

KNOCKOUT HAIR

Knockout Hair – Internal Data Handling & CCTV/Audio Recording Policy

Effective Date: 17/01/2023

Review Date: 17/01/2025

1. Purpose

The purpose of this policy is to ensure that all client data at Knockout Hair is handled in compliance with the General Data Protection Regulation (GDPR) and relevant data protection laws, maintaining client privacy, safeguarding sensitive information, and ensuring transparency in our use of CCTV and audio recording systems.

2. Scope

This policy applies to all staff, self-employed stylists, contractors, and anyone accessing client information through the salon systems or premises.

It covers all client data—digital or paper-based—as well as all CCTV and audio recordings made on the premises.

3. Definitions

- **Personal Data:** Any information relating to an identifiable individual, e.g., name, phone number, email, appointment history, or payment details.
 - **Sensitive Data:** Any data that requires additional protection under GDPR, e.g., health-related information or special requirements.
 - **Processing:** Collecting, storing, accessing, or using personal data.
 - **CCTV & Audio Data:** Any video or audio recorded on the salon premises for legitimate business and security purposes.
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4. Principles of Data Handling

All client data (including CCTV/audio data) must be:

1. **Collected lawfully and fairly** – Only collect information necessary for salon services and legitimate business interests.
2. **Used for specific purposes** – Client data may only be used for managing appointments, performing salon services, marketing (with consent), security purposes, dispute resolution, and ensuring service quality.
3. **Limited to necessity** – Only staff or self-employed workers who require access for their role may process client data or access CCTV/audio recordings.
4. **Accurate and up-to-date** – Ensure client information is correct and updated promptly.
5. **Stored securely** – Digital data must be password-protected; paper records locked securely; CCTV/audio recordings securely stored and access-restricted.

6. **Not retained longer than necessary** – Remove or anonymise client data and CCTV/audio recordings once no longer required. Retention periods will be reasonable, proportionate, and stated in the salon’s privacy notice.
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5. Collection and Consent

- Client data is collected during booking or service and may include contact details, hair/skin preferences, and appointment history.
 - Clients must provide explicit consent for marketing communication.
 - Consent must be recorded and can be withdrawn at any time.
 - We do not collect personal data via this website without consent.
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6. CCTV & Audio Recording

6.1 Purpose of CCTV and Audio Recording

The salon operates CCTV with audio recording in designated areas for the following legitimate purposes:

- **Resolving staff disputes** (e.g., disagreements at tills, issues over payments or services).
- **Investigating fraudulent chargebacks** (e.g., claims such as “I never authorised that treatment”).
- **Ensuring service quality** when disputes arise regarding what was said or agreed.
- **Verifying instructions given to clients**, including patch-test guidance, allergy advice, and treatment explanations.
- **General security** of staff, clients, and property.

6.2 Signage

Clear, visible signage will be placed at all entrances and within monitored areas stating:

“CCTV with video and audio recording in operation.”

6.3 Access to Recordings

- Only authorised management may access CCTV/audio recordings.
- Recordings will not be shared externally unless necessary for:
 - legal claims,
 - disputes involving payments or treatments,
 - police investigations,
 - GDPR-compliant requests.
- Staff and self-employed stylists must not access or share recordings for personal reasons.

6.4 Retention

Recordings will be stored securely and retained only for the minimum period necessary to fulfil the purposes listed above.

7. Access and Use

- Staff & self-employed stylists: Access to client data is limited to salon-authorised systems only.
 - Personal devices: Client data must never be stored on personal devices, such as phones, tablets, or computers.
 - External use: Client information cannot be used for personal business, soliciting clients, or sharing outside the salon without explicit consent.
 - Communication: Staff must not contact clients regarding appointments, services, or promotions without using approved salon channels or obtaining consent.
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8. Appointments and Relocation

- Clients must always be informed of changes to their appointments via approved salon communication channels.

- Any relocation or transfer of appointments must only occur with client consent and under salon supervision.
 - Staff must not encourage clients to transfer to external businesses while operating under salon premises.
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9. Data Security

- Digital systems must have strong passwords, two-factor authentication where possible, and access restricted by role.
 - Paper records must be locked securely when not in use.
 - CCTV/audio recordings must be stored securely with controlled access.
 - Data breaches or unauthorised access must be reported immediately to management.
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10. Staff & Self-Employed Responsibilities

- Read and understand this policy.
 - Never access client data or CCTV/audio recordings for personal use.
 - Report any data breaches or suspected misuse immediately.
 - Follow GDPR and all internal procedures.
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11. Breach of Policy

Any breach of this policy may result in:

- Formal warnings
 - Restricted access to client data or CCTV/audio systems
 - Termination of self-employed agreements or employment
 - Legal action in the event of GDPR violations
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12. Review

This policy will be reviewed annually, or sooner if required by law or changes to salon operations.

Approval:

Kirsten Graham

17/01/2025

Companies House Number: 14389521