

# PRIVACY NOTICE

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In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

## **Our contact details:**

Company name: KPACA LTD

Address: Unit D2/D3 Wira Office Park, West Park Ring Road, Leeds, LS16 6EB

Phone: 01132781292

email: [info@kpaca.co.uk](mailto:info@kpaca.co.uk)

For the sake of clarity, we note that no legal claims can be derived from this notification.

## **A) DATA PROTECTION PRINCIPLES**

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- A. processing is fair, lawful and transparent
- B. data is collected for specific, explicit, and legitimate purposes
- C. data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- D. data is kept accurate and up to date, data which is found to be inaccurate will be rectified or erased without delay
- E. data is not kept for longer than is necessary for its given purpose
- F. data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- G. we comply with the relevant GDPR procedures for international transferring of personal data

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

## **B) TYPES OF DATA HELD**

We keep several categories of personal data in order to carry out effective and efficient processes. We keep this data in our computer system.

## **C) COLLECTING YOUR DATA**

We collect personal data from and about you when you sign up to our newsletters and mailing lists. We also use cookies to understand your browsing behaviour on our website to enable us to improve your experience on this and future visits.

We use different methods to collect data from you including:

- **Direct interactions.** You may give us your name and contact details and payment information (if necessary) by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - purchase products or services from us;
  - create an account on any of our systems, including websites and apps
  - subscribe to our mailing lists or newsletters;
  - request marketing to be sent to you;
  - take part in a competition, promotion or survey; or give us some feedback.

The “consent” of a data subject includes every voluntarily given declaration of intent in the context of a determined case, given in an informed and unambiguous way, in the form of a declaration or in a clear affirmative act with which the person makes clear that he/she agrees to the processing of the respective personal data.

#### **Collection of access data and log files from the provider**

Our provider (or rather the computer centre where the website is hosted) will collect the information communicated by your internet provider: in particular the name of the website, date/time of access, transmitted data amount, the IP-address which has been assigned to you, the HTTP status code, information on the browser used and the operative system used by you as well as partly the so-called “referrer” (the source page from where you accessed the actual website or file). An evaluation takes place – if this is carried out automatically by the web host – only for statistical purposes, whereby the single user will remain anonymous.

The collection of this data is furthermore necessary to retrace a (possible) abuse and hence is used for legal security.

- **Automated technologies or interactions.** As you interact with our website, we may automatically collect information about your device and how you use our websites and apps. We collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources such as information about your device and how you use our websites and apps from analytics providers such as Google based outside the EU. On our website we also use services of third-party providers (for example Google Maps, YouTube). Should the mentioned providers use these personal data, this would in any event take place outside of the sphere of responsibility of the provider of this website.

These services always require your IP-address for the presentation of contents, because without the IP-address, the third-party providers would not be able to send contents to your browser. We are committed to use only contents from providers who use the IP-address exclusively to deliver contents. However, we cannot influence it, if third-party providers save the IP-address for example for statistical purposes. Third-party providers can also send cookies to your web browser.

### **Information**

The “buttons” for Facebook, Twitter, Google+, YouTube, Pinterest and Instagram in the footer are not plugins of external pages but links. In this case only by clicking on them a link will be opened in a new window which then calls up the respective services. Only then a data transmission takes place, like for example the transmission of information concerning the “opening page”.

- Name and contact details, payment information and purchase history from providers of technical, payment and delivery services.

## **D) LAWFUL BASIS FOR PROCESSING**

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

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- For certain processing purposes, we may request your consent to authorise the processing.

## **MARKETING MESSAGES AND PROMOTIONAL OFFERS**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

You may receive marketing communications from us if you have requested information from us or purchased products or services from us.

You can tell us that you want to stop receiving marketing communications from us at any time. You can do this by clicking on the unsubscribe link in any email we send you or by contacting our Customer Services Department directly by email ([customerservices@greatlengthshair.co.uk](mailto:customerservices@greatlengthshair.co.uk)), post (KPACA, Great Lengths, Units D2 – D3 Wira Office Park, West Park Ring Road, Leeds, LS16 6EB) or over the phone (0113 278 1292).

We’ll process any such request as quickly as we can, but it might take a few days for all of our systems to be updated.

## **COOKIES**

We use cookies on our websites. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the website may become inaccessible or not function properly.

## **DURATION OF DATA RETENTION**

Your personal data will be deleted, if they are no longer needed for justifiable and admissible purposes or as soon as you revoke your consent and we are not legally bound or in any other way authorised to save this data anymore. Your data will be saved in particular to respect legal retention obligations as long as they may be needed for the enforcement, the implementation and defence of claims or for the enforcement and implementation of claims, the representation of interests and the defence against accusations in administrative or judicial or other institutional procedures.

## GOOGLE ANALYTICS

This website uses Google Analytics, a web analysis service of Google Inc. (“Google”). Google Analytics uses so-called “cookies”, text files which will be saved on your computer and facilitates the analysis as regards the use of the site by you. The information generated by the cookie concerning your use of this website is normally transmitted to a server of Google in the US and saved there. In case of activation of the IP-anonymisation on this website, your IP-address will first be shortened within the Member States of the European Union or in other contractual countries in which the agreement of the European Economic Area applies. Only in exceptional cases the entire IP-address will be transmitted to a server of Google in the US and shortened there. On behalf of the provider of this website Google will use this information to evaluate your use of this website, to create reports on the website activities and to perform further services connected to the website use and the internet use vis-à-vis the website provider.

The IP-address transmitted from your browser in the framework of Google Analytics, will not be combined with other data from Google.

You can prevent the storage of cookies through specific settings in your browser software: but please note that in this case you will eventually not be able to use all functions of our website to their full extent. Furthermore, you can prevent the collection of data which are generated through cookies and refer to your use of this website (incl. your IP-address) as well as the processing of this data by Google by downloading and installing the browser plug-in available at the following link:

<https://tools.google.com/dlpage/gaoptout?hl=en>

This website uses Google Analytics with the extension „\_\_anonymise()“. By that the shortened IP-addresses are further processed, and hence a personalisation can be excluded. If the data collected on you allow a personalisation, this will immediately be excluded, and the personal data will then be deleted. We use Google Analytics to analyse the use of our website and to be able to regularly improve it. Through the gained statistics we can improve our offer and render it more interesting for you as a user. In exceptional circumstances, when personal data is transmitted to the U.S., Google submitted itself to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>. The legal basis for the use of Google Analytics is art. 6 clause 1 lit. GDPR.

Information of the third-party provider: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001. User conditions:

<https://www.google.com/analytics/terms/us.html>, overview on the data protection:

<https://support.google.com/analytics/answer/6004245?hl=en>, as well as the privacy statement:

<https://policies.google.com/privacy?hl=en>.

Alternative Google Analytics Opt Out (also for mobile devices)

By clicking the following link an opt-out cookie is stored on your device. This prevents Google Analytics from collecting data within this website in the future. The opt-out only works in this browser, and only for this domain. If you delete your cookies in this browser, you need to click on this link again.

[Set Google Analytics opt-out cookie](#)

## YOUTUBE

On this website components of YouTube are used. YouTube is a video platform where users can upload videos and make them accessible to the public.

The operating company of YouTube is the YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. Since 2006 YouTube LLC is an affiliate of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, U.S..

When calling up an individual page of this website on which a YouTube component has been integrated (YouTube-Video), the browser on your terminal device will be automatically prompted to download a presentation of the YouTube video. In the context of this technical procedure YouTube and Google will get to know exactly which bottom side of our website you visited.

If during your visit on our website you are at the same time logged into your YouTube account, this collected information can be related to your YouTube account by YouTube and Google. This takes place independently from the fact whether you clicked on a YouTube video on our website or not.

If you do not want such a transmission of information to YouTube and Google, you can prevent that by logging yourself out from your YouTube account before accessing our website.

The published privacy regulations of YouTube are available at <https://policies.google.com/privacy?hl=en>.

## **FACEBOOK**

On this website, components of Facebook might be integrated. Facebook is a social network, an online community which normally enables its users to communicate with each other and interact within a virtual space. Facebook enables the users of the social network to create a private profile, upload pictures and connect with friends via friend requests.

The operating company of Facebook is Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, U.S. If a data subject lives outside of the U.S. or Canada the responsible subject for the processing of personal data is Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

If when visiting our website, you are at the same time logged into your Facebook account, Facebook will identify which bottom side you are recently accessing during the entire duration of your visit on our website. This information will be saved by Facebook and then related to your Facebook account. This takes place independently from the fact whether you clicked on a Facebook component or not. If you furthermore confirm one of the Facebook buttons integrated into our website, for example the “Like” button or if you enter a comment, Facebook will relate this information to your personal Facebook account and save the personal data.

If you do not want such a transmission of information to Facebook, you can prevent it by logging out from your Facebook account before accessing our website.

The data protection directive published by Facebook is available at: <https://www.facebook.com/privacy/explanation>

## **USE OF WEB FONTS**

On this internet pages external texts, Google fonts are used. Google Fonts are a service of the company Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043.

Web fonts are incorporated through a server call, normally a server of Google in the U.S.. They allow us to know which internet pages you visited by transmitting the information to the server. Also, your browser’s IP-address of your terminal device will be saved by Google.

Further information will be available in the data protection notice of Google:

<https://fonts.google.com/about#>

<https://policies.google.com/privacy?hl=en>

## **GOOGLE MAPS AND GOOGLE CUSTOM SEARCH**

On this website the component “Google Maps” of the company Google Inc. (“Google”), 1600 Amphitheatre Parkway, Mountain View, CA 94043 U.S. is used for the presentation of interactive maps. When using Google Maps the information concerning the use of our internet page including the IP-address will be transmitted to a server of Google in the U.S. and saved there. By using this website, you declare that you agree to the collection, processing as well as use of your automatically collected data through Google, one of his representatives or third-party providers.

If you do not agree to the data transfer, you have the possibility to deactivate the service of Google Maps and prevent the transmission of data to Google. To do that you need to deactivate the Javascript Function in your browser. We would like, however, to point out that in this case you cannot use the map function anymore.

This website also uses Google Custom Search, a service of Google Inc. When you search on this site, your search query is sent to Google and the search results are generated by Google. In generating the search results, Google may gather information such as your IP address, web browser version, operating system and similar.

More details regarding the data protection by Google are available at

<https://policies.google.com/privacy?hl=en>

[https://www.google.com/intl/en\\_en/help/terms\\_maps.html](https://www.google.com/intl/en_en/help/terms_maps.html)

## **FACEBOOK PIXEL**

With your approval we use the so-called “Facebook-Pixel” of the social network Facebook due to our legitimate interests concerning the analysis and optimisation of our web presentation.

The operating company of Facebook is Facebook, Inc. 1 Hacker Way, Menlo Park, CA 94025, U.S. or within the EU Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. With its help we can follow-up the movements of users after they saw or clicked on a Facebook Ad. That is how we can record the efficiency of Facebook Ads for statistical and market research purposes. The data collected in this way is anonymous, that means we cannot see the personal data of the single users. This data is hence saved and processed by Facebook about which we inform you according to our state of knowledge. Facebook can connect this data with your Facebook account and can use it also for its own marketing purposes (see data usage directive of Facebook:

<https://www.facebook.com/privacy/explanation>). This information can enable Facebook as well as its partners to publish ads on and off Facebook. For these purposes, also a cookie may be saved on your computer.

This consent can only be given by users who are older than 14 years. If you are younger, we ask you to talk to your parents or legal guardians.

## **SOCIAL MEDIA AGGREGATOR**

In the context of our website we use services of walls.io, a service of the Social Software Development GmbH, Andreasgasse 6, Top 1 1070 Vienna. Walls.io is responsible for the collection, storage, presentation and management of data of different Social Media platforms.

The currently valid privacy regulations of walls.io are available at <https://walls.io/privacy>.

## **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **F) FAILURE TO PROVIDE DATA**

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract with you.

## **G) WHO WE SHARE YOUR DATA WITH**

We're serious when we say we're committed to protecting your privacy – we want to earn and maintain your trust, so we do not sell any of your personal data to any third party.

We do, however share your personal data with certain companies who play an essential part in enabling us to provide our products and services to you, such as IT and system administration providers and others who help us run our business. You can rest assured however, that we require all third parties to respect the security of your personal data and to treat it in accordance with the law and we do not allow our third-party service providers to use your personal data for their own

## **H) PROTECTING YOUR DATA**

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

## **I) RETENTION PERIODS**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal or reporting requirements.

## **J) YOUR LEGAL RIGHTS**

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, you can ask us to delete your data: see the section detailing your legal rights below for further information.

- A. the right to be informed about the data we hold on you and what we do with it;
- B. the right of access to the data we hold on you.
- C. the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as ‘rectification’;
- D. the right to have data deleted in certain circumstances. This is also known as ‘erasure’;
- E. the right to restrict the processing of the data;
- F. the right to transfer the data we hold on you to another party. This is also known as ‘portability’;
- G. g) the right to object to the inclusion of any information;
- H. the right to regulate any automated decision-making and profiling of personal data.

In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

You have the following rights in relation to the personal data we hold on you:

If you wish to exercise any of the rights set out above or if you have any questions or a complaint, please contact us.

#### **NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

Alternatively, we may refuse to comply with your request in these circumstances.

#### **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### **TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

#### **K) CONSENT**

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

#### **L) MAKING A COMPLAINT**

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House,

Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

**M) DATA PROTECTION COMPLIANCE**

Our appointed compliance officer in respect of our data protection activities is Matthew Woolhouse.