

Introduction:

This document concerns your personal data that is not already in the public domain and covers legislation from the Data Protection Act and the General Data Protection Regulations (GDPR) which came into effect on May 25th, 2018.

The goal of GDPR is to protect user's personally identifying information and hold businesses to a higher standard when it comes to how they collect, store and use this data. The GDPR regulates how individuals and organizations may obtain, use, store and eliminate personal data.

We value your privacy and want to be clear and transparent about the data we collect and process.

Etica Beauty and Laser Clinic is committed to safeguarding the privacy of its clients in accordance with the General Data Protection Regulations 2018.

This privacy policy applies to all cases in which Etica Beauty and Laser clinic is acting as a data controller responsible for the processing and safeguarding of personal data of its clients.

Who we Are:

The information provided in this section clearly defines who 'we' are and who is responsible for managing your personal data.

Etica Beauty and Laser Clinic is a laser clinic within Etica Hair, Beauty and Laser Clinic which specializes in laser hair removal.

Physical address: 245 Field End Road, Eastcote, Ruislip, HA4 9NJ

Contact Methods:

By post to:

Etica Hair, Beauty and Laser Clinic, 245 Field End Road, Eastcote, Ruislip, HA4 9NJ

By telephone:

020 8061 9099

Data Protection Officer

Our Data Protection Officer/data controller is Nazan Damani and her contact details are as above.

Client Information:

Personal information is defined as data relating to an identified or identifiable individual, meaning information that could be used to identify an individual. We use your personal information only to the extent required to carry out our services to you. Clients have a right to expect that identifiable information about them provided during the course of their treatments will not be shared with other people without their knowledge.

Data Collection:

Personal data which is collected should be adequate, relevant but not excessive for the purpose for which it is disclosed. The data will be accurate and kept up to date.

We will collect direct information, provided by you, the client, via a consultation form at the initial appointment.

The types of personal data we will collect are your name, address, telephone number (mobile and/or land line), date of birth, gender, doctor's name and address and occupation.

Use of Your Personal Data:

It is required that any use of your personal data will be lawful and fair, and initiation of data transfer from you to Etica Laser Clinic should be easy to understand and be transparent as to which data is being processed and how it will be used.

We process your personal data for the following purposes:

- to register you as a new client.
- to process and deliver our services to you.
- to manage our relationship with you (e.g. Notifying you about changes to our terms or privacy policy or to keep our records updated).
- to enable us to comply with our legal and regulatory obligations.

Lawful Basis for Processing Your Personal Data:

For the purposes of the legitimate interests pursued by the data controller –legitimate interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you and your rights before we process your personal data for our legitimate interests. We do not use your personal data

for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

For the performance of a contract – means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation – means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Use of Your Health/Medical Data:

In the light of the service, we provide to you, it will be necessary for us to use information about your health (such as medical conditions, medication history, history of beauty/aesthetic treatments undertaken and lifestyle - exercise levels, alcohol consumption and smoking status). This information is a special category of personal data which requires us to have an additional lawful basis for using this information. Where we use information about your health for the purpose of providing our services to you (or in preparation for us to provide services to you) the additional lawful basis on which we shall rely will be that such use is necessary in order for us to provide you with healthcare or treatment.

Personal health information is collected and processed to provide care and the optimum treatment levels to our clients and will not be used for any other purposes without their knowledge or permission.

We do not conduct direct marketing or third-party marketing in which case consent would be required.

Change of Purpose:

We will only use your personal data for the purposes for which we collected it, unless we consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosure of Your Personal Data:

While your rights to privacy and control of your data are important, they are not absolute. Occasions arise where confidentiality not only can be breached but there may be ethical or legal requirements to do so. We will only disclose your information to other parties in the following limited circumstances:

- where we are legally obliged to do so e.g.. To law enforcement and regulatory authorities.
- where there is a duty to disclose in the public interest.
- where disclosure is necessary to protect our interest e.g.. to prevent crime and fraud.
- where you give us permission to do so by providing written consent.

International Transfers:

We do not transfer your personal data outside the European Economic Area (EEA).

Data Security:

We have put in place appropriate physical and human security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, access to your personal data is limited to one person only (Nazan Damani).

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach we are legally required to do so.

Data Retention:

We will only retain your personal data for as long as is necessary to fulfill the purposes we collected it for.

Records will be kept for 2 years after the last details have been added. Records that have become time expired will be disposed of in a secure manner.

Your Legal Rights:

At any point, whilst Etica Beauty and Laser Clinic is in possession of and processing your personal data, you have the following rights as dictated by EU Laws and Regulations:

- a) Right of access – you have the right to request a copy of the information that we hold about you.
- b) Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- c) Right to erasure – in certain circumstances you can ask for the data we hold about you to be erased from our records.

- d) Right to restriction of processing – where certain condition applies to have a right to restrict the processing.
- e) Right of portability – you have the right to have the data we hold about you transferred to another organization.
- f) Right to object – you have the right to object to certain types of processing such as direct marketing.
- g) Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects automated processing and profiling.

You will not have to pay a fee to access your personal data (or exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

We will try to respond to all legitimate requests within one month.

Through agreeing to this privacy notice you are consenting to Etica Beauty and Laser Clinic processing your personal data for the purposes outlined. You can withdraw consent at any time by writing to or phoning the DPO detailed in this document.

Complaints:

In the event that you wish to make a complaint about how your personal data is being processed, you have a legal right to complain, ideally in the first instance to Etica Beauty and Laser Clinic. If you do not get a response within 30 days of your correspondence, you can initiate a complaint to the Information Commissioners Office (ICO).

ICO address: Wycliffe house, Water Lane, Wilmslow SK9 5AF

ICO Tel. No.: 03031231113