

THE ART OF HEARING: PRIVACY POLICY

This is the Privacy policy of The Art of Hearing Ltd and its website: www.theartofhearing.co.uk

The Art of Hearing is committed to safeguarding and respecting your (our client) privacy and your personal data.

What is a Privacy Policy?

A Privacy Policy is an agreement where organisations are required to specify what personal data they collect. This Privacy Policy outlines how The Art of Hearing collects and uses data:

1. When you visit our website and use the Contact Form or Online Hearing Screening
2. Directly from you when you attend our clinic for any services
3. For information on how The Art of Hearing uses website cookies, please see our *Website Cookie and Privacy Policy*

Why do we need a Privacy Policy?

Privacy Policy agreements are a legal requirement for all organisations that collect data either via the website or directly from you when you visit the clinic to receive services. As of 25 May 2018, a new European (EU) Law called GDPR was implemented.

What is GDPR

GDPR stands for General Data Protection Regulation 2016/679. This is a regulation in EU law on data protection and privacy for all individual citizens of the European Union and the European Economic Area. This law helps us keep information about you, our client, safe.

As noted above, The Art of Hearing collects and uses data when you submit information on the website and directly from you when you attend appointments at the clinic. While we are committed to safeguarding your privacy, GDPR helps us check we are doing this effectively.

To comply with the GDPR The Art of Hearing:

- Has a GDPR compliant Privacy Policy
- Abides by the principles of the GDPR
- Only processes your personal data in the lawful way

The GDPR covers the 'processing' of 'personal data.'

- *Personal data*: is information that can be used "*directly or indirectly*" to identify a person
- *Processing*: is any sort of data processing activity or filing (electronic or otherwise). This might include the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data. Examples of processing data include:
 - Asking you to fill out a contact form on our website
 - Having access to your contact details such as telephone, email and address
 - Having access to information you provide in order for us to provide a service when you visit the clinic
 - Sending direct marketing or information-based emails

The legal requirement for processing our client's data

A key requirement of GDPR is that we have a specific purpose and legal basis for processing your personal data and that we are transparent about this. The Art of Hearing collects data to fulfil contracts and for other purposes as outlined in section 'What information is collected by The Art of Hearing':

- **A Contract:** Where the data is collected for the purpose of fulfilling a contract with you, we will use your personal data on the basis that processing is necessary to fulfil that contract
- **Other purposes:** Where the data is collected for other purposes (outlined in section 'What information is collected by The Art of Hearing' below), we will process your personal data on the basis that you have given consent either online via our website or during your registration when visiting The Art of Hearing Clinic

What information is collected by The Art of Hearing?

The Art of Hearing does not obtain any personal data from third parties.

The Art of Hearing website (www.theartofhearing.co.uk) collects the following data:

- **Automatically when you consent to allowing cookies:** computer IP address, operating system, browser type and your HTTP request
- **When you voluntarily provide information on the contact form:** your name, your email, your telephone number
- **When you voluntarily provide information on our online hearing test form:** date of birth, gender, hearing screening results

The Art of Hearing collects the following data about you when you register or visit the clinic for service/s:

- **Information you give us:** This is information is provided by you when filling in forms at our clinic, or by corresponding with us by phone, e-mail or otherwise. The information you give us may include your title, name, address, e-mail address phone number, date of birth, occupation, next of kin or parents and GP
- **Information we collect about you:** This is information that we collect during a clinical appointment. This includes personal information about your hearing and ear health, ear and hearing history, your use of hearing aids or other assistive listening technologies, your general well-being, balance, dexterity, vision, mental health, medical conditions and psychosocial information
- **Information about your care:** This information includes the details shown above as well as notes of appointments, treatment information, audiology and hearing assessment test results, as well as other physical health data if relevant to your condition or treatment
- **Payment details:** We may use information such as bank details, credit or debit card payment details etc. for the payment of goods and services and/or to deliver or fulfil a contract with you. **We guarantee that your personal information will not be disclosed to any third party**

Why do we collect this data?

Data collected from the website (www.theartofhearing.co.uk)

- **Website cookies:** We will only use data from the website (collected automatically or provided by you voluntarily) for purposes stated in our *Website Cookie and Privacy Policy*
- **Information provided on the website contact form:** information submitted on the contact form will only be collected for the purpose of responding to your request and shall not be kept for longer than is necessary for that purpose. By ticking the box which states "Please tick to opt in to receive our news letter containing information about hearing and hearing health care. Your email will not be shared with any third parties" on our website contact form, you have consented to receive marketing emails which contain information about hearing and ear care from The Art of Hearing. **We guarantee that your personal information will not be disclosed to any third party**

- **Information provided on the online hearing test form:** Your gender and date of birth is used to compare your hearing test results with normative data. The Art of Hearing will not store this data unless voluntarily provided by you when you visit our clinic. **We guarantee that your personal information will not be disclosed to any third party**

Data collected from our clients who visit the clinic to receive a service

- Information you give to us and which we collect from you as a client will be used only when given consent to do so, for the following purposes:
 - To provide information, products and services that you request from us
 - To provide you with information about other services and products that we offer that are similar to those that you have enquired about or which we reasonably consider may be of interest to you; and
 - To notify you about changes to our services.

Personal data collected about your care

- This data as listed above in section 'What information is collected by The Art of Hearing' is essential to provide you with high quality ear and hearing care services.
- The personal data provided by you will be held under a healthcare duty of confidentiality. This means that data collected from you will only be used to provide direct personalised ear and hearing care services.

We will only collect personal data with your (or a legal guardian's) full consent. You may wish to withdraw this consent at any time – this may mean that the services provided by The Art of Hearing could be terminated as without this information we may not be able to provide high quality ear and hearing care services.

How do we use your personal information?

Sharing of information

- The Art of Hearing are committed to safeguarding and respecting your privacy and your personal data. We will not share your personal information with any other party, unless specifically requested or agreed by you
- We will not share your data with any other organisation or individual for third parties for marketing purposes
- If required to by law, we may disclose your data to law enforcement authorities or to enforce our legal rights
- There may be circumstances in which we will share your personal data with other healthcare professionals to assist with your treatment, or with manufacturers in order for them to deliver products which you have ordered

Medical information

- We may share medical information if during a consultation, a condition is highlighted that requires you to consult with another medical professional
- We will always inform you of the need to do this and your data will be shared and handled securely at all times

Contact information

- We may use your email, postal address or telephone number to communicate with you specifically in relation to matters relating to you as a client
- We may also send you correspondence by email, text or by post containing appointment reminders, marketing information about relevant services offered by The Art of Hearing

We reserve the right to process your personal data for our legitimate interests of obtaining legal or other professional advice or transferring our business assets (including personal data) on reorganisation, sale or merger of any part of our business.

Who looks at my personal information?

A person called a **Data Controller** decides how and why personal data is processed. If you have any concerns or questions about our use of your personal data, contact the Data Controller (owner of the Art of Hearing): Ms Aarti Makan aarti@theartofhearing.co.uk

Who uses my personal information?

A person called a **Data Processor** uses your information. If you have any concerns or questions about our use of your personal data, contact the Data Processor (owner of the Art of Hearing): Ms Aarti Makan aarti@theartofhearing.co.uk

Who protects my personal information?

A person called a **Data Protection Officer** is responsible for overseeing what we do with your information and monitoring our compliance with data protection laws. If you have any concerns or questions about our use of your personal data, contact the Data Protection Officer (owner of the Art of Hearing): Ms Aarti Makan aarti@theartofhearing.co.uk

Where is my information stored?

Cookies and website data

- see *The Art of Hearing Website Cookie and Privacy Policy*

Personal and medical data

- The Art of Hearing uses a patient management system called Strato to store your data. This software is owned by a company called Auditdata. Auditdata are ISO 27001 certified so are in an ideal place to meet the demands of GDPR. For more information see <http://stratoblog.auditdata.com/strato-and-gdpr-compliance/> and <https://www.auditdata.com/privacy/>

How long do we keep your data for?

Cookies and website data

- see *The Art of Hearing Website Cookie and Privacy Policy*

Personal and medical data

- We will keep your personal data throughout the time that you are a patient with us or until such time as you notify us that you no longer require services or products and no longer wish to receive this information
- At times we may be required to keep your data for a further period, dependent on the type of treatment or services you receive from us and in accordance with all applicable UK laws (for example, HMRC dictate that financial details relating to payment for treatments or services must be kept for 6 years)
- The Medicines and Healthcare products Regulatory Agency (MHRA) are responsible for ensuring that medicines and medical devices work and are acceptably safe. These medical device Regulations make it a legal requirement to be able to trace individual patients if necessary. To comply with this, if you have been issued a medical device (hearing device or assistive listening device) we will retain personal data for twenty years after the last contact date with you if relevant, or until a request is made to delete it, whichever is the sooner
- Personal data will be deleted or securely destroyed at the end of its retention period

Your rights

The Art of Hearing is committed to safeguarding and respecting your privacy and your personal data. We will always only use your data to help provide you with relevant information, services or treatments.

- **Marketing:** You have the right to object to our use of your personal data for marketing purposes
- **Access to your information:** You have a right to request access to your information. Generally, we will provide this information free of charge, however in certain circumstances we reserve the right to charge a reasonable fee to meet our costs in providing you with details of the information we hold about you
- **Revise information:** You have the right to have any incorrect information corrected
- **Withdrawing consent:** You have the right to withdraw your consent to our processing for specified purposes or at all at any time. **This may mean that the services provided by The Art of Hearing could be terminated**
- **Restrict use of your data:** Request that your personal information is stored and processed for specific purposes only
- **Data erasure:** you have the right to request that your data is removed from our databased at any time. **This may mean that the services provided by The Art of Hearing could be terminated as without this information we may not be able to provide high quality ear and hearing care services.**
- **Right to lodge a complaint:** While we will endeavour to only use personal data that is relevant to our purpose and ensure your personal data is kept secure, sometimes errors occur. If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Officer who will investigate the matter. If you are not satisfied with our response or believe we are not processing your personal data as required by law you can contact the UK Information Commissioner's Office (<https://ico.org.uk/>) or the supervisory authority in your country of residence or place of work.

You can exercise any of your rights by contacting us at our **Registered address:** 1st Floor, 89 High Street, Newport, Pagnell, MK14 8AB or **via email:** aarti@theartofhearing.co.uk

Privacy Policy changes

Any changes we make to our privacy policy in the future will be posted on our website, and where practicable, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

Data protection contacts

We welcome any questions, comments and requests regarding this privacy policy. Please do so by writing to our Data Controller (owner of the Art of Hearing Ltd) at our **Registered address:** 1st Floor, 89 High Street, Newport, Pagnell, MK14 8AB or **via email:** aarti@theartofhearing.co.uk