

Privacy Policy Otoconsult BV

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Otoconsult is committed to protecting privacy and data. The purpose of this privacy policy is to inform you about the processing of personal data. This privacy policy applies to all direct customers, visitors, suppliers, and applicants. Otoconsult will process personal data with respect for your privacy and in compliance with applicable privacy laws.

We reserve the right to make changes to this privacy policy at any time. To stay informed of any changes, we ask you to consult this privacy policy on a regular basis.

This privacy statement was last modified on: 27/03/2024.

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1 WHAT PERSONAL DATA DOES OTOCONSULT WORK WITH?

Customers	Applicants
<ul style="list-style-type: none"> ▪ Identification data ▪ Profession and employment ▪ Financial peculiarities 	<ul style="list-style-type: none"> ▪ Identification data ▪ Personal characteristics ▪ Education and training ▪ Profession and employment ▪ Living habits
Patients	
<ul style="list-style-type: none"> ▪ None 	

See [Otoconsults website](#) to learn about the data processing policy in our software products.

2 CUSTOMERS' PERSONAL DATA

2.1 Based on the execution of a contract

- **When requesting a quote**
Otoconsult processes personal identification data to make a proposal for our products and services.
- **When processing an order, following up invoices and commercial agreements**
We process personal identification data and professional data for the correct processing and follow-up of the order or delivery.

2.2 Based on justified interest

- **When handling a question, providing assistance and offering information on your request**
You can contact Otoconsult through various channels. We only use the personal information you provide to answer your questions.

3 APPLICANTS

3.1 Based on the execution of a contract

- **When applying for a job**
During the application process, Otoconsult processes personal data in order to obtain the best possible picture of the applicant we have in front of us.

3.2 Based on your permission

- **When setting up a recruitment reserve**

If Otoconsult does not currently hire an applicant but would like to contact them for future opportunities, Otoconsult will keep the CV for one year unless you specifically ask not to do so.

3.3 Based on justified interest

- **When performing competency tests during the application period**

To screen an applicant, Otoconsult carries out an assessment of the candidate's competencies.

4 WHO DO WE SHARE YOUR DATA WITH?

Otoconsult does not share your personal data with third parties, unless:

- Prior consent
- In the context of regulations or legal proceedings
- Legislative or judicial authorities which so request

5 SECURITY OF YOUR PERSONAL DATA

Otoconsult recognises that the security of personal data is part of data protection. Therefore, Otoconsult takes appropriate technical and organizational measures to protect your personal data from unauthorized processing or access to prevent misuse.

6 STORAGE OF YOUR PERSONAL DATA

Otoconsult only retains your personal data for the minimum period necessary to fulfil its purposes. Except when resolving disputes or if a longer retention period is required by law. Non-personal information may be kept for statistical purposes without any time limit.

7 COOKIES

Cookies are text files that are placed on your computer to collect standard internet logging information and behavioural information. This information is used to monitor the visitor behaviour of the website and to compile statistical reports about the website. More information about our cookie policy can be found in our Cookie Policy.

8 WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?**8.1 How can you exercise your rights?**

You can exercise your rights by sending an e-mail to info@otoconsult.com. We will then have one month after receiving the notification to answer your request. The period of one month can be extended after a message and explanation.

For the sake of completeness, we would like to inform you that if Otoconsult does not respond to your request or refuses it, you always have the right to lodge a complaint with the Data Protection Authority, Drukpersstraat 35, 1000 Brussels, Tel +32 (0)2 274 48 00, or via the e-mail address contact@apd-gba.be.

8.2 What are your rights?

- **Right of access:**
You can ask us what personal data, the origin, what we process it for and with whom we share your personal data.
- **Right to rectification:**
If information is incorrect, you can ask us to correct it.
- **Right to erase your data:**
If data is not processed lawfully or if your data is not needed longer than the purpose for which it was collected, you can ask us to delete your data.
- **Right to limitation of processing:**
By limiting the processing of your personal data, your personal data can still be tracked, but their use is limited. If you have requested a processing restriction, we may only store your data. This means that your data can no longer be used for other transactions.
- **Right of objection:**
You have the right to object to the fact that your data will be processed.
- **Right to withdraw permission:**
If the processing of your personal data is based on the basis of consent, you have the right to withdraw this consent at any time.
- **Right to data portability:**
You have the right to obtain the personal data provided by you and you have the right to transfer these personal data to another data controller.

9 PERSONAL HEALTH INFORMATION (PHI)?

- **Ownership of data**

All Audiqueen data are stored solely in the Audiqueen database that is owned by the client and located on the local servers of the hospital or medical unit. The access is exclusively controlled by the client. Users with administrator rights decide which other users are authorized to view or edit the data. All user access is password restricted. The session logger gives an overview of relevant activities (who has had what kind of access to which patient's file?).

- **Accessibility of data**

Neither Otoconsult nor any other third party has access to the data in Audiqueen's database if this is not explicitly granted to them by the owner, for instance for specific servicing tasks. Audiqueen shares no PHI with third parties or with any cloud services.

- **Exceptional access in the context of servicing**

If Otoconsult or one of its employees requires access to Audiqueen's tables in the context of a service intervention, you need to grant him/her access rights under the conditions you define. The use right will always be limited in time to what is required to successfully execute the intervention. Otoconsult is bound by the European GDPR and privacy regulations. Otoconsult shall not store PHI on its own infrastructure if this is not necessary for the service intervention and it shall not be stored for longer than required for the intervention. All Otoconsult employees and collaborators are bound by confidentiality.