

Privacy Policy

Scandinavian Skincare Systems is committed to respecting your privacy and protecting your personal information

- We will be transparent about the information we are collecting and what we will do with it.
- We will use the information you give us for the purposes described in our Privacy Policy, which include providing you with services you have requested and enhancing your experience with us.
- We will also use the information to help us understand you better and so that we can give you relevant products, services and offers.
- If you tell us, you don't want to receive marketing messages we will stop sending them. We will, of course, continue to send essential information relating to a product or service that you have ordered.
- We will put in place measures to protect your information and keep it secure.
- We will respect your data protection rights and aim to give you control over your own information.

Our full Privacy Policy is detailed below to help you to understand better how we use your personal information. Here you will find more detail about the types of personal information we collect; how we collect it; what we may use it for; and who we may share it with.

You will also find some specific examples of why and how we use your personal information. If you have further questions please get in touch with us by writing to:

Scandinavian Skincare Systems, 56-58 High Street, Broadway, Worcestershire WR12 7DT, England.

Without prejudice to your rights under applicable laws, the above and the Privacy Policy are not contractual and do not form part of you using our services.

Full Privacy Policy

Controller of Personal Information

Any personal information processed by Scandinavian Skincare Systems in connection with this Privacy Policy is controlled by Scan Skin Sys Ltd, which is considered the 'data controller' of your personal information under European Union and UK data protection law.

Our address is 56-58 High Street, Broadway, Worcestershire WR12 7DT, England.

If any of the products or other services that we provide are undertaken by one of our independent third-party suppliers, then they will also separately be a 'data controller'. You can access the privacy policies of those providers from them directly.

What is personal information?

Personal information is the details which identify you, or could be used to identify you, such as your name and contact details, your products and / or services order history.

When does this policy apply?

This Privacy Policy applies to personal information about you that we collect, use and otherwise process regarding your relationship with us as a client or potential client, including when you order products with us or use our other services; use our websites; or contact members of our team.

Where we reference that others are data controllers in the sections 'Controller of Personal Information' and 'Who do we share your personal information with?' you should consult their privacy policies for further information.

Additional Terms and Conditions or policies may apply if you elect to take additional services from us such as using our Wi-Fi.

How can you keep your personal information secure?

We take great care to protect the personal information you provide to us. Here are some things you can do to keep your information secure.

Be aware of and protect yourself against Internet fraud and 'phishing'

There is an Internet fraud practice known as 'phishing' which is the illegal gathering of personal information by deception. Unsolicited emails are sent to individuals from lists illegally gathered by a third party, and recipients are asked to enter or reconfirm bank or password details into a 'cloned' or illegal copy website.

Please be aware of scam emails claiming to be from Scandinavian Skincare Systems.

When do we collect personal information about you?

We collect personal information about you whenever you use our services (whether these services are provided by us or by other third-party companies acting on our behalf), including when you order products and / or services from us, when you use our website or mobile applications, or interact with us via email or phone.

In addition, we may receive personal information about you from third party companies who have recommended our services to you.

What types of personal information do we collect and retain?

When you use our services, you will need to provide us with your personal details or the details of those individual(s) who will be using our services.

We collect the following categories of personal information:

- Information you provide to complete and manage the sale of a product, equipment or other service that you have requested from us.
- Information about your visiting arrangements to our premises.
- Information about the services we have provided to you in the past.
- Information about any online interactions.
- Information about your use of our websites.
- Information about your device and your location if you have been browsing on our web site, for example your IP address or unique device ID. (An IP address (i.e. Internet Protocol address) is a numeric code that can act as a unique identifier for your computer or other device – this can be turned off from your device).

What do we use your personal information for?

The main purposes for which we use your personal information are:

- To fulfil sales and services appropriately and effectively.
- To send product information, updates and additional related service communications to you.
- To keep track of you in advance of additional sales, or recommended products.
- To help keep you safe should you visit our premises and to meet certain legal and regulatory requirements which may apply to our public liability insurance.
- To provide services and products tailored to your requirements and to treat you in a more personal way.
- To carry out analysis and market research.
- To carry out marketing including online advertising and keep you informed of our products and services. To undertake targeted online advertising.
- To send you status updates and service communications.
- To improve our websites, products and services. For management and administrative purposes.

When will we send you marketing?

When we collect information directly from you we may ask you if you do not want to receive our marketing communications. Please be aware that we do sometimes send marketing communications that promote a third party's products and services (for example, those third-party products that we use as well as our own).

We may ask if you consent to receiving marketing communications from other members of our group of companies or from third parties. We will respect your choice as to what communications you wish to receive and how these are sent.

How can you change what marketing communications you receive and how you receive them?

If you decide you would no longer like to be sent marketing or other communications, you can change your mind at any time. The ways to stop being sent marketing or other communications are described below:

You can change your marketing preferences at any time by phoning or emailing us on w: +44 (0) 7711 086227; or emailing us at info@scandinavianskincare.com.

In addition, each marketing communication we send by email will also have the above contact details for you to unsubscribe should you wish, and which will allow you to stop you receiving further marketing emails. You may also stop any further text messages by replying with the word 'STOP'. We aim to action requests to stop being sent marketing communications within 10 working days of receiving those requests, but it is possible you will receive some marketing in the period prior to that change being made.

Please note that if you tell us that you do not wish to be sent further marketing communications, you will still receive service communications (as described above) which are necessary, for example, to confirm your order, or to provide you with an update on its status. If you ask us to stop sending marketing communications, please note we will retain your personal information for the purposes of indicating that you do not want to receive marketing communications.

What is our legal basis for using your personal information?

Scandinavian Skincare Systems will only process your personal information where we have a legal basis to do so. The legal basis will depend on the reason or reasons Scandinavian Skincare Systems collected and needs to use your information. Under EU and UK data protection laws in almost all cases the legal basis will be:

- Because we need to use your information so that we can process your order.
- Because it is in Scandinavian Skincare Systems' legitimate interests to use your personal information to operate and improve our business as a product and services provider.
- Because Scandinavian Skincare Systems needs to use your personal information to comply with a legal obligation.
- To protect the vital interests of you or another person.
- Because you have consented to Scandinavian Skincare Systems using your information for a particular purpose.

More information on each legal basis is provided below.

If processing of your data is subject to any other laws, then the basis of processing your data may be different to that set out above and may in those circumstances be based on your consent in all cases.

How long do we keep personal information?

We will keep your information for as long as we need it for the purpose it is being processed for. For example, where you book an appointment with us we will keep the information related to your booking, so we can fulfil the specific order arrangements you require and after that, we will keep the information for a period which enables us to handle or respond to any complaints, queries or concerns relating to the order. The information may also be retained so that we can continue to improve your experience with us and to ensure that you receive any further information.

We will actively review the information we hold and delete it securely, or in some cases anonymise it, when there is no longer a legal, business or customer need for it to be retained. If you stop interacting with us as a customer, we will remove or anonymise your information after 7 years.

Performance of a contract with you

It will be necessary for Scandinavian Skincare Systems to use your personal information to complete an order that you have made with us. For example, we will need to use information such as your contact details and payment information to provide you with the services or products you have requested and paid for.

Legitimate Interests:

As a commercial business Scandinavian Skincare Systems has a legitimate business interest to use the personal information we collect to offer an effective service and carry out our general day-to-day business.

Compliance with legal obligations:

There are situations where Scandinavian Skincare Systems is subject to a legal obligation and needs to use your personal information to comply with those obligations.

To protect the vital interest of you or another person:

There are situations where we may need to use your personal information to protect the vital interests of you or another person.

Consent:

Alternatively, we may collect and use your personal information where you have given your specific consent to us doing so. If the basis of our processing your data is consent to marketing, you can withdraw your consent to such processing at any time, including by email or by phoning us.

However, if you withdraw your full consent, in some circumstances, it may mean we will not be able to provide all or parts of the services and / or products you have requested from us.

Who do we share your personal information with?

Your personal information may be shared with the companies within our group, which includes Scandinavian Skincare Systems and Scandinavian Skincare Academy. For more details about our group please visit the web site of our sister company at www.scandinavianskincare.com. We share information with them, so they can assist us in providing services to you and to understand more about you. For example, if you have purchased products or training courses with one of the other companies in the group we may use this information to understand more about the sorts of services you are likely to be interested in.

You will only be sent marketing emails from other companies within our group where you have provided your consent to those companies.

We may also disclose your personal information to the following third parties for the purpose described here:

- Credit and charge card companies, credit reference agencies and anti-fraud screening service providers to process payments and (where necessary) to carry out fraud-screening.
- In response to a valid, legal request from Government and law enforcement agencies.
- Third party service providers we are using to provide services that involve data processing, for example, to carry out payment transactions, marketing initiatives or run customer surveys on our behalf. Third parties, such as law firms and law courts, to enforce or apply any agreement with you.
- Third parties, such as the police and regulatory authorities, to protect our rights, property, or the safety of our clients, staff and assets.
- We do not sell personal information to third parties, and we only allow third parties to send you marketing information where we have your consent to do so.

Requesting a copy of your personal information

Under the UK Data Protection Act 1998, you may request a copy of any personal data about you held by Scandinavian Skincare Systems. There is no fee for this request.

The request must be in writing and must contain the following:

- Your name and postal address.
- Details of your request.
- Any details which may help us locate the information which is the subject of your request, for example: appointment details and dates.

You must also provide:

- A photocopy of your passport or driving licence, so that we can verify your identity.

- Your signature and the date of the request.
- If you are applying on behalf of another person then signed authority from the individual is required.

Please send your request to:

Scandinavian Skincare Systems Ltd, 56-58 High Street
Broadway
Worcestershire WR12 7DT
England

What are your legal rights in relation to the personal information we hold about you?

Under data protection laws in the European Union and the UK, you have certain rights in relation to your personal information. Responses to exercise your rights will be provided within one month and generally there is no fee for making these requests. If your request is particularly complicated we may extend the deadline for responding to three months, but we will let you know if this is the case.

We will handle all requests in accordance with applicable law. However, depending on the right you wish to exercise, and the nature of the personal information involved, there may be legal reasons why we cannot grant your request. Further explanation of those rights and the exceptions to them are set out below.

Details of how to exercise your rights are set out in the section below "How can you exercise your legal rights and change how we use your data?"

Your rights include the following:

- You may request us to stop sending you marketing. To see how to change your permission to market please refer to "How can you change what marketing communications you receive and how you receive them?" which can be located in "When will we send you marketing?". If you do so we will no longer be able to send you marketing communications. However, if you subsequently order a product and / or service from us we will need to send you communications about the services you have booked to use. These communications will help you get the most from the services and products that we provide and may also contain options and other details about the services you will be using.
- You may request us to stop using your personal information where we are doing so under legitimate interests (see the section "What is our legal basis for using your personal information" for examples of when that applies) unless it is needed for dealing with legal claims or we have other compelling legitimate reasons that override your rights.
- You may request us to stop processing of your personal information for marketing purposes including analytics for the purposes of targeted marketing, including online advertising.
- You may access the personal information we hold on you.
- There are some limited exceptions to this right, such as information relating to others who have not consented to the disclosure of their information and

information which is legally privileged. Please see “Accessing your personal information” which can be located within "How can you exercise your legal rights and change how we use your data?" for more details.

- You may ask us to correct your personal information (the 'right of rectification') if that information is inaccurate. How to do this see section on “How can you change what marketing communications you receive and how you receive them?”
- You may ask for personal information which identifies you to be erased (or forgotten). To do this we will remove the information that identifies you from the data we hold in our active systems ('anonymise'). However, a separate and restricted copy of the identifying information will be kept for 7 years to meet the obligations we have to law enforcement, national authorities and legal proceedings.

Considerations:

- We may need to retain certain elements that relate to a contract between you and Scandinavian Skincare Systems because we need it for our own legal and auditing purposes (for more information on the basis on which we process your personal information see the section “What is our legal basis for using your personal information?”).
- A record of your request including the personal information you supplied will be retained in the application used to carry this out for 3 years.
- In some circumstances it may mean we will not be able to provide all or parts of the services you have requested from us in relation to previous products and / or services orders or retain any preferences you have previously shared with us.
- We cannot erase your personal information if you have either ordered and products or a services from us in the past 13 months or you hold a forward order for a product or service from us. For Legal reasons, we need to keep information linked to these orders. You may come back to us once this time period has passed and submit a request.
- We cannot erase your personal information if we have identified that you either have an open complaint with us or we hold a previous case for you within the past 6 years. We are required to retain this information in case there is a need to re-open the complaint.

How can you exercise your legal rights and change how we use your data?

If you wish to change how we use your personal information, please contact us at:

Scandinavian Skincare Systems, 56-58 High Street, Broadway, Worcestershire WR12 7DT, England

info@scandinavianskincare.com

w: +44 (0) 7711 086227

We will ask for some information to identify you, which will only be used to process your request. We will verify your identify via email before processing your request.

Accessing your personal information

If you wish to receive a copy of your information, you can make your request in writing and include the following information with your request:

- Your name and postal address
- Details of your request
- A photocopy of your passport or driving licence, so that we can verify your identity your signature and the date of the request
- If you are applying on behalf of another person then signed authority from the individual is required

Any details which may help us locate the information which is the subject of your request, for example:

- Products and / or services order details and dates

How will we inform you of changes to this Privacy Policy?

If we change this Privacy Policy, we will let you know about the changes by publishing the updated version on www.scandinavianskincare.com. We are committed to protecting and respecting your privacy and will continue to do so in any future changes we make to this Privacy Policy.

This Privacy Policy came into effect on **22 May 2018** replacing our previous Privacy Policy. This Privacy Policy applies to all information we process about you in connection with your relationship with us as a customer or potential customer.

Please write to us if you would like to find out more about any matters to do with this Privacy Policy.