



## PRIVACY POLICY

At Sterling Transcription<sup>1</sup>, we recognise the importance of our clients' privacy and confidentiality. As such, we are committed to providing and maintaining industry leading confidentiality and security standards.

Sterling Transcription adheres to the Privacy and Electronic Communications (EC Directive) Regulations 2003, the Data Protection Act 1998 and the Telecommunications (Data Protection and Privacy) Regulations 1999. We are also compliant with guidelines issued by the Information Commissioner's Office, particularly in relation to Sterling Transcription's role as a data processor.

In ensuring a maximum level of privacy, Sterling Transcription undertakes various measures, including but not limited to:

### Secure Website

Sterling Transcription maintains a secure online website to which clients can upload information and audio. All access to the site is fully auditable via IP number, and the secure server uses bank grade RSA 2048 bit encryption keys. All client accounts are password protected and clients can set their own passwords which are stored in a secure encrypted format.

### Limited use of Personal Information

Sterling Transcription may disclose such personal information as is necessary for the performance of the transcription services:

- to any person(s) where necessary in connection with the provision of our products or services, only when that that person(s) is subject to a confidentiality agreement in compliance with the Privacy and Electronic Communications (EC Directive) Regulations 2003, the Data Protection Act 1998 and the Telecommunications (Data Protection and Privacy) Regulations 1999;
- where required or authorised by law; and
- where you consent to the disclosure.

<sup>1</sup> Sterling Transcription is a registered trading name of Pacific Solutions Pty Ltd, a company incorporated in Australia. (ABN 67 100 292 171)



Sterling Transcription retains a world-wide network of experienced and highly-skilled typists, all of whom are subject to the same quality expectations and contractual arrangements.

In the course of providing transcription services, information may be passed to other jurisdictions including New Zealand, Australia, Spain, South Africa, France, the United States of America, the Philippines, India and others.

By using our transcription services, clients consent to the disclosure of personal information to our world-wide network of service providers. Clients are advised to notify Sterling Transcription prior to the commencement of transcription if work must be performed in one or more specific jurisdiction(s).

#### **Personal Information - Research, Finance, Media**

##### **Personal Information Collected**

- Contact details (Full name, email, telephone number, address)
  1. The information is provided by the client and is available to be viewed and amended by the client via their personal account.
  2. The information is used for the purposes of contacting the client in relation to the performance of transcription services and for invoicing.
  3. Information recorded within completed transcripts as a result of the transcription process is not collated or analysed by Sterling Transcription.

#### **Personal Information - Medical (Standard)**

##### **Personal Information Collected**

- Contact details (Full name, email, telephone number, address)
  1. The information is provided by the client and is available to be viewed and amended by the client via their personal account.
  2. The information is used for the purposes of contacting the client in relation to the performance of transcription services and for invoicing purposes.
  3. Information recorded within completed transcripts as a result of the transcription process is not collated or analysed by Sterling Transcription.

#### **Personal Information - Medical (Practice Management Software Integration)**

In addition to the collection of basic contact details as outlined above in Personal Information - Medical (Standard), medical clients who request **Practice Management Software Integration** provide to Sterling Transcription information relating to patient names and addressee details in order for the transcription services to be provided.

This information is uploaded by the client directly to their client account, and is not collated or analysed. This information is routinely updated and the information is not recorded anywhere other than in completed transcripts.



## Medical Records and Health Records Information Privacy

Medical records require additional safeguards to protect the sensitive and personal nature of the information they contain. Sterling Transcription recognises the importance of privacy to medical clients, and has implemented a number of streamlined processes to ensure the upmost security of information for these clients. Privacy is considered a key element of Sterling Transcription's service delivery, and as such is monitored closely by the Managing Director.

As a specialised medical transcription company, Sterling Transcription is dedicated to maintaining open communication with clients and typists to ensure all privacy requirements are met. Sterling Transcription also allows full client access to operating systems to demonstrate the strength and integrity of security and privacy procedures.

Central to this are Sterling Transcription's dedicated medical transcription team. This team includes experienced typists and quality managers, who are familiar with the Sterling Transcription privacy policy and relevant statute and individual client requirements.

## Employee and Subcontractor Confidentiality Agreements

All employees of, and subcontractors to, Sterling Transcription sign a confidentiality agreement before the commencement of work. This agreement complies with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth), Health Insurance Portability and Accountability Act (HIPAA USA), Information Commissioner's Office directives and New Zealand privacy standards.

## Document Return

Completed documents are returned by default via upload to the client account on our secure website, thus restricting access to those holding the login and password details. This method is protected by standard HTTPS protocol. If preferred, documents can be returned via email in addition to being uploaded.

## Audit Trail

All activity on the Sterling Transcription secure website is fully auditable by Sterling Transcription. Access to client and file information is strictly managed through the use of access level management and password protection. Both typist and administrative activity is recorded, providing a complete audit trail of when and by whom audio and documents are accessed.



## Purging of Documents

Completed transcripts are stored in the personal account of the client for approximately one month after publication before being purged. The file is then held on the secure Sterling Transcription server for a period of approximately one year before being deleted.

Clients may request that completed transcripts are retained for a shorter period of time, and file archival services are also available.

## International Clients and Files

Pacific Solutions Pty Ltd is an Australian company that trades in the UK as Sterling Transcription. The Australian Privacy Principles are compliant with Health Insurance Portability and Accountability Act (HIPAA USA), directives from the Information Commissioners Office (UK) and New Zealand privacy standards. Non-disclosure agreements are available on request.

The transfer of files between countries is carried out in accordance with the Australian Privacy Principles.

## Complaints Process

Any concerns or questions regarding Sterling Transcription's Privacy Policy and practices can be submitted in writing via email at [enquiries@sterlingtranscription.co.uk](mailto:enquiries@sterlingtranscription.co.uk) or by post to 78 York Street, London, W1H 1DP.

Once a complaint has been received a Sterling Transcription team member will contact the submitter within 1-2 working days.

Sterling Transcription recognises the importance of privacy and security of information and all concerns and questions are investigated and responded to as appropriate and in a timely manner.