

Document 1: Internal Data Protection Policy

For Internal Staff, Contractors, and Self-Employed Professionals

1. Overview and Purpose

Wonderland Hair & Beauty By Alice (WHABBA) is committed to protecting the privacy, confidentiality, and security of all personal data processed during our business operations. This policy ensures compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Data Use and Access Act.

2. Scope and Application

This policy applies to all processing of personal data carried out by WHABBA. It is a condition of employment/engagement that all employees, self-employed hair/beauty/wellness professionals, subcontractors, consultants, and external business partners adhere strictly to this policy when acting on behalf of or collaborating with WHABBA.

3. Data Protection Principles

All personal data must be handled in accordance with the seven core principles of the UK GDPR:

- **Lawfulness, Fairness, and Transparency:** Data must be processed legally and transparently.
- **Purpose Limitation:** Data must only be collected for specified, explicit, and legitimate purposes.
- **Data Minimisation:** Only data necessary for the intended purpose may be collected.
- **Accuracy:** Reasonable steps must be taken to ensure data is accurate and kept up to date.
- **Storage Limitation:** Data must not be kept longer than necessary for its designated purpose.
- **Integrity and Confidentiality:** Data must be processed securely using appropriate technical and organisational measures.
- **Accountability:** WHABBA must be able to demonstrate compliance with all the above principles.

4. Categories of Data Processed

WHABBA collects and processes:

- **Standard Personal Data:** Names, telephone numbers, home addresses, email addresses, payment/financial details, transaction histories, and digital footprints (IP addresses/session data).
- **Special Category Data:** Health data, including client medical histories, skin sensitivities, allergies, contraindications, and patch-test results. *Note: Special category data requires extra technical protection and strict access controls.*
- **Staff/Subcontractor Data:** Employment histories, payroll information, tax statuses, and National Insurance numbers.

5. Internal Operational Security Measures

To maintain data integrity and prevent unauthorised access, all personnel must enforce the following security practices:

- **Access Control:** Access to sensitive client folders and booking system databases is strictly restricted to authorised personnel who require the data to perform their immediate duties.
- **Physical Security:** Any paper records (e.g., historical client consultation cards, physical sign-in sheets) must be stored in secure, locked filing cabinets when not in use. A strict "clear desk" policy applies at the salon reception.
- **Secure Disposal:** All physical documents containing personal or financial information must be cross-cut shredded immediately upon reaching their retention limit.
- **Digital Protections:** All devices used to access WHABBA data must be password-protected, utilise Multi-Factor Authentication (MFA) where available, and operate on secure, encrypted networks. Informal communication of client data via personal messaging apps or unsecured channels is strictly prohibited.
- **Data Backups:** Regular, encrypted electronic backups of all operational booking and financial databases must be securely maintained.
- **Third-Party Processors:** Data processing contracts must be maintained with all external software vendors (including Wix.com) to guarantee that remote hosting and processing align fully with UK data protection laws.

6. Data Breach Management and Reporting

A data breach occurs when personal data is accidentally or unlawfully lost, altered, destroyed, disclosed, or accessed without authorization.

- **Internal Reporting:** Any employee or subcontractor who discovers or suspects a data breach must report it immediately to management.

- **Statutory Notification:** If a breach poses a risk to the rights and freedoms of individuals, WHABBA will notify the Information Commissioner's Office (ICO) within **72 hours** of becoming aware of the breach. Affected individuals will be notified without undue delay if the breach presents a high risk to their privacy.

7. Staff Training and Compliance

WHABBA will conduct periodic data protection training and risk assessments. Training will cover data security, online privacy measures, and the process of obtaining and documenting valid customer consent.

8. Disciplinary Consequences

Adherence to this policy is mandatory. Any material breach of these data protection guidelines will investigate and invoke internal disciplinary procedures, which may result in termination of employment, termination of contractual agreements for self-employed partners, or legal action.

Document 2: Customer Privacy Notice & Cookie Policy

Public-Facing Document for Website, Booking Portals, and Salon Display

Last Updated: October 2026

At **Wonderland Hair & Beauty By Alice (WHABBA)**, we treat your personal information with the utmost care, confidentiality, and respect. This Privacy Notice explains how we collect, store, use, and safeguard your data when you visit our website, book a service, or visit our salon.

1. Who We Are (Data Controller)

Wonderland Hair & Beauty By Alice (WHABBA)

Address: 1, Police Houses, Gateshead Road, Streetgate, Sunniside, Newcastle upon Tyne, NE165LG

Email: wonderlandhairbyalice@outlook.com

2. The Types of Information We Collect

We receive, collect, and store information you enter on our website or provide to us directly during consultations, bookings, or transactions. This includes:

- **Identity and Contact Data:** Your name, email address, phone number, and physical address.
- **Financial and Transaction Data:** Purchase histories, billing details, and payment card details (processed securely via PCI-DSS compliant providers).
- **Technical and Usage Data:** Internet Protocol (IP) addresses, website login credentials, device connection details, and browser session information (page response times, length of visits, and page interactions).
- **Special Category (Health) Data:** Information regarding your health, allergies, skin sensitivities, medical conditions, and mandatory patch-test results necessary to safely perform chemical or technical treatments.

3. How and Why We Use Your Personal Data

Under UK data protection law, we must have a valid legal basis to process your data. We do not rely solely on consent. We map our data processing to the following lawful grounds:

Purpose / Activity	Type of Data	Lawful Basis for Processing
Booking & Service Delivery: Registering your client profile, scheduling appointments, and managing cancellations.	Identity, Contact, Technical	Contractual Necessity: We cannot fulfil your booking or provide our services without this data.
Treatment Safety: Executing chemical patch tests and evaluating skin/hair health suitability.	Special Category (Health Data)	Explicit Consent / Legal Obligations: Required to satisfy medical safety standards and commercial business insurance mandates.
Payment Processing: Processing client invoices, taking deposits, and preventing fraudulent transactions.	Identity, Financial, Transaction	Contractual Necessity & Legitimate Interests: To secure payment and protect against financial fraud.
Marketing Communications: Sending newsletters, seasonal promotions, or styling updates.	Identity, Contact	Consent: You can withdraw your consent and opt out at any time.
Business Records & Taxation: Retaining invoices, booking histories, and accounting data.	Identity, Transaction, Financial	Legal Obligation: Statutory requirement to retain tax records for HMRC.

4. How Your Data is Collected

- **Direct Interactions:** You provide your information by filling out web forms, booking an appointment, signing up for marketing, or completing a consultation card in the salon.
- **Automated Technologies:** As you navigate our website, we automatically collect Technical Data about your equipment and browsing patterns using cookies and tracking software.

5. Data Storage, Hosting, and International Transfers

Our website and digital infrastructure are hosted on the **Wix.com** platform. Wix.com provides the online platform that allows us to manage bookings and sell our products and services.

- **Security:** Your data is stored through Wix.com's secure data applications behind robust firewalls. All direct payment gateways adhere to the standards set by **PCI-DSS** (managed by the PCI Security Standards Council), ensuring secure handling of credit card data.
- **International Data Transfers:** Wix.com operates globally and may store or process your data outside the United Kingdom (predominantly in the United States or European Union). Where data is transferred outside the UK, it is protected by appropriate legal safeguards, including Standard Contractual Clauses (SCCs) and the UK Extension to the EU-US Data Privacy Framework, ensuring a level of data protection equivalent to UK law.

6. Data Retention: How Long We Keep Your Data

We only keep your personal data for as long as necessary to fulfill the purposes we collected it for, including satisfying any legal, accounting, or insurance reporting requirements.

- **Client Consultation & Treatment Records:** Retained for **7 years** from the date of your last salon treatment to comply with UK beauty industry insurance mandates.
- **Financial and Transaction Records:** Retained for **6 years** from the end of the current financial year to satisfy HMRC tax regulations.
- **Marketing Data:** Kept until you choose to opt out, or after **24 months** of total commercial inactivity.

7. Your Statutory Legal Rights

Under UK data protection laws, you have specific rights regarding your personal information:

- **Request Access:** You have the right to request a copy of the personal data we hold about you.
- **Request Correction:** You can request that we rectify any incomplete or inaccurate data.
- **Request Erasure (Right to be Forgotten):** You can ask us to delete your data. *Please note: We cannot delete data that we are legally required to retain for HMRC tax purposes or insurance compliance.*
- **Object to or Restrict Processing:** You can object to us processing your data for direct marketing, or restrict how we use it.
- **Withdraw Consent:** Where we rely strictly on your consent to process data (such as marketing), you can withdraw it at any time.

To exercise any of these rights, please contact us at **wonderlandhairbyalice@outlook.com** or write to us at our postal address listed in Section 1.

8. How to Complain

If you are unhappy with how we handle your data, please contact us directly so we can resolve the issue. You also have the right to lodge a formal complaint at any time with the UK supervisory authority, the **Information Commissioner's Office (ICO)**, via their website: ico.org.uk.

9. Cookie Policy (Website Integration)

Our website uses cookies to monitor performance, optimize user experience, and ensure security.

What are Cookies?

Cookies are small text files placed on your device by websites that you visit. They are widely used to make websites work efficiently and provide analytical insights to website owners.

The Cookies We Use

- **Essential/Necessary Cookies:** These cookies are vital for system security, user authentication, and core functionality—such as keeping your online shopping cart updated or maintaining your secure booking session. The site cannot function properly without them.
- **Analytical/Performance Cookies:** Powered by our platform infrastructure (Wix.com), these allow us to recognise and count website visitors, measure page response times, tracking how long users spend on certain pages, and see how visitors move around our site. This helps us improve our digital experience.

- **Marketing/Targeting Cookies:** These cookies record your visit to our website, the pages you have visited, and the links you have followed to ensure any future promotions or notices are relevant to your interests.

Managing Your Cookie Preferences

When you first visit our website, a cookie consent banner will appear. You can choose to accept all cookies, decline non-essential cookies (analytical and marketing), or customize your choices. You can also adjust your browser settings to block or delete cookies entirely, though doing so may limit your ability to use certain features on our site.