Privacy Policy

Manufacture of custom-fit earplugs/otoplastics

We take the protection of your personal data very seriously. We process your data in accordance with the applicable legal provisions on the protection of personal data, in particular the EU General Data Protection Regulation (EU GDPR) and the country-specific implementing legislation applicable to us. This privacy policy provides you with comprehensive information about the processing of your personal data by UVEX ARBEITSSCHUTZ GMBH and the rights to which you are entitled.

Personal data refers to information that enables the identification of a natural person. This includes your name, date of birth, address, telephone number, email address and your IP address.

Data is considered anonymous if no personal link to the user can be established.

This Privacy Policy applies to the manufacture of custom-fit earplugs/otoplastics using a silicone impression process (analogue method) as well as a digital 3D ear scan (digital method). Depending on the project, the data is collected either directly by UVEX ARBEITSSCHUTZ GMBH or by system partners who have been commissioned by your employer and who then forward the data to us.

Data controller and data protection officer

UVEX ARBEITSSCHUTZ GMBH
Würzburger Straße 181–189
90766 Fürth
https://www.uvex-safety.com
Telephone 0911 / 97 36-0
Email: safety@uvex.de

Data Protection Contact: datenschutz@uvex.de

Your rights as a data subject

Firstly, we would like to take this opportunity to inform you of your rights as a data subject. These rights are set out in Articles 15–22 of the EU GDPR.

These include:

- The right of access (Article 15 of the EU GDPR),
- The right to erasure (Article 17 of the EU GDPR),
- The right to rectification (Article 16 of the EU GDPR),
- The right to data portability (Article 20 of the EU GDPR),
- The right to restriction of processing (Article 18 of the EU GDPR),
- The right to object to data processing (Article 21 of the EU GDPR).

To exercise these rights, please contact: datenschutz@uvex.de.
The same applies if you have any questions regarding data processing within our organisation or wish to withdraw your consent. You also have the right to lodge a complaint with a data protection supervisory authority.

Purposes and legal bases for processing

We process your personal data for the following purposes:

- Manufacturing custom-fit earplugs/otoplastics
- Documenting functional checks of the earplugs/otoplastics using uvex OTOCheck
- Carrying out fittings and quality checks
- Processing orders
- Handling complaints

The processing takes place in connection with the contractual engagement of UVEX ARBEITSSCHUTZ GMBH by your employer for the production of custom-fitted earplugs/otoplastics.

The processing of your personal data is carried out exclusively on the basis of the consent you have given to your employer. The legal basis is Article 6(1)(a) of the GDPR and Article 9(2)(a) of the EU GDPR.

Recipients of the data / Categories of recipients

The data is either (1.) collected directly by UVEX ARBEITSSCHUTZ GMBH (digitally or analogously) or (2.) collected by system partners. Where data is collected by system partners, this data collection takes place under their own responsibility. This privacy notice relates exclusively to the processing of personal data by us, insofar as data is transferred to us by system partners (Article 14 of the EU GDPR).

(1.) During direct analog data collection by UVEX ARBEITSSCHUTZ GMBH, an analog silicone impression of your ear is taken on-site. The negative mold of your ear geometry is scanned and digitally stored for the production of your custom-fit earplug/otoplastic. The physical impression of your ear geometry is then destroyed.

When carrying out the digital ear scan, however, your ear geometry is recorded directly and digitally. To carry out the digital ear scan, we use the 'OtoScan' product from Natus Medical GmbH, Robert-Koch-Str. 1, 82152 Planegg. The OtoScan creates a digital 3D model, which is then stored in Natus Medical GmbH's cloud. The data is stored there together with your name, so that Natus Medical GmbH can establish a link to your identity. A data processing agreement has been concluded with Natus Medical GmbH.

(2.) If the silicone impression process is performed by system partners, they process your data on their own responsibility and subsequently forward the data to us.

(3.) In the final step, we forward your data to our manufacturing partners. We take care to use only reliable manufacturing partners – your data is processed within the EU and by a manufacturing partner in Switzerland. The European Commission has determined that Switzerland offers an adequate level of data protection. We enter into the contracts required under data protection law with our manufacturing partners.

Transfers to third countries / Intended transfers to third countries

We process your data within the European Union.

Should processing outside the European Union be necessary, we ensure that appropriate safeguards are in place in accordance with Article 44 et seq. of the EU GDPR.

Data retention period

We store your data for as long as it is required for the respective processing purpose. Please note that numerous retention periods require that data continue to be stored. This applies in particular to retention obligations under commercial or tax law (e.g. the German Commercial Code, the German Fiscal Code, etc.). Unless further retention obligations apply, the data will be routinely deleted once the purpose has been fulfilled.

In addition, we may retain data if you have given us your consent to do so, or in the event of legal disputes where we may need to use evidence within the statutory limitation periods, which can be up to thirty years; the standard limitation period is three years.

Please note that the data is processed by the manufacturing partners we use and, where necessary, is also stored there. The retention period at these manufacturing partners depends on the respective purposes of processing. This may be the case in particular if an order is placed following the survey and statutory retention obligations (e.g. under commercial or tax law) require data to be retained for a longer period.

Categories, sources and origin of the data

When collecting data analogically via the silicone impression, we process the following personal data:

- First name and surname
- Analog ear geometry
- Company affiliation

When digitally scanning your ear, we process the following data:

- First name and surname
- Date of birth
- Gender
- Digital ear geometry

Some of the data listed above constitutes health data within the meaning of Article 9 of the EU GDPR, as it is possible to draw conclusions about physical characteristics.

Automated individual decision-making

We do not use purely automated processing procedures to reach a decision.