

# PRIVACY NOTICE

## Introduction

The protection of the privacy and personal data of our customers, partners and employees is important to us and we work hard to ensure to always process personal data in line with national and EU-legislation.

This Privacy Notice describes how you, as an individual can use your rights under the EU General Data Protection Regulation (EU) 2016/679 (“GDPR”). Here, we also describe the general principles for processing personal data within OTICONS company team, in the following legal entities:

Film and Music Oticons Productions Ltd. (tax ID no. BG204810135)

Which of the abovementioned companies which, in a specific case, is responsible for processing your personal data depends on the nature of your interaction with us. In some cases, two or more companies may be jointly responsible for the processing.

This Privacy Notice is relevant for all individuals who visit our websites, email OTICONS, are included in invitation lists or lists used for sending out news letters or for anyone who otherwise contacts or interacts with us.

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## **Which personal data is processed by OTICONS and from which source does the personal data originate?**

We will process different personal data about you depending on (i) the situation in which you have contact with OTICONS, (ii) your choices, including your privacy settings in your device or browser, and (iii) the devices and functions you use.

Normally, we process personal data in order to contact individuals or business contacts and in this context we usually only process information such as names, e-mail addresses, telephone numbers and similar contact details. Further, we collect information that you provide us with as well as the content of e-mails that you send to us. If you apply for a position at OTICONS we may also, subject to your prior consent, process information that you have stated in your application, your CV or information obtained from third parties when we conduct reference checks.

The personal data that we process usually originates from the individual (e.g. from a job application or from an e-mail) or is stated in agreements that we enter into. However, we may also obtain personal data from entities within our group of companies, our partners, from job recruiters or other sources which are available for the general public such as telephone directories and websites. We also collect information by using cookies on our websites and by using software which is run on your device. For more information about how we use cookies, please [click here](#).

Normally, you can decide what personal data we may collect about you. When asked to provide personal data, generally you may refuse to do so. However, if you choose not to provide the personal data that we need in order to interact with you, there is a risk that we will not be able to contact you or that we may not be able to provide you with what you ask for. Please note that if you ask us not to contact you via e-mail, we will keep a copy of your e-mail address in a list of blocked recipients in order to ensure that no future e-mails will be sent to you.

## **Why and how do we process your personal data?**

We process personal data in order to cooperate efficiently with our partners, distributors and others who interact with OTICONS as well as for the purpose of fulfilling our contractual and legal obligations.

Generally, the processing activities in the context of your visit to and use of our website are based on our legitimate interests to operate an internet website for general information and communication purposes, to optimize our website and to protect it from attacks. Exceptionally, we may process personal data to fulfil our legal obligations, in particular with regard to the relevant authorities in cases of unauthorized interference with our website.

In some cases, for example in order to send out an invitation to a film premiere, a film exhibition or an event which you have not previously announced your interest in, we may do so based on our legitimate interest. In other words, we process your personal data after having balanced our interest in using your personal data for the purpose of making such invitations against your interest of not having the personal data processed by us. We believe that our processing in such situations will not have an unwarranted impact on you. However, if you do not wish to obtain such invitations in the future, please send us an e-mail to: [ozge@oticons.com](mailto:ozge@oticons.com).

We may process names, images and recorded material in order to inform about and market our business and our films on our website, on printed material and on social media. We process the personal data on the basis of a balance of interest and OTICONS' legitimate interest to market its business and films. Please contact us if you would like to know more about how we have conducted this balance of interest

If you are a customer, partner or a journalist we may also, based on a legitimate interest, use your contact details in order to send you information and news letters which we believe may be relevant for you as a professional. You can always unsubscribe from such e-mails by sending us an e-mail to: [ozge@oticons.com](mailto:ozge@oticons.com).

If you apply at OTICONS for a position or an internship or send us any IP that is accompanied by a CV that contains personal data, such personal data will be used to assess your application. The personal data will be processed only after you have provided us with a consent to do so, such consent to be given when you file your application in our recruitment tool. Your personal data will

mainly be disclosed to our talent agents but may also be used when we conduct a reference check.

To the extent that we wish to process personal data for another purpose than the purpose for which the data was originally collected, you will be provided with information about this before, or at the time when the personal data is collected, and we will, unless there is another legal basis for such processing, seek your consent for such processing. As an alternative, we may seek your consent after having collected the personal data, but before we process the personal data for a new purpose.

### **How may the personal data be shared and transferred?**

Generally, the personal data that we collect is used within OTICONS only. However, it may be necessary for us to share your information (i) with suppliers that provide services and technical support; (ii) to the extent required to do so due to a court order or pursuant to applicable laws; and (iii) as part of a joint venture, such as a merger or sale of assets. To the extent personal data is shared or transferred to third parties, we make sure that these companies comply with our data protection requirements, or comparable requirements, and are not allowed to use the personal data they receive for any other purpose.

### **Where is personal data stored and processed?**

Personal data which is collected and used by OTICONS is generally stored and processed in the region in which you have your residence, in any countries where the partners, subsidiaries or suppliers of OTICONS conduct their business. The location for storing our data is chosen based on criteria such as efficiency and performance but also to create redundancy in order to protect data in case of power cuts etc. We take actions to ensure that the personal data that we collect is processed in accordance with the provisions of this Privacy Notice and in accordance with applicable laws.

To the extent your personal data is transferred to a third party based outside the EU/EEA, we will take appropriate technical and organizational measures in order to prevent unauthorized or unlawful processing of personal data. Such measures may include the use of the standard

contractual clauses issued by The European Commission and other appropriate security measures.

## **For how long will we retain your personal data?**

Your personal data will generally be either deleted or anonymized when processing of your personal data is no longer necessary for the purposes for which they were collected. Sometimes it may be necessary for us to continue to process your personal data for a longer period in order to meet legal requirements and to resolve disputes. Personal data processed in conjunction with collaborations, sale and delivery of products or services may by way of example be kept for a longer period due to mandatory applicable accounting laws.

Personal data regarding individuals who apply for a position at OTICONS is normally retained during the recruitment period and maximum two years thereafter.

Please note that the necessity to keep personal data may vary depending on the nature of the personal data and depending on the context. Hence the retention period for personal data may vary.

## **Your rights and how to exercise them**

If you are an individual whose personal data is being processed by the OTICONS legal entity, you have the following rights:

- A right to obtain a confirmation as to whether or not we process your personal data, and if we do, request access to your data (in accordance with what is stipulated in GDPR, article 15).
- A right to request completion or correction of your personal data to the extent it is incomplete or incorrect.
- In certain situations, you have a right to request erasure of your personal data (subject to certain exceptions). Please note that there may well be reasons why an immediate deletion may not be possible (for example where retention is required to meet legal or regulatory obligations).

- You have the right to request that we restrict the processing of your personal data in certain situations and to ask us not to send you any direct marketing regardless of the means of communication.
- If your personal data is processed on basis of your consent, you have the right to withdraw your consent at any time. The withdrawal of your consent does not affect the lawfulness of processing based on consent before its withdrawal.
- Where the processing takes place on the basis of your consent or contract, and is carried out by automated means, you have the right to receive the personal data which you have provided to us in a structured and machine-readable format and have a right to transmit those data to another controller of personal data (the so called right to data portability).
- You also have the right to lodge a complaint either directly to us at [ozge@oticons.com](mailto:ozge@oticons.com) or with a competent supervisory authority.

## **Changes to this Privacy Notice**

We will update our Privacy Notice to reflect customer feedback and changes to our processing of data. When the Privacy Notice is updated, the date at the top of the document will change and the changes are described in the Update section below. If we would make any material changes to this Privacy Policy or to how OTICONS process personal data, you will to the extent required by law, be notified via the website or e-mail before such changes come into force. Please read this Privacy Notice from time to time to stay informed about how OTICONS protects your personal data.

## **Contact us**

If you have any question relating to your personal data or wish to exercise your rights, you can get in touch with us by sending us an e-mail at: [ozge@oticons.com](mailto:ozge@oticons.com).

\* To the extent your personal data is included in e-mail correspondence with OTICONS legal entity, the general rule is that the company will be regarded as the controller of the personal data at hand.