

# HENRIETTA

B E A U T Y A C A D E M Y

## Privacy Policy & GDPR Compliance

Last updated: April 2026

### 1. Introduction

Welcome to henrietta.pro, operated by Henrietta Orosz (trading as Henrietta Orosz Beauty Academy and Belair Beauty). We are committed to protecting your personal data and respecting your privacy in accordance with the General Data Protection Regulation (GDPR) (EU) 2016/679 and all applicable data protection laws.

This Privacy Policy explains how we collect, use, store and protect your personal data when you visit our website, book our services, enrol in our courses, purchase products or contact us through any channel.

By using this website, you agree to the collection and use of your information as described in this policy.

### 2. Who We Are (Data Controller)

The data controller responsible for your personal data is:

#### **Henrietta Orosz Beauty Academy**

Trading as: Belair Beauty / Henrietta Orosz Beauty Academy

Website: henrietta.pro

Email: belair.beauty.lux@gmail.com

Instagram: @henrietta\_o

Headquarters: Luxembourg, 16 rue des Franciscaines, L1539

### 3. What Personal Data We Collect

#### 3.1 Data you provide directly:

- Name and contact details (email address, phone number)
- Booking information (appointment date, service requested)
- Course enrolment details (name, experience level, payment details)
- Messages and enquiries submitted via contact forms or email
- Waitlist and notification sign-ups (email address)
- Purchase information for products (CURLx book, LashMetric app)

#### 3.2 Data collected automatically:

- IP address and browser type

# HENRIETTA

## BEAUTY ACADEMY

- Pages visited and time spent on the website
- Device information and operating system
- Cookies and similar tracking technologies (see Section 8)

#### 4. Why We Collect Your Data (Legal Basis)

We collect and process your personal data on the following legal bases under GDPR:

- **Contract performance** — to process bookings, course enrolments and product purchases
- **Legitimate interests** — to respond to enquiries, improve our services and manage our business
- **Consent** — to send you marketing communications, newsletters or event notifications (you may withdraw consent at any time)
- **Legal obligation** — to comply with applicable laws, tax regulations and legal requirements in Luxembourg and the EU

#### 5. How We Use Your Personal Data

We use your personal data to:

- Process and confirm bookings for lash extension appointments at Belair Beauty
- Manage course and training programme enrolments
- Process payments and issue receipts
- Respond to your enquiries and provide customer support
- Send booking confirmations, reminders and aftercare information
- Notify you of upcoming events, masterclasses and new courses (with your consent)
- Manage waitlists for courses, events and the brand collaboration launch
- Improve our website and services based on how visitors use them
- Comply with our legal and tax obligations

#### 6. Who We Share Your Data With

We do not sell, rent or trade your personal data to third parties. We may share your data only with:

- **Payment processors** — to handle secure transactions (e.g. Stripe, PayPal or Wix Payments)
- **Booking platform providers** — to manage appointment scheduling
- **Email service providers** — to send confirmations and communications
- **Analytics providers** — to understand website usage (data is anonymised where possible)

# HENRIETTA

## BEAUTY ACADEMY

- **Legal and regulatory authorities** — where required by law

All third-party providers are required to handle your data securely and in compliance with GDPR.

### 7. International Data Transfers

henrietta.pro is operated from Luxembourg and serves clients worldwide. If you are located outside the European Economic Area (EEA), please be aware that your data may be processed in countries with different data protection standards. Where this occurs, we ensure appropriate safeguards are in place, including Standard Contractual Clauses approved by the European Commission.

### 8. Cookies

Our website uses cookies to improve your experience and analyse website traffic. Cookies are small text files stored on your device.

#### We use the following types of cookies:

- **Essential cookies** — necessary for the website to function correctly
- **Analytics cookies** — to understand how visitors use our site (e.g. Google Analytics)
- **Preference cookies** — to remember your settings and preferences
- **Marketing cookies** — only with your explicit consent

You can control and manage cookies through your browser settings at any time. Disabling certain cookies may affect your experience on the website. By continuing to use our site, you consent to our use of cookies as described above.

### 9. How Long We Keep Your Data

- **Booking and appointment records** — 3 years from the date of service
- **Course enrolment records** — 5 years for certificate and compliance purposes
- **Financial and payment records** — 7 years (as required by Luxembourg tax law)
- **Marketing consent records** — until you withdraw consent
- **General enquiry data** — 12 months from the date of last contact

After the applicable retention period, your data is securely deleted or anonymised.

### 10. Your Rights Under GDPR

As a data subject under GDPR, you have the following rights:

- **Right of access** — you can request a copy of the personal data we hold about you
- **Right to rectification** — you can ask us to correct inaccurate or incomplete data
- **Right to erasure** — you can request that we delete your personal data ('right to be forgotten'), subject to legal obligations

# HENRIETTA

## BEAUTY ACADEMY

- **Right to restrict processing** — you can ask us to limit how we use your data
- **Right to data portability** — you can request your data in a structured, machine-readable format
- **Right to object** — you can object to processing based on legitimate interests or for direct marketing
- **Right to withdraw consent** — where processing is based on consent, you can withdraw it at any time without affecting prior processing

To exercise any of these rights, please contact us at: [belair.beauty.lux@gmail.com](mailto:belair.beauty.lux@gmail.com)

We will respond to your request within 30 days. We may need to verify your identity before processing your request.

### 11. Data Security

We take the security of your personal data seriously. We implement appropriate technical and organisational measures to protect your data against unauthorised access, loss, destruction or alteration. These include:

- Secure HTTPS encryption on our website
- Password-protected systems and restricted access to personal data
- Regular review of our data handling practices

While we take every reasonable precaution, no method of transmission over the internet is 100% secure. If you have concerns about data security, please contact us directly.

### 12. Children's Privacy

Our website and services are not directed at children under the age of 16. We do not knowingly collect personal data from children. If you believe a child has provided us with personal data, please contact us immediately and we will delete it promptly.

### 13. Links to Third-Party Websites

Our website may contain links to third-party websites (including Instagram, TikTok and the LashMetric app). We are not responsible for the privacy practices of those sites and encourage you to read their privacy policies before providing any personal data.

### 14. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. The most current version will always be published on [henrietta.pro](https://henrietta.pro) with the date of the latest update. We encourage you to review this page periodically.

### 15. How to Complain

If you are unhappy with how we have handled your personal data, you have the right to lodge a complaint with the relevant supervisory authority:

# HENRIETTA

B E A U T Y A C A D E M Y

**Commission Nationale pour la Protection des Données (CNPD)**

Luxembourg's national data protection authority

Website: [cnpd.public.lu](https://cnpd.public.lu)

Address: 15, Boulevard du Jazz, L-4370 Belvaux, Luxembourg

We would, however, appreciate the opportunity to address your concerns directly before you contact the CNPD. Please reach out to us first at [belair.beauty.lux@gmail.com](mailto:belair.beauty.lux@gmail.com).

## **16. Contact Us**

For any questions, requests or concerns regarding this Privacy Policy or your personal data, please contact:

### **Henrietta Beauty Academy**

Email: [belair.beauty.lux@gmail.com](mailto:belair.beauty.lux@gmail.com)

Instagram: [@henrietta\\_o](https://www.instagram.com/henrietta_o)

Website: [henrietta.pro](https://henrietta.pro)

Headquarters: Luxembourg, 16 rue des Franciscaines, L1539