

Bermuda Hearing Services – Personal Information Protection Policy

Effective Date: 1st January 2021

Last Reviewed: 1st January 2025

1. Purpose

At Bermuda Hearing Services (“we,” “us,” or “our”), your privacy is a priority. This Personal Information Protection Policy outlines how we collect, use, store, and protect your personal information in accordance with the **Personal Information Protection Act 2016 (PIPA)** of Bermuda.

This policy applies to all personal information collected from clients, patients, employees, contractors, and others interacting with our audiology and hearing aid services.

2. Collection of Personal Information

We collect personal information only when necessary to provide our services or as required by law. This includes, but is not limited to:

- Full name, address, contact details
 - Date of birth, gender, and identification information
 - Medical and audiological history
 - Hearing test results and reports
 - Insurance and billing information
 - Hearing aid device details and usage records
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3. Use of Personal Information

Your information is used for the following purposes:

- Providing audiology and hearing aid services
- Assessing hearing health and recommending appropriate solutions
- Coordinating care with referring physicians or specialists
- Processing payments and insurance claims

- Meeting legal or regulatory requirements
 - Internal administrative and quality assurance purposes
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4. Consent

We obtain your informed consent prior to collecting, using, or disclosing your personal information, except where otherwise permitted or required by law. Consent may be provided in writing, verbally, electronically, or implied where appropriate.

You may withdraw your consent at any time, subject to legal and contractual restrictions. Doing so may affect our ability to provide services.

5. Disclosure to Third Parties

We may share your personal information with third parties only when necessary to provide services or as required by law. Examples include:

- Referral physicians or healthcare providers
- Health insurance companies
- Regulatory or legal authorities
- Hearing aid manufacturers or service providers (with consent)

We do not sell, rent, or trade your personal information.

6. Accuracy and Access

We strive to keep your personal information accurate, complete, and up to date. You may request access to your information and request corrections where appropriate. Requests should be made in writing to the Privacy Officer (see Section 10).

7. Data Security and Retention

We take reasonable steps to protect your personal information from unauthorized access, loss, misuse, or disclosure. This includes physical, administrative, and technological safeguards such as:

- Secure storage and restricted access to records
- Password-protected digital systems
- Staff training on data privacy and confidentiality

We retain personal information only as long as necessary for the purposes described in this policy and in accordance with legal and regulatory obligations.

8. Privacy Rights under PIPA

Under Bermuda's PIPA, you have the right to:

- Be informed of how your information is being used
 - Access your personal information
 - Correct inaccurate or incomplete information
 - Withdraw consent
 - Object to certain uses of your information
 - Complain to the Privacy Commissioner if your rights are violated
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9. Policy Updates

This policy may be updated periodically to reflect changes in our practices or the law. We will notify you of material changes and update the "Effective Date" above.

10. Contact Us

If you have any questions, concerns, or requests regarding this policy or your personal information, please contact our Privacy Officer:

Privacy Officer

Bermuda Hearing Services – Rachel Burns
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