

SKINN AI LONDON™

DATA PROTECTION IMPACT ASSESSMENT (DPIA)

AI-Powered Cosmetic Skin Analysis Service

Date: 15 June 2026 | Version: 2.0 | Prepared by: Levent Ustun

1. Overview and Purpose

This Data Protection Impact Assessment (DPIA) has been prepared in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. It relates to the processing of personal data by SKINN AI LONDON™ through its AI-powered cosmetic skin analysis service available at skinnai.co.uk.

Field	Details
Organisation	SKINN AI LONDON™
Data Controller	Levent Ustun — Data Analyst & AI Developer
Website	https://skinnai.co.uk
Contact Email	hello@skinnai.co.uk
Contact Phone	+44 7759 409000
Date of DPIA	15 June 2026
Version	2.0
ICO Registration	Pending — Application in progress
Registered In	England & Wales

2. Description of Processing

2.1 What Does the Service Do?

SKINN AI LONDON™ provides an AI-powered cosmetic skin analysis service. Users voluntarily upload a facial photograph which is processed by Anthropic’s Claude Vision AI to generate a personalised cosmetic skin report. The service analyses visible cosmetic skin characteristics such as hydration levels, UV damage indicators, texture, tone, and other cosmetic skin parameters.

Important clarification: SKINN AI LONDON™ does NOT use facial recognition technology, does NOT identify or verify individuals, and does NOT create biometric templates. The system analyses what the skin looks like — not who the person is. This is fundamentally different from biometric identification systems.

2.2 Nature of Data Processed

- Facial photographs (voluntarily uploaded by the user for cosmetic analysis)
- Email address (for report delivery only)
- Cosmetic skin analysis results and skin score
- Technical data (IP address, device type, browser — standard web logs)

2.3 Is This Biometric Data Under UK GDPR?

UK GDPR Article 4(14) defines biometric data as: personal data resulting from specific technical processing relating to the physical or physiological characteristics of a natural person, which allows or confirms the unique identification of that natural person.

SKINN AI LONDON™ does NOT uniquely identify individuals from photographs. The AI analyses cosmetic skin properties only. Therefore, the data processed is personal data (a photograph) but is NOT biometric data in the legal sense under UK GDPR. The lawful basis is Consent under Article 6(1)(a).

2.4 How is the Data Processed?

- User voluntarily uploads a facial photograph via the website
- The photograph is transmitted securely (HTTPS/TLS) to Anthropic's Claude Vision API
- Claude Vision analyses cosmetic skin parameters only — no identity verification occurs
- A personalised cosmetic report is generated and sent to the user's email address
- The photograph is permanently deleted within 24 hours of processing
- No facial data is retained, shared, or used for AI training

2.5 Legal Basis for Processing

Lawful basis under Article 6: Explicit Consent (Article 6(1)(a))

Users provide separate, explicit, informed consent to photo processing before submitting their photograph. This consent is distinct from the Terms & Conditions acceptance and clearly explains: (1) what the photo will be used for, (2) that it will be deleted within 24 hours, and (3) that it is not used for identification.

3. Necessity and Proportionality

3.1 Is Processing Necessary?

Yes. The core service — AI-powered cosmetic skin analysis — cannot be delivered without processing a facial photograph. No less intrusive alternative exists that would provide equivalent cosmetic analysis results.

3.2 Alternatives Considered

- Text-based questionnaire: Insufficient accuracy, cannot detect visual skin conditions
- Non-facial body images: Not suitable for facial skin assessment
- In-person consultation: Not feasible for a digital-first service

3.3 Proportionality

Processing is strictly limited to what is necessary. Photos are deleted within 24 hours. No facial templates are created. No identification occurs. No data is shared with third parties beyond Anthropic (processor) solely for the purpose of cosmetic analysis.

4. Risk Assessment

Risk	Likelihood	Impact	Mitigation
Unauthorised access to photographs during transmission	Low	High	HTTPS/TLS encryption for all data in transit
Data retained beyond 24-hour deletion window	Low	Medium	Automated deletion process; no manual retention
Third-party processor (Anthropic) data breach	Low	High	Anthropic operates under strict security standards
Inaccurate cosmetic analysis causing user concern	Medium	Low	Service clearly labelled as cosmetic guidance only
Minors submitting photographs	Medium	Medium	Terms require users to be 18+; confirmed via consent
Regulatory challenge on data classification	Low	Medium	This DPIA documents our legal position clearly

5. Mitigation Measures

5.1 Technical Measures

- HTTPS/TLS encryption for all data transmission
- Automatic deletion of photographs within 24 hours
- No storage of facial templates or recognition data
- Secure API connection to Anthropic Claude Vision
- Stripe PCI DSS compliant payment processing
- 256-bit SSL certificate

5.2 Organisational Measures

- Explicit, separate photo processing consent obtained before analysis
- Clear privacy policy explaining data use and deletion timeline
- Service positioned as cosmetic guidance only — not medical or identification
- ICO registration application in progress
- This DPIA maintained and reviewed annually
- Users aged 18+ only (confirmed via consent)

5.3 User Rights

- Right to access: Contact hello@skinnai.co.uk
- Right to erasure: Data auto-deleted within 24 hours; immediate deletion on request
- Right to withdraw consent: At any time before photo submission
- Right to complain: Information Commissioner's Office — ico.org.uk

6. Consultation and Sign-Off

This DPIA was prepared by Levent Ustun, founder and data controller of SKINN AI LONDON™. A qualified data protection consultant will be engaged to review this DPIA upon ICO registration.

Field	Details
Prepared By	Levent Ustun
Role	Data Controller & Founder
Date	15 June 2026
Next Review Date	15 June 2027

Status	Active — Pending ICO Registration
Version	2.0

7. Contact Information

SKINN AI LONDON™

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Registered in England & Wales

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