

Locks by Rose (Rosaria Yasar-Hous) attaches great importance to the protection of your personal data. In this privacy statement, we explain which personal data we collect, why, how long we retain it, and what your rights are. We process your data in accordance with the General Data Protection Regulation (GDPR).

1. Who is responsible?

Locks by Rose Rosaria Yasar-Hous Oosterhout, Netherlands

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We are the data controller. No Data Protection Officer has been appointed, as this is not mandatory for a small sole proprietorship.

2. Which personal data do we process?

We only process personal data necessary for our services:

- **Name and contact details** (email, phone number) – via WhatsApp bookings, intake, or appointments.
- **Data about your hair/locks** (length, condition, type of locks, care routine, any allergies or health information relevant to the treatment) – for safe and customized services.
- **Photos of your hair** (before/after, during consultation or treatment) – only with your explicit consent, for your file and possibly testimonials/promotion.
- **Appointment and payment details** (date/time of appointment, payment method, invoice info).
- **Technical website data** (IP address, browser type, visited pages) – automatically collected when visiting the site (for basic statistics and security).

We do not collect special categories of personal data (such as race/ethnicity) unless relevant to the treatment (e.g., hair type), and only with your consent or necessity.

3. Why do we process your data? (legal bases)

We process your personal data based on:

- **Performance of the contract** (Art. 6.1(b) GDPR) – for making appointments, consultations, treatments, payments, and aftercare.
- **Consent** (Art. 6.1(a) GDPR) – for photos in testimonials, use on website/social media, or newsletters (if any).
- **Legitimate interests** (Art. 6.1(f) GDPR) – for website security, basic statistics (e.g., via hosting provider), and service improvement.
- **Legal obligation** (Art. 6.1(c) GDPR) – for invoicing and accounting (7-year retention required).

4. How long do we retain your data?

We do not retain data longer than necessary:

- Appointment/contact details: maximum 2 years after the last treatment (or longer if legally

required, e.g., invoices for 7 years).

- Hair and treatment data: maximum 5 years after the last appointment (for possible aftercare or complaints).
- Photos: as long as you give consent, or until you withdraw it (you can always request removal).
- Website log data (IP etc.): maximum 14 months (anonymized where possible).

After this period, we delete or anonymize the data.

5. With whom do we share your data?

We only share your data when necessary and with safeguards:

- **No sale** to third parties.
- **WhatsApp** (Meta) – for bookings (WhatsApp falls under Meta's privacy policy; we share only name/phone for contact).
- **Payment providers/bank** – only for payments (no online payments currently).
- **Hosting (Hostinger)** – for website functionality (data processing agreement).
- **Possible accountant** – for administration (with data processing agreement).

We do not share data outside the EU (all tools are EU-compliant or use standard contractual clauses).

6. Your rights

You always have the right to:

- Access your data.
- Correction or supplementation.
- Erasure ("right to be forgotten").
- Restriction of processing.
- Objection to processing.
- Data portability.
- Withdraw consent (where consent is the basis, e.g., photos).

Send an email to locksbyrose@gmail.com with your request. We will respond within 1 month. If in doubt, we may request identification. Complaints? Contact us, or file with the Dutch Data Protection Authority (www.autoriteitpersoonsgegevens.nl).

7. Cookies and website

Our website uses only necessary cookies (for functionality). We have no tracking cookies (no Google Analytics etc.). See our cookie notice if applicable. You can manage cookies via your browser.

8. Security

We take appropriate measures to prevent misuse, loss, or unauthorized access (e.g., secure WhatsApp communication, secure hosting). In case of a data breach, we report it to the Dutch Data Protection Authority and to you if required.

9. Changes

This statement may be updated. Check the website or PDF regularly for the latest version.

Questions? Feel free to contact us at locksbyrose@gmail.com or +31 6 3026 4330.

Kind regards, Rosaria Yasar-Hous Locks by Rose