



Amplifon Group Australia - Privacy Policy

Welcome to Amplifon Group. This Privacy Policy explains how and why we collect, use, hold, disclose, and protect your Personal Information.

“We”, “us”, “our” and “Amplifon Group” means:

- National Hearing Centres Pty Ltd (ACN 075 889 262);
- Bay Audio Pty Ltd (ACN 122 385 746) (**Bay Audio**);
- Attune Hearing Pty Ltd (ACN 050 398 813) (**Attune**); and
- Amplifon Australia Holding Pty Ltd (ACN 147 231 561).

These companies are wholly owned and operated by the same global parent company Amplifon S.p.A., being a company incorporated and publicly listed in Milan, Italy. Amplifon S.p.A complies with the European Union’s GDPR, which is one of the strongest data protection and privacy frameworks in the world.

If you provide us with your Personal Information, you consent to use handling that information in accordance with this Privacy Policy, which may be updated from time to time.

1. What is Personal Information?

Personal Information is any information or an opinion about an identified individual or an individual who can be reasonably identified from the information or opinion. Information or an opinion may be Personal Information, regardless of whether it is true.

Examples of Personal Information include:

- an individual’s name, signature, address, phone number or date of birth;
- photographs;
- Sensitive Information;
- employment history; and
- government identifiers such as Medicare number or driver licence number.

1.1. What is Sensitive Information?

Sensitive information is personal information that includes information or an opinion about an individual’s:

- racial or ethnic origin
- political opinions or associations
- religious or philosophical beliefs
- trade union membership or associations
- sexual orientation or practices
- criminal record
- health or genetic information
- some aspects of biometric information.

Generally, Sensitive Information has a higher level of privacy protection than other personal information.

2. What Personal Information does the Amplifon Group collect?

Amplifon Group may collect Personal Information from you and about you that is necessary for us to deliver our hearing services and products to you.

The types of Personal Information we may collect and hold may vary depending on the nature of our interaction with you and may include:

- identifying and contact information (such as your name, postal address, email address and telephone phone number);
- date of birth;
- information about your next-of-kin, attorney, guardian or preferred/emergency contact person (**Representative**);
- health information relevant to us supplying hearing devices and services to you;
- credit card and payment details;
- government identifiers (such as Medicare numbers and driver's licence); and
- responses to any qualitative surveys issued by us.

We collect, hold, and use your Personal Information so that we can:

- provide and improve our services (such as to perform diagnostic hearing tests and fit hearing devices)
- provide and improve our products (such as Cochlear implants and other hearing devices;
- manage our relationship with you (such as scheduling appointments for you);
- communicate with you, respond to your enquires or complaints and provide customer support;
- to comply with our legal obligations and resolve disputes;
- identify and tell you about other products or services that we think may be of interest to you; and/or
- to consider you for any current or future employment opportunities if you are a job applicant.

If you do not provide us with your Personal Information, we may not be able to provide you with some of our products or services, communicate with you or respond to your enquiries.

3. How the Amplifon Group collects personal information

3.1. Who do we collect from?

We may collect Personal Information from you when you attend our shops and/or clinics, interact with our website and mobile apps, contact us (e.g. call us, send us an email or letter, or interact with us via social media) or when you interact with one of our marketing campaigns or promotions. We may also receive Personal Information about you from third parties such as:

- referrals from your medical provider (such as a GP), employer (or prospective employer) or other healthcare practitioner;
- your next-of-kin, legal guardian or carer, if we are unable to obtain the Personal Information from you directly or with your consent;

- organisations such as Cochlear Australia, the Commonwealth Hearing Services Program (HSP) and/or the Commonwealth Department of Health and Aged Care, the Traffic Accident Commission (**TAC**), WorkCover, workers compensation and/or private health insurer(s), Medicare Australia, the National Disability Insurance Administration (**NDIA**), banks and commercial financial service lenders/funders (such as 'Buy Now Pay Later' providers) and/or your employer (**Funding Organisations**);
- organisation that we may partner with who refer their customers, employees or stakeholders to us, such as BUPA, Suncorp and select pharmacies (**Partner Organisations**); and
- third party marketing organisations that may provide your personal information to us, if they consider you may be interested in our products or services.

3.2. Hearing aids

Some models of hearing aids may automatically collect and/or store certain information (e.g., hours of use per day and noise characteristics of the environments) that, in some limited cases, may be linked to you. In those cases:

- as hearing aids are manufactured by third parties, we may not directly hold or control such personal information stored by your device(s);
- personal information collected by those hearing aids may be stored, managed and/or controlled by the device's manufacturer and/or their third party agents;
- such personal information or data may be transferred to and processed by our apps as well as, or instead of, the third party hearing aid manufacturer's app (if you choose to use those apps);
- our apps may also collect additional information about your use of the apps, and the hearing aids we supplied you; and
- we may use personal information about you collected through our apps to better understand your behaviour, preferences and habits, including to determine if there are other services or products that may be relevant to your clinical or lifestyle needs.

4. Who we disclose your personal information to and why

We may disclose Personal Information to external service providers so that they may perform services for us or on our behalf, such as subcontractors, service providers (such as IT providers, call centre operators and auditors) or consultants. We may also disclose your Personal Information:

- (a) to Government departments to check if you are eligible to receive products and services under certain government funded programs such as the HSP;
- (b) to your referring healthcare practitioner (for example, providing the results of your audiology test)
- (c) where we are required or authorised by law to do so;
- (d) to a hearing device manufacturer (for example, in circumstances relating to warranties of the product);
- (e) to a Funding Organisation;
- (f) to a Partner Organisation (but only if you were referred to us by that Partner

- Organisation);
- (g) where you have expressly consented to the disclosure, or consent may be reasonably inferred from the circumstances;
 - (h) to your Representative, especially if you have difficulties communicating due to hearing impairment or disability;
 - (i) between the Amplifon Group of businesses as we operate under common management and control, share the same operating systems and share the same support services; or
 - (j) where we need to share it with data processors to operate our business and provide products or services to you.

We may also use and disclose your personal information to certain organisations on a de-identified and aggregated basis to enable them to undertake analytics and generate insights in relation to the use of our products and services (such as hearing aid manufacturers and/or Partner Organisations).

We may share your personal information with parties involved in a prospective or actual transfer of all or part of the Amplifon Group's assets or business

For the avoidance of doubt, if you do not agree to us sharing your personal information with the Department of Health and Aged Care, the Amplifon Group will be unable to provide you with hearing and related services under the HSP funding framework.

5. Security of Personal Information

The Amplifon Group stores the personal information of HSP participants, customers referred to us by certain Partner Organisations and Bay Audio customers on its premises and/or electronically in Australia. For all other individuals, the Amplifon Group primarily stores personal information on its premises and electronically in Australia, but some limited personal information may be stored overseas by our overseas related companies and trusted services providers. The countries where our overseas related companies and services providers may be located are listed in Section 8.4 below.

We will also take reasonable steps to destroy or de-identify Personal Information that we no longer require, unless we are legally required to retain it.

While we strive to protect your Personal Information, we cannot guarantee its absolute security.

6. Limited transfer personal information outside of Australia

The Amplifon Group does not store or disclose Personal Information outside Australia, except in limited circumstances as described below.

6.1. HSP participants

If you are a customer and HSP participant, your personal information will be stored in Australia and will not be taken outside of Australia. From time to time, we may permit our overseas related companies such as Amplifon S.p.A and our service providers located overseas to access and view your personal information as reasonably necessary to assist us to provide you with our products and services, and to carry out the above purposes. The countries where our overseas related companies and services providers may be located are listed in Section 6.4 below.

6.2. Customers referred by Partner Organisations

The Personal Information of customers referred to us by a Partner Organisation(s), may be subject to further controls and safeguards, as per contractual obligation with the Partner Organisation in question.

6.3. Bay Audio customers

The Personal Information of Bay Audio customers will be stored in Australia, and we will use our best endeavours to ensure that your personal information is accessible only from within Australia, except where:

- a business is providing a support or maintenance service to Bay Audio or its subsidiary for medical equipment or medical software and that access is incidental to the proper performance of a support or maintenance contract or arrangement; or
- otherwise permitted by the Foreign Investment Review Board or the foreign investment division of the Treasury of the Commonwealth of Australia from time to time.

6.4. EU Customers and GDPR

If you are a citizen or resident of the European Union (EU) you have a right under the EU's General Data Protection Regulation (GDPR) to:

- a) access your data;
- b) have your data deleted or corrected where it is inaccurate;
- c) object to your data being processed and to restrict processing;
- d) withdraw consent to having your data processed;
- e) have your data provided in a standard format so that it can be transferred elsewhere; and
- f) not be subject to a decision based solely on automated processing.

(collectively referred to as **Data Subject Request**)

We have processes in place to deal with Data Subject Rights requests. Our actions and responsibilities will depend on whether we are the Controller or Processor of the personal data at issue. Depending on our role as either a Controller or Processor, the process for enabling Data Subject Rights may differ, and are always subject to applicable law.

Please refer to the Contact Details section of this policy if you would like to make a GDPR Data Subject Rights request.

6.5. Other individuals

For all other Amplifon Group customers not listed in Sections 6.1 to 6.4 above, we may provide limited disclosure of your personal information to our overseas related companies such as Amplifon S.p.A and our trusted specialist service providers located overseas (such as technical support) to assist us in the delivery of our products and services.

The countries where our overseas related companies and overseas service providers are located include:

- Italy;
- Denmark;
- Ukraine;
- Netherlands;
- Philippines;
- India;
- New Zealand;
- Sri Lanka;
- Canada; and
- USA.

It is important to note this list may change from time to time.

7. Communicating with you

7.1. Service-related communications

If you are a customer, we may need to contact you about our ongoing and/or future provision of services to you after your first appointment with us (including by telephone call, SMS, email and/or mail).

7.2. Marketing communications

If you consent to receive marketing communications from the Amplifon Group (and you are were not referred to Amplifon by a Partner Organisation with which we have agreed not to send marketing materials), we may use your Personal Information to contact you via various channels such as by telephone, SMS, social media, email and/or mail; about special offers, discounts, promotions, products and services offered by us, or other organisations with whom we have a relationship.

You can opt-out of receiving marketing communications at any time by contacting the Amplifon Group Privacy Officer in writing using the contact details set out below.

As noted above, even if you request not to receive marketing material from the Amplifon Group, we will still contact you in relation to your ongoing clinical hearing care, while you remain our customer.

As audiologists who are bound by professional and ethical obligations, we reasonably infer that we have your consent to contact you for these types of purposes, while you remain our customer noting that in general, a person's hearing often deteriorates more rapidly with age, and also hearing aid technology is rapidly and constantly improving.

8. How can you access or correct your personal information and contact the Amplifon Group?

You may request access to or correction of Personal Information that we hold about you by contacting us directly. Our contact details are set out below. Please understand there are some circumstances in which we are not required to give you access to your Personal Information, but we will advise you if these circumstances apply to your request.

There is no charge for you directly requesting access to your Personal Information, but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material).

We will respond to your requests to access or correct Personal Information in a reasonable time and will take all reasonable steps to ensure that the Personal Information we hold about you remains accurate, up-to-date and correct.

In some circumstances and in accordance with the Privacy Act and applicable Health Records Acts, the Amplifon Group may not permit access to your personal information, or may refuse to edit your personal information, in which case we will provide you with reasons for this decision.

9. How the Amplifon Group handles complaints

If you have a complaint about the way in which we have handled any privacy issue, including your request for access or correction of your Personal Information, you should contact us. Our contact details are set out below.

We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this, and any subsequent internal investigation.

If you remain unsatisfied with the way in which we have handled a privacy issue, you may make a complaint to the Office of the Australian Information Commissioner (OAIC) (www.oaic.gov.au).

10. Contact Details

If you have any questions, comments, requests, complaints, or concerns, please contact the Amplifon Group Privacy Officer:

- by mail: Level 7, 150 Lonsdale Street, Melbourne, Victoria 3000
- by telephone: 1800 828 047 (free call within Australia)
- by email: AU-Privacy@amplifon.com

11. Changes to our Privacy Policy

We may update this Privacy Policy from time to time. The updated version will be posted on our website, with the effective date. Please check this page periodically for any changes.