**LTL Tanning Limited**

**Client Privacy Notice**

**The Purpose** of this privacy notice is to explain how LTL Tanning Limited, referred to as **LTL** hereafter, processes personal data to fulfil its data protection responsibilities.

**The Role of LTL** in data protection terms is that of a data controller where it determines the purpose and use of personal data collected. Once received it becomes the responsibility of the LTL privacy manager (PM) contactable using levechetanningltd@gmail.com. The PM ensures that all processing accords with the latest UK data protection legislation.

**The sort of personal data collected by LTL** will be basic contact details sufficient to be able to respond to general enquiries and provide our services. If you are going to use our sunbeds and/or you need a patch test before treatment, we will ask you for certain health related information beforehand.

**LTL’s duty of confidentiality** means thatLTL staff will treat your personal data with due respect and in confidence. It is only disclosed to those that need to know it. We expect the same duty of confidentiality from all third parties with whom LTL shares personal data. Data processing agreements are in place when required.

**LTL processes personal data against a lawful basis** and such instances are described below:

* We will pursue our legitimate interests to respond to your general enquiries and stay in touch with you, for marketing purposes, if you have been our client
* To comply with our legal obligations
* When it is necessary for the performance of a contract and its prior preparation, typically when you are signing up for some form of treatment
* When processing for a pre-defined purpose for which your consent will be sought prior to the processing commencing; this includes requesting your explicit consent to process health-related data (when applicable) – please note that consent can be withdrawn at any time by contacting the PM

**In all cases the processing of personal data** by LTL shall be done in accordance with the principles of data protection.

**LTL will share personal data**, on a ‘need to know’ basis with some or all of the following:

* Health professionals, but only with your permission
* Unspecified recipients but only when compelled to do so for legal reasons

**LTL will process your personal data in the UK and the EU**. LTL uses appropriate technical and organisational measures to safeguard all personal data.

**LTL follows a retention schedule** to determine the length of time it holds different types of personal data. The retention schedule is shown below:

* Routine correspondence that is related to service-related queries will be retained for 2 years after our last contact with you
* For former clients, we will retain your personal data for 2 years after our last contact with you, although we will retain records of treatment received indefinitely
* Contact data is stored indefinitely unless a valid request to erasure is received from the interested data subject
* By exception, documentation that includes personal data may be retained by LTL beyond the schedule, but only for a specific purpose and only when LTL believes it has a legitimate interest or a legal obligation to do so

**At the end of the retention schedule** LTL will either return, destroy or delete your personal data and any associated emails or relevant documentation. If it is technically impractical to delete electronic copies of personal data, it will put it beyond operational use. It should be noted that LTL allows up to 3 months after the retention schedule to complete the action.

**Where the LTL website uses non-essential cookies,** and similar technologies, you will be asked for consent prior to their use.

**The UK General Data Protection Regulation** **defines the rights** that you have, although these do not apply in all situations. For convenience, these rights are shown below:

* Right to be informed as to how we process your personal data – this is done through this notice
* Right to access your personal data held by us which is done by making a ‘Data Subject Access Request’ (DSAR) to the PM
* Right to rectification of your personal data if you believe we have collected it incorrectly or it needs to be updated
* Right to erasure of your personal data for which we no longer have a legitimate purpose to process
* Right to restrict processing under certain circumstances, during which time your personal data but will be out of operational use until the related matter is resolved
* Right to data portability of your personal data in a machine-readable version, but this only applies to data that has been provided with consent or under contract
* Right to object to our processing your personal data for which it does not have a legal or contractual obligation
* Rights related to automated decision making and profiling (although we do not use these techniques in its decision making)

**Further details on data subjects’ rights** can be found on the Information Commissioner’s Office (ICO) website: [https://ico.org.uk](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/).

**Raising concerns, exercising rights or making queries** about our processing of your personal datacan be done by contacting the PM. Be aware that we will need to verify your identity before responding fully. This may involve asking you for documentary proof that, in context, will enable us to confirm your identity. Alternatively, you may contact the ICO directly without referring to us first, although naturally we would welcome the first opportunity to address your concerns or queries.

v1.0

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