



SALONGENIUS Privacy Statement

Your privacy is important to us. This statement explains what personal data SALONGENIUS as a Company collects from our Customers, how we use that data and your rights regarding that data.

Mascolo Support Systems Limited t/a SALONGENIUS are the data controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below or by using our [Web form](#).

Our full details are:

Full name of legal entity: Mascolo Support Systems Ltd t/a SALONGENIUS

Company Number: 03395996

FAO: Data Privacy Manager

Email address: support@salongenius.com

Postal address: 6 Dean Park Crescent, Bournemouth, BH1 1HL

Telephone Number: 01202 311826

This Statement includes the following sections:

- [What Personal Data We Collect](#)
- [How We Use Personal Data](#)
- [Access to Your Personal Data](#)
- [Sharing Your Personal Data](#)
- [Security of Personal Data](#)
- [Retention of Personal Data](#)

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 24 May 2018.

We reserve the right to amend this privacy statement at any time. Any changes we may make to our statement in the future will be posted on this page and, where appropriate, notified to you by email or post.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

What Personal Data We Collect and How We Collect It



Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

This privacy statement aims to give you information on how we collect and process the personal data you provide when you:

- visit our websites (regardless of where you visit it from);
- purchase one of our products or services; or
- sign up to our promotional communications

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

Name and contact data includes your title, first and last name, email address, postal address, phone numbers, and other similar contact data, including your preferred method of contact and similar permissions.

Demographic data includes information such as your country and preferred language.

Payment data includes the necessary data to process your payment. Please note, we do not store any payment data.

Online Credentials data includes passwords, password hints, and similar security information used for online authentication and account access.

Device and Usage data. We collect data about your device and how you and your device interact with SALONGENIUS in the use of our products. This includes:

- **Support Troubleshooting and Help data.** When you engage SALONGENIUS for support troubleshooting and help, we collect data about the caller and the hardware, software, and other details related to the incident. Such data includes contact data, the content of conversations, chats and other communications with SALONGENIUS, data about the condition of the machine and the application when the fault occurred and during diagnostics, and system and registry data about software installations and hardware configurations.
- **Device, connectivity and configuration data.** We collect data about your device and the network you use to connect to our products. It includes data about the operating systems and other software installed on your device, including product keys. It also includes IP address, device identifiers, regional and language settings.
- **Error reports and performance data.** We collect data about the performance of our products and any problems you experience with them. This data helps us to diagnose problems in our products you use, and to improve our products and provide solutions. Depending on your product and settings, error reports can include data such as the type or severity of the problem, details of the software or hardware related to an error, contents of files you were using when an error occurred, and data about other software on your device.

Content data includes information you provide to us and the content of messages you send to us, such as web leads requests, telephone voicemails, emails, feedback and product reviews you write.

Data from Third Parties We may receive personal data about you from various third parties as set out below:

- Data brokers from which we purchase demographic data and/or mailing lists to supplement the data we collect.
- Social networks when you interact with our public social networks such as Facebook.
- Partners with which we offer co-branded services or engage in joint marketing activities, and
- Publicly-available sources such as open government databases or other data in the public domain.

Promotional Communications data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy statement.

We do not collect any special categories of personal data about you. Nor do we collect any information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How We Use Personal Data

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 we need to perform the contract we are about to enter into or have entered into with you.
- 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.

Click [here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than to send marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us using the details above.

Purpose/Activity and Types of Data Used	Lawful basis for processing including basis of legitimate interest
To register you as a new customer <i>Data: Name and Contact data and Online Credential data</i>	Performance of a contract with you
To provide you with your order or service which includes: (a) Activate products purchased (b) Manage payments, fees and charges (c) Collect and recover money owed to	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Necessary for your legitimate interests (to ensure that we provide you with a secure service)



<p>us</p> <p>Data: Name and Contact data, Payment data, Online Credentials data and Device & Usage data</p>	
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy notice</p> <p>(b) Asking you to leave a review or take a survey</p> <p>Data: Name and Contact data, Device, Connectivity and Configuration data and Contents data</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To provide you with support when using our products or services, namely:</p> <p>(a) To diagnose product problems and repair your device when necessary</p> <p>(b) To repair your device when you experience problems</p> <p>Data: Name and Contact data, Online Credentials data, Device and Usage data and Content data</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To provide you with updates and improve the products and services you use including:</p> <p>(a) Update you when your subscription expires</p> <p>(b) Improving the performance of existing products</p> <p>(c) Updating you when new features or capabilities have been introduced</p> <p>Data: Online Credentials data, Device and Usage data and Content data</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p> <p>(c) Necessary for your legitimate interests (to ensure that we provide you with a secure service)</p>
<p>To administer and protect you when you use our products and services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p> <p>(a) To confirm the validity of software</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p> <p>(c) Necessary for your legitimate interests (to</p>



<p>licenses</p> <p>(b) To update security features and products</p> <p>(c) To detect and prevent fraud</p> <p>Data: Name and Contact data and Device and Usage Data</p>	<p>ensure that we provide you with a secure service)</p> <p>(d) Necessary to comply with a legal obligation</p>
<p>To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p> <p>Data: Name and Contact data and Support Troubleshooting and Help data</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p> <p>Data: Name and Contact data, and Promotional Communications data</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p> <p>Data: Demographic data, Online Credentials data and Device and Usage data</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p> <p>Data: Name and Contact data, Promotional Communications data</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. To stop receiving any promotional communications from us, please either;

- follow the unsubscribe link at the bottom of every email;
- reply 'STOP' to 60777 to the SMS communication you receive from us; or
- contact us on the details above.

Please note that you may still receive some marketing messages for a short period after you have updated your



marketing preferences, while our systems are fully updated. After that, please note that you will still receive information and service updates.

COOKIES

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 this website may become inaccessible or not function properly.

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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using the details above.

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.

Access to Your Personal Data

You have choices and rights about the personal data we collect and use. A summary of your rights include:

- You have the right to withdraw consent to our processing your personal data at any time.
- You also have the right to your personal data being corrected, erased, transferred and/or restricted in its processing at any time.
- You have the right to see all the personal data we hold for you at any time through our normal subject access procedures.
- You have the right to lodge a complaint with a supervisory authority

If you wish to exercise any of the rights set out above, please just contact us.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

We will respond to all legitimate questions or concerns 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.

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.



Sharing Your Personal Data

We may have to share your personal data with the following external third parties set out below for the purposes set out in the section 'How We Use Personal Data' above.

- Service providers such as hardware suppliers, software suppliers, goods delivery operators, alternative finance providers
- Partners with which we offer co-branded services
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances
- Marketing platforms to send out promotional communications to you
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy statement.

SALONGENIUS does not share any personal data with third parties for direct marketing purposes.

Security of Personal Data

SALONGENIUS is committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorized access, use or disclosure.

For example, we store the personal data you provide on a Microsoft cloud-based Dynamics 365 Customer Relationship Management system, which employs role-based access and security.

For further information regarding the compliance, security and Privacy of Dynamics 365 please refer to <https://www.microsoft.com/en-us/trustcenter/cloudservices/dynamics365>

Access to Company computer systems requires individual security and further access to use Dynamics 365 to access personal data requires additional individual security. All computers are maintained in controlled offices.

Structured manual personal data is held securely, scanned electronically for secure storage and then destroyed unless the original is required for legal purposes.

If there is a need to transmit highly confidential data over the Internet, we protect it through the use of encryption.

We do not transfer your personal data to a third country.

We will notify you and any applicable regulator of a breach where we are legally required to do so.

Retention of Personal Data

SALONGENIUS retains personal data for as long as necessary to fulfil the purposes we collected it for,



including for the purposes of satisfying any legal, accounting, or reporting requirements.

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.

Details of retention periods for different aspects of your personal data are as follows:

- Your personal data will be retained and updated while you remain a customer of **SALONGENIUS**, to maintain and improve the performance of your services and products, providing appropriate customer service support, and to comply with our legal obligations. After you cease to be a customer we will still retain some of your details to ensure that we comply with our legal obligations and legitimate business interests.
- When your Software Support Agreement expires, basic personal data will be retained to enable your software Licence to continue operation within the limitations of that Licence. Only if you notify us that you have ceased using our software, will we erase your Licence and the personal data held with it.

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.