

THE GENERAL DATA PROTECTION REGULATION (GDPR)

The General Data Protection Regulation (GDPR) is a new data regulation that came into place in May 2018, which aims to unify how consumers' personal data is protected across Europe. It also aims to create more transparency about how businesses store and use people's personal data. This is particularly interesting in the hair and beauty industry, as salons collect so much personal data from contact details, through to medication records and allergy testing.

WHO WE ARE?

Our company is Silk Hair Boutique Limited, trading as Silk Hair Boutique. We provide services relating to hairdressing in the UK. Our registered address is 225 London Road, Burgess Hill, West Sussex, RH15 9QU. Our Companies House number is 07536822.

HOW DO WE COLLECT INFORMATION ABOUT YOU?

We collect information about you when you book an appointment for a service or treatment, visit the salon for a service or treatment, buy a product or apply for a job, whether contact is online via our website contact form, on paper, by email, over the phone or in person.

WHAT TYPE OF INFORMATION IS COLLECTED FROM YOU?

The personal information we collect might include your name, address, email address, telephone number and other information that consent to provide on our paper and website contact form.

The following are the categories of personal data that we may hold, along with the legal basis for processing this data, who these personal details are shared with, time limits for erasure and the organisational/technical security measures that we take to ensure the security level appropriate to the risk:

1. Customer records - including referral letters and correspondence details:

- **Legal basis for processing:** For the purposes of legitimate interest and for the purposes of providing hairdressing services and the selling of hair products by Silk Hair Boutique.
- **Details shared with:** Silk Hair Boutique and its employees.
- **Time limits for erasure:** If we do not have any correspondence with you and you don't attend a salon appointment or visit the salon to purchase hair and beauty products for a period of 24 months, we will erase any and all data records we hold on you.
- **Security measures by us:** Only registered Silk Hair Boutique staff have access to the complete customer records. All registered staff comply with GDPR standards, which ensure they respect customer confidentiality. Paper records are kept securely. Electronic data is password protected and employees can only access the information essential for their role. There is also a back-up system that means data can be restored. All anti-virus software and other software are kept up to date.

2. Customer records - including direct debit/ bank account payment details:

- **Legal basis for processing:** For the purposes of legitimate interest and for the purposes of providing hairdressing services and the selling of hair products by Silk Hair Boutique.
- **Details shared with:** The data subject's bank
- **Time limits for erasure:** Kept for tax purposes and future claims/information
- **Security measures by us:** Paper records are kept securely and are accessible by salon staff only. Electronic data is password protected and employees can only access the information essential for their role. There is also a back-up system that means data can be restored. All anti-virus software and other software are kept up to date.

3. Staff records - including bank details, NI number and other personal info:

- **Legal basis for processing:** Necessary for the performance of a contract with the data subject or to take steps to enter into a contract and where processing is necessary for carrying out obligations as an employee.
- **Details shared with:** Silk Hair Boutique and its employees.
- **Time limits for erasure:** Kept for tax purposes and future claims/information
- **Security measures by us:** Paper records are kept securely and are accessible by salon directors only. Electronic data is password protected and employees can only access the information essential for their role. There is also a back-up system that means data can be restored. All anti-virus software and other software are kept up to date.

4. People who email us to make enquiries:

- **Legal basis for processing:** Necessary for the purposes of legitimate interests pursued by Silk Hair Boutique or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject (Note that this condition is not available to processing carried out by public authorities in the performance of their tasks).
- **Details shared with:** Silk Hair Boutique and its employees.
- **Time limits for erasure:** If we do not have any correspondence with you and you don't attend a salon appointment or visit the salon to purchase hair and beauty products for a period of 24 months, we will erase any and all data records we hold on you.
- **Security measures by us:** If paper records of emails are made they are not kept and are destroyed by shredding. Electronic data is password protected and employees can only access the information essential for their role. There is also a back-up system that means data can be restored. All anti-virus software and other software are kept up to date. We will monitor any emails sent to us, including file attachments for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law. We will report to the relevant authorities any content that is in breach of the law. We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with protocol requirements. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

5. People who make a complaint to us:

- **Legal basis for processing:** Necessary for the purposes of legitimate interests pursued by Silk Hair Boutique or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject (Note that this condition is not available to processing carried out by public authorities in the performance of their tasks).
- **Details shared with:** Silk Hair Boutique and its employees.
- **Time limits for erasure:** 2 years after the complaint is closed.
- **Security measures by us:** Paper records are kept securely. Electronic data is password protected. There is also a back-up system that means data can be restored. All anti-virus software and other software are kept up to date.

HOW IS YOUR INFORMATION USED?

We may use your information to:

- carry out our obligations arising from any contracts or agreements entered into by you and Silk Hair Boutique Limited;
- seek your feedback on the services we provide;
- notify you of relevant changes to our services;
- send you communications which you have requested and that may be of interest to you for legitimate business purposes;
- process an employment application.

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations. Silk Hair Boutique Ltd. will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with Silk Hair Boutique.

WHO HAS ACCESS TO YOUR INFORMATION?

- We will not sell or rent your information to third parties.
- We will not share your information with third parties for marketing purposes.

Third Party Service Providers working on our behalf:

- We may pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf.

However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties beyond the Silk Hair Boutique Limited network for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

WHAT ARE YOUR CHOICES?

You have a choice about whether or not you wish to receive information from us. If you would like to receive direct marketing communications from us about Silk Hair Boutique Ltd. products and services, then you can select your choices by ticking the relevant boxes on our website contact form on which we collect your information. Alternatively, you can select your marketing preferences when you complete our [Client Information Form](#) that can be downloaded from our website or picked up from the salon.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted. You can change your marketing preferences at any time by contacting us by email at info@silkhairboutique.co.uk or telephone on 01444 450243. Alternatively, you can adjust your marketing preferences by completing a new Client Info Form.

HOW CAN YOU ACCESS AND UPDATE YOUR INFORMATION?

The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or any of the other information we hold is inaccurate or out of date, please notify us via our website contact form or write to us at: 9 Commercial Square, Haywards Heath, West Sussex, RH16 1DW. Alternatively, you can telephone us on 01444 450243 or complete a new Client Information Form.

You have the right to ask for a copy of the information Silk Hair Boutique Ltd. holds about you. Should you wish to do this then please write to us at: 9 Commercial Square, Haywards Heath, West Sussex, RH16 1DW. Alternatively, you can telephone the salon on 01444 450243 or email us at info@silkhairboutique.co.uk.

WHAT SECURITY PRECAUTIONS ARE IN PLACE TO PROTECT THE LOSS, MISUSE OR ALTERATION OF YOUR INFORMATION?

When you give us personal information we take steps to ensure that it's treated securely. Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure.

As a result, while we take great care to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

DO WE USE COOKIES?

Like many other websites, the Silk Hair Boutique website may use cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. While cookies collect statistical data about your browsing actions and patterns, they do not identify you as an individual. This helps us to improve our website and deliver a better more personalised web user experience.

It is possible to switch off cookies by adjusting the settings of your browser preferences. For more information on how to switch off cookies visit www.aboutcookies.org or www.allaboutcookies.org. Turning cookies off may result in a loss of functionality when using our website.

WHAT ABOUT LINKS TO OTHER WEBSITES?

Our website may contain links to other websites run by other organisations. This privacy notice applies only to the Silk Hair Boutique Ltd. website, so we encourage you to read the privacy statements on the other websites you visit. Silk Hair Boutique Ltd. cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third-party website, Silk Hair Boutique Ltd. cannot be held responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the privacy policy of that website.

WHAT IF YOU ARE 16 YEARS OLD OR YOUNGER?

Silk Hair Boutique Ltd. is dedicated to protecting the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

WHAT ABOUT TRANSFERRING INFORMATION OUTSIDE EU?

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union ('EU'). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy. Currently our servers are located within the European Union and the United States (covered under the EU-U.S Privacy Shield Framework).

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

As you are likely to be aware the United Kingdom has voted to leave the EU as part of what has become known as 'Brexit'. It is scheduled to depart at 11pm UK time on Friday 29 March, 2019. Any changes to the data protection regulations that occur, if any, when the United Kingdom leaves the EU, will be addressed at that time.

DO YOU HAVE ANY QUESTIONS?

If you have a question, of any type, about the Silk Hair Boutique Ltd. Privacy Notice/Policy or the use to which we put information we gather, please contact us via our website contact form or write to us at: 9 Commercial Square, Haywards Heath, West Sussex, RH16 1DW. Alternatively, you can telephone the salon on 01444 450243 or email us at info@silkhairboutique.co.uk.

We welcome your views about the website and our privacy policy. You can contact us with any queries, complaints or comments using any of the methods above.

CAN WE HAVE YOUR CONSENT PLEASE?

Under the new GDPR regulations we are required to obtain consent to collect, hold and use your personal information. This must be on an opt-in basis and we cannot assume consent.

Therefore, if you are still in agreement that we can process your personal data in line with the procedures outlined above, then please give us consent by signing the following declaration:

I ACKNOWLEDGE RECEIPT OF THE ABOVE **PRIVACY NOTICE** IN RELATION TO GDPR AND HEREBY ACKNOWLEDGE THAT I HAVE READ, UNDERSTOOD AND GIVE MY CONSENT TO THE USE OF MY PERSONAL DATA AS STATED:

Name Signed Date

For more information regarding GDPR please visit our website at www.silkhairboutique.co.uk

Review of these policies:

Silk Hair Boutique Ltd. keep this Privacy Notice/Policy under regular review. This Policy was last updated on 25th May 2018.

THE DIRECTORS
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9 Commercial Square
Haywards Heath
West Sussex
RH16 1DW

Tel: [01444 450243](tel:01444450243)
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