Privacy Notice

Grace Health and Beauty Ltd and Grace Enterprise Ltd

This privacy notice explains how Grace Health and Beauty Ltd and Grace Enterprise Ltd looks after personal information you give us or that we learn by having you as a client and the choices you make about marketing communications you agree we may send you. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

Topics:

- What information we collect about you
- How information about you will be used
- Marketing
- How long your information will be kept for
- Where your information is kept
- Access to your information and correction
- Cookies
- Other websites
- Changes to our privacy notice
- How to contact us

WHAT INFORMATION WE COLLECT ABOUT YOU

We collect information about you when you book an appointment for a treatment, visit the clinic for a treatment or buy a product, whether contact is online, on paper, by email or over the phone.

The information you give us may include your name, address, date of birth, email address, phone numbers, relevant history which may suggest that a treatment should not go ahead or certain products should not be used (e.g. allergies, pregnancy, skin conditions) payment and transaction information and IP address.

For clients under the age of 16, we will only keep and use their personal information with the consent of a parent, carer or guardian.

HOW INFORMATION ABOUT YOU WILL BE USED

In law, we are allowed to use personal information, including sharing it outside the clinic, only if we have a proper reason to do so, for example:

- To fulfil a contract with you i.e. to provide the treatment you have requested and to communicate with you about your appointments.
- When it is in our legitimate interest i.e. there is a business or commercial reason to do so, unless this is outweighed by your rights or interests.
- When you consent to it: we will always ask for your consent to hold and use health and medical information.

We will therefore share your information with:

Providers of our IT systems: D. Hohl

Suppliers of our website: BEA Solutions Ltd.

We have rigorous data protection and security policies in place with all our suppliers.

We will not share your information with any other third party without your consent except to help prevent fraud, or if required to do so by law.

MARKETING

We would like to send you information about products and services which may be on interest to you. We will ask for your consent to receive marketing information. If you have consented to receiving marketing, you may opt out at a later date. You have the right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact us.

HOW LONG YOUR INFORMATION WILL BE KEPT FOR

We will keep your information in accordance with our Data Retention Policy as set out below.

WHERE YOUR INFORMATION IS KEPT

Your information is stored within the European Economic Area on our secure salon software system which is backed up weekly or held in secure electronic files electronically which can be accessed only by authorised company employees.

Paper records are held in a locked cabinet or in secure archive storage

ACCESS TO YOUR INFORMATION AND CORRECTION

You have the right to request a copy of the personal information that we hold about you. This will normally be free, unless we consider the request to be unfounded or excessive, in which case we may charge a fee to cover our administration costs.

If you would like a copy of some or all of your personal information, please contact Jennifer Grace by emailing jenni.grace@btconnect.com.

We want to make sure that your personal information is accurate and up-to-date. You may ask us to correct or remove information you think is inaccurate.

You have the right to object to our use of your personal information, or to ask us to delete, remove or stop using your personal information if there is no need for us to keep it.

E-Newsletters

We may, in the future, email newsletters to inform you about products, services and treatments provided by our clinic. You have the opportunity to unsubscribe from e-newsletters at any time.

E-newsletters may contain subscriber tracking facilities within the actual email, for example, whether emails were opened or forwarded, which links were clicked on within the email content, the times, dates and frequency of activity. We use this information to refine future email campaigns and provide you with more relevant content based around your activity.

COOKIES

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This is used to track visitor use of the website and to compile statistical reports on website activity. For further information visit www.aboutcookies.org or www.allaboutcookies.org.

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

OTHER WEBSITES

Our website may include links to other websites. This privacy notice only applies to this website so when you link to other websites you should read their own privacy notices.

CHANGES TO OUR PRIVACY NOTICE

We keep our privacy notice under regular review and we will place any update on this webpage or on the printed copy. This privacy notice was last updated on 25.09.2018.

HOW TO CONTACT US

Please contact us if you have any questions about our privacy notice or information we hold about you:

- By email at jenni.grace@btconnect.com
- Or write to us at Grace Medi-Spa, Clanfield Farm, 14 South Lane, Clanfield, Hants PO8 ORA

DATA RETENTION POLICY

This policy sets out what information Grace Health and Beauty Ltd and Grace Enterprise Ltd holds, how long we hold it for and when it will be deleted.

It also covers the procedure to follow regarding data requests.

- Information held by us
- How long is personal data held for?
- Where is personal data held?
- How is personal data deleted?
- Access to personal information, correction and deletion.

INFORMATION HELD BY US

We hold personal information about:

- Clients
- Former clients and prospective clients

We may also hold information about financial transactions relating to these e.g. treatments provided, products purchased.

HOW LONG IS PERSONAL DATA HELD FOR?

We aim not to hold personal data longer than necessary.

Unless requested by an individual, the following types of data will be held for the periods shown below, after which it will be securely deleted or destroyed.

TYPE OF INFORMATION	RETENTION PERIOD
Client general records	6 years (or 10 years for a medical treatment) after the relationship has become inactive (e.g. following the date of your last treatment)
Emails	One year from the end of the month in which they were received or sent unless a longer period is relevant

WHERE IS PERSONAL DATA HELD?

Personal data about clients and financial transactions are held on our secure salon software system which is backed up weekly or held in secure electronic files electronically which can be accessed only by authorised company employees.

Paper records are held in a locked cabinet or in a secure archive storage.

HOW IS PERSONAL DATA DELETED?

Personal data is permanently deleted in accordance with the retention periods listed above from:

- Salon software system
- Electronic files
- Emails
- Paper records, which are securely shredded.

ACCESS TO PERSONAL INFORMATION, CORRECTION AND DELETION

See our <u>privacy notice</u>

All requests for access to personal information will be handled by Jennifer Grace.

Responses to requests will be made within 30 days.

All information relating to the individual will be compiled into a report and collected from the relevant source, e.g. salon software system/paper records and/or emails.