

## Privacy Policy

Last updated: 13 August 2025

### 1. Introduction

Icon Hair Systems Ltd (“we”, “our”, “us”) respects your privacy and is committed to protecting your personal data. This Privacy Policy explains how we collect, use, and safeguard your information when you interact with us, whether through our website, by email, over the phone, in person, or by other means.

We process your personal data in accordance with the EU General Data Protection Regulation (GDPR), the Irish Data Protection Act 2018, and any other applicable data protection laws.

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### 2. Who We Are

Company name: Icon Hair Systems Ltd

Registered address: 26A James Fintan Lawlor Ave, Portlaoise, Co Laois, R32 A381

Company number: 756466

Data Controller contact: iconhairsystems@gmail.com

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### 3. What Information We Collect

We may collect the following types of information:

Identity Data: Full name, date of birth, and similar identifiers.

Contact Data: Address, email address, phone number.

Order & Service Data: Details relating to products or services purchased.

Financial Data: Payment details (processed via secure payment providers – we do not store full card details).

Technical Data: IP address, browser type, device identifiers, and browsing behaviour on our website.

Health Data: Where relevant to the service provided (e.g., hair/scalp conditions, allergies, or medical history relating to hair loss). This is considered “special category” data under GDPR and is processed only with your explicit consent.

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#### 4. How We Collect Your Information

We collect data in several ways, including:

Directly from you (e.g., when you contact us, place an order, or complete a consultation form)

Through our website (cookies, analytics tools)

From payment processors when you make a purchase

From delivery or courier services for product dispatch

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## 5. How We Use Your Information

We use your personal data for:

Responding to your enquiries

Processing and delivering product orders

Providing and customising our hair systems and related services

Processing payments and issuing receipts/invoices

Sending product or service updates (only with your consent)

Complying with legal obligations (tax, accounting, product safety)

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## 6. Legal Basis for Processing

We process personal data under the following lawful bases:

Contract: To fulfil our obligations when you purchase products or services.

Consent: For sending marketing communications or processing health data.

Legal obligation: For record-keeping and compliance purposes.

Legitimate interests: For improving services, ensuring security, and business administration.

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## 7. Sharing Your Data

We only share your personal information when necessary, and only with:

Service providers (e.g., IT systems, payment processors, delivery companies)

Professional advisers (e.g., accountants, legal advisers)

Government bodies or law enforcement (where legally required)

We do not sell or rent your data to third parties.

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## 8. International Data Transfers

If we transfer your data outside the European Economic Area (EEA), we ensure appropriate safeguards are in place, such as EU-approved Standard Contractual Clauses or adequacy decisions by the European Commission.

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## 9. Data Retention

We keep your personal data only as long as necessary for the purposes collected, or as required by law. Special category health data will be deleted as soon as it is no longer required for service provision.

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## 10. Your Rights

Under the EU GDPR, you have the right to:

Access your data (make a Subject Access Request)

Rectify inaccuracies in your data

Erase your data (“right to be forgotten”)

Restrict or object to processing

Withdraw consent (where processing is based on consent)

Data portability

You can exercise these rights by contacting us at [iconhairsystems@gmail.com](mailto:iconhairsystems@gmail.com)

You also have the right to lodge a complaint with the Data Protection Commission (DPC) at [www.dataprotection.ie](http://www.dataprotection.ie).