

## **Privacy Notice**

At **reunite** confidentiality and the security of any information you give to us is a high priority. This policy document is intended to set out why we use your data, how it is stored and processed, our legal basis for using your data and what your rights are relating to your data.

### **Who are we?**

**reunite** International Child Abduction Centre is a charity registered with the Charity Commission – Charity Number 1075729. We are sometimes known as ‘**reunite**’ or ‘**reunite** International’ and are referred to as ‘we’ throughout this notice.

**reunite** includes our Advice Line and Mediation services.

### **Who can you contact about your data?**

If you would like to request to see the data that we hold on you, or have any queries or complaints relating to how we handle your data, please contact us in writing by email to [reunite@dircon.co.uk](mailto:reunite@dircon.co.uk) or by post to reunite International Child Abduction Centre, PO Box 7124, Leicester, LE1 7XX.

### **How do we collect information about you?**

**From you directly** – Information about you may come directly from yourself, either through phone conversations, emails, posts on our social media sites or through the post.

**From Third Parties** – We are sometimes given information by third parties. Examples of this include:

- Friends and Family members – seeking advice or enquiring about mediation on behalf of their friend or relative.
- Third Party Organisations such as Solicitors, Government Departments and other Non-Governmental Organisations - seeking advice relating to a client or wishing to make a referral to one of our services.
- Fundraising Websites – we are notified when you make a donation to **reunite** through an online giving platform, though you do have control about how much of your information is shared with us.

**Information in the public domain** - We will from time to time collect information from public sources such as business websites and online directories.

### **What are Cookies?**

A Cookie is a small file that is saved onto the device you use to access our website, which stores small bits of information about how you use our website.

We use cookies to understand how people use our website and to ensure that the content that is accessed most often is as good as it can be.

We are not able to access your device remotely through cookies, and cookies do not tell us who you are.

We access the information collected by Cookies through Google Analytics which tells us information such as how long you were on the website for and what part of the world you are in. For more information on Google Analytics cookies, see the Google Analytics page at <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>.

You have the right to accept or decline cookies. Many browsers automatically accept cookies, but you can change your browser settings not to accept cookies. This may impact on how well you can access the website.

### **What information do we collect about you?**

We will collect certain information about you to enable us to provide you with our services. Such information includes:

- Your contact information; including your address, telephone number and email address.
- Information about your situation including what has happened and what plans are currently in place for the future.
- Personal information about yourself including nationality and marital status.
- Personal information about your child or children.
- Donation information through online giving platforms.
- Payment information if you wish to make a donation or need to pay for mediation.
- Information through our website using cookies.

If there is any information that you do not wish to give us, or that you would not like us to record, then you do not have to disclose this information to us. This may impact the accuracy of the information and advice that we give you, or how far we are able to progress with your request for mediation.

### **How do we use your information?**

We will only use your data where there is a legal reason for us to do so.

### **Specific Consent**

Sometimes we will ask for your consent for us to use your data in certain ways, for example:

- Opening an Advice Line case for you and remaining in contact with you.
- If you would like us to contact third parties on your behalf about your case and we agree to do so.
- The processing of the personal data of your children, such as their names and dates of birth.
- The use of payment information.
- Using your contact information to let you know about **reunite** events and fundraising opportunities.

When asking for your consent we will explain to you how we will be using that information and why we need it. Where we store your information based on your consent, you have the right to withdraw your consent at any time.

### **Legitimate Interests**

We will use your information for legitimate interests, as long as it does not infringe upon your rights. Most of the information collection and processing we undertake are in our legitimate interests as it underpins our work and the services we provide. Examples include:

- The provision of specific and appropriate information and advice through our advice line.
- The provision of information about our mediation service.
- Anonymised statistical research for reporting and research purposes.
- Storing emails and other correspondence so that we can respond.
- Processing information we receive from online giving platforms.

Although we will be processing data for our legitimate interests we still consider the confidentiality of your personal information to be of great importance. We will not process your data in a way that infringes on you data rights.

### **Fulfilment of a Contract**

We will process your information to fulfil a contract we have with you, or a contract you have with someone else, such as:

- Providing mediation that you have paid for.
- Passing information on to a third party so that you can undertake a fundraising task, such as sharing information with the organisers of the Virgin Money London Marathon.
- Making your file available to the Legal Aid Agency for review if your mediation is funded by Legal Aid.

### **Legal Obligation**

By law we may need to process your information and share it with other parties in particular circumstances. Examples of this include:

- Sharing information with regulatory bodies such as the Charity Commission and the Fundraising Regulator.
- Disclosing welfare concerns to a Local Authority, Police or other appropriate bodies when we feel that a child or vulnerable adult is at risk of harm.

### **Who will we share your information with?**

We will only share any identifiable information about yourself or your children with your express consent, unless there is a court order or other reason by law that means that we have to disclose information. Some of the legal reasons for sharing your information are listed above in the section of 'How do we use your data?' that covers 'Legal Obligation'.

### **How is your information stored and how long is it kept for?**

Information given to us is stored electronically and in hard copy as is necessary and appropriate. As we take the confidentiality of your information very seriously there are appropriate safeguards in place to ensure that your information is only accessed by **reunite** staff who need to see it.

We will store your information for as long as you use our service and for a period of time afterwards. These timeframes are:

- Electronic advice line files – 10 years after case is archived.
- Paper advice line information – 10 years after case is archived.
- Electronic Mediation files – 6 years.
- Paper mediation files – 6 years.
- Other electronic files – 6 years.
- Other paper records – 6 years.

We will only keep information for as long as it is needed and will confidentially destroy information once we have ceased communication and the above time frames have lapsed.

### **Your Rights**

Data protection law provides you with certain rights in relation to your personal data. These rights are:

- The right to be informed – you have a right to be told what personal information we hold about you, why we have it and if it is shared with third parties. Such information is provided in this Privacy Notice.
- The right to access – you have a right to see and have a copy of your personal information that we hold, unless a legal exception applies.

- The right to have inaccurate information corrected – you have a right to change any of your personal data that we hold that is inaccurate.
- The right to restrict use – you have the right to say that you don't want your data to be used in certain ways.
- The right to erasure – you have the right to ask that your personal data that we hold be erased, though some exceptions apply.
- The right to data portability – you have the right to ask for the information you have given to us to be transferred to another service provider.
- The right to object to the use of data – you have the right to object to your data being used in certain ways.
- The right not to be subject to automated decision-making including profiling – we do not undertake automated decision-making or profiling and this is unlikely to change. If it does we will inform you of this and you would have the right to object.

If you wish to exercise any of these rights then please put your request in writing by email to [reunite@dircon.co.uk](mailto:reunite@dircon.co.uk) or by post to reunite International Child Abduction Centre, PO Box 7124, Leicester, LE1 7XX.

There are some legal exceptions that may limit your rights detailed above. For more information please see the guidance issued by the UK Data Protection Regulator, the Information Commissioner's Office, at <https://ico.org.uk/>.

### **Complaints**

If you have a complaint about how we are using your personal information, please send us your complaint in writing to [reunite@dircon.co.uk](mailto:reunite@dircon.co.uk) or reunite International Child Abduction Centre, PO Box 7124, Leicester LE1 7XX.

You can also lodge a complaint about how we are using your personal information to the Information Commissioner's Office at <https://ico.org.uk/>.