

# **PRIVACY POLICY**

## **INTRODUCTION**

At To The Moon Mobile Limited, we look after your personal data carefully.

This Privacy Policy (together with our Cookie Policy and general terms and conditions which may be found at <http://www.tothemoonmobile.com/>) describes how we collect, use, process and store the data that you provide to us or that is generated or collected when you use our online services (via our website or our App) or mobile telephone services. Please take a moment to read our Privacy Policy and any other privacy information we provide you when we are collecting or processing your data so you know what choices you have about your personal data. By “you” we mean the account holder who contracts with us, the person we communicate with or a visitor to our website.

It is important that the personal data we hold about you is accurate. Please keep us informed if your personal data changes.

This Privacy Policy does not apply to any third-party sites or applications that may be linked with our website ([www.tothemoonmobile.com](http://www.tothemoonmobile.com)) e.g. social media sites. Such third party sites will have their own privacy policies.

This site is not intended for the use by children nor does To The Moon Mobile Ltd knowingly collect or solicit personally identifiable information from children.

## **INFORMATION WE MAY COLLECT ABOUT YOU**

We may collect personal data about you, from you directly for example, when you provide information on the website or order or use our products or services, or from third parties for example, partners who help provide our products and services, or for example, from cookies when you use our website or App. We may collect information from you even if you're not yet a customer, for example, if you provide information via our website.

The main types of data we collect are:

- Identity data: name; title; date of birth; gender;
- Contact data: billing address; delivery address; email; mobile number;
- Services and Financial data: Bundle type and price; billing and top-up data;
- Usage data: Call Records (date, time, duration, calling & called telephone numbers, device identifier, cost of communication); website browsing information. We do not collect the content of your calls or messages.

- Marketing and Communications data: marketing preferences; queries/ complaints; interests, preferences; survey responses.
- Technical data: IP address; login data; time zone setting; location; browser information; operating system and platform details; system logs; other technology on the devices used to access the website.

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymized data). We may collect, share and use aggregated data for example, we may aggregate customers’ usage data to understand certain usage trends among the customer base. If we connect anonymized or aggregated data with your personal data so that it can identify you, we treat that combined data as personal data.

**HOW WE USE THE DATA WE COLLECT ABOUT YOU AND THE LEGAL BASIS FOR USING YOUR DATA**

We will only use your personal data for the purposes for which we collected it, or for other reasons which are compatible with the original purpose.

We need a legal basis to use your personal data. We use several legal bases:

- When you enter or are about to enter a contract with us for the provision of services to you, we will use your personal data to perform that contract for example, to process your order.
- We may rely on our “legitimate interests” to use your personal data for example, to administer our business or to market to you in certain circumstances that do not require your consent, such as when we direct market our products and services to you as our customer.
- Some uses of your personal data are required to comply with a legal obligation for example, tax or accounting requirements or co-operating with law enforcement agencies.
- We may need your consent for some uses of your personal data for example, to market to you in certain circumstances.

<b>Purpose/ Activity for which data is used</b>	<b>Examples of the type of data used</b>	<b>Legal basis for processing</b>
To process and deliver your order for products and services, including managing	Identity Contact Services and Financial	Performance of our contract Legitimate Interests

payment and registering you as a new customer	Marketing and Communications	
To manage your connection to the network and make our mobile services available to you, and billing you for such usage	Identity Contact Services and Financial Usage Technical	Performance of our contract Legitimate interests
To manage our relationship with you, including notifying changes to terms and conditions or privacy policy; keeping our records up-to-date; surveys; prize draws and competitions; communications between us including service messages; monitoring communications and calls to our customer contact service for training, compliance or operational purposes	Identity Contact Services and Financial Marketing and Communications Usage	Performance of our contract Legitimate interests (to understand and develop our customers' usage of our products and services) Necessary to comply with a legal obligation
To provide you with relevant marketing communications and website or App content about our products and services that may be of interest to you; and measuring the effectiveness of such marketing	Identity Contact Services and Financial Marketing and Communications Usage Technical	Consent Legitimate interests (to develop our marketing and business) (this may be without your specific consent in some situations, for example, where we market our products and services to you as our customer)

<p>Using your online browsing behavior and purchases and usage of our products and services to better understand you as a customer, to provide you with personalized content and marketing. We may share this information with third parties on an anonymized basis.</p>	<p>Identity Services and Financial Marketing and Communications Usage Technical</p>	<p>Legitimate interests (to develop our marketing and business)  (this may be without your specific consent in some situations, for example, where we market our products and services to you as our customer)</p>
<p>To analyze current use of our products and services, to research and develop improved products and services and information technology systems, to better meet customer needs</p>	<p>Identity Services and Financial Marketing and Communications Usage Technical</p>	<p>Legitimate interests (to develop our business to meet customer needs)</p>
<p>To administer our business:</p>		
<p>- Operating, maintaining and testing our network and IT systems; managing traffic; maintaining security of network and services</p>	<p>Identity Contact Technical</p>	<p>Legitimate interests</p>
<p>- Efficient and proper operation of our business, including preventing and detecting fraud, debt recovery, complying with tax, accounting and legal or regulatory requirements and co-operating with law</p>	<p>Identity Contact Services and Financial Marketing and Communications Usage Technical</p>	<p>Legitimate interests  Necessary to comply with a legal obligation</p>

enforcement or regulatory bodies		
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**WHO WE SHARE YOUR DATA WITH**

We may share your personal data with:

- Our group companies;
- Partners acting as data processors who help us provide our services to you, or to supply their services to you, for example, our customer contact centre provider; and survey companies who help us run customer surveys; Payment processing agents;
- Credit reference, debt recovery or fraud agencies;
- Law enforcement agencies or other public or regulatory bodies where required by law, or to protect our or third party’s rights, business or assets;
- Our host mobile network operator, for example, to provide to the emergency services including your location information;
- A prospective buyer of our business or their advisers, but only under strict conditions of confidentiality. If a change like this happens to To The Moon Mobile Limited, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

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

When we share your personal data with a third party, we control their use of the data through strict controls contained in a contract. For example, we require the third party to adhere to security controls and legal requirements regarding your data. We do not allow the third party to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions and the law.

The personal data that we collect from you may be transferred to and stored in a destination outside the European Economic Area (EEA) i.e. the European Union plus Switzerland, Iceland, Norway and Lichtenstein. It may be processed by staff that operate outside the EEA and who work for a group or associated company 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 contact centre and technical services from associated companies based outside the EEA.

Where the data protection laws of these countries are not deemed “adequate” by the European Commission we will ensure that your personal data is protected in accordance with the requirements of

UK law and this Privacy Policy. Typically, we do this by using specific contracts approved by the European Commission which give your data the same protection it has in the EEA, requiring appropriate security measures from the third party to protect your data and monitoring compliance with such security measures for the lifetime of our contractual relationship with the third party. We may alternatively utilize one of the other permitted methods of transferring personal data overseas.

## **HOW WE PROTECT YOUR DATA**

We use industry-standard technologies and processes to:

- check your identity when you contact us, but remember you are responsible for keeping your personal and account information secure and not sharing it including passwords;
- protect your personal data from unauthorised access and accidental loss, disclosure or destruction, while in storage or transit. For example we use data encryption. However, we cannot guarantee the security of your personal data that you transfer to us over the internet.
- limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. Where appropriate they will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Please remember that third party websites are outside of our control and operate in line with their own privacy policies. Your personal data entered in such websites or your communications sent over the internet may therefore be at risk of unauthorized access or use.

## **HOW LONG WE HOLD ONTO YOUR DATA**

We will hold personal data for a specific period of time for as long as reasonably necessary to fulfil the purpose we collected it for and in line with any legal obligations. We won't hold your personal data longer than we need it. Then we'll delete or anonymize it.

For example:

- We will hold Identity and Contact data about you while you remain a customer and for up to seven years after so we can verify your identity;
- We are obliged to hold Call Records for 12 months in case it is required by law enforcement agencies;
- We will hold copies of your bills and financial transactions for up to seven years;
- If a dispute arises, we may hold your personal data while the dispute is on-going.

In some circumstances you can ask us to delete your personal data: see the section headed, Your rights concerning the data we hold about you, below, for further information.

As set out above, in some circumstances we will anonymize your personal data (so that it can no longer be associated with you) for example, for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **YOUR RIGHTS CONCERNING THE DATA WE HOLD ABOUT YOU**

### **Your rights concerning marketing of products and services to you**

You may receive marketing communications from us if you have submitted information on our website or App or purchased products or services from us and you have not opted out of receiving that marketing. We may contact you by telephone, e-mail or SMS to let you know about existing or new and enhanced products and services offered by us, including any special offers and promotions, which may interest you.

We won't send you marketing messages if you ask us not to. If you've given your consent, you can withdraw this at any time, or if we're reliant on our legitimate interests for sending you marketing you can object. You can register your marketing preferences in our mobile App; or by sending an email to us at [unsubscribe@tothemoonmobile.com](mailto:unsubscribe@tothemoonmobile.com); or by contacting us in another way (see the section headed, "Contacting Us", below); or by unsubscribing on marketing emails or SMS we send you. We will add your name to a suppression list. You will still receive service messages.

We won't give your details to third parties for them to market their products or services, or use your data ourselves to market third party products or services, unless you give us your consent.

We may use other information available to us in order to tailor our communications for example, your online behaviour. We may share this information with third party advertising partners (but only on an anonymized basis). This means you may see our adverts on other companies' websites and other companies' adverts on our website.

Cookies: you may choose to refuse to accept non-essential Cookies. For more information about cookies, please see our Cookie Policy at <https://www.tothemoonmobile.com/cookies.pdf>

### **Your rights concerning the data we hold about you**

You also have the following rights concerning your personal data.

1. The right to be informed. You have the right to clear, easily understandable, accessible information about our use of your personal data and your rights. This is set out in this Privacy Policy and any relevant privacy information given to you when we collect or process your personal data
2. The right of access. You can ask us to send you the personal data we hold about you. Except in complex cases we'll endeavour to get this to you within one month, free-of-charge (although we may charge an administration fee for excessive, repetitive or unfounded requests). We'll keep you updated. We may ask you for proof of identity, such as a utility bill or driver's licence.
3. The right to rectification. You can request we change personal data about you that we hold where it is inaccurate or out of date. We may need to verify the accuracy of the new data you provide to us.

4. The right to erasure. In some situations, you can request we erase personal data we hold about you, for example, where there is no longer a compelling legal basis for us to hold it. We may be entitled to refuse such request in some situations.

5. The right to restrict processing. In some situations, you can request we restrict our use of your personal data except on limited bases, for example:

- If you want us to establish the data's accuracy,
- Where our use of the data is unlawful but you do not want us to erase it,
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims, or
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

We can still store your data. We may be entitled to refuse such request in some situations.

6. The right to data portability. In some situations, you can request we pass your personal data to an organisation selected by you, free-of-charge and in a suitable electronic format. For example, if you move to a new operator.

7. The right to object to processing. You can request we stop using your personal data for certain purposes, such as, direct marketing to you or profiling you for direct marketing purposes. You may be able to request we stop using your data in some other situations, such as where we rely on the "legitimate interests" basis for using your data, but we may be entitled to refuse such request in such situations, for example where there are compelling reasons for us to use your data.

8. The right not to be subject to automated decision making. If we make decisions using automated means, in some situations you can object to such decisions being made solely by automated means and request, for example, that we use human intervention in the decision making.

Please see the section headed, "Contacting Us", below, if you wish to exercise any of these rights.

## **CHANGES TO OUR PRIVACY POLICY**

This Privacy Policy may change from time to time. Any changes we make will be posted on this page. We will notify you of any significant changes, for example by SMS, email, recorded message or other appropriate means.

## **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 1200 from any To

The Moon Mobile, or +44 (0) 2031730500 from any other network. You may also e-mail the Customer Services Department at [customerservice@tothemoonmobile.com](mailto:customerservice@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 or about this Privacy Policy, please contact our data protection team at [DataProtection@tothemoonmobile.com](mailto:DataProtection@tothemoonmobile.com)

You have the right to make a complaint at any time to the relevant data protection supervisory authority which within the UK is the Information Commissioner's Office. The Commissioner's contact details can be found on the Information Commissioner's Office website ([www.ico.org.uk](http://www.ico.org.uk)).

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