

Updated: 25<sup>th</sup> May 2018

## **Introduction**

CDRL is a not for profit alternative dispute resolution (ADR) provider, approved under the Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015. CDRL is dedicated to safeguarding and protecting your privacy when visiting our site or communicating with us.

Please read this Privacy Statement carefully as it applies when you visit our site or use our service. This Statement is applicable exclusively to our site (inclusive of our ADR channels – Consumer Arbitration, AviationADR, UtilitiesADR, Commercial Energy Arbitration and to other websites that may be viewed by users via links present on the site.

We do update this Statement from time to time so please do return and review this regularly.

This Privacy Statement explains how we obtain and utilise your personal data. All your personal data shall be held and used in accordance with the EU General Data Protection Regulation 2016/679 (“GDPR”) and national laws implementing GDPR and any other legislation relating to the protection of personal data.

### **1. Collection and use of personal information**

You provide us with the information we collect and use about you. If you ask us to look into a dispute you have with a company, we will ask you to authorise them to provide us with their side of the story. They will provide any relevant information about you, your account(s) the goods or service etc.

We collect personal data in order to provide and operate our service effectively. We additionally collect data of third parties and prospective employees. We will only collect the minimum personal information needed to complete a task and will not collect information just in case.

We will take care of your personal data and will only use it to process your enquiry or investigate your complaint and to help us improve service quality. Following completion of the complaint investigation, your information may be used as the basis for creating an anonymous case report and this may, in turn, be used to build scenarios for training and reporting purposes but these will contain no personal information.

The personal data we collect includes:

- Full name
- Full address
- Email address
- Mobile and/or landline telephone number

Information received from your device or software may also be collected and stored. This information can include an IP address, browser type, domain names, access times and website address.

### **2. How we obtain personal data**

At points in our site, we invite or request you to submit your contact details or other information about yourself or your organisation, or to send us emails which will, of course, also identify you.

We collect personal data via electronic webforms or via phone or face to face contact.

We do record our telephone calls for quality and training purposes. You will be told about this in a recorded message before your call is put through to a member of staff.

Calls that are recorded for these purposes will be kept secure, will not be disclosed outside CDRL and will be deleted after a maximum period of 12 months. However, you are entitled to object to this and can choose to opt out of call recordings by following the instructions.

### **3. Retention and deletion policy**

When you provide us with your personal information we will only retain it for as long as we need to, to make sure that we have dealt with all aspects of your enquiry or complaint. In practice, this means that we will keep your name and address for a minimum of six months if you make an enquiry or submit a complaint which is deemed to be out of scope (as per the scheme rules).

Once we have archived your complaint and provided a determination to you, we will only store all personal data for 12 months. After this, the information will be deleted. All personal information held by CDRL will be deleted in a structured, secure and timely manner.

### **4. Disclosure of your personal information**

In order to process your complaint we shall usually need to disclose the personal information you send us to the company. We may then need to disclose it to a third party such as an independent expert, to help us determine the case.

To help us process our work we have contracts with companies who provide us with services such as IT support. Where they process your data for us our contract with them makes clear that they must hold it securely and only use it as we instruct them to. If your case raises issues which we think might be more appropriate for one of the regulators, we will only pass your information on with your consent.

Examples of the types of third parties we will engage with to provide our service are;

1. a) Web developers who are specifically engaged in, the development of World Wide Web applications, or applications that are run over HTTP from a web server to a web browser. Developers also assist in updating the software we use to process complaints.
2. b) Phone system software and service providers who supply our telephone systems.
3. c) Cyber security services, which complete checks and maintain our cyber security system.
4. d) Printing services whom supply our printing machines and maintenance.
5. e) Website hosts provide our server space and web services.

All such parties are required to maintain the confidentiality of your information by agreeing to provide adequate protections for personal data in line with GDPR and other data protection laws.

### **5. Website**

Your privacy is important to us. Our privacy policy is intended to give you confidence in the privacy and security of the personal information we obtain from you.

We promise to protect your privacy and treat the information you give us as confidential. Please note: We are not responsible for any use of your personal information you provide to third-party websites that may be accessed via our website or Websites. We recommend that you review the privacy policy of any third-party applications or websites that you use.

## **6. Changes to the privacy policy**

Changes in this policy will be posted on our Website. You are advised to check our Websites regularly to view our most recent privacy policy.

## **7. Access to your information**

Clients and individuals have the right to access information held about them to ensure that such personal data is accurate and relevant for the business purposes for which it was collected.

To understand what personal information we hold, you will need to place a Subject Access Request in writing to our nominated Data Protection Officer, at [dataprotection@cdrl.org.uk](mailto:dataprotection@cdrl.org.uk). We have one month in which to provide the information you request and will provide you a copy of the information free of charge.

## **8. Our legal basis for processing**

Under GDPR, the grounds which we rely upon to process your personal data are:

- You may voluntarily provide us with your consent to process your data for a particular purpose.
- It may be necessary for compliance with our legal or contractual obligations.
- It may be necessary for the purposes of legitimate business – either we, or a third party, will need to process your information for the purposes of our (or a third party's) legitimate interests, provided we have established that those interests are not overridden by your rights and freedoms, including your right to have your personal data secured.

## **9. Incident handling**

We will report all serious data breaches to the Information Commissioner's Office ("ICO") within 72 hours which result in the loss, release or corruption of personal data.

The definition of a serious breach is where CDRL's data security has been compromised resulting in the loss or disclosure of a client's personal or sensitive data which could prove detrimental to the individual's financial, physical or emotional well-being.

Detrimental effect would include information leading to;

- Identify theft
- Financial hardship
- Insurance exclusion
- Volume affected – 10 individuals

A non-reportable breach will be the compromise of CDRL's data security resulting in the loss or disclosure of staff members' personal data where there is no particular sensitivity and would not result in an individual being adversely affected.

All breaches are recordable and will be documented in our Personal Data Security Breach Log.

## **10. Your rights**

GDPR and other applicable data protection legislation afford you a variety of rights, we are obliged to tell you these rights include:

- The right to be informed about how your personal data is being used (as per this Statement).
- The right to access the personal data we hold on you.
- The right to request we rectify any incorrect personal data we hold about you.
- The right to request we delete your data, or stop processing it, in some circumstances.

- The right to stop any unauthorised transfer of your data to a third party.
- The right to complain to your data protection regulator with regards to the way in which we process your personal data — in the UK, the Information Commissioner's Office.
- The right to withdraw your consent. If you object to us processing your personal data, or if you have provided your consent to processing and you later decide to withdraw it, we will respect your choice in accordance with our legal obligations. Should you wish to exercise this right, please contact our nominated Data Protection Officer, at [dataprotection@cdrl.org.uk](mailto:dataprotection@cdrl.org.uk).

Your objection (or withdrawal of any previously given consent) could mean that we are unable to perform the actions necessary to achieve a purpose. Please note you may also not be able to make use of our services without such information. After your consent has been withdrawn, we may still be able to process your personal data, only to the extent required or otherwise permitted by law. This is particularly in connection with exercising or defending our legal rights and/or meeting our legal and regulatory responsibilities.

## 11. Cookie policy

This is part of our overall privacy policy. Further information about what a cookie is and how CDRL uses them is available on the 'cookie settings' page of this website. On this page you can also adjust cookie levels.

### Your cookie settings

Cookies are small text files that are placed on your device by the websites you visit. Cookies help make this website function appropriately and provide information to us about how users interact with our site. We use this information to improve our website.

We may use any of the following cookies:

- Analytical or performance cookies: these enable us to recognise and count the number of visitors to our site and to see how visitors use the site. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies: These are used to recognise when you return to the website. This enables us to personalise our content for you.
- Targeting cookies: These cookies record your visit to the website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed more relevant to your interests.

All computers have the ability to decline cookies. This can be done by activating the setting on your browser which enables you to decline the cookies. Please note that should you choose to decline cookies, you may be unable to access particular parts of our website. By continuing to use our website without changing your privacy settings, you are agreeing to our use of cookies. To find out more about cookies, including how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). Please note that by deleting or disabling future cookies, your user experience may be affected, and you might not be able to take advantage of certain functions of our site. We may therefore be unable to fulfil our expected experience we aim to provide to our users.

### What cookies do we use?

The below table details which cookies we use and what their purpose is. We define the cookies that we use as either Strictly necessary or Performance related.

#### Strictly Necessary Cookies

Cookies defined as Strictly necessary enable you to move around the website and use its features. Without these cookies, you may experience problems using our website.

Cookie name	Purpose
PHPSESSID	This cookie is used to identify your unique browsing session to the webserver and to temporarily store some information entered into website forms, so that can be 'remembered' between visits to different pages.
dismissed	This cookie is used to store the response to a warning that is displayed if you are using an older, unsupported, browser, so that the alert does not persistently interfere with the browsing experience.
CDRL-cookie	This cookie is used to store the option chosen in the cookie settings page so that your settings are preserved when you return to this website.

### Performance Cookies

Without these cookies, we will not be able to determine the number of visits to our website, or how they use and navigate the website. We use this information to enhance our service to you. It is not used to identify you personally.

Cookie name	Purpose
__utma __utmb __utmc __utmv __utmz	These cookies are used to gather statistical usage and performance data relating to the website, enabling us to ensure that the website is performing optimally.

### 3rd Party Cookies

This website uses content from 3rd party websites. These 3rd parties also use cookies for various purposes. For more information on what cookies are used and what they are used for please visit the links below.

Cookie name	Purpose
guest_id __utma __utmz twll remeber_checked remeber_checked_on	We use a Twitter feed plugin on the home page of this website. This plugin is used to display the latest tweets from CDRL.