

OUR PRIVACY POLICY

(revised October 2019)

This Privacy Policy sets out how Your Colour & Style (YC&S) collects and processes data, particularly relating to the General Data Protection Regulations (GDPR) operating from 25th May 2018.

YC&S will conform to legal requirements, but is also keen to ensure the principles of the law are upheld. Personal information provided for the provision of services or for any goods bought will not generally be passed to third parties, but if it is required – usually for a specific purpose – (such as measurements passed to a tailor), the data needed to be passed and the intention will be clearly communicated and only then passed following written consent. Protection of personal data is important to us.

This Privacy Policy should be read carefully. By continuing to use YC&S services you are confirming acceptance of this Policy. If you do not accept the terms of this Policy you must not continue to use the service or website and cease activity immediately. Personal information you have provided to us is collectively referred to as DATA, and is further defined within this policy.

THE DATA WHICH MAY BE COLLECTED

- Data is collected whenever a booking is made to use YC&S services. It may be obtained by conversation, by e-mail, by phone or via the Your Colour & Style (YC&S) website.
- Data may also be collected when you respond to any marketing communications, provide feedback on services or client surveys.
- If you visit YC&S premises, you may be video'd by external premises CCTV (CCTV has been installed to prevent and detect criminal acts).
- Data collected without limitation, may include the following, taken from all information you have provided:
 1. Your full name, address and post code, e-mail address where provided, social media contact details (eg WhatsApp, Facebook, LinkedIn or Messenger), telephone numbers and information about the service provided or requested.
 2. Your "season".
 3. Your "clothing personality".
 4. Measurements, such as height and garment sizes.
 5. Pictures (eg "before" and "after" colour analysis, and with certain garments).
 6. Preferences, such as skin sensitivities.
 7. Preferences about where you like to buy clothes and your budget for shopping purposes.
 8. Services you have used from YC&S and items bought through introductions from YC&S (eg shop brands, bras, make-up and Kettlewell clothing).
 9. Birthday – for loyalty reward purposes. (This is not mandatory.)
 10. Your credit or debit card details are not kept by YC&S when a payment is made using iZettle (see iZettle's Privacy Policy for how they handle data).
 11. Your activity on the YC&S website, including through Cookie information.

THE USE OF DATA

The information obtained is used to fulfil client requests (helping clients connect with the right colour and style of clothes, accessories and make-up). Only data which is necessary for the fulfilment of the request will be collected. Information may be collected over a period of time for different requests. As long as a client wishes to remain a client of YC&S, the information will be kept, unless that person requests to have their data expunged, or deceases.

Birthdays are used to reward loyalty for clients. Clients who decline to give their birthday will be rewarded on the anniversary of becoming a client for the purposes of the loyalty scheme.

The data may be selectively used at times to facilitate record keeping, monitor marketing/promotional information which may be of interest to clients or interested parties.

A third party is contracted to host and maintain the website, collect and transmit data (such as communications through the website) and the security systems to protect the website. Third parties are contractually obligated to confidentiality with YC&S.

An accounting package, Xero, is used. Xero have their own Privacy Policy.

No data is passed to or shared with outside third parties or any external business unless required in the course of fulfilling YC&S services. Where required, the data subject will be informed before any transfer of information and written consent obtained beforehand.

Data kept by YC&S is processed within the EU. Where other programmes are used (such as Mailchimp, IZettle, Xero or cloud back-up services), over which YC&S has no control, steps have been taken to ensure that data stored in this way are kept according to GDPR requirements.

YC&S, if required by law, may disclose personal data.

LEGAL BASIS FOR PROCESSING

The legal basis for processing data will depend on the nature of the activity and request.

If the data subject has requested one of YC&S services, the legal basis for YC&S processing data (such as using contact details to confirm appointments, having the home address where appointments take place, and telephone numbers to confirm appointments) is PERFORMANCE OF A CONTRACT.

Another reason to communicate with a data subject, who may not have requested a specific service from YC&S, is if written CONSENT has been given for such contact (eg to receive marketing emails, generally through Mailchimp). Such consent can be

withdrawn at any time by using the “unsubscribe” facility in the emails, or by emailing YC&S to request emails to cease. Mailchimp has its own Privacy Policy.

DATA SECURITY

The data may be kept in paper or electronic forms. If paper, it will be kept in a locked filing cabinet. Electronic data is stored with passwords, and backed up regularly into “a cloud”.

Every reasonable precaution is made to provide that our internal systems remain secure to safeguard the personal data provided. However, please be aware that security of data transmitted over the internet cannot be fully guaranteed. Data sent via the internet will be at the sender’s risk.

ACCESS TO AND AMENDMENTS TO DATA.

Data subjects have a right to request a copy of the data information which is held by YC&S on them. Requests must be in writing, either by e-mail to fiona.yourcolourandstyle@gmail.com with the subject matter request or to YC&S at 16 Wheatears Drive, West Wellow, Romsey, SO51 6RA. No fee will be requested. Normally the data will be provided within one calendar month of receipt of your written request.

If at any time circumstances change it may be necessary to amend your personal Data to ensure accuracy at all times. Amendments or a withdrawal of consent may be made by contacting YC&S by email (fiona.yourcolourandstyle@gmail.com), text 07469 246722, or by letter to the business address: 16 Wheatears Drive, West Wellow, Romsey, SO51 6RA.

Where you have withdrawn your consent to all or any partial use of data we will be unable to continue to provide any further service including any product, or bookings already in place. Please note, this does not override our cancellation policies, and in the event that you withdraw consent outside of the cancellation period, the applicable fees will still be charged.

RETENTION OF PERSONAL INFORMATION

Some data (eg used for accounts purposes) will be retained for six years as required.

Personal Data is retained for the period and purpose for which it has been collected, for business purposes including any legal or applicable laws. In the event of you choosing to unsubscribe or withdraw your consent the Data may be retained without use for such time as the law permits or up to six months from notice of withdrawal. After that time certain data will only be used anonymously for YC&S statistical purposes and otherwise securely disposed of.

AMENDMENTS TO THIS PRIVACY POLICY

From time to time and in accordance with any GDPR changes or statutory requirements, this Privacy Policy will be reviewed and or amended. Any changes or amendments will be notified on the YC&S website.