

## Privacy Policy

Updated 24 February 2021

### BACKGROUND:

DataSIM Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers, suppliers and partners and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

#### 1. Information About Us

DataSIM Limited, registered in England under company number 06789184.

*Registered and main trading address:*

BrightWater House, Market Place, Ringwood, Hants, BH24 1AP

*VAT number:* 974159192

*Contact:* Data Protection Administrator

*Email address:* [info@datasim.com](mailto:info@datasim.com)

*Telephone number:* 03700 11 90 10.

#### 2. What Does This Policy Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

#### 3. What is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

#### 4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your

personal data that we have. Please contact us using the details in Part 11 to find out more.

- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly we are using it with your consent or for the performance of the contract, and that data is processed using automated means, you can ask us for a copy of your personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

## 5. What Personal Data Do You Collect?

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name;
- Date of birth;
- Gender;
- Address;
- Email address;
- Telephone number;
- Business name;
- Job title;
- Profession;
- Payment information;
- Information about your preferences and interests.

Your personal data may have been obtained from a direct reseller or agent, or as a referral from an existing customer or mobile network.

The lawful basis under the Data Protection Legislation that allows us to use such information is article 6(1)(f) of the UK GDPR which allows us to process personal data when it is necessary for the purposes of our legitimate interests, in this case, the proper operation and functionality of our. If you contact us, you will be required to consent to our use of your personal data to contact you. In this case, our lawful basis for using your personal data will be article 6(1)(a) of the UK GDPR, which allows us to use your personal data with your consent for a particular purpose or purposes.

## 6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. This may be because the data is necessary for our contract with you, because you have consented to our

use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for the following purposes:

- Providing and managing your account.
- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and services for you.
- Communicating with you for the management of your account. This may include responding to emails or calls from you, or written correspondence.
- Supplying you with information by email and post that you have opted-in to (you may unsubscribe or opt-out at any time by email).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and telephone with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to protect your rights and fully comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

## 7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- As long as you remain a customer, supplier or partner.
- As long as it is required by law for accounting purposes after a contract.

## 8. How and Where Do You Store or Transfer My Personal Data?

We may store or transfer some or all of your personal data in countries outside of the UK. These are known as “third countries”. We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We will only store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy decisions and adequacy regulations, please refer to the [Information Commissioner’s Office](#).

Please contact us using the details below in Part 11 for further information about the particular data protection safeguards used by us transferring your personal data to a third country.]

Personal data security is essential to us, and to protect personal data, we take the following measures:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where we legally required to do so;

## 9. Do You Share My Personal Data?

We may share your personal data with other companies for the effective management of your account.

For instance we may sometimes contract with third parties to supply products and services to you on our behalf. These may include payment processing, delivery, and service providers. In some cases,

those third parties may require access to some or all of your personal data that we hold.

This includes international mobile networks, roaming partners and other technical service providers.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

We contract with third parties (as described above), and those third parties may be located outside of the European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). If any personal data is transferred to a third party outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 8.

In some circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

In the event of us sharing your data with third parties as described above, they are under contract with us not to contact you directly for marketing purposes or similar. They may have contact with you if required purely for the facilitation of your contract.

## 10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email address shown in Part 11.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 14 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 11. How Do I Contact You?

To contact us about your personal data and data protection, including to make a subject access request, please use the following details :

- Email address: info@datasim.com.
- Telephone number: 03700 11 90 10

## 12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes that we may make to our Privacy Policy in the future will be posted on our website. Where appropriate, we will notify you of the changes when you next visit our website.