



**Elite**  
PRIVACY POLICY

UPDATED MAY 2018

## **ELITE MOBILE LIMITED**

### **PRIVACY POLICY**

#### **1. Introduction**

This privacy policy contains important information about who we are and how and why we collect, store, use and share your personal information. It also contains details about your rights in relation to your personal information and how to contact us and the supervisory authorities in the event that you have a complaint.

This policy applies to our actual and prospective customers as well as users of our websites, applications and other online services ("the Sites").

#### **2. Who we are**

Elite Mobile Limited (Company No. 02987598) of First Way, Wembley, HA9 0TU collects, uses and is responsible for certain personal information about you. We act as the data controller of your information, which means that we determine the purpose for which it is processed and how it is processed.

Throughout this privacy policy, references to "we", "us" and "our" are references to Elite Mobile Limited (and its group companies and their brands, where appropriate).

#### **3. What information will we collect?**

In the course of your dealings with us, whether as an actual or prospective customer or user of the Sites, we will collect some personal information from you including the following:

- Title, first name, middle names and last name
- Address (including delivery address)
- Telephone number
- Email address
- Registration/login details and passwords
- Order history
- CCTV footage (if you visit us)
- Debit/credit card details
- Bank details
- Paypal account information
- Credit rating (where we have acquired this from a credit reference agency)
- Marketing and communication preferences
- Communications with us (including in written and telephone communication and notes of visits)
- Images from your store if we have visited the store
- Cookies
- IP address
- Other information collected in relation to your use of our products, services and the Sites

We do not collect children's personal information and the services provided by us are not directed to individuals under the age of 18.

#### **4. How will we use your information?**

We will use your information for the following purposes:

- To verify your identity and validate you as a customer
- To carry out credit checks against you and/or your business
- To provide you with the services and products that you have requested, including to process orders and confirm receipt of them
- For billing and the processing of payments
- To provide you with the functionality offered on our Sites
- To operate our Rewards programme and monitor your use of it (where you are a member of the programme)
- For administration of your account with us and general customer service
- For general administrative and business purposes
- To send you essential service communications (please note that you cannot opt-out of these)
- To send you marketing communications (you can opt-out of these, as explained in more detail in section 9)
- To maintain service standards and quality e.g. by recording and monitoring calls for training purposes
- To prevent and detect fraudulent and criminal activity
- To comply with applicable laws, regulations, court orders and government and law enforcement agency requests
- To resolve queries, complaints and disputes
- To monitor your use of the Sites
- To provide you with personalised services and communications,[including targeted advertising from our Sites
- To identify the devices you use to access the Sites and link these devices to you

#### **5. Who will we share your information with?**

We may share your personal information with:

- Other members of our corporate group
- Third parties that you have consented to
- Our network partners, including EE, Vodafone, O2, Three, giffgaff, LycaMobile and Lebara
- Our service providers, including:
  - Credit reference and fraud prevention agencies
  - Insurance providers
  - Debt collection agencies
  - Law enforcement agencies, regulators courts and public authorities
  - Operational companies such as delivery companies/couriers
  - IT companies who support our Sites and other business systems
  - Direct marketing companies
  - Our professional advisors
  - Any prospective or actual purchaser/transferee of all or part of our business and assets (or their advisors)

We will not sell your personal information to third parties.

We currently use the following service providers to process your personal information as part of their contracts with us:

- Credit reference agencies: Creditsafe and Tokio Marine HCC
- Deliveries: Royal Mail, DPD, DHL, UPS and Transworld
- Freight companies: Hi-Speed and Interken
- IT services: Ensign Global LLC and Communication Crafts LLC
- Card payments: Worldpay, Paypal and Barclays Merchant Services

These companies may change and we will keep our privacy policy updated.

We may transfer your personal information outside of the United Kingdom and the European Economic Area, for example, we outsource some of our IT services to India. Such countries may have different standards for data protection, therefore we will ensure adequate safeguards are in place to protect your personal information in accordance with our legal obligations.

## **6. When can we use your information?**

We rely on the following lawful bases for processing your personal information:

- Contractual obligations – we may use your personal information when it is necessary for us to do so to perform our contractual obligations to you. For example, if you order an item from us for delivery, we will collect your address in order to deliver your item, and we may pass it on to a third party courier, if necessary.
- Legitimate interests – we may use your personal information for the purposes of our legitimate interests in a way which you might reasonably expect and which does not materially impact your rights and interests. For example, we may use your order history to make personalised offers and promotions available to you and for existing customers.
- Legal obligations – we may use your personal information to comply with legal obligations that we are subject to. For example, to comply with a request by HM Revenue & Customs.
- Vital interest – we may use your personal information for your own safety. For example, if there is an urgent safety or product issue that we need to contact you about.
- Consent – we may use your personal information when we have your consent to do so. For example, when you opt-in to receive email newsletters. When we rely on consent as the lawful basis for processing, you have the right to withdraw your consent. Please see section 9 for further details on how to withdraw your consent.

## **7. How long will we keep your information for?**

We will keep your personal information for as long as is necessary for our business purposes or for legal requirements. This may mean that we retain some information for 6 years from the end of your dealings with us.

If you are a member of our Rewards programme, we may suspend or deactivate your account if you do not log in to your Rewards account for a period of 12 months, but we will still retain your personal information as described above.

## **8. How do we protect your information?**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your personal information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected or actual data security breach where we are legally required to do so.

## **9. What rights do you have over your information?**

You have the following rights (free of charge in most cases) in relation to your personal information:

- Fair processing and transparency about how we use your information
- The right to access your information
- The right to insist that we correct any mistakes in the information that we hold
- The right to erase or delete your information in certain situations
- The right to receive a copy of the information you have provided us with, in certain circumstances
- The right at any time to object to direct marketing
- The right to object to decisions being taken about you by automated means which significantly affect or disadvantage you
- The right to object to continued processing of your information, in certain circumstances
- The right to restrict the way that we process your information, in certain circumstances

If you wish to exercise any of these rights, please email, call or write to us at:

**Elite Mobile Ltd**  
**First Way**  
**Wembley**  
**HA9 0TU**  
**Tel: 0208 799 8000**  
**Email: [issy.harash@elitemobile.com](mailto:issy.harash@elitemobile.com)**

When contacting us, please ensure that you:

- Provide us with enough information to identify you
- Provide us with proof of your identity and address
- Let us know the information that your request relates to

If you would like to unsubscribe from our email newsletter, you can also click “unsubscribe” at the bottom of the newsletter.

## **10. Cookies and IP addresses**

Cookies are small text files placed on your device which uniquely identify your device. Cookies cannot be used to run programs or deliver viruses to your device.

We may use cookies to collect and store information about how you interact with the Sites and other web-related products and services so that we can:

- Understand what you use and like about the Sites
- Understand what you do not use and do not like about the Sites
- Provide a more enjoyable, customised service and experience
- Develop and deliver better products and services tailored to the interests and needs of our customers

We may use a persistent cookie to record details such as your unique user identity and your registration details, as this helps us recognise you on subsequent visits to the Sites so that you do not have to re-enter your registration details each time you visit the Sites.

Most browser technology allows you to choose whether or not to accept cookies, you can usually set your browser to accept or refuse all cookies or to alert you each time that website tries to set a cookie.

Your IP address is a number that is used to identify your computer so that data (such as web pages that you request) can be sent to you. IP addresses are automatically gathered by our web server, along with other information including time, type of web browser being used, operating system and CPU speed.

#### **11. Changes to this privacy policy**

We may change this privacy policy from time to time and any changes will be posted on our Sites and, where appropriate, notified to you by email. Any changes will become effective immediately after posting. We recommend you review this policy periodically as continued use of our Sites will be deemed to be an acknowledgement and acceptance of any changes.

#### **12. Contact and complaints**

If you have a concern or complaint about our use of your personal information, please email, call or write to us at:

**Elite Mobile Ltd**  
**First Way**  
**Wembley**  
**HA9 0TU**  
**Tel: 0208 799 8000**  
**Email: [issy.harash@elitemobile.com](mailto:issy.harash@elitemobile.com)**

We hope that we can resolve any query or concern that you raise about our use of your information, but if we are unable to do so, or if you feel that your personal information has not been handled correctly, you have the right to make a complaint to the Information Commissioner's Office.

You can contact them by calling 0303 123 113 or visiting the website [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).