

Privacy Policy

Clarity Hearing Solutions, part of the Imperial Hearing Group respects your privacy and protecting your information is paramount. Please read this Privacy Policy before using our website or registering to use our services in order to understand our views and practises regarding your personal data and how we will treat it. This Privacy Policy sets out the basis on which any personal data will be processed by us.

Who is responsible for your data

Our Privacy Policy applies to the personal data that Clarity Hearing Solutions collects and uses. References in this Privacy Policy to “Clarity Hearing Solutions”, “Clarity Hearing”, “we”, “us” or “our” mean Clarity Hearing Solutions (a company registered in England and Wales with registration no 06862984 and registered office at 45 High Street, Christchurch, Dorset, BH23 1AS).

We control the ways your personal data is collected and the purposes for which your personal data is used by us as the “data controller” for the purposes of the UK Data Protection Act 1998 and General Data Protection Regulations 2018.

Personal data we collect and hold about you

When using the term “personal data” in our Privacy Policy, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold. Your personal data may include for example your name and contact details.

We need to collect some personal data from you when you request our services.

Categories of data we collect

We may collect and process the following categories of information about you:

Your full name, date of birth and your contact details (email address, telephone number and postal address)	When you request an appointment booking on our website When you call us When you take part in our competitions When you choose an offer we make available on our website When you attend an event put on by us
Details of your audiogram and responses to your initial consultation questionnaire and ear wax removal questionnaire	When you attend an appointment or consultation with a member of the team
Information about your transaction, including your payment card details and relevant forms of Identification	When you purchase or use our products or services
The communications you exchange with us (for example, your emails, letters, calls or	When you contact us or we contact you

your messages on our online chat service)

Your posts and messages on social media directed to Clarity Hearing

When you interact with us on social media

How and why we use your personal data

We may use your personal data for the following purposes.

- **To manage the products and services you hold with us and to comply with law.**
- **To provide our products and services to you** – We will use your information to perform our services in relation to your hearing, for example to book in follow up appointments or to service your hearing aids. This list isn't exhaustive.
- **To communicate with you and manage our relationship with you relating to the product and/or services you have with us** – We may need to contact you by phone, email, post and/or SMS for administrative or operational reasons regarding the products and services you hold with us.
- **To arrange, alter, cancel or postpone an appointment** – We will use the information you provide after you have sent us a request, filled in a web-form through our website or contacted us on social media to provide you with the response to your request.
- **To improve our services, fulfil our administrative purposes and protect our business interests** – The business purposes for which we will use your information include accounting, billing and audit, credit or other payment card verification, fraud screening, safety, security and legal purposes, statistical and marketing analysis, systems testing, maintenance and development.
- **To improve our quality levels, help with staff training and to provide evidence in the event of complaint or dispute** – We may record telephone conversations or other communications between you and us. We will use these recordings or transcripts of them to check your instructions to us, analyse, assess and improve our services to customers, for training and quality purposes and for the purposes of investigating any complaint you may make, or as evidence in any dispute or anticipated disputes between you and us.
- **To inform you about news and offers relating to your hearing and the products and services we provide** - Our contact with you will usually be in the form of a letter, newsletter or phone call, and may include: invites to our events, company news, new products and services, special offers and cost saving promotions. We will also provide you with any useful news relating to developments in hearing aids and technology. This is not an exhaustive list, and is subject to change. Of course, you can change the way you receive information from us at any time by emailing enquiries@clarity-solutions.com

Please note that we do not share your contact details and/or personal data with any other companies for marketing purposes. If you do not want to receive communications from us, you can simply tell us by clicking the relevant box before submitting your details or by emailing us at enquiries@clarity-solutions.com with the subject title 'unsubscribe', at any time. You can also unsubscribe from any email we send you by clicking the unsubscribe link at the bottom of any marketing related email you receive from us. You can also call us on 08000 199575.

How long we will hold your personal data

- **To comply with HMRC legal obligations** – this legal requirement requires us to keep records [including invoices and contracts] for 6 years from the end of the last company financial year they relate to.
- **Existing patients, to provide the products and services you hold with us** – typically hearing aids are replaced or serviced every 5 years. Therefore, we will hold your personal data on our secure systems for this period. We will contact you prior to the end of this period to arrange a review appointment, under legitimate interests.
- **When you attend an appointment with us, but do not purchase a hearing aid** – we will follow up your enquiry by letter, email and occasionally by phone and hold your details on our secure systems for a period of 5 years.
- **Deceased patients** – we will securely shred and remove from our systems any data relating to a deceased individual within 12 months of being notified of the death.

Requesting access to your personal data

You have a right to request access to the personal data that we hold about you. We will provide this information to you within one month of the initial request, free of charge. Any additional copies may be chargeable. If you would like to request a copy of your personal data, please email us at enquiries@clarity-solutions.com The request must be made in writing and contain:

- Your name
- Your postal address
- A telephone number where you can be reached
- A copy of your passport or driving licence
- Signed authority from the individual whose data is required if you are requesting on their behalf

If you have questions in relation to your personal data, please contact us at: enquiries@clarity-solutions.com

Security of your personal data

We are committed to taking appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access, loss or damage.

As described in this Privacy Policy, we may in some instances disclose your personal data to third parties. Where we do this, we require that the third party has appropriate technical and organisational measures in place to protect your personal data. This will never be for marketing purposes, but only for the purposes of administering the products and services you have purchased through Clarity Hearing.

The information that you provide to us will be held in our secure servers, which are located in the Cloud. Your personal data may be accessed by and processed outside the European Economic Area (the European Economic Area being the European Union and Iceland, Liechtenstein and Norway, also referred to as the “EEA”) by staff operating outside the EEA who

are employed by us. Where your personal data is accessed outside of the EEA, we require that appropriate safeguards are in place.

Cookies or other tracking technologies

In order to improve our services, to provide you with more relevant content and to analyse how visitors use our website, we may use technologies, such as cookies, pixels or tracking software. Please be aware that in most cases we will not be able to identify you from the information we collect using these technologies.

For example, we use software to monitor customer traffic patterns and website usage to help us develop the design and layout of the website in order to enhance the experience of the visitors to our website. This software does not enable us to collect any personal data. In addition, in order to understand how our customers interact with the emails and the content that we send, we use pixels that allow us to know if the emails we send are opened or if the content of our emails is displayed in text or html form.

We also use cookies in our website, and in some of our emails. Cookies are small pieces of information stored by your browser on your computer's hard drive. They enable you to navigate on our website and allow us to provide features such as remembering aspects of your last search to make subsequent searches faster. You can delete cookies if you wish; while certain cookies are necessary for viewing and navigating on our website, most of the features will be still accessible without cookies.

Sharing your personal data

We may share some of your personal data with, or obtain your personal data from, the following categories of third parties:

- **Suppliers providing services to us in order to help us run our business and improve our services.** This could be a hearing aid manufacturer that we partner with or a data processing unit to cleanse our data.
- **Purchased data** – from time to time we purchase data from data centres in order to market our products and services. We do not share our customer data.
- **Credit and debit card companies.** We may share some of your personal data, which includes information about your method of payment, to the credit or debit Card Company that issued the card you used to pay for your products or services. In order to ensure the security of your transactions and prevent or detect fraudulent transactions, we may also share your information with fraud screening partners.
- **Fraud prevention agencies.** To prevent crime and trace those responsible.
- Your personal data may be disclosed to a third party who acquires us, or substantially all of our assets or if we sell or buy any business or assets.
- We are under a duty to disclose or share your personal data in order to comply with any legal obligation; or to protect the rights, property, or safety of Clarity Hearing, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Updates to our Privacy Policy

We may make changes to this Privacy Policy from time to time, including as part of the new European data protection legislation which will start to apply on 25 May 2018 (the "General

Data Protection Regulation”) – we will update the Privacy Policy and we will publish on our website any new version of this Policy.

Contact information

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to enquiries@clarity-solutions.com

<https://www.clarity-solutions.com/>

01202 478881