

Privacy Policy

At Sterling Transcription¹ we recognise the importance of our clients' privacy and confidentiality. We have been delivering secure and confidential transcription work for over 20 years and are committed to providing and maintaining industry leading confidentiality and security standards.

We hold certification to both ISO9001² and ISO27001³, which gives our clients comfort that our processes for both ensuring consistent quality and maintaining the security and confidentiality of information we process, is being regularly externally bench-marked and evaluated against current best practice worldwide.

Sterling Transcription adheres to the UK General Data Protection Regulation⁴, the EU General Data Protection Regulation⁵, the Data Protection Act 2018⁶, and the Privacy and Electronic Communications (EC Directive) Regulations 2003⁷. 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 data protection 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.

If you have any special requests regarding your data security and confidentiality requirements, such as the signing of non-disclosure agreements, please don't hesitate to get in contact with us (see below – '5. Accessing or Amending Your Personal Information and Data Protection Requests').

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

² ISO9001 is the international best practice standard for quality management systems.

³ ISO27001 is the international best practice standard for information security.

⁴ The UK General Data Protection Regulation (UK GDPR) refers to legislation deriving from the Data Protection Act.

⁵ The General Data Protection Regulation (EU) 2016/679 (GDPR) is a regulation in EU law on data protection and privacy for all individual citizens of the European Union (EU) and the European Economic Area (EEA).

⁶ The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR), and controls how personal information is used by organisations, businesses or the government.

⁷ The Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR) are UK regulations which give people specific privacy rights in relation to electronic communications. Derived from European law, PECR sit alongside the Data Protection Act and the GDPR, and implement European Directive 2002/58/EC, also known as 'the e-privacy Directive'.

1. Confidentiality and Data Security Measures

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

1.1. Secure Website and Server

Sterling Transcription utilises Australia-based instances of the Microsoft Azure cloud network. Features of this environment include:

- A primary protection layer, which includes deployment of a high-specification Fortigate Firewall appliance, fully optimised with IPS/IDS,
- A secondary layer of protection with the existence of a demilitarised zone (DMZ) which separates all file servers from public access points via deployment of a reverse proxy server,
- Utilisation of Microsoft Entra ID cloud-based identity and access management solution, as well as protection by Microsoft Defender for Business, and
- Configuration of the environment to include encryption of all files at rest, with a high-level AE256 encryption algorithm.

Additional to these features are cloud-to-cloud, real-time backups which mean that Sterling Transcription has disaster protection and recovery plans for its operating environment that has World-class metrics for Recovery Point Objective (RPO – or time interval during which data is potentially exposed to loss), and Recovery Time Objective (RTO – or how quickly full operational systems can be restored).

Access to the client portal is auditable via IP number. Client accounts are password protected and clients can set their passwords, which are stored in a secure encrypted format.

1.2. 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 UK and EU GDPR data security principles.

1.3. Security Screening of Personnel

Every person involved in the provision of service via Sterling Transcription undergoes careful screening and evaluation for both skill and suitability. With respect to security,

this process includes both reference checking and a search of criminal history. Every person engaged by Sterling Transcription must have and maintain a clear criminal history.

1.4. Employee and Subcontractor Confidentiality Agreements

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

1.5. 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.

2. Personal Information That We Collect and Process

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

2.1. Information Collected 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 our websites enquiries webforms, over the phone, or by email.

2.2. 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 information or the personal information of others.

Sterling Transcription does **not** collate or analyse the information recorded within client audio files or resulting transcripts. Sterling Transcription takes the precaution of treating all client audio and transcript files as though they contain personal information, and thus all files are handled in accordance with both the UK and EU GDPR.

For further information about the lawful bases under which we collect your personal information for the purposes of both the UK and EU GDPR, see below ('7. Further GDPR Matters').

3. How We Use and Process Your Personal Information

3.1. Information Collected 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, 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 by updating the 'Profile' tab within your Client Account. You may unsubscribe at any time in the 'Profile' tab of your Client Account.

3.2. Disclosure of Your Personal Information and Subcontractors

Sterling Transcription retains a worldwide 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 information (see '2. Personal Information That 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 a sub-processing agreement in compliance with both the UK and EU GDPR.

By using our transcription services, you consent to the disclosure of your audio files and transcripts to our network of typist service providers. Sterling Transcription can isolate client files within its systems such that the files are only able to be accessed by people resident within a particular jurisdiction. Clients are advised to notify Sterling Transcription prior to the commencement of transcription if work must be performed exclusively in one or more specific jurisdiction(s).

We may also disclose your personal information if required or authorised by law, or where you specifically consent to the disclosure.

4. File Retrieval/Archiving

4.1. Purging

For security and confidentiality purposes, unless archiving is requested by a client, Sterling Transcription purges all client transcripts and audio files from client accounts approximately one month after completion of the transcript.

4.2. Secure Backup and File Retrieval

Unless agreed otherwise, a secure backup of completed work is maintained. Where possible, files may be retrieved from this secure area for a small retrieval fee, outlined in the rates brochure.

4.3. Archiving

Sterling Transcription's archiving service keeps completed transcripts (and, by negotiation, audio) on Sterling Transcription's server, for as long as the archiving fee continues to be paid by the client.

4.4. Periodic Purging

Periodic purging of files can also be arranged.

5. Accessing or Amending Your Personal Information and Data Protection Requests

You can view and amend your **client personal details** in the 'Profile' tab of your personal account.

You may also submit a request to access, amend, or delete any of your personal information held by Sterling Transcription (see below – 6. Contact Us).

6. Contact Us

If you have any enquiries or complaints about our data handling practices, or have any reasonable requests regarding your data security and confidentiality requirements, please don't hesitate to contact our Data Protection Officer at dataprotection@pacificsolutions.com.au. We will endeavour to respond to you within one week and guarantee that we will respond within 30 days.

7. Further GDPR Matters

Please be aware of the following issues which are required to be addressed in our Privacy Notice for the purposes of both the UK and EU GDPR. Should you require any further clarification regarding this information, don't hesitate to contact us (see '5. Accessing or Amending Your Personal Information and Data Protection Requests').

7.1. Sterling Transcription's Controller and Processor Obligations

For the purposes of both the UK and EU 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 Information

At least one of the lawful bases set out in Article 6 of both the UK and EU 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 (PECR).
- **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. GDPR Privacy Rights

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

- 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,
- 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 **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 data protection authority, such as the Information Commissioner's Office (UK).

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Providing Legal, Medical, Government, Academic, Research, Media, & Financial Transcription Services To United Kingdom, Republic of Ireland, & European Businesses.

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