

Privacy Policy

This Privacy Policy sets out how we, Tout Ltd, collect and process your personal data through your use of this website, <https://aurora-aesthetics.co.uk/>(our **website**), or where we otherwise obtain or collect your personal information. This Privacy Policy is effective from 01/10/2024.

Please read this Privacy Policy carefully. We recommend that you print off a copy of this Privacy Policy and any future versions in force from time to time for your records.

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Summary

This summary provides an overview of how we obtain, store and use your personal information. It is intended to provide a very general overview only. It is not complete and must be read in conjunction with the corresponding full sections of this Privacy Policy.

- **Data controller:** Tout Ltd
- **How we collect or obtain your information:**
 - when you provide it to us (e.g. by contacting us, completing a checkout process, booking a service, signing up to our newsletter,)
 - from your use of our website, using cookies
- **Personal information we collect:** name, contact details, information about your computer (e.g. your IP address and browser type), payment information (e.g. your credit or debit card details when making payment through our website), information about how you use our website (e.g. which pages you have viewed, the time you viewed them, and what you clicked on), information about your mobile device (such as your geographical location). transactional information (including products purchased and total spend)
DOB
title
Clinic choice
- **How we use your personal information:** for administrative and business purposes (particularly to contact you and process orders you place on our website), to improve our business and website, for advertising and analytical purposes, in connection with our legal rights and obligations and for certain additional purposes only with your explicit consent.
- **Disclosure of your personal information to third parties:** only to the extent necessary to run our business, fulfil any contracts we enter into with you, where required by law or to enforce our legal rights.
- **Do we sell personal information to third parties:** No
- **How long we retain your personal information:** for no longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes) and any other legal basis we have for using your personal information

e.g. your consent, performance of a contract with you or our legitimate interests as a business.

- **How we secure your personal information:** using appropriate technical and organisational measures such as storing your personal information on secure servers, encrypting transfers of data to or from our servers, encrypting payments on our site via Secure Sockets Layer (SSL) and only granting access to your personal information where necessary.
- **Use of cookies:** we use cookies and similar information-gathering technologies such as web beacons on our website including analytical and targeting cookies.
- **Transfers of your personal information outside the European Economic Area:** we will not transfer your personal information outside of the European Economic Area.
- **Your rights in relation to your personal information**
 - to access your personal information and to be informed about its use
 - to correct your personal information
 - to have your personal information deleted
 - to restrict the use of your personal information
 - to object to the use of your personal information
 - to complain to a supervisory authority
 - to withdraw your consent to the use of your personal information
- to use appropriate technical and organisational measures such as storing personal information on secure servers
- only granting access to personal information where necessary
- using a non-standard URL for logging in to the content management system

Contact Details

The Data Controller in respect of our website is Tout Ltd (04490890) of Tout Ltd, 58 Main Road, Cleeve, North Somerset, BS49 4NR. You can contact the Data Controller by writing to Tout Ltd, 58 Main Road, Cleeve, North Somerset, BS49 4NR or sending an email to info@touts.co.uk.

The data protection officer for the Data Controller is Steven Hockey. You can contact the data protection officer by writing to Tout Ltd, 58 Main Road, Cleeve, North Somerset, BS49 4NR or sending an email to info@touts.co.uk.

If you have any questions about this Privacy Policy, please contact the Data Controller.

How we collect or obtain personal information about you

Information collected from you

We collect personal data about you. This means any information about an individual from which that person can be identified. This data is only collected from you when you provide it to us, such as through your use of our website and its features, when you contact us directly by email, phone, in writing, or via social media, when you order goods and services, when you use any of our other websites or applications or any other means by which you provide personal information to us.

Information received about you from third parties

We may receive information about you from third parties such as our affiliates, business partners, (where authorised or permitted by law) credit and fraud checking agencies, Hambrand Technology Company T/A Pabau (<https://pabau.com/>) as well as third parties with whom we have had no prior contact.

Information collected from your use of our website

We also collect information about your use of our website through cookies and similar technologies. This Privacy Policy sets out more of the information on how we use cookies and similar technologies to collect information about you.

Personal information we collect or obtain about you

The type of information we collect about you includes information such as:

- your name;

- your email address;
- your address;
- your phone number;
- your payment information (e.g. your credit or debit card details);
- your IP address;
- information about your device (e.g. device and browser type);
- information about how you use our website (e.g. which pages you have viewed, the time you viewed them and what you clicked on);
- information about your mobile device (such as your geographical location);
- transactional information (including products purchased and total spend)
- DOB
- title
- clinic choice

Information received from you

When you contact us by email, the information we collect about you will be your name and email address and any other information you provide to us.

When you contact us using the contact form on our website, we will collect:

- your name
- email address
- title
- first name
- surname
- dob
- email
- house name/number
- street name
- town/city
- postcode
- mobile
- password

- password confirmation

We also collect any other information you provide to us, including any optional information.

Such as:

- which clinics they use
- phone number

Information received from third parties

Information we obtain from third parties will generally be your name and contact details, but also any additional information they provide to us.

We may also obtain personal information about you from certain publicly accessible sources, such as the electoral register, online customer databases, business directories, media publications, social media, websites, and other publicly accessible sources.

Please note that there are circumstances in which we may not be required to provide you with the information contained in this Privacy Policy (if you already have the information, for example).

Circumstances where we will provide you with the information in this Privacy Policy if we obtain your personal information from someone other than you

Where we obtain personal information about you from a source other than yourself, we will provide you with the information in this Privacy Policy unless:

- you already have the information;
- providing you with the information would prove impossible or would involve a disproportionate effort;
- we are under an EU or EU member state law obligation to obtain or disclose the information which provides appropriate measures to protect your legitimate interests; or
- we are obliged to keep the information confidential as a result of an obligation of professional secrecy regulated by EU or EU member state law.

Timeframes for providing you with the information in this Privacy Policy where we have obtained your personal information from a source other than you

Where we obtain personal information about you from a source other than yourself, and we are required to provide you with the information in this Privacy Policy, we will provide it to you at the following points in time:

- if we intend to use your personal information to communicate with you, at the point when we first communicate with you;
- if we envisage that we will disclose your personal information to a third party, when we disclose your personal information to that third party (at the latest); and
- in any other circumstances, within a reasonable period after obtaining your personal information (and in any event within one month at the latest), taking into account the specific circumstances in which we use your personal information.

How we use your personal information

We will only use your personal information when the law allows us. Most commonly, we will use your personal data in the following circumstances:

Administrative and business purposes

- **Improving our website and business, including personalising our website and services for you and other customers.** This is necessary for our legitimate interest of better understanding our customers' and potential customers' preferences and tailoring our website, products and services to their needs, preferences and desires.
- **Communicating directly with you with information, updates and changes to our website and in response to enquiries we receive from you.** This is necessary for our legitimate interests of informing you about changes to our business, website and privacy policy and responding to enquiries we receive from you.

- **Providing you with offers relating to our products and services which are similar to the products and services which you purchased from us or were in negotiations to purchase from us (provided that you did not opt-out from receiving such communications either at the time or subsequently).** This is necessary for our legitimate interest of direct marketing and advertising our products and services.
- **Protecting our business and our business interests, including for the purposes of credit and background checks, fraud and website misuse prevention and debt recovery.** This is necessary for our legitimate interests of preventing criminal activity such as fraud or money laundering, for ensuring that our website and services are not misused. Where we carry out credit and background checks, we will only carry out such checks to the extent that we are permitted or authorised by law to do so and to the minimum extent necessary.
- **Communicating with our business advisors and legal representatives.** This is necessary for our legitimate interests of obtaining legal or professional business advice. In such circumstances, we will only share your personal information where it is necessary to do so, to the minimum extent necessary, subject to appropriate confidentiality restrictions and on an anonymised basis wherever possible.
- **Sharing your personal information with third parties,** including service providers and data processors, which are either related to or associated with the running of our business (including to third parties within our corporate group from time to time), such as our business partners, insurers, accountants, affiliates, associates, suppliers, independent contractors, email providers, IT and web development service providers, Loyalty hosting companies, our web development agency which is GoDaddy. (5th Floor, The Shipping Building, Old Vinyl Factory, 252-254 Blyth Road, Hayes, UB3 1HA). We will share your personal information with these third parties where it is necessary for our legitimate interest of running and managing our business effectively, fulfilling our contractual obligations (e.g. to our insurers) or for our own direct marketing purposes. Where you purchase goods or services from us or request that we take steps to do so, we may also need to share your personal information with such third parties in order to perform a contract which we have entered into with you or to take steps, at your

request, to enter into a contract with you. Where we share your personal information with such third parties, we will do so strictly on a need-to-know basis, subject to appropriate confidentiality restrictions, on an anonymised basis as far as possible and only to the extent strictly necessary for any of these purposes.

- **Ensuring physical, network and information security and integrity.** This is necessary for our legitimate interest of ensuring that our IT systems and networks are secure and uncompromised, including, for example, preventing malware, viruses, bugs or other harmful code, preventing unauthorised access to our systems, and any form of attack on, or damage to, our IT systems and networks.
- **In connection with disclosure requests and in the case of a business or share sale or sale or purchase of a business and/or assets, whether actual or potential.** This is necessary for our legitimate interests of selling and/or ensuring and promoting the success of our business. Where we share your personal information with a prospective purchaser or seller, we will do so on a strictly need-to-know basis, subject to appropriate confidentiality restrictions, on an anonymised basis as far as possible and only to the extent strictly necessary for any of these purposes.

Advertising and analytical purposes

- Providing statistical information to third parties such as Google Analytics, New Relic, Hambrand Technology Company T/A Pabau (<https://pabau.com/>) and Cookie Consent by GoDaddy. This is necessary for our and third parties' legitimate interests of processing personal information for research purposes, including market research, better understanding our respective customers, and tailoring our respective products and services to their needs.
- **Displaying advertisements to you and analysing the information we receive in relation to those advertisements.** This is necessary for our own and for third parties' legitimate interests in direct marketing and advertising our and their products and services respectively, and for market research purposes.

Legal and enforcement of legal rights

- **Enforcing our legal rights.** This is necessary for our legitimate interest of protecting our business and enforcing our contractual and other legal rights.
- **Indicating possible criminal acts or threats to public security to a competent authority.** This is necessary for our legitimate interest of preventing crime, for compliance with a legal obligation to which we are subject, in the general public interest or for the legitimate interests of governmental bodies and competent authorities that prevent crime.
- **In connection with any legal or potential legal dispute or proceedings.** This is necessary for our legitimate interest of resolving disputes and making such disclosures as are required by law or which we consider, acting reasonably, are required by law.
- **Complying with laws, regulations and other legal requirements.** We may need to use and process your personal information in order to comply with legal obligations to which we are subject. For example, we may require your personal information pursuant to a statutory obligation to conduct anti-money-laundering checks or to disclose your information to a court following receipt of a court order or subpoena. We may also need your personal information to comply with ongoing legal obligations, such as tax laws and regulations to which we are subject (where you have placed an order for goods or services with us for example).

The processing of your personal information to comply with legal obligations to which we are subject applies to legal obligations of other countries where they have been integrated into the legal framework of the United Kingdom, for example in the form of an international agreement which the United Kingdom has signed. Where the legal obligations of another country have not been so integrated, we will process your information to comply with such obligations where it is in our legitimate interest to do so.

Use of your personal information only where we have your consent

We will process your personal information for one or more of the following purpose(s) only where we have obtained your consent to do so:

- To provide you with offers relating to goods and services we offer from time to time.
- Reporting and Analysing
- Individual and recommended offers, events and emails
- For internal operations, including data analysis, research, statistical and survey purposes;
- to make suggestions and recommendations to you and other Aurora Aesthetics clients about goods, offers, promotions and / or events that may interest you or them.

Opting Out

Where we process your personal information on the basis of your consent, you can withdraw your consent to such processing at any time by emailing us at info@touts.co.uk or writing to us at 58 Main Road, Cleeve, North Somerset, BS49 4NR.

How long we retain your personal information

In general, we will retain your information for no longer than necessary, taking into account the following:

- the purpose(s) for which we are processing your personal information, such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or for our legitimate interests;
- whether we have any legal obligation to continue to process your information, such as any record-keeping obligations imposed by applicable law; and
- whether we have any legal basis to continue to process your personal information, such as your consent.

Where you contact us with an enquiry, we will retain your information for as long as it takes to respond to and resolve your enquiry, and for 48 further month(s), after which point we will delete your information.

How we secure your personal information

We take appropriate technical and organisational measures to secure your personal information and to protect it against unauthorised or unlawful use or processing as well as against the accidental loss or destruction of, or damage to, your personal information, including:

- only sharing and providing access to your personal information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secure servers to store your personal information;
- verifying the identity of any individual who requests access to personal information prior to granting them access to personal information;
- using Secure Sockets Layer (SSL) software or other similar encryption technologies to encrypt any payment transactions you make on or via our website;
- only transferring your personal information via closed system or encrypted data transfers;

Transmission of information (including personal information) over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk. We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

Our use of cookies and similar technologies

Cookies are data files which are sent from a website to a browser to record information about users of a website.

We use cookies and similar technologies on or via our website. This Privacy Policy states information on how we use cookies and similar technologies, including the information we collect through our use of cookies and similar technologies.

You can reject some or all of the cookies we use on or via our website by changing your browser settings, but doing so may impair your ability to use our website or some or all of its features. For further information about cookies, including how to change your browser settings, please visit www.allaboutcookies.org

We use Google Analytics on our website to understand how you engage and interact with it. For information on how Google Analytics collects and processes data using cookies, please visit www.google.com/policies/privacy/partners/. You can opt out of Google Analytics tracking by visiting: <https://tools.google.com/dlpage/gaoptout>

We use web beacons in our marketing emails and on our website. For information on how third parties use information gathered from our use of web beacons, please visit <https://www.campaignmonitor.com/policies/>. Some (but not all) browsers enable you to restrict the use of web beacons by either preventing them from sending information back to their source (e.g. when you choose browser settings which block cookies and trackers) or by not accessing the images containing them (e.g. if you select a “do not display images (in emails)” setting in your email server).

Your legal rights in relation to your personal information

You have the following rights in relation to your personal information, which you can exercise by writing to the following address: 58 Main Road, Cleeve, North Somerset, BS49 4NR or sending an email to info@touts.co.uk:

- **to request access to your personal information** and information related to our use and processing of your personal information;
- **to request the correction or deletion** of your personal information;
- **to request that we restrict our use** of your personal information;

- **to receive personal information which you have provided to us in a structured, commonly used and machine-readable format** (e.g. a CSV file) and the right to have that personal information transferred to another Data Controller (including a third party Data Controller);
- **to object to the processing of your personal information for certain purposes** (for further information, see the section below entitled ‘Your right to object to the processing of your personal information for certain purposes’); and
- **to withdraw your consent to our use of your personal information** at any time where we rely on your consent to use or process that personal information. If you withdraw your consent, this will not affect the lawfulness of our use and processing of your personal information on the basis of your consent before the point in time when you withdraw your consent.

You also have the right to lodge a complaint with a supervisory authority, which, for the purposes of the UK, is the Information Commissioner’s Office (ICO), the contact details of which are available here: <https://ico.org.uk/global/contact-us/>

Further information on your rights in relation to your personal data as an individual

For further information about your rights in relation to your personal information, including certain limitations which apply to some of those rights, please visit the following pages on the ICO’s website:

- <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>; and
- <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

You can also find out further information about your rights, as well as information on any limitations which apply to those rights, by reading the underlying legislation contained in Articles 12 to 22 and 34 of the General Data Protection Regulation (GDPR), which is available here: http://ec.europa.eu/justice/data-protection/reform/files/regulation_oj_en.pdf

Verifying your identity where you request access to personal information

Where you request access to personal information, we are required by law to use all reasonable measures to verify your identity before doing so. Where we possess appropriate information about you on file, we will attempt to verify your identity using that information. If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your personal information.

These steps are necessary to verify your identity in order to reduce the risk of identity fraud or identity theft by persons other than yourself asking for access to your personal information.

Your right to object to the processing of your personal information for certain purposes

You have the following rights in relation to your personal information, which you may exercise in the same way as you may exercise the rights in the preceding section (*Your rights in relation to your personal information*):

- to object to us using or processing your personal information where we use or process it in order to **carry out a task in the public interest or for our legitimate interests**, including 'profiling' (i.e. predicting your behaviour based on your personal information) based on any of these purposes; and
- to object to us using or processing your personal information for **direct marketing purposes** (including any automated evaluation we make about you or any of your characteristics as a person, to the extent that it is related to such direct marketing).

You may also exercise your right to object to us using or processing your personal information for direct marketing purposes by:

- **clicking the unsubscribe link** contained at the bottom of any marketing email we send to you and following the instructions which appear in your browser following your clicking on that link;
- **sending an SMS message** containing only the words “OPT OUT” in reply to any marketing communication we send by text message; or
- **sending an email** to info@touts.co.uk, asking that we stop sending you marketing communications or by including the words “OPT OUT”.

Whenever you object to direct marketing from us by a different communication method to that of the marketing communications you have received from us, you must provide us with your name and sufficient information to enable us to identify you in relation to the communications you have received (for example, if you have received text messages from us and you wish to unsubscribe by email, we may need you to provide us with your phone number in that email).

Consequences of not providing your personal information to us

Where you wish to purchase products or services from us, we require your personal information in order to enter into a contract with you. We may also require your personal information pursuant to a statutory obligation (in order to be able to send you an invoice for products and services you wish to order from us, for example).

If you do not provide your personal information, we will not be able to enter into a contract with you or to provide you with those products or services.

Changes to our Privacy Policy

We may change our Privacy Policy from time to time without providing prior notice to you. If required by law, we will make such changes to our Privacy Policy known to you by posting a notice on the website and/or by us posting an updated version of our Privacy Policy on our website with a new effective date stated at the beginning of it. Our processing of your personal information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

Where we intend to use your personal information for a new purpose other than the purpose(s) for which we originally collected it, we will provide you with information about that purpose and any other relevant information before we use your personal information for that new purpose and obtain your consent if required.

Changes to your information

Please inform us of any changes to any information (including personal information) which we hold about you so we can keep the information we hold about you accurate and up-to-date.

Children's Privacy

Because we care about the safety and privacy of children online, we comply with the Children's Online Privacy Protection Act of 1998 (COPPA). COPPA and its accompanying regulations protect the privacy of children using the internet. We do not knowingly contact or collect personal information from children under the age of 13. The website is not intended to solicit information of any kind from children under the age of 13.

It is possible that we may receive information pertaining to children under the age of 13 by fraud or deception. If we are notified of this, as soon as we verify the information, we will immediately obtain the appropriate parental consent to use that information or, if we are unable to obtain such parental consent, we will delete the information from our servers. If you would like to notify us of our receipt of information about children under the age of 13, please do so by sending an email to info@touts.co.uk. Individuals must be at least 18 years of age to use Aurora Aesthetics services.

California Do Not Track Disclosures

"Do Not Track" is a privacy preference that users can set in their web browsers. When a user turns on a Do Not Track signal in their browser, the browser sends a message to websites requesting that they do not track the user. For information about Do Not Track, please visit www.allaboutdnt.org

At this time, we do not respond to Do Not Track browser settings or signals. In addition, we may use other technology that is standard to the internet, such as pixel tags, web beacons,

and other similar technologies, to track visitors to the website, or one of the affiliated pages. Those tools may be used by us and by third parties to collect information about you and your internet activity, even if you have turned on the Do Not Track signal.

Copyright, credit and logo

This Privacy Policy is based on a General Data Protection Regulation (Regulation (EU) 2016/769) (GDPR) compliant template provided by GDPR Privacy Policy. For further information, please visit <https://gdprprivacypolicy.org>

The copyright in this Privacy Policy is either owned by, or licensed to, us and is protected by copyright laws around the world and copyright protection software. All intellectual property rights in this document are reserved.

Where we display the GDPR Privacy Policy logo on our website, this is used to indicate that we have adopted a privacy policy template provided by GDPR Privacy Policy as the basis for this Privacy Policy.

Data Protection

The information will be retained by Hambrand Technology Company T/A Pabau, the registered Data Controller, operating the booking platform for Aurora Aesthetics. This information, as well as the details of the amount and description of purchases made by the consumer, together with some analysis of such purchases will be retained. We may, from time to time, send you information including offers of goods and services, events and competitions (from us or others) which we think you may find of interest. We may also conduct customer research to help us offer all customers the service they want, therefore, we may wish to contact you in relation to such research.