

EAR LAB'S PRIVACY POLICY

Welcome to the privacy policy of Ear Lab Limited (**EarLab**).

EarLab 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 you visit our website and tell you about your privacy rights and how the law protects you.

This privacy policy was completed in May 2022.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Name: EarLab

Email address: info@earlab.co.uk

Postal address: Ear Lab Limited, 56b High Street, Haslemere GU27 2LA

Telephone number: 01428 870111

The type of personal information we collect

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, last name, title, date of birth and gender.
- **Contact Data** includes address, email address and telephone numbers.
- **Financial Data** includes payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for the purposes of making a booking and is only used by us to help fulfil that booking.

We also receive personal information indirectly from Ear Wax Removal UK if you provided your personal information to them, and website usage data from 123-Reg.

We may share this information with Timely for the purposes of making bookings, keeping records and managing our communications with you.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

1. **You have consented to us processing your personal information.** You are able to withdraw your consent at any time. You can do this by contacting us using our contact details above.
2. **We have a contractual obligation.** This means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
3. **We have a legal obligation.** This means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.
4. **We have a legitimate interest.** This means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

How we store your personal information.

Your information is securely stored.

The data we collect when you make an online booking is only used by us to help fulfil that booking. We may contact you in relation to this booking. When making an online booking, no financial or card data is stored directly by us but may be stored by Timely on their servers.

When making an online booking, you may be asked some medical questions about your ear condition. This data is stored together with your personal information on the servers of Timely.

Any information you supply to us by e-mail will only be used to fulfil your enquiry or, if you have chosen to book an appointment by email, to fulfil that booking. Emails sent and received are stored on the servers of 123-reg.

We may use Google Analytics to help us monitor visits to the website so that we can make improvements. The information collected is anonymous and is not used in a way that could

identify you. We do not implement (or allow Google to) any tracking that could be used to target adverts to you. We use standard cookies implemented by 123-reg to make our website work. It is possible to opt out on first visiting our site or via the settings in your web browser.

Your data protection rights

Under data protection law, you have rights including:

1. **Your right of access.** You have the right to ask us for copies of your personal information.
2. **Your right to rectification.** You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
3. **Your right to erasure.** You have the right to ask us to erase your personal information in certain circumstances.
4. **Your right to restriction of processing.** You have the right to ask us to restrict the processing of your personal information in certain circumstances.
5. **Your right to object to processing.** You have the right to object to the processing of your personal information in certain circumstances.
6. **Your right to data portability.** You have the right to ask that we transfer the personal information you have us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us on the contact details above if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at the contact details above.

You can also complain to the Information Commissioner's Office (ICO) if you are unhappy with how we have used your data.

The ICO's address is: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

ICO helpline number: 0303 123 1113

ICO website: www.ico.org.uk