



Data Protection Policy

In accordance with the General Data Protection Regulation ("GDPR") coming into effect May 2018, this policy has been drawn up to provide the information on the types of data held and for what purpose information is collected by Looking Lovely Nails & Beauty ("the Salon")

The lawful bases for processing are set out in Article 6 of the GDPR. At least one of these must apply whenever you process personal data:

(a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.

(b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

(c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).

(d) Vital interests: the processing is necessary to protect someone's life.

(e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

(f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

The primary requisite for collecting personal data in the Salon is to be able to provide a thorough, personally appropriate treatment to a client. Individual clients may have any number of medical contra-indications to a treatment that may either provide evidence the treatment can be safely carried out, that the treatment can be carried out in a modified format, or that the treatment should not be carried out, or not without medical (GP) consent.

It is the Salon's responsibility to ensure that the health and safety of every client is foremost and that includes the client's suitability for any particular treatment.

In order to do this, a client consultation form (CCF) is used to capture personal data to evidence the suitability of any treatment.

The data that the Salon will require to hold for each individual client is:

Name and contact details:

A client's first name and surname should be recorded in every instance, together with a point of contact for the client. Ideally a mobile phone number, email address and home address.

These details will be used to input appointment times into the online diary system. The online diary system is able to send automated reminders to clients and electronic marketing messages. The online diary also acts as a treatment record. The lawful basis for collecting this data will be **(a)**

Consent: the individual has given clear consent for you to process their personal data for a specific purpose.



Clients will be able to confirm whether or not they wish to receive the reminders and also whether they wish to receive electronic marketing messages. The Salon will never bombard clients with marketing messages.

A second set of data will be held as a paper record. The paper CCF will include the medical information required to ascertain suitability for treatments. The lawful basis for collecting this data will be **(d) Vital interests: the processing is necessary to protect someone's life.**

This information will be held in a locked cabinet and access to this information will be restricted to the Salon employees only. Information will be accessed prior to each appointment, to ensure that the CCF is up to date and to allow the client the opportunity to amend any data held. At a later date, this information may become computerised, but the same strict "virtual locked cabinet" will still apply.

A Privacy Notice will be displayed prominently in the Salon to advise clients of the type of data being collected, the reasons for the data collection and their rights regarding this data (Schedule 1)

Signed.....
JULIE ASHDOWN

Date.....



Privacy Notice

This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us, offline or online, When we collect, store and use your personal information, we do so in accordance with the rules set down by the General Data Protection Regulation (the GDPR).

Our responsibilities as a 'controller' under the GDPR

Controllers are defined by the GDPR as natural or legal persons, a public authority, agency or other body to which personal information or personal data has been disclosed, whether via a third party or not, and who determines the purposes and means of processing personal information. We are a collector under the GDPR as we collect, use and store your personal information to enable us to provide you with our goods and/or services.

As a collector, we have certain obligations under the GDPR when collecting, storing and using the personal information . Your personal data will:

be processed lawfully, fairly and in a transparent manner by us;

only be collected for the specific purposes we have identified in the 'collection and use of personal information' clause above and personal information will not be further processed in a manner that is incompatible with the purposes we have identified;

be collected in a way that is adequate, relevant and limited to what is necessary in relation to the purpose for which the personal information is processed;

be kept up to date, where it is possible and within our control to do so (please let us know if you would like us to correct any of your personal information);

be kept in a form which permits us to identify you, but only for so long as necessary for the purposes for which the personal data was collected; (and in accordance with our insurance requirements)

be processed securely and in a way that protects against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Specifically, we have the following measures in place, in accordance with the GDPR:

Data protection policy: We have an internal policy in place which sets out where and how we collect personal information, how it is stored and where it goes after we get it, in order to protect your personal information.

Right to ask us to erase your personal information: You may us to erase personal information we hold about you.



Right to ask us to restrict data processing: You may ask us to limit the processing of your personal information where you believe that the personal information we hold about you is wrong (to give us enough time to verify if the information needs to be changed), or where processing data is unlawful and you request us to restrict the processing of personal information rather than it being erased.

Maintain Records of Processing Activities:

Notification of data breaches: We will comply with the GDPR in respect of any data breach.

Personal information

Personal information: The types of personal information or personal data we may collect about you include:

your name; images; your contact details, including email address, mailing address, street address and/or telephone number; your age and/or date of birth; your preferences and/or opinions; medical history; information you provide to us through customer surveys; details of products and services we have provided to you and/or that you have enquired about, and our response to you; additional personal information that you provide to us, directly or indirectly, through your use of our website, associated applications, associated social media platforms and/or accounts from which you permit us to collect information; and any other personal information requested by us and/or provided by you or a third party (for example, Gift Vouchers that may be purchased online for you).

We may collect these types of personal information directly from you or from third parties.

Collection and use of personal information

We may collect, hold, use and disclose personal information for the following purposes:

- to enable us to carry out beauty treatments on you, or to ascertain your suitability for any treatment;
- to enable you to access and use our website, associated applications and associated social media platforms;
- to contact and communicate with you;
- for internal record keeping and administrative purposes;
- for analytics, market research and business development, to run competitions and/or offer additional benefits to you;
- for advertising and marketing, including to send you promotional information about our products and services that we consider may be of interest to you;
- to comply with our legal obligations and resolve any disputes that we may have;



Disclosure of personal information to third parties

We may disclose personal information to:

third party service providers for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage, debt collectors, maintenance or problem-solving providers, professional advisors and payment systems operators; courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;

courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;

Where we disclose your personal information to third parties, including data processors, we will request that the third party handle your personal information in accordance with this Privacy Policy. The third party will only process your personal information in accordance with written instructions from us and we require that the third party either complies with the privacy shield principles set out in the GDPR for the transfer and processing of personal information. By providing us with personal information, you consent to the disclosure of your personal information to third parties

How we treat personal information that is also sensitive information

Sensitive information means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation, sexual practices or sex life, criminal records, health information or biometric information.

Provided you consent, your sensitive information may only be used and disclosed for purposes relating to the primary purpose for which the sensitive information was collected.

Sensitive information may also be used or disclosed if required or authorised by law.