# **Privacy Policy**

## 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors, service users, individual clients and client personnel.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 In this policy, "we", "us" and "our" refer to Kalista Aesthetics. For more information about us, see Section 9.

#### 2. The personal data that we collect

- 2.1 In this Section 2 we have set out the general categories of personal data that we process and, in the case of personal data that we did not obtain directly from you, information about the source and specific categories of that data.
- 2.2 We may process data enabling us to get in touch with you ("contact data"). The contact data may include your name, email address, telephone number, postal address and/or social media account identifiers. The source of the contact data is you.
- 2.3 We may process information relating to transactions, including purchases of goods and/or services, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your name and your contact details. The source of the transaction data is you.
- 2.5 We may process information contained in or relating to any communication that you send to us or that we send to you ("**communication data**"). The communication data may include the communication content and metadata associated with the communication.

## 3. Purposes of processing and legal bases

- 3.1 In this Section 3, we have set out the purposes for which we may process personal data and the legal bases of the processing.
- 3.2 **Operations** We may process your personal data for the purposes of the processing and fulfilment of orders, providing our services, generating invoices, bills and other payment-related documentation. The legal basis for this processing is our legitimate interest, namely the proper administration of our website, services and business.
- 3.3 **Relationships and communications** We may process contact data, account data, transaction data and/or communication data for the purposes of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, SMS, and/or telephone, providing support services and complaint handling. The legal basis for this processing is our legitimate interest, namely communications with our website visitors, service users, individual clients and client personnel, the maintenance of relationships, and the proper administration of our website, services and business.
- 3.4 **Direct marketing** We may process contact data, account data and/or transaction data for the purposes of creating, targeting and sending direct marketing communications by email, SMS, and making contact by telephone for marketing-related purposes. The legal basis for this processing is our legitimate

interest, namely promoting our business and communicating marketing messages and offers to our website visitors and service users.

- 3.5 **Record keeping** We may process your personal data for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interest, namely ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this policy.
- 3.6 **Security** We may process your personal data for the purposes of security and the prevention of fraud and other criminal activity. The legal basis of this processing is our legitimate interest, namely the protection of our website, services and business, and the protection of others.
- 3.7 **Insurance and risk management** We may process your personal data where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice. The legal basis for this processing is our legitimate interest, namely the proper protection of our business against risks.
- 3.8 **Legal claims** We may process your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interest, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.9 **Legal compliance and vital interests** We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

## 4. Providing your personal data to others

- 4.1 Financial transactions relating to our website and services are handled by our payment services providers Card Saver. We will share transaction data with our payment services providers only to the extent necessary for the purpose of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices on the Card Saver website.
- 4.2 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

## 5. Retaining and deleting personal data

- 5.1 This Section 5 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

- 5.3 We will retain your personal data as follows:
  - (a) contact data will be retained for a minimum and maximum period of 8 years following the date of the most recent contact between you and us.
  - (b) transaction data will be retained for a minimum and maximum period of *8 years* following the date.
  - (c) communication data will be retained for a minimum and maximum period of 8 years following the date of the communication in question;
- 5.4 Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

#### 6. Your rights

- 6.1 In this Section 6, we have listed the rights that you have under data protection law.
- 6.2 Your principal rights under data protection law are available to view in the following link:

[https://edpb.europa.eu/our-work-tools/general-guidance/gdpr-guidelinesrecommendations-best-practices\_en and https://ico.org.uk/fororganisations/guide-to-data-protection/guide-to-the-general-data-protectionregulation-gdpr/individual-rights/].

6.3 You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

### 7. About cookies

- 7.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 7.2 We do not use cookies on our website.

#### 8. Amendments

- 8.1 We may update this policy from time to time by publishing a new version on our website.
- 8.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 8.3 We may notify you of significant changes to this policy by email.

## 9. Our details

- 9.1 This website is owned and operated by Webgloss Web Design and Hosting, Hampshire.
- 9.2 We are registered in England and Wales under registration number 12966364 and our registered office is at 60 Station Road, Alderholt, Hampshire, SP6 3RD.

- 9.3 Our principal place of business is at 60 Station Road, Alderholt, Hampshire, SP6 3RD.
- 9.4 You can contact us:
  - (a) by post, to the postal address given above;
  - (b) by email at: <u>kalista.aesthetics@gmail.com;</u>
  - (c) by telephone, on 01425 650497

## **10.** Representatives

10.1 Our representative within the UK with respect to our obligations under data protection law is Kim Lucas and you can contact our representative by using any of the contact details above.

## 11. Data protection officer

11.1 Our data protection officer's contact details are as above.