



GDPR STATEMENT

Introduction

On 25 May 2018, the General Data Protection Regulation (GDPR) becomes effective. The GDPR aims to protect the right to privacy of every EU resident giving them a greater say over how their personal data is used. It also details how EU personal data laws are applied outside the EU. The GDPR, therefore, has important implications for how organisations handle confidential data.

McGowan Transcriptions has never used your data in the past. Now, we need to let you know that McGowan Transcriptions is classified under GDPR as a data controller and we are taking every step to ensure that we are compliant with the new legislation. As we have always complied rigorously with the Data Protection Act, we won't need to make many changes.

McGowan Transcriptions' Commitment

McGowan Transcriptions is registered with the ICO and we honour our clients' right to data privacy and protection in accordance with the guidance provided by the ICO. McGowan Transcriptions does not use its clients' personal information beyond what is required for the functioning of its services.

McGowan Transcriptions has demonstrated its commitment to data privacy and protection by:

- Operating a secure connection to communicate between our website and browsers (https);
- Our transcribers have signed a full and comprehensive confidentiality agreement and have had their ID, nationality, and immigration verified and are security checked;
- Each member of the transcription services team adheres to this level of security:
 - 256bit AES encryption
 - FIPS 140-2
 - US DoD (7 pass) standard
- We use Global Lounge for all uploading and their daily security comprises:
 - Third-party McAfee Secure scans
 - AES 256-bit encryption with SSAE 16 certification.
- We are members of the MRS (Market Research Society) and abide by their code of conduct. You cannot become an affiliate member without being sponsored by a Market Research agency, who are existing members of the MRS, who are prepared to vouch for your reputation in the industry.

How is McGowan Transcriptions preparing for GDPR?

As a data controller, we understand our obligation to our clients and their personal data. We have thoroughly analysed the GDPR requirements and are working through several initiatives to ensure that we are only holding the minimum information required to provide the contracted services to our clients, that we allow clients to manage the data that is held and easily be able to provide access to the data and removal wherever possible.



These include:

Identifying personal data

We are undertaking a systematic review of the personal data that is being stored, managed, retained, collected, processed and disposed of across our various systems. Assessment of this data will review information flow, any data transfers, risk, and structural position in relation to lawfulness, purpose, minimisation, accuracy, consent, limitation, integrity and confidentiality, record keeping and accountability.

Providing visibility and transparency

The most important aspect of GDPR is how the collected data is used. As a data controller, we are committed to allowing clients to manage their personal data. Some of these details do filter through to McGowan Transcriptions' backend systems which are not publicly visible for certain applications such as billing or support, but all this data can be retrieved or removed on request where appropriate.

Enhancing data integrity and security

McGowan Transcriptions has always taken the privacy and security of its clients' data seriously. Following the GDPR data assessment, McGowan Transcriptions has also upgraded its Global Lounge platform to automate data removal after a period of inactivity.

Portability and transferability of data

GDPR gives end users the right either to receive all the data provided and processed by the controller or transfer it to another controller depending on technical feasibility. With this new right in mind, we have been implementing new internal procedures and policies to improve the efficiency of the data exporting process.

Training and Awareness

McGowan Transcriptions is in the process of undertaking internal training for all members of the team on GDPR and its impact on the updated policies, procedures, and responsibilities.



Supplier & Partner relationships

McGowan Transcriptions is currently using all reasonable endeavours to ensure that their Global Lounge providers and server hosts are complying with the GDPR.

What does this mean for McGowan Transcriptions clients?

There will be no difference to the service that McGowan Transcriptions clients receive. We are simply making sure that we are fully compliant with the GDPR by May 2018 through improved access controls, procedures and policies for data subjects rights, regular data audits, restricting retained data and enhanced security of client data. McGowan Transcriptions' Operations Team will continue to monitor the GDPR programme up to the target date in May 2018 and beyond.

FAQ

Can we search our personal data on your systems?

Your personal data that you have provided to McGowan Transcriptions can be found in your online control panel in Global Lounge. If you have not logged in for a while, please contact us for a new login.

Can we delete our personal data from your systems?

By updating or closing your account, your personal data will be removed from McGowan Transcriptions' systems. Any data that has filtered through to the backend systems can also be requested to be deleted where applicable. Data can only be removed once payment has been received and after the first day of the month preceding your project completion.

Can we export our personal data from your systems?

On request, McGowan Transcriptions will be able to provide a full export of an individual's personal data. Transcripts/recordings will only be available for 95 days after upload.

Do your standard contract terms include the new GDPR mandatory provisions?

The contract terms have been updated to include the new GDPR mandatory provisions to be in place before May 25th, 2018.



Can you confirm our right to have perennial data deleted or returned upon termination of contract at no extra cost?

Any personal data that is not legally required to be kept for longer periods will not be retained for more than 12 months and upon request can be deleted on termination of contract. Data can only be removed once payment has been received and after the first day of the month preceding your project completion.

What is your geographical location?

Bagshot, Surrey, UK.

What is the geographical location of your data systems?

Pipe Ten – UK

Joe McGowan
Managing Director

4th May 2018