

## Camden Skincare Ltd t/a Ceuti Derma - Privacy Notice

We at Camden Skincare Ltd understand that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of our Clients and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

### 1. Information About Us

Camden Skincare Ltd, trading as Ceuti Derma, is a limited company registered in England under company number 14026213.  
Registered address: 80 Compair Crescent, Ipswich, Suffolk, England, IP2 0EH.  
Main trading address: 13 Brecknock Road, Camden N7 0BL.  
Representative: Selam Tesfamichael.  
Email address: info@ceutiderma.london.  
Telephone number: 0203 343 3499.

### 2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

### 3. What Is Personal Data?

- 3.1 Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.
- 3.2 Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.
- 3.3 The personal data that we use is set out in Clause 5, below.

### 4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- 4.1.1 The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Clause 11.
- 4.1.2 The right to access the personal data we hold about you. Clause 10 will tell you how to do this.
- 4.1.3 The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Clause 12 to find out more.
- 4.1.4 The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Clause 12 to find out more.
- 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data.
- 4.1.6 The right to object to us using your personal data for a particular purpose or purposes.
- 4.1.7 The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- 4.1.8 The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- 4.1.9 Rights relating to automated decision-making and profiling. Clause 6 explains more about how we use your personal data, including automated decision-making and/or profiling.
- 4.2 For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Clause 12.
- 4.3 It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.
- 4.4 Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.
- 4.5 If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Clause 12.

### 5. What Personal Data Do You Collect and How?

- 5.1 We may collect and hold some or all of the personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data **OR** personal data relating to children **OR** data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Identity Information including first name, last name, title, username or similar identifier.	Directly from you or via the website
Contact information including billing address, site address, email address, and telephone numbers.	Directly from you or via the website
Financial information including bank account and payment card details.	Directly from you or a third-party payment processing website such as Stripe
Transaction information including details about payments to and from you, and other details of services you have purchased from us.	Directly from you, or third-party processing software such as Xero
Technical information including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this Site.	Via the website
Profile information including your username and password, your interests, preferences, feedback and survey responses.	Via the website

Usage information including information about how you use our Site and services.	Via the website
Marketing and Communications information including your preferences in receiving marketing from us and our third parties, and your communication preferences.	Directly from you or via the website

## 6. How Do You Use My Personal Data?

6.1 Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Administering our business.	Identity Data, Contact Data and Financial Data	Contract, Legitimate Interest, Consent
Supplying our products and/or services to you.	Identity Data, Contact Data and Financial Data	Contract, Legitimate Interest, Consent
Managing payments for our products and/or services.	Identity Data and Financial Data	Contract, Legitimate Interest, Consent
Personalising and tailoring our products and/or services for you.	Identity Data, Contact Data, Profile Data and Marketing and Communications Data	Contract, Legitimate Interest, Consent
Communicating with you.	Identity Data and Contact Data	Contract, Legitimate Interest, Consent
Supplying you with information by email and/or post that you have opted-in-to (you may opt-out at any time).	Identity Data and Contact Data	Contract, Legitimate Interest, Consent

6.2 With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or text message and/or post with information, news, and offers on our products and/or services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

6.3 We use the following automated system(s) for carrying out certain kinds of decision-making and/or profiling. If at any point you wish to query any action that we take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the Data Protection Legislation gives you the right to do so. Please contact us to find out more using the details in Clause 12.

6.4 We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish for us to explain how the new purpose is compatible with the original, please contact us using the details in Clause 12.

6.5 If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

6.6 In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 7. How Long Will You Keep My Personal Data?

7.1 We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information including first name, last name, title, username or similar identifier.	6 years
Contact information including billing address, site address, email address, and telephone numbers.	6 years
Business information including business name and business address.	6 years
Financial information including bank account and payment card details.	Until the transaction is complete
Profile information including, preferences and interests, purchase history.	6 years

## 8. How and Where Do You Store or Transfer My Personal Data?

8.1 We will only store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

8.2 We may store some of your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.

8.3 We may store some or all of your personal data in countries outside of the UK. These are known as "third countries". We will take additional steps to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

- 8.3.1 We ensure that your personal data is protected under binding corporate rules. Binding corporate rules are a set of common rules which all our group companies are required to follow when processing personal data. For further information, please refer to the [Information Commissioner's Office](#).
  - 8.3.2 We will only store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy decisions and adequacy regulations, please refer to the [Information Commissioner's Office](#).
  - 8.3.3 We will use specific approved contracts which ensure the same levels of personal data protection that apply under the Data Protection Legislation. For further information, please refer to the [Information Commissioner's Office](#).
  - 8.3.4 Please contact us using the details below in Clause 12 for further information about the particular data protection safeguard(s) used by us when transferring your personal data to a third country.
- 8.4 The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:
- 8.4.1 limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
  - 8.4.2 procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so;

## **9. Do You Share My Personal Data?**

- 9.1 We may sometimes contract with other third parties to supply services to you on our behalf, such as sub-contractors, and in some cases, these third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.
- 9.2 We will not share any of your personal data with any third parties for any purposes, subject to the following exception(s).
- 9.3 If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.
- 9.4 In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.
- 9.5 If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Clause 8.
- 9.6 If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Clause 8.
- 9.7 If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.
- 9.8 In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## **10. How Can I Access My Personal Data?**

- 10.1 If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".
- 10.2 All subject access requests should be made in writing and sent to the email or postal addresses shown in Clause 12.
- 10.3 There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.
- 10.4 We will respond to your subject access request within 5 working days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## **11. Our Use of Cookies**

- 11.1 All Cookies used by and on our Site are used in accordance with current Cookie law.
- 11.2 We may place and access the following first party and third-party Cookies on your computer or device, to facilitate and improve your experience of our Site and to provide and improve our services:
- 11.3 First party Cookies are those placed directly by us and are used only by us. Third party Cookies are those placed by websites, services, and/or parties other than us. These Cookies are not integral to the functioning of our Site and your use and experience of our Site will not be impaired by refusing consent to them.
- 11.4 Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of our Site may not function fully or as intended.
- 11.5 Certain features of our Site depend on Cookies to function. Cookie Law deems these Cookies to be "strictly necessary". These Cookies are also shown above. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser's settings as detailed in clause 11.2, but please be aware that our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.
- 11.6 Our Site uses Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how our Site is used. This, in turn, enables us to improve our Site and the services offered through it. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of our Site, it does enable us to continually improve our Site, making it a better and more useful experience for you. Google's privacy policy is available at: [www.google.com/policies/privacy](http://www.google.com/policies/privacy)
- 11.7 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access our Site more quickly and efficiently.
- 11.8 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

## **12. How Do I Contact You?**

- 12.1 To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Selam Tesfamichael):
  - 12.1.1 Email address: [info@ceutiderma.london](mailto:info@ceutiderma.london).
  - 12.1.2 Telephone number: 0203 343 3499.
  - 12.1.3 Postal Address: 13 Brecknock Road, Camden N7 0BL.

## **13. Changes to this Privacy Notice**

- 13.1 We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.
- 13.2 Any changes will be made available on our Site. This Privacy Notice was last updated in April 2023.