PRIVÈ

ADVANCED FACIAL AESTHETICS LIMITED

POLICY, CLINICAL & MEDIA SUITE

Clinical excellence. Considered aesthetics. Patient-first care.

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Privè Advanced Facial Aesthetics Limited

Contents

Privè Advanced Facial Aesthetics Limited

Clinical Standards & Patient Safety

At Privè Advanced Facial Aesthetics, patient safety, ethical practice and clinical excellence are at the heart of everything we do. As the first Toskani Med Centre of Excellence in the UK & Ireland, we are committed to maintaining exceptional standards of care throughout consultation, treatment planning, treatment and aftercare.

Qualified Medical Practitioners

Treatments are delivered by appropriately qualified medical practitioners, including doctors and nurse practitioners, with advanced aesthetic training and competence appropriate to the procedures they provide.

- Advanced clinical and anatomical knowledge
- Appropriate patient selection and treatment planning
- Recognition and management of potential complications
- Ethical, patient-first decision-making
- Ongoing professional development and clinical accountability

Consultation & Assessment

Every treatment journey begins with an appropriate consultation and clinical assessment. This may include a review of medical history, medication and allergies; discussion of concerns and goals; assessment of suitability; treatment options and alternatives; risks, benefits and expected recovery; and an opportunity to ask questions.

No treatment is undertaken without appropriate assessment and consent. Some treatments require a separate appointment, additional assessment or a test patch.

Informed Consent

Consent must be informed, considered and freely given. Before treatment, patients receive appropriate information about the proposed procedure, material risks and side effects, alternatives, aftercare and realistic expectations. Aesthetic outcomes cannot be guaranteed and individual responses vary. Consent is an ongoing process and may be withdrawn before treatment.

Product Quality, Sourcing & Transparency

We select professional and medical aesthetic products from reputable manufacturers and appropriate supply channels. Product choice is based on clinical judgement, individual suitability and the treatment indication. Relevant ingredients, sensitivities and contraindications can be discussed during consultation, and full ingredient information is available where applicable.

Treatment Environment & Aftercare

Treatments are undertaken in an appropriate clinical environment using infection-prevention measures, sterile or aseptic techniques where required, professional equipment and evidence-informed protocols. Patients receive treatment-specific aftercare and access to appropriate follow-up support.

The Privè Approach

- Patient safety over trends
- Natural, balanced outcomes
- Honest clinical advice
- Long-term skin health
- Individualised, proportionate care

Clinical Evidence & Treatment Science

Our approach to regenerative aesthetics is grounded in clinical understanding. We consider how ingredients, technologies and treatment modalities interact with the skin, the biological processes they are intended to support and the strength of available evidence. Recommendations are made following individual assessment rather than trend.

PDRN - Lumicen

Polydeoxyribonucleotide (PDRN) is used within regenerative aesthetic practice for its potential role in supporting tissue repair and skin recovery. Proposed actions include pathways associated with cellular repair, fibroblast activity, extracellular matrix function and tissue quality.

- Skin quality and resilience
- Hydration
- Elasticity
- Recovery and regeneration

Hyaluronic Acid - TKN HA 3

Hyaluronic acid is naturally present in human tissue and has a strong capacity to bind water. Pure, non-cross-linked HA protocols may be selected with a focus on hydration and skin quality rather than structural volumisation.

- Hydration
- Elasticity
- Texture and overall skin quality

Professional Chemical Resurfacing

Professional peels use carefully selected acids to create controlled exfoliation. Different formulations act differently, making assessment, concentration and protocol selection important.

- Uneven texture
- Congestion
- Appearance of pigmentation
- Dullness and photoageing

Targeted Mesotherapy

Mesotherapy can incorporate selected actives into a personalised professional protocol. Formulations may include peptides, hyaluronic acid, amino acids, vitamins and antioxidants according to treatment objectives.

- Hydration and skin quality
- Signs of ageing
- Uneven tone and vitality
- Selected scalp and hair concerns

Needle-Free Transdermal Delivery - TKN MesojectGun

Electroporation-based technology uses controlled electrical impulses intended to temporarily influence skin-barrier permeability and facilitate transdermal delivery of selected topical actives. Suitability and protocol are determined individually.

- Needle-free application
- Minimal skin disruption
- Professional delivery of selected topical actives

Medical Microneedling

Microneedling creates controlled microscopic channels, initiating physiological repair and remodelling processes involving fibroblasts, collagen and elastin. Depth and intensity are selected according to indication and skin.

- Uneven texture
- Certain types of scarring
- Fine lines
- Enlarged-looking pores and overall skin quality

Evidence Before Trend

Clinical evidence continues to evolve and its strength varies between ingredients, devices, indications and protocols. Privè therefore uses measured language, avoids guaranteed outcomes and discusses rationale, limitations, risks and alternatives during consultation. Individual results vary.

Aesthetic Regulation, Licensing & Patient Safety

At Privè Advanced Facial Aesthetics, we believe patients should be able to make informed decisions about who treats them, the products being used and the standards of care they can expect. Aesthetic medicine continues to evolve rapidly, and so does the regulatory framework intended to protect patients. For us, qualification, accountability, safe premises, appropriate product sourcing and effective clinical governance are fundamental to responsible aesthetic practice.

Understanding Aesthetic Regulation in England

Section 180 of the Health and Care Act 2022 gives the Secretary of State power to introduce a licensing scheme for specified non-surgical cosmetic procedures in England. The proposed framework is intended to include both practitioner and premises licensing, administered by local authorities. The Government published its consultation response in August 2025 and continues to develop the detailed regulatory framework.

The direction of travel is clear: patients should be able to expect appropriate competence, training, indemnity, hygiene, infection-control standards and suitable premises. Privè supports proportionate regulation that strengthens patient protection and professional accountability.

Why Practitioner Choice Matters

Advanced aesthetic procedures require more than technical ability. Appropriate care depends on clinical assessment, anatomical knowledge, understanding of contraindications, product selection, infection prevention, recognition of complications and knowing when treatment should not proceed.

Before choosing a practitioner, we encourage patients to consider the following:

- The identity of the practitioner and the professional qualifications they hold
- Training and competence for the specific procedure
- How medical history, contraindications and treatment suitability are assessed
- The product or device to be used and how it has been sourced
- Arrangements for complications, emergencies and aftercare
- Whether the treatment environment is appropriate for the procedure
- Whether the practitioner holds appropriate professional indemnity or insurance

Vet It Before You Get It

We support the principle behind the British College of Aesthetic Medicine campaign "Vet It Before You Get It": patients should feel confident checking practitioner credentials, insurance and emergency arrangements before undergoing aesthetic treatment. A reputable practitioner should welcome questions about qualifications, products, risks, alternatives and complication management.

Prescription Medicines & Injectable Treatments

Some products used in aesthetic medicine are prescription-only medicines and carry specific prescribing and professional responsibilities. Other injectable products may fall within different regulatory classifications. Whatever the classification, product provenance, practitioner competence, appropriate assessment and informed consent remain essential.

Product Provenance & Patient Protection

Patients should be able to understand what is being used in their treatment and why. Products should be obtained through appropriate professional supply channels, stored correctly and used in accordance with relevant professional and manufacturer requirements. Counterfeit, illegally supplied or unregulated products can expose patients to avoidable risk.

Complications & Clinical Preparedness

All aesthetic procedures carry potential risks, even when undertaken appropriately. Good clinical practice is therefore not about claiming that complications can never occur; it is about reducing avoidable risk, recognising problems promptly and having appropriate systems to respond. Patients should receive clear aftercare information and know how to obtain timely advice if they have concerns.

What Good Aesthetic Practice Should Look Like

- Appropriate consultation and individual clinical assessment
- Informed consent, including benefits, limitations, material risks and alternatives
- Practitioners with appropriate qualifications, training and competence
- Transparent product and device selection
- A treatment environment appropriate to the procedure
- Complication-management and emergency protocols
- Accessible aftercare and follow-up support
- Professional records, governance, indemnity and complaints procedures

The Privè Standard

Privè believes aesthetic medicine should be practised with clinical judgement, professional accountability and respect for the individual patient. Our approach prioritises patient safety over trends, proportionate intervention, natural outcomes, evidence-informed practice and transparency. Where treatment is not clinically appropriate or is not considered to be in a patient's best interests, we will advise against proceeding.

Further Reading & Patient Safety Resources

Our online patient-safety and licensing library brings together external material from organisations and publications including BCAM, UK Parliament, GOV.UK, Save Face, UCL, BBC, BMJ and JCCP. Resources are grouped under Choosing a Practitioner, Patient Safety, Licensing & Regulation, and Industry News. External articles are attributed to their original publishers and kept distinct from Privè's own clinical statements.

Current Regulatory Position

The Health and Care Act 2022 provides the legal power to create a licensing regime, but the detailed scheme depends on regulations made under that Act. Government proposals and implementation details may change as the framework develops. Patients and practitioners should therefore refer to current official guidance rather than relying on older news reports or proposed implementation dates.

Non-Surgical Treatments - Terms & Conditions

Your safety, comfort and experience are central to the care we provide. These terms are intended to ensure that every patient receives appropriate time and clinical attention while allowing the clinic to manage appointments fairly and efficiently.

Consultations

All consultations are subject to a £75 consultation fee, payable in advance at the time of booking. The fee may be redeemed against the cost of an aesthetic treatment where treatment is undertaken within 30 calendar days of the consultation and is clinically appropriate. If treatment is not undertaken within that period, the consultation fee is not carried forward or refunded.

New patients ordinarily attend consultation and assessment before treatment. Except where specifically agreed in advance, treatment will not usually be carried out at the first appointment. Certain treatments, including laser, IPL and hyaluronidase, require prior assessment and, where appropriate, a test patch.

Telephone Consultations

In-clinic consultation is recommended wherever possible. Telephone consultations may be offered in suitable circumstances, including for patients travelling a considerable distance. They are allocated up to 30 minutes, must be arranged in advance and are subject to the £75 consultation fee. A telephone consultation does not replace any face-to-face assessment, examination or test patch required before treatment.

Appointments, Cancellations & Rescheduling

We understand that plans can change. A minimum of 48 hours' notice is required to cancel or rearrange an appointment. Cancellations or requests to reschedule with less than 48 hours' notice, and missed appointments, will result in the £75 consultation fee or applicable booking deposit being forfeited. A new fee or deposit will be required to secure a further appointment.

Where at least 48 hours' notice is provided, we will be happy to transfer the booking to an alternative appointment, subject to availability. Appointment reminders are a courtesy; responsibility for attending or cancelling within the required notice period remains with the patient.

If You Are Unwell

Please do not attend for treatment if you are unwell. Treatment may need to be postponed if you have an illness, cold, active cold sore, local skin infection or another condition that could affect safety or outcome. Contact the clinic before travelling if you are unsure.

Reviews & Follow-Up

Routine Botulinum Toxin reviews are offered as a courtesy and should take place within the recommended review period of approximately 2-3 weeks. Any additional treatment is subject to clinical assessment. Complimentary additional treatment or a 'top-up' cannot be provided once the review period has passed.

Fees, Deposits & Payment

The full cost of a proposed treatment plan, including anticipated maintenance where applicable, will be explained before treatment. Payment is due in full at the time of treatment. Cash and major debit and credit cards are accepted.

Certain treatments may require a deposit or advance payment. For Sculptra® treatment, a non-refundable deposit is required at booking because product is prepared specifically for treatment, with a minimum of three days' notice. Other selected or longer appointments may also require a deposit; applicable terms will be explained before confirmation.

Results & Refunds

Aesthetic treatments are not an exact science and individual responses vary. No particular aesthetic outcome can be guaranteed. Treatment fees relate to the professional consultation, care, treatment and associated services provided rather

than a guaranteed result. Refunds cannot be offered solely because an outcome does not meet personal expectations. Nothing in these terms affects statutory rights.

Products, Age & Children

For hygiene and safety reasons, skincare products are non-returnable and non-refundable except where required by law, including where faulty or not as described. Aesthetic treatment is provided only to patients aged 21 and over. Please do not bring children to appointments; children are not permitted in consultation or treatment rooms.

Offers, Discounts & Vouchers

Promotional offers, discounts and vouchers are subject to their individual terms. Selected treatments or products may be excluded and, unless expressly stated otherwise, offers cannot be combined.

Clinical Privacy Notice

Patient confidentiality • clinical information governance • data protection

Privè Advanced Facial Aesthetics Limited | 6 Drake Circus, Plymouth, Devon PL4 8AQ | +44 7871 889000 | robertmunroe@priveadvancedfacialaesthetics.co.uk

Company No. 13850200 | ICO Registration No. ZC025587 | Version 3 | 4 September 2026

1. Our commitment to privacy and confidentiality

At Privè Advanced Facial Aesthetics Limited ("Privè", "we", "us" or "our"), privacy and confidentiality are integral to safe clinical care. Patients may entrust us with personal information of a sensitive and, in many cases, medical nature. We are committed to handling that information lawfully, fairly, transparently and securely, and only to the extent reasonably necessary to provide care, protect patient safety and operate our services responsibly.

This Clinical Privacy Notice explains how Privè collects and uses personal information, the circumstances in which information may be shared, how long it may be retained and the rights available to individuals. It applies to patients and prospective patients, website visitors and other individuals who communicate or interact with Privè.

This notice should be read alongside any treatment-specific consent information, cookie notice, terms and conditions, complaints policy and other privacy information supplied at the point at which particular information is collected.

2. Who is responsible for your information

Privè Advanced Facial Aesthetics Limited is the data controller for personal information where it determines the purposes and means of processing.

- Data controller: Privè Advanced Facial Aesthetics Limited
- Company number: 13850200
- ICO registration number: ZC025587
- Address: 6 Drake Circus, Plymouth, Devon PL4 8AQ
- Telephone: +44 7871 889000
- Email: robertmunroe@priveadvancedfacialaesthetics.co.uk

Privacy enquiries and requests to exercise information rights may be sent using the contact details above. Privè may nominate another appropriately authorised privacy contact from time to time without changing the identity of the data controller.

3. Information we may collect

The information we process depends on the services you enquire about or receive and the way in which you interact with Privè.

Identity, contact and administrative information

- name, date of birth and contact details;
- appointment, booking, cancellation and attendance information;
- correspondence, enquiries, feedback and complaint information;
- payment, invoice and transaction information (Privè does not need to retain full payment-card details where these are processed by a payment provider);
- communication preferences and marketing permissions; and
- identity or emergency-contact information where reasonably required.

Clinical and health information

Where you seek or receive clinical services, we may process information concerning your physical or mental health. Health information is special-category personal data and receives additional protection under data protection law.

- medical history, current or previous conditions and relevant symptoms;
- medication, allergies, sensitivities and contraindications;
- relevant pregnancy or breastfeeding information;
- previous procedures and treatments;
- consultation, assessment and treatment-suitability records;
- clinical opinions, treatment plans and consent records;
- prescribing and medicines information;
- products used and product/batch or lot traceability;
- clinical observations, treatment records and outcomes;
- aftercare, follow-up and unplanned review information;
- complications, adverse events, incidents and near misses;
- referrals and relevant correspondence with healthcare professionals; and
- other information reasonably necessary for safe clinical decision-making and continuity of care.

Clinical photographs and other imagery

Clinical photographs or other images may form part of the clinical record where reasonably necessary for assessment, treatment planning, baseline documentation, outcome monitoring, continuity of care or management of a complication. Their clinical use is distinct from use for marketing, publicity, education or publication.

Identifiable images will not be used for promotional or marketing purposes merely because they were taken for clinical care. Any proposed non-clinical use will be considered separately and an appropriate lawful basis obtained. Where consent is relied upon, refusal or later withdrawal will not adversely affect clinical care, although withdrawal cannot retrospectively make unlawful a use that was lawful before withdrawal.

Website and technical information

- IP address, browser, device and security information;
- cookie and similar-technology identifiers;
- website usage information; and
- information submitted through website forms or other digital communications.

A separate Cookie Notice and consent mechanism should describe the cookies and similar technologies actually deployed on the Privè website.

4. Where information comes from

Most personal information is obtained directly from you. Where appropriate and lawful, Privè may also receive information from a healthcare professional involved in your care, a person you have authorised, a pharmacy or prescribing service, a laboratory or diagnostic provider, an emergency or other healthcare service, an insurer or professional adviser, a professional or regulatory body, or another lawful source.

Where information is obtained indirectly, Privè will provide the privacy information required by law unless an applicable exemption applies.

5. Why we use personal information

Clinical care and patient safety

- assessing suitability for treatment and identifying contraindications or precautions;
- conducting consultations and making clinical decisions;
- prescribing, providing treatment and maintaining appropriate clinical records;
- providing aftercare and monitoring outcomes;
- responding to clinical concerns and managing complications;
- facilitating referrals or continuity of care; and
- protecting the vital interests of an individual in an appropriate emergency.

Patient administration

- responding to enquiries and arranging appointments;
- sending treatment, appointment and aftercare communications;
- managing payments, accounts and contractual arrangements; and
- administering the patient relationship.

Clinical governance, assurance and improvement

- investigating complaints, complications, incidents and near misses;
- undertaking clinical audit and outcome review;
- identifying trends and patient-safety signals;
- undertaking quality improvement and corrective or preventive action;
- reviewing clinical standards and practitioner performance where appropriate; and
- establishing, exercising or defending legal claims and obtaining professional or indemnity advice.

Legal, professional and regulatory purposes

Privè may process or disclose information where reasonably necessary to comply with applicable law, professional duties, medicines requirements, lawful requests, insurance or indemnity arrangements, safeguarding obligations, or appropriate reporting to a professional or other competent authority.

Marketing and service communications

Clinical, appointment and patient-safety communications are not treated as marketing merely because they are sent electronically. Direct marketing will be undertaken only where permitted by applicable data protection and electronic-communications law. You may opt out of direct marketing at any time.

6. Our lawful bases

Privè identifies an appropriate lawful basis under Article 6 UK GDPR for each material processing activity. Depending on the circumstances, this may include:

- Article 6(1)(b) - processing necessary to take steps at your request before entering into, or to perform, a contract;

- Article 6(1)(c) - processing necessary to comply with a legal obligation;
- Article 6(1)(f) - processing necessary for legitimate interests pursued by Privè or another person, where those interests are not overridden by your rights and interests;
- Article 6(1)(d) - processing necessary to protect vital interests in limited circumstances; and
- Article 6(1)(a) - consent, where consent is the appropriate lawful basis for the particular processing.

The consent you give to a clinical procedure is not automatically the same thing as consent to process personal information under data-protection law. Privè will not use consent as a default data-protection basis where another basis more accurately reflects the processing.

7. Special-category health information

Information concerning health is special-category personal data. Where Privè processes health information it must identify both an Article 6 lawful basis and an applicable Article 9 condition.

For processing genuinely necessary for the provision or management of healthcare or treatment, Privè may rely on Article 9(2)(h) UK GDPR together with the applicable provisions of the Data Protection Act 2018, where the statutory requirements are satisfied and the information is processed by, or under the responsibility of, a professional subject to an appropriate duty of secrecy.

Other Article 9 conditions may apply to particular activities - for example explicit consent for a distinct use, vital interests in an appropriate emergency, or legal claims where the statutory criteria are met. Privè will determine and document the applicable condition by reference to the actual purpose of processing rather than treating a single Article 9 condition as covering every use of health information.

8. Confidentiality and access

Patient confidentiality is a core clinical obligation. Access to personal and clinical information will be limited according to role, responsibility and legitimate need. Healthcare professionals remain subject to their applicable professional duties of confidentiality.

Clinical information will ordinarily be disclosed only for purposes connected with care; with appropriate authority; where necessary and lawful for governance or patient safety; where required or permitted by law; where justified by an overriding public-interest consideration; or where another lawful basis for disclosure applies.

9. Who information may be shared with

Depending on the circumstances, Privè may share relevant information with:

- Privè clinicians and appropriately authorised team members;
- prescribing clinicians, pharmacies, laboratories or other healthcare providers involved in care;
- providers of patient-record, appointment, communications, payment, hosting, storage, cybersecurity or other operational systems acting under appropriate arrangements;
- professional advisers, Privè General Counsel and professional indemnity insurers where appropriate;
- professional regulators or statutory authorities where disclosure is required or properly justified;
- the Joint Council for Cosmetic Practitioners (JCCP) where a matter properly falls within its remit and disclosure is lawful; and
- another person or organisation where you have authorised disclosure or another lawful basis applies.

Privè does not sell patient medical information. Where a supplier processes personal information on Privè's behalf, appropriate contractual and security controls should be used as required by law.

10. Clinical records and traceability

Privè maintains clinical records to support safe, effective and continuous care. Records may include consultation and assessment information, treatment and prescribing records, consent documentation, clinical photographs, product and batch traceability, aftercare, complications and follow-up.

Records should be accurate, relevant and appropriately detailed. Corrections or additions should preserve an appropriate audit trail where the system permits, rather than obscuring the original clinical record.

11. Complaints, complications, incidents and learning

Information relating to complaints, complications, incidents, near misses and patient-safety concerns may be processed as part of the clinical record and/or within Privè's governance records. It may be used for investigation, risk assessment, complaint resolution, clinical review, legal or insurance advice, appropriate regulatory reporting, audit, trend analysis and organisational learning.

Where identifiable information is not necessary for wider learning, reporting or quality improvement, Privè should use anonymised or appropriately minimised information wherever reasonably practicable.

12. Out-of-hours concerns and emergencies

Where a patient contacts Privè about a potential complication or clinical concern outside normal operating hours, relevant personal and clinical information may be accessed where reasonably necessary to assess risk and facilitate appropriate care. This may include treatment history, product and batch information, clinical images, medication and allergy information and relevant communications.

Where necessary for patient safety, relevant information may be disclosed to another healthcare professional, urgent-care provider or emergency service in accordance with applicable law and professional confidentiality obligations.

13. Service providers and digital systems

Privè may use specialist third-party systems to support patient records, appointments, communications, payments, website hosting, data storage, clinical photography, prescribing, document management, cybersecurity and other operational functions.

Privè should maintain an internal record of the systems and processors actually in use, their purposes, contractual status, processing locations and relevant security arrangements. This published notice should be updated where a material change affects the information patients should receive.

14. International transfers

Some technology or service providers may process information outside the United Kingdom. Where a restricted international transfer occurs, Privè will assess the transfer and use an appropriate lawful transfer mechanism and safeguards where required. Further information about applicable safeguards may be requested using the contact details in this notice.

15. How long information is kept

Privè will retain personal information only for as long as reasonably necessary for the purpose for which it is held, taking account of clinical continuity, professional guidance, legal limitation periods, insurance or indemnity requirements, complaints and litigation, safeguarding, regulatory requirements and patient safety.

Different categories of information may therefore have different retention periods. Privè should maintain an internal retention schedule specifying the applicable period or criteria for material categories of records. Information no longer required will be securely deleted, destroyed or irreversibly anonymised as appropriate.

The right to erasure does not create an automatic right to deletion of an appropriate clinical record where Privè has a lawful basis or obligation to retain it.

16. Information security

Privè will use proportionate technical and organisational measures designed to protect personal information against unauthorised access, inappropriate disclosure, accidental loss, destruction, alteration and unlawful processing.

- appropriate access and authentication controls;
- role-based access where supported;

- secure systems, backups and appropriate encryption;
- audit logging where available and proportionate;
- confidentiality obligations and staff information-governance training;
- incident and personal-data-breach procedures; and
- appropriate due diligence and contractual controls for processors.

No system can eliminate all security risks. Privè therefore keeps its security arrangements under review and will respond to suspected or confirmed information-security incidents.

17. Personal-data breaches

A suspected loss, unauthorised disclosure, inappropriate access or other compromise of personal information will be assessed under Privè's information-security and data-breach arrangements. Where the statutory threshold is met, Privè will notify the Information Commissioner's Office within the applicable period and will notify affected individuals where required by law.

18. Your information rights

Depending on the circumstances and the lawful basis relied upon, you may have rights including:

- the right to be informed about the use of your personal information;
- the right of access to personal information held about you;
- the right to rectification of inaccurate personal information;
- the right to erasure where the statutory conditions are met;
- the right to restriction of processing in applicable circumstances;
- the right to object to particular processing;
- the right to data portability where applicable;
- rights relating to qualifying automated decision-making; and
- the right to withdraw consent where processing is based on consent.

These rights are not absolute and do not apply identically to every processing activity. Privè will explain any applicable limitation or exemption when responding to a request.

You have an absolute right to object to the use of your personal information for direct marketing.

19. Accessing your clinical information

You may request access to personal information Privè holds about you. Privè may need to verify identity before releasing information and may need to consider third-party confidentiality or another lawful exemption. Requests may be made by telephone on +44 7871 889000 or by email to robertmunroe@priveadvancedfacialaesthetics.co.uk.

20. Automated decision-making and artificial intelligence

Where Privè introduces artificial-intelligence or automated technologies into clinical or administrative processes, their use should be subject to appropriate clinical, privacy, security and governance review before implementation.

Privè will provide the information required by law if it undertakes solely automated decision-making that produces legal or similarly significant effects. Automated technology will not be represented as a substitute for appropriate professional clinical judgement.

A Data Protection Impact Assessment should be completed before introducing processing likely to result in a high risk to individuals, including relevant new uses of special-category data or qualifying automated technologies.

21. Children, young people and vulnerable individuals

Where Privè processes information concerning a child, young person or vulnerable individual, additional consideration will be given to age, capacity and competence, parental responsibility where relevant, safeguarding, confidentiality, the nature of the proposed service and applicable legal or professional restrictions. Treatment eligibility and consent requirements operate separately from this Privacy Notice.

22. Website, cookies and third-party content

The Privè website may use cookies and similar technologies for functionality, security, analytics and, where applicable, marketing. Non-essential cookies should be deployed only in accordance with applicable data protection and electronic-communications requirements and the choices offered through the site's cookie controls.

The website may contain links to or embedded content from independent third-party websites. Those organisations may process information according to their own privacy practices. Privè is not responsible for the privacy practices of independent third parties.

23. Changes to this notice

Privè will keep this notice under review and may update it where there are material changes to clinical services, information processing, technology or suppliers, law or regulatory guidance, professional standards or governance arrangements. The current version should be made available through the Privè website and, where appropriate, within the patient journey.

24. Raising a privacy concern

If you have a concern about the way Privè has used your personal information, please contact us first so that we can investigate and respond.

- Telephone: +44 7871 889000
- Email: robertmunroe@priveadvancedfacialaesthetics.co.uk
- Address: Privè Advanced Facial Aesthetics Limited, 6 Drake Circus, Plymouth, Devon PL4 8AQ

You also have the right to raise a concern with the Information Commissioner's Office (ICO), the UK's data protection supervisory authority. Current information about raising a concern is available from the ICO at ico.org.uk.

25. Privacy governance and accountability

Privacy is part of Privè's wider clinical-governance system rather than a website-only exercise. Privè should periodically review its processing activities, lawful bases and Article 9 conditions, patient privacy information, access permissions, processors, international transfers, clinical photography, retention, rights requests, marketing permissions, information-security incidents, personal-data breaches and new technologies.

Material new systems, clinical services or uses of personal information should undergo privacy review before implementation. Where processing is likely to result in a high risk to individuals, an appropriate Data Protection Impact Assessment should be completed before the processing begins.

The objective is that Privè can demonstrate, through proportionate records and controls, that patient confidentiality, clinical information governance and data protection are embedded within its wider approach to patient safety and quality.

26. Document control

- Document owner: Privè Advanced Facial Aesthetics Limited
- Operational privacy contact: Robert Munroe / nominated authorised contact
- Version: 3
- Effective date: 4 September 2026
- Last review: 4 September 2026
- Next review: 4 September 2027
- Approval: To be approved by Privè before publication

Legal framework used in drafting: This notice has been drafted by reference to the UK GDPR and Data Protection Act 2018 framework and current Information Commissioner's Office guidance on transparency, lawful bases and special-category health data. ICO guidance should be checked again at adoption because guidance is updated as legislation and regulatory interpretation develop.

Complaints, Concerns & Patient Feedback Policy

Print-ready revised draft for internal approval

- Policy owner / Complaints Lead: Robert Munroe
- Clinical input: Relevant Privè medical practitioner / clinical lead
- Legal oversight: Privè General Counsel, where appropriate
- External standards framework: JCCP and applicable statutory professional regulators, where relevant
- Version / effective date: Version 3 / 4 September 2026
- Next review: 4 September 2027

Controlled document - review against current law, professional standards and Privè operating procedures before issue.

1. Policy Statement

Privè Advanced Facial Aesthetics Limited ("Privè") is committed to providing patients with a high standard of clinical care, treatment, communication and service. Concerns and complaints are treated as an important source of patient-safety intelligence and organisational learning, not solely as matters of customer service.

Patients have the right to raise concerns, make complaints, seek explanations and provide feedback without fear of disadvantage or less favourable treatment. Privè will respond fairly, openly, proportionately and promptly, while respecting confidentiality, professional obligations and the rights of all individuals involved.

The objectives of this policy are to provide an accessible route for raising concerns; resolve matters at the earliest appropriate stage; identify immediate or emerging clinical risk; investigate formal complaints objectively; support appropriate external escalation; and ensure learning is translated into measurable improvement.

2. Scope

This policy applies to complaints, concerns and material patient feedback relating to Privè services, clinicians, staff, treatment, communication, premises, administration, clinical records, aftercare and associated patient experience. It should be read alongside Privè policies on clinical governance, consent, safeguarding, incident reporting, complications management, medicines management, data protection, duty of candour/open disclosure, and emergency and out-of-hours care.

This policy does not prevent a patient from contacting an appropriate professional regulator, statutory authority, insurer-supported process, the Joint Council for Cosmetic Practitioners (JCCP), law-enforcement body or other organisation with relevant jurisdiction at any time.

3. Principles

- Patient safety takes priority over complaint administration.
- Complaints are assessed according to risk and seriousness, not merely how they are described by the complainant.
- Concerns should be resolved at the earliest appropriate opportunity, but not prematurely closed where investigation or clinical review is required.
- Investigations will be fair, evidence-led, proportionate and free from predetermined conclusions.
- Clinicians and staff will be treated fairly and given an opportunity to provide relevant information.
- Confidentiality will be protected while permitting appropriate investigation, governance, disclosure and escalation.

- Complaints, complications, incidents and near misses will be considered together where this may reveal a wider patient-safety signal.
- Corrective action will be monitored to completion and, where proportionate, its effectiveness will be tested.

4. Raising a Concern or Complaint

Patients are encouraged to raise concerns as soon as reasonably practicable. A concern may be raised with the treating clinician, another appropriate member of the Privè team, or directly with Robert Munroe as Complaints Lead. Complaints may be made verbally or in writing using the contact routes published by Privè.

Where a patient requires assistance to communicate a complaint, Privè will make reasonable efforts to support access to the process. Complaints made by a representative will be handled subject to appropriate authority, confidentiality and data-protection requirements.

5. Resolution at the Point of Service

Where clinically and operationally appropriate, clinicians and staff should seek to resolve concerns at the point of service within the limits of their competence and authority. Resolution may include listening to the concern, acknowledging the patient's experience, providing a factual explanation, clarifying the outcome sought, and agreeing an appropriate next step.

A concern must be escalated rather than informally closed where it raises a potential patient-safety issue, requires clinical review, falls outside the individual's authority, involves a serious allegation, indicates a recurring or systemic problem, or cannot be resolved to the patient's reasonable satisfaction.

6. Formal Complaints and Escalation

A complaint will ordinarily be treated as formal where it cannot appropriately be resolved at the point of service, requires investigation or follow-up, is received in writing and requires a substantive response, the complainant requests formal consideration, or the nature or potential seriousness of the matter warrants formal review.

All formal complaints must be referred to Robert Munroe, Complaints Lead. Relevant complaint documentation must be completed and forwarded without unnecessary delay. Robert Munroe is responsible for coordinating the investigation and resolution of formal complaints and will involve the treating clinician, relevant clinical lead and Privè General Counsel where appropriate to the nature, complexity, risk or legal implications of the complaint.

Where a complaint raises concerns regarding clinical practice, professional conduct, patient safety, prescribing, medicines, safeguarding, advertising, data protection or another matter potentially falling within external jurisdiction, Privè will consider whether notification, consultation or signposting to the relevant body is required or appropriate. This may include the practitioner's statutory professional regulator and/or the JCCP where the practitioner or issue falls within its remit.

7. Immediate Clinical Risk, Out-of-Hours Concerns and Emergencies

Complaint administration must never delay urgent clinical care. If information provided in a complaint or patient contact suggests an acute complication, deterioration or medical emergency, the matter must immediately move into the appropriate clinical pathway.

7.1 Out-of-hours clinical access

Privè should maintain a defined out-of-hours clinical pathway for treatments where clinically significant complications may arise after routine clinic hours. Patients should receive procedure-specific written information explaining expected effects, warning symptoms, how to obtain clinical advice, when urgent review is required and when to bypass Privè and seek urgent NHS or emergency care.

The out-of-hours system should define who receives patient contacts, required clinical competence, access to the relevant clinical record and product/treatment information, arrangements if the treating clinician is unavailable, escalation to senior clinical advice, documentation requirements and follow-up obligations.

7.2 Urgent and emergency escalation

Where symptoms suggest a potentially time-critical complication - including, where relevant, suspected vascular compromise, visual disturbance, acute neurological symptoms, anaphylaxis, rapidly progressive swelling, severe infection, tissue compromise or other serious deterioration - clinical escalation must take priority over the complaints process. Patients should be directed to the clinically appropriate urgent or emergency service without avoidable delay.

7.3 Documentation and governance

Any out-of-hours or emergency contact associated with a complaint must be documented in the clinical record and, where appropriate, recorded within Privè's complications or incident systems. The subsequent complaint investigation should consider whether aftercare information, contact arrangements, clinical response, escalation and handover operated as intended.

8. Acknowledgement and Timeframes

Privè aims to acknowledge formal complaints within 48 hours. The acknowledgement should identify the person handling the complaint, explain the intended process and provide a reasonable indication of expected timescale.

Where an issue requiring external notification or consultation is identified, Privè aims to take the relevant action within three days of identifying that requirement, subject always to any shorter mandatory reporting period.

Privè aims to investigate and resolve formal complaints within 30 days. Where a complaint remains unresolved for 20 days, an appropriate progress update should be provided. If complexity prevents completion within 30 days, the complainant should be informed of the reason and given a revised expected timeframe.

9. Initial Risk Assessment

Following receipt of a formal complaint, Robert Munroe will ensure that the issues raised are assessed, with relevant clinical and legal input where appropriate, to determine:

- whether there is an immediate or continuing risk to the patient or others;
- whether urgent clinical review or other protective action is required;
- the seriousness and potential consequences of the matter;
- whether similar events or concerns have previously occurred;
- whether the complaint may constitute a complication, incident, near miss or safeguarding concern;
- whether insurers, professional regulators, JCCP or another competent body should be notified or consulted;
- the appropriate scope, level and independence of the investigation; and
- any immediate containment or risk-control measures required.

The risk assessment and decisions arising from it should be documented proportionately.

10. Investigation

Formal complaints will be investigated fairly, objectively and proportionately. The investigation should establish what occurred, why it occurred, where this is material, whether the relevant clinical and organisational controls operated as intended, and what action is required.

- the complainant's account and desired outcome;
- clinical records, consent documentation and treatment records;
- photographs and other relevant clinical evidence;
- communications, appointment records and aftercare information;
- accounts from clinicians and staff involved;
- relevant policies, protocols, product information and professional standards;
- prescribing, medicines and product traceability where relevant;
- out-of-hours contacts and escalation records;

- previous related complaints, complications, incidents or near misses;
- expert or independent clinical/legal input where proportionate; and
- contributory systems factors and opportunities for prevention.

The depth of investigation should be proportionate to actual and potential harm, complexity, recurrence, public-protection implications and learning potential.

11. Fairness to Clinicians and Staff

Individuals whose practice or conduct is the subject of a complaint should be informed of the substance of the concerns where appropriate, given a fair opportunity to provide relevant information, and not subjected to predetermined judgement. They may seek advice from their professional association, indemnity provider or other appropriate adviser.

Where concerns about professional competence, conduct, health or fitness to practise arise, these should be considered separately from the service complaint and escalated through the appropriate professional, employment/contractual, insurance and external-regulatory routes.

12. Open Disclosure and Communication

Privè is committed to open, factual and respectful communication. Explanations should be based on information established at the relevant stage and should not speculate or attribute blame prematurely.

At the conclusion of the investigation, the complainant should receive an appropriate written response setting out the issues considered, the findings, relevant explanation, any remedial action, learning or improvement identified, and any appropriate route for further review or external escalation. Where something has gone wrong, applicable professional or statutory candour obligations should be considered and met.

13. External Review, JCCP and Professional Regulators

Privè will first seek to resolve complaints directly where appropriate. However, an external route may be relevant where the complaint raises serious patient-safety or professional-practice concerns, involves a matter requiring greater independence, cannot be resolved internally, or falls within the jurisdiction of an external body.

Where relevant, Privè may signpost a patient to the JCCP's process for raising a concern about a registrant. JCCP registrants are subject to its Code of Practice and Fitness to Practise arrangements. Where the practitioner is a regulated healthcare professional, the relevant statutory professional regulator may also have jurisdiction.

Privè will avoid describing JCCP, a professional regulator or any other external body as an alternative dispute resolution provider unless that accurately reflects the body's legal role and the circumstances of the complaint.

14. Records, Confidentiality and Data Protection

Privè will maintain secure and proportionate complaint records. These may include correspondence, investigation notes, risk assessments, clinical evidence, findings, external notifications, actions and evidence of closure.

Complaint information will be accessible only to those who reasonably require it for clinical care, investigation, governance, legal/insurance purposes or another lawful function. Medical-record access, disclosure and third-party requests will be handled in accordance with applicable data-protection law, confidentiality obligations and Privè's current privacy and records-management arrangements.

Complaint records should be retained and disposed of in accordance with Privè's approved retention schedule and any applicable clinical, legal, insurance or professional requirements.

15. Complaints, Complications, Incidents and Near Misses

Privè will not assume that a complaint is an isolated service issue. Where appropriate, complaint information should be triangulated with complications, incidents, near misses, unplanned reviews, emergency contacts, out-of-hours contacts, prescribing concerns, patient feedback and audit findings.

A complaint may therefore generate a parallel clinical-governance record where the underlying matter represents a complication, incident or near miss. Conversely, an adverse clinical outcome should not be excluded from governance review simply because the patient has not made a complaint.

16. Corrective and Preventive Action

Where an investigation identifies a material deficiency or improvement opportunity, Privè should record and monitor corrective and preventive action. Significant actions should identify the issue, risk, immediate containment where required, action owner, deadline, evidence of completion and, where proportionate, an effectiveness review.

Actions should not be treated as complete merely because a task has been performed; for significant risks, Privè should consider whether the change has actually reduced the identified risk.

17. Reporting and Organisational Learning

Robert Munroe and Privè General Counsel, where appropriate, will review complaints information to identify trends, recurring issues, learning and outstanding actions. Relevant themes should be reported into Privè's clinical and senior governance arrangements and communicated to clinicians and staff where this supports improvement.

Anonymised complaint case studies may be used for education, clinical governance, audit and professional appraisal where appropriate. Material learning should be considered alongside other patient-safety intelligence rather than in isolation.

18. Monthly and Annual Review

Privè should maintain periodic oversight of complaint volume, themes, severity, timeliness, outcomes, external escalation, related complications/incidents and outstanding corrective actions. Significant or recurrent themes should be considered at relevant clinical and senior-management meetings.

At least annually, Privè should review the effectiveness of the complaints framework, including whether complaint handling is timely and fair, whether recommendations are implemented, whether recurring concerns are reducing, and whether changes to law, services, professional standards or organisational structure require policy revision.

19. Training and Competence

All clinicians and relevant staff should understand how to recognise, receive, document and escalate concerns. Training should cover communication, confidentiality, clinical-risk escalation, safeguarding, open disclosure, documentation, out-of-hours/emergency escalation and the distinction between complaints, complications, incidents and near misses.

Understanding of the process should form part of induction and be refreshed periodically. Emergency and out-of-hours pathways should be tested through proportionate simulation or scenario review, with deficiencies entered into Privè's improvement process.

20. Policy Review and Change Control

This policy will be reviewed at least annually and sooner following a significant complaint or incident, material change in organisational structure, change to Privè's treatment portfolio, change in law or professional standards, or where an audit identifies that revision is required.

Before introducing a materially new treatment or changing the clinical purpose of an existing service, Privè should assess any additional regulatory, registration, professional, insurance, emergency, prescribing, consent, complication-management and complaints requirements. This ensures that the regulatory perimeter is reassessed as services evolve rather than assumed to remain static.

21. Professional and Standards References

- General Medical Council - Good medical practice (current edition).
- Nursing and Midwifery Council - The Code (current edition), where applicable.

- Joint Council for Cosmetic Practitioners / CPSA - applicable Code of Practice and modality/premises standards, where relevant.
- Applicable standards and guidance of other statutory professional regulators relevant to Privè practitioners.
- Applicable data-protection, confidentiality, consumer-protection and medicines requirements.
- Privè internal policies on clinical governance, complications, incidents, medicines, consent, safeguarding, data protection and emergency/out-of-hours care.

22. Document Control

- Policy owner / Complaints Lead: Robert Munroe
- Clinical input: Relevant Privè medical practitioner / clinical lead according to the matter under review
- Legal oversight: Privè General Counsel, where appropriate
- External standards framework: JCCP and applicable statutory professional regulators, where relevant
- Approved by: Robert Munroe / [insert formal approval authority if different]
- Version: Version 3
- Effective date: 4 September 2026
- Next review date: 4 September 2027

Appendix A - Complaint Handling Flow

- 1. Concern received
- 2. Immediate clinical/emergency risk screened
- 3. If urgent: activate clinical/out-of-hours/emergency pathway first
- 4. If suitable: attempt proportionate point-of-service resolution
- 5. If formal: refer to Robert Munroe, Complaints Lead
- 6. Acknowledge within 48 hours
- 7. Risk assessment and investigation plan
- 8. Investigate and triangulate with clinical-governance information
- 9. External notification/signposting where required or appropriate
- 10. Written outcome and remedial action
- 11. Corrective/preventive action tracked
- 12. Learning reported and effectiveness reviewed

Appendix B - Out-of-Hours / Emergency Assurance Checklist

- Patients receive treatment-specific warning signs and emergency instructions.
- A defined out-of-hours contact route is available for relevant treatments.
- The receiving clinician can access the patient record and product/treatment information.
- Cover exists when the treating clinician is unavailable.
- Escalation criteria distinguish routine, urgent and emergency presentations.
- Time-critical symptoms are directed immediately to appropriate emergency care.
- Out-of-hours contacts are documented in the clinical record.
- Relevant contacts also enter the complications/incident system.
- The pathway is periodically tested through simulation or scenario review.
- Deficiencies generate documented corrective action and re-test where appropriate.

Appendix C - Management Information for Periodic Review

- Number and category of complaints.
- Severity / patient-safety risk grading.
- Acknowledgement and resolution times.
- Complaints linked to complications, incidents or near misses.
- Out-of-hours and emergency contacts arising from treatment.
- External notifications or referrals.
- Recurring treatment, product, practitioner or systems themes.
- Corrective actions due, overdue and completed.
- Repeat findings after corrective action.
- Patient feedback and improvement themes.

Drafting note: This document is designed as a controlled clean redraft based on the governance facts confirmed for Privè. Final issue should follow internal verification of operational contact details, forms, records-retention arrangements, professional-register status and current linked policies.

Press, Media & Toskani Recognition

A curated archive of verified editorial coverage, interviews, awards and industry recognition relating to TOSKANI and TOSKANIMED. Independent/editorial coverage is kept separate from awards, sponsored content and brand-owned announcements so the provenance of each item is clear.

Independent Press & Editorial Coverage

Haute Beauty by Haute Living - The Next Big Thing In Aesthetics? TOSKANI's LUMICEN And The Power Of PDRN

26 February 2025. Doctor's Talk / Beauty News feature on Lumicen, PDRN and regenerative aesthetics. View source

Haute Beauty by Haute Living - EXCEEDing Industry Standards: The Future Of Microneedling With Toskani Powered Mesotherapy

15 April 2025. Feature on mesotherapy, EXCEED and TOSKANI-powered treatment protocols. View source

Haute Beauty by Haute Living - Revealing Radiance: The Science-Backed Way To Transform Your Skin

1 July 2025. Feature discussing TOSKANI Lumicen PDRN in a post-procedure regenerative skin protocol. View source

Haute Beauty by Haute Living - Spring Reset: Aesthetic Trends for Renewal

20 March 2026. Editorial feature referencing Toskani Med professional peels, ECPR and Lumicen within regenerative spring protocols. View source

Empresa Exterior - Toskani triumphs at the Aesthetic Awards 2024 in Greece

18 March 2024. International-business coverage of TOSKANI and Medidrops Group recognition at the Aesthetic Awards 2024. View source

Beauty Market - Toskani, galardonada en los premios Aesthetic Awards 2024 que se entregan en Grecia

19 March 2024. Spanish beauty-industry coverage of TOSKANI's NCPR and Radiance Daily Cream awards. View source

Magazine Startups - Toskani, galardonada en los premios Aesthetic Awards 2024 que se entregan en Grecia

19 March 2024. Business/media report on TOSKANI's 2024 Aesthetic Awards recognition in Greece. View source

Professional & Sponsored Media

The Aesthetic Guide - Regenerative Medicine: The Synergy Between Aesthetic Pharmaceuticals and Technologies

13 February 2024. Sponsored by Toskani US; professional trade feature on TOSKANI products, Lumicen, mesotherapy and the EXCEED device. View source

The Aesthetic Guide - TOSKANI USA Interview

5 December 2024. 14-minute professional video interview, originating from The Aesthetic Guide Theater at AMWC Americas 2024. View source

Awards & Industry Recognition

Aesthetic Awards 2024 - Greece

TOSKANI NCPR received Gold for Non-Invasive Mesotherapy Product; Toskani Radiance Daily Cream received Silver in the whitening-product category. Medidrops Group was also recognised as Aesthetic Company of the Year. View source

Medical Beauty Awards 2025

Medidrops Group with ToskaniMed & Toskani received Gold for Most Innovative Non-Invasive Treatment for the Lumicen + TKN MesojectGun combination. ToskaniMed TKN HA3 received Bronze for Best Skin Booster Product. View source

The Aesthetics Awards 2026 - UK & Ireland

ToskaniMed Lumicen Boost Serum, represented by The Glow Group, was named a finalist in the Best New Innovative Product category. View source

Industry Appearances & Brand News

AMWC Americas 2024

The official AMWC Americas 2024 schedule included The Aesthetic Guide Theater - TOSKANI USA. View source

IMCAS Paris 2026

TOSKANI documented its participation at IMCAS World Congress Paris 2026, presenting professional skincare, regenerative actives, mesotherapy, peels and skin-booster protocols. View source

TOSKANI Press Day - Madrid 2026

TOSKANI documented a Madrid Press Day showcasing the Toskani and Toskanimed portfolio to media and professional audiences. View source

Cosmoprof Worldwide Bologna

TOSKANI has a documented history of exhibiting at Cosmoprof Worldwide Bologna; its 2019 presence is also recorded in the official exhibitor list. View source

Privè & Toskani Centre of Excellence

Privè publicly identifies itself as the first Toskani Med Centre of Excellence in the UK & Ireland. This distinction is presented separately from independent press, awards and third-party editorial coverage.

Privè Toskani History

Archive Note

This archive includes verifiable, publicly indexed coverage identified up to September 2026. Duplicate syndications, retailer product pages, social reposts and unverified mentions are not presented as separate press articles.

Media Enquiries

Journalists, editors, broadcasters and professional publications are welcome to contact Privè for appropriately qualified commentary on aesthetic medicine, regenerative skin health, patient safety and professional standards.

Reference & Publication Notes

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