

# Privacy and Cookie policy

## Emma Firth Beauty and Education

## Confidentiality Statement

This policy contains information confidential and proprietary to Emma Firth Beauty and Education. This document contains information that is confidential or otherwise protected from disclosure and shall not be disclosed without prior approval.

## Version History

The document owner is the Emma Firth.

Date	Current Version	Comment	Next review date	Author	Status
17/12/2020	1	Policy version1 created		KA	Approved

## Document history control

Date	Version	Comment	Author	Approver	Status
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## Contacts

Company	Contact
Emma Firth Beauty and Training	<a href="mailto:hello@emmafirthbeautyandeducation.co.uk">hello@emmafirthbeautyandeducation.co.uk</a>

## Definitions

The definition of the Data Controller, Data Processor, Data, Personal Data, Processing is in accordance with the Data Protection Act 2018 and The EU General Data Protection Regulation up to 31<sup>st</sup> December 2020, thereafter The UK GDPR.

**“Client(s)”** means the business or entity, an authorised person on behalf of the business ordering the Services from Us.

**Data Protection Act 2018** means the data protection laws in the UK, including amendments The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (effective on exit day) (“DPPEC”).

**“EPECR or Privacy and Electronic Communications Regulations 2003”** means the 2002 EU Directive 2002/58/EC concerning the processing of personal data and the protection of privacy in the electronic communications.

**“The EU GDPR”** means The General Data Protection Regulation (EU) 2016/679 ( GDPR) is a regulation in EU law on data protection and privacy for all individual citizens of the European Union (EU) and the European Economic Area (EEA). Where a UK business is providing service to an EEA Client a UK business will need to comply with the UK GDPR and the EU GDPR.

**“The UK GDPR”** means the Regulation (EU) 2016/679 as per the definition in the updated Data Protection Act 2018. Thereafter, from the 31<sup>st</sup> December 2020, data protection to be governed by the UK GDPR and Data Protection Act 2018. Where a UK business is providing service to a EEA Client a UK business will need to comply with the UK GDPR and the EU GDPR.

**“ICO”** means the information commissioner’s office as the UK’s supervisory authority of the member state up to 31<sup>st</sup> December 2020. Thereafter, the referred to as the Commissioner.

**“Service(s)”** means and includes any of the following provided by Us to the Client:-

- (a) General beauty therapy and treatment.
- (b) Beauty.
- (c) Facial.
- (d) Manicure.
- (e) Pedicure.
- (f) Waxing.
- (g) Back treatment.
- (h) Courses including education.

**“We, Us or Our”** means Emma Firth Beauty and Education.

## 1. Introduction

This privacy policy governs the use of the Emma Firth Beauty and Education, (“**Our,We,Us**”) as a sole trader, with the website (<https://www.emmafirthbeautyandeducation.co.uk>), and sets out the basis in the way We collect or provided by You any Personal Data, the way in which We process Your (“**You, Your**”) Personal Data. By using Our website or any associated mobile application(s) (Apps) You agree and accept the terms of this privacy policy in conjunction with the terms and conditions. If You do not agree with this then do not use Our Website or any associated mobile application(s).

## 2. The information We may hold about You

### 2.1 What Personal Data do we collect?

For most of the general beauty treatment and related training Services provided We may collect Personal Data as per the table in 2.2 below. .

### 2.2 Why do we collect this information?

We use the Personal Data for purposes listed below for Our business Client related to the Services:-

Subject	Role	Purpose and type of activities	Lawful basis for processing	Special Category purpose (DPA 2018)	Personal Data
General beauty therapy and treatment including, facial, manicure, pedicure,waxing or back treatment	(i) We collect or determines, Data Controller.	(i) To carry out booking or provisions of educational Services.	Performance of a contract	Previous medical /health condition	Surname, first name, address, postcode, phone number, email, IP address, previous (health) condition.
Courses including education	(i) We collect or determines, Data Controller.	(i) To carry out booking or provisions of educational Services.	Performance of a contract	Not applicable	Same as above excluding health.
Deal with regulatory or legal queries	Data Controller	To contact legal or regulatory authority under	Legal obligation	Not applicable	Same as above

		a legal obligation			
Website responses	Data Controller	To respond to enquiries with Our website or contact on social media.	Legitimate interest/ Performance of a contract	Not applicable	Same as above
Marketing (business)and advertising including online or mail.	Data Controller	To provide blogs, newsletters, email campaign, social media.	Consent (unless opted out)	Not applicable	Same as above
Reviews	Data Controller	For Customer to publish reviews.	Direct marketing/ Consent	Not applicable	Same as above

### 2.3 How is this information collected?

We may collect Your details from contact us from, direct emails enquiries, or any referee. Any website tracking information related to device specific, collecting information about e.g. web analytics etc if applicable.

### 2.4 Use of the information collected?

The Personal Data is used to contact You via email or other means about Our provision of general beauty treatment and related training Service(s) and to identify You when You engage with Us. Our partners who are instructed by Us on Our behalf in delivering any part of Service to You in 2.2 above. For marketing Our Services to You except where You have withdrawn or opted out to receive any marketing from Us.

Any third party which We use for Data Processing will only process for example the email, until such time either the Personal Data is deleted on exit of a contract or a right which is exercised e.g. right to erase or withdraw of consent.

## 3. Cookies and, web analytics traffic

A website or features provided by a platform may have number of small scripts running in the background to capture web traffic data or retain session information about You (e.g. location, services You viewed etc) to allow us gather then process the information or view patterns in relation to navigation as a visitor to Our Website these are cookies.

“**Session Cookie**” enable the website You are visiting to keep track of Your movement from page to page.

**“Performance Cookie”** collect information about e.g. performance of a website using Google Analytics.

**“Persistent Cookie”** means a data file capable of providing websites with user preferences, settings and information for future visits on a user(s) hard drive with expiry date or the user deletes this file.

**“Marketing Cookie”** means the collection of user preferences related to marketing and to display relevant adverts.

**The Cookies We use.**

Our Website may use the listed cookies below:-

Service	Company	Description
Google Analytics	Google	Web analytics online service which tracks and reports in relation to website visitors traffic.
Social media pixels (Linkedin, Twitter, Facebook, Instagram)	(a)Linkedin (b)Twitter (c)Facebook (d) Instagram	To gather and display using web site data analytics relating to web site visitor information and marketing campaigns.

Company	Cookie Name	Expiration Time	Cookies use
Facebook	datr, fr, lu	2 years from the creation time	Uses a unique identification to make sure that any advertising you see from us on Facebook, is relevant and personalized.
Twitter	personalization_id	2 years from the creation time	Profile identification used to share information.
Linkedin	__utma, utmv	2 years from the creation time	Uses a unique ID to make sure that any advertising you see from us on LinkedIn is relevant and personalised.
Instagram	www-claim-v2	Session	Gather user preferences for marketing and advertising.
Google Analytics	gtag.js, analytics.js, ga	2 years from the creation time	Identify the user, request rate
	UserSetting	Session	User's internet browser colour and location preferences

**Changing the Cookies settings**

You may disable or erase cookies on Your computer or mobile device from Your settings internet browser settings. If You are unfamiliar with this, We would recommend reading up how to do this for example if using the Google browser (see Google guide).

You may be able to disable some cookies on Our website under their browser settings and it may affect the way a web site operates. You can find further information about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org)

## 4. Third parties

We work with a few trusted third parties delivering any of the Services mentioned above in section 2, who sign up to or adopt similar level of privacy as Emma Firth Beauty and Education privacy policy concerning how they handle Personal Data.

Type	Company	Use for Emma Firth Beauty and Education
Social media pixels (Linkedin, Twitter, Facebook)	(a)Linkedin (b) Twitter (c)Facebook	Online social media in relation to lead generation with inMail, messaging, posts, marketing campaigns.
Email marketing	Mail Chimp	Online email marketing tool for marketing.
Web hosting	DP Marketing communications	Online hosting of website and domain Services.
Marketing	DP Marketing communications	Creation, publishing online, print marketing material or marketing campaigns or referrals.

## 5. Marketing

We may contact You from time to time and send You details of Services that We provide which may be of interest to You. We may share your information with other third parties to contact You about Services which may be of interest to You with inhouse marketing. Any external marketing lists used shall be subject to approved consents where applicable. If You do not wish to receive such requests in the future, please contact Us to withdraw.

## 6. Your rights

As a Customer You have several rights in relation to Personal Data some are listed below. Where applicable We will respond to the above requests within thirty (30) days or notify as to who should be responding.

### 6.1. Subject access requests

If You wish to submit a subject access request, on the information We may hold about You then please email [hello@emmafirthbeautyandeducation.co.uk](mailto:hello@emmafirthbeautyandeducation.co.uk) Where We are acting as the Data Controller of the Personal Data We will respond. However, where We are acting as the Data Processor or a third party, We will pass your request onto the relevant Data Controller to respond directly. There is no charge of this except where such request is excessive it may be chargeable.

### 6.2. Inaccurate Personal Data

Where We have collected or use the Personal Data and which you believe is incorrect the please contact Us with to amend the Personal Data.

### **6.3. Request to withdraw, erase and portability of Personal Data**

If You wish to submit a request in relation to withdrawing consent, erase or port Your Personal Data We hold on You then please contact Us.

The ICO guidelines provide that some rights may not apply right to object (excluded under contact, legitimate interest or public tasks), erase (excluded under legal obligation or public tasks), portability (excluded under legal obligation, vital interest, public tasks, legitimate interests).

## **7. Retention of Personal Data**

We will retain records no longer than they are required or as up to 36 months if you withdraw/erase earlier then the data will be deleted exceptions for legal etc reasons held for longer. On exit of a Service for example website hosting with databases We will give the Customer the option to delete or receive a copy of the Personal Data collected.

## **8. Personal Data outside the EEA**

If any of website design or hosting services are provided outside of the EEA and Personal Data may be transferred by Us in order to provide You the Service above in 2.2. Where We transfer any Personal Data outside the UK into the EEA or outside of European Economic Area (EEA) this will be subject to either adequacy levels or model agreements to ensure that higher level of data privacy are applied.

## **9. Links to other websites**

Our website may contain other website links or content for interest. On entering the other website, We will have no control once You exit Our website. We exclude all responsibility and liability for Personal Data which you may submit. If you are not sure about entering Personal Data on these other websites, please review their privacy policy.

## **10. Disclosure of information**

We reserve the right to disclose collected Personal Data or any other supporting information in response of a court order, legal action, where consent is given, acquisition, regulator body where such disclosure is required by law or regulation.

## **11. Contacting Us**

If you have any questions in relation to this privacy and cookie policy, please contact the regarding data privacy at [hello@emmafirthbeautyandeducation.co.uk](mailto:hello@emmafirthbeautyandeducation.co.uk)