

## **PRIVACY STATEMENT ASMR HEAD SPA ACADEMY**

ASMR Head Spa Academy values your privacy. I will process and use your data in a secure manner, fully in accordance with the General Data Protection Regulation (GDPR). In this privacy statement, I will explain which data I collect from you and why I do so. You can also read about your rights regarding this data processing. For questions about your privacy, you may contact me at [info@asmrheadspa.nl](mailto:info@asmrheadspa.nl).

### **Article 1: Who am I?**

ASMR Head Spa Academy is a sole proprietorship, located at Oranjeweg 13F, (6991WG) Rheden, Netherlands. I am registered with the Dutch Chamber of Commerce under number 83370447. I am the controller of your personal data.

### **Article 2: What data do I use?**

Here you can find an overview of the data I process from you, why I do so, the legal basis for processing this data, and how long I will retain it.

As a participant of the academy, I process your name, company name (if applicable), address, gender, email, phone number, and other data necessary to optimally deliver my services to you.

As a client in the salon, I process your name, address, email, phone number, and information you provide on the intake form, including medical information. I may also request your identification to verify your age.

I use this data to ensure you are a satisfied customer during the term of our agreement. I will delete your data 1 year after the end of our agreement.

To manage your order, I will retain your name, billing address, email, phone number, purchase history or appointment history, and payment details in my customer database for 7 years after the agreement is concluded. I do this for the purpose of executing and potentially amending the agreement, as well as for the Tax Authorities.

If you happen to have a complaint about my services, I will process your name, email, any account number or order number, phone number, and the content of and communication about this complaint to reach the best possible solution for you. I use this data for the optimal execution of the agreement. I will delete data related to complaints 1 year after resolution.

I have a commercial interest in using some of your personal data for marketing purposes. I process your name and email for direct marketing. I will delete this data as soon as you unsubscribe from the newsletter or indicate that you no longer wish to be contacted by me.

To make this website functional and optimized, I use analytics and retargeting services. I have a commercial interest in using your browsing behavior and related data to analyze and improve my services where necessary. I will track your use of my website with Google Analytics and a Meta pixel, and I am bound by the retention periods of these parties.

These services use cookies. Cookies are small pieces of information sent to your browser when you visit my website and are then stored on the hard drive or memory of the device you use to access my website. These cookies will not damage your devices. You can read more about this in my cookie statement.

When you wish to contact me via the website, I ask for your name and email address. By submitting the form, this information becomes visible to me so that I can respond to your inquiry. I will delete this data once the inquiry is resolved, unless it leads to an agreement.

To enable the posting of reviews about my services, I process your name and the content of your message. By writing your review, this data becomes visible to me. I may place reviews about my services on my website and social media channels for commercial purposes. I will delete these reviews when they are no longer representative of my services or upon your request for removal.

When you sign up for one of my webinars, trainings, or free products, I ask for your name and email address. This allows me to grant you access to the relevant content and provide additional information about the discussed topic if needed. I will delete this data after the completion of what you signed up for. If it concerns a paid webinar or training, I will also process your invoice details. These records are retained for 7 years in accordance with the rules of the Dutch Tax Authorities.

To enable your personal account in the academy, I process a password. I store this password in encrypted form, in combination with your email address and/or username. I do this to prevent security fraud. I retain these account details, as well as any posts you make in the community, until you delete your account or no longer have access to the content.

Finally, for security purposes, I use camera surveillance at the entrance of the salon. I do this in the interest of public safety. I will retain these camera recordings for a maximum of 4 weeks.

### **Article 3: How do I obtain this data?**

The above data has been obtained from you as a customer or website visitor because you have provided this information to me.

### **Article 4: What rights do you have regarding this data?**

The General Data Protection Regulation grants you several rights concerning the personal data you have allowed me to process:

1. Access – You may request access to your data at any time.
2. Modification – If, based on your access, you wish to have your data adjusted, corrected, supplemented, restricted, or deleted, you can submit a request. You can also adjust certain data yourself within your personal account.
3. Objection – You may object to the processing of your data if it is based on a legitimate interest.
4. Data portability – If you want to transfer your data to another provider, I will provide your data in a structured and commonly used format that can be opened by standard digital systems.
5. Withdrawal of consent – If I process data based on your explicit consent, you have the right to withdraw this consent at any time. This may affect the services I can provide to you.

To exercise your rights, you can send a request, including a copy of your identification document (with your BSN/SSN and photo masked), to [info@asmrheadspa.nl](mailto:info@asmrheadspa.nl). I will process your request as soon as possible, but no later than 30 calendar days. If I cannot comply with your request, I will inform you of the

reason for denial.

#### **Article 5: Who receives your data?**

I will not share your data with third parties unless it is necessary for business operations or required by legal obligations. Your data may be shared with processors and parties involved in fulfilling the agreement. I enter into data processing agreements with these third parties to ensure your privacy is optimally protected. I will not sell your data to third parties.

#### **Article 6: Final provisions**

I recommend that you consult this privacy statement regularly, as I may make changes to my policies. If you have any questions about this statement or how I use your data, you can send an email to [info@asmrheadspa.nl](mailto:info@asmrheadspa.nl). If you have a complaint about how I handle your data, please let me know. You can also contact the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).