

# Gillian's Skin Clinic Privacy Notice

## 1. Introduction

This privacy notice describes how Gillian's Skin Clinic ("Gillian's", "we", "our" or "us") may collect, hold, use and disclose personal information in connection with the services that we provide (the "Services"). This privacy notice applies to all of the Services offered by Gillian's.

Gillian's is responsible for any personal information that is collected, held, used or disclosed in relation to the Services.

This privacy notice provides individuals with clear and easily accessible information about our practices and policies regarding personal information and is intended to comply with the requirements of the Personal Information Protection Act 2016 ("PIPA").

## 2. Personal Information We Collect

"Personal Information" means any information about an identified or identifiable individual. We may collect Personal Information through the following list of sources:

- provided by you (which may include your name, address, email, passport, social insurance number, age, gender, marital status, number of dependents, health history and employment history);
- third parties, including criminal background checks; and
- our security cameras.

To keep your Personal Information safe and secure, we have implemented appropriate physical and electronic measures. In the event of a security breach, any affected person will be notified.

## 3. Security Cameras

We utilize security cameras for several reasons:

- to ensure the safety and security of those at Gillian's;
- to protect our assets and property; and
- to deter and detect theft, vandalism and other unlawful activities.

Our security cameras capture visual images and video footage of individuals within or near our premises. Cameras are strategically placed in areas such as the reception area and outside the entrance to our business, ensuring coverage of critical points. We do not install cameras in areas where individuals have a reasonable expectation of privacy, such as the restroom and the treatment rooms. Access to footage is restricted to authorized personnel who require it for legitimate purposes.

## 4. How We Use Your Personal Information

We may use your Personal Information for the following purposes or as otherwise described at the time of collection:

- to administer our Services;
- to process, assess and determine any requests or questions made by you in connection with our Services;
- to communicate with you about our Services;
- as stated in section 3 above;
- to process employment applications;
- to comply with applicable laws and regulations, lawful requests, court orders and legal process;
- to protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- to prevent, identify, monitor, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity;
- to send marketing communications related to our Services (you may opt-out of our marketing communications by contacting us).

## 5. How We Share Your Personal Information

We may share your Personal Information with service providers and other third parties we use to support our business. We may also disclose Personal Information about you to third parties where we have a legitimate purpose for doing so, including:

- if we are required to do so by any rule or law or by the order of any court;
- in response to a request from law enforcement authorities or other government officials; or
- when we believe disclosure is necessary or appropriate to enforce our rights or agreements, prevent physical harm or financial loss, or in connection with an investigation of suspected or actual illegal activity.

## 6. Your Rights in Relation to Your Personal Information

You have certain rights with respect to your Personal Information, and you may submit to us reasonable written requests to:

- Access, examine or receive a copy of your Personal Information that is in our custody or control
- Correct an error or omission in any of your Personal Information which is under our control
- Cease, or not to begin, using your Personal Information (i) for the purposes of advertising, marketing or public relations or (ii) where the use is causing or likely to cause substantial damage or substantial distress to yourself or another
- Erase or destroy your Personal Information where it is no longer relevant for the purposes of its use

In certain circumstances, we may not be obligated to comply with your request and you can request a review by the Bermuda Privacy Commissioner of our decision, action or failure to act, and you may initiate a complaint against us with the Bermuda Privacy Commissioner.

## 7. How to Contact Us

For general inquiries about Gillian's or any of our Services, more information can be found at our website, [www.gilliansbermuda.com](http://www.gilliansbermuda.com). Our place of business is located at 14 South Road, Devonshire, Bermuda and we can also be reached at 441 232 0496.

If you have any questions about this privacy notice or to request more details about your rights and how we collect, use and disclose your Personal Information, please contact our Privacy Officer, John Edwards, at [gilliansskinclinic@northrock.bm](mailto:gilliansskinclinic@northrock.bm). Any request must be in writing with sufficient detail to allow us to identify the Personal Information to which the request relates.

## 8. Privacy Notice Updates

This privacy notice is subject to change in accordance with changes to applicable laws or our internal policies and procedures. The date below indicates when this privacy notice was last revised.

Any changes to this privacy notice will be effective upon publication of the revised privacy notice, and continued use of our Services following such changes indicates your acceptance of the revised privacy notice.

*Last Revised: 1 January 2025*