



ESSENTIAL NAIL PRODUCTS LTD. GDPR STATEMENT. 25th May 2018.

At Essential Nail Products Ltd (ENP), we hold personal data on our students, customer and those that have requested information from us on our courses, products and services. We acquire and store that data in compliance with new Legislation, in the form of the EU *General Data Protection Regulations*. These are designed to ensure more robust security and increased transparency in the use of personal data.

ENP's existing systems and databases were designed to be fully compliant with the old *Data Protection Act 1998*, therefore, most of our approach to compliance remains valid under the *GDPR*. However, the *GDPR* places new specific legal obligations on ENP.

For example, we're now required to maintain records of all personal data processing activities. We have a legal liability if we're responsible for a breach of confidential Student data and our students have a right to request sight of the data we hold on them, how it's used and, if necessary, ask it's removed from our database.

OUR OVERALL POLICY

ENP holds personal data regarding those that have inquired after our courses, products and services, customers that have bought courses or products, our students that are taking our courses and receiving student support and coaching. We only hold data when there's a justifiable need to do so and will remove data if it's no longer required.

ENP has robust security systems to protect data and information, and will promptly inform anyone affected should any breach occur. Finally, and most importantly, ENP will not circulate any personal information to any third parties without prior consent.

THE DATA WE HOLD

We currently hold data that is pertinent to the *GDPR* in three main areas:

1 Student Data

We hold details such as your name, address, contact number and email addresses, in order to maintain contact. We hold data on the courses you are taking with us, your enquiry history and conversations, and the grading of your course work and certification issued. We also may hold data on your age.

2 Transactional Data

Details of any payments you make to the ENP are held electronically, this includes records training course fees and merchandise sales.

3 Employee Information

We hold details and working records for our members of staff, contractors and some volunteers. This is accessible only to senior personnel *Handbook* sets out the terms of access to staff members' own records.

Please also note that every ENP member holds personal information, which comes under the jurisdiction of the *GDPR*, in the form of emails. Staff are reminded in *Codes of Conduct* that all correspondence and address details held remain confidential, and all emails issued should contain a standard confidentiality notice.

PRIVACY

We fulfill the terms of the *GDPR* in having a lawful basis for processing your data, which is held on our database. We confirm that personal data submitted may be stored electronically but will only be used in relation to the established relationship. Statutory obligations excepting, personal data will never be passed on to third parties without your permission.

INDIVIDUAL'S RIGHTS

The *GDPR* includes the following rights for individuals: The right to be informed; the right of access; the right to rectification; the right to erasure; the right to restrict processing; the right to data portability; the right to object; and the right not to be subject to automated decision-making, including profiling.

We do not operate any data-profiling processes.

Upon request, we'll provide a Student with the data that we hold on them, if requested, in electronic format. Individuals will have the right to have their personnel data deleted where they believe it's being held without a practical or lawful basis. The Director will make any final decisions about deletion or release of information. We also acknowledge that individuals have a right to seek access to information held on ENP databases. We will comply with any such request within 30 days. However, we can refuse or charge for requests that are manifestly unfounded or excessive.

CHILDREN

There is a requirement to put systems in place to verify individuals' ages and to obtain parental or guardian consent for any data processing activity. This may be pertinent if ENP are holding information on individuals under the age of sixteen.

BREACHES OF DATA

ENP's systems already fulfill the *GDPR*'s recommended 'privacy by design' approach. Should we become aware of any personal data breach, we will notify you as rapidly as it's feasibly possible.