

# Turning Moment Privacy Statement

## 1. Who we are and what we do

Turning Moment is an independent conflict resolution consultancy that has been in operation since 2008. Based in County Durham, we operate throughout the UK and beyond to support organisations and businesses in dealing with conflict and disagreement at work.

## 2. What type of personal information do we collect and how do we collect it?

We may collect the following types of Personal Data:

- Your name, postal address, email address, telephone number and other contact information that allow us to meet our business purpose.

We may collect your Personal Data as follows:

- when you contact us via telephone or email.
- when you complete a form through our website.
- when we discuss details relating to the purpose of mediation, review, facilitation and training discussions.
- when we collate, summarise and anonymise data and information for informal review and neutral assessment reports.

## 3. What is our power to obtain and use the personal data?

Lawful Basis (Article 6)

- a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

## 4. What is your personal information used for?

- To provide you with our services, and to develop and improve the services.
- To ensure that the information we hold about you is kept up to date.

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## 5. Will your personal information be shared?

- We will not share your personal data without explicitly seeking your permission first.
- When we are conducting informal review and neutral assessments, we aggregate, summarise and anonymise personally identifiable information before sharing.

## 6. How do we keep your personal information secure?

The security of your personal information is important to us. We follow a range of security procedures to control and safeguard access to and use of your personal information:

- Controlling access to systems and networks allows us to stop people who are not allowed to view your personal information from getting access to it.
- Encryption, meaning that information is hidden so that it cannot be read without special knowledge (such as a password). This is done with a secret code or what's called a 'cypher'. The hidden information is said to then be 'encrypted'.
- Pseudonymisation, meaning that we'll use a different name so we can hide parts of your personal information from view.
- Coaching for our staff allows us to make them aware of how to handle information and how and when to report when something goes wrong.
- We do not allow the recording of meetings, sessions or workshops either covertly or overtly.
- Regular testing of our technology and ways of working including keeping up to date on the latest security updates.

## 7. How long will we keep your personal information?

After we deliver a service to you, we keep your information as a business record of what was delivered for a period of 5 years.

For specific services such as mediation and review processes, we delete your information and data as soon as is practicable after the work is finished – (normally 2- 5 weeks).

Where there is a legal requirement for us to keep personal information for a longer period, we will undertake to do so.

## 8. Is your personal information processed overseas?

Your personal information is not processed overseas.

## 9. Marketing

At no time will your information be passed to organisations external to us for marketing or sales purposes or for any commercial use without your prior express consent.

## 10. What are your Information Rights?

Your Information Rights are set out in law. Subject to some legal exceptions, you have the right to:

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- have any inaccuracies corrected.
- have your personal data erased.
- place a restriction on our processing of your data.
- object to processing.
- request your data to be ported (data portability).

If you wish to exercise your information rights, please contact: [info@turningmoment.co.uk](mailto:info@turningmoment.co.uk) marked for the attention of the Data Controller.

You also have the right to request a copy of the personal information we hold about you. To do this, please contact: [info@turningmoment.co.uk](mailto:info@turningmoment.co.uk), marked for the attention of the Data Controller.

To learn more about these rights please see the [ICO website](#).

If something goes wrong with your personal information, or you have questions about how we use it, please contact: [info@turningmoment.co.uk](mailto:info@turningmoment.co.uk), marked for the attention of the Data Controller.

If we have not been able to deal with your complaint, you can also contact the [Information Commissioner's Office](#).

***Last updated: 21st January 2021***