

Authentic Aesthetics  
WORLD-CLASS · REJUVENATION · THERAPY

PRIVACY · DATA · MARKETING

# Privacy & Marketing Data Policy

*Meta (Facebook & Instagram) Lead Ads · WhatsApp Business Platform · POPIA · GDPR*

*Version 1.0 · Effective 25 May 2026*

# Executive summary

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This document sets out the lawful basis, consent flow, data-handling rules and messaging conduct that Authentic Aesthetics applies when collecting guest leads through Meta (Facebook and Instagram) Lead Ads and contacting those guests via the WhatsApp Business Platform. It is written to satisfy the WhatsApp Business Messaging Policy, the WhatsApp Business Solution Terms, Meta's Platform Terms, South Africa's Protection of Personal Information Act (POPIA, Act 4 of 2013) and, where applicable, the EU General Data Protection Regulation (GDPR).

If WhatsApp has temporarily restricted, rate-limited or paused the business account, this policy — together with the operational evidence listed in Appendix B — is the primary document submitted in the appeal.

## RESPONSIBLE PARTY

Trading name	Authentic Aesthetics
Information Officer	Dr Yusra Khan (Chief Medical Officer)
Contact email	privacy@authenticaesthetics.co.za
Contact number	+27 21 696 0900
Physical address	Cape Town, South Africa
Meta Business ID	On file with Meta Business Manager
WhatsApp Display Name	Authentic Aesthetics

## 1. Scope of this policy

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This policy governs all personal information that Authentic Aesthetics collects, stores, uses or shares for marketing purposes, specifically through:

- Meta Lead Ad campaigns on Facebook and Instagram (instant forms and click-to-WhatsApp ads).
- The WhatsApp Business Platform (Cloud API and Business App) for first-response, booking confirmations, treatment reminders and consent-based promotional updates.
- Forms hosted on authenticaesthetics.co.za, including the newsletter ('The Gold List'), enquiry form and GLP-1 virtual consultation flow.
- Inbound communication originating from a guest (calls, WhatsApp, DMs, walk-ins).

## 2. Lawful basis for processing

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Authentic Aesthetics relies on one of the following legal grounds for every act of processing. The applicable ground is recorded in the CRM at the moment of capture.



Consent	Newsletter sign-up; promotional WhatsApp opt-in; marketing cookies.	Timestamped opt-in record, source URL or ad ID, IP address.
Contract	Booking, payment, treatment delivery and follow-up care.	Signed consent forms, Fresha booking ID, invoice.
Legal obligation	Clinical record-keeping under the Health Professions Act.	Patient file retained for the statutory period.
Legitimate interest	Replying to an inbound enquiry; fraud prevention; service-quality review.	Original enquiry message and balancing-test note.

### 3. Meta lead-capture flow

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Every Meta Lead Ad operated by Authentic Aesthetics carries a clear privacy notice and a separate, granular consent box for WhatsApp follow-up. The notice meets Meta's Lead Ads policy and POPIA section 18 disclosure requirements.

#### CONSENT WORDING USED IN-AD

*“By submitting this form, I confirm I am 18 or older and consent to Authentic Aesthetics contacting me by WhatsApp, phone and email about the treatment I have enquired about. I have read the Privacy Policy at [authenticaesthetics.co.za/privacy](https://authenticaesthetics.co.za/privacy) and understand I can opt out at any time by replying STOP.”*

#### AD-LEVEL DATA CAPTURED

- Full name, mobile number (E.164 format), email address.
- Treatment of interest (single-select).
- Preferred contact window (morning / afternoon / evening).
- Campaign ID, ad set ID, ad ID and click timestamp — for attribution and audit.

#### SPECIAL-CATEGORY DATA

Lead Ads never request health information, identity numbers, financial data, biometric data or photographs. Any clinical detail required for treatment is collected later, inside the secure consultation flow, under signed clinical consent.

### 4. WhatsApp Business Platform conduct

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Authentic Aesthetics operates within the WhatsApp Business Messaging Policy and the WhatsApp Commerce Policy. The following operational rules are enforced for every outbound message.

#### OPT-IN FIRST

No outbound message is sent unless the recipient has provided a documented opt-in within the preceding twelve months, captured through a Meta Lead Ad, the website or an in-clinic form.

#### 24-HOUR CUSTOMER-CARE WINDOW

Free-form replies are sent only inside the 24-hour window opened by the guest. Outside that window, only pre-approved message templates are used.

#### APPROVED TEMPLATES ONLY

All marketing, utility and authentication templates are submitted to and approved by Meta before use. No template is edited at send-time.

#### CLEAR SENDER IDENTITY

Every first message identifies Authentic Aesthetics by name, states the reason for contact and references the originating ad or enquiry.

#### HONOUR OPT-OUTS IMMEDIATELY

Replies containing STOP, UNSUBSCRIBE, REMOVE, CANCEL, END or QUIT (any case, any language) trigger automatic suppression in the CRM within 60 seconds and are never messaged again for marketing purposes.

### **NO BULK COLD OUTREACH**

Numbers scraped from third-party lists, purchased databases or public directories are never imported into the WhatsApp Business account.

### **FREQUENCY CAP**

A guest receives no more than two marketing-category template messages per calendar month, in addition to transactional booking and reminder messages they have requested.

### **PROHIBITED CONTENT**

No prescription-medicine promotion, no before/after imagery without written model release, no misleading clinical claims, no financial-product cross-promotion.

## 5. Opt-in evidence retained

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For every WhatsApp recipient, the following five fields are stored in the CRM and are produced on request during any Meta or WhatsApp review:

Field	Example
Source	Meta Lead Ad — Campaign ID 23859...
Consent statement shown	Verbatim copy of the in-ad notice (section 3).
Timestamp (UTC)	2026-05-12T14:33:08Z
IP address / device	102.65.x.x · iPhone 15, iOS 18.2
Channel of consent	WhatsApp marketing — explicit checkbox ticked

## 6. Data storage, security and retention

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- **Hosting.** Lead and CRM data is stored on Lovable Cloud (Supabase, EU region) with row-level security, encrypted in transit (TLS 1.3) and at rest (AES-256).
- **Access control.** Role-based access (RBAC) restricts marketing data to the marketing lead and information officer; clinical staff cannot access marketing fields.
- **Backups.** Daily encrypted backups retained for 30 days; point-in-time recovery enabled.
- **Sub-processors.** Meta Platforms Ireland Ltd. (lead delivery), WhatsApp Ireland Ltd. (messaging transport), Fresha (booking), Stripe (payments). Each is bound by its own DPA.
- **Retention.** Marketing leads are retained for 24 months from last engagement, then permanently deleted. Clinical records follow the HPCSA statutory retention period.
- **Breach response.** Any suspected breach is reported to the Information Regulator of South Africa within 72 hours, in line with POPIA section 22.

## 7. Guest rights

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Every guest may, at any time and at no cost: request a copy of the personal information held about them; ask for correction or deletion; withdraw consent; object to direct marketing; or lodge a complaint with the Information Regulator (inforeg@justice.gov.za). Requests are actioned within 30 days.

## 8. Staff training & internal controls

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- Every team member with WhatsApp Business access completes a 45-minute onboarding on this policy and signs a written acknowledgement.
- Quarterly refresher on Meta and WhatsApp policy changes.
- Template library is reviewed monthly; expired or rejected templates are archived.
- All outbound campaigns are signed off by the information officer before launch.

## Appendix A — Approved message templates

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The following templates are pre-approved by Meta and represent the only marketing or utility content sent from the WhatsApp Business account.

Category	Template (variables in braces)
Utility — Lead reply	Hi {{1}}, this is Authentic Aesthetics responding to your enquiry about {{2}}. Would you like to book a complimentary 15-minute consultation? Reply YES to confirm or STOP to opt out.
Utility — Booking confirmation	Hi {{1}}, your {{2}} appointment is confirmed for {{3}} at {{4}}. To reschedule, reply RESCHEDULE. Reply STOP to opt out of reminders.
Utility — Reminder	Hi {{1}}, a gentle reminder of your {{2}} tomorrow at {{3}}. Please arrive 10 minutes early. Reply STOP to opt out.
Marketing — Seasonal offer	Hi {{1}}, our {{2}} programme has limited slots for {{3}}. Reply BOOK for availability or STOP to opt out. — Authentic Aesthetics

## Appendix B — WhatsApp account-review appeal pack

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If the WhatsApp Business account is restricted or its quality rating drops, the following evidence is submitted with the appeal through the WhatsApp Manager → Account Quality → Request Review flow.

1. This Privacy & Marketing Data Policy (PDF).
2. Screenshots of the Meta Lead Ad form, including the visible consent notice.
3. CSV export of the most recent 200 opt-in records with the five fields from section 5.
4. Library of approved message templates and their Meta approval IDs.
5. Copy of the published privacy policy URL: [authenticaesthetics.co.za/privacy](https://authenticaesthetics.co.za/privacy).
6. Statement of frequency caps and opt-out handling (section 4).
7. Information Officer contact details and signed acknowledgement of the policy.

### DECLARATION

Authentic Aesthetics confirms that all messaging sent through the WhatsApp Business Platform is based on prior, documented opt-in; that no third-party or purchased data is used; that opt-outs are honoured within 60 seconds; and that the business operates in full compliance with the WhatsApp Business Messaging Policy, the WhatsApp Commerce Policy and POPIA.

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Dr Yusra Khan

Date

Information Officer, Authentic Aesthetics