



EHIMA Commitment for Privacy

as of 22 November 2018

The European Hearing Instrument Manufacturers Association (“EHIMA”) and its members together with their business partners handle personal information daily. This may be sensitive information that requires special protection as it relates to hearing impairments, a health aspect. EHIMA wishes to express to its business partners and the public its unequivocal commitment to the lawful, safe, and prudent handling of personal data, not least in compliance with the EU General Data Protection Regulation (Regulation (EU) 2016/679 - GDPR) and with applicable local data privacy laws in general.

1. EHIMA and its members will always act in compliance with the letter and the spirit of the GDPR to protect the personal data of its business partners and users of their products.
2. EHIMA’s and its members’ actions in relation to personal data will be based on the principles of fairness, cooperation, lawfulness, and progress.

Fairness means that EHIMA and its members recognize that many of the users of their products may be more vulnerable than ordinary consumers. EHIMA and its members will be transparent about their intended purposes for processing personal data, inform users appropriately, and honor the wishes of users with respect to their personal data. Any processing system implemented by EHIMA and its members will be also designed with the need for appropriate protection in mind. EHIMA and its members will act swiftly upon requests by data subjects and will endeavor to make the process of correcting or deleting personal data, or ceasing the use of personal data, as simple as possible. When acting as a controller, EHIMA members will, in connection with any personal data security breaches, undertake all required reporting, keeping in mind the rights and freedoms of all individuals affected, including users and customers.

Cooperation means that EHIMA and its members will work closely and in good faith with all parties who are engaged in supporting users in receiving the full benefit from the products that EHIMA’s members produce. EHIMA will seek both the opinion as well as the input of associations representing audiologists and cooperate with them in putting users first with respect to data privacy issues. EHIMA and its members will further negotiate in good faith with any business partners whenever written agreements are required to set out rights and obligations with respect to personal data that is to be processed.

Lawfulness means that as a minimum, EHIMA and its members commit to complying with the GDPR where applicable as well as other local data privacy law requirements. This means for example that EHIMA and its members will collect only such personal data as are necessary for lawful purposes, will anonymize or pseudonymize such data when relevant, process, transfer, store and delete the data safely and keep it only as long as necessary, and will be transparent with data subjects in the event of a data breach. EHIMA and its members will process personal data under appropriate technical and organizational security measures to ensure protection against unauthorised or unlawful processing, accidental loss, destruction or damage. Furthermore, EHIMA and its members will not transfer any personal data collected to a country or territory outside the European Economic Area (third country) unless permitted to do so under the law.

Progress means that EHIMA and its members will continuously review their data privacy practices to ensure adequate data privacy at any time. EHIMA and its members welcome feedback to their practices and contributions by their business partners and the public.