

# **ALS Mediations Privacy Policy**

## Last updated: 04th February 2025

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service, and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy.

## **Interpretation and Definitions**

## Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

## Definitions

For the purposes of this Privacy Policy:

- Affiliate means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or others.
- **Business** (referred to as either "the Business", "We", "Us" or "Our" in this Agreement) refers to ALS Mediations.
- **Cookies** are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website amongst other.
- **Country** refers to: United Kingdom
- **Device** means any device that can access the Service such as a computer, a cellphone, or a digital tablet.

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- **Personal Data** is any information that relates to an identified or identifiable individual.
- **Service** refers to ALS Mediations Website, email, social media accounts, as well as correspondence with us and mediation services/sessions.
- Service Provider means any natural or legal person who processes the data on behalf of the Business. It refers to third-party companies or individuals employed by the Business to facilitate the Service, to provide the Service on behalf of the Business, to perform services related to the Service or to assist the Business in analyzing how the Service is used.
- **Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- Website refers to ALS Mediations website, www.alsmediations.com
- You means the individual accessing or using the Service, or the Business, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

## Collecting and Using Your Personal Data

## **Types of Data Collected**

## 1. General Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- First name and last name
- Email address
- Phone number

## 2. Specific Personal Data

Our Business will ask you to provide us with a discretionary description of your case, in order to assess whether we can mediate for you and if



so, in order to provide you with our Service. This description will usually include:

- Personal information about you and the other party(s)
- The nature of your dispute
- Information relating to ongoing legal proceedings
- And other data related to your case

## 3. Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

## 4. Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service. The technologies We use may include:

• **Cookies or Browser Cookies.** A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies

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or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.

• Web Beacons. Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Business, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

We use both Session and Persistent Cookies for the purposes set out below:

## • Necessary / Essential Cookies

Type: Session Cookies

Administered by: Us

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

## • Cookies Policy / Notice Acceptance Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

# Functionality Cookies

Type: Persistent Cookies Administered by: Us

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Purpose: To provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

For more information about the cookies we use and your choices regarding cookies, please visit our Cookies Policy or the Cookies section of our Privacy Policy.

## **Use of Your Personal Data**

The Business may use Personal Data for the following purposes:

- With your consent: where You have given Us clear consent for Us to process Your personal information for a specific purpose.
- **To provide and maintain our Service**, including monitoring the usage of Our Service.
- For the performance of a contract: where Our use of your personal information is necessary for a contract we have with You, or because You have asked us to take specific steps before entering into a contract;
- Where we have a legal obligation: where Our use of your personal information is necessary for Us to comply with the law (not including contractual obligations);
- For a public task: where Our use of your personal information is necessary for Us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law;
- **To contact You:** To contact You regarding updates or informative communications related to contracted services.
- **To manage Your requests:** To attend and manage Your requests to Us.
- For other purposes: We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our Service and to evaluate and improve our Service and your experience.

We may share Your personal information in the following situations:



- With Data Processors: We may share your personal information with our data processors, software and IT to handle and store your information when required to provide you with Our Service. Where necessary, our data processors may share personal information outside of the UK. When doing so, they comply with the UK GDPR, making sure appropriate safeguards are in place.
- **Service Providers:** We may share Your personal information with Service Providers to monitor and analyze the use of our Service when necessary to provide our Service.
- **With Your consent**: We may disclose Your personal information for any other purpose with Your consent.

## **Retention of Your Personal Data**

The Business will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. Please find below a table with the retention timeframes of your data:

When We ask for Information	Information We ask for	Purpose and timeframe
When You make enquiries with ALS Mediations regarding mediation services via our website, email, phone call or social media	<u>General Personal Data:</u> -Name -Surname -Telephone Number -Email address -Details of parties involved and any representatives -Nature of Your case	Time: 6 years Purpose: For legitimate interests to process and maintain the progress of your case, to maintain a record of our work and to improve Our Services.
When You share with us information during the mediation process	Specific Personal Data -Any information shared during the mediation process and which is not covered in the general personal data section, including:	Time: 5 working days Purpose: For administrative purposes only. All information collected and used during the mediation session(s)



	<ul> <li>Personal details other than those covered in the general section</li> <li>Specific information about any amounts of money disputed.</li> <li>Information about the specificities of the issues in dispute.</li> <li>Confidential business information, including salaries, employees data, terms of contract disputed and others.</li> <li>Information related to legal proceedings</li> <li>Any other information raised during the course of the mediation process.</li> <li>The terms reached between the parties or final agreement.</li> </ul>	will be destroyed and/or deleted as soon as the service between We and You has concluded, and in any event, not later than 5 working days after the end of it.
When you submit a complaint to us	-Name -Surname -Telephone number -Email address -Details of your complaint -Any other information you provide to Us	For as long as it is necessary to handle the complaint and 6 years after the matter is resolved for Our legitimate interests.

The Business will also retain Usage Data for internal analysis purposes to strengthen the security and to improve the functionality of Our Service.



## Transfer of Your Personal Data

Your information, including your Personal Data, is processed digitally by the Business and stored securely in our digital platforms. Some information may also be digitally stored and processed by a third party in our offices based in London to ensure the smooth running of our business' work. We ensure that all your information is kept safe and confidential, and that any Data Collection is destroyed in accordance with the terms of this agreement.

By using the Service and sharing your personal information with us, You agree to the collection, use and transfer of your data in accordance with this Privacy Policy, and when required by our Business.

The Business will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an additional organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

## **Delete Your Personal Data**

You have the right to delete or request that We assist in deleting the Personal Data that We have collected about You.

You may contact Us to request access to, correct, or delete any personal information that You have provided to Us by writing us at our email address: info@alsmediations.com

Please note, however, that We may need to retain certain information when we have a legal obligation or lawful basis to do so.

## **Disclosure of Your Personal Data**

#### Law enforcement

Under certain circumstances, the Business may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).



## Other legal requirements

The Business may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Business
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

## Children's Privacy

Our Service does not address anyone under the age of 18. We do not knowingly collect personally identifiable information from anyone under the age of 18. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 18 without verification of parental consent, We will take steps to remove that information from Our servers.

## Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## **Registration with the ICO**

Sondos Nafie of ALS Mediations is a registered data controller with the ICO.



## **Changes to this Privacy Policy**

We may update Our Privacy Policy from time to time. We will post the new Privacy Policy on our website with the date of update on top of it. If the new Privacy Policy change is likely to affect you, we will inform you via email prior to the change taking place. This will usually be the case if you are currently receiving our Service.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on our website.

## <u>How to complain</u>

If you have any concerns about our use of your personal data, you can make a complaint to us using the following contact details:

- By email: info@alsmediations.com
- By post: ALS Mediations, 4<sup>th</sup> Floor, Silverstream House, 45 Fitzroy Street, Fitzrovia, London, W1T 6EB

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

- Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- Website: https://www.ico.org.uk/make-a-complaint