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## PRIVACY POLICY

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### **BACKGROUND:**

Shaneel Enterprises Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, <http://shaneel.com/> (“Our Site”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

#### **1. Information About [Us] OR [Me]**

Our Site is owned and operated by Shaneel Enterprises Limited, a limited company registered in England under company number 02171783.

Registered address: 78 Wembley Park Drive, Wembley, Middx, HA9 8HE.

Address: Amertrans Park, Bushey Mill Ln, Watford WD24 7JG.

VAT number: 504973048GB.

Data Protection Officer: Mr Hetal Shah.

Email address: [dpo@shaneel.com](mailto:dpo@shaneel.com).

Telephone number: 01923204450.

We are regulated by EU Cosmetic Regulations | Directive 76/768/EEC.

#### **2. What Does This Policy Cover?**

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

#### **3. What is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

#### **4. What Are My Rights?**

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.
- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

## 5. **What Data Do You Collect?**

Depending upon your use of Our Site, we may collect some or all of the following personal data:

- Name;
- Address;
- Email address;
- Telephone number;
- Business name;
- IP address;
- Web browser type and version;
- Operating system;
- A list of URLs starting with a referring site, your activity on Our Site, and the site you exit to.

## 6. **How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Supplying our products and/or services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and/or services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email that you have opted-in to (you may unsubscribe or opt-out at any time by following our unsubscribe link).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email with information, news, and offers on our products and/or services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.]]

We do not use automated systems for carrying out certain kinds of decision-making.

## 7. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- (a) The objectives and requirements of the Company;
- (b) The type of personal data in question;
- (c) The purpose(s) for which the data in question is collected, held, and processed;
- (d) The Company's legal basis for collecting, holding, and processing that data; and
- (e) The category or categories of data subject to whom the data relates.

## 8. **How and Where Do You Store or Transfer My Personal Data?**

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR as follows.

We share your data within the group of companies of which we are a part. Where this

involves the transfer of personal data outside the EEA, our group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage. These are known as “binding corporate rules”. More information on binding corporate rules is available from the [European Commission](#).

We use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These contracts ensure the same levels of personal data protection that would apply under the GDPR. More information is available from the [European Commission](#).

Where we transfer your data to a third party based in the US, this may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar to those in Europe. More information is available from the [European Commission](#).

Please contact us using the details below in Part 12 for further information about the particular data protection mechanism used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

#### **Technical Data Security Measures**

- All emails containing Personal Data must be encrypted;
- All emails containing Personal Data must be marked ‘confidential’;
- Personal Data may only be transmitted over secure networks;
- Personal data may not be transmitted over a wireless network if there is a reasonable wired alternative;
- Personal Data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself and associated temporary files should be deleted;
- Where personal data is to be sent by facsimile transmission the recipient should be informed in advance and should be waiting to receive it;
- Where Personal Data is to be transferred in hardcopy form, it should be passed directly to the recipient in accordance with this Policy;
- All Personal Data transferred physically should be transferred in a suitable container marked “confidential”;
- No Personal Data may be shared informally and if access is required to any Personal Data, such access should be formally requested from the DPO;
- All hardcopies of Personal Data, along with any electronic copies stored on physical media should be stored securely;
- No Personal Data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Company or not, without authorisation;
- Personal Data must be handled with care at all times and should not be left unattended or on view;
- Computers used to view Personal Data must always be locked before being left

unattended;

- No Personal Data should be stored on any mobile device, whether such device belongs to the Company or otherwise without the formal written approval of the DPO and then strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary;
- No Personal Data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Company where the party in question has agreed to comply fully with the Company's Data Protection Policy and the GDPR;
- All Personal Data stored electronically should be backed up regularly with backups stored onsite. All backups should be encrypted;
- All electronic copies of Personal Data should be stored securely using passwords and encryption;
- All passwords used to protect Personal Data should be changed regularly and should must be secure;
- Under no circumstances should any passwords be written down or shared. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords;
- All software should be kept up-to-date. Security-related updates should be installed as soon as reasonably possible after becoming available;
- No software may be installed on any Company-owned computer or device without approval; and
- Where personal data held by the Company is used for marketing purposes, it shall be the responsibility of the DPO to ensure that the appropriate consent is obtained and that no data subjects have opted out, whether directly or via a third-party service such as the TPS.

### **Organisational Data Security Measures**

- The following organisational measures are in place within the Company to protect the security of personal data:
- All employees and other parties working on behalf of the Company shall be made fully aware of both their individual responsibilities and the Company's responsibilities under the GDPR and under the Company's GDPR Policy;
- Only employees and other parties working on behalf of the Company that need access to, and use of, personal data in order to perform their work shall have access to personal data held by the Company;
- All employees and other parties working on behalf of the Company handling Personal Data will be appropriately trained to do so;
- All employees and other parties working on behalf of the Company handling Personal Data will be appropriately supervised;
- All employees and other parties working on behalf of the Company handling

Personal Data should exercise care and caution when discussing any work relating to Personal Data at all times;

- Methods of collecting, holding, and processing Personal Data shall be regularly evaluated and reviewed;
- The performance of those employees and other parties working on behalf of the Company handling Personal Data shall be regularly evaluated and reviewed;
- All employees and other parties working on behalf of the Company handling Personal Data will be bound by contract to comply with the GDPR and the Company's GDPR Policy;
- All agents, contractors, or other parties working on behalf of the Company handling personal data must ensure that any and all relevant employees are held to the same conditions as those relevant employees of the Company arising out of the GDPR and the Company's GDPR Policy; and
- Where any agent, contractor or other party working on behalf of the Company handling Personal Data fails in their obligations under the GDPR and/ or the Company GDPR Policy, that party shall indemnify and hold harmless the Company against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

#### 9. **Do You Share My Personal Data?**

We may share your personal data with other companies in our group. This includes our holding company and its subsidiaries.

We may sometimes contract with the following third parties to supply certain products and/or services. These may include payment processing, delivery, and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold. The list of third parties we may send your personal data to is contained in our Privacy Notice which may be accessed at <http://shaneel.com/PrivacyNotice.pdf>.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

#### 10. **Can I Withhold Information?**

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

#### 11. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request without undue delay and within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our] progress.

#### 12. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Mr Hetal Shah):

Email address: [dpo@shaneel.com](mailto:dpo@shaneel.com)

Telephone number: 01923204450

Postal Address: Amertrans Park, Bushey Mill Ln, Watford WD24 7JG

#### 13. **Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.