



## Privacy Notice

### Introduction

The purpose of this privacy notice is to inform you about what kinds of information we, at Dynamic Mobile Billing (DMB), may gather about you, how we may use that information, whether we disclose it to anyone, and the choices you have regarding our use of the information. This notice does not apply to the practices of companies that DMB does not own or control, or to people that DMB does not employ or manage. This includes any companies from whom you may have ordered services or products using the DMB service ("Merchants"), and any companies from whom you may be purchasing/using telecommunications services.

### Who We Are

Dynamic Mobile Billing (DMB), is a part of the Oxygen8 Group. DMB is incorporated and registered in England and Wales and whose registered office is at: Dynamic Mobile Billing, 12th Floor Lyndon House, 58-62 Hagley Road, Birmingham, B16 8PE, United Kingdom. If you have any questions or would like to make a request to exercise any of your legal rights, please contact our Data Protection Team using the contact information set out in the "Contact & Complaints" section below.

### Information Collection

DMB will collect information from in the course of the following activities:

1. When you participate in any DMB service and we process your transactions (whether via your mobile phone or the internet, or other media) we will use the personal information you have provided (including but not limited to your mobile phone number and/or your email address or postal address, network information or computer data) to provide you with the service; and promotions or further information regarding our products and services should you indicate your consent in the marketing preferences;
2. When you correspond with DMB for example, by subscribing to our newsletter or to apply for work with us, we will use your contact information to keep you up to date with information regarding our company and work opportunities;
3. When you contact Customer Support through our web site or by telephoning the support number, we may ask you for personally identifiable information regarding your inquiry, such as your name, email address, telephone number, purchases or telephone records;
4. When you visit the DMB website we automatically collect information about your visit to help us ensure that each visitor to our website can use and navigate the site effectively. This information may include the internet protocol (IP) address used to connect your device to the internet, uniform resource locators (URLs) clickstream to,

through and from our site, browser type and version, browser plug-in types and versions, operating system and platform.

Please note we do not collect information about the following:

We do not collect any "Special Categories of Personal Data" about you (e.g. ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership or biometric data).

Nor do we collect information about criminal convictions and offences. We do not collect data regarding children and our Services are not aimed at or intended for the use of anyone below the age of 18 years old.

## **Information Use**

Under the General Data Protection Regulations DMB is allowed to use your personal data only where there is a proper reason to do. Legally, DMB must have one or more reasons and these are:

- Contract – where your personal information is processed to fulfil a contractual obligation
- Consent – where you agree to DMB or the Merchant using your information this way
- Legitimate Interests – this means the interests of DMB in managing our business to allow us to provide you with the best services in the most secure and appropriate way e.g. transferring your data to third parties such as a Mobile Network Operator for text alert purposes
- Legal Obligation – where there is statutory or other legal requirements to share the information e.g. when DMB must provide your information for law enforcement purposes.

DMB collects and uses your personal information to give you high quality customer service, to provide you with convenient access to our products and services, and to make you aware of the latest offerings from DMB. To the extent permitted by law, DMB may aggregate your personal information with other third party data to enhance demographic profiles or to achieve regulatory compliance.

When we process data on the lawful basis of legitimate interest, we apply the following test to determine whether it is appropriate:

- The purpose test – is there a legitimate interest behind the processing?
- Necessity test – is the processing necessary for that purpose?
- Balancing test – is the legitimate interest overridden, or not, by the individual's interests, rights or freedom?

Please find below a list of the types of personal data we process, the reason why we process that data and the lawful basis for that processing.

Type of data collected	Lawful basis for processing	DMB's purpose of collection
<p>Transactional Information (Name, mobile phone number, email address, services or products availed of using the DMB service)</p>	<p>Contractual performance</p>	<p>To process purchase transactions for products and services on behalf of our clients (Merchants), and any companies from whom you may be purchasing / using telecommunications services. To ensure any transaction issues can be dealt with.</p>
<p>Transactional Information (Cnt'd)</p>	<p>Statutory obligation</p> <p>Legitimate interest</p>	<p>For accounting and taxation purposes.</p> <p>Documentation should any Legitimate interest contractual legal claim arise.</p>
<p>Customer Account Details (Name, email address, mobile phone number)</p>	<p>Legal obligation/ Legitimate interests (depending on nature of services)</p> <p>Legitimate interest</p>	<p>Keeping our records up to date, providing you with efficient customer service and working out which of our products and services may interest you and telling you about them.</p> <p>To provide you with access to your billing / purchase history</p>
<p>Security (technical information such as IP address, operating system and platform, browser type, etc)</p>	<p>Legal Obligation / legitimate interests</p>	<p>To detect, investigate and report financial crime (e.g. Fraud) and to comply with any legal and regulatory obligations placed on us by regulators such as the PFI. Process efficiency in dealing with such activity, and to make service and process improvements.</p>
<p>Technical Information (IP address, operating system and platform, browser type, etc)</p>	<p>Legitimate interests</p>	<p>Developing products, services, applications and designs that attract and retain customers. Improving customer interaction with our sites.</p>

<p>Contact Information and Marketing Preferences (Name, email address, mobile number, etc)</p>	<p>Legitimate interests</p>	<p>To provide you with information about special offers, promotions, new products and services that might be of interest to you. Provide you with online advertising and updates in relation to the identified area of interest.</p> <p>To communicate with you about any issues or queries raised with Customer Services.</p>
--	-----------------------------	--

### Sharing of Your Personal Data

DMB may share your personal data including transaction data with its Merchants, our affiliates, agents and your mobile network operator ("Network"), law enforcement agencies or other third parties as necessary for the fulfilment of its service obligations (including matters in relation to the goods and services supplied by these parties) or for the purposes of legal compliance (including investigations, pursuant to court orders or analogous activities), the prevention of fraud or misuse, for the purposes of a corporate transaction or as may be otherwise permitted by law. The Merchants, affiliates and agents may be located outside of the European Economic Area. We contractually require Merchants to restrict the use of your personal information and maintain its confidentiality and Wherever transfers of data to third countries occurs DMB will put in place appropriate contractual provisions to ensure that there are strict rules regarding both the confidentiality and security of your information.

We limit access to your personally identifiable information to employees and Merchants and Networks who we believe need access in order to provide services to you or to do their jobs or as described in this notice. Merchants may use your personal information after you have made a purchase from them in order to promote their services and products. If you wish to opt-out of receiving such marketing or promotions, then please contact the relevant Merchant directly.

### Data Retention

There are a number of factors that influence the length of time your data will be retained for, including the purpose for which we use that information and DMB's obligations under other laws. DMB will retain your data for such a period of time as you remain a customer of DMB, such data is required to complete transactions (including securing future refunds), in order to resolve disputes or as is required to comply with our legal and regulatory obligations (whichever is the longer period).

The only exceptions to this are where:

- The law requires us retain your personal information for a longer period, or delete it sooner;

- You exercise your right to have your information erased (where it applies) and DMB does not need to retain it in connection with any of the reasons permitted or required under the law;
- DMB bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those legal proceedings have concluded and no further appeals are possible;

You are entitled to contact us if you require your data to be removed and no longer wish to receive services from DMB.

You are also entitled to request the following from DMB, these are called your Data Subject's Rights, and there is more information on these available from the Information Commissioner's website: <https://ico.org.uk/>.

- Right of access –to request access to your personal information and information about how we process it
- Right to rectification –to have your personal information corrected if it is inaccurate and to have incomplete personal information completed
- Right to erasure (also known as the Right to be Forgotten) – to have your personal information erased. Contact Customer Services on +44 (0) 333 313 7900
- Right to restriction of processing – to restrict processing of your personal information
- Right to data portability - to electronically move, copy or transfer your personal information in a standard form
- Right to object - to object to processing of your personal information
- Rights with regards to automated individual decision making, including profiling rights relating to automated decision making, including profiling

If you have any general questions about your rights or you wish to exercise your rights under the General Data Protection Regulations, please contact Customer Services on +44 (0) 333 313 7900 or email [gdpr@dynamicmobilebilling.com](mailto:gdpr@dynamicmobilebilling.com).

## **Security of Your Information**

We take appropriate technical, procedural and organisational measures to guard against unauthorised or unlawful access to, or processing of, your personal information and against accidental loss or destruction of, or damage to, your personal information. While no computer system is completely secure, we believe the measures implemented by our site and service meet industry standards and reduce the likelihood of security problems to a level appropriate to the type of data involved.

## Contact and Complaints

Please feel free to contact us if you have any questions, comments and requests. You can opt out or stop marketing communications from DMB by choosing one of the following options: call +44 (0) 333 3137900 or send email to [customercare.uk@dynamicmobilebilling.com](mailto:customercare.uk@dynamicmobilebilling.com).

DMB will never seek to extract confidential personal information from you by email (such as account details, passwords etc.). Please do not send confidential information by insecure means. If you receive any suspicious emails or communications that you suspect may be fraudulent please contact us by choosing one of the following options: call +44 (0) 333 313 7900 or send email to [customercare.uk@dynamicmobilebilling.com](mailto:customercare.uk@dynamicmobilebilling.com) .

Should you wish to contact us to discuss a complaint or any concerns about the processing of personal data, please contact our GDPR Team using the following email address: [gdpr@dynamicmobilebilling.com](mailto:gdpr@dynamicmobilebilling.com).

All complaints will be treated in a confidential manner. If you wish, you are also entitled to raise your concerns directly with the Information Commissioner's Office. For details on how to contact the ICO, please go to their website <https://ico.org.uk/make-a-complaint/> or call +44 (0) 303 123 1113.

## Changes to this Notice

The DMB Privacy Notice is subject to change at any time. Please review the privacy notice regularly for any changes.

Effective from May 2018.