

Name of business: GCS Consulting t/a Garrs Cosmetic Safety

PRIVACY NOTICE

Data Controller for GCS Consulting:

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What this Notice is about

This Privacy Notice tells you what information we obtain and hold about you. It explains what information we collect, why we collect it, and what we do with it, as well as who we share it with. We collect and handle personal information to enable us to provide Cosmetic Product Safety Reports (CPSRs).

We call this information "your information". It is also referred to as "data".

You should read this notice when you give us information so you are aware of how and why we are using this. Please update us if any information supplied by you changes.

Why we are giving you this notice

We are required by data protection law to provide this notice. We must be open with you about why information is collected about you and then what is done with it. We must act fairly in relation to this information. You have various legal rights relating to this information which are spelt out in more detail in this notice.

In order that we can collect or use information about you there must be a legal basis or gateway for doing so. This notice identifies the relevant gateway for the various types of information we collect and hold about you. A detailed explanation of these gateways is given in this notice.

Under data protection legislation we can only process data "as necessary" and only to the extent that it is needed. For example, we can use your bank details regarding payments and other limited purposes only. We do not share your data with any third party controllers / processors.

The data we collect/hold about you

We use a submission form to collect data about you including the information you supply to us when applying for a CPSR. If you fail to provide this information we may not be able to proceed.

As necessary personal data is processed by us consisting of the following as applicable: -

- Identity and contact details
- Bank details (occasionally, if refund is required)
- Emails and other communications.

We also generate and use data internally, e.g. enquiry logs.

Sharing data with others

We do not share information we hold with others. In the unlikely event that we have to share, we must comply with data protection legislation.

Why we collect data and the legal basis for processing your personal data

We must tell you why we collect and hold information about you.

We must also have a legal basis before we are allowed to collect or process your personal data. Processing personal data includes recording, storing, altering, using, sharing or deleting data. We only need one of these "gateways".

This notice identifies the relevant gateway applicable in each case. In some cases, we will rely on more than one gateway depending on the particular purpose for which we are using your data.

Additionally, any data must be processed by us fairly and openly.

Why we process your data

The various purposes for which it may be necessary for us to process various categories of your information include: -

- For contractual performance for preparing CPSRs in accordance with EU 1223/2009 Cosmetic Regulation.

We may change the purposes where this is compatible for the purpose for which we obtained the data originally. If we need to use your data for a non-compatible purpose we will notify you and explain the legal gateway that allows us to do so. We may process your information without your knowledge where this is required or permitted by law.

More information about what we do with data and why, along with the relevant legal gateway is given in the Summary. This also tells you who we share data with and receive it from.

Retaining Communications

We will retain your emails. This is in our legitimate interests to maintain an accurate record of these. We need these records for our ongoing dealings with you, including our data protection obligations.

Length of storage of data

Data can only be stored on a time limited basis and not indefinitely. However, there is a legal obligation for Responsible Persons to hold the PIF file for 10 years after the final placing on the market of the cosmetic product; therefore it is reasonable to retain the CPSR report in our systems for that period.

Where submission form is provided, but work is not contracted to be performed, the form will be retained for 1 year.

Storage and security of data

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. All our information is stored securely electronically on servers or devices.

Holding data outside the European Union

Our email account is web based. Providers store related data internationally and not necessarily within the European Union. The provider has confirmed they comply with GDPR requirements.

Your rights

Where we hold personal data about you, you are the data subject. Data protection legislation gives you a number of rights. To exercise any of these rights you should contact us. You can do so by email at the address given above or you can telephone us on the number given above. You can also write to us at our address given at the top of this notice. Normally no fee is payable.

In particular you have a right to object to the processing of your information where we are processing this in our own legitimate interests or those of someone else. This applies if you feel that this impacts on your own interests or your fundamental rights or freedoms.

These rights are as follows –

- Access – you have the right to make a request to be told what personal data we hold about you.
- Correction/Rectification – if you consider any data we hold about you is inaccurate you can tell us so that where appropriate this can be corrected. Where a mistake is made in data processing then you can ask to have it rectified. Any third parties who have received the data from us should then be told of the rectification and you should be informed by us of any such third parties.
- Erasure – you have a right to ask us in certain circumstances to erase any data we hold about you (the so called right to be forgotten).
- You can object to our processing of data – this allows you to object to our processing of data about you.
- Restricting processing – you can ask us to suspend processing of your personal data and we must then restrict processing of data.
- Data portability – this allows individuals to reuse their personal data for their own purposes across different services allowing them to move, copy or transfer personal data more easily.

Complaints

We operate our own internal complaints policy and if you have any concerns about the way in which we collect or handle data please contact us.

Additionally, you have the right to lodge a complaint with the Supervisory Authority who is –

Information Commissioner
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
www.ico.org.uk

Summary

About this Summary

As necessary, we collect, use and otherwise process different categories of information (data) about you relying on the various legal gateways available to us. This relates to your application for a CPSR and, if this goes ahead, so that we can manage the tenancy and the property along with associated matters. This part of this notice gives you a general description of these processing activities for the different categories of information and the purposes for which we process your information. If you consider that we have not given sufficient details of what we do then you can make an access request for more information.

Altering Data

We are required by data protection legislation to keep your information up to date and it is of course in our own legitimate interests to do so for us to ensure that we have accurate records.

Storing Data

We keep information electronically. We do this because we need to use it from time to time. Additionally, however, there are legal obligations to retain data under data protection law, taxation legislation and Cosmetic Regulation. We also need to do so to fulfil our contract with you. In our own legitimate interests, we also need to retain information to deal with enquiries or disputes and for audit purposes.

Destruction of Data

We delete/destroy data once it is no longer needed. This is a requirement of data protection law. This notice tells you the period for which we normally store data.

What this Summary tells you

Information is handled as necessary from time to time. As already stated, information falling under one category can be amalgamated with or added to information in another category in order to carry out the stated purposes.

Part 1 of this Summary tells you, depending on the relevant category of your information, what our processing activities are and what is the legal gateway permitting processing as well as the purpose for which we carry out these processing activities.

Where the legal gateway in question is our own legitimate interests (or those of a third party) we identify the relevant legitimate interests.

Details about sharing data are set out in Part 2, whether we transfer it to someone else or receive from a third party.

Part 1 – Collecting, compiling, using and storing your information

In this Part we list out the different categories of your information, briefly explain them where needed, explain what we do with the information and why, as well as specifying the relevant legal gateway we rely on to do so.

We use the word “handle” to cover collecting, compiling, using or storing this information.

Identity and contact details

1. This includes name, address, phone number and email address. This is collected to perform our contract and maintain contact with you.

Bank details

1. This includes details of your bank, building society or other paying organisation, including those operating digitally/online.
2. We handle this information in order to receive payments from you or on occasion to make payments to you. This is done to perform our contract.

Complaints

1. We operate a complaints procedure which is informal. Although we will do all we can unfortunately sometimes things go wrong so complaints may arise.
2. Information handled concerns complaints which you may make or which may be made on your behalf. These will give rise to communications and records being compiled by us.
3. We handle complaints with a view to resolving these, although this might involve external intervention, e.g. by the courts.
4. We handle complaints for contract performance. This is also done in our own legitimate interests. These are to protect ourselves against claims and to ensure that the complaints are properly resolved.

Correspondence etc

1. Correspondence includes all ways in which we receive communications from whatever source. This includes emails, social messaging, letters and documentation.
2. This is done for contractual performance where applicable, to carry out any applicable legal obligations imposed on us, to protect your vital interests, or in our legitimate interests. These legitimate interests are to ensure that we have the necessary information relating to these matters and for accurate record keeping.

Part 2 – Sharing Information

We do not share your information.