

Data protection considerations for hairdressers and lifestyle businesses

With the obligation to collect information about your clients for contact tracing purposes, you may be collecting personal data from your clients that you may not have asked for before. With new ways of working, you may be using personal information in different ways or storing it in different forms. It is important that you stay on the right side of the Island's data protection laws and this prompt sheet should help you to think about some of the key things that you might need to do.

Do I need to register as a data controller?

If you are using personal data for certain purposes, you may need to register with the Island's Information Commissioner (the ICO) as a data controller. If you're not already registered, there is a useful tool on the ICO's web site which can help you decide - <https://www.inforights.im/registration/need-to-register/>

Even if you do not need to register, you need to comply with the principles of the data protection legislation and so the following are good questions to consider:

- **Do my clients know why I am collecting this information, what I intend to do with it, how I am going to store it and what I'm going to do with it when I don't have to keep it anymore?** The best way to ensure that a client can clearly understand this is to include it in a Privacy Notice which you can display in your salon or place of work.
- **How will I make sure that the information I collect isn't going to be used for any other purpose?** For example, if you're collecting contact information for the purposes of contact tracing and you decide to use it for marketing purposes, this might require further consideration from a data protection perspective.
- **Am I comfortable that I am not collecting more information than I actually need?** Collecting additional information 'just in case' can feel like a good thing to do but it can lead to issues for compliance with the data protection requirements.
- **How I will ensure that the information that I need is stored securely, kept confidential and destroyed securely when I don't need it anymore?**
- **Do I know what to do if a client says that they don't want to provide the information or they ask to see the information I hold about them or about someone else?** People have rights under the data protection legislation and it is important that you know what to do if they want to exercise those rights.
- **Do I know what I will do if I am required to provide information for contact tracing?** If you are required to share the information you have collected for contact tracing purposes, it is important that you check that the person asking for



the information has the authority to ask for it and that you are comfortable that it will be transferred to them securely.

We hope that the above is useful as you return to work – if you have any questions on it, please feel free to contact our Head of Regulatory & Compliance Services, Sinead O'Connor on sinead@dq.im

