



## Privacy Notice

### Your personal data

This Privacy Notice explains the type of information (also called data) we collect, why we collect it, how we use it, who we might share it with and how to correct or modify it.

We are unable to provide our services without processing your personal data as detailed below. By instructing us to provide dispute resolution services you agree to the processing of your personal information for the purposes described below.

### What types of data do we collect and process?

We process personal data about lots of different categories of people, including the parties who instruct us and appoint an individual from our panel; other participants involved in the disputes in which we are instructed and/or an individual from our panel is appointed; people we have relationships with; and third parties who interact with us.

If you are a user or purchaser of our dispute resolution services, we collect and process personal information in order to facilitate the provision of those services. The types of data we process will usually include full names, contact details, identification; details of the circumstances of your dispute (including any claim or defence) and any damage, injury or loss suffered by you and other associated information.

Depending on the nature of our relationship with you, we may also process information about your date of birth; employment; business and company affiliations; financial affairs; family, lifestyle and social circumstances; education and employment background; the services we provide you or your company; your relationship with us; and the goods or services you or your company provide us.

In some circumstances we may process special categories of personal data about you, in which case we take particular care to only process such data in accordance with the strict legal parameters. This type of data can include information about your health; racial or ethnic origin; religious or political beliefs; trade union membership; sex life or sexual orientation; genetic or biometric data; or philosophical beliefs.

Most of this information will have been provided by you, however there may be instances where it comes from other sources or third parties (including publicly available information). Such third parties might include, for example, professional advisors, parties to your dispute, participants in the dispute resolution process, suppliers, creditors, debtors, regulators and professional bodies.

Your personal data will be held in electronic format.

Where you provide us with personal data about other people, please ensure you provide them with a copy of this Notice, where appropriate to do so.

If any information changes, please let us know so that we can keep it updated on our systems.

### Squaring Circles

PHILOSOPHICAL MEANING – to see equally in four directions – up, down, in and out

METAPHORICAL MEANING – attempting anything that seems impossible



## Why do we collect your personal information?

We collect and process your personal information for the purpose of providing dispute resolution services and also for our own general business purposes.

We collect and use your personal information where we have a lawful basis for doing so. In general, it will be for the following purposes:

1. The provision of our dispute resolution services.
2. The management of your dispute and associated administration including conflict checking, billing and collecting debts.
3. The legitimate business purposes associated with operating our business (this includes carrying out the business of providing dispute resolution services and pursuing our general business interests).
4. To comply with our legal and regulatory obligations.

In addition, in some circumstances we may process personal data on the basis that you have provided your consent, for example, through instructing us on a matter (including, in some instances, in respect of special categories of personal data about you – such as, data about your racial or ethnic origin, political opinions, religious beliefs or data concerning your health). Please note that you have the right to withdraw any such consent, which you can do at any time by emailing [admin@squaringcircles.uk](mailto:admin@squaringcircles.uk).

## Who do we share your data with?

In providing our services and in complying with our legal obligations, we may share the personal information that we obtain about you, insofar as we are permitted by law to do so, with the following third parties:

- [Amigus ID](#) for the purpose of conducting digital identification checks. In relation to information about your identification (including copies of your passport or driver's licence), we will only ever process that information digitally using Amigus ID. You will be required to accept the terms and conditions of Amigus before being able to use that service.
- [MODRON](#) for the purpose of managing your dispute, secure sharing of documents, video and electronic communications, and invoicing. You will be required to accept the terms and conditions of MODRON before you are onboarded to use the platform.
- [Zoom](#) for conducting video conferencing calls.
- [FreeAgent](#) for issuing accounting purposes and issuing our invoices.
- [Appointedd](#) for the electronic booking of appointments.
- [Adobe Sign](#) for the purpose of obtaining electronic signatures of certain documents necessary for the provision of our dispute resolution services; the services we provide you or your company; your relationship with us; and the goods or services you or your company provide us.

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- Third parties involved in your dispute including (without limitation) participants to a mediation or arbitration, counterparties, expert witnesses, consultants, counsel (Faculty of Advocates), law firms or other professionals, and other third parties involved in any dispute in which we are providing our services.
- Suppliers and service providers used by us in providing services, details of which can be made available on request, including (without limitation) postal services, IT service providers such as cloud providers of software as a service, data room providers and providers of our IT servers.
- Our accountants, legal and other professional advisors, our banks, insurers and insurance brokers.
- Government agencies (including Her Majesty's Revenue & Customs), regulators and other authorities.
- Our and your trade associations, professional bodies and business associates.
- Third parties providing us with support and administrative services in the management of your dispute.

We will not sell your personal data to a third party. The only exception to this is the unlikely event that we sell our business, or a part of it, in which case we may sell your information as part of that sale.

The personal information we hold on you will be stored securely on third party cloud platforms operated by Amiqus ID, MODRON, Adobe Sign, FreeAgent, Appointedd, iCloud and Microsoft 365.

## How long do we keep your personal data?

We will retain your personal information for as long as it is reasonable and necessary for the use for which we have collected it or as otherwise set out in our Terms of Engagement. If you have any questions or any concerns about how long we keep your information for, please contact [admin@squaringcircles.uk](mailto:admin@squaringcircles.uk).

## Updating this policy

We may amend this policy at any time by posting a revised version on our [website](#).

## What are your rights?

You have rights under data protection laws to request from us access to, rectification of, or erasure of your personal data. You also have the right to request the restriction of any processing or to object to our processing of your personal data. Finally, you have the right to data portability. Please contact [admin@squaringcircles.uk](mailto:admin@squaringcircles.uk) to exercise your rights. You can find more information about your rights at [www.ICO.org.uk](http://www.ICO.org.uk).

You have the right to lodge a complaint with the Information Commissioner in respect of our processing of your personal data. Information can be found at [www.ICO.org.uk](http://www.ICO.org.uk). If you would like to raise your complaint with us in the first instance, please see our Complaints Procedure available on our [website](#).

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