



# **Privacy Notice**

## Your personal data

This Privacy Notice explains the type of information (also called data) we collect, why we collect it, how we use it, who we might share it with and how to correct or modify it.

We are unable to provide our services and run our business without processing your personal data. By formally appointing one of our mediators or interacting with our business, you agree to the processing of your personal information for the purposes described below.

# Why do we collect your personal information?

We collect and process your personal information to provide our mediation services and for our own general business purposes. We collect and use your personal information where we have a lawful basis for doing so. In general, it will be for the following purposes:

- 1. The provision of mediation services and associated administration including conflict checking, invoicing and collecting debts.
- 2. The legitimate business purposes associated with operating our business.
- 3. To comply with our legal, taxation and regulatory obligations.

# What types of data do we collect and process?

Your personal information will usually be provided by you or via your solicitors if they are instructing us on your behalf. However, there may be instances where it comes from other sources or third parties (including publicly available information) or other professional advisers or suppliers.

The types of data we process may be varied but will usually include full names and contact details. Depending on the nature of our relationship with you, it may also include your date of birth; employment details; detailed information about your dispute and other associated information; your business and company affiliations; financial affairs; family, lifestyle and social circumstances; and the goods or services you or your company provide us.

In some circumstances we may process special categories of personal data about you, in which case we take particular care to only process such data in accordance with the strict legal parameters. This type of data can include information about your health (including information you provide about your dietary requirements when attending mediations); racial or ethnic origin; religious or political beliefs; or sexual orientation.

Your personal data will be held in electronic format and will be stored on secure third-party cloud platforms including iCloud and Microsoft 365.

You may also provide us with personal data about other people. Please ensure you provide them with a copy of this notice, where appropriate to do so.





#### Who do we share your data with?

In providing our services and in complying with our legal obligations, we may be required to share the personal information that we obtain about you, insofar as we are permitted by law to do so, with the following third parties:

- Third parties advising you including law firms, counsel and other professionals involved in your dispute including those representing your counterparties.
- Our accountants, legal and other professional advisors, our banks, insurers and insurance brokers.
- Our professional IT supplier and the providers of iCloud and Microsoft 365.
- Government agencies including Her Majesty's Revenue & Customs, regulators and other authorities.

We may also seek your consent to share your full name and contact details as requested on any feedback forms you complete for our certification bodies including the International Mediation Institute (IMI) and the Singapore International Mediation Institute (SIMI).

We will not sell your personal data to a third party other than in the event of a sale of our business if your personal data forms part of the sale.

## How long do we keep your personal data?

We will retain your personal information for as long as it is reasonable and necessary for the use for which we have collected it.

## What are your rights?

You have rights under data protection laws to request access to, rectification of, erasure of, restriction of, or objection to our processing of, your personal data. You also have the right to data portability. Please contact <u>info@squaringcircles.uk</u> if you have any questions about your data or to exercise your rights. You can find more information about your rights at <u>www.ICO.org.uk</u>.

You have the right to lodge a complaint with the Information Commissioner in respect of our processing of your personal data. Information can be found at <u>www.ICO.org.uk</u>. If you would like to raise your complaint with us, please request a copy of our Complaints Procedure by contacting <u>info@squaringcircles.uk</u>.

## Updating this policy

We may amend this policy at any time by posting a revised version on our website. Please check our <u>website</u> for the latest version of this notice.

August 2024