



## EZSMART PRIVACY POLICY

### **Your personal data – what is it?**

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation 2016/679 (the "GDPR").

### **Who are we?**

EZSmart Transcription Solutions Ltd is a Transcription company and digital dictation solution provider. In this document, the words "we", "us" and "our" refer to the EZSmart Transcription Solutions Limited (the "EZSmart Transcription Solutions Limited").

In relation to GDPR we are:-

1. Primarily a Data Processor of its Clients and Client's end-customer's data
2. We are a Data Controller with respect to the holding of our Client data (Names, address, email and contact details). Client data is held primarily for billing and support purposes and occasional marketing of our products and service updates.

### **How do we process your personal data?**

EZSmart is both a Data Controller and a Data Processor. EZSmart complies with its obligations under the GDPR and previously the Data Protection Act by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data. EZSmart will never sell on your data to any third party.

### **EZSmart Non/limited disclosure policy**

EZSmart promotes to its Customers a Non-Disclosure Policy (NDP) by encouraging its Client's, Contractors and Affiliates to not disclose any data where possible to the fulfilment of the service provided.

NDP promotes the use of anonymized data, pseudonyms, password protection, encrypted technology and secure and robust technology to process data.

## **EZSmart Website links**

This websites [www.EZSmart.co.uk](http://www.EZSmart.co.uk) & [www.transcriptionservices.co.uk](http://www.transcriptionservices.co.uk) may contains links to other sites. This privacy statement only applies to information collected by us on our website directly. We are not responsible for the privacy practices and policies of these third parties sites.

## **We use your personal data for the following purposes: -**

1. As **Data Processor** for transcribing the Client's and Client's Customer Audio into text documents.
2. As a **Data Controller** to issue invoices for accounting and billing purposes. To hold your personal or company data for purposes of billing and marketing and service updates only.

This statement discloses our privacy practices and policies relating to EZSmart Transcription Solutions Limited.

## **What is the purpose of processing the Data**

EZSmart's team of transcribers will transcribe audio files in to typed written text for its Clients. Audio files are delivered and returned via EZSmart secure servers for processing. For further details on security please request a copy of our Security Policy The purpose is to the deliver the services that its Clients have requested.

The EZSmart team consisting of employees and sub-contractors and vendors whom adhere to our Privacy Policy and the relevant data protection and GDPR obligations where appropriate.

## **Sharing your personal data**

Your personal data will be treated as strictly confidential, and will be shared only with its staff and sub-contractors only.

## **How long do we keep your personal data?**

We keep your personal data (Name, Address, Email details) for as long as you remain a Client of EZSmart. Transcribed documents and audios are retained in most cases for 60 days; Post 60 days the files are automatically deleted from the servers via automatic purge programming.

## **Your rights and your personal data**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

1. The right to request a copy of your personal data which the EZSmart holds about you;
2. The right to request that the EZSmart corrects any personal data if it is found to be inaccurate or out of date;
3. The right to request your personal data is erased where it is no longer necessary for EZSmart to retain such data;
4. The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) Only applies

where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means.

5. The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
6. The right to lodge a complaint with the Information Commissioners Office.

### **Transfer of Data Abroad**

EZSmart may employ the services of Sub-contractors and Vendors based in countries outside the EU. EZSmart will work only with vendors whose security policy is mirrored and if not more enhanced than its own robust policies. EZSmart will provide copies of safeguard policies employed by its subcontractors and vendors on request. EZSmart will regularly audit its vendors and sub-contractors with physical inspection and remote inspections.

### **EZSmart Website Log-in accounts and forms**

We may ask for your name, email address and telephone number when you make an enquiry in order to be able to get back in contact with. If you, at this stage, choose to opt in to receiving communications from us, your data will be stored. This information will never be shared or sold with any third parties. You are able to ask to be removed from our mailing list at any time.

If you contact us, or we contact you, we may keep a record of that correspondence for our own records to fulfill any obligations to demonstrate GDPR compliance or any other relevant legislation.

### **Personal information we collect automatically**

When you use our Website we may from time to time automatically receive and record information on our server logs from your browser or mobile platform, including your location, IP address, cookie information, and the page you requested.

We treat this data as non-Personal Information, except where we are compelled to do otherwise by law or legal authority.

### **Cookies**

1. We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:
  2. To estimate our audience size and usage pattern.
  3. To store information about your preferences, and so allow us to customise our site according to your individual interests.
  4. To speed up your searches.
  5. To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

## Where We Store Your Personal Data

All data you provide to us is stored on our secure servers.

The data that we collect from you will be transferred to, and stored at, a destination inside the European Economic Area (“EEA”). The server will be accessed by authorized third parties vendors or sub-contractors only outside the EEA for the performance of the Client contract. The authorised third parties run parallel GDPR polices with EZSmart in respect of levels of security and data protection as well as data deletion polices currently set at 60 days for audio and transcript files. We will take all steps reasonably necessary to ensure that your data is treated securely as strictly confidential and in accordance with this privacy policy.

EZSmart employs secure access to its servicers via all its many file delivery methods made available to its Clients in accordance with the latest recognized standards.

If you have any questions about these practices and policies, please contact our DPO Officer directly on [info@EZSmart.co.uk](mailto:info@EZSmart.co.uk)

## Contact Details

To exercise all relevant rights, queries of complaints in the first instance contact the EZSmart Data Protection officer Bobby Gill on 02071110960 or email [info@EZSmart.co.uk](mailto:info@EZSmart.co.uk).



4

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EZ Smart Transcriptions Solutions Limited  
is a company registered in  
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