



PRIVACY POLICY

**Confidentiality
& Data Protection**

CONFIDENTIALITY & DATA PROTECTION POLICY

Victoria's Aesthetics is committed to protecting the privacy and confidentiality of all patient information, adhering to all applicable data protection regulations. This policy outlines the procedures all staff must follow to ensure the secure handling and storage of patient records and sensitive details related to aesthetic treatments.

This policy applies to all staff members, with access to patient information within Victoria's Aesthetics.

As a nurse led clinic, we have a duty of confidentiality to all those who are receiving our care. This includes making sure that they are informed about their care and that information about them is shared appropriately. Confidentiality is in line with The Code from NMC of Professional Standards.

We will only use your personal data where we have a lawful basis to do so. The lawful purposes that we rely on under this Privacy Policy are:

- Consent (where you choose to provide it);
- Performance of our contract with you;
- Compliance with legal requirements; and

Written and verbal consent is required prior to any and every treatment and this includes treatment consent as well as opting to share your medical photographs (in clinic/on the website/social media). This includes sharing the options of sharing photos with full face/anonymised/close up showing the treatment area only.

You also have the right at any time to require that we delete the personal data that we hold for you, where it is no longer necessary for us to hold it. However, whilst we respect your right to be forgotten, we may still retain your personal data in accordance with applicable laws.

Where personal, sensitive details and information are communicated by the patient over other channels rather than face to face in clinic, i.e. Whatsapp, the confidentiality is protected by Whatsapp.

- WhatsApp uses Signal encryption to protect the content of messages.
- WhatsApp doesn't keep logs of who people message or call.
- WhatsApp doesn't share contact lists with other apps.
- WhatsApp doesn't share location information with others unless the user turns on location sharing in chats.
- WhatsApp has a Law Enforcement Response Team (LERT) that reviews government requests for user data.

We are committed to exceeding patient expectations and providing the highest quality medical aesthetic care in a safe and comfortable environment.

We strive to continuously improve our services and stay at the forefront of the industry by embracing innovation and the latest advancements in medical aesthetics.

Victoria's Aesthetics is committed to protecting the privacy and security of personal data and patient confidentiality. This policy outlines how we collect, use, store, and disclose personal information in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

This policy applies to all personal data processed by Victoria's Aesthetics, including information collected from patients, staff, and third parties.

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Pixie Victoria Sayers at Victoria's Aesthetics, The Beauty Boutique, 7A Roe Street, Macclesfield, Cheshire, SK11 6UT is the data controller responsible for determining the purposes and means of processing personal and sensitive data.

We may collect the following personal information via Glowday and our own means:

- Basic information: Name, address, contact details (email, phone number).
- Medical information: Medical history, allergies, current medications, treatment history.
- Images: Before and after treatment photos (with consent).
- Financial information: Payment details for treatments.
- Marketing information: Preferences for receiving marketing communications.

We will only process personal data where we have a lawful basis to do so, including:

- Consent: For specific treatments, for sharing of before and after photos/videos or marketing communications.
- Contract: To provide treatment and services.
- Legitimate interests: To improve our services and protect our business.
- Legal obligation: To comply with medico-legal and insurance requirements.

We may share personal data with:

- Healthcare professionals: Including, but not limited to, your GP. For treatment purposes, consultations or in the event of a complication or emergency situation.
- Insurance providers: For claims or verification purposes.
- Third-party service providers: For data processing or marketing services (with appropriate data protection agreements).
- Law enforcement agencies: If required by law.

We use Glowday for our appointment booking system at Victoria's Aesthetics; to collect and protect your personal and sensitive data. You can find out more about how Glowday stores and protects your data. GlowdayPRO is web-based software which combines diary, forms, online booking, reminders, payments, patient records, verified review collection and marketing for medical aesthetic practitioners. Glowday is a platform where patients can book appointments with their preferred practitioner.

Glowery Ltd is the registered company for both Glowday and GlowdayPRO. Glowery Ltd conforms to the General Data Protection Regulations 2016, the Data Protection Act 2018 and any other legislation or regulations that relate to the processing of Personal Data. Patients provide their personal information, sensitive health information and payment information when they book/confirm treatments via Glowday.

Patients can create a verified secure Patient Account Area in order to provide personal, sensitive and payment information. Personal and sensitive data (Patient Data) remains the exclusive property of the patient.

Victoria's Aesthetics is considered a data processor for the purposes of conducting the aesthetic treatment.

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Where the patient doesn't wish to create a secure digital Patient Account Area, the practitioner can create an offline account for the patient and collect the patient's personal and sensitive information. This information will only be available to view within the Patient Record within the Practitioners account.

Should the patient wish, they can retrospectively create an online account, so that they are able to have full visibility and control of their data.

Patient data will be held by Glowery Ltd in order for Victoria's Aesthetics to continue to perform treatments and maintain a historical record. Glowery Ltd will maintain access to historic Patient Data where matters of insurance require its use for up to a period of ten years. Victoria's Aesthetics can access patient data for this period of time.

Clinics acting as a data recipient and processor of Patient Data (through GlowdayPRO), must treat the data responsibly and in full accordance with the latest legislation.

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Patients can request that their personal data be removed from the platform and can request to archive their Glowday Account. This will remove all data from The Platform, other than that held in patient records for medico-legal purposes.

Patient data held by Glowery Ltd can only be accessed by the patient via their verified, password-protected, two-factor authentication (2FA) secure account and by the practitioner via their verified, password-protected secure account.

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Log in is handled by Microsoft Azure B2C. Glowery Ltd doesn't have access to practitioner or patient login credentials.

Data "in transit" between the patient account and the practitioner account is encrypted during transit to ensure secure transfer. Sensitive patient data is not sent via email or other non-secure methods.

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Data "at rest", i.e. once forms/patient notes/file uploads/photos have been completed, is stored anonymised and encrypted in FIPS 140-2 Level 2 compliant HSMs. Data is stored in EU Microsoft Cloud Servers. No data is held on local servers.

When a practitioner hands a device to a patient to digitally sign forms, the platform must be locked by the practitioner, preventing the patient accessing any data that isn't their own.

Payments are handled solely by Stripe (<https://stripe.com/gb>). No patients payment/card data is held by Glowery Ltd. Any concerns relating to the processing of patient data should be sent to support@glowday.com.

We retain personal data for as long as necessary to fulfil the purposes for which it was collected. Historic patient data will be stored for up to ten years for insurance purposes.

Individuals have the following rights:

- Right to access personal data
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object to processing
- Rights related to automated decision-making and profiling

If you have any concerns about how we handle your personal data, please contact us. We are registered with the Information Commissioner's Office. You also have the right to lodge a complaint with the ICO.

If you want to make a complaint against Victoria's Aesthetics, please see the Complaints Policy.

This policy was revised in February 2025. We may update this policy at any time. Any changes will be posted on our website.