

## Hidden Hearing Privacy Policy

This Website (<http://www.hiddenhearing.co.uk>) is owned and operated by Hidden Hearing Limited.

This Policy explains how we collect and use your information. In this Policy, "we", "us" and "our" means Hidden Hearing Limited.

We may change this Policy from time to time so please check back when you use our services to make sure that you have seen the most up to date version.

If you have any questions about this Policy, or would like to exercise your rights, you can email our Data Protection Officer at [hhgdpr@hiddenhearing.co.uk](mailto:hhgdpr@hiddenhearing.co.uk), telephone us at 0800 0378 989, or use our Website contact form: <http://www.hiddenhearing.co.uk/contact-us/>.

### 1. Who we are

Hidden Hearing Limited is a private limited company incorporated in England and Wales (Company number 01990227), with a registered office at Medway Street, Maidstone, Kent, ME14 1HL.

We are registered with the Information Commissioner's Office (ICO) as a data controller in the United Kingdom, with registration number Z7161992. You can find out more about our registration with the ICO by visiting the [ICO's website](#).

### 2. When do we collect information about you?

Some of the information we collect about you can be used to identify you. This type of information is defined as "Personal Data" under the UK Data Protection Act 1998 and, from 25 May 2018, the EU General Data Protection Regulation (EU) 2016/679. In this Policy we use the words "Personal Information" to talk about your Personal Data.

We collect your Personal Information:

- when you make enquiries or book an appointment through our Website form, purchase products from us through our Website, register for an account on our Website, request a Free Hearing Information Brochure or sign up to receive our newsletter;
- when you visit our Website and cookies are placed on your computer;
- when you make enquiries via the press;
- when you email, call us or write to us, visit our branches or provide us with information in any other way, including by interacting with us via social media such as Facebook, Twitter, Pinterest, YouTube, Google+ or Disqus.
- When a relative or friend gives us information about you during discussions about such person's hearing, or where an individual has indicated that he or she would like you to accompany them to a hearing assessment, hearing aid fitting or service appointment.

We also check your contact information against lists which we receive from third party service providers, or from public sources such as the electoral roll, to make sure that we have recorded your contact details correctly. This helps us to keep our records up to date and ensure that we can provide you with relevant information and services.

### 3. **What types of Personal Information do we collect and process?**

We process the following kinds of personal information if you provide it to us:

- (a) Information about you, including your name, title, postal address, telephone number and email address, and, if you make a purchase with us, credit or debit card details;
- (b) Information about your use of our call centres and your branch visits.
- (c) Information you provide to us during communications you have with us and with our staff, whether by email, post, telephone, in person or through our Website, for example comments or queries about the products and services we provide.
- (d) If you register for a hearing test with us, take our online hearing test; give us information about your hearing in store or, call one of our call centres, or purchase one of our hearing aids you may give us sensitive information about your health. This could include for example whether you currently use a hearing aid and if so what type of hearing aid, information about your hearing condition and where appropriate your family history. **We will only ever collect and use this kind of information with your consent.**
- (e) If you decide to purchase one of our products using credit, we will pass your information to our preferred lender, V12, who will contact you to make further arrangements for this purpose.

Each time you visit the Website we may automatically gather the following information:

- (f) technical information about your computer such as domain name, browser type and version, operating system and platform, IP address, cookie information and time zone setting; and
- (g) information about your visit including the full Uniform Resource Locators (URL) clickstream to, through and from the Website (including date and time), what web pages you visited on the Website and how long you spend on each page, page interaction information (such as scrolling, clicks and mouse-overs), page response times, download errors, traffic data, location data, weblogs, history of resources accessed on the Website, methods used to browse away from the page and information on what websites you visited before accessing the Website.

When a friend or relative gives us information about you this could include for example your name, your relationship to the individual and your comments or reactions to that individual's hearing.

### 4. **Automatic profiling**

When we collect information about you it is stored in our customer relationship management system. This automatically integrates with a program which segments our customers and potential customers into different profile categories. These profile categories, loosely based on information such as post codes, age and requirements affects:

- (a) How often we contact you; and
- (b) The content of our messages and the way that they are written.

This automatic profiling does not disadvantage you in any way: our aim is to make our communications with you as relevant and as tailored as possible, to provide you with a better service. You have the right to opt out of marketing communications at any time. We will always respect your wishes.

5. **Why do we collect and use your information, and what are our lawful grounds for doing so?**

We use your Personal Information for the following purposes:

- (a) To process and respond to requests, enquiries and complaints received by you, in accordance with our legitimate interest to provide our customers with a responsive service.
- (b) To provide services and products requested and/or purchased by you or an attorney on your behalf and to communicate with you or your attorney about such services and/or products. We do this as necessary in order to carry out a contract with you, for the purpose of our legitimate interest to operate a business which offers products and services related to hearing.
- (c) To update our records and for audit purposes, in accordance with our legitimate interest to do so.
- (d) To prevent or detect fraud, in accordance with our legitimate interest to do so.
- (e) Where legally required or where it is in our legitimate interests to do so, to comply with requests from law enforcement and regulatory authorities.
- (f) To analyse trends and profiles, for our legitimate interest to aim to enhance, modify, personalise and improve our services and communications for the benefit of our customers.
- (g) To carry out customer satisfaction research, for our legitimate interest to aim to enhance, modify, personalise and improve our services and communications for the benefit of our customers.
- (h) To recommend products and services we think you will be interested in. For this we use our legitimate interest to carry out direct marketing to our customers or, where we use your health data or electronic methods such as email, with your consent.
- (i) To enable our service providers to carry out any of the purposes set out above on our behalf. Service providers include, for example, call centre operators, website developers, cloud storage providers, mailing house, media agencies. For this processing we use our legitimate interest to run our business as efficiently as possible. Our service providers will always be under a duty to keep your Personal Information safe and confidential.

6. **Where we store your Personal Information**

Our servers are managed by our parent company, William Demant, and are located within the EEA.

## 7. **How we share your Personal Information**

We share your Personal Information with companies within our corporate group. We will only share your Personal Information with unrelated third parties as described in this Policy.

We may share your Personal Information with our service providers for tasks such as:

- (a) assisting us with administering or troubleshooting our Website;
- (b) assisting us with the supply or design of our products or with our business administration;
- (c) assisting us with our marketing campaigns;
- (d) operating our call centres; or
- (e) providing us with electronic or physical storage services or systems.

We will only share your information in these circumstances if it is necessary to do so in order for our service providers to perform the service for us. These companies are not authorised to keep or use your Personal Information for any other purpose.

We may disclose your Personal Information to selected third parties such as law enforcement agencies, regulatory authorities and our professional advisors if we are under a duty to do so in order to comply with any legal obligation, or if it is in our legitimate interests, or in order to enforce or apply our Website Terms of Use or other related contracts with you or your company.

If we sell all or any part of our business, the parties which buy it may have access to your Personal Information.

## 8. **How long do we keep your Personal Information?**

We hold your personal information for as long as we need to for legitimate legal or business reasons, including to comply with any regulatory obligations. [Depending on the record types and our relationship with you, retention periods range from 3 months to 10 years, or for the period during which you request our services.]

If you would like more detailed information about our retention policy, please email us at [hgdpr@hiddenhearing.co.uk](mailto:hgdpr@hiddenhearing.co.uk) or use one of the other methods in the "Contact us" section below.

## 9. **Security**

We aim to keep your Personal Information secure. In order to prevent unauthorised access or disclosure, we use appropriate physical, technical and organisational measures to keep the Personal Information we collect secure. Our service providers are required to do the same.

Unfortunately, transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Information once we receive it, we cannot guarantee the security of your Personal Information transmitted to our Website; any

transmission is at your own risk. Once we have received your Personal Information, we will use strict procedures and security features to try to prevent unauthorised access or loss.

10. **Cookies**

Our Website uses cookies to distinguish you from other users of the Website, to provide you with a good experience when you browse the Website, and also to help us to improve the Website. Please see our [cookie policy](#) for more information.

11. **Links to other websites**

The Website may contain links to the websites of other companies and organisations which may be of interest (“**Third Party Sites**”).

Once you have used these links to leave our Website, we do not have any control over how other companies use your Personal Information collected through such Third Party Sites. We cannot therefore be responsible or liable for the protection and privacy of any Personal Information which you provide whilst visiting them.

Third Party Sites are governed by their own privacy policies. Please be careful when accessing Third Party Sites and make sure that you check the applicable privacy policies.

12. **Controlling your Personal Information**

You have the right to ask us not to process your Personal Information for marketing purposes.

We will usually inform you (before collecting your data) if we intend to use your data for such purposes, or if we intend to disclose your information to any third party for their own marketing purposes.

You can tell us that you do not want to receive information about related goods and services, either from us or from third parties by ticking the relevant boxes on the forms we use to collect your Personal Information.

You can ask us to stop sending you marketing communications at any time by contacting us here [hhgdpr@hiddenhearing.co.uk](mailto:hhgdpr@hiddenhearing.co.uk) or 0800 0378 989

We will never sell your Personal Information, and we will only share your Personal Information as described in this Policy.

If we are processing your Personal Information on the basis of your consent, you have the right to withdraw your consent at any time.

13. **Access to your Personal Information, deletion, restriction, rectification and transfer**

You have the right to request details (and a copy of) the Personal Information we hold about you and to ask us to delete, restrict, correct (rectify) or transfer (port) your Personal Information. Our response will depend on which legal grounds we are using to process the data in question, and the circumstances of the particular processing. You can find out

more about your rights by viewing guidance from the Information Commissioner's Office [here](#).

You can exercise your rights by sending us a written request to our contact form [here](#), by emailing us at [hgdpr@hiddenhearing.co.uk](mailto:hgdpr@hiddenhearing.co.uk) or by using any of the other methods set out in our "contact us" section below.

With each request please include identification information (such as a copy of your passport or driving licence and a recent utility bill). If you have particular information in mind, please be as specific as you can so that we can respond to you as quickly as possible.

#### 14. **Complaints to the ICO**

If you are unhappy with us, our service, or with the way that we treat your Personal Information please contact us and we will work with you to resolve your issue.

You also have the right to contact the UK data protection authority, the Information Commissioner's Office (ICO). You can contact the ICO through its website: <https://ico.org.uk/global/contact-us/>. You can also call the ICO helpline from the UK on 0303 123 1113, or +44 1625 545 745 if calling from outside of the UK.

#### 15. **Changes to this privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email.

Please check back frequently to see any updates or changes to our Privacy Policy.

#### 16. **Contact us**

If you have any questions on this Policy, or would like to exercise your rights, you can contact our Data Protection Officer, Clare Foster in the following ways:

- email us at [hgdpr@hiddenhearing.co.uk](mailto:hgdpr@hiddenhearing.co.uk)
- telephone us at 0800 0378 989,
- use our Website contact form: <http://www.hiddenhearing.co.uk/contact-us/>, or
- write to us at:

Claire Foster, Data Protection Officer

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