



## 1st CLASS SECRETARIAL SERVICES

### PRIVACY Notice FOR clients

#### **WHO WE ARE**

Lawson Hardwick Limited (trading as 1st Class Secretarial Services) deliver fast, accurate and confidential digital audio transcription services to a wide range of private firms, government agencies, health providers, not-for-profits, educational institutes, students and other individuals.

The services provided by the Company include the transcription of data provided by our clients for us to process on their behalf as agreed in writing between the client and ourselves. When we do so we are regulated under the General Data Protection Regulation (GDPR) which applies across the European Union (including in the United Kingdom) from 25 May 2018 and we are responsible as 'processor' of that personal information.

#### **THE PERSONAL INFORMATION WE USE**

##### **Information provided to us**

Personal information means any information about an individual from which that person can be identified. It does not include information where the identity has been removed (anonymous information).

In the course of our work, we may process, by following documented instructions from a Data Controller, the following personal information which we have grouped together as follows:

- Identity Information including first name and last name.
- Contact Information including current residential address.
- Special category Information including details of race, ethnic origin, politics, religion, trade union membership, genetics, biometrics, health, sex life or sexual orientation

1st Class Secretarial Services expect that all Data Controllers to whom we provide contracted processing services are fully compliant with GDPR and have established a lawful basis for collecting the personal data they are requesting we process.

##### **How we use personal information**

As Data Processors, we decide how we manage personal data on behalf of the Data Controller in the following ways:

- what IT systems or other methods to use to process personal data;
- how to store the personal data;
- the detail of the security surrounding the personal data;
- the means used to transfer the personal data from our organisation to our transcription team;
- the method for ensuring a retention schedule is adhered to; and
- the means used to delete or dispose of the data.

##### **Who we share the personal information with**

We may have to share personal information with the parties set out below for the purposes set out above:

- External third parties – service providers based in the UK who provide IT and system administration services
- Freelance professional transcriptionists recruited, authenticated and trained acting as processors for the provision of transcription services to our clients. On these occasions, 1st Class Secretarial Services act as Joint Controllers and the same data protection obligations as set out in the contract shall be imposed on that processor.
- Should the other processor fail to fulfil its data protection obligations, 1st Class remain fully liable to the Controller for the performance of that other processor's obligations.

- The freelance professional transcription team are subject to a stringent recruitment process, provide guarantees of confidentiality, adhere to the 1st Class quality control procedure and follow the client data management process outlined by 1st Class. All transcriptionists have appropriate technical measures to support personal data security in place.

We require all transcriptionists and third-party suppliers to respect the security of your personal information and to treat it in accordance with the law. We do not allow our transcription team or third-party suppliers to use our clients' personal information for their own purposes and only permit them to process client personal information for specified purposes and in accordance with our instructions.

1st Class Secretarial Services does not transfer your information outside the European Economic Area (EEA)

**How long your personal information will be kept**

We will only retain your personal information for as long as necessary to fulfil the purposes we are processing it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Any information provided to us for processing is managed in line with our Client Data Management Policy and Procedure. (Copy available upon request).

**Lawful Basis for processing personal information**

The table below describes the types of personal information we will process on behalf of our clients and the legal basis we rely on to do so.

Type of Information	Lawful Basis
<ul style="list-style-type: none"> <li>• Personally Identifiable Information</li> </ul>	Contract, Legitimate interest
<ul style="list-style-type: none"> <li>• Special Category Information</li> </ul>	Contract, Legitimate interest.

**Note:** we may process personal information for more than one lawful ground depending on the specific purpose for which we are using your information.

**THE RIGHTS OF AN INDIVIDUAL**

As 1st Class Secretarial Services process data on the documented instruction of a Data Controller, the responsibility for the rights of the individual under GDPR remains with the Data Controller. 1st Class will assist any requests by the Data Controller to support a Subject Access Request they have received or any further request by individuals to exercise their rights under GDPR.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office ('ICO') on individuals' rights under GDPR.

**KEEPING PERSONAL INFORMATION SECURE**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

**HOW TO CONTACT US AND COMPLAINTS**

1st Class Secretarial Services is a “Processor” or “Joint Controller” and is responsible for processing data on behalf of our clients, who are the Data Controller. Our Information Compliance Officer can be contacted directly here:

- Dawn Lawson, Company Secretary
- Email: dawn.lawson@1stclass.uk.com
- Telephone: 0131 510 5105

We hope that we can resolve any query or concern you raise about our use of your information so please contact us in the first instance.

In the event that you wish to make a complaint about how your personal information is being processed by the Company, or how any query or concern has been handled, you have the right to lodge a complaint directly with the Information Commissioner’s Office (‘ICO’), the supervisory authority in the United Kingdom (available at [www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO.