

Online Privacy Policy

Your privacy when
using our website

V1.1

SMARTY
Simple, honest mobile

This policy covers our privacy practices in connection with our website; to let you know about the kinds of information we may obtain about you, how we may use that information, and who we might share it with. We're not responsible for the content or privacy practices of other websites.

Each time you use our website you agree to the following terms.

General Statement

Reference to "SMARTY" in this Privacy Policy means Hutchison 3G UK Limited.

We respect your right to privacy, and we're committed to complying with data protection and privacy laws. We'll only collect personal information about you with your permission. Any personal information you provide to us or we obtain about you, will be kept secure and confidential.

Collection and Use of Your Personal Information

You agree that any data you provide to us will be true, complete and accurate in all respects and you agree to notify us immediately of any changes to it. We'll only collect personal information which is necessary to:

- process any applications or registrations made by you;
- conduct fraud checks if you apply for an account. We will check your details with your payment card provider who will confirm your name and address matches the payment card you have provided to help us verify your identity and decide whether to accept your application or future applications.
- conduct fraud checks based on your IP address, browser type, use of Java and geo-location etc;
- administer your account(s), provide customer services and respond to and resolve any enquiries or complaints;
- provide any products, services or information requested by you;
- conduct analysis for traffic and billing management, and to support product development;
- contact you for market research purposes;
- keep you up-to-date by post, telephone, email, and direct to your handset by text, picture, video and audio message with information our services, offers and promotions. If you've given us permissions to share your data with our selected third parties, you may also receive offers and promotions. These marketing messages will be subject to any marketing preferences indicated by you. It's your choice and you're in control - you can update your preferences anytime by updating them in your online account.
- If you're 16 or under, you must get your parent or guardian's consent to provide your personal information to our website, otherwise you're not allowed to provide any of your personal information to us.

Retention of data

We'll keep your personal information for as long as necessary for the purposes for which it was collected, to provide you with services and to conduct our legitimate business interests or where otherwise required by law. If you use 'SMARTY Services', we may hold your Communications Data for 12 months for legitimate business purposes (or longer in connection with any legal proceedings or disputes).

Disclosure

Your personal information may also be processed by other organisations on our behalf for the purpose of processing applications, and providing information or services to you. The use of personal data for these purposes will remain under our control at all times.

We may disclose your information to other members of our group of companies, and to our or their partners, associates, agents or subcontractors and to possible successors to our business. Some of these parties may reside outside the European Economic Area (which currently comprises the Member states of the European Union plus Norway, Iceland and Liechtenstein). If we do this, your information will be treated to the same standards adopted in the UK.

We may also disclose your information for the prevention and detection of crime and to protect our interests and other users or if required to do so by law.

Collection and use of technical information

We use 'session' cookies which enable a visitor's web browser to 'remember' which pages on this website have already been visited. We may also map and analyse visitor usage patterns to help us develop the site and enhance a visitor's experience.

Depending on the type of browser you are using, you may be able to configure your browser so that:

- (i) you are prompted to accept or reject cookies on an individual basis or
- (ii) to prevent your browser from accepting any cookies at all. You should refer to the supplier or manufacturer of the web browser for specific details about cookie security.

We may collect and store certain 'technical information' about your visit to this site, such as:

- the IP address from which you access this website
- the type of browser and operating system used to visit this site
- the date and time of your visit(s) to this site
- clickstream data which reveals the activities of visitors around this website (for example the pages you access and products browsed)
- the website address of the website from which you accessed this site.

Such data are used only to analyse trends, administer and improve our website and the services we offer, track movement through our website and gather statistical information about visits to the website.

Notification of changes

If we change this Privacy Policy we will post the amended Policy on our website so that you are always aware of how we collect, use and disclose your personal information.

Access to your personal information. (Subject Access Request)

You have the right to obtain a copy of the personal data which we may hold about you. Please write to the

Data Protection and Privacy Officer
Hutchison 3G UK Ltd.
Star House
20 Grenfell Road
Maidenhead
SL6 1EH

Alternatively email: dpa@smarty.co.uk

We may ask you to provide proof of your identity and residence and may charge £10 to cover our administrative costs.

Monitoring of Your Communications

We may monitor and/or record communications between you and SMARTY for quality control and training purposes.

Other terms and conditions

You should read this Policy in conjunction with our website terms and conditions (which apply to your use of this website), our Terms of Sale/Supply of Products (which apply to the purchase of products by you via this website) and the Terms for SMARTY Services (which apply to your use of SMARTY Services). Our customer privacy statement concerning your use of SMARTY Services is contained within the 'Privacy Notice' found in Section 13 of our Terms for SMARTY Services.

Glossary of technical terms used

- Web browser - The software you use to read web pages such as Microsoft Internet Explorer, Netscape Navigator and Opera.
- IP address - The identifying details for your computer (or your internet company's computer), expressed in "internet protocol" code (for example 192.168.72.34). Every computer connected to the web has a unique IP address (which may be permanent or change each time you access the internet).
- Cookies - Small pieces of information, stored in simple text files, placed on your computer by a web site. Cookies can be read by the web site on your subsequent visits. The information stored in a cookie may relate to your browsing habits on the web page, or a unique identification number so that the web site can "remember" you on your return visit. Generally speaking, cookies do not contain personal information from which you can be identified, unless you have furnished such information to the web site.