

# Privacy policy

At Lisburn Hearing Centre, we care about your privacy.

As part of the relationship, you have with Lisburn Hearing Centre, we will collect personal information about you and your hearing. We want to let you know that we respect the information you provide us with and that it is important to you to know how it is collected, used and protected.

As part of the new EU data protection laws (GDPR) we have provided this Privacy Policy that you can refer to for any queries you may have about your personal information.

We may update this Policy from time to time to keep in line with any changes to legislation or to our use of your data. If you have any questions about our Privacy Policy and practices, please contact us at either: -

**lisburnhearing@btconnect.com or in writing to Data Protection Administrator,**

**Lisburn Hearing Centre, 2a Smithfield Square. Lisburn Co. Antrim BT28 1TH, our registered business address.**

## 1. Who are we?

We are Lisburn Hearing Centre, an Independent hearing healthcare provider, we supply, and fit hearing aids tailored to an individual's needs, helping customers in Northern Ireland. We have experience in providing hearing aid and ear care solutions for individuals suffering with hearing loss since 1996.

## 2. Why do we process the data and under what legal basis will we process your information?

As part of the new EU laws under GDPR, the grounds that we will rely upon in order to process your information are as follows:

**Legal Obligations / Contract** – we may process your information in relation to our obligations to fulfil a contract with you or under a legal obligation arising from the sale of products including those related to after-sales support services and where we are obliged to fulfil obligations or to respond to instructions issued by regulatory or legal bodies.

**Consent** – When you call us or visit us in branch, you will be asked to provide consent for us to collect and process your personal and sensitive data, use your data to send marketing related information that we feel is relevant to you, your hearing and use your data for the purpose of profiling (see our profiling section for more information).

Legitimate Interest – if you are an existing customer, have had a hearing test with us or have enquired about our services and have not previously given us consent for the processing of your data, we will keep and use your data for the purposes of our legitimate interest, provided we have established that those interests are not overridden by your rights and freedoms, including your right to have your information protected. Our legitimate interests include processing orders for any of our services or products, optimising our website and customer experience, informing you about relevant products, offers and promotions via mail and phone and ensuring that our operations are conducted in an appropriate and efficient manner.

### 3. How do we collect information from you?

There are several ways of collecting the information:

Website – You may submit your personal details through one of our online forms when requesting further information or booking an appointment at one of our branches.

Contact Centre – Our team will ask you to provide personal details for us to book you in for an appointment and/or send you further information.

Third party collection – We work with selected third-party service providers who collect information on our behalf from contacts who are interested in private hearing care.

In branch – If you visit one of our branches, the branch co-ordinator or Audiologist will ask you to provide personal details in order to book an appointment.

### 4. What type of information do we collect from you?

The type of information we collect from you can be grouped as the following:

Personal Data – We will collect information such as your name, address, email address, IP address and information about what webpage you have looked at and when.

Sensitive Data – As part of our service, we will undertake a hearing test which will produce a set of results about the health of your hearing. We will then keep a record of these results, so we are able to understand your needs as best as possible as well as refer to them in subsequent appointments and tests.

### 5. How is your information used?

We may use your information to:

Process orders for any of our services/products.

Communicate with you about any competitions you may have entered.

Send you confirmation and reminders about your appointment dates and times.

Seek your views and/or comments on the services we provide.

Inform you of any changes to our services or branch locations.

Send you communications which you have signed up for and that may be of interest via mail, email, phone or SMS. When you visit a branch for your hearing test, you will be given the opportunity to opt "in" to our marketing communications and choose the types of marketing channels that you would like us to use for contacting you. If at this point you do not give us permission, then we will not send any marketing communication to you. If you request marketing information through our digital channels, then you will be required to opt in and choose your marketing channel preferences.

#### 6. Who has access to your information?

Your data will be dealt with by Lisburn Hearing Centre employees or contracted staff who are adequately trained and instructed to deal with safe and secure processing of customer information and are also bound by a duty of confidentiality.

Third party service providers working on our behalf - In some circumstances, we do share contact information with third party service providers, subcontractors and other associated organisations who work on our behalf to book appointments for Lisburn Hearing Centre customers into our branches and send marketing communications. We may also use third party service providers to help with repairs and service queries that may arise with any of the products we supply. In these cases, we will only ever provide enough information that is necessary to deliver the service. We will also have a contract in place to ensure that any shared data is kept secure and that it is not used for their own marketing purposes.

In certain circumstances, Lisburn Hearing Centre may transfer your personal data to group companies located in countries that do not belong to the European Union or the European Economic Area. In this circumstance, we will adopt contractual guarantees (such as the signing of standard contractual clauses approved by the EU Commission) signed with the foreign company receiving the data; these clauses ensure a level of data protection as set by European legislation.

We will not sell or rent your information to third parties.

We will not share your information with third parties for their own marketing purposes.

#### 7. The rights you have relating to your information

You have the right to:

Be informed of how and why we use your data who we share your data with if applicable and under what legal basis we process your data. These details are all contained within this Privacy Policy.

Access your personal information and to confirm the nature of the information and how it is used. There are circumstances, under GDPR laws, where we can refuse your request or certain elements of your request. If this is the case, we will inform you of our reasons for doing so.

Change your personal information if it is inaccurate. You can let us know by sending your request to the email address or postal address set out below.

Have your personal and/or sensitive data deleted (e.g., if the information is no longer necessary for the purposes for which it was collected or processed)

Restrict processing of your data if required. If you request this, we still store your personal data but no further processing of it would be carried out.

Object to our processing of your Information by contacting us at the address or email address set out below. For example, if we are processing your Information based on our legitimate interests and there are no compelling legitimate grounds for our processing which override your rights and interests.

The right to withdraw the consent for the processing of your Information for direct marketing purposes at any time. For email and SMS, you will be given the opportunity to unsubscribe or opt out in the content of the messaging.

Receive any Information that we hold about you in a structured, commonly used and machine-readable format. You can ask us to transmit that Information to you or directly to a third-party organisation. This right exists in respect of Information that you have provided to us previously; and is processed by us using automated means please note that we would never process your data on a fully automated basis.

While we are happy for such requests to be made, we are not able to guarantee technical compatibility with a third-party organisation's systems. We are also unable to comply with requests that relate to Information of others without their consent.

Please be aware that if you do object to the processing of all or selected parts of your data by Lisburn Hearing Centre, we may not be able to provide you with adequate hearing care services or communicate with you about relevant products, services, offers and/or promotions that we feel are relevant to you.

To exercise any of your rights mentioned above, you will need to contact us at: - Lisburn Hearing Centre 2a Smithfield Square. Lisburn Co. Antrim BT28 1TH or [lisburnhearing@btconnect.com](mailto:lisburnhearing@btconnect.com)

## 8. How your information will be protected

When you give us personal information, we take steps to ensure that it is treated in a secure way. We ensure that we complete a regular review of our processing activities which includes staff awareness and training on all our data protection policies and procedures. We also ensure that we complete internal audits and checks on these procedures so that you can be confident that your information is always kept safe and secure. This includes across all websites and back-office systems.

We will always ensure that your information is processed meeting the following requirements,

Processed lawfully, fairly and in a transparent manner.

Collected for specific, explicit and legitimate purpose.

Adequate, relevant and limited to the purpose it is collected.

Accurate and up to date

Kept in a form which permits identification of the individual for no longer than is necessary.

Processed in a manner that ensures appropriate security against unlawful processing, accidental loss, destruction or damage.

Whilst we will try to ensure that your information is protected, we cannot guarantee the security of the information you send to us, and you do so at your own risk. Once it has reached us, we have stringent processes in place to ensure that your personal information on our systems meets industry security standards.

#### 9. Profiling

We may use the data we collect from you and your hearing aid to further understand how we can support you and improve our customers hearing. The type of data we use profiling for are as follows:

Data regarding your use of the hearing aid (hours per day) will provide our audiologist with an effective tool to monitor your progress and to give you better suited advice, thus improving your hearing experience.

If we find the hearing aid is regularly being used in an environment with lots of background noise, we can use this data to adjust the filter functions on the hearing aid, giving you support in listening to speech in noisy environments.

We will use data such as your historic sales, marketing preferences and behaviour so we can send you marketing information, offers and promotions which is most relevant to you and your hearing needs.

#### 10. Use of 'Cookies'

'Cookies' are small files which are sent by a website to your computer and stored on your hard drive to allow the website to recognise when you visit. They allow the website to remember information such as which country you are visiting the website in but do not identify you as an individual.

You can switch off cookies from the Lisburn Hearing Centre website by visiting our cookies webpage. Turning cookies off may affect the experience you receive on our website.

#### 11. How is your information stored and for how long?

We will only retain your information for as long as is necessary for the purpose(s) for which we have collected it. The criteria that we use to determine retention periods will be determined by the nature of the data and the purposes for which it is kept. We will not directly market to you for longer than 15 years unless you consent to receive direct marketing by opting in before the expiry of that 15-year period. In certain circumstances, once we have deleted or anonymised your data, we may need to retain parts of it (for example, your email address), in order to comply with our obligations under GDPR or other legislation, or for fraud detection purposes.

## 12. Complaints Procedure

Please note that any concerns should be raised in the first instance to the Data Protection Administrator, Lisburn Hearing Centre 2a Smithfield Square, Lisburn Co. Antrim BT28 1TH or [lisburnhearing@btconnect.com](mailto:lisburnhearing@btconnect.com)

Please also be aware that you have the right to raise any concerns regarding data protection with the Information Commissioners Office who are our regulatory body. For the most up to date contact details please refer to their website.

## 13. Date of Privacy Policy

This policy was last updated in June 2018. We review the policy regularly to keep in line with UK and EU legislation.