Anne Roberts Oxton Ltd Privacy Policy

5-16-2018

Salon Privacy Policy

Your privacy and the protection of your data is a top priority for Anne Roberts Oxton Ltd, and we are dedicated to looking after your personal information safely and securely.

The new General Data Protection Regulation (GDPR) updates and strengthens the old Data Protection Act and brings with it new rights and greater control for individuals.

We have taken this opportunity to update our privacy policy and we'd recommend you have a good read of it, but please let us know if you have any questions – we're here to help.

This policy includes:

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1. About Us

We are Anne Roberts Oxton Ltd, a company registered in England and Wales No. 09177691 with our registered office at Unit 3, Prenton Business Park, Prenton Way, Wirral CH43 3EA. We trade as Anne Roberts Hair & Beauty and Anne Roberts Aesthetics at 80 Birch Road, Oxton, Prenton, CH43 5UE.

We are a hair and aesthetic treatment clinic that has been in business since 1989 and we pride ourselves on delivering the very best in customer service along with a wealth of expertise.

Our company is committed to protecting your privacy and maintaining the security of any personal information received from you.

Our Data Protection representative will be happy to deal with any queries or requests regarding the data we hold about you. They can be contacted at DP Enquiries, Anne Roberts Oxton Ltd, 80 Birch Road, Oxton, Prenton, CH43 5UE, or through <u>anne@annerobertsoxton.com</u> Please add 'Data Protection' in the email subject line.

2. Information we collect

Information we collect about you

Our website provides you with our contact information. We do not collection any of your personal information via our website. However, if you call or email us, we will collect your name and/or email address. This allows us to respond to your enquiry and supply you with the information you have requested.

When you register with us, we also ask you to provide other contact details, such as mobile phone number and email address to alert you to product upgrades and special offers and to offer you an appointment text reminder service. Providing additional contact details for our marketing activities or appointment reminders is not a prerequisite for treatment services – you will be asked to agree to receiving these communications when you register with us and even if you agree at the time, you will always have the right to withdraw your consent to all or any communications from us.

We also collect photographs to record the stages of treatment you have had and, with your agreement, for anonymised marketing activities in our printed publications, presentations, promotional materials and our website. Again, you do not need to give consent to the marketing activities as a condition of receiving treatment, and even if you agree at the time, you have the right to withdraw your consent at any time in the future.

Registration will also collect additional personal data from you such as date of birth and home address. This data is used for administration of your account.

In order to undergo certain beauty treatments, you must be 18 years old or over and will need to provide proof of this before treatment can commence. You will be advised regarding this when booking treatments.

We do collect 'special category' information about you related to your health - if you book in for treatment or another service, we will ask you to give us some medical information such as known allergies, existing and previous illnesses, current medication etc to ensure the safety and health of our clients, our therapists and other people in the Salon.

We do collect some information from cookies, pixels and similar software which allows us to understand how you arrive on our websites, how you use and navigate around them, and how you interact with our email. This information is used to improve our services and communication. We obtain some information from Google Analytics and Facebook. The Facebook information provided is limited to your email address and only that which you have previously agreed with Facebook that they can share.

Other information we collect

Our safe and secure card payment system takes payment from your account but does not store your card details on our system.

3. How we use the information

We will use your personal information for a number of purposes including:

- To send you special offers, information on new products and services;
- To deal with your requests and queries;
- For administration purposes;
- To take payments for services and goods;
- For analysis and research to improve our services and goods offered;
- To conduct surveys with you (where you have consented to us contacting you for such purpose).
- To provide personalised communications (more details below).

- To provide advanced website features to you and others.
- We use IP addresses and device identifiers to identify the location of users, to establish the number of visits from different countries, to limit/cap adverts of a certain type, and to personalise content and emails.
- To improve your search results.
- A certain amount of advertising is tailored to the individual based on viewing and/or purchase habits.

Service messages

We send service emails and text messages to you to administer our services. Service emails include providing useful information following treatment. We will also send you a service email if we make a fundamental change to the website, or to our terms & conditions that we think we need to make you aware of, or to let you know important information about your account. Service text messages include appointment reminders, payment confirmations and 'late notice' special offers.

Marketing messages

We use your email address to update you on new products, services and subscription offers. We will only contact you with your consent. You are entitled to withhold this consent and refrain from receiving such communications by contacting us through email at <u>anne@annerobertsoxton.com</u>, by calling 0151 653 7979 or by post to DP Enquiries, Anne Roberts Oxton Ltd, 80 Birch Road, Oxton, Prenton, CH43 5UE. We will always provide you with a way of opting out of receiving future marketing messages from us each time we send them to you.

4. What if I don't provide some or all the information requested?

The impact of this will depend on what information you withhold, but the main impacts may be:

- We will not be able to proceed with a treatment.
- We will not be able to send you appointment reminders.
- We will not be able to send you special offers, discounts or information on related products or treatments that you may like to purchase.
- We will not be able to respond fully to requests and queries you may have.
- We cannot personalise the service you receive. So, if you are online you will have to search more for the content type you normally view or for similar/related products.

5. What grounds (lawful basis) are we processing the data under?

There are several lawful bases we process your data under. These are:

- Contractual we need the information to perform the contract for goods or services you have requested/ordered including payment, booking appointments etc.
- Vital interests we need medical information to ensure treatments or products are not contra indicative with your current medication or cause allergic reactions or other sickness due to your specific medical background or health related needs.
- Legal where we are legally required to contact you concerning a product or service.
- Legitimate interest where processing is to do with the legitimate interests of us running our business. Legitimate interest allows us to manage our relationship with you effectively and efficiently. It allows us to promote our business. It also allows us to improve the products and services we provide by better understanding how our online provisions are used and which goods are popular with which groups of individuals.
- Consent where you have given us consent to market to you and contact you.

6. Sharing your information with third parties

We may from time to time provide your personal information to third parties for the purposes of providing you with our services. These third-party providers include providers of card validation services. This is necessary for the performance of the contract. We do not keep a record of your credit or debit card details in our systems.

Your personal information is held within the computer-based salon appointment system and accessed by staff only. Any additional medical information is held on paper record cards in a locked fireproof filing cabinet. Again, this information is only accessed by staff. Our IT support company has access to our hardware and software for support purposes only.

When transferring and storing any personal information outside the EEA we only use the legally recognised transfer mechanisms for ensuring the data is safeguarded. These are:

• The country in question has been deemed safe for data transfer by the European Commission. Also known as an adequacy finding.

- The contract for data processing contains the standard contractual clauses laid down by the European Commission to safeguard the transfer of personal data.
- Binding corporate rules this is where a large company's own internal processes for international data transfer have been signed off and agreed by the European Commission as safeguarding the data.
- If the data is going to the USA it can be safely transferred to a company that is certified under the EU-US Privacy Shield.
- Appropriate certification schemes

You are entitled to withdraw consent for such third-party communications at any time by contacting us by email at <u>anne@annerobertsoxton.com</u>, by calling 0151 653 7979 or by post to DP Enquiries, Anne Roberts Oxton Ltd, 80 Birch Road, Oxton, Prenton, CH43 5UE.

We will disclose your personal data in order to comply with any legal obligation. This includes disclosing information to organisations for the purposes of fraud protection, credit risk reduction, or the order of a court or regulator.

7. Sale of the Business

In the event that we undergo re-organisation or are sold to a third party, you will be notified and asked to agree that any personal information we hold about you may be transferred to that re-organised entity or third party. We will not transfer your information without your explicit consent.

8. Cookies

Our website uses cookies. For more information about what cookies are, what we use them for and how you can delete them, please read our cookie policy.

We do collect some information from cookies and similar software that allows us to understand how you arrive on our websites and use and navigate around them so we can improve the sites. We obtain some information from Google Analytics and Facebook. The Facebook information provided is limited to your email address and only that which you have previously agreed with Facebook that they can share.

9. How we protect your information

We follow strict security procedures in the storage and disclosure of information that you have given us, to prevent unauthorised access to, and loss, misuse or alteration

of your personal information in accordance with UK data protection legislation. These include physical security such as building alarms and CCTV, fireproof filing cabinets, restricted access, and technological security such as encryption, firewalls and virus-checking procedures.

Whilst we take these steps to ensure the security of your information, there is a risk that any information transmitted over the Internet and stored on a computer may be intercepted or accessed by an unauthorised party. If you think that someone has accessed your information held by us without your permission, you must notify us at <u>anne@annerobertsoxton.co.uk</u>

We also recommend that if you use a shared computer or a computer in a public place such as a library that you close your browser when you have finished your session.

10. Your rights regarding your Personal Information

You have a number of rights with respect to your personal information, which are:

• Correcting your Information

You are entitled to have your personal information updated to ensure it is up to date and accurate. In order to maintain the accuracy of the information we hold, please let us know about any updates to your personal information as soon as you can.

• Withdrawing Consent

You have the right to withdraw your consent to any processing that is currently being done under your consent, such as marketing.

• Obtaining a copy of your information

You have the right to receive a copy of the personal information we hold about you and we must respond within 1 month.

• Deleting your information

You can request that we delete personal information in certain circumstances. These will be specific to each case.

• Data Portability

In certain circumstances, you have the right to ask us to transfer the personal information that you have given us to another controller.

Restricting Processing

You can request a restriction on the processing of your data in some limited circumstances. Examples are concerns over data accuracy or we no longer need to hold your data but you have requested its retention by us to aid you in a legal matter.

• Object to Processing

You have the right to request that we stop processing your data for marketing purposes and in other limited circumstances such as asking us not to process your data by wholly automated means or not to analyse your information for targeted content etc. (also known as profiling).

You can action any of these rights by contacting <u>anne@annerobertsoxton.com</u>, from the email address associated with your account, providing the full name attached to your account. You can also write to us at DP Enquiries, Anne Roberts Oxton Ltd, 80 Birch Road, Oxton, Prenton, CH43 5UE. You can also phone us on 0151 653 7979.

11. Right of complaint to the Regulator for Data Protection

The data protection laws in the UK are regulated and enforced by the Information Commissioner's Office (ICO). Each individual has the right to raise a concern/complaint to the ICO if they have any concerns about how their personal information and/or privacy is treated. You can do this via the <u>ICO's website</u>, follow the links or have an online Live Chat.

Call the ICO helpline on 0303 123 1113

Email casework@ico.org.uk

Postal address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

12. How long we hold your data for

We will keep your information for as long as you remain a registered client and for a period of 12 months since last appointment/treatment. After this time, we may need to hold your personal data in order to meet our financial obligations or identify or

resolve issues or causes of action. If we are notified of a customer being deceased, we delete the details on notification.

If you have asked us to remove or delete your details from our database or marketing list, rather than deleting this entirely, we will retain just enough information to add you to our 'suppression list'. Suppression allows us to ensure that we do not send marketing when you've asked us not to, and ensures that you are not inadvertently put back on our marketing database in the future.

13. Links to third-party websites

Our website contains links to other websites belonging to third parties which are not covered by this privacy policy. If you do go through to a third-party website, please make sure that you read the privacy policy for that website.

14. Updates to this policy

We may update this policy at any time without notice. We will tell you that we have updated the policy by emailing you at the email address you have provided to us and/or by posting an announcement on the website. By continuing to use the website after we have emailed you or posted a notice informing you of an update, you accept the changes to this Policy.

Privacy statement last updated 16th May 2018.

15. Contacting us

If you have any questions about privacy or wish to update your details or have them removed from our mailing list at any time, please contact us at:

Email: anne@annerobertsoxton.com

Phone: 0151 653 7979

Post: DP Enquiries, Anne Roberts Oxton Ltd, 80 Birch Road, Oxton, Prenton, CH43 5UE.