**Privacy Policy**

**Glow The Tanning Studio Limited company number ………….**

Glow The Tanning Studio Limited is the controller for the personal information we process, unless otherwise stated.

**What we’ll tell you:**

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**1. How we collect personal information about you**

* We collect personal information about you:
* When you give it to us directly, for example, personal information that you give to us when you communicate with us by email, telephone or letter etc.
* When we obtain it indirectly, for example, your personal information may be shared with us by a third party.
* When it is available publicly. Your personal information may be available to us from external publicly available sources. For example, depending on your privacy settings for social media services.
* When you visit our premises, for example, where CCTV is used.
* When you visit our website or use our Wi-Fi services, we automatically collect the following types of personal information:
* Technical information, including a truncated and anonymised version of your internet protocol (IP) address used to connect your device to the internet, browser type and version, time zone setting, browser plug-in types and versions and operating systems and platforms.
* Information about your visit to the websites, including the uniform resource locator (URL) clickstream to, through and from the website (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, referral sources, page interaction information (such as scrolling and clicks) and methods used to browse away from the page.

We collect and use your information by using cookies on our website – please see our Cookie Policy for more information.

**2. What personal information we use**

We may collect, store and otherwise process the following kinds of personal information:

a) your name and contact details including postal address, telephone number, email address and emergency contact details and, where applicable;

b) your date of birth and gender;

c) your financial information, such as bank details and credit/ debit card details;

d) information about your computer/ mobile device and your visits to, and use of this website, for example, your IP address and geographical location and/ or any other personal information which we obtain as per section 1.

Special categories of data:

The EU General Data Protection Regulation (“GDPR”) recognises certain categories of personal information as sensitive and therefore requiring more protection, for example information about your health, ethnicity and religious beliefs.

In certain situations, Glow The Tanning Studio Limited may collect and/ or use these special categories of data for example, information on customer medical conditions, if they are required to use our services. We will only process these special categories of data if there is a valid reason and where the GDPR allows us to do so.

**3. How and why we use your personal information**

Your personal information, however it is provided to us, will be used for the purposes specified in this Notice. In particular, we may use your personal information:

a) to provide you with services, products or information that you have requested;

b) to communicate as necessary with you;

c) to provide further information about our work, services or activities (where necessary, only where you have provided your consent to receive such information);

d) to answer your questions/ requests and communicate with you in general;

e) to manage relationships with our partners and service providers;

f) to analyse and improve our work, services, activities, products or information (including our website), or for our internal records;

g) to keep our facilities safe and secure;

h) to run/ administer the activities of Glow The Tanning Studio Limited including our website, and ensure that content is presented in the most effective manner for you and for your device;

i) to audit and/ or administer our accounts;

j) to satisfy legal obligations which are binding on us, for example in relation to regulatory, government and/ or law enforcement bodies with whom we may work (for example, requirements relating to the payment of tax or anti-money laundering);

k) for the prevention of fraud or misuse of services;

l) for the establishment, defence and/ or enforcement of legal claims; and/or

m) to notify you about changes to our services.

**4. Lawful bases**

The GDPR requires us to rely on one or more lawful basis to use your personal information. We consider the grounds listed below to be relevant:

a) Where necessary so that we can comply with a legal obligation to which we are subject (for example, where we are obliged to share your personal information with regulatory bodies which govern our work and services).

b) Where necessary for the performance of a contract to which you are a party, or to take steps at your request prior to entering a contract.

c) Where there is a legitimate interest in us doing so.

d) Where the above reasons have not been satisfied and/ or you have provided your consent for us to use your personal information in a certain way.

The GDPR allows us to collect and process your personal information if it is reasonably necessary to achieve our or others’ legitimate interests (as long as that processing is fair, balanced and does not unduly impact your rights as an individual).

In broad terms, our “legitimate interests” means the interests of running of Glow The Tanning Studio Limited as a commercial entity.

When we process your personal information to achieve such legitimate interests, we consider and balance any potential impact on you (both positive and negative), and on your rights under data protection laws. We will not use your personal information for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

**5. Communications for marketing**

We may use your contact details to provide you with information about our work, services and/ or activities which we consider may be of interest to you.

Where we do this via email, SMS or telephone, we will not do so without your prior consent (unless allowed to do so via applicable law).

Where you have provided us with your consent previously but do not wish to be contacted by us about our work, services and/ or activities in the future, you can opt out of receiving communications from us at any time by clicking the “unsubscribe” link at the bottom of our emails/ texts. You can also change your preferences at any time by following the information provided within the communication or contacting us by the contact details below.

**6. How long we keep your personal information**

We will not retain personal information for longer than is necessary and it will only be held for the purposes for which it was obtained in line with our Policies and Procedures.

If you request to receive no further contact from us, we may keep some basic information about you on our suppression list in order to comply with your request and avoid sending you unwanted materials in the future.

**7. Will we share your personal information?**

We do not share, sell or rent your personal information to third parties for marketing purposes. However, in general we may disclose your personal information to selected third parties in order to achieve the purposes set out in this Notice.

These parties may include (but are not limited to):

a) local authorities and other public bodies;

b) establishments/ prospective employers (for example if a reference is sought);

c) suppliers and sub-contractors for the performance of any contract we enter into with them, for example IT service providers such as website hosts or cloud storage providers;

d) professional service providers such as accountants and lawyers;

e) parties assisting us with research to monitor the impact/ effectiveness of our work, events, services and activities;

f) the police;

g) regulatory bodies who govern our work, such as the Gambling Commission.

In particular, we reserve the right to disclose your personal information to third parties:

• in the event that we sell or buy any business or assets, in which case we will disclose your personal information to the (prospective) seller or buyer of such business or assets;

• if substantially all of our assets are acquired by a third party, personal information held by us may be one of the transferred assets;

• if we are under any legal or regulatory duty to do so; and/or

• to protect the rights, property or safety of Glow The Tanning Studio Limited, its personnel, users, visitors or others.

**8. Security/ storage of and access to your personal information**

Glow The Tanning Studio Limited is committed to keeping your personal information safe and secure and we have appropriate and proportionate security policies and organisational and technical measures in place to help protect your information.

Your personal information is only accessible by appropriately trained staff and is stored on secure servers which have features to prevent unauthorised access.

**9. International Data Transfers**

Given that we are a UK-based organisation we will normally only transfer your personal information within the European Economic Area (“EEA”), where all countries have the same level of data protection law as under the GDPR.

We may use agencies and/ or suppliers to process personal information on our behalf, it is possible that personal information we collect from you will be transferred to and stored in a location outside the EEA, for example the United States.

Please note that some countries outside of the EEA have a lower standard of protection for personal information, including lower security requirements and fewer rights for individuals. Where your personal information is transferred, stored and/ or otherwise processed outside the EEA in a country that does not offer an equivalent standard of protection to the EEA, we will take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards (such as by entering into standard contractual clauses which have been approved by the European Commission) designed to protect your personal information and to ensure that your personal information is treated securely and in accordance with this Notice.

If you have any questions about the transfer of your personal information, please contact us using the details below.

Unfortunately, no transmission of your personal information over the internet can be guaranteed to be 100% secure. However, once we have received your personal data, we use strict procedures and security features to try and prevent unauthorised access.

**10. Your data protection rights**

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for marketing purposes or to unsubscribe from our mailing list at any time. You also have the following rights:

a) Right of access – you have the right to ask us for copies of your personal information. You can contact us to ask for confirmation of what personal information we hold on you and to request a copy of that personal information. Provided we are satisfied that you are entitled to see the personal information requested and we have successfully confirmed your identity, we will provide you with your personal information subject to any exemptions that apply.

b) Right of erasure – at your request we will delete your personal information from our records as far as we are required to do so. In some cases, we would propose to suppress further communications with you, rather than delete it.

c) Right of rectification – if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated. You also have the right to ask us to complete information you think it is incomplete.

d) Right to restrict processing – you have the right to ask for processing of your personal information to be restricted if there is disagreement about its accuracy or legitimate usage.

e) Right to object – you have the right to object to processing where we are (i) processing your personal information on the basis of our legitimate interests, (ii) using your personal information for direct marketing or (iii) using your information for statistical purposes.

f) right to data portability – to the extent required by the GDPR, where we are processing your personal information either

(i) by relying on your consent or

(ii) because such processing is necessary for the performance of a contract to which you are party or to take steps at your request prior to entering into a contract, and in either case we are processing using automated means (i.e. with no human involvement), you may ask us to provide the personal information to you in a machine-readable format.

g) Rights related to automated decision-making – you have the right not to be subject to a decision based solely on automated processing of your personal information which produces legal or similarly significant effects on you, unless such a decision

(i) is necessary to enter into/perform a contract between you and us/another organisation;

(ii) is authorised by EU or Member State law to which Glow The Tanning Studio Limited is subject (as long as that law offers you sufficient protection); or

(iii) is based on your explicit consent.

Please note that some of these rights only apply in limited circumstances.

If you wish to exercise any of your rights please complete this [form](https://www.kwiktan.co.uk/wp-content/uploads/2019/02/Access-to-Personal-Data-Request.docx). The form is designed to assist you in the process of making an information request and, as a result, may speed the process up. It is not mandatory and all information requests from individuals made in other formats will also be processed however we may need to contact you for further information if required.

If you have any queries or concerns, please contact us at contact@glowthetanningstudio.co.uk

If you are dissatisfied, you can make a complaint about the way we process your personal information to us. You are further entitled to make a complaint to the Information:

Commissioner’s Office – [www.ico.org.uk](http://www.ico.org.uk/):

The Information Commissioner’s Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate)

Email: <https://ico.org.uk/global/contact-us/email/>

**11. Changes to this Notice**

We keep our Privacy Notice under regular review and may change it from time to time. If we make any significant changes, we will post the changes on this page.

**12. Links and third parties**

Where we provide links to websites of other organisations, this Notice does not cover how that organisation processes personal information and we are not responsible for the privacy practices organisations. We encourage you to read the privacy notices on the other websites you visit.

**13. How to contact us**

There are many ways you can contact us, including email, phone and post. Please let us know if you have any questions or concerns about this Notice or about the way in Glow The Tanning Studio Limited processes your personal information by contacting us.

Email:  contact@glowthetanningstudio.co.uk

Telephone: 01784

Post: Glow The Tanning Studio Limited
147 Kingston Road
Staines-Upon-Thames

Surrey

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