

# Privacy Policy

This privacy policy applies to website visitors and to customers who have signed up to our services from 14<sup>th</sup> March 2014. This privacy policy explains how Oasis Communication Services Ltd uses, shares and protects your personal information. It covers all the services provided to you by Oasis Communication Services Ltd. Please read this policy in conjunction with the terms and conditions of any particular service or services you are using. This privacy policy does not apply to third-party websites which our website links to or which advertise on our website. These third-party websites operate their own privacy policy which we encourage you to read.

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## 1. Who we are

We are Oasis Communication Services Ltd, and we operate two brands in the UK: Get Connected, upgrademymobile.net. Oasis Communication Services Ltd is the controller of your personal data and is registered as a data controller with the Information Commissioner's Office with registration number ZA046183 (<http://www.ico.gov.uk>).

## 2. Your personal information

Your personal information is any information that identifies you as an individual or is capable of doing so. We collect your personal information such as:

- your full name
- your gender
- your date of birth or age
- your delivery and/or your billing address including postcodes
- your telephone number
- your email
- your debit or credit card details
- your banking information
- information on add-on products and services purchased by you
- your preferences and interests both when you tell us what they are or when we deduce them from what we know about you
- your demographic information (which we may acquire from third parties)
- the channel you chose to purchase your device or sign up to our services
- how you use our products and services. This may include your traffic data such as the phone numbers that you call and send messages to (and the phone numbers that you receive calls and messages from) and the date, time, duration and cost of your communications including your phone location at the time these communications are made and the types of websites that you visit, your spend, your device details, your phone usage (including voice, messaging, web/ WAP use, application use), your purchasing habits, your

location, your searching and browsing history on our websites (including the date, time and duration of your internet session) and your preferences.

- your amount of data usage (MBs used)
- your internet protocol (IP) address which we collect when you visit our website; we will allocate an IP address to your device when you connect to the internet using our phone network and/or broadband services
- your device details
- your communications with us
- your account information such as your billing history, the services you use and anything else relating to your account
- any information to help you decide which of our products and services would suit you best  
If you give us information about another person, perhaps when they receive a service you are paying for, we expect you to be responsible for ensuring that they know we are keeping records about them and process their personal information in accordance with this privacy policy. If you or your business applies for our services, we will register and check your details and the details of persons with whom you have a financial link (and if you are a business that trades as a partnership those of your business partners) with credit reference agencies to help us make credit decisions about you. You must also be able to disclose information about anyone else with whom you have a financial link. Your details may be linked to records relating to one or more of those people. We will also check your details with fraud prevention agencies. If you give us false or inaccurate information which leads us to suspect fraud, we will record this and details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. We and other organisations may also access and use this information to prevent fraud and money laundering, for example, when:
  - checking details on application for credit and credit related or other facilities
  - managing credit and credit-related accounts or facilities
  - recovering debt
  - checking details on proposals and claims for all types of insurance
  - checking details of job applications and employeesThese agencies will also use the records for statistical analysis about credit, insurance and fraud. We and other organisations may access and use from other countries the information recorded by fraud prevention agencies. More details about the relevant fraud prevention agencies are available on request.

### **3. How we use your personal information**

We use your personal information for the following purposes:

- to make credit decisions about you
- to confirm that your orders have been received and to process them, to validate you as a registered customer when using our services and calling our customer services
- for providing the relevant products and services to you, for administration of your account with us and customer services, and for billing purposes
- to tell you about functionality changes to our website, changes to our services or changes to our terms and conditions, to remind you about your customer benefits, and to advise you regarding the use of our services
- to help us develop our offers, products and services and the layout of our website to ensure that our services are as useful and enjoyable as possible
- for our internal purposes such as management, research, analytics, corporate reporting, credit scoring and to improve business efficiencies
- to contact you to invite you to form part of our consumer panel or research groups about our products and services or third-party products and services
- for segmentation of our customer base, marketing of our products and services and to understand and keep you informed about what is the best package for you according to your use of our services
- to provide you with the best customer experience we can
- to ensure security for you and our staff, and help maintain service quality (calls to our customer services may be monitored and/or recorded for quality and training purposes)
- to check that your home or office or other location is covered by our network and to optimise your network coverage and our network

- to prevent and detect criminal activity, fraud and misuse of or damage to our services or networks and to prosecute those responsible, to defend our rights or property or to protect the rights and interests of our customers and users
- to comply with applicable laws, regulations, court orders, government and law enforcement agencies' requests, to operate our systems properly or to protect ourselves or our users and customers or to solve any customer disputes
- for the management of traffic, your personal information may also be used for tracing nuisance or malicious calls and for emergency services
- to send you newsletters. You can opt out of receiving our newsletters by email by clicking on the 'unsubscribe' link provided in the email
- to provide aggregated statistics about our sales, customers, traffic patterns to third parties, but these statistics will not include any information that is likely to identify you
- to carry out research and analysis and monitor customer use of our network and products and services on an anonymous or personalised basis to identify general consumer trends and to understand better our customers' behaviours and partner with other businesses to create new services and to develop interesting and relevant products and services for our customers, as well as personalise the products and services we offer you. We may use information about your location for research and analytics purposes but we will only retain this information in an anonymised form to ensure that you cannot be identified as an individual.
- to market and advertise our branded products and third party products and services that may be of interest to you including third party offers, promotions, advertisements, competitions or commercial communications by telephone (mobile and landline when available), post, fax, electronic messaging (including SMS and MMS), email or online or via any other interactive media. To do so, we may use the services of our trusted business partners. We may also use information about your location as a factor in deciding which mobile ads to serve to you
- to provide you with online personalised services and targeted advertising including through the use of cookies when you visit our websites

#### **4. Sharing and disclosing your personal information**

We may share your personal information with:

- our Group Companies and their agents and sub-contractors
- our service providers involved in providing the services to you including the provision, distribution, delivery and marketing of our products and services, advertising and mobile wallet services. These service providers have to follow our express instructions in respect of the use of your personal information and they must comply with appropriate security measures to protect your personal information.
- fraud prevention agencies
- debt collection agencies
- insurance providers if you have purchased an insurance policy through us
- law enforcement agencies, regulators, courts and public authorities
- emergency services
- our trusted business partners for research purposes, to identify and understand general consumer trends and to understand better our customers
- prospective or actual purchasers, sellers or partners and their advisers if we decide to sell, buy, merge or otherwise re-organise our business

#### **5. How long we keep your information for**

The periods for which we keep your information depend on the purpose for which your information was collected and the use to which it is put. We will not keep your personal information for longer than necessary for our business purposes or for legal requirements. Data relating to the destination, routing, timing or duration of a communication will be kept for at least a year to comply with our legal obligations. Some information will be held for a few years after you have closed your account with us, for instance if this is necessary to meet our legal

obligations, or is in accordance with industry practice. Information sent to credit reference agencies will be held for 6 years.

## **6. Your right of access to your personal information**

If you want, you can always access your personal information. Just make a written request to our Disclosures team at the address below clearly identifying yourself and the information you require. We may charge you £10 to cover the cost of processing your request and supplying your information to you. We will ask you to provide identification to ensure we do not disclose your information to the wrong people. If you tell us that we hold any inaccurate information about you we will correct it at no charge to you. Please write to: The Disclosures Team, Oasis Communication Services Limited, 19 Nevill St, Abergavenny, NP7 5AA

## **7. Cookies**

Information on you may be collected through the use of cookies, when you use our website and selected third-party websites which belong to advertising networks with whom we partner. A cookie is a small unique text file placed on your device when you visit a website which enables the website to identify your device whenever you visit that website. Cookies cannot be used to run programs or deliver viruses to your device. Cookies can only be read by a web server from the same domain (e.g. www.ee.co.uk) that saved the cookie on your device.

## **8. Security and protection of your personal information**

We do our best to protect your personal details and other information about your account because we want you to feel completely confident about using our services. We are constantly reviewing our processes and procedures to protect your personal information from unauthorised access and use, accidental loss and/or destruction. Sometimes we use other organisations to process your personal information on our behalf. We don't allow them to use this information for their own commercial purposes and they have to follow our strict instructions and comply with appropriate security measures. We store all your account details and other such information on secure servers, adhering strictly to all relevant UK legislation

## **10. Directory enquiries**

You can ask us to include your contact details including your name or trading name, address and mobile phone number in a directory which will make your details available through directory enquiry services. If you want your contact details including your mobile phone number to be included in a directory enquiry service, please contact our Customer Services team. We may provide services that enable our customers and the public to find out which of their friends are on the T-Mobile or the Orange network by searching mobile phone numbers.

## **11. Our promise**

We will:

- Value the personal information entrusted to us and make sure we respect that trust
- Attempt to further than just the letter of the law when it comes to handling personal information, and adopt good practice standards
- Consider and address the privacy risks first when we are planning to use or hold personal information in new ways, such as when introducing new systems
- Be open with individuals about how we use their information and who we give it to
- Make it easy for individuals to access and correct their personal information
- Keep personal information to the minimum necessary and delete it when we no longer need it
- Have effective safeguards in place to make sure personal information is kept securely and does not fall into the wrong hands
- Provide training to staff who handle personal information and treat it as a disciplinary matter if they misuse or don't look after personal information properly
- Put appropriate financial and human resources into looking after personal information to make sure we can live up to our promises
- Regularly check that we are living up to our promises and report on how we are doing

## **12. Changes to our privacy policy**

Any changes we make to our privacy policy in the future will be posted on our website and, where appropriate, notified to you by SMS or email, so that you are always kept informed of how we use, share and protect your personal information. By continuing to use our services you acknowledge and agree to those changes.