

## **Mobinex**

Privacy Policy

Last updated: January 2023

This policy (together with other document referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed, shared and used by us, and how you can exercise your privacy rights. Please read the following carefully to understand our views and practices regarding your personal data.

This policy applies to personal information collected by Mobinex LTD, a company incorporated in England & Wales (registered no. 14155596) and whose registered office is at 3 Station Place, London, England N4 2DH. In this document “Mobinex”, “we”, “our” or “us” means Mobinex Limited, and “you” or “your” means you, our customer.

### **What does Mobinex do?**

Mobinex is a telecommunications operator providing a variety of products such as calls, SMS and data to consumers using our mobile number resources or through portability.

For more information about Mobinex, please see the “About Us” section of our Website - [www.mobinex.uk](http://www.mobinex.uk).

### **How we collect your information and why the Information you provide is collected voluntarily**

We collect your personal information when you register with us to receive the Services, use the Services, use our website under the domain name [www.mobinex.uk](http://www.mobinex.uk) (the “Website”), or request information or assistance from us.

The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

Should you register to receive the Services, you will be asked to provide certain personal information. This may include your name, address, email, age, certain financial information (including your bank account or bank card details and information that may affect your eligibility for credit), and other personal details that might be useful to us when considering which of our products and services might suit you. We might also request information that is relevant to our wider business, including your gender, interests, preferences and opinions.

### **Information that we obtain from third party sources**

We may collect your personal information from third party sources, but only where we have checked that these third parties either have your consent, are otherwise legally permitted or required to disclose your personal information to us.

We will collect information from Mobinex’s network services provider (including usage and billing data), their suppliers and roaming partners, your previous service provider, credit reference agencies, or other companies in the group which Mobinex belongs. We use this information in order to provide the Services to you.

We may also collect information about you that is publicly available from public sources such as business directories.

## **Information that we collect automatically**

When you visit our Website, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

When you use the Website, we collect information about your activity by using cookies and similar tracking technologies. Cookies are small amounts of information which we store on your computer. Cookies make it easier for you to log on to and use the Website during future visits. They also allow us to monitor Website traffic and to personalize the content of the Website for you. You may set up your computer to reject cookies by modifying the settings in your browser although, in that case, you may not be able to use certain features on our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log onto our Website. Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors. We use the following Cookies:

utm – these come from Google Analytics tools that record pages visited on our site. We use 7 of these, (utma, utmb, utmc, utmx, utmxx, utmz, utmx\_k) that show when, where and how you access our site.

PhpSESSID – generated by the software we use to publish the website; it retains data in forms so we can make using our site easier for you

partner – we use this cookie so you can automatically take advantage of offers from partner organizations.

Voucher\_code – We use this so you can automatically take advantage of offer vouchers you have selected.

Invite\_code – We use this so you can automatically take advantage of invites you have selected.

When you use Mobinex's Services we collect information about your activities, including the time, location and duration of any texts, calls or data usage and the phone numbers and other data relating to the numbers that you contact or contact you through the Services.

We may record calls to us for quality and training purposes.

## **Use of your information**

Your information will enable us to supply Services to you and to give you access to all parts of the Website. It will enable us to manage our business and our relationship with you, including by verifying your identity, administering the Services including billing, contacting you where necessary concerning your use of the Services and the Website, and handling any complaints or queries you may have. We will also use and analyze the information we collect so that we can administer, support, improve and develop our business and the Services.

We may use your information to contact you for your views on the Services, to notify you occasionally about important changes or developments to the Services or the Website, or to tell you about new products or services supplied by Mobinex or third parties that we think may be of interest to you. If you would rather not receive future marketing e-mails from us please let us know by emailing us at [t.otarashvili@mobinex.uk](mailto:t.otarashvili@mobinex.uk).

## **Disclosure of your information**

The information you provide to us will be held on our systems and may be accessed by or transferred to any entity in our corporate group, including any entity that acquires us or that we may acquire. This may include staff working outside the UK and third parties some of whom are located outside the European Economic Area. Such third parties process information, fulfil orders and provide support services on our behalf.

We may also transfer or disclose your personal information to our service providers, professional advisers and to such other parties as we consider necessary for the administration of the Services, the Website and related business.

Countries outside the European Economic Area do not always have strong as data protection laws and so we limit when we transfer data to them. If we do transfer data, we will always take steps to ensure that your information is used by third parties in accordance with this policy and that we comply with applicable legal requirements to ensure adequate protection for your information. When we collect your personal information we may process it in any other countries. When transferring personal data, we do so using contractual clauses or through other mechanisms that adequately ensure that your data protection rights are upheld.

Sometimes the law requires us to disclose your information. We will respond to request where our compliance is required by law or, we receive a request from a public authority or law enforcement agency, there is a threat to the safety of you or any other person or we suspect you of committing fraud.

We may transfer your personal data as a part of a corporate reorganization, business sale, or other merger activity, but in those circumstances any recipient will be obliged by law to comply with this policy.

We will only otherwise disclose any of the information you provide to us when permitted to do so by applicable law or with your consent.

#### Legal basis for processing personal information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we need the personal information to perform a contract with you, where we have your consent to do so, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person (for example, if we are asked to provide your telephone number or location data to the emergency services in an emergency situation).

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you use the Services our legal grounds for processing your personal information are summarized below:

Legal basis for processing	Purposes of processing
Contract	Providing you with communications services (including voice calls, SMS and data services) Providing internet access Customer helplines Complaints handling Set up and otherwise administer your account(s) for Services and products which we provide to you, this may include linking different Services which you receive from us Contact you in connection with the Services and your account (including through the use of electronic communication, e-mail, SMS or telephone)
Legitimate interests	Marketing of our products and services – you have the right to object. Credit checking and assistance with credit applications that may be made by you or other members of your household you are connected to financially Informing credit reference agencies about unpaid charges and debt, which information will be recorded and may impact your ability to obtain credit in the future Tracing and recovering debts and assessing claims The detection and prevention of theft, fraud, money laundering Assist with statistical analysis to assess and improve our Services and systems Record calls made to our helpdesks and contact centers for staff training and improvements to our processes and services Verify your identity when you make enquiries by phone, email or letter
Legal obligation	Complying with privacy and telecommunications laws, including any requests by law enforcement authorities for access to your personal information Protecting our businesses and other customers from fraudulent activities Record calls made to our helpdesks and contact centers for legal and regulatory requirements and security purposes
Vital interests	Protecting your vital interests or those of another person

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us at [info@mobinex.uk](mailto:info@mobinex.uk)

## Security

We employ security measures to protect your information from access by unauthorized persons and against unlawful processing, accidental loss, destruction and damage. Protection of the registration details and any debit or credit card information you give to us is a major priority. We have implemented a security policy that guards against unauthorized access. Data on our secure pages is encrypted using SSL technology.

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.

All your private data will be encrypted at all times whilst in transit over the Internet. SSL is special software that automatically encrypts any data sent by you on our secure pages. Our server then reads the data using a private key. This means that your data, be it debit or credit card information or any other personal details, is turned into code that can only be decoded with the private key or password. All pages on the site that require you to enter personal or sensitive information are secure. Your browser will indicate that the page is secure by displaying a padlock or key in the status bar at the bottom of the window. If your browser is suitably configured, you will receive a warning message when you first access any secure page on the site. This is simply information to advise you that the site is protecting your data.

Unfortunately, the transmission of information via the internet is not completely secure. Although Mobinex will do its best to protect your personal data, it cannot guarantee the security of any personal data that you disclose online. You accept the inherent security implications of using the Internet and we will not be responsible for any breach of security unless we have been being in breach of applicable laws and then only to the limits set out in the terms and conditions for the Website.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers, affiliates and members of our corporate group. If you follow a link to any of these websites, please note that these websites have their own privacy policies/web site terms of use and we do not accept any responsibility or liability for these policies. Please check such policies before you submit any personal data to them.

## **Data Retention**

We will retain your information for as long as you continue to use the Services and for a period of 6 years (or as long as the law requires) after your account has closed. We may decide it is necessary to retain your information for the purpose of resolving disputes or payment issues, or because it is still useful to us to analyze your use of the Services.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **Access to information**

You are entitled to access, correct or update of your personal information, you can do so at any time by contacting us using the contact details provided under the "Contact" heading below.

In addition, in certain circumstances you can object to processing of your personal information, request deletion of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the "Contact" heading below.

You have the right to opt-out of marketing communications we send you at any time by using the contact details provided under the "Contact" heading below.

Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any

processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

## **Complaints**

You have the right to complain about our collection and use of your personal information. In the first instance you should contact our Data Protection Officer by emailing [t.otarashvili@mobinex.uk](mailto:t.otarashvili@mobinex.uk)

In the event that you are unhappy with the Data Protection Officer's response you may raise your concerns with the Information Commissioners Office.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

## **Changes to our privacy policy**

Any changes to our privacy policy in the future will be posted to the Website. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the "last updated" date displayed at the top of this Privacy Notice.

### Contact

All comments, queries and requests relating to our use of your information are welcomed, using the following details:

The Data Protection Officer  
Mobinex Limited  
3 Station Place, London, England N4 2DH  
Customer Services Hotline  
+44 203 034 0050

Email:

[t.otarashvili@mobinex.uk](mailto:t.otarashvili@mobinex.uk)