

## Jolly Mediation – Privacy Policy Statement

Jolly Mediation is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified then you can be assured that it will only be used in accordance with this privacy policy.

### Our Privacy Policy explains:

1. What information we collect and how we collect it
2. Why and how we use your information
3. How long we keep your information
4. How we may share your information
5. Your rights on the information we hold about you
6. Security - how we keep your information safe
7. Changes to this privacy policy
8. How to contact us

The Data Controller is Jolly Partnership Ltd (Jolly Mediation is part of Jolly Partnership Ltd). We are registered with the ICO under the Data Protection Register, our registration number is: **ZA739702**

### 1. What information we collect and how we collect it

In order to provide our services and for the other purposes set out in Use of Information below, we collect and process Personal Data from our service users. Jolly Mediation provides a range of services, so we have given examples of the types of information we require based on the service we are providing.

**Mediation** - we may collect any or all of the following information, but the data we collect will be related to the service we are providing to you:

- Personal information (for example, your name, email address, mailing address, phone numbers, date of birth)
- Sensitive Personal Data (for example your financial situation, your accommodation arrangements, details of child contact arrangements, court orders that affect you, the involvement of other agencies for example police or social services)
- Attendance information (such as dates you used our service)
- Safeguarding (such as details of concerns about the safety of a child or vulnerable adult).

### 2. Why and how we use your information

We collect your information from

- Telephone conversations and emails
- Written and verbal material (collected during meetings, documents submitted to us, etc)
- Referrals from organisations e.g. referring solicitors
- Other communications and from records of any sessions.

From time to time and as permitted by applicable law(s), we may collect Personal Data about you and update any existing Personal Data that we currently hold from other third-party sources.

### Parents and children

If the person about whom we are holding information is below 16 then we will need to seek consent from the parent or legal guardian if consent is required. Once the person reaches 16, we will seek consent from them.

### Your Personal Data may be used in the following ways:

- To provide our services to you,
- To respond to your requests and enquiries,
- To improve our services, for example creating statistics
- To request your participation in surveys, academic research or other initiatives which help us to gather information used to develop and enhance our services and inform professional development.
- To comply with applicable law(s) or to ensure the quality and professional practice of our Associates.

**If you have any queries, please contact Katie Jolly on 07821 011060**

- To enable us to provide, to maintain our own accounts and records and to support and manage our employees and our Associates.

#### **What is the legal basis for processing your personal data?**

- Consent - where we have asked you for written permission to hold and process your data
- Contractual necessity - where we have a contract to provide services to you (for example, an agreement to mediate)
- Compliance with Legal Obligations - where for example, processing is necessary for carrying out obligations under the law
- Vital interests - where processing is necessary to protect your vital interests or those of another person (for example, where we may have an obligation to report concerns for the safety of a child or vulnerable person)
- Our legitimate interests, which include processing such Personal Data for the purposes of
  - Providing and enhancing the provision of our services.
  - Administration and programme delivery
  - Where processing relates to personal data manifestly made public by the data subject
  - Reporting safeguarding concerns
- Data relating to criminal offences and civil law enforcement.

### **3. How long we keep your information**

We will keep your information no longer than we are required to for administration, by our professional body or our insurers (whichever is the longer). We are currently required to hold data on you and details of the services we supplied to you for seven years.

For mediation clients, all supporting documentation provided by you as part of your negotiations (e.g. bank statements, pension values etc.) will be destroyed or returned to you at the end of the mediation process.

### **4. How we may share your information**

We may disclose your Personal Data to third parties from time-to-time under the following circumstances:

- You request or authorise the disclosure of your personal details to a third party.
- The information is disclosed as permitted by applicable law(s) and/or in order to comply with applicable law(s) (for example, to comply with a search warrant or court order).
- The information is provided to service providers who perform functions on our behalf, for example:
  - Hosting providers for the secure storage and transmission of your data
  - Legal and compliance consultants, such as external counsel, external auditors
  - Technology providers who assist in the development and management of our web properties.

### **5. Your rights on the information we hold about you**

As a user, you have the following rights with respect to your personal data:

- The right to be informed of the use of your Personal Data
- The right to access and/or to require the correction or erasure of your Personal Data
- The right to block and/or object to the processing of your Personal Data
- The right to not be subject to any decision based solely on automated processing of your Personal Data

If you have a complaint in relation to the processing of your data carried out under this Privacy Policy, you have the right to lodge a complaint with the Information Commissioner Office.

You may seek to exercise any of these rights by updating your information online (where possible) or by sending a written request to the Administrator, at the address below.

### **6. Security - how we keep your information safe**

We always work to protect your personal information that we hold, its confidentiality, integrity and availability.

- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorised access to systems.
- We restrict access to personal information to staff and associates, subject to strict contractual confidentiality obligations and who may be disciplined or have their contract terminated if they fail to meet these obligations.

**If you have any queries, please contact Katie Jolly on 07821 011060**

- We only use third party service providers where we are satisfied that they provide adequate security for your personal data.

**Compliance and cooperation with regulatory authorities**

We regularly review our compliance with our Privacy Policy. If we receive formal written complaints, we will contact the person who made the complaint to follow up. We will work with the ICO to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

**7. Changes to this Privacy Policy**

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent.

**8. How to contact us**

If you wish to contact us in relation to any aspect of this document please write to:

The Data Protection Officer, Jolly Partnership Limited, 143c Bengo Street, Hertford, SG14 3EY