large Language Models (LLMs)

Large Language Models are generative AI systems trained on large text corpora. We use LLMs to support translation and post-translation activities, including AI translation, automated post-editing, and other language-related enhancements.

LLMs may be used on their own or in combination with machine translation technologies to improve fluency, contextual understanding, and efficiency, with appropriate safeguards and controls applied.

3.3 Account Management and Service Delivery

We use generative AI to support localisation-adjacent tasks across our account management and service delivery functions. These may include but not limited to activities such as terminology extraction, summarisation, prompt development, and style guidance, project preparation, client communication, linguist brief preparation, source file analysis, and proposal development.

AI-generated outputs produced in these contexts are reviewed by our internal teams or qualified linguists before use, ensuring they are suitable, accurate, and aligned with project requirements.

3.4 AI Voice Services

We offer generative AI voice services as an alternative to traditional human voiceover for clients who require scalable, efficient audio output.

The use of AI voice is agreed with customers in advance, and human oversight is applied to ensure outputs meet agreed quality, usability, and accessibility standards. Human voiceover alternatives can be requested where required.

3.5 AI-Assisted Quality Assurance

AI is used to support quality assurance processes by generating structured quality summaries and analytical insights across translation projects. These tools help identify patterns, support benchmarking, and guide areas for review.

All AI-assisted quality outputs are reviewed and validated by our linguist teams and are not used as the sole basis for quality decisions.

3.6 What AI Is Not Used For

We do not use AI to:

- Make automated decisions with significant legal or personal impact on individuals

- Replace professional human review where such oversight is contractually or operationally required
- Profile individuals or analyse personal data beyond what is necessary for service delivery
- Process sensitive personal data using uncontrolled or consumer-grade AI tools

4. Human Oversight and Quality Assurance

Human expertise remains at the core of our quality assurance process. The level of human involvement varies by service tier and is always clearly communicated to the customer before a project begins.

4.1 Human-Reviewed Services

In all human-reviewed service tiers, every translation is reviewed by a team of experienced, hand-picked linguists who ensure accuracy, cultural appropriateness, and fidelity to the intended tone and style. AI output is treated as a first draft, a starting point that the linguist verifies, corrects, and refines.

When you receive a human-reviewed translation from Comtec, you can be confident that:

- The translation has been reviewed by a team of one or more qualified linguists
- Accuracy, tone, and cultural context have been verified
- AI output has been treated as a draft and corrected where necessary
- The final translation meets our ISO-certified quality standards

4.2 Fully Automated Services (Pronto/Automated Post-Editing)

Where customers select a fully automated workflow—either through Pronto or via automated post-editing services—translations are delivered without mandatory linguist review by Comtec.

In these cases:

- Outputs are generated using AI-driven technologies and may vary in accuracy, completeness, and suitability depending on the nature of the content and the quality of the input provided
- The customer accepts full responsibility for independently verifying that all deliverables are accurate, complete, and appropriate for their intended purpose
- Comtec does not validate or verify AI-generated outputs unless additional, human-review services are expressly requested
- Comtec is not liable for errors, omissions, or consequences arising from the use of AI-generated content that has not been subject to human review

Customers are strongly advised not to use unreviewed AI output for content that may have legal, medical, safety, or regulatory implications without independent expert review.

Customers are also expected to use fully automated services responsibly and in accordance with applicable ethical and legal standards.

4.3 Quality Management System

All AI-enabled services operate within the Comtec ISO 9001-certified Quality Management System. AI-related risks are identified and managed as part of our wider risk management framework, and quality controls are reviewed periodically and following any material changes to our AI tooling.

5. Customer Service Options

We understand that every client has different priorities, requirements, and comfort levels with AI-assisted translation. We offer a range of service options so you can choose the approach that best fits your needs.

Before any project begins, we discuss your expectations with you, including quality standards, turnaround times, and the level of AI involvement. We will never apply AI to your content without your knowledge.

6. Data Protection and Privacy

Comtec takes the protection of customer data seriously. This section sets out how personal and confidential data is handled when AI tools are used in service delivery.

6.1 Lawful Basis for Processing

When processing personal data as part of translation services, Comtec acts as a data processor on behalf of our customers (as data controllers). We process personal data only in accordance with documented instructions from the customer and on a lawful basis under UK GDPR, typically:

- Performance of a contract, where processing is necessary to fulfil the agreed service
- Legitimate interests, for quality assurance and security monitoring purposes, where balanced against individual rights
- Legal obligation, where processing is required by applicable law or regulation

6.2 How Customer Data Is Used in AI Workflows

Customer content submitted for translation may be processed by AI systems as part of service delivery. Comtec ensures that:

- Content submitted via API integrations is encrypted in transit using TLS 1.2 or above
- For translation and post-editing workflows, content is processed transiently and is not retained in third-party AI systems beyond what is necessary for the immediate task.
- Where Comtec uses AI-assisted tools for account management, project preparation, and service delivery support, client content may be stored persistently within those tools for the duration of the business relationship or project. Such storage is subject to the controls set out in this policy, including encryption, access restrictions, and prohibition on use for model training.
- Customer content is not used to train or fine-tune AI models
- Where our customers provide us with sensitive personal data (as defined under UK GDPR Article 9) for translation services, we process that data solely on their documented instructions and subject to appropriate technical and organisational standards.
- Customers can ask us not to use AI for their translation work where they have a particular restriction. All exclusions are logged and tracked as part of our information security obligations under ISO 27001.

6.3 AI-Assisted Account Management and Service Delivery Tools

In addition to AI and machine translation tools used directly in translation workflows, Comtec uses AI-assisted tools to support account management, project preparation, and internal service delivery

activities. These tools may be used by our delivery management, operations, and sales teams to assist with tasks such as client communication, linguist brief preparation, source file analysis, and proposal development. For the purposes of this policy, “approved AI workspaces” means third-party or internal AI-enabled systems that have been approved by Comtec, contracted for business use, and subject to supplier due diligence, access controls, data protection terms, and retention requirements.

Where client content is used in these tools, the following controls apply:

- Only business-related content is used (such as project files, style guides, and professional communications). Comtec does not use sensitive personal data or special category data in these tools without appropriate safeguards
- Client content stored in these tools is retained only for the duration of the relevant project or business relationship, and is deleted in accordance with our data retention procedures
- Content is not used to train or improve AI models. All tools used are subject to a Data Processing Agreement and Comtec’s supplier due diligence process
- Access to client content within these tools is restricted to authorised Comtec staff involved in the relevant account or project

Where a client has expressly restricted the use of AI tools in connection with their account, Comtec will honour that restriction. Clients wishing to restrict or enquire about this use should contact us using the details in the Contact section of this policy.

6.4 Supplier Due Diligence

Before engaging any third-party AI or MT provider, Comtec conducts due diligence to assess the provider’s data protection practices, security standards, and contractual commitments. This includes:

- Review of the provider’s privacy policy, data processing terms, and security certifications
- Execution of a Data Processing Agreement (DPA) where Comtec acts as a data controller or sub-processor
- Assessment of where data is processed and stored, including cross-border transfer safeguards under UK GDPR
- Confirmation that customer content is not used for model training without consent

6.5 Sub-contractors

Where sub-contractors (including freelance linguists) access customer content as part of service delivery, they are required to be:

- bound by confidentiality obligations and data processing terms consistent with those Comtec holds with the customer
- included in the Comtec Record of Processing Activities (ROPA) where they act as sub-processors
- Comply with the Comtec information security requirements

6.6 Data Subject Rights

Where personal data is processed in connection with our services, data subjects may exercise their rights under UK GDPR, including the right to access, erasure, restriction, and portability. Requests should be directed to our Data Protection contact. Where Comtec acts as a data processor, we will promptly refer requests to the relevant data controller.

7. Security Controls

Comtec maintains strict security standards to protect customer data and ensure the integrity of AI-assisted workflows. Our security controls include:

- Encrypted data transfer using TLS 1.2 or above for all API-based AI and MT integrations
- Customer content is not used to train AI models. For transient processing workflows, content is not retained in third-party systems beyond the immediate task. For AI-assisted account management and service delivery tools, content may be stored persistently within Comtec's approved and contracted AI workspaces, subject to appropriate security controls and data retention policies
- Access controls and least-privilege principles applied to all systems processing customer data
- Defined data retention and deletion procedures in line with contractual and regulatory requirements
- Data Protection Impact Assessments (DPIA) carried out for all core systems in which Machine Translations are carried out.
- Supplier risk assessments and contractual safeguards for all AI and MT technology providers
- Regular internal security reviews and staff training on secure handling of customer data

All AI-enabled services operate within Comtec's ISO 27001-certified Information Security Management System (ISMS) and align with the UK Cyber Essentials standard, giving customers confidence that their information is handled safely and responsibly.

8. Use of Third-Party AI Technologies

Comtec uses a range of third-party AI and Machine Translation technologies to deliver our services. We do not build or operate our own foundational AI models. All third-party tools are selected, configured, and governed in accordance with this policy.

8.1 Selection Criteria

Third-party AI tools are assessed against the following criteria before use:

- Data protection and privacy standards, including compliance with UK GDPR
- Security certifications and audit history (e.g. ISO 27001, SOC 2)
- Terms of service, particularly in relation to data retention, hosting, and model training
- Contractual ability to enter into a Data Processing Agreement
- Technical capability to configure data handling settings in line with our requirements

8.2 Approved Use Only

Staff are strictly prohibited from using consumer-grade or uncontrolled AI tools, (such as public chatbot interfaces), to process customer content or sensitive organisational data. All AI tools used in service delivery must be approved for use through the Comtec internal governance process.

9. Responsible and Ethical AI Use

Comtec is committed to using AI responsibly. Our approach is grounded in the following principles:

Our Ethical AI Commitments

- **Transparency:** We are open with customers about where and how AI is used in their projects
- **Accountability:** We take full responsibility for the quality, security, and compliance of our outputs in human-reviewed services
- **Human Oversight:** AI does not operate without appropriate human control in managed workflows
- **Fairness:** We monitor AI tools for systematic bias and take corrective action where identified
- **Compliance:** We comply with UK GDPR, the Data Protection Act 2018, and relevant AI governance guidance from the ICO and UK government
- **Continuous Improvement:** We review our AI tools and practices periodically and update our policies accordingly

AI-related risks are identified and periodically reviewed as part of our wider information security and quality management processes. Our ISMS includes specific controls addressing the use of AI in service delivery.

10. Policy Governance and Review

10.1 Policy Owner

This policy is owned by the Comtec Technical Director, who is responsible for maintaining its accuracy and ensuring it reflects current practice.

10.2 Review Cycle

This policy is reviewed annually, or following any of the following trigger events:

- Material changes to the AI tools or technologies used in service delivery
- Changes to applicable law or regulation (including UK GDPR guidance from the ICO)
- Significant security incidents involving AI systems
- Feedback from customers, auditors, or certification bodies

10.3 Staff Training

All staff involved in AI-enabled services receive training on the responsible use of AI, data protection obligations, and the requirements of this policy. Training records are maintained as part of our ISMS.

10.4 Incident Management

Any security incidents, data breaches, or quality failures involving AI systems must be reported immediately to the Technical Director in accordance with the Comtec incident management procedure. Where a breach involves personal data, we will notify the ICO and affected individuals as required under UK GDPR.

11. Contact and Further Information

If you have questions about how we use AI in our services, how your data is handled, or if you wish to exercise your data subject rights, please contact:

Contact	Technical Director
Email	IT@comtectoanlations.com
Address	Comtec Translations Ltd, 3 Pegasus House, Pegasus Court, Olympus Avenue, Warwick, CV34 6LW
Privacy Policy	www.comtectoanlations.co.uk/privacy

For further information about our certifications, quality standards, and service offering, please visit www.comtectoanlations.co.uk.

Please refer to our Privacy Policy for further information about data protection.