PARTNER ABUSE INTERVENTIONS LTD

**DATA PROTECTION NOTICE**

PAI Ltd respects your right to privacy.  In this Privacy Policy we explain who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights.  If you have any questions or concerns about our use of your personal information, then please contact Chris Newman, chris@fsa.me.uk. PAI Family Safety Assessments The Courtyard 4 Evelyn Road London W4 5JL 0203 137 5494

We collect your personal information such as name, email address, postal address, telephone number, gender and date of birth.  We need the personal information to provide services to you.  We retain personal information we collect from you where we have an ongoing legitimate business need to do so (please note that reference to “you” or “your” herein encompasses non-exhaustively “you, your company, employees and / or clients”).

We may disclose your personal information to:

* **third party services providers and partners** who provide data processing services to us or who otherwise process personal information for purposes that are described in our Privacy Policy;
* any **competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your interests or those of any other person;
* a **potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in our Privacy Policy; or
* any **other person with your consent** to the disclosure.

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident.  Where such processing or transfers take place, we ensure that appropriate legal protections are in place as required by the EU General Data Protection Regulation (‘GDPR’) and the UK Data Protection Act 2018 (‘the Act’), such as the European Commission’s Standard Contractual Clauses.

 We use appropriate technical and organisational measures to protect the personal information that we collect and process about you.  The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

You are entitled to know what data is held on you and to make what is referred to as a **Data Subject Access Request (‘DSAR’)**.  You are also entitled to request that your data be **corrected** in order that we hold accurate records.  In certain circumstances, you have other data protection rights such as that of **requesting deletion, objecting to processing, restricting processing** and in some cases **requesting portability**.  Further information on your rights is included in our Privacy Policy.

We will not use your personal data for marketing purposes.

 If we are relying on your consent as our lawful basis for collecting and processing your personal information, then you can **withdraw your consent** at any time, which will require us to stop processing this personal information.  Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.  You have the **right to complain to a data protection authority** about our collection and use of your personal information.

Cookies

Our website dies not use cookies to track your browsing pattern or to build a profile of how you and other users use our sites.

 **PRIVACY POLICY**

We take the privacy of our customers very seriously and are committed to protecting your privacy. This policy explains how we collect, use and transfer your personal data, and your rights in relation to the personal data stored by us when you use our website or otherwise engage with our services.

This policy sets out the following:

·         What personal data we collect about you and how;

·         How the data is used;

·         Our legal basis for collecting your information;

·         Who we share your data with;

·         Where we transfer your information;

·         How long we retain your information for;

·         Your rights and choices in relation to the data held by us;

·         How to make a complaint in relation to the data held by us; and

·         How to contact us with any queries in relation to this notice, or the personal data held by us.

·         It also contains information about how we use cookies on our website.

Who is PAI Ltd?

ADD COMPANY PREAMBLE

For the purposes of European and UK data protection laws, if you are visiting our website ADD LINK (our "Website") or otherwise engaging with our services from the UK or the European Economic Area (or "EEA"), the data controller of your information is PAI Ltd.

What is personal data?

In this privacy notice, references to “personal information” or “personal data” are references to data that can be used to identify you.  Some examples of personal data are your name, address and telephone number but it may also include information such as your IP address and location.

What personal data do we collect?

Information that you provide voluntarily

In order to provide services to you we may ask you to provide personal information.  This may include, amongst other things, your name, email address, postal address, telephone number, gender, date of birth, and passport number.  The personal information that you are asked to provide and the reasons why you are asked to provide it, will be made clear to you at the point at which we ask you for it.

Some of the information that you provide may be “sensitive personal data”.  “Sensitive personal data” includes information relating to your physical or mental health, racial or ethnic origin, political opinions, sexual life, criminal history, trade union membership or religious beliefs.

Information that we collect automatically

When you visit our Website, we may collect certain information automatically from your device.  In some countries, including countries in the EEA, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information.  We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Collecting this information enables us to better understand visitors to our Website, where they come from, and what content on our Website is of interest to them.  We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading “Cookies" below.

 Information that we obtain from third party sources

From time to time, we may receive personal information about you from third party sources but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

For example, if you are an individual who has been referred to us by the Family Court for a Domestic Violence Risk Assessment, the Court will provide us with your details, including those of your case.  For information about how the Court uses and shares your personal data, please refer to the Court’s own privacy statement.

We may also collect personal data from the following sources in order to provide services to you:

* Government agencies;
* Court judgments;
* Family members; and
* As required, witnesses and subject matter experts.

How is personal data used?

We may need to use your personal data in order to carry out the following activities:

* To set you up as a new client;
* To undertake a family court assessment;
* To carry out therapeutic or psychoeducational work
* To accept payments from you, if applicable;
* To communicate with you about your case or assessment;
* For general administration purposes;
* To comply with our legal and regulatory obligations;
* To defend or prosecute legal claims
* To respond to your enquiries.

Our legal basis for collecting your information

If you are from the EEA, our legal basis for collecting and using your personal data will depend on the personal data concerned and the specific context in which we collect it.

However, we will normally collect personal data where we need the information to provide you with our services / perform a contract with you, where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms, or with your consent.

In some cases we may use your personal data for a legal obligation.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).  You are under no obligation to provide personal data to us.  However, if you should choose to withhold requested data we may not be able to provide you with certain services.

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “Contact Us" section below.

Who is your personal data shared with?

* We may disclose your personal information with the following categories of recipients.
* to third party service providers and partners who provide data processing services (for example to assist in the performance of our services) or who otherwise process personal information for purposes that are described in this Privacy Notice (see “How does PAI Ltd use my personal data?”).  A list of our current service providers and partners may be available upon request;
* to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
* to any other person with your consent to the disclosure.

International Transfers

Your personal data may be transferred to, and processed in, countries other than the country in which you are resident.  However, we have taken appropriate safeguards to require that your personal data will remain protected in accordance with this Privacy Notice.  These include implementing the European Commission’s Standard Contractual Clauses for transfers of personal information.

How long is personal information retained for?

We will keep your personal data on our records for as long as we have an ongoing legitimate business need to do so.  This includes providing you with a service you have requested from us, or where we are required to keep your data for legal or regulatory reasons.  Please contact us using the contact details provided under the “Contact Us" section below should you require further information on our Record Retention procedures.

We may also retain your personal data where such retention is necessary in order to protect your vital interests or the vital interests of another natural person.

Your Rights as a Data Subject

Your principal rights under data protection law are as follows:

**a)**the right to access;

**b)**the right to rectification;

**c)**the right to erasure;

**d)**the right to restrict processing;

**e)**the right to object to processing;

**f)**the right to data portability;

**g)**the right to complain to a supervisory authority; and

**h)**the right to withdraw consent.

* If you wish to access, correct, update or request deletion of your personal information, we will ask you to provide us with a copy of any two of the following documents:  Driver’s licence; Passport; Birth certificate; Bank statement (from the last 3 months); or Utility bill (from the last 3 months).  With regards to your right of access, the first access request will be complied with free of charge but additional copies may be subject to a reasonable fee.
* In addition, if you are a resident of the European Union or the UK, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information.
* Similarly, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time.  Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
* You have the right to complain to a data protection authority about our collection and use of your personal information.  For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

You may exercise any of your rights in relation to your personal data by contacting us using the email admin@fsa.me.uk or the details set out in the “Contact us” section at the bottom of this page.

Automated decision making

Our use of your personal information will not result in automated decisions being taken (including profiling) that legally affect you or similarly significantly affect you.

Marketing

As mentioned above, we will not use your personal data to send you marketing materials.

Security

PAI Ltd places great importance on the security of all personal data associated with our clients.  We have security measures in place to attempt to protect against the loss, misuse and alteration of personal data under our control.

For example, our security and technology policies are periodically reviewed and enhanced as necessary and only authorised personnel have access to user information. The service we use to store personal data ensures that servers are kept in a secure environment.

Whilst we cannot ensure or guarantee that loss, misuse or alteration of data will not occur, we use our best efforts to prevent this.

Cookies

Our site dies not use cookies to track your browsing pattern or to build a profile of how you and other users use our sites.

**Contact us**

If you have any questions about this Privacy Notice, please contact us using the following contact details:

Data Protection

PAI Family Safety Assessments
The Courtyard
4 Evelyn Road
London W4  5JL

0203 137 5494
07482 236 029

email: admin@fsa.me.uk
website: [www.fsa.me.uk](http://www.fsa.me.uk/)