



## PRIVACY POLICY

February 2020

### 1. PURPOSE, SCOPE AND USERS

ScribeFire Pty Ltd recognises and understands the critical importance of privacy and confidentiality when conducting business with its clients, stakeholders and the community. In order to carry out its business activities, ScribeFire must receive, handle and store personal information, and ScribeFire is responsible for ensuring that personal information is protected in accordance with data protection laws.

The purpose of this Privacy Policy is to explain how and why ScribeFire Pty Ltd ('ScribeFire') will receive, collect, handle, use and store the personal information of people who conduct business or otherwise engage with us ('you'). You should read this policy carefully so you are aware of how we may use your personal information.

Users of this document are any naturally identifiable person whose personal information may be received, collected, handled, used and/or stored by ScribeFire.

### 2. TYPES AND SOURCES OF PERSONAL INFORMATION

ScribeFire collects or receives your personal information from a number of sources, as set out in the table below.

Category	Type of personal information	Source
<b>Contact information</b>	<ul style="list-style-type: none"><li>Name</li><li>Address</li><li>Telephone number</li><li>Email address</li><li>Organisation details</li></ul>	<ul style="list-style-type: none"><li>You</li><li>Third parties when personal information is transmitted during the course of providing transcription services to ScribeFire's clients.</li></ul>
<b>Security clearance information</b>	<ul style="list-style-type: none"><li>Contact information (refer to above)</li><li>Sensitive information (see below)</li></ul>	<ul style="list-style-type: none"><li>You</li><li>Third party systems used for obtaining security clearances.</li></ul>

<b>Supplier Information</b>	<ul style="list-style-type: none"> <li>• Contact Information (refer to above)</li> <li>• Purchase order information</li> <li>• Payment details</li> <li>• Banking details</li> <li>• Delivery details</li> <li>• Credit information</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Third party systems used for obtaining credit information</li> </ul>
<b>Website information</b>	<ul style="list-style-type: none"> <li>• Contact Information (refer to above)</li> <li>• IP address and other online identifiers/web beacons.</li> <li>• Details of the pages of our website that you have browsed.</li> <li>• Log on information</li> <li>• Account settings.</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Our website</li> </ul>
<b>Sensitive information</b>	<ul style="list-style-type: none"> <li>• Information relating to actual or suspected criminal convictions and offences.</li> <li>• Other sensitive information about you, for example race, ethnic origin, religious beliefs, organisational memberships, physical or mental health conditions and other sensitive details of your person.</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Third parties when personal information is transmitted during the course of providing transcription services to Scribfire's clients.</li> </ul>

### 3. How we use your personal information

Scribfire is required to use your personal information on a lawful basis only. Scribfire will only use your personal information in a lawful way in order to perform a contract with you, to comply with our legal obligations and for the legitimate use when required in conducting business with our customers and stakeholders.

### 4. Sensitive Information

Scribfire may need to access sensitive personal information in order to conduct its business with its clients. The law requires that Scribfire process sensitive information with more care and in accordance with the applicable laws, and to only do so on a lawful basis. The lawful purpose Scribfire accesses your personal information is in performing security checks on its staff and contractors, and also providing transcription services to its clients. Scribfire may only access

sensitive information for these purposes if you have given your explicit consent and if it is necessary for the establishment, exercise of or defence of legal claims.

## **5. Sharing personal information**

Scribfire does not disclose personal information for marketing purposes.

Sometimes we need to disclose your personal information to other people. In conducting its business, Scribfire sends information to third parties and/or subcontractors. Before disclosing your personal information to third parties, we will seek to ensure they have appropriate technical and organisational measures in place to protect your personal data.

## **6. Data security**

Scribfire will has implemented an information security management system which aligns with the ISO27001:2013 standard. The purpose of the ISMS is to preserve and protect the confidentiality, integrity and availability of information security (including personal information) within the organisation.

Scribfire will comply with applicable data protection laws to ensure we take the appropriate measures to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage.

## **7. Data retention**

Scribfire will only retain your personal information for as long we need to for the purposes for which we are processing it for.

## **8. Your rights**

You have the right to request access to personal information we hold about you. We are able to deny access to some or all of your personal information in specified circumstances. We will provide reasons for any refusal in writing.

If you would like to request access to the personal information we hold about you please contact us on [privacy@scribfire.com.au](mailto:privacy@scribfire.com.au). These requests may incur a fee and you will be advised of an estimated fee and the payment options at the time of written acknowledgement. This is usually provided to you within 5 business days. Our response to your request will usually be completed within 30 days of receipt of the request. If we require further time, we will contact you in writing to advise of this and provide our reasons for the further time that is required.

## **9. Complaints handling**

If you have a complaint about how we collect, hold, use or disclose your personal information or a privacy related issue, please use our complaints process so that we can help. It is important to follow the complaint handling process in order to resolve your complaint effectively and efficiently.

Step 1. Let us know If you would like to make a complaint by contacting us in writing on [privacy@scribfire.com.au](mailto:privacy@scribfire.com.au). A response is usually provided to you within 5 business days.

Step 2. Seek review by an external service If an issue has not been resolved to your satisfaction, you can lodge a complaint with the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner (OAIC)

Complaints must be made in writing

1300 363 992

GPO Box 5218 Sydney NSW 2001

enquiries@oaic.gov.au [www.oaic.gov.au](http://www.oaic.gov.au)

## **10.Changes**

Our Privacy Policy is regularly reviewed and updated. Please visit our website [www.scribfire.com.au](http://www.scribfire.com.au) for the most up-to-date copy.

END POLICY.