

GDPR – How Smile Mediation uses Your Data

Smile Mediation is committed to respecting the privacy of all visitors to its website (the 'website') and of its clients and contacts. Please read the following privacy policy to understand how we use and protect the information that you provide to us or that we obtain or hold about you and to understand what your rights are in relation to information that we hold. This policy applies to information about living identifiable individuals only.

Smile Mediation's Privacy Notice is available to download. Information on Subject Access Request can be found [here](#).

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What information does Smile Mediation process?

From our general website

You may choose to provide personal information to us when you access the website e.g. to ask us to contact you or to book a training event. You may be asked to provide certain information about yourself including your name, title, postal address, telephone number and/or email address.

Automatically

We may also collect information automatically about your usage of our websites using cookies and other technology (for full details of what we use see the section below on "Cookies"). To that effect, we use your IP address (a series of numbers that identifies a computer on the internet) to collect, among other things, internet traffic data and data regarding your browser type and computer. If you do not want to receive cookies, you may reject them by using your browser settings provided they are not necessary for delivery of our website or services to visitors.

For mediation work

From you

If you seek to access our mediation service you will be asked to complete a self-referral form which requires that you provide information about your circumstances as well as contact information for you and the other parties to the matter. You may also provide us with additional information that you consider relevant as part of your instructions to us.

From third parties

We also receive information about you via referrals from third parties such as your Housing Provider or Local Council/Authority. Alternatively, you may provide us with information about you directly at our request or otherwise.

How does Smile Mediation use this information?

We will use your information for the specific purpose(s) for which it has been provided to or collected by us e.g.:

- to provide information that you may request regarding the services that we offer e.g. whether we can assist with certain mediation services
- to contact you to introduce you to our mediators
- to comply with our statutory and regulatory obligations
- to book you onto a course or event
- to administer your application for a vacancy within the firm
- to deal with your feedback, query or complaint
- to contact you for your views on our services

We also use your information to administer, support, improve and develop the practice generally and to enforce our legal rights and obligations.

Occasionally we may also use the information that we collect about you for marketing and hospitality purposes to invite you to a conference or an event that may assist you in your understanding of current mediation and skills awareness.

Information gathered through cookies and similar technologies are used to measure and analyse information on visits to our websites, to tailor the websites to make them better for visitors and to improve technical performance. We will not use the data to identify you personally or to make any decisions about you.

Processing grounds

We must have a lawful basis for processing your information; this will vary on the circumstances of how and why we have your information, but typical examples include:

- the activities are within our legitimate interests as a mediation service seeking to engage with and provide services to prospective and current clients and personnel e.g. to make our systems and procedures more efficient
- you have given consent for us to process your information e.g. in relation to certain marketing activities
- we are carrying out necessary steps in relation to a contract to which you are party or prior to you entering into a contract e.g. because you wish to instruct us to carry out mediation services for you
- to protect your vital interests e.g. if you were unfortunate enough to fall ill or suffer an injury on our premises

If we process any special categories of information i.e. information revealing racial or ethnic origin, genetic data, processing of biometric data for the purpose of uniquely identifying individuals, health data, or data concerning your sexual orientation, we must have a further lawful basis for the processing. This may include:

- where you have given us your explicit consent to do so e.g. to cater for your medical needs whilst on the premises
- where the processing is necessary to protect your vital interests or someone else's vital interests
- you have made the information public
- the processing being necessary for reasons of substantial public interest e.g. to undertake activities in relation to the prevention or detection of fraud or other unlawful or dishonest activities

Marketing

If you become a client of Smile Mediation, we may use your personal information to invite you to hospitality events or other selected events for clients and/or to send you information that we think may be of interest to you. This is within our legitimate interests as a mediation service to use your information in this way.

We may also use personal information about our professional contacts to invite them to hospitality events or other selected events and/or to send them information that we think may be of interest to them or their business. This is also within our legitimate interests.

You are entitled to require us to remove your details from any marketing lists. If you do not wish to receive any direct marketing material or communications after you submit or provide your details, please contact us using the

details below (stating UNSUBSCRIBE in the heading of any email message or postal communication) indicating if you do not wish to be contacted for one or more of these marketing purposes and/or via particular forms of communication e.g. email or telephone. Please note that the preferences that you state will override any registrations you or your organisation may have with the relevant preference organisations (such as the telephone preference services).

If you change your mind about being contacted by us in the future, or change address, or if any information that we hold about you is inaccurate or out-of-date, please let us know by: emailing: info@smile-ltd.co.uk or writing to us at: Smile Mediation Ltd, Centenary Court, Croft Street, Burnley. Lancashire BB11 2ED

Disclosure of your information

Some of the information you provide to Smile Mediation will be held on our computers in the UK and will only be accessed by or given to our staff (or staff of Smile Mediation related entities) working in the UK. Some of the information you provide to Smile Mediation may be transferred to, stored and processed by third party organisations which process data for us and on our behalf. These third parties are based (or store or process information) in the UK or elsewhere within the EEA. As with many firms, these third parties may include third party IT platforms (including cloud based platforms), suppliers of administrative and support services and suppliers of other specialist products.

We may also transfer your information to other organisations or professional advisers with whom we are working on client matters or to whom we are referring you for additional or separate advice. We may also be obliged to disclose data under certain laws or by order of court or other competent regulatory body or may be permitted to disclose it under applicable data protection laws.

Finally, if Smile Mediation merges with another business entity or divests a part of its business or carries out internal corporate restructuring, your information may be disclosed to Smile Mediation's new business partners or owners or the new corporate entities.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy; please see section "Protection of your information" below.

Protection of your information

We have in place administrative, technical and physical measures internally specifically designed to guard against and minimise the risk of loss, misuse or unauthorised processing or disclosure of the personal information that we hold.

Where we transfer information to third parties to enable them to process it on our behalf, we ensure that the providers meet or exceed the relevant legal or regulatory requirements for transferring data to them and keeping it secure. All third parties are subject to confidentiality obligations which form part of our contractual relationship with them.

We will also ensure that where information is transferred to a country or international organisation outside of the UK / EEA, we will comply with the relevant legal rules governing such transfers.

We keep your personal information no longer than is necessary for the purpose for which it was collected. Information on our destruction dates policy summary is available from us and will be dependent on the nature of your case or your relationship with the service. Information for clients is provided in our correspondence including details on how we keep secure personal data received from clients about their family members, third parties or similar individuals.

Your rights

You have certain rights in relation to your personal information, although those rights will not apply in all cases or to all information that we hold about you. For example, we may need to continue to hold and process information to establish, exercise or defend our legal rights.

You have the right to request that we:

- Provide you with a copy of your personal information that we hold

- Update your personal information where it is out-of-date or incorrect
- Delete personal information that we hold
- Restrict the way in which we process your information
- Consider any valid objections to our processing of your personal information
- Provide information you have given to us to a third party provider of services (where our lawful basis for processing is consent or contract and where processing is automated)

We will respond to your request (including providing information on whether the rights apply in the particular circumstances) within the applicable statutory time period. If we are not sure of your identity, we may require you to provide further information in order for us to confirm who you are. A request for information can be made by submitting a Subject Access Request.

Changes to this policy

We may make changes to this policy from time to time as our business and internal practices and/or applicable laws change. We will not make any use of your personal information that is inconsistent with the original purpose(s) for which it was collected or obtained or otherwise than is permitted by applicable law.

How to contact us

If you would like to get in touch to discuss this policy, how we use your personal information, to exercise your rights or to provide feedback or make a complaint about use of your information, please contact us as follows:

Karen Ainsworth – Mediation Services Manager info@smile-ltd.co.uk or 01282 436989

Smile Mediation Ltd, Centenary Court, Croft Street, Burnley. Lancashire. BB11 2ED

You can also contact the Information Commissioner's Office via <https://ico.org.uk/> for information, advice or to make a complaint.

Cookies

Cookies, also known as browsers or tracking cookies, are small text files that are added to your computer when you visit a website. They help websites to perform certain functions e.g. to know who you are if you log into a restricted part of a website, for shopping carts, and for tracking purposes.

At Smile Mediation we use the following cookies:

- **Google analytics.** We use Google analytics cookies on the website for tracking purposes. The cookies allow us to understand general traffic to our website for example number of visitors and length of time on site. This process does collect data, but in an anonymous form, to help us make improvements, develop the website and enhance the user experience.

Please note that you cannot opt-out of the deployment of cookies that are necessary for delivery of our website or services to visitors.