

Privacy Policy

KEY PRINCIPLES

Your personal data is important. So important that there are a range of laws in place to safeguard it (the most important of which is the General Data Protection Regulation or “GDPR”). We are committed to doing our part to protect your personal data and comply with those laws.

In practice, this means that all personal data which we hold about you will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

This Privacy Policy is broken down into a number of layers to allow you to more easily find out more about how we use your personal data and the steps we take to protect it.

Purpose of this Privacy Policy

This Privacy Policy sets out how La Belle collects and processes your personal data as a customer. This principally relates to your use of our Site, whether you are using them to sign up to our newsletter, purchase a product or service, take part in a competition, or otherwise.

By visiting www.labellehairstalon.co.uk and our associated La Belle Hair Salon domains (our “**Site**”), and in particular by submitting your personal data to us, you are accepting and consenting to the practices described in this Privacy Policy. This Privacy Policy applies whether you are visiting our Site through an internet browser or through an La Belle Hair Salon “**App**” on your device (an “**App**”).

It is important that you read this Privacy Policy together with any other privacy policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

Who we are

We are La Belle Hair Salon Limited (collectively referred to as “La Belle Hair Salon”, “**we**”, “**us**” or “**our**” in this Privacy Policy). We are registered in England & Wales under registration number **08734332**. Our registered address is 2 Castle Business Village Station Road Hampton Middlesex TW12 2BX. Our VAT number is GB187849831.

Contact details

We welcome questions and comments regarding this Privacy Policy or our use of your data. If you would like to contact us please use the details below or any relevant links provided on our Site / App. Email address: info@labellehairstalon.co.uk

Privacy complaints procedure

You always have the right to make a complaint to the Information Commissioner's Office ("ICO") if you think your data is being misused. The ICO is the UK's supervisory authority for data protection issues (www.ico.org.uk).

We always appreciate the chance to try to deal with any data protection concerns before they are referred to the ICO so, if you are happy to do so, please do not hesitate to contact us using the details above so that we can try to help you out in the first instance.

Changes to this Privacy Policy

This Privacy Policy was last updated on 24th May 2018.

Any changes we may make to our Privacy Policy in the future will be posted on this page. We recommend that you check this page from time to time to take notice of any changes we make, as they are binding on you if you provide us with information after such a change has been made.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using the details set out in the "Contact Details" section above.

Informing us of changes to your data

It is important that the personal data we hold about you is accurate and current. As such you can use social media, telephone, email or in salon communication to amend the number of the details which we hold about you.

Third-party links

Our Site / App may contain links to and from third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third-parties to collect or share data about you. Please check the relevant third-party privacy policies before you submit any personal data to them. For example, Facebook, Instagram or Twitter etc

The Data We Collect About You

Personal data" means any information about an individual from which that person can be identified. It does not include data where the identity of the person concerned has been removed (which is called "**Anonymised Data**").

We may collect, use, store and transfer different kinds of personal data about you. This can be broken down into the following categories:

- **Identity Data** includes your name, username or similar identifier, marital status, title, date of birth and gender (this will primarily be text based, but could also include audio, photos, videos and other forms of media).
- **Contact Data** includes address, email address and telephone numbers.
- **Financial Data** which we do not collect nor store

- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us. Not payment details will ever be stored.
- **Technical Data** time zone setting and location and other technology on the devices you use to access our Site / App.
- **Profile Data** includes your usernames on social media, preferences, reviews, feedback and survey responses.
- **Usage Data** includes information about how you use our Site / App, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing communications from us and your communication preferences.

We also collect, use and share “**Aggregated Data**”. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** reveal your identity. For example, we may aggregate our users’ Usage Data to calculate the percentage of those users accessing a specific Site / App feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not collect any “**Special Category Data**” about you. Special Category Data includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, genetic or biometric data. Nor do we collect any information about criminal convictions and offences although we will note any medical conditions which you ask us to be noted of and any allergies relating to products we may use in salon i.e hair colour

How We Collect Your Data

You may give us personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes:

- **Information that you provide by filling in forms on our Site / App:** This includes information provided:
 - ♣ at the time of registering to use our Site / App;
 - ♣ when subscribing to a newsletter;
 - ♣ through a contact form (whether on our Site / App or by any other means);
 - ♣ when posting material such as ratings and reviews;
 - ♣ when requesting further services; or
 - ♣ Commenting/messaging on social media or email;
- **Social Media:** Information that you provide to us on our Social Media pages, such as Facebook, Twitter, Pinterest, Snapchat, Instagram and LinkedIn;
- **App details:** Information that you provide when you download or otherwise register on the App, use the App or share data via any social media functions on the App (which may include the phone number of the device used to use the App, your username and password on the App and other App registration information);

- **Competition details:** Information that you provide when you enter one of our competitions or participate in one of our promotions;
- **Troubleshooting details:** Information that you provide when you report a problem with our Site / App;
- **Wi-Fi details:** Information that you provide when accessing Wi-Fi services in our salon;
- **Survey details:** Information that you provide through surveys or when asked to give your opinions about our services and products;
- **Contact details:** Information that you provide when contacting our Customer Services Team or otherwise corresponding with us; and/or
- **Transaction details:** Details of transactions which you carry out in salon or online

Third parties or publicly available sources

We may receive Anonymised Data and/or Aggregated Data from various third-parties and public sources such as those set out below:

- data from analytics providers, advertising networks (such as Google AdWords / Google Shopping) and search information providers (all of which may be based outside the EU); and
- contact, Financial and Transaction Data from providers of technical, payment and delivery services (which may be based outside the EU).

DISCLOSURES OF YOUR PERSONAL DATA

First and foremost, you can rest assured that your personal data will not be shared with third-parties unnecessarily. We may disclose your personal data for the purposes set out in this Privacy Policy:

- if the possibility of such disclosure is otherwise stated in this Privacy Policy, our Terms of Use, our Terms and Conditions of Sale or otherwise when the personal data is collected from you;
- in particular, to the specific third-parties described in the tables in Section 4 (How we use your personal data – General Website) and Section 5 (How we use your personal data – Special Purposes)
- to service providers acting as processors or joint controllers who provide us with IT and system administration services;
- to professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide us with consultancy, banking, legal, insurance and accounting services;
- to HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or to protect our rights, property, or safety, or the rights, property or safety of our customers, or others. This includes exchanging information with: (a) the police or

other investigatory or law enforcement authorities; and (b) companies and organisations involved in fraud protection and credit risk reduction; and/or

We require all third-parties to respect the security of your personal data and to treat it in accordance with the law. Unless specifically stated in this Privacy Policy, we do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. We typically retain this information for a further six to twelve months to ensure that no relevant claim has been made within that six year period before we dispose of it but no card details are ever stored.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out above, please contact us using the details set out in the “Contact Details” section in Section 1 (Overview of this policy and who we are). A summary of the rights you have is set out below:

- **Opting-out of Marketing:** You can ask us to stop sending you marketing communications at any time by: (a) visiting our website and completing a contact form (b) by using the “unsubscribe” link at the bottom of any marketing emails which we send to you; or (c) by contacting us at any time using the details set out in the “Contact Details” or in salon section Section 1 (Overview of this policy and who we are).
- **Data Subject Access Requests:** You have the right to request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Correction:** You have the right to request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Erasure:** You have the right to request we erase your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Please note, however, that we may not always be able to comply with your

request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Processing Objection:** You have the right to object to us processing your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Processing Restriction:** You have the right to request we restrict the processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Withdrawing consent:** You have the right to withdraw your consent to processing where we are relying on that consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You will not have to pay a fee to access your personal data (or to 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 to 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 may also contact you to ask you for further information in relation to your request to speed up our response

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.