

# MACLEODBRADLEY

## HAIR SALON

### PRIVACY POLICY

#### Who are we and purpose of this Privacy Policy?

MacleodBradley Limited respect your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

MacleodBradley Limited is the controller for your personal data (collectively referred to as "MacleodBradley", "we", "us" or "our") in this Privacy Policy. We provide hairdressing services, hair treatments and products.

If you have any questions about this Privacy Policy including any requests to exercise your legal rights, please contact us using the details set out below:

MacleodBradley Limited  
39 Lapwing Lane  
West Didsbury  
Manchester  
M20 2NT  
Tel: 0161 448 8554  
Email: [info@macleodbradley.co.uk](mailto:info@macleodbradley.co.uk)

You have the right to make a complaint at any time to the Information Commission's Office (ICO) the UK supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

#### What does this Privacy Policy cover?

We at MacleodBradley take your personal data seriously. This policy:

- sets out the types of personal data that we collect about you;
- explains how and why we collect and use your personal data;
- explains how long we keep your personal data for;
- explains when, why and with who we will share your personal data;
- sets out the legal basis we have for using your personal data;
- explains the effect of refusing to provide the personal data requested;
- explains the different rights and choices you have when it comes to your personal data;
- explains how we may contact you and how you can contact us.

#### Changes to the Privacy Policy and your duty to inform us of changes

We may occasionally modify this Privacy Policy, with such variations becoming effective immediately upon posting to our website. Any changes we may make to our Privacy Policy in the future may be notified to you by email.

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

## **Third Party Links**

Our 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.

## **What data do we collect about you?**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data, where the identity has been removed (anonymous data).

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

- Identity Data includes first name, maiden name, last name, user name or similar identifier, title, date of birth and gender.
- Contact Data includes address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments from you and other details of services and products you have purchased from us.
- Technical Data includes internet protocol address, time zone setting and location, browser plug-in types and versions and other technology on the devices you use to access our website.
- Profile Data includes purchases made by you, your preferences, feedback and survey responses.
- Usage Date includes information about how you use our website, services and products.
- Marketing & Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

## **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract for the supply of services or products 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 (for example, to provide you with services or products). In this case, we may have to cancel a service or product but we will notify you if this is the case at the time.

## **How do we collect your personal data?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in client information forms or by communicating with us by phone, email or otherwise. This includes personal data you provide when you :
  - Apply for our services or products ;
  - Request marketing to be sent to you ;
  - Enter a competition, promotion or survey ;
  - Give us some feedback
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **Third Parties or Publicly Available Sources.** We may receive personal data about you from various third parties and public sources, such as analytics providers, advertising networks, search information providers and providers of technical, payment and delivery services.

## 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 :

- Where we need to perform the contract to supply services or products which we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

## Purposes for which we will use your personal data

We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so :

- To register you as a new client ; Identity, Contact.
- To process and deliver our services and products to you - Identity, Contact, Financial, Transaction, Marketing and Communications.
- To manage our relationship with you including notifying you about changes to our terms of privacy policy and asking you to leave a review or take a survey - Identity, Contact, Profile, Marketing and Communications.

- To enable you to partake in a prize draw, competition or complete a survey - Identity, Contact, Profile, Usage, Marketing and Communications.
- To administer and protect our business and our website - Identity, Contact, Technical.
- To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you - Identity, Contact, Profile, Usage, Marketing and Communications, Technical.
- To use data analytics to improve our website, products/services, marketing, customer relationships and experiences - Technical, Usage.
- To make suggestions and recommendations to you about services or products that may be of interest to you - Identity, Contact, Technical, Usage, Profile.

## How we will contact you?

We may contact you by phone, email or social media. If you prefer a particular contact means over another, please let us know.

## Marketing

- **Promotional Offers from us**  
We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you might want or need, or what may be of interest to you. This is how we decide which services/products and offers may be relevant for you.  
  
You will receive marketing communications from us if you have requested information from us or purchased services or goods from us or if you have provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.
- **Third Party Marketing**  
We will get your express opt-in consent before we share your personal data with any company outside of MacleodBradley.
- **Opting Out**  
You can ask us or third parties to stop sending you marketing messages at any time, by contacting us. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to you as a result of a service/product purchased, service/product experience or other transactions.

## Cookies

This is the Data Protection policy of MacleodBradley and covers the services offered by us at [www.macleodbradley.co.uk](http://www.macleodbradley.co.uk) ("the Website(s)").

The purpose of this statement is to inform users of the MacleodBradley website what information is collected about them when they visit this site, how this information is used, if it is disclosed and the ways in which we protect users' privacy.

By visiting this Website, you are accepting and consenting to the practices described in this privacy policy which may be amended from time to time. If you use this Website you are agreeing to be bound by this policy at any time.

### Using Cookies:

Cookies are small data files that websites generate and ask to store on your computer. Most websites use cookies in one form or another. They are typically used to:

- remember settings, so you don't have to keep re-entering them whenever you visit a new page
- remember information you give to a website, such as a list of products in your shopping basket
- measure how you use the website so we can make sure it meets your needs

### Measuring Website Usage:

When someone visits [www.macleodbradley.co.uk](http://www.macleodbradley.co.uk) we use a third party service, Google Analytics to collect standard internet log information and details about how visitors use this site. This provides us with important information that can enable the site to work better. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

The following cookies are used on [www.lovewithingtonbaths.com](http://www.lovewithingtonbaths.com):

`__UTM.GIF`, `__UTMA`, `__UTMB`, `__UTMC`, `__UTMT`, `__UTMZ`, `__GA`, `__GAT`, `__GID`, `COLLECT` - various cookies used by Google Analytics for visitor statistics

`PPSESSID` - for the purpose of preserving user session state across page requests

### Third Party Cookies:

We may sometimes embed widgets on a webpage such as media players or promotional links, for instance YouTube videos. If you go on to a web page that contains embedded content, you may be sent cookies from those websites.

Since we do not control these cookies, we suggest you check these third-party websites for information on their cookies and how to manage them.

### Cookie Settings:

You can set your web browser to restrict or to entirely block cookies, to configure cookie notification settings and/or to delete cookies already present on the browser or device. Information on how to do this should be provided in the web browser's help/reference section. Visitors who block cookies may be able to access the Website but may not be able to use some of the content, applications and services available on the site. To learn more about cookies and how to manage them, visit [www.AboutCookies.org](http://www.AboutCookies.org).

## 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.

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.

## Disclosures of your personal data

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

- External third parties such as processors who provide IT and system administration services, professional advisers acting as processors or joint controllers and HM Revenue and Customs, regulators or other authorities acting as processors or joint controllers.
- Specific third parties such as suppliers and sub-contractors.
- Third parties to whom we may choose to sell, transfer or merge parts of our business.

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

We do not transfer your personal data outside the 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, contactors 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.

## Data Retention

We will only retain your personal data for as long as necessary to fulfill 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 clients (including Contact, Identity, Financial and Transaction Data) for six years after they cease being clients for tax purposes.

## Your legal rights

Under certain circumstances, you have rights under Data Protection Laws in relation to your personal data. You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**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.

**Request erasure** of 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. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. 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.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) 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. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of 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.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on 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). We may also contact you to ask for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within 28 days. 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.

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