

PRIVACY POLICY

At Pacific Transcription¹, 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.

Pacific Transcription is compliant with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) as well as the Guidelines on Privacy in the Private Health Sector issued by the Federal Privacy Commissioner under the Privacy Act 1988 (Cth). These are available to view at: www.privacy.gov.au.

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

Secure Website

Pacific Transcription maintains a secure online website, housed at NEXTDC Brisbane, in the CBD (<http://www.nextdc.com/data-centres/b1-brisbane-data-centre>), to which clients can upload information and audio. All access to the site is auditable via IP number, and a DSD-approved cryptographic algorithm is used throughout. 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

Pacific 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 Australian Privacy Principles;
- where required or authorised by law; and
- where you consent to the disclosure.

Pacific 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, Spain, the United Kingdom, South Africa, France, the United States of America, the Philippines, India and others.

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



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 Pacific 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 Pacific 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 Pacific 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 Pacific 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.

Personal Information - Medical (Practice Integration - VPN or Remote Access)

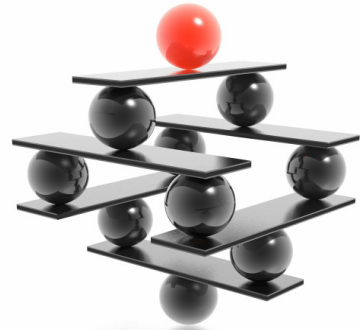
In addition to the collection of basic contact details as outlined above in Personal Information - Medical (Standard), medical clients who request **Practice Integration via VPN or Remote Access** allow Pacific Transcription to access their systems in order to complete the transcription services.





The information accessed and used to complete the transcription services is not recorded by Pacific Transcription, with patient and/or addressee information accessed via the client's system not retained by Pacific Transcription.

NB: Transcription services performed for **Radiology** clients occur entirely on the client's systems, with no copy of the completed transcript retained by Pacific Transcription.



Medical Records and Health Records Information Privacy

Medical records require additional safeguards to protect the sensitive and personal nature of the information they contain. Pacific 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 Pacific Transcription's service delivery, and as such is monitored closely by the Managing Director.

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

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

Employee and Subcontractor Confidentiality Agreements

All employees of, and subcontractors to, Pacific Transcription sign a confidentiality agreement before the commencement of work. This agreement is in compliance with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth).

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 Pacific Transcription secure website is fully auditable by Pacific 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 Pacific 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

The Australian Privacy Principles are compliant with Health Insurance Portability and Accountability Act (HIPAA USA), directives from the Information Commissioner's Office (UK) and NZ privacy standards. Non-disclosure agreements are available on request.

Complaints Process

Any concerns or questions regarding Pacific Transcription's Privacy Policy and practices can be submitted in writing via email at enquiries@pacificttranscription.com.au or by post to PO Box 745 Indooroopilly 4068.

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

Pacific 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.