Privacy Policy

SCL-Mediation understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our clients and will only collect and use personal data in ways that are described here, and which are consistent with our obligations and your rights under the law.

**What does this Privacy Policy cover?**
This Privacy Policy explains how we use your personal data: how it is collected, how it is held and how it is processed. It also explains your rights under the law relating to your personal data.

**What is personal data?**
Personal data is defined by the General Dara Protection Regulation 2016/679 (the “GDPR”) and the Data Protection Act 2018 (collectively the “Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

**What are our data protection responsibilities?**
SCL-Mediation uses and is responsible for the personal information about you and is therefore the ‘data controller’ of your personal data for the purposes of the Data Protection Legislation.

**What are your rights?**
Under the Data Protection Legislation, you have the following rights which we will work to uphold:

* The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the contact details below.
* The right to access the personal data we hold about you.
* The right to have your personal data rectified if any of your personal data held by us in s inaccurate or incomplete.
* The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold.
* The right to restrict the processing of your personal data.
* The right to object to us using your personal data for a particular purpose or purposes.
* The right to withdraw consent. This means that if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
* The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
* Rights regarding automated decision-making and profiling. We do not use your data in this way.

You can read more about these rights here – <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

Further information about your rights can also be obtained by contacting the Information Commissioner’s Office or your local Citizen’s Advice Bureau.

**What personal information do we collect about you?**
We may collect personal information from you in the course of our business, including through the provision of mediation services, through your use of our website, when you contact or request information from us, or as a result of your relationship with one or more of our mediators or staff.

The personal information that we process includes:

* Basic information, such as your name (including prefix and title), the company you work for, your position or title and your relationship to a person.
* Contact information, such as your postal address, email address and phone number(s).
* Information relating to your location, preferences or interests.
* In certain circumstances, your and others’ signature, financial information and payment-related information
* In certain circumstances, data relating to health (including disabilities), ethnicity, race, religious beliefs, trade union membership and other ‘special category personal data’.
* Technical information, such as information relating to your visits to our website or in relation to emails that we send you.
* The content of any enquiry submitted by you or on your behalf over our website.
* Identification and background information provided by you or collected by us in the course of providing mediation services.
* Any other information relating to you which you may provide to us

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed for so long as we hold your personal data.

**How we obtain your personal information**

* We obtain information from you in the course of providing our mediation services to you.
* We collect your personal information when you use our website and in the course of email communications with you.
* We gather information about you when you provide it to us, or interact with us directly, such as registering on our website.
* We may use publicly available sources to obtain your personal information in order to ensure that the contact details we hold for you are up to date

**How we use your personal information**
We use the personal information that we collect about you from the sources listed above, in a number of ways:

* To provide and improve our services to you, including maintaining our records relating to mediation.  This includes providing personal information to the mediator that you instruct for your mediation
* To respond to any query that you may submit to us.
* To manage and administer our relationship with you (and/ or your business) including by maintaining our database of contents and other third parties for administration, accounting and relationship management purposes
* To complete our contractual obligations to you, or otherwise to take steps as described in our Mediation Agreement (including any associated administration)
* For our legitimate business purposes such as carrying out any relevant conflict checks and managing the operation of our practice
* To keep accounting records
* To promote and market our services
* To provide work shadowing opportunities
* To comply with our professional, legal and regulatory obligations
* To respond to potential complaints or make complaints
* To establish and exercise our legal rights or for the purpose of bringing or defending legal proceedings
* Where we consider it necessary, to prevent or respond to actual or potential fraud or illegal activities.

**Use of our website**
When someone visits www.scl-mediation.co.uk we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. Google Analytics does this by placing small text files called ‘cookies’ on your device.  The information that cookies collect is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will make this clear. We will make it clear when we collect personal information and will explain what we intend to do with it.

 Search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected by either SCL-Mediation or any third party.

**Legal basis on which we use or store your personal information**
The Data Protection Legislation requires that all those that process personal data have a legal basis for doing so. The lawful bases identified in the Data Protection Legislation, and which provide our legal bases for processing your personal data are:

* To perform a contract or to take steps to enter into a contract, such as a contract to provide mediation services to you
* For legitimate business purposes as detailed in ‘How we use your personal information’ above.
* To comply with legal and regulatory obligations
* Where we are otherwise required or authorised to do so by law
* Where processing ‘special category’ data is necessary in the context of the establishment, exercise or defence of legal claims
* In certain circumstances, where we need to process ‘special category’ data in the context of our legal work but outside the scope of the above category, where we have obtained your express consent to do so. As I will explain at the time I collect your consent, you may withdraw it at any time in accordance with the information I provide to you at that time.

**How long we keep your personal information**
We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. The retention period may vary from one piece of information to another. The retention period will also take into account our need to meet any legal or regulatory obligations, good practice and our legitimate business purposes. The need to use or store your personal information will be reassessed on a regular basis and any information which can be destroyed because it is no longer required will be disposed of securely and effectively.

**Who we share your personal data with**
We may share your information with certain trusted third parties in accordance with contractual arrangements in place with them including:

* Our mediators in relation to whom you make enquiries or who you instruct to mediate for you
* Suppliers who provide support services in relation to IT
* Third parties involved in hosting our website

We may share information with business administration service providers, insurers and in connection with bank transfers and accountancy requirements.

We may also be required to provide your information to the Information Commissioner’s Office, to regulators or to the police or intelligence services where required or permitted by law.

We do not sell, rent or otherwise make personal information or contacts commercially available to any third party.

**How we protect your personal information**
We are committed to ensuring that your information is secure. We use a variety of physical, technical and organisational measures to help protect your personal information from unauthorised access, use, disclosure, alteration or destruction. Unfortunately the transmission of information via the internet is not completely secure and although we do our best to protect your data, we cannot absolutely guarantee its security.

We will monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

**Complaints or queries**

SCL-Mediation tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

If you are not satisfied with the way we have handled your privacy concerns or want to make a formal complaint about the way we have processed your personal information, you can contact the Information Commissioner’s Office which is the statutory body which oversees data protection law – [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

**Access to personal information**

SCL-Mediation tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a ‘subject access request’ under the Data Protection Act 1998. If we do hold information about you we will:

* give you a description of it;
* tell you why we are holding it;
* tell you who it could be disclosed to; and
* let you have a copy of the information.

To make a subject access request to SCL-Mediation, you need to put the request in writing to the address provided below. We will respond to your subject access request within 30 days. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, particularly if your request is complex, more time may be required up to a maximum of three months from the date we receive your subject access request. You will be kept fully informed of our progress. If we do hold information about you, you can ask us to correct any mistakes by contacting us again.

**Links to other websites**

This Privacy Policy does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

**How do we use Cookies?**

Cookies are small text files containing information that is stored on an internet user’s device when visiting a website. The information a cookie contains and its purpose is determined by the website operator and can be used by that web server every time you visit that site. Cookies are used to save time and make visiting websites more efficient. If you would like more information regarding what cookies are and what they do, more information is available at <http://allaboutcookies.org>.

Our website may place and access certain first-party cookies on your computer or device. First-party cookies are those placed directly by us and are used only by us. We use cookies to facilitate and improve your experience of our website and to provide and improve our services. We have carefully chosen these cookies and have taken steps to ensure your privacy and personal data is protected and respected at all times.

All cookies used by and on our website are used in accordance with the Privacy and Electronics Communications (EC Directive) Regulations 2003 (“Cookie Law”).

Before cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those cookies. By giving your consent to the placing of cookies, you are enabling us to provide the best possible experience and service to you. You may, if you wish, refuse consent to the placing of cookies; however certain features of our website may not function fully or as intended.

Certain features of our website may depend on cookies to function. Cookie Law deems these cookies to be “strictly necessary”. Your consent will not be sought to place these cookies. You may still block these cookies by changing your internet browser settings, but please be aware that our website may not work properly if you do.

In addition to the controls that we provide, you can choose to enable or disable cookies in your internet browser. By default, most internet browsers accept cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete cookies on your computer or device at any time, however you may lose information that enables you to access our website more quickly and efficiently including any login or personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

**Changes to this Privacy Policy**
We keep our Privacy Policy under regular review. We may change it from time to time if, for example, the law changes or if we change our business in a way that affects personal data protection. This Privacy Policy was last updated on 14 March 2019.

If you want to request information about anything to do with your personal data and data protection, including to make a subject access request, you can email us or write to:

SCL-Mediation

Sentier Consulting Ltd

49 Station Road,

Polegate

East Sussex

BN26 6EA

Or email john.webb@scl-mediation.co.uk