



Knockout Hair – Internal Data Handling 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, and safeguarding sensitive information.

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 collected, stored, or processed by the salon, whether digital or paper-based.

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.

4. Principles of Data Handling

All client data must be:

1. **Collected lawfully and fairly** – Only collect information necessary for salon services.
2. **Used for specific purposes** – Data may only be used for managing appointments, performing salon services, marketing (if consent is given), and contacting clients about salon matters.
3. **Limited to necessity** – Only staff or self-employed workers who require access for their role may process client data.
4. **Accurate and up-to-date** – Ensure client information is correct and promptly update any changes.

5. **Stored securely** – Digital data must be password-protected; paper records must be locked securely.
6. **Not retained longer than necessary** – Remove or anonymize client data that is no longer required.

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 any marketing communication.
- Consent must be recorded and can be withdrawn at any time.

6. Access and Use

- **Staff & self-employed stylists:** Access to client data is limited to salon-authorized systems only.
- **Personal devices:** Client data must **never** be stored on personal 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.

7. 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.

8. Data Security

- Digital systems must have strong passwords, two-factor authentication where possible, and access restricted by role.
- Paper records must be locked in secure storage when not in use.
- Data breaches or unauthorized access must be reported immediately to management.

9. Staff & Self-Employed Responsibilities

- Read and understand this policy.
- Never access client data for personal or external purposes.
- Report any data breaches or suspected misuse immediately.
- Follow GDPR and all internal procedures.

10. Breach of Policy

Any breach of this policy may result in:

- Formal warnings
- Restricted access to client data
- Termination of self-employed agreements or employment
- Legal action in the event of GDPR violations

11. Review

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

Approval:

Kirsten Graham

17/01/2025