

PRIVACY POLICY

Introduction

Elite Mobile Limited (Elite) respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to when and why we collect personal information about people who visit our website (regardless of where you visit from), how we use it, the conditions under which we may disclose it to others, how we keep it secure and tell you about your privacy rights and how the law protects you. We may update this policy on occasion so please do check to ensure you are happy with any changes. By using our website, and by the provision of information to us you will constitute acknowledgment of the terms of this privacy policy. Please do not send us any of your information if you do not want it to be used in the ways described in this privacy policy. Please also use the glossary to understand the meaning of some of the terms used in this privacy notice.

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1. Important information and who we are

This privacy notice aims to give you information on how Elite collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up purchase a product or service. It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Elite Mobile Limited is the data controller and responsible for any personal information provided to us when you use our services (collectively referred to as "Elite", "we", "us" or "our" in this privacy notice). We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights (as specified in section 9 below), please contact the DPO using the details set out below.

Full name of legal entity: Elite Mobile Limited

Email address: gdpr@elitemobile.com

Postal address: Elite Mobile Limited First Way, Wembley, HA9 0TU

Telephone number: 020 8799 8000

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). You can contact them by calling 0303 123 113 or visiting the website www.ico.org.uk/concerns. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

We may change this privacy policy from time to time and any changes will be posted on the site 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 the site will be deemed to be an acknowledgement and acceptance of any changes.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that

person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you as follows:

- **Identity Data, includes:** Title, first name, middle names, title, last name or similar identifier, date of birth, username, gender.
- **Contact Data, includes:** Address (including delivery address), telephone number, email address.
- **Profile Data, includes:** your username and password, login data, purchases or orders made by you, preferences, feedback and survey responses.
- **Transaction Data, includes:** order history, details about payments to and from you and other details of products and services you have purchased from us.
- **Financial Data includes:** Debit/credit card details, bank details, Paypal account information, credit rating (where we have acquired this from a credit reference agency).
- **Technical Data, includes:** internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Marketing and communications Data, includes:** your preferences in receiving marketing from us and our third parties and your communication preferences, communications with us (including in written and telephone communication and notes of visits).
- **Usage Data, includes:** other information collected in relation to your use of our website, products, services and the sites

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. If you fail to provide personal data where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have, or are trying to enter into, with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact, Technical and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products and/or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - make a telephone call to us and leave a message or request a call back;
 - enter a competition, promotion or survey;
 - react to marketing posts on our social media forums (including but not limited to our Facebook, Twitter, Instagram pages); or
 - give us some feedback.
- Automated technologies or interactions. As you interact with our website and the emails we send to you, we may automatically collect Technical Data about your equipment, browsing

actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy at the bottom of this page for further details

- Third parties or publicly available sources. We may receive personal data about you from various third parties such as set: Technical Data, Profile Data, Usage Data, Marketing and Communication Data, and aggregated data from the following parties:
 - analytics providers such as Google (based both inside and outside the EU);
 - advertising networks;
 - search information providers;
 - third party providers of technical, payment and delivery services;
 - third party data brokers; and
 - from publicly available sources.

4. How we use your personal data

We will only use your personal data when the law allows us to. For the most part we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where we have your consent to do so.
- Purposes for which we will use your personal data:
- We have set out below, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.
- Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.
- We use your information to:
 - 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 below)
 - 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
- Marketing: We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:
 - Special offers and promotions from us: We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). Where it is in our legitimate interests to do so, we will send you marketing communications by way of email, SMS or post if you have: Where it is in our legitimate interests to do so, we will send you marketing communications by way of email, SMS or post if you have:
 - requested information from us; or
 - purchased goods or services from us; or
 - provided us with your details when you entered a competition; or
 - registered for a promotion; and in each case, you have not opted out of receiving that marketing.
 - Third-party marketing: We will get your express opt-in consent before we share your personal data with any company outside of Elite for marketing purposes.
 - Opting out: We provide easy ways to stop our marketing and you can opt-out at any time. Please note, you may continue to receive marketing for a short period while we deal with your opt-out request.

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by clicking “unsubscribe” at the bottom of the newsletter on any marketing message sent to you via email. Alternatively, you can contact us via customer services and we can manually unsubscribe you from our mailing/marketing lists.

We will not send you marketing messages if you tell us not to, but if you receive a service from us we will still need to send you occasional service-related messages. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see cookies policy.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our DPO.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with third parties for the purposes described herein.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers 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.

6. International transfers

We share your personal data within Elite and group companies. In order to provide you with our services and products, we may need to transfer your personal information to locations outside the European Economic Area (EEA).

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

8. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. We will continue communicating to you whilst you engage with our services and make purchases from 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.

In some circumstances you can ask us to delete your data: see Request erasure below for further information. If you wish to have your data deleted, or have any questions regarding our data retention, please contact our DPO. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

You have rights under data protection laws, under certain circumstances, in relation to your personal data, such as.

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact the DPO for a subject access rights.

10. Glossary

Aggregated data	means information gathered and expressed in a summary form for purposes such as statistical analysis, and so is not personal data for the purposes of data protection law.
Comply with a legal or regulatory obligation	means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that Elite is subject to.
Legitimate Interest	means the interest of Elite in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
Performance of Contract	means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
Personal information	means information that identifies you as an individual, or is capable of doing so.
Regulatory obligations	means our obligations to regulators such as Trading Standards and the Information Commissioner's Office.
Third parties	<ul style="list-style-type: none">• Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.• Service providers to whom we outsource services, for example, who provide IT and system administration, or who assist us with customer insight marketing analytics.• Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.• HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.• Details of any other third parties, for example, market researchers, fraud prevention agencies, price comparison sites, etc.