

SONOVA respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when using our services and tell you about your privacy rights and how the law protects you.

## Important information and who we are

### Purpose of this privacy policy

This privacy policy aims to give you information on how SONOVA collects and processes your personal data through your use of this service including any data you may provide through this service.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy so that you are fully aware of how and why we are using your data.

### Controller

Processor is Sonova AG, Laubisrütistrasse 28, 8712 Stäfa, Switzerland, +41 58 928 01 01, [privacy@sonova.com](mailto:privacy@sonova.com)

Controller is Nolke Opticians & Hearing Care  
Uluru Centre, Dunmore Rd,  
Waterford, County Waterford  
051 855638  
[hearing@nolkeopticians.com](mailto:hearing@nolkeopticians.com)

### Contact details

If you have any questions about this privacy policy or our privacy practices, please contact us at [privacy@sonova.com](mailto:privacy@sonova.com)

### Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name and last name.
- **Contact Data** includes email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, operating system and platform.
- **Usage Data** includes information about how you use our services.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

# How is your personal data collected?

We use different methods to collect data from and about you:

- **Direct interactions.** You may give us your identity and contact information by filling in forms. This includes personal data you provide when you:
  - request hearing report to be sent to you;
  - request to be called back or contacted by a hearing care professional.
- **Automated technologies or interactions.** As you interact with our service, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies [server logs] and other similar technologies. Please see our cookie policy <https://www.sonova.com/en/cookie-policy> for further details.
- **Third parties or publicly available sources.** We will receive data from Google Analytics. (we gather information to analyze user actions in the app and to improve the product. All data are anonymized)

## How we use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data
To register you as a new customer	<ul style="list-style-type: none"><li>▪ Identity</li><li>▪ Contact</li></ul>
To manage our relationship with you which will include: <ul style="list-style-type: none"><li>▪ Notifying you about changes to our terms or privacy policy</li><li>▪ Asking you to leave a review or take a survey</li></ul>	<ul style="list-style-type: none"><li>▪ Identity</li><li>▪ Contact</li><li>▪ Profile</li><li>▪ Marketing and Communications</li></ul>
To enable you to partake in a prize draw, competition or complete a survey	<ul style="list-style-type: none"><li>▪ Identity</li><li>▪ Contact</li><li>▪ Profile</li><li>▪ Usage</li><li>▪ Marketing and Communications</li></ul>
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"><li>▪ Identity</li><li>▪ Contact</li><li>▪ Technical</li></ul>
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none"><li>▪ Identity</li><li>▪ Contact</li><li>▪ Profile</li><li>▪ Usage</li><li>▪ Marketing and Communications</li><li>▪ Technical</li></ul>
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"><li>▪ Technical</li><li>▪ Usage</li></ul>

To make suggestions and recommendations to you about goods or services that may be of interest to you

- Identity
- Contact
- Technical
- Usage
- Profile
- Marketing and Communications

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://www.sonova.com/en/cookie-policy>.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

## **Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in the table above.

- External Third Parties that will have access to your Personal Information only to perform tasks on our behalf and are obligated not to disclose or use it for any other purpose.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **International transfers**

Whenever we transfer your personal data out of the European Economic Area, we ensure a similar degree of protection is afforded to it than within the European Economic Area.

## **Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **Data retention**

### **For how long will you use my personal data?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes

we collected it for. In some circumstances we will anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. In summary these rights are:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data.

If you wish to exercise any of the rights set out above, please contact us at [privacy@sonova.com](mailto:privacy@sonova.com)

### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## Your legal rights

You have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - If you want us to establish the data’s accuracy.
  - Where our use of the data is unlawful but you do not want us to erase it.
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third

party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.