

# General Data Protection Regulation (GDPR)

## For Our Way hair & beauty LTD

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## Information audit for Our Way hair & beauty LTD

### WHAT PERSONAL DATA DO WE HOLD AND WHERE?

Type of personal data held	Where held eg salon software, paper	What you use the data for	Where you got the data from	Do you have consent?	Who you share it with (if anyone)
<b>CLIENT DATA:</b> Name Contact details (address, phone number, email) Client history eg colour, consultation records Allergy test records for hair colour Notes of physical conditions	Fresha Partner (online booking system) Wix.com (website) My device (phone) Paper (I am keeping them in a safe place, nobody else can't reach them).	I am using the data for keeping in touch with my clients about their next booking. I want to make sure that my client has a healthy hair/scalp and that is safe for my client to do any chemical service.	I have got the data from my client, because I want to get a chance to get to know my client the best I can. So, that I can get for my client the desired result.	Yes, I do have a consent from my client.	I am the only person who can see the data. I am not sharing it with nobody.

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<p><b>EMPLOYEE DATA:</b>  Contact details  (address, phone number, email)  Emergency contacts/next of kin  Medical information  CVs  Job applications  Training records  Disciplinary records  Appraisals / performance reviews  [list other employee data held]</p>	<p>I am working alone now. I don't have an employee.</p>	<p>I am working alone now. I don't have an employee.</p>	<p>I am working alone now. I don't have an employee.</p>	<p>I am working alone now. I don't have an employee.</p>	<p>I am working alone now. I don't have an employee.</p>
<p><b>FINANCIAL DATA:</b>  Suppliers  Invoices  Bank account details  Credit/debit card details  Payment history  [list other financial data held]</p>	<p>Salon software, emails, paper.</p>	<p>I am using it to keep in track with the products that I am buying of my suppliers.  I am using it to stay in touch with my suppliers.  I like to know where I am investing my money in my business.</p>	<p>I have got the data from my suppliers.</p>	<p>Yes, I do have a consent from my suppliers.</p>	<p>I am not sharing the data with nobody.</p>

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<b>MARKETING DATA:</b> Mailing lists (email, text, post) Loyalty scheme members Social media My business listings (Google My Business, Yell, Yelp, Bing- places for business), Pinterest.	Salon software, Wix.com, My client's contacts (my phone and PC).	I like to stay in touch with my clients (blast messages, special vouchers, confirming the appointments). I like to stay in touch with my business's suppliers.	I have got the data from my clients or my business suppliers.	Yes, I do have a consent from my clients or my business suppliers.	I am not sharing it with nobody.
<b>OTHER:</b>					

Date completed ...18<sup>th</sup> March, 2022.....

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# Sample privacy notice for NHF members

This privacy notice explains how the “Our Way hair & beauty 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
- Employment
- 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 service or treatment, visit the salon or barbershop for a service or treatment, buy a product or apply for a job, whether contact is online, on paper, by email or over the phone.

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

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 salon/ barbershop, only if we have a proper reason to do so, for example:

- To fulfil a contract with you is to provide the service or treatment you have requested and to communicate with you about your appointments
- When it is in our legitimate interest if 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.

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We will therefore share your information with:

- Providers of our salon / barbershop software system: Fresha Partner
- Suppliers of our website: Wix.com.

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

Some of the people working in our salon/barbershop are self-employed. Where software systems and reception facilities are shared, our self-employed colleagues will have access to some of your information. Because of my chosen options (LOW PERMISSION) in FRESHA, I am keeping it up to the minimum.

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 of interest to you. We will ask for your consent to receive marketing information.

If you have consented to receiving marketing, you may opt out later.

You have the right at any time to stop us from contacting you for marketing purposes or giving your information to third party suppliers of products or services. If you no longer wish to be contacted for marketing purposes, please contact the owner/ manager/ director: Mrs. Rasima Zderic.

## **SELF-EMPLOYMENT**

The information we collect about our self-employed people, the purposes it is used for and who it will be shared with is set out in our employment contracts and employee handbook.

## **HOW LONG YOUR INFORMATION WILL BE KEPT FOR**

Unless you request otherwise, we will keep your information to contact you no more than [three times a year - check your software set-up] for a maximum of 1 year from your last visit to the salon/barbershop.

After a year we will delete all your personal information, except for your name, relevant client history (eg allergy test records which we keep for 4 years) and financial transactions (which we are obliged to keep for 6 years).

Information about unsuccessful job applicants will be deleted after four months.

See our [data retention policy](#) for further information, including self-employed data.

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## WHERE YOUR INFORMATION IS KEPT

Your information is stored within the European Economic Area on secure servers provided by The Fresha Partner and Wix.com. Any payment transactions are encrypted. Sending information via the internet is not completely secure, although we will do our best to protect your information and prevent unauthorised access.

## 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 your personal information, please contact the owner/manager/director: Mrs. Rasima Zderic.

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 ask us 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.

## 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](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://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.

See our cookies policy here: [Https://www.ourwayhairbeauty.co.uk](https://www.ourwayhairbeauty.co.uk)

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## OTHER WEBSITES

Our website includes 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 updates on this webpage. This privacy notice was last updated on 18<sup>th</sup> March 2022.

## HOW TO CONTACT US

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

- By email: [ourwayhairbeauty25@gmail.com](mailto:ourwayhairbeauty25@gmail.com)
- Or write to us at: 25 Southgate, HD1 1QZ, Huddersfield, West Yorkshire, England.

You also have the right to complain to the Information Commissioner's Office. Find out on their website how to report a concern:

[www.ico.org.uk/concerns/handling](http://www.ico.org.uk/concerns/handling)

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## Template consent form - marketing messages

As a valued client of the “Our Way hair beauty LTD “we’d like to stay in touch with you!

We take your privacy seriously, and we will only use your personal information to manage appointments for the services or treatments we provide for you within the salon.

We would also like to contact you about little goodies such as [special offers, birthday treats, new products or loyalty scheme rewards.

If you consent to us contacting you for these purposes, please tick to say how you would like to hear from us:

- Email
- Phone
- Text message

You can opt out of marketing messages from us at any time. Contact Mrs. Rasima Zderic (00447831475061)

For a copy of our privacy notice, [click here](#) or visit [Https://www.ourwayhairbeauty.co.uk](https://www.ourwayhairbeauty.co.uk)

Signed .....

Date .....

Thank you!

## Template consent form - special category data (Allergy test records / beauty consultation forms)

At the “Our Way hair & beauty LTD” we take your privacy seriously.

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For the safety of our clients, we maintain records of any health or medical conditions which may indicate that a particular service or treatment should not go ahead (eg allergies, pregnancy, skin conditions) or a particular product should not be used (eg products containing nuts, fish oils etc).

These health records are not used for any other purpose.

Client records are held securely within our salon software system [or in a locked filing cabinet] and can only be seen by members of the salon team.

**Please tick the box below if you consent to us:**

- Maintaining such records while you are a client
- Holding such records for 4 years after your last visit, after which your records will be deleted

For a copy of our privacy notice, [click here](#) or visit the website: [ourwayhairbeauty.co.uk](http://ourwayhairbeauty.co.uk)- Mrs. Rasima Zderic.

For a copy of our policy on deleting personal information about clients, [click here](#) or visit the website: <https://www.ourwayhairbeauty.co.uk> - Mrs. Rasima Zderic.

Signed .....

Date .....

Thank you!

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## Template consent form - children under 16

At The “Our Way hair & beauty LTD” we take privacy seriously, especially when it concerns children or young people under the age of 16.

We will only use their personal information (name, address, phone number and date of birth\*) to manage appointments for the services or treatments we provide for them within the salon.

Their personal information is securely held on our salon software [or in a secure locked cabinet (if you use paper records)]. For a copy of our privacy notice, [click here or visit the website: Https://www.ourwayhairbeauty.co.uk - Mrs Rasima Zderic \(00447831475061\)](#)

We need the consent of a parent, guardian or carer (with parental responsibility) for us to hold personal information relating to a child under the age of 16.

**If you consent, please sign below:**

I ..... am

the parent, guardian or career with parental responsibility (delete as appropriate) of

..... (Name of child or young person under 16)

and I give permission for the salon / barbershop to hold personal data about the child or young person above.

Signed .....

Date .....

Thank you!

*\*Date of birth is required as some services or treatments cannot be provided to people under the age of 16 eg permanent hair colour.*

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## Template response to consent

At The “Our Way hair & beauty LTD” we want to manage the personal information we hold about you in a way you’re completely happy with. You have agreed to us collecting and holding certain information about you, so we thought you’d appreciate a quick summary of what you have consented to.

Please let us know if you have any questions or want to make changes.

Thank you for consenting to the following:

- Providing health information to ensure we know about any conditions such as allergies, skin conditions, pregnancy which indicate that services / treatments / products should not be used for you
- Allowing us to keep that information for 4 years
- Providing consent for us to hold information about a child or young person under 16
- Receiving messages about [special offers, birthday treats, new products or loyalty scheme rewards] by [post, email, phone, text message]

You can opt out of marketing messages from us at any time. Contact Mrs. Rasima Zderic (00447831475061)

For a copy of our privacy notice, [click here](#) or visit the website:  
[Https://www.ourwayhairbeauty.co.uk](https://www.ourwayhairbeauty.co.uk)

Signed .....Rasima Zderic.....  
2022.....

Date 18<sup>th</sup> March,

Thank you!

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## Data retention policy

This policy sets out what information the “Our Way hair & beauty 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
- Employees
- Job applicants

We also hold information about financial transactions relating to these eg services or treatments provided, products bought, payroll information.

### 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	12 months
Client health records	4 years
Financial transactions, invoices and supplier details	6 years
Employee records, contracts of employment, changes to terms and conditions, annual leave, training	While employment continues and up to 6 years after employment ends

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records	
Payroll and wage records including PAYE, income tax, national insurance, sick pay, redundancy payments	6 years from the financial year-end in which payments were made
Maternity records	3 years after the end of the tax year in which the maternity pay period ends
Job applications (unsuccessful)	4 months after notifying unsuccessful candidates
Emails	One year from the end of the month in which they were received or sent unless a longer period is relevant as above. Emails to and from ex-employees or contractors will be deleted within 2 weeks of them leaving unless these form part of the employment record - see above.

#### WHERE IS PERSONAL DATA HELD?

Personal data about clients, financial transactions and employees are held on our secure salon software system which is backed up every day or held in secure electronic files electronically which can be accessed only by owner/manager/ director.

Paper records are held in a locked cabinet or in 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 [privacy notice ourwayhairbeauty.co.uk](http://ourwayhairbeauty.co.uk) - Mrs. Rasima Zderic (00447831475061)

All requests for access to personal information will be handled by Rasima Zderic (Salon owner).

Responses to requests will be made within 30 days.

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All information relating to the individual will be compiled into a report and collected from:

- Salon software system
- Financial transactions
- Emails
- Other electronic records
- Paper records (where applicable)

Date completed ...18<sup>th</sup> March,2022.....

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## Website privacy notice

*This privacy notice should be easy to find on your website. Before publishing it, make sure it all applies to your website and delete any sections which aren't relevant, for example if you don't use Google Analytics.)*

We are committed to protecting your personal data. This privacy notice is to give you an overview of how your personal data is processed when using our website.

### **Cookies**

*A cookie is a small text file that is downloaded onto the computers and smartphones used by our website visitors. It can recognize your device and store information about your preferences or past actions while on our website.*

We use cookies on our website to help you get the best experience from our website. They help us see what pages you like and the kinds of information you are looking for.

Our website has been set up to ask your permission to store cookies on the device you use to access our website. The Help menu within your browser should tell you how to manage cookies. Useful information about cookies and how to control them can be found at [www.aboutcookies.org](http://www.aboutcookies.org)

Our website also uses cookies that do not require your consent. For example, cookies that are needed to transmit information or provide online services. This includes online forms and shopping baskets.

### **Your data**

Sending information via the internet is not completely secure. Although we will do our best to protect your information, we cannot guarantee the security of data transmitted to our site. Our database is encrypted, and we use security features to protect data from hackers and cyber attacks.

We will regularly review the personal data our website has stored (for example, names, addresses, contact details and payment details) and securely delete information we no longer need.

### **Other third-party services**

We use Google Analytics to collect visitor numbers and information about how people use our site.

You can opt out of being tracked by Google Analytics. Find out more: <http://tools.google.com/dlpage/gaoptout>.

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Third-party services used on our website, such as Google Maps and YouTube, may collect data from our website visitors such as IP addresses (these are numbers associated with individual computers and smartphones).

### **External links on our website**

This privacy notice does not apply to any external websites we link to from our website.

### **Your rights**

You have the right to:

- request access to your personal data.
- request correction of your personal data.
- request your personal data is deleted.
- object to the processing of your personal data.
- request restriction of processing your personal data.
- request transfer of your personal data.
- and withdraw consent to the processing of your personal data.

Please email us at [ourwayhairbeauty.co.uk](mailto:ourwayhairbeauty.co.uk) to make these requests.

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# TEMPLATE IMAGE CONSENT FORM - salon/barbershop clients, employees or independent contractors

We will always ask for your permission before taking any photos or videos of you.

If the image means you can be identified (for example, if it shows your face), we will also ask for your consent for the image to be used in print or online.

We will keep images for up to five years unless you ask us to delete them. After five years your images will be deleted from our records, and we will no longer use them. Please note that if you consent to images being shared online or on social media, they may continue to be used by other users who are not under our control.

## CONSENT

- I consent to the “Our Way hair & beauty LTD” taking photographs or videos of me.
- I consent to my image(s) being used on the “Our Way hair & beauty LTD” website, in printed or online materials, on social media or on YouTube.
- I understand that the “Our Way hair & beauty LTD” will own the copyright of the image(s) and no payment will be made for their use.
- I understand that any images used online or on social media may be shared by other users on sites which are not controlled by the “Our Way hair & beauty LTD”.
- I give permission for the “Our Way hair & beauty LTD” to securely keep this form for up to five years.
- I am aged 18 or over.

Name .....

Signature .....

Date .....

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For clients, employees or independent contractors under the age of 18, a parent or legal guardian must complete and sign this form.

**CONSENT**

I ..... (Parent or guardian’s name) give permission for image(s) of ..... (minor’s name) to be used as follows:

- I consent to Our Way hair & beauty LTD taking photographs or videos of ..... (minor’s name)
- I consent to his/her image(s) being used on the “Our Way hair & beauty LTD” website, in printed or online materials, on social media or on YouTube.
- I understand that the “Our Way hair & beauty LTD” will own the copyright of the image(s) and no payment will be made for their use.
- I understand that any images used online or on social media may be shared by other users on sites which are not controlled by the “Our Way hair & beauty LTD”.
- I give permission for the “Our Way hair beauty LTD” to securely keep this form for up to five years.

Name .....

Signature .....

Date .....

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# Procedure for personal data breaches

This procedure is to be followed if there is a breach of personal data. The person responsible for managing the process is the owner/manager/director ideally with a second person who would deal with breaches if that first person is absent: Mrs. Rasima Zderic (owner/manager/director).

All decisions on whether to notify the Information Commissioner's Office (ICO) or individuals affected will be counter-signed by salon owner].

This procedure covers:

- What is a personal data breach?
- What must be recorded?
- Assessing the likelihood and severity of the adverse consequences of the breach
- When do breaches have to be reported to the ICO?
- What must be reported to the ICO?
- How to report a breach to the ICO
- Telling individuals affected about a breach
- What are the consequences of failing to notify the ICO?

## WHAT IS A PERSONAL DATA BREACH?

A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to, personal data.

Examples include:

- access by an unauthorised third party
- deliberate or accidental action by a data controller the "Our Way hair & beauty LTD" or a data processor (third party supplier, who must inform you without undue delay as soon as they become aware of it)
- sending personal data to an incorrect recipient
- computer or data storage devices containing personal data being lost or stolen
- alteration of personal data without permission
- loss of availability of personal data (if data is made unavailable and this unavailability has a significant negative effect on individuals)

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## WHAT MUST BE RECORDED?

All breaches must be recorded, whether they need to be reported to the ICO. If you decide not to report a breach, you must be able to justify this decision and it must therefore be documented.

Record:

- The facts relating to the breach
- Its effects
- Remedial actions taken
- What caused the breach and how a recurrence could be prevented

## ASSESSING THE LIKELIHOOD AND SEVERITY OF THE NEGATIVE CONSEQUENCES OF THE BREACH

Use the template in Appendix A to help answer the following questions:

- What is the likelihood and severity of the resulting risk to people's rights and freedoms?
- What are the potential negative consequences to the individuals concerned?
- How serious and substantial are the consequences? Don't forget this can include emotional distress, as well as financial, physical or material damage.

If there is a high risk of negatively affecting individuals' rights and freedoms (scoring 6 or more points on the risk assessment template at Appendix 1), then it must be reported to the ICO. This includes personal data breaches notified to you by third party data processors.

You may also need to notify third parties such as the police, insurers, banks or credit card companies who could help to reduce the risk of financial loss to individuals.

## WHEN DO BREACHES HAVE TO BE REPORTED TO THE ICO?

Breaches which are likely to result in a high risk of negatively affecting individuals' rights and freedoms must be reported **no later than 72 hours** after you first become aware of it. If you take longer than this, the reasons for delay must be documented.

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## WHAT MUST BE REPORTED TO THE ICO?

A description of the nature of the personal data breach including:

- The categories and approximate number of individuals concerned, and the categories and approximate numbers of personal data records concerned (which may be the same number)
- The name and contact details of the person who can provide more information if required
- The likely consequences of the personal data breach
- The measures taken, or proposed to be taken, to deal with the personal data breach including measures taken to mitigate any possible negative effects

The information can be provided in phases if it is not all available within 72 hours, as long as this is still done without undue further delay, and you tell the ICO when to expect further information from you.

You must prioritise the investigation, give it adequate resources and deal with it urgently.

## HOW TO REPORT A BREACH TO THE ICO

The section of the ICO website on reporting breaches has not yet been updated for GDPR. However, the following contact details are provided:

Data breaches : Call 0303 123 1113

Open Monday to Friday between 9am and 5pm, closed after 1pm on Wednesdays for staff training.

## TELLING INDIVIDUALS AFFECTED ABOUT A BREACH

If the breach is likely to result in a high risk to the rights and freedoms of individuals (scoring 6 or more on the more points on the risk assessment template at Appendix 1), you must inform the individuals affected as soon as possible.

One of the main reasons for informing individuals is to help them take steps to protect themselves from the effects of a breach.

You need to tell individuals:

- The nature of the personal data breach
- The name and contact details of the person who can provide them with more information
- The measures taken or proposed to be taken to deal with the personal data breach and the measures taken to mitigate any possible adverse effects

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If you decide not to notify individuals, you still need to notify the ICO unless you can show that the breach is unlikely to result in risks to rights and freedoms. The ICO has the power to make you inform individuals if they consider there is a high risk. The decision-making process must be documented.

#### **WHAT ARE THE CONSEQUENCES OF FAILING TO NOTIFY THE ICO?**

A fine of up to 10 million euros or 2% of your turnover or a fine of up to 20 million euros or 4% of your turnover in the most severe cases.

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# Appendix A - risk assessment template for personal data breaches

## COMPLETING THE RISK ASSESSMENT TEMPLATE

### Step 1

Provide brief details of the personal data breach, when it happened, how it happened and who has been affected.

### Step 2

List all the possible adverse consequences of the data which has been lost, altered or access by an unauthorized person.

### Step 3

How likely are those adverse consequences to occur?

Low likelihood - 1-point

medium likelihood - 2 points

High likelihood - 3 points

### Step 4

How serious would those adverse consequences be if they did occur?

Low impact - 1-point

medium impact - 2 points

High impact - 3 points

### Step 5

Produce an overall score by multiplying the points in columns 2 and 3 eg if a negative consequence is unlikely (1 point) but if it happened the impact would be high (3 points), the overall score will be 3.

**Anything scoring 6 points or more must be reported to the ICO and to the individuals concerned.**

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What happened? When did it happen? How did it happen? Who has been affected?

List all the possible consequences of the data being lost, altered or accessed by an unauthorized person	How likely is it there will be negative consequences? 1, 2, 3 points	How severe would negative consequences be? 1, 2, 3 points	Combined
1			
2			
3			
4			
5			

Continue another sheet if necessary

*This document was provided by the NHBF.*



Form completed by .....

Date .....

*This document was provided by the NHBF.*

