

**CHINA TELECOM PRIVACY NOTICE
MVNO Services**

- 1. The personal information we use**
- 2. How we use your personal information and the basis on which we use it**
- 3. Your rights over your personal information**
- 4. Automated decisions about you**
- 5. Information Sharing**
- 6. Information Security and Storage**
- 7. International Data Transfer**
- 8. Contact Us**
- 9. Changes to the Policy**

This privacy notice describes how China Telecom (Europe) Limited ('we', 'us') collects and processes personal information about you, how we use and protect this information, and your rights in relation to this information.

This privacy notice applies to all personal information we collect or process about you in relation to the mobile virtual network operator (MVNO) services we offer. Personal information is information, or a combination of pieces of information that could reasonably allow you to be identified.

For the purposes of data protection law, we are a controller in respect of your personal data. We are responsible for ensuring that we process your personal data in compliance with data protection law.

1. PERSONAL INFORMATION WE USE

We will collect personal information about you from a variety of sources, including information we collect from you directly, for example when you sign up to receive our services and when you contact us.

Note that we may be required by law to collect certain personal information about you, or as a consequence of any contractual relationship we have with you. Failure to provide this information may prevent or delay the fulfilment of these obligations. We will inform you at the time your information is collected whether certain data is compulsory and the consequences of the failure to provide such data.

The categories of information that we collect directly from you, or that we generate through providing services to you, are:

- (a) your name
- (b) your contact details (e.g. email address, postal address and mobile number)
- (c) information we collect automatically from you by using cookies and other device identifying technologies ('Cookies and Tracking Technologies'). Further information about our use of Cookies and Tracking Technologies is available in our [Cookies Policy].

- (d) your preferences for particular products or services when you tell us what they are
- (e) your contact with us – such as a note or recording of a call you make to one of our contact centres, an email or letter you send to us or other records of any contact you have with us
- (f) details of the calls you make when you use the services, such as the date, time and duration of calls
- (g) the content of text messages or other types of communications when you use the services
- (h) your account information such as dates of payment owed, the subscription services you use or any other information related to your account

Special categories of personal data

We do not normally process any special categories of personal data (i.e. data concerning race, ethnic origin, politics, religion, trade union membership, genetics, biometrics (where used for ID purposes), health, sex life or sexual orientation) unless you voluntarily supply us with such data. If you supply us with any special category data, we will process such data in accordance with the law and only for the specific purpose for which you have supplied it (for example, if you tell us that you have a disability which means we need to make adjustments to the way in which we communicate with you).

2. HOW WE USE YOUR PERSONAL INFORMATION AND THE BASIS ON WHICH WE USE IT

We use your personal information to:

- (a) provide and personalise our services, for example to understand how you use our MVNO network, so that we may develop more interesting and relevant services as well as personalising the products we offer you
- (b) deal with your enquiries and requests
- (c) comply with legal obligations to which we are subject and cooperate with regulators and law enforcement bodies
- (d) prevent and detect fraud or recover debts
- (e) contact you with marketing and offers relating to products and services offered by us and/or the members of the China Telecom group (unless you have opted out of marketing, or we are otherwise prevented by law from doing so)
- (f) personalise the marketing messages we send you to make them more relevant and interesting
- (g) protect the MVNO network and manage the volume of calls, texts and other use of the MVNO network. For example we identify peak periods of use so we can try and ensure that the MVNO network can handle the volume at those times
- (h) carry out research and statistical analysis including to monitor how customers use our MVNO network, products and services

- (i) where necessary, establish, exercise or defend our legal rights or for the purpose of legal proceedings

We must have a legal basis to process your personal information. In most cases the legal basis will be one of the following:

- (a) to fulfil our contractual obligations to you, for example to provide the MVNO services, to ensure that invoices are paid correctly, and to ensure you are able to access our MVNO services when required. Failure to provide this information may prevent or delay the fulfilment of these contractual obligations.
- (b) to comply with our legal obligations and enable the members of the China Telecom group to comply with their legal obligations (which may apply under the laws of other countries around the world), for example, obligations relating to financial reporting and court orders.
- (c) to meet our legitimate interests, for example to understand how you use our services, to enable us to recover debt, and to enable us to derive knowledge from that to enable us to develop new services. When we process personal information to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms. For more information about the balancing test that we carry out to process your information to meet our legitimate interests, please contact us at the details below.

We may obtain your consent to collect and use certain types of personal information when we are required to do so by law. If we ask for your consent to process your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this privacy notice. For avoidance of doubt, if we do not just rely on consent to process your personal information, we may keep processing your personal information after your withdrawal of consent.

3. YOUR RIGHTS OVER YOUR PERSONAL INFORMATION

You have certain rights regarding your personal information, subject to local law. These include the following rights to:

- the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you
- the right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so
- in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us
- the right to request that we rectify your personal data if it is inaccurate or incomplete
- the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data, but we are legally entitled to retain it

- the right to object to, and the right to request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data and / or to refuse that request
- the right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us

If you would like to discuss or exercise such rights, please contact us at the details below.

We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate.

We will contact you if we need additional information from you in order to honour your requests.

4. AUTOMATED DECISIONS ABOUT YOU

The way we analyse personal information for the purposes of providing better and further services to you may involve profiling, which means that we may process your personal information using software that is able to evaluate your personal aspects and predict certain risks and outcomes. We may also use profiling, or otherwise employ solely automated means, to make decisions about you that relate to your use of the services. This is known as “automated decision-making” and is only permitted when we have a legal basis for this type of decision-making.

We may make automated decisions about you:

- Where such decisions are necessary for entering into a contract. For example, we may decide not to offer our services to you, or we may decide on the types of services that are suitable for you, or how much to charge you for our products based on your credit history and other financial information we have collected about you
- Where such decisions are required or authorised by law, for example for fraud prevention purposes
- Where you give your consent to us carrying out automated decision-making.

Subject to local legal requirements and limitations, you can contact us to request further information about automated decision-making, object to our use of automated decision-making, or request an automated decision to be reviewed by a human being.

We also make automated decisions about you based on your personal information

to select personalized offers, discounts or recommendations to send you based on your shopping history, browsing history, etc.

These types of decisions will not have a significant impact upon you, but you can still contact us for further information.

5. INFORMATION SHARING

We may share your personal information with third parties under the following circumstances:

- Service providers and business partners. We may share your personal information with our service providers and business partners that perform data management, network and marketing services and other business operations for us. For example, we may partner with other companies to process secure payments, fulfil orders, optimize our services, send newsletters and marketing emails, support email and messaging services and analyse information.
- China Telecom group companies. We work closely with other businesses and companies that fall under the China Telecom Global group. We may share certain information about the services you use, your location, and your contact information for marketing, administrative and internal reporting purposes.
- Law enforcement agency, court, regulator, government authority or other third party. We may share your personal information with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party.
- Asset purchasers. We may share your personal information with any third party that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this privacy notice.

Because we operate as part of a global business, the recipients referred to above may be located outside the jurisdiction in which you are located (or in which we provide the services). See the section on “International Data Transfer” below for more information.

6. INFORMATION SECURITY AND STORAGE

We implement technical and organisational measures to ensure a level of security appropriate to the risk to the personal information we process. These measures are aimed at ensuring the on-going integrity and confidentiality of personal information. We evaluate these measures on a regular basis to ensure the security of the processing.

We will keep your personal information for as long as we have a relationship with you. Once our relationship with you has come to an end, we will retain your personal information for a period of time that enables us to:

- Maintain business records for analysis and/or audit purposes
- Comply with record retention requirements under the law
- Defend or bring any existing or potential legal claims
- Deal with any complaints regarding the services

We will delete your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the data.

7. INTERNATIONAL DATA TRANSFER

Your personal information may be transferred to, stored, and processed in China and other countries that are not regarded as ensuring an adequate level of protection for personal information under United Kingdom law.

We have put in place appropriate safeguards (such as contractual clauses approved by the Information Commissioner's Office and appropriate supplementary measures) in accordance with applicable legal requirements to ensure that your data is adequately protected or rely on other grounds permitted by applicable law to effect such transfers. For more information on the appropriate safeguards in place, please contact us at the details below.

CONTACT US

If you have questions or concerns regarding the way in which your personal information has been used, please contact us at dataprotection@chinatelecomglobal.com.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the Information Commissioner's Office using their website.

8. CHANGES TO THE POLICY

You may request a copy of this privacy notice from us using the contact details set out above. We may modify or update this privacy notice from time to time.

If we change this privacy notice, we will post a notice on our website or otherwise notify you of the changes. Where changes to this privacy notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise your rights (e.g. to object to the processing).

9. ONE SIM MULTI-NUMBERS SERVICE

For the purpose of providing our services, contacting you and improving service quality, you agree that we collect, store and use your personal information including identity information, service data and log file. The identity information included but not limited to your name, date of birth, ID number, photo, residential address, mobile number, email address which are collected via identification devices, visualizers, paper forms, internet, etc. The service data and log file includes but not limited to location data, terminals information, call log, usage log, order information and bill which are uploaded and generated when you use our service. If you do not agree to provide or allow us to collect, store and use the aforesaid any or any part of the information, you may not become our customer or may not be able to use part of our services or certain services may not comply its description. Once our relationship with you is terminated or withdrawal, we will not collect any additional personal information from you and will deal with your personal information in accordance with applicable laws and regulations.

To apply for One SIM Multi-Numbers Service, you undertake that no more than five (5) CTEExcel SIM cards registered under your name can be apply for this service. If you already hold five or more than five CTEExcel SIM cards with the One SIM Multi-Numbers Service registered under your name, we may not be able to provide you with any new One SIM Multi-Numbers Service.