



## PRIVACY POLICY

At Sterling Transcription<sup>R</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 General Data Protection Regulation, the Data Protection Act 1998 and the Telecommunications (Data Protection and Privacy) Regulations 1999. We are also compliant with guidelines issued by the UK Information Commissioner's Office, particularly in determining our obligations as both a data controller and data processor.

Sterling Transcription is dedicated to maintaining open communication with clients and typists to ensure that all of your information privacy and confidentiality requirements are met.

Privacy is considered a key element of Sterling Transcription's service delivery, and as such is monitored closely by the Managing Director.

### 1. Personal Data We Collect and Process

Sterling collects personal data that is necessary to set up your client account, and to provide you with transcription services. We also hold your audio files and transcribe them in accordance with your instructions.

#### 1.1. Information We Collect from You

**Client Account Details** – We collect details of your name, organisation, address, phone number, email address and username upon the creation of your client account. You provide these personal details when registering for an account via our [Self-Registration Form](#), or by contacting us at Sterling Transcription to create an account on your behalf.

**Customer Enquiry Records** – We record important points that arise in our communications with you, such as your transcription requirements and past queries. This information is collected through your engagements with us via the [Enquiries Form](#), over the phone or by email to [enquiries@sterlingtranscription.co.uk](mailto:enquiries@sterlingtranscription.co.uk) or [operations@sterlingtranscription.co.uk](mailto:operations@sterlingtranscription.co.uk).

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



## 1.2. Your Audio and Transcript Files

After you upload your audio files via your client account, we hold and process them for transcription on your behalf. Your source audio files and resulting transcripts **may** contain your personal data or the personal data of others.

Sterling Transcription does **not** collate or analyse the information recorded within client audio files or resulting transcripts. Sterling Transcription will nevertheless take the precaution of treating all files as though they contain personal data for the purposes of the GDPR.

For further information about lawful bases under which we collect your personal data for the purposes of the GDPR, see below (7. General Data Protection Regulation).

## 2. How We Use and Process Your Personal Data

### 2.1. Information We Collect from You

Sterling Transcription uses **client account details** for the purpose of providing you with transcription services. For example, we use this information to provide you with a unique username and client account through which we provide our services, and for contacting you in relation to invoicing, confirming your transcription requirements, or advising you when a transcription task is complete.

Sterling Transcription uses **customer enquiry records** for the purposes of recording your instructions and transcription requirements, in order to provide you with accurate and efficient transcription services and continuity in our customer service and client support.

In terms of **marketing and promotional updates**, you have the option to add the email address attached to your client account to our promotional email list. We will only send you promotional emails if you opt-in to this upon creating your account, or in the 'Edit Profile' tab in your Client Account. You may unsubscribe at any time in the 'Edit Profile' tab in your Client Account.

### 2.2. Your Audio Files and Transcripts

We process your audio files for the exclusive purpose of providing you with transcription services. Sterling Transcription does **not** collate or analyse the information recorded in client audio files or the resulting transcripts.





### 2.3. Disclosure of Your Personal Data and Sub-Contractors

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

We may disclose your personal data (see '1. Personal Data We Collect and Process') to subcontracted typists where necessary in connection with the provision of our products or services, and only when the subcontractor is subject to an agreement in compliance with the General Data Protection Regulation. We may also disclose your personal data where required or authorised by law, and where you consent to the disclosure.

By using our transcription services, you consent to the disclosure of your audio files and transcripts to our network of typist 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 jurisdictions.

## 3. Personal Data Processing Within the EU

To provide comfort and security of continued operations upon commencement of the GDPR, we have established a secure server in the European Union and a mechanism to ensure that all processing of your files will be undertaken **exclusively** by typists, proofers and quality assurance personnel located within the European Union, at no increase of service cost.

However, it is our ultimate intention to put in place further measures which allow us to process your files outside the European Union if necessary, and **most importantly**, in compliance with the GDPR. This is necessary to leverage our core strength of working across multiple time zones and using our highly skilled world-wide resources located in locations such as Australia, New Zealand, the Philippines, India, the United States of America, South Africa, etc.: the same resources which have been instrumental in delivering secure, high quality solutions for over 10 years.

We are in the process of consulting with both data protection specialists and the UK Information Commissioner's Office (ICO) to ensure that any such arrangement would be GDPR compliant. We anticipate that later this year we may have updated Terms to enable GDPR-compliant transfers outside the European Union. We shall communicate with you further at that time.



## **4. Confidentiality and Data Security**

In ensuring the confidentiality and privacy of your personal data and files, Sterling Transcription undertakes various measures, including but not limited to:

### **4.1. 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 set their own passwords which are stored in a secure encrypted format.

### **4.2. Access Level Management and 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. Sterling Transcription also periodically audits the systems and processes of subcontracted typists for compliance with GDPR data security principles.

### **4.3. Employee and Subcontractor Confidentiality Agreements**

All employees of, and subcontractors to, Sterling Transcription sign a confidentiality agreement in compliance with the General Data Protection Regulation before the commencement of work. Non-disclosure agreements are also available on request.

### **4.4. Document Return**

Completed documents are returned by default via upload to the client account on our secure website. This method is protected by standard HTTPS protocol. If preferred, documents can be returned via email in addition to being uploaded.





## 5. File Retention Period and Purging

Your audio files and completed transcripts are stored in your personal account for approximately one month after publication, after which point the files are purged from our systems.

Unless agreed otherwise, the files are then archived. Files may be retrieved during this time for a small retrieval fee, outlined in the rates brochure.

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

## 6. Accessing or Amending Your Personal Data and Data Protection Requests

You are able to view and amend your **client personal details** in the 'Edit Profile' tab of your personal account.

If you have **any** enquiries or requests about our data handling practices, or wish to submit a request to access, amend or delete any of your personal data held by Sterling Transcription, please don't hesitate to contact our Data Protection Officer at [dataprotection@pacificsolutions.com.au](mailto:dataprotection@pacificsolutions.com.au).

We will endeavour to respond to you within one week, and guarantee that we will respond within 30 days.

## 7. General Data Protection Regulation

Please be aware of the following issues which are required to be addressed in our Privacy Notice for the purposes of the GDPR. Should you require any further clarification regarding this information, don't hesitate to contact us (see '6. Accessing or Amending Your Personal Data and Data Protection Requests).

### 7.1. Sterling Transcription's Controller and Processor Obligations

For the purposes of the GDPR we incur the following obligations, depending on the type of personal data or personal information in question:

- **Data Controller** – We are the data controller in respect of your **client account details** and **customer enquiry records**.
- **Data Processor** – We are the processor of your **audio** and **transcript** files, and you as the client are the 'controller' of such files.



## 7.2. Lawful Bases for Processing Personal Data

At least one of the lawful bases set out in Article 6 of the GDPR must apply in relation to a given processing activity. The lawful bases for Sterling Transcription's processing activities are as follows:

- **Client Account Details** – Collection is necessary for the performance of a **contract** (to provide you with transcription services).
- **Promotional Emails – Opt-in consent** in accordance with the GDPR and Privacy and Electronic Communications Regulations (PERC).
- **Client Audio and Transcript Files** – Processing is necessary for performance of a **contract** (to provide you with transcription services).
- **Customer Enquiry Records** – Collected for our **legitimate interests**, namely to record your instructions and transcription requirements, to be able to provide you with more accurate and efficient transcription services and continuity in our customer service.

## 7.3. European Privacy Rights

Sterling Transcription adheres to applicable data protection laws in the EU, which includes respecting the following privacy rights:

- If the processing of personal data is based on your consent, **you have a right** to withdraw consent at any time for future processing (e.g. our Promotional Emails);
- **You have a right** to request from us **access** to, **rectification** or **erasure** of your personal data, in circumstances where we operate as a “data controller” as defined in the law;
- **You have a right** to object to the processing of your personal data, especially where we collect your personal data for claimed legitimate interests; and
- **You have a right** to lodge a complaint with a European data protection authority, such as the Information Commissioner's Office (UK).