

GDPR DATA PRIVACY NOTICE

This is privacy notice of Pallant Aesthetics Ltd.

We respect your privacy and are determined to protect your personal data. The purpose of this privacy notice is to inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from). We'll also tell you about your privacy rights and how the data protection law protects you.

What is the purpose of this privacy notice?

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you sign up for updates or fill out our 'Contact us' .

This website is not intended for children and we do not knowingly collect data relating to children.

You must read this privacy notice together with any other privacy notice 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 notice supplements the other notices and is not intended to override them.

Data controller

This privacy notice is issued on behalf of Pallant Aesthetics so when we mention "Pallant Aesthetics", "we", "us" or "our" in this privacy notice, we are referring to the relevant company Pallant Aesthetics Ltd responsible for processing your data. For all data matters contact Jo Mifsud (Data Representative) on hello@pallantaesthetics.co.uk

Pallant Aesthetics is the controller and responsible for this website.

Third-party links outside of our control

This website may include links to 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. We do not control these third-party websites and are not responsible for their privacy statements.





When you leave our website, we encourage you to read the privacy notice of every website you visit.

THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the Information Commissioners Office.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first and last name, marital status, title, date of birth, gender.
- **Contact Data** includes billing address, delivery address, email address, telephone numbers.
- **Special Categories of Personal Data** includes details about your race or ethnicity, religious beliefs, medical and health information.

If you fail to provide personal data

Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel the service you have with us but we will notify you if this is the case at the time.

HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect data from and about you directly. You may give us your identity data, contact data and personal data by filling in forms or by corresponding with us by post, phone, email or otherwise.

HOW WE USE YOUR PERSONAL DATA



We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **Performance of Contract** this 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.
- **Legitimate Interest** this means the interest of our business in conducting and managing our business to enable us to give you the best service and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting Jo Mifsud on hello@pallantaesthetics.co.uk
- **Comply with a legal or regulatory obligation** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally we do not rely on consent as a legal basis for processing clients personal data other than in relation to sending third party direct marketing communications to you via e-mail or text message. You have the right to withdraw consent to marketing at any time by contacting hello@pallantaesthetics.co.uk

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact hello@pallantaesthetics.co.uk if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.



Purpose/Activity for Clients	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To register you as a new client</p> <p>To manage our employees;</p> <p>To maintain our own accounts and records;</p> <p>To inform individuals of news and events;</p> <p>To ensure we can respond correctly to your individual needs;</p> <p>For financial invoicing purposes;</p> <p>To keep you updated with service provision and any changes in service.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Special Categories of Personal Data</p>	<p>(a) and (b):</p> <p>Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract</p> <p>Processing necessary for compliance with a legal obligation</p> <p>Processing necessary to protect the vital interests of a data subject or another person</p> <p>(c):</p> <p>Processing necessary to protect the vital interests of a data subject or another person</p> <p>Processing necessary for compliance with a legal obligation</p> <p>Processing necessary for reasons of preventative or occupational medicine, for assessing the working capacity of an employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of EU or Member State law or a contract with a health professional</p>



Purpose/Activity for Employees	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To register you as a new employee;</p> <p>Determining the terms on which you work for us;</p> <p>Checking your right to work in the UK;</p> <p>When making payments to you to also include any necessary tax and NI deductions;</p> <p>Providing the following benefits to you: Travel allowance;</p> <p>Liaising with your pension provider and making payments;</p> <p>Administration related to the contract of employment;</p> <p>Business management and work force planning, including accounting and auditing;</p> <p>Conducting and managing reviews of performance and determining performance requirements;</p> <p>Making decisions regarding remuneration, bonus, commission and compensation;</p> <p>Making decisions regarding promotions to include assessing qualifications for a particular role;</p> <p>Gathering evidence for a possible disciplinary or gathering evidence in respect of an informal complaint or grievance;</p> <p>Making decisions about your continued employment or</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Special Categories of Personal Data</p>	<p>(a) and (b):</p> <p>Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract</p> <p>Processing necessary for compliance with a legal obligation</p> <p>Processing necessary to protect the vital interests of a data subject or another person</p> <p>(c):</p> <p>Processing necessary to protect the vital interests of a data subject or another person</p> <p>Processing necessary for compliance with a legal obligation</p> <p>Processing necessary for reasons of preventative or occupational medicine, for assessing the working capacity of an employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of EU or Member State</p>



<p>engagement;</p> <p>Making arrangements for the termination of our working relationship;</p> <p>Education, training and development requirements;</p> <p>Dealing with legal disputes involving you or other employees, workers and contractors, including accidents at work;</p> <p>Managing sickness absence, ascertaining your fitness to work;</p> <p>Complying with health and safety obligations, completion of accident book and RIDDOR reporting;</p> <p>Prevention of fraud through CCTV monitoring;</p> <p>Monitoring use of our information and communication systems to ensure compliance with our internal procedures and prevention of security lapses and breach of data protection laws;</p> <p>Preventing malicious software distribution;</p> <p>Gathering data analytics to assess retention and attrition rates;</p> <p>Equal opportunities monitoring.</p>		<p>law or a contract with a health professional</p>
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Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookies policy.



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 Jo Mifsud on hello@pallantaesthetics.co.uk. 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.

WHO WE SHARE YOUR PERSONAL DATA WITH

We may have to share your personal data with the parties set out below:

External Third Parties Service

- Providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accountancy services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- We require all third parties to respect the security of your personal data and to treat it in accordance with the law. 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.

INTERNATIONAL TRANSFERS

Appletree does not transfer any data outside of the EEA (European Economic Area).

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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 where we are legally required to do so.

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.

Details of retention periods for different aspects of your personal data are available in our POLICY which you can request from us by emailing hello@pallantaesthetics.co.uk



In some circumstances you can ask us to delete your data: see **Your legal rights** below for further information.

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

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact hello@pallantaesthetics.co.uk

No fee required – with some exceptions

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 admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you



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.

Time limit to respond

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

CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

QUERIES, REQUESTS OR CONCERNS

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact Jo Mifusd on hello@pallantaesthetics.co.uk . If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.



