

Privacy Notice
Hearing Check Limited
August 2023

1. Information on How we use your Personal Data.

This is the Privacy Notice of Hearing Check Limited (registered number 10230610). We take your privacy very seriously so please read through our Privacy Notice. It includes information about:

- a) Why we collect and keep information about you.
- b) What information we collect.
- c) How long we may keep your information.
- d) Who may see your information.
- e) Who we may share your information with.
- f) Your rights concerning your information.

Hearing Check Limited processes personal information (Personal Data) every day. This information is used by Hearing Check Limited and their associates as part of their normal work. We take our duty to protect your personal information very seriously and all processing will be in line with the UK General Data Protection Regulation (UK GDPR) as tailored by the Data Protection Act 2018 and current general UK legislation.

Hearing Check Limited normally processes Personal Data as a Controller where the information relates to our patients, suppliers, employees, contractors, advisers, and professional experts.

Personal Data is any information by which an individual person can be identified. This includes a name, identification number, address, email address, IP address, photo, date of birth, and phone number. It also covers any factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of a person.

We will take all reasonable means to keep your Personal Data confidential whether this is held on the computer, on paper, or other media. Every member of staff working with Hearing Check Limited has a legal duty to keep information about you secure and confidential. This is also included in associates, contractors and partners' terms and conditions.

For any information, please contact our data protection representative:

Name: Gerard Rowbottom
Address: Hearing Check Ltd. 167 Garstang Road, Fulwood, Preston. PR2 3BH (Head Office)
Telephone: 01 772 862 000
Email: ged.rowbottom@hearing-check.co.uk

For independent advice about data protection issues, you can contact:

Name: The Information Commissioner
Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Telephone: 03 031 231 113
Email: casework@ico.org.uk
Website: www.ico.org.uk

2. What Information do we collect?

Hearing Check Limited aims to provide you with the highest quality of service. To do this we must keep records about you, and the services we have provided to you or plan to provide to you.

The Personal Data we hold about you is protected by strict physical, electronic, and other means and includes:

- a) Basic details about patients (and potential patients) and their business such as name, address, telephone number.
- b) Services provided.
- c) Financial details.
- d) Any information necessary for the provision of our services.
- e) CCTV in certain locations.
- f) Videos of Patients.

We will also process similar Personal Data about our suppliers, employees, independent contractors, advisers, and professional experts (jointly called Associates)

We only process your Personal Data in accordance with the current UK General Data Protection Regulation. This will be to provide you with appropriate services or to meet contractual or legal obligations including maintaining our accounts and records or because you have consented to provide us with the information.

Hearing Check Limited and their Associates keep accurate and up-to-date information about the services you receive, and to enable them to provide you with the right advice about potential new services and activities. It also ensures that any concerns you may have about your services can be thoroughly investigated.

If we intend to use the Personal Data for any other purpose, then you will always be asked first unless required to act otherwise by law.

Some data is deemed **Sensitive Data** and we can only process this with your consent. If the consent is not forthcoming or withdrawn, we may not be able to complete the provision of our services with no liability on our part. Sensitive Data includes information about racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data biometric data, sex life or sexual orientation, and medical information.

3. Who we may share your information with

Information will be seen by the Hearing Check Limited and any others involved in delivering your services. There is sometimes a need to share information about you with other third-party providers so that we

can work together to provide you with the best possible service to meet your needs. We will only ever share your information when there is a legitimate need to do so. It may also be necessary to share some information with:

- a) Suppliers.
- b) Third party contractors.
- c) Business associates and other professional advisers.
- d) Financial organisations.
- e) Official bodies.
- f) Service providers including but not limited to Sage, Microsoft 365, and BluePrint Solutions.

We never share personal data with any other organisation for third party marketing purposes.

4. Marketing and Videos

We will ask patients for Google reviews following an appointment. If we wish to post the reviews provided by patients on our social media and website, we will obtain their consent to how we use these and agree the extent to which and how they wish to be identified.

If we wish to use a photo or video of a patient, we will seek the consent of the patient first and ascertain if they would allow their name displayed in full or as initials.

Consent can always be withdrawn. However, the patient must accept that it is not always possible to delete everything already used in printed documents and online.

We may send you marketing materials if you have asked us for information about our services or have purchased our services or goods. You can always ask for such communication to cease.

5. The Legal Basis for the Processing

The legal basis for the processing shall be:

- a) Processing is necessary for the performance of a contract to which the individual is a party or to take steps at the request of the individual before entering a contract.
- b) Processing is necessary to comply with our legal obligations.
- c) Processing is necessary for our legitimate interests or those of a third party except where overridden by the interests of the individual. This includes the interest of our business in managing the business that we balance against your individual rights.
- d) You have given your consent to the processing.
- e) Processing is necessary for the performance of a task carried out in the public interest.
- f) Processing is necessary to protect the vital interests of the data subject or another natural person.

6. Security of Processing

We have implemented and will continue to update technical and organisational measures to ensure Personal Data processed remains secure but absolute security cannot be guaranteed.

7. Transfers

It may sometimes be necessary to transfer Personal Data overseas. When transfers are needed, information may be transferred to countries or territories around the world. Any transfers made will be in full compliance with all aspects of UK GDPR and follow the country-specific legislation.

8. Keeping your information accurate and up to date

We will make sure that the information we hold about you is accurate and up-to date. We may check with you from time to time to make sure we have the right information about you or your next of kin (where appropriate). If the information is not correct, you can ask us to change it.

9. Your Rights

You have the right to be informed about how your Personal Data is used. This document aims to explain how we use your information but if you are unsure or require more information, please ask Hearing Check Limited.

- a) You have the right to have any inaccurate information about you corrected.
- b) You have the right to have information about you deleted or to stop us from using it when we do not need to keep it anymore. This is subject to our legal rights.
- c) You have the right to access your records (see below) using a Subject Access Request.
- d) You have the right to data portability so that you can use your information with an alternative service provider.
- e) You have the right to object to having your data processed for direct marketing purposes.
- f) You have rights concerning automated decision making and profiling.

10. Can I see my records?

You have the right to ask what personal information we hold about you and to request a free copy of the information. This is known as a Subject Access Request (SAR). SARs must be in writing and accompanied by proof of your identity and address. If you want specific information e.g., a particular timeframe, please clarify this.

If someone is requesting information on your behalf, we shall need your written consent and evidence of ID for both of you.

We must provide you with the information you request within 30 days although we will endeavour to do so as soon as possible.

We have the right to charge for unreasonable requests e.g., repeated requests for the same information.

11. How long do we keep your records?

Hearing Check Limited keeps the information about you in paper records and in electronic records. Hearing Check Limited needs to keep this information to provide you with the best possible service.

Certain types of information about you need to be kept for longer than other information. We will not keep information about you longer than is necessary or longer than required by law.

12. Complaints

If you need further information about the information that we keep about you, speak to Gerard Rowbottom or other member of staff. We will try to answer your questions. If you have any complaints, please send them to our data protection representative in the first instance.

If you are not satisfied with the response, you should contact:

The Information Commissioner

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Email: casework@ico.org.uk

Phone: 03 031 231 113

Website: www.ico.org.uk

13. General

You may not transfer any of your rights under this privacy notice to any other person. We may transfer our rights where we reasonably believe your rights will not be affected.

If any court finds that any provision of this privacy notice is invalid illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy notice will not be affected.

Unless otherwise agreed, no delay or omission by a party in exercising any right or remedy will be deemed a waiver of that or any other right or remedy.

The laws of England and Wales will govern this notice.

This notice will be updated from time to time and a copy of the latest version will be on our website.