## Privacy Notice for Hidden Hearing Ltd.'s processing of personal data on social media platforms

## 1. INTRODUCTION

At Hidden Hearing Ltd we respect and protect the privacy of our users, and we are dedicated to being as transparent as possible regarding the use of your personal data.

This privacy notice ("**Privacy Notice**") explains how Hidden Hearing Ltd processes your personal data in connection with your interaction with Hidden Hearing Ltd as a data controller by use of different social media platforms, such as Facebook, Instagram, Twitter, YouTube and LinkedIn.

In this Privacy Notice, "we", "us" and "our" mean Hidden Hearing Ltd.

We may change this Privacy Notice from time to time, so please check back when you use our services to make sure that you have seen the most recent version.

## 2. WHO WE ARE

If you have any questions about this Privacy Notice, or you would like to exercise your rights, you can contact us by using the contact points below.

Hidden Hearing Ltd Meadow House Medway Street Maidstone Kent ME14 1HL

Tel: 0800 0378 989

Email: privacy@demant.com

# 3. PERSONAL DATA WE COLLECT AND USE

We may process the following types of personal data:

- Information about you, such as your name, email, age, gender, country, job title, current and former
  employer, education background, profile picture, interests, your friend list/connections/followers
  etc., and other publicly available information, provided that you have published all this information
  on your social media profile or posted it on one of Hidden Hearing Ltd social media pages.
- Other information you provide to us by posting on Hidden Hearing Ltd social media page, including
  your comments and/or likes to our posts and pictures or direct messages you send to us via Hidden
  Hearing Ltd social media platforms.

In addition to the above, the different social media platforms collect personal data concerning you through your use of these social media platforms and through the use of cookies and similar technologies, including cookies collected via the social media tools, such as Facebook Insights, Facebook Pixel, Facebook Custom Audience, Facebook Lookalike Audience, Twitter Pixel, LinkedIn Insight Tag and LinkedIn sponsored InMail etc.

In some cases, for instance, in relation to our Facebook page, Hidden Hearing Ltd acts as joint controller together with Facebook in relation to the processing of your personal data. Thus, we recommend that you read Facebook's privacy notice to understand how Facebook processes your personal data.

We generally refer to the different social media platforms' privacy notices for more information about their processing of your personal data. Below you will find a listing of the social media platforms that Hidden Hearing Ltd uses and a reference to their privacy notices.

- Link to Facebook's data policy https://www.facebook.com/policy.php
- Link to LinkedIn's privacy notice: https://www.linkedin.com/legal/privacy-policy
- Link to Instagram's privacy policy: https://help.instagram.com/402411646841720
- Link to Twitter's privacy policy: https://twitter.com/en/privacy
- Link to YouTube's privacy policy provided by Google: https://policies.google.com/privacy?hl=en-US

# 4. WHY DO WE COLLECT AND USE YOUR PERSONAL DATA AND WHAT IS OUR LEGAL BASIS FOR DOING SO

We use your personal data for the following purposes:

- To understand the audience to our social media channels by getting to know the demographic, preferences and interests which enables us to provide relevant information.
- To analyse trends and profiles to enhance, modify, personalise and improve our services and communications for the benefit of our audience.
- To process and respond to requests and enquiries received from you.
- To carry out market surveys to enhance, modify, personalise and improve our services and communications for the benefit of our users through Hidden Hearing Ltd social media pages on Facebook, Instagram, Twitter and YouTube.
- To recommend products and services we think you will be interested in. We do to carry out direct
  marketing to our customers and/or potential customers. However, if we use electronic methods,
  such as email or direct messaging through our social media pages, for instance, via Facebook and/or
  Instagram, to send direct marketing to you, we will only do so if it is permitted under the applicable
  rules on direct marketing.

The legal basis for collecting and processing your personal data via Hidden Hearing Ltd different social media pages is our legitimate interest as described above in accordance with EU General Data Protection Regulation ("GDPR") art. 6(1)(f). Our legitimate interests are under these circumstances regarded to override your interests.

## 5. HOW WE SHARE YOUR PERSONAL DATA

We will not pass, sell or otherwise share or disclose your personal data, except as described herein or otherwise stated at the time the personal data is collected.

As mentioned under section 3, we may act as joint data controller in relation to the processing of your personal data via our social media pages together with the specific provider of the social media, for instance, Facebook Inc. or Facebook Ireland Ltd. This means that we are jointly responsibly for processing of your personal data. We have inserted a reference to Facebook's privacy notice in section 3.

We may share your personal data with affiliated companies within the Demant Group in order to deliver, enhance and develop our products and services. Please refer to the organisational chart in our latest annual report to see which companies form part of the Demant Group. You can find our latest annual report at www.demant.com.

We may share your personal data with our service providers for a variety of tasks, such as:

- assisting us with administering or troubleshooting our website;
- assisting us with the supply or design of our products or with our business administration;
- assisting us with our marketing campaigns, for instance, via Facebook Custom Audiences and Facebook Lookalikes;
- providing us with electronic or physical storage services or systems.

We will only share your information under these circumstances, if it is necessary for our service providers to perform the specific service for us. These service providers are not authorised to keep or use your personal data for any other purposes, and they will always be under an obligation to keep your personal data safe and confidential.

We may disclose your personal data 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.

#### 6. TRANSFER OF DATA TO THIRD COUNTRIES

In order to deliver our products and services to you, we may share your personal data with affiliated companies in the Demant Group located outside the EU/EEA and non-affiliated companies, such as service providers or business partners located outside the EU/EEA provided this is considered necessary in relation to a particular data processing activity or performance of the service.

If your personal data are transferred outside the EU/EEA, we will implement appropriate technical and organisational measures in such a manner that processing will meet the requirements of the relevant data protection laws including ensuring the protection of the rights of the data subject. Where necessary, we have entered into the EU Commission's standard contractual clauses with the recipient of the personal data. The EU Commission finds these clauses to provide adequate guarantees for the protection of privacy, basic rights and liberties, as well as for exercising the associated rights.

## 7. HOW LONG DO WE KEEP YOUR PERSONAL DATA

We will keep your personal data for as long as necessary for legitimate legal or business reasons, including to comply with any regulatory obligations.

We will delete your personal data, when it is no longer required in relation to the purpose for our collection, processing and storage of your personal data. We will also store personal data that we are obliged to keep in accordance with the law.

If you have commented on any of our posts on social media platforms, such comments will be deleted at the time when the post in question is deleted. We may, however, choose to delete specific comments at an earlier point in time. You may also at any time choose to delete your own comment.

Information that is collected via social media platforms for a specific purpose, for instance, a targeted marketing campaign, will be deleted 1 year after the specific processing activity is carried out. Certain data may be retained up to 2 years after the specific campaign for documentation purposes.

If you would like more detailed information about our retention policy, please contact us by using the contact points in section 2 above.

## 8. YOUR PRIVACY RIGHTS

Pursuant to the GDPR, as a result of our processing of your personal data, you may exercise a number of rights. They are:

- The right to access to your personal data
- The right to have us rectify (correct) your personal data
- The right to have us delete your personal data
- The right to restrict our processing of your personal data
- The right to data portability
- The right to object to our processing

These rights may, however, be subject to conditions and/or exemptions, e.g. to ensure other people's privacy, trade secrets, intellectual property rights or to comply with a legal obligation.

If you would like to exercise one or more of your rights, please contact us by using the contact points in section 2 above.

## 9. RIGHT TO LODGE A COMPLAINT

If you have a concern in relation to how we use your data, please let us know, and we will reply to your queries and, if necessary, take steps to ensure our practices are consistent with our obligations. If you are still not satisfied with the way we use your data, you have the right to lodge a complaint with the relevant national data protection authority. In the United Kingdom the relevant data protection authority is the Information Commissioner's Office (ICO). You can contact them through it's website: https://ico.org.uk/global/contact-us/. You can also call the ICO helpline from the UK on 0303 123

#### 10. CHILDREN'S PRIVACY

On occasion we may provide solutions for children but our social media pages on Facebook, Instagram, Twitter, YouTube and LinkedIn are not intended or designed to collect personal data about children under the age of 16. We do not intentionally collect personal data from any person we know to be under the age of 16.

# 11. THIRD PATY LINKS

Hidden Hearing Ltd social media pages on Facebook, Instagram, Twitter, YouTube and/or LinkedIn may contain links to websites of other companies and organisations. This Privacy Notice does not apply to such third-party sites, and we suggest that you contact those third-party sites directly for information on their data collection and distribution policies.

## 12. CHANGES TO THE PRIVACY NOTICE

We may update this Privacy Notice from time to time by publishing a new version on our website www.hiddenhearing.co.uk and and different social media pages on Facebook, Instagram, Twitter, YouTube and/or LinkedIn.