



hearing products for a better life style

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PRIVACY POLICY

Sarabec Limited ("we", "us" or "our") are committed to protecting and respecting your privacy.

Our Privacy Policy sets out our policy in relation to the collection, storage and use of personal data throughout the company's activities.

This Policy is to be read in conjunction with the following

- ✓ Website Acceptable Use Policy. Sets out terms on which visitors are permitted to use the features of our website
- ✓ Cookie Policy. Provides the necessary information about our website's use of cookies.
- ✓ Website Terms of Use. Sets out the terms of access and use of our websites.

This policy explains the way we use your personal data and sets out specifically:

- ✓ What personal data we collect and how we collect it.
- ✓ How and why we use your personal data.
- ✓ Our legal basis for using your personal data.
- ✓ Obligations on you to provide us with personal data.
- ✓ When your personal data will be shared.
- ✓ Where we use your personal data.
- ✓ How long we store your personal data for.
- ✓ Your rights in relation to our use of your personal data.
- ✓ Changes to this policy.
- ✓ How to make a complaint.
- ✓ How to contact us.

Please read this policy carefully to understand our practices regarding your personal data and how we will treat it.

What personal data we may collect and how we collect it.

- ✓ Information you give us. You may give us information about yourself by filling in forms on our site or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our website, search for a product, place an order on our site, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey or when you report a problem with our site. The information you give us will include, but is not limited to, your name, postal address, e-mail address and phone number and payment information (debit, credit card or cheque details).
- ✓ Information we may directly collect about you. With regard to each of your visits to our websites we may collect the following information:

- technical information, including the IP address used to connect your computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
 - information about your visit, including when and how you accessed our site
 - products you viewed or searched for
 - page response times
 - download errors
 - length of visits to certain pages including page interaction information
 - methods used to browse away from the page
 - any phone number clicked on to call our customer service number
- ✓ Information we may receive about you from other sources. We will receive information about you if you use any of the websites we operate, the other services we provide and/or any of our social media pages. We are also work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers) and may receive information about you from them.

How and why we use your personal data

We use personal data held about you in the following ways and for the following purposes:

Contractual and sales purposes

- ✓ we need to use your personal data for administrative purposes, in respect of our relationship with you as a customer or supplier;
- ✓ we need to use your personal data to enable us to carry out our obligations arising from any contracts entered into between you and us; and
- ✓ we need to use your personal data to notify you about changes to our service.

Marketing purposes

- ✓ we need to use your personal data for direct marketing purposes, so that we can communicate to you information about goods and services, that are similar to those you have already purchased or enquired about or which we feel may interest you;
- ✓ we need to use your personal data so that we can measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;

Website purposes

- ✓ we need to use your personal data to personalise your experience of our site as a user, so that the content from our site is presented in the most effective manner for you and for your computer and so that you can participate in interactive features of our site when you choose to do so;
- ✓ we need to use your personal data to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; and
- ✓ we need to use your personal data to facilitate our efforts to keep our site safe and secure.

Our legal basis for using your personal data

So that we can process your personal data for the purposes set out above, we rely on the following legal bases:

Legitimate interest. The legal basis we rely on to use your personal data is that it is necessary for the purpose of our legitimate interests. Our legitimate interest for using your personal data is so that we are able to:

- fulfil our obligations to you as a customer or supplier;
- provide you with information about goods and services that we feel may interest you;
- provide you with a personalised and functional experience both online and offline; and
- operate our administration services effectively.

Our legitimate interest is therefore our commercial interest. However, our legitimate interest is also in your interest as our use of your personal data allows us to provide a more effective and efficient service to our customers and suppliers. We use your personal data in a way that has a minimal impact on your rights and only in ways that you would reasonably expect considering the nature of our goods and services.

Contracts. We also use your personal data where it is necessary for the performance of a contract between us and you as a customer or supplier. This is a separate legal basis which applies when you buy something from us or where we buy something from you.

Consent. We may in some circumstances ask for your consent to use your personal data. If we do so, we will make it clear that we are asking for your consent, as this is the legal basis we intend to rely on for using your personal data in that instance.

We will ensure that you know why we are asking for your consent and how we will use your personal data so that you can make an informed decision as to whether to consent to us processing your personal data.

We will only ask for your consent where absolutely necessary. If you do not provide us with your consent when we request it, we will not use your personal data for the purpose to which the requested consent relates, and we will not rely on any other legal basis to do so.

For example, if we ask for your consent so that we can communicate marketing materials to you, and you do not provide us with your consent, or if you later withdraw your consent, we will not rely on our legitimate interest to use your personal data in this way.

When we ask for your consent, we will do so by:

- asking you to tick a tick-box on our website;
- asking you to sign your name on a form;
- verbally over the telephone;
- asking you to click a website address link;
- asking you to respond to an email.

When you provide us with your consent, we will keep a record of this.

However, should you wish to withdraw your consent, you have the right to do this at any time and you should do this by using the contact information set out below.

You must be over the age of 16 to provide us with your consent. If you are 16 or under, your parental guardian must authorise your consent first and complete our online and offline forms to show this where necessary.

Obligations on you to provide us with your personal data

There is no statutory obligation on you to provide us with your personal data. However, you may be required to provide your personal data when entering into a contract with us. Without this personal

data, we may not be able to carry out our obligations arising from any contracts entered into between you and us

When your personal data will be shared

We will not share your Personal Information with third parties unless we have your explicit consent, need to share this information to enable us to fulfil our contract with you, are required by law or where otherwise necessary for our internal business processes.

We may also need to provide your Personal Information to SagePay or other payment processors where you purchase products from us. If you pay by card, your card details will be shared with these payment companies as necessary to process your transaction. These third parties may contact card issuers for validation checks and authorisation on all card payments. By ordering from our website, you acknowledge that such checks shall be made. These measures are taken as extra protection for you, to ensure your online shopping experience with us is as safe and secure as possible.

We also share your Personal Information to third parties for purposes of delivery of the products to you and for the purpose of processing your order.

We may share your personal data with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries. These are companies that are legally connected to us, because of the way in which they are owned.

We may share your personal data with selected third parties including:

- ✓ business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- ✓ advertisers and advertising networks that require the personal data to select and serve relevant adverts to you and others;
- ✓ analytics and search engine providers that assist us in the improvement and optimisation of our site; and

We may disclose your personal data to third parties:

- ✓ in the event that we sell or buy any business or assets, in which case we may provide your personal data to the prospective seller or buyer of such business or assets;
- ✓ Sarabec Limited or substantially all of its property is bought by a third party, in which case personal data held by it about its customers will be part of the transferred property; and
- ✓ if we are under a duty to provide or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of supply and other agreements; or to protect our rights, property, or safety, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Where we use your personal data

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (**EEA**). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers.

Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services.

We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this privacy policy as a safeguard to protect your personal data. If you wish to obtain further information about how these safeguards are implemented in practice, please contact us using the contact information set out below.

How long we will store your personal data

We will continue to store your personal data where it is necessary to do so for the contractual and sales, marketing and website purposes set out elsewhere in this policy. Financial details will be deleted as soon as they have been used to complete a transaction where processed by us.

When it is no longer necessary to store your personal data for these purposes it shall be deleted.

However, even when it is no longer necessary for us to store your personal data for these purposes, we may continue to store your personal data where:

- ✓ you request that we retain your personal data for longer;
- ✓ it is necessary to do so to comply with our statutory obligations arising from areas of law such as trade law, tax law, employment law and administrative law or arising from other industry regulations that we must comply with; or
- ✓ we use your personal data for statistical purposes and where we decide that after carrying out our internal reviews that we have suitable security measures in place to protect your personal data rights.

In contrast, even though it may continue to be necessary for us to store your data for the purposes set out at section 2, we may delete your personal data early if:

- ✓ after carrying out our internal reviews we feel that the risk to your personal data rights outweighs the security measures that we are able to implement;
- ✓ after carrying out our internal reviews we believe that your personal data may be out of date or inaccurate and we are unable to verify this with you; or
- ✓ we are required to do so under your 'right to be forgotten' set out at clause 8.

We will review our basis for storing your personal data regularly to help ensure that your personal data is not stored for longer than is necessary.

Your rights

You have a number of legal rights in relation to your personal data. If you wish to exercise any of your rights in relation to the way we use your personal data, or require any further information, please contact us using the contact information set out below.

We will aim to respond to your request to exercise any of your rights as set out below and contact you directly within one month from the date of your request. If we are unable to deal with your request within this time, we will contact you directly with the reasons for the delay, and details of an extension to our one-month response time.

We will only refuse a request made by you to exercise one of your rights if:

- ✓ we are required to do so by law;
- ✓ we cannot verify your identity;
- ✓ you already have the information that you have requested from us; or
- ✓ we consider your request to be excessive.

Right of access. You have the right to ask us whether we use personal data relating to you. If we do hold any of your personal data, you have a right to a copy of this free of charge. If you require any

further copies of the same personal data, we reserve the right to charge a reasonable fee based on administrative costs.

If you require the personal data we hold about you, please make your request in writing addressed to the contact details set out below and include in your request whether you have a preference of receiving a physical or digital copy. Please specify the information that you require in as much detail as you can, so that we can deal with your request as efficiently as possible.

Right to object. You have the right to object to the way we use your personal data, in certain circumstances, for the reason that you object to the legal basis we rely on to use your data. If you object to our use of your personal data, please contact us using the contact information set out below so that we can consider your request. As part of your request, please include details of the types of information you object to us using, and why you object to the way in which we use it.

Right to object to profiling. You have a right to object to us making a decision on the basis of your personal data by using computer programmes that make decisions automatically, where such a decision would significantly affect you. We do not use your personal data in this way.

Right to object to direct marketing. You have a further right to object to our use of your personal data for direct marketing purposes. If you object to our use of your personal data for direct marketing, please contact us using the contact information set out below so that we can process your request. As part of your request, please include details of the types of information you object to use using, and why.

Right of correction. You have the right to ensure that the personal data we hold about you is accurate and up to date. If you believe your personal data may no longer be accurate or up to date, please contact us using the contact information set out below so that we can consider your request. Until we can verify that your personal data is correct, we will stop using it from the time of your request. As part of your request, please include details of the types of information you would like us to correct, and why.

Right to be forgotten. You have the right to have the personal data we hold about you to be permanently deleted in certain circumstances. Should you wish to have your personal data erased, please contact us using the contact information set out below so that we can consider your request. As part of your request, please include details on the types of information you would like us to delete, and why.

Right to restrict. You have the right to restrict the way in which we use your personal data in certain circumstances. This means that we would only be able to use your personal data for carrying out certain actions. If you wish to only have your personal data used in a certain way, please contact us using the contact information set out below so that we can consider your request. As part of your request, please include details of the types of information you would like use only in certain ways and why.

Right to portability. You have the right to have us transfer your personal data, where it is technically feasible, directly to another organisation who you wish to deal with your personal data. This is so that you do not have to input your personal data on numerous occasions. You also have the right to receive your personal data in a commonly used, electronic format so that you can transfer your personal data to another organisation indirectly.

If you wish to make a portability request, please contact us using the contact information set out below so that we can consider your request. As part of your request, please include details of the types of information you would like us to transfer, who you would like your personal data transferring to, why you would like your personal data transferring and whether you would like us to transfer your personal data to the elected organisation directly, or to you, so that you can do this indirectly.

Please note that your exercise of this right would not require us to delete your personal data, and that we will respond to your requests for free unless we consider your request to be excessive.

Changes to this policy

Any changes we may make to this policy in the future will be posted on our web site and, if appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

How to make a complaint

Should you have any complaint about the way we use your personal data, please contact us using the contact information set out below.

Upon receiving your complaint, we will deal with this in accordance with our internal procedures relating to privacy. If you wish to make a complaint, please set this out separately to any request you may also be making in respect of rights relating to your personal data.

Should you feel that we have not dealt with your complaint to the standards which you expect, you have right to make a complaint to the Information Commissioner's Office (ICO), the government's supervisory authority for matters relating to data protection. The ICO can be contacted on their helpline: 0303 123 1113. For further information on the ICO, please visit <https://ico.org.uk>.

How to contact us

For the purposes of data protection law, we are a data controller in respect of your personal data. Should you have any queries about your personal data or any questions about this policy, please contact us by using the following details:

Sarabec Limited,
15 High Force Road,
Middlesbrough, TS2 1RH
United Kingdom

Telephone: 01642 247789
Fax: 01642 230827

Email: mail@sarabec.co.uk
www.sarabec.com
www.accesstosound.com

This policy is fully supported by senior management.

The responsibility for this policy and its implementation is with the Managing Director.

Signed:



C J Foxtan
Managing Director
For and on behalf of Sarabec Ltd
Privacy Policy Issue 2.2 June 2018