



PRIVACY POLICY

Alchemy is committed to protecting and respecting the privacy of your personal data. Our use of your data is subject to the EU General Data Protection Regulation 2018 (GDPR). This policy explains how and why we collect personal information, how we use it and how we keep it secure.

PERSONAL INFORMATION DEFINITIONS

Personal data: any information that can be used to identify a living individual.

Sensitive personal data: personal information revealing:

- health, sex life or sexual orientation
- racial or ethnic origin
- genetic and biometric data
- religious beliefs, political opinions, philosophical beliefs or trade union membership.

1. Personal information we collect

The information we collect from you will vary depending on the nature of the service to be provided. Some of that information may have been volunteered by you when you make the initial contact with us. We will only collect data necessary to enable us to provide our services to you.

2. How and why we use your personal information

We will use your information to provide our services to you. The GDPR sets out the various lawful reasons we can process your data and it requires us to explain which of these reasons we are relying on when doing so:

Initial contact

In most cases you will have contacted us to enquire about our services. At the stage of initial contact and associated communications, *legitimate interest* is our lawful basis for processing your information. Where mediation is concerned, your contact details may have been provided to us by someone else such as a solicitor or your former partner and we have a legitimate interest in using that information to contact you to establish whether you wish to attend an initial meeting or statutory MIAM (Mediation Information and Assessment Meeting) as outlined in s.10 of the Children and Families Act 2014.

Working together

From the time of your first meeting with us the lawful basis for processing your data is *contract*. If we proceed to any service, be it Mediation or Family Consultancy or Therapy, an appropriate agreement will be signed. In addition, if it is relevant to process sensitive personal information as outlined in section 1, you will be asked to provide your explicit *consent* for us to process this, as required by the GDPR.

3. Who we share your personal information with

We will never share your personal information with any organisation or third party for the purposes of direct or other marketing. We may share your information:

- with the appropriate safeguarding agency if information shared with us gives us concern about harm to you or another person, particularly a child;
- with the appropriate authorities where there is an over-riding obligation in law or regulation that requires us to disclose information, for example, the commission of an unlawful act or criminal offence;
- with third parties such as solicitors, financial advisors etc. where we have your consent to do so;
- with our Professional Practice Consultant or Clinical Supervisor for the purposes of professional and quality assurance standards, on a strictly controlled and confidential basis;
- with the relevant complaints handling organisation in the event of a complaint;



- with another professional such as co-mediator, family consultant, therapist or similar third party involved in your mediation or family consultancy or therapy with your express consent;
- with external service providers such as our bank and accountants.

4. Keeping your information secure

We have appropriate physical and electronic measures in place to safeguard and secure your information from being used or accessed unlawfully in accordance with our obligations under the GDPR.

5. How long your personal information will be kept

We may keep some of your personal information after we have completed working with you – different retention periods apply for different types of data. Any agreement you sign will explain how long we keep your data for or you can ask us at any time for our current retention period that applies to your information.

6. Your rights

The GDPR gives you certain rights in relation to the data we hold about you. Under the GDPR can exercise the following rights:

- the right to information
- the right to access
- the right to rectification
- the right to be forgotten
- the right to restrict processing
- the right to data portability
- the right to object
- the right not to be subject to automated individual decision-making (Alchemy does not use automated profiling or decision-making)

The GDPR also gives you the right to lodge a complaint with the Information Commissioner's Office (ICO). For further information on each of the above rights, including the circumstances in which they apply, (some are restricted in certain circumstances), please see the guidance from the ICO.

7. Changes to this privacy policy

We review this policy regularly and, where necessary, make updates to ensure it accurately reflects how we use your data.

8. How to contact us

We hope this policy helps you understand how we use your data. If you have any questions about this policy or seek to exercise any of your rights you can contact us at info@alchemymediation.co.uk or write to Alchemy, 63A Lower Green Road, Tunbridge Wells, TN4 8SR.