



## **PRIVACY POLICY**

### **1. Purpose of this Policy**

Wells Family Mediation (WFM) have developed this privacy policy to demonstrate our commitment to safeguarding the privacy of your data whilst providing a personal and valuable service. This privacy policy applies to all personal data as defined in the General Data Protection Regulation 2018.

### **2. Collection of Information**

We collect personal information as volunteered by you through telephone calls to us, emails, referral forms, meetings in the office, and via our Website.

The information we collect will vary depending on the service you request but could include name, address, phone number, email address, gender, date of birth, reasons for coming to mediation, financial history, relationship and marriage background, names and ages of children. We may also ask for additional information depending on the nature of the service to be provided.

We will not collect personal information about you without your knowledge or permission unless provided to us by your ex-partner as part of the mediation process.

This information will be kept securely on file for up to 3 years in the event that you return to mediation.

### **3. Use of Information**

We will use your personal information to provide mediation services, produce summary documentation and where necessary provide forms for court.

The personal information we obtain will be disclosed only to the partners or staff at WFM and only as much as is reasonably necessary for the purposes as set out in this privacy policy.

### **4. Sharing Information**

Unless required to do so by law, we will not pass your information to any third party other than a data processor acting on our instructions pursuant to the General Data Protection Act 2018.

WFM will not share personal data with third parties for marketing purposes.

Where specifically you request us to send your information to solicitors, legal draftsman, financial advisor or other professional we will do so.

## 5. Data Transfers

Accelerator is a managed services provider who provides WFM with a Hosted Exchange, supplied from a company called Rackspace.

WFM use Hosted Exchange accounts for transmitting confidential and sensitive data via email. We have ensured that our supplier is GDPR compliant. Most of our Hosted Exchange data is stored within the EU, however some is processed within the US and is certified under the Privacy Shield Framework Agreement, which means under EU law the supplier is eligible to hold EU citizen data under the GDPR.

## 6. Your Rights

As the Data Subject, you have certain rights to the personal information we process about you. You have the:

- a. Right to be informed
- b. Right of access
- c. Right to rectification
- d. Right to erasure
- e. Right to restrict processing
- f. Right to data portability
- g. Right to object to having your personal data processed

If you would like to remove, check or amend any of the information held about you, or exercise any of your data subject rights, please send an email to [info@wellsfamilymediation.co.uk](mailto:info@wellsfamilymediation.co.uk) and we will take the necessary action within a reasonable time.

Requests must be made in writing and there is a £10 fee for each request. Proof of identification is required in order to protect your information.

The rights detailed above do not relate to any session records of the mediator, which are a memory aid and belong to the mediator. Our session records will not be shared with others, and are subject to this privacy policy.

## 7. Lawful Basis for Processing

WFM have legitimate grounds for collecting and using your personal data, namely we need to have such information for the purposes of a) inviting people to mediations and b) conducting the mediations that individual clients ask us to provide.

The "General Data Protection Regulation" (GDPR) is the primary piece of legislation defining your rights over our processing of your personal information. The GDPR requires us to declare which of six "lawful reasons" we are relying on when we are processing your personal data:

- Before the Agreement to Mediate is signed, we operate on the basis of "legitimate interest". In order to facilitate the mediation process, we will process your data in a targeted and proportionate way. Once the Agreement to Mediate is signed, we operate on the basis of "contract".

## **8. Security**

To prevent unauthorised access, maintain data accuracy and ensure the correct use of information, we have put in place appropriate physical and electronic procedures to safeguard and secure the information we collect from you.

## **9. Changes to our Privacy Policy**

We reserve the right to change our Privacy Policy and all changes will be posted on the WFM website where they will take immediate effect. Where the changes are significant, we may also choose to email all our current clients with the new Privacy Policy.

## **10. Contact Us**

If you have any questions or comments about this Privacy Policy or if you would like to exercise your rights please contact us at [info@wellsfamilymediation.co.uk](mailto:info@wellsfamilymediation.co.uk) or write to Wells Family Mediation, Pantiles Chambers, 85 High Street, Tunbridge Wells Kent TN1 1XP.