

Privacy Policy

At Expedict¹ we recognise the importance of our clients' privacy and confidentiality. We have been delivering secure and confidential transcription work for over 15 years and are committed to providing and maintaining industry leading confidentiality and security standards. We have already been accredited towards ISO9001² and are currently working towards Cyber Essentials³ certification.

Expedict adheres to the General Data Protection Regulation⁴ and the Data Protection Act 2018⁵, and the Privacy and Electronic Communications (EC Directive) Regulations 2003⁶. 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.

Expedict 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 Expedict's service delivery, and as such is monitored closely by the Managing Director.

If you have any special requests regarding your data protection and confidentiality requirements, such as the signing of non-disclosure agreements, please don't hesitate to get in contact with us (see below – '6. Accessing or Amending Your Personal Data and Data Protection Requests').

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

² ISO9001:2015 is the international best practice standard for quality management systems.

³ Cyber Essentials is an internationally recognised certification which demonstrates the international best practice standards for cyber security.

⁴ 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).

⁵ 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.

⁶ 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, Expedict undertakes various measures, including but not limited to:

1.1. Secure Website and Server

Expedict maintains a secure online website to which clients can upload information and audio files. All access to the site is fully auditable via IP number, and the secure server uses bank grade RSA 2048-bit encryption keys. Expedict's servers are monitored continuously and scanned daily to detect malware and prevent attacks, and server and website backups occur daily.

All client accounts are password protected and clients can set their own passwords which are stored in a secure encrypted format.

1.2. Access Level Management and Audit Trail

All activity on the Expedict secure website is fully auditable by Expedict. 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. Expedict also periodically audits the systems and processes of subcontracted typists for compliance with GDPR data security principles.

1.3. Employee and Subcontractor Confidentiality Agreements

All employees of, and subcontractors to, Expedict 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.

1.4. 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 Data We Collect and Process

Expedict 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 by contacting us at Expedict 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 over the phone or by email to support@expedict.co.uk or operations@expedict.co.uk.

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. Expedict does **not** collate or analyse the information recorded within client audio files or resulting transcripts. Your source audio files and resulting transcripts **may** contain your personal information or the personal information of others.

Expedict nevertheless takes the precaution of treating all client audio and transcript files as though they contain personal data for the purposes of the GDPR.

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

3. How We Use and Process Your Personal Data

3.1. Information Collected from You

Expedict 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.

Expedict 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 within your Client Account. You may unsubscribe at any time in the 'Edit Profile' tab of your Client Account.

3.2. Your Audio and Transcript Files

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

3.3. Disclosure of Your Personal Information and Sub-Contractors

Expedict 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 data (see '2. 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 a sub-processing agreement in compliance with the GDPR.

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 Expedict 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. Standard and EU-Only Processing

As of 01 October 2018, Expedict offers our clients two alternatives as to where client files are processed:

- A) Standard Processing** - The standard processing option leverages typing, proofreading and quality assurance resources from our world-wide network of employees and contractors. Any processing undertaken outside the European Union is GDPR compliant, and clients' files are subject to the same level of quality assurance as the EU-Only Processing option.



- B) EU-Only Processing** - Offers clients the option of having all typing, proofreading and quality assurance work performed exclusively within the EU, and client files are stored on EU-based servers. Due to the significant operational inefficiencies imposed by use of EU-Only resources, higher prices apply for use of the EU-Only service - please refer to our current Expedict rate sheet for further details.

5. File Retention Period and Purging

Completed transcripts are stored in client accounts for approximately one month after return. After this point, your audio and transcript files are purged from our readily accessible systems and your client account.

Archived copies of audio and transcripts are maintained for a period of time for quality assurance purposes unless otherwise agreed with clients. 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.

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 Expedict, 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 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. Expedict'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 Expedict'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

Expedict adheres to applicable data protection laws in 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 European data protection authority, such as the Information Commissioner's Office (UK).