

PRIVACY POLICY

INTRODUCTION

At To The Moon Mobile Ltd, we look after your Personal Data carefully. We adhere strictly to the requirements of the UK Data Protection Act 2018 (the “Act”) and the General Data Protection Regulation (“GDPR”)

This Privacy Policy (together with our general terms and conditions which may be found at <http://www.tothemoonmobile.com/privacy.pdf>) describes how we generate, collect, use, process and store the Personal Data that you provide to us or that is generated or collected when you use our online services and when you use our mobile telephone services.

This Privacy Policy only applies to this website (www.tothemoonmobile.com) and not any third-party sites that may be linked e.g. social media. This site is not intended for the use by anyone under the age of 13 nor does To The Moon Mobile Ltd knowingly collect or solicit personally identifiable information from anyone under the age of 13.

Under the GDPR (General Data Protection Regulation) To The Moon Mobile LTD control and/or process any personal information about you electronically using the lawful bases of a Performance of a contract.

The information we will normally collect about you will be:

- First Name
- Last Name
- Home Address
- Mobile telephone number
- Call data records including Traffic Data
- Top-up records
- Billing records

The main uses of your personal information are:

- Fulfilment of your order
- Processing of payment details
- Provision of support services
- To prevent and detect fraud or money laundering
- To check your identity; and
- To improve and develop our services

Data retention period:

7 years, or any other period as may be requested by Ofcom, or any organisation that takes over their roles requests or requires us to, for the period they specify;

Where we store your personal data:

OVH Hosting Ltd.,
Unit 12, The Courtyard Building, Carmanhall Road, Sandyford, Dublin 18
Registration number: 468585

Contact details of the data protection officer:

To The Moon Mobile LTD
DPO@tothemoonmobile.com

71-75 Shelton Street
London
WC2H 9JQ

Please take a moment to read our Privacy Policy so you know what choices you have about your Personal Data. This Privacy Policy may change occasionally so it's a good idea to come back and read through it again, from time to time as non-material changes to this policy will take immediate effect however material changes will take effect within 30 days.

For compliance questions in relation to this policy, we have appointed a data protection officer (DPO). If you have any questions about this privacy policy, please contact our data protection team at DPO@tothemoonmobile.com

You have the right to make a complaint at any time to the relevant data protection supervisory authority.

We would, however, appreciate the chance to deal with your concerns first before you approach the supervisory authority, so please do contact us in the first instance.

INFORMATION WE MAY COLLECT ABOUT YOU

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- First Name
- Last Name
- Home Address
- Mobile telephone number
- Call data records including Traffic Data
- Top-up records
- Billing records

If you contact our Customer Services Department, we may keep a record of that correspondence, including copies of e-mails and your e-mail address. We may also monitor or record any telephone calls made to our Customer Services Department for quality assurance.

Information that you provide on our website www.tothemoonmobile.com and Mobile App This includes information provided at the time of registering to use our website and/or Mobile App, subscribing to our products and services, posting material or requesting further products or services. We may also ask you for information when you report a problem with our website or our mobile telephone services and products.

Details of your visits to our website including, but not limited to, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

We may also ask you to complete surveys that we use for market research purposes, although you do not have to respond to them.

Other data, from time to time, to help us provide you with improved products and services. For example, now and again we might ask you to fill in a questionnaire, just so you can let us know how we're doing.

We may supplement the information that you provide to us with information that we receive from third parties, for example, collected from other members of your household.

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about a user's browsing actions and patterns and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our website and to deliver a better and more personalized service. Cookies enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customize our website according to your individual interests.
- To speed up your searches.
- To recognize you when you return to our website.

You may refuse to accept Cookies by activating the setting on your browser which allows you to refuse the setting of Cookies. However, if you select this setting you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse Cookies, our system will issue Cookies when you log on to our website.

Please note that our advertisers may also use Cookies, over which we have no control.

DATA STORAGE

Any information sent to us is encrypted (scrambled) using 256bit Secure Socket Layer (SSL) technology. This is industry standard encryption technology that protects your Personal Data whilst being sent over the internet from being intercepted and misused by third parties. When it reaches us, we then store it on a secure server based within European Economic Area so that it can only be read by authorized personnel. Although we make every effort to create a secure environment for your Personal Data, To The Moon Mobile Ltd cannot guarantee the safety of any personal information that you transmit to it online.

The Personal Data that we collect from you may be transferred to and stored in a destination outside the European Economic Area (EEA). It may be processed by staff that operate outside the EEA and who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of payment details and the provision of support services. For example, To The Moon Mobile uses call center and technical services from associated companies in Europe

Where the data protection laws of these countries do not provide the same level of data protection as in the UK, we will take steps to ensure that your Personal Data is protected in accordance with the requirements of UK law, including requiring appropriate security measures from the third party to protect your Personal Data. We will also monitor compliance with such security measures for the lifetime of our contractual relationship with the third party.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

USE OF PRIVATE DATA

Personal data will be processed on the legal basis that is legitimate business interest.

In line with statutory limitation we will keep your data for a period of 7 years in from the date of last contact following which records of personal data will be securely deleted.

We will use Personal Data held about you in the following ways:

- Supplying the Products and Services to you,
- The administration of your Account by the Customer Services Department,
- Providing you with service information, for example about Network faults,
- The prevention or detection of fraud,
- Market research and profiling your usage and purchase preferences, and
- Complying with applicable laws and regulations.

We may also use your Personal Data to contact you by telephone, e-mail or SMS to let you know about existing, new and enhanced products and services offered by us, including any special offers and promotions, which may interest you. If you do not wish to receive this information or be contacted in this way, you may at any time, free of any charge, opt out of this direct marketing by requesting to be put on a designated list. You may make this request by contacting the Customer Services Department or by sending an e-mail to **Unsubscribe@tothemoonmobile.com**

We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users.

We may disclose your personal information to third parties related to a prospective change of control or investment in To The Moon Mobile Ltd or if we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation or to protect the rights, property, or safety of To The Moon Mobile Ltd, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction in line with Requirement under Article 13 (1) (e) of GDPR and Section 93 (1) (d) of the DPA '18.

YOUR RIGHTS

You have the right to ask us not to process your Personal Data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to a marketing company. You can exercise your right to prevent this processing by checking certain boxes on the forms we use to collect your data at the time of collection or you can also exercise the right to opt out at any time by contacting the Customer Services Department at the address below. You can also have the right to request from the controller access to and rectification or erasure of personal data or rectification of processing concerning the data subject or to object to processing as well as the right to data portability – Requirement under Article 13 (2) (b) of GDPR

Our website may, from time to time, contain links to and from the websites of our associated companies. If you follow a link to any of these websites, please note that these websites follow their own Privacy Policy and we are not responsible or liable for these policies.

ACCESS TO INFORMATION

You have the right under the Data Protection Act 2018 to access the information which we hold about you. If you wish to exercise this right, please send your request to customerservices@tothemoonmobile.com You are welcome to ask us what information we have about you, any time you like. If you need us to send it to you, our Data protection officer shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee (Up to £10) based on administrative costs.' This fee covers the cost of our administration. If any of the details are incorrect, let us know and we'll amend them right away. If you'd like us to send you the information, you can contact our Customer Services Department, who will process your request and payment.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our Privacy Policy in the future will be posted on this page.

LINKS FROM OUR WEBSITE TO OTHER WEBSITES

Please be aware that our website provides access to other websites by linking to them. We are only responsible for the privacy, content or security of the To The Moon Mobile Ltd website.

CONTACTING US

If you have any comments or queries concerning our website, please contact us. For queries regarding our products or services, please call our Customer Services Department on 1213 from any To The Moon Mobile, or +44 (0) 2031730500 from any other network. You may also e-mail the Customer Services Department at Customerservices@tothemoonmobile.com or by completing the online enquiry form on our website.

If you have any questions or concerns about our use of your Personal Data you should write to To The Moon Mobile Ltd at the address below:

Customer Services Department
71-75 Shelton Street
London
WC2H 9JQ

Should you wish to make a complaint regarding your Personal data and the way that it is used by To The Moon Mobile Ltd please lodge a complaint with a supervisory authority, who within the UK is the UK's Information Commissioner's Office. The commissioners contact details can be found on the UK Information Commissioners Office website.