

## Privacy Notice

# Oticon RemoteCare

This document was last updated on the 2<sup>nd</sup> of June 2021.

This privacy notice explains how we collect and use your personal data when you use the Oticon RemoteCare app.

The Oticon RemoteCare app ('the App') is an application designed for remote communication between you and your hearing care professional. The application allows you to have online follow-up appointments with your hearing care professional and to get your hearing aid settings adjusted from the comfort of your own home.

### WHO WE ARE

Oticon A/S acts as data controller and is responsible for the collection and use of your personal data in the App as described in this privacy notice.

If you have any requests or questions related to our use of your personal data, please contact us by using the contact points below:

Oticon A/S  
Re.: Data Privacy  
Kongebakken 9  
DK-2765 Smørum  
E-mail: [privacy@demant.com](mailto:privacy@demant.com)

In this privacy notice, "we", "us" and "our" refer to Oticon A/S.

### PERSONAL DATA WE COLLECT AND USE

#### Collection of non-personal aggregated data

When you use the App, we may automatically collect general information. The information collected cannot be used to identify you as an individual, as we aggregate data across all users of the App. The information is only used in aggregate form to tell us how the application features are used in general, for instance when a feature is typically activated and/or how extensively a feature is used.

#### Collection of personal data

To use the App, you need to create an Oticon account. This account can be created through the App. Account registration requires you to submit your e-mail address and a password of your own choice.

When you register with your Oticon account and start using the App, we collect the following types of information:

- Your user ID and email address for authentication purposes. We keep your account data as long as your account exists.

To enable the remote session with your hearing care professional, the following types of information will be processed during your remote visit:

- Your audiogram, serial number and settings of your hearing instruments and any chat messages exchanged between you and your hearing care professional during the remote fitting session. We use this data to enable the remote fitting session. We only keep the data during the remote fitting session. However, if the remote fitting session is interrupted, we will keep the data for up to 24 hours to be able to restore the session.
- Technical data related to the remote fitting session. We use this data for service and troubleshooting purposes, and we keep the data for 90 days after the remote fitting session.
- Audio and video data transmitted between you and your hearing care professional during the remote session. We use this data to provide communication between you and your hearing care professional. This data is live streamed, and we do not keep the data after the remote session.

We only process personal data about you, which is relevant and sufficient for the purposes defined above. This means that we do not use your personal data more extensively than necessary for the specific purpose.

# Oticon RemoteCare

## LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

When you use the App, we collect information relating to your use of hearing aids. As the use of hearing aids may reflect health information, we ask for your explicit consent to process your data, when you activate the App. Our legal basis for processing your personal data is your explicit consent, cf. GDPR art. 9, 2. (a).

Your consent is voluntary, and you can withdraw your consent at any time in the "Data and Privacy consent" section in the app. You can also withdraw your consent by contacting us using the contact information outlined at the top of the document if you wish to withdraw your consent or want further information.

Please note, that if you withdraw your consent, you are no longer able to use the App, since we are not able to provide you with functionalities of the App without collecting your personal data.

You can also easily stop all collection of information in the App by uninstalling the App. You may use the standard uninstall processes available as part of your mobile device or via the mobile application marketplace or network.

Please note, that we are not automatically informed when you uninstall the App. Accordingly, we continue to process personal data concerning you until inactivity will result in deletion of inactive accounts, or if you contact us and object to the processing.

## CHILDREN

We restrict the use of the App to individuals aged 18 and above. We do not knowingly collect, maintain, or use personal information from children under the age of 18.

## HOW WE SHARE YOUR PERSONAL DATA

We may share your personal data with other companies within the Demant Group to operate and service the App. Please refer to the organizational chart in our latest annual report to see which companies are part of the Demant Group. You can find our latest annual report at [www.demant.com](http://www.demant.com).

We may also share your personal data with service providers, who perform services and functions related to the App on our behalf. Any such service providers will not be authorized to use your personal data for any other purposes, and they will always be under a strict obligation to keep your personal data safe and confidential.

We only use service providers that give sufficient guarantees to implement appropriate technical and organizational measures that meet the requirements of the relevant data protection laws, including ensuring the protection of your data privacy rights.

We use Microsoft's Azure cloud services and the personal data we collect are transferred to and stored in Microsoft's data centres located in the EU & US. Any transfer of data from EU countries to Microsoft's data centres in US are governed by the EU Commission's Standard Contractual Clauses, which ensure an adequate level of data protection. You can read more about the services and regulatory compliance here: <https://www.microsoft.com/en-us/trustcenter/compliance>.

If we transfer your personal data to an affiliated Demant company or a service provider located in a jurisdiction outside EU/EEA or the European Commission-approved countries providing 'adequate' data protection, we will always ensure that adequate safeguards are taken to ensure data protection, e.g. by way of the EU Commission's Standard Contractual Clauses.

## YOUR PRIVACY RIGHTS

Under the GDPR and as result of our processing of your personal data, you may exercise certain privacy rights. These are:

- The right to access 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

Your privacy rights may be subject to conditions and/or exemptions, e.g. ensuring other people's privacy, protection of trade secrets and intellectual property rights or compliance with legal obligations.

If you want to exercise your rights, you can contact us at the contact points listed above.

If you have a concern related to how we use your personal data, please contact us by using the contact points outlined at the top of the Privacy Notice, 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 file a complaint with the relevant national data protection authority. In Denmark, the relevant data protection authority is Datatilsynet (tel: +45 3319 3200 / e-mail: dt@datatilsynet.dk). Alternatively, you may contact the relevant data protection authority in your country of residence or work.