

Privacy policy

Introduction

VCom respects your privacy and is committed to protecting your personal data. This privacy policy will inform you:

- About how we use your personal data through your use of this website, including any data you may provide us when you purchase a product or service from us, sign up to our communications or take part our competitions.
- About your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can choose the specific areas in which you are particularly interested.

About us

We, VCom Polska Sp. z o.o., operate in Poland. We provide electronic communication services including national and international calls, texts and data to customers. When we say, “we”, “us” or “our” in this policy, we are referring to the relevant VCom entity responsible for processing your data.

Personal Data is any information about you from which you can be identified. It does not include data where your identity has been removed (it’s called anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

What data do we collect about you?

- **Identity Data** includes your first name, last name, date of birth, language.
- **Contact Data** includes your email address, contact number, full address
- **Financial Data** includes your bank account and payment card details (where you choose to purchase products from us and make a payment directly to us, such as on our website).
- **Billing Data** includes your details about payments about the products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform you use to access our website.
- **Profile Data** includes your username and password, purchases made by you, your interests, and preferences.
- **Usage Data** includes information about how you use our website, products and services, top up records, call data records which includes traffic data and location data.

- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- **Customer Care Data** includes your feedback to us, survey responses and voice mail recordings when you contact us.

We also process your personal data to derive information so that we can make personalised offers to you. The derived information does not directly or indirectly reveal your identity. However, if we combine or connect the derived information with your personal data, it can directly or indirectly identify you. So, we treat the combined data as personal data which will be used in accordance with this privacy policy.

Where we need to collect personal data by law and you fail to provide that data when requested including updating data records or verifying the data, we may not be able to provide you with the products or services. We may also have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How do we collect your personal data?

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

Indirect interactions via our independent distributors, wholesalers and retailers.

Direct interactions. You may give us your personal data by filling in forms on our website or by corresponding with us by post, phone, email or otherwise.

Your personal data is collected when you do the following:

- Purchase our products or services;
- Create an account on our website;
- Subscribe to our services or communications;
- Request marketing to be sent to you;
- Enter a competition, promotion or survey; or
- Give us some feedback.
- Download our app.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies. Please see our Cookie Policy for further details.

How do we use your personal data?

We will only use your personal data when the law allows us to, most commonly, in the following circumstances:

- Where we need to perform the terms and conditions we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

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 basis depending on the specific purpose for which we are using your data.

- Purpose - To register you as a new customer
Type of data - (a) Identity, (b) Contact
Lawful basis for processing including basis of legitimate interest - Performance of terms and conditions with you and where applicable, as required by law
- Purpose - To supply products and services to you including: Managing payments
Collecting money owed to us
Type of data - (a) Identity, (b) Contact, (c) Financial, (d) Billing
Lawful basis for processing including basis of legitimate interest - (a) Performance of terms and conditions with you, (b) Necessary for our legitimate interests (to recover sums owed to us)
- Purpose -To manage our relationship with you and administer your account which will include:
 - Notifying you about changes to our terms and conditions or privacy policy
 - Detecting and preventing crime and fraud
 - Asking you to leave a review or take a survey
 - Manage any concerns that you raise to our customer care department
 - Quality assurance and monitoring purposesType of data - (a) Identity, (b) Contact, (c) Profile, (d) Marketing and Communications, (e) Customer Care, (f) Usage
Lawful basis for processing including basis of legitimate interest
 - (a) Performance of terms and conditions with you
 - (b) Necessary to comply with a legal obligation
 - (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
- Purpose -To enable you to participate in a competition or complete a survey (non-promotional)
Type of data - (a) Identity, (b) Contact, (c) Profile, (d) Usage, (e) Marketing and Communications
Lawful basis for processing including basis of legitimate interest
 - (a) Performance of terms and conditions with you,
 - (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
- Purpose -To market products and services to you to complete a survey (promotional)
Type of data - (a) Identity, (b) Contact, (c) Marketing and Communications, (d) Profile
Lawful basis for processing including basis of legitimate interest
 - (a) Legitimate interest to process marketing data (to grow our business) and consent for sending electronic marketing communications for new customers or reliance on existing customer relationship to send electronic marketing communications

- Purpose - To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.
Type of data - (a) Technical, (b) Usage
Lawful basis for processing including basis of legitimate interest, necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

- Purpose - To make suggestions and recommendations to you about goods or services that may be of interest to you

Type of data - (a) Identity, (b) Contact, (c) Technical, (d) Usage, (e) Profile

Lawful basis for processing including basis of legitimate interest

Necessary for our legitimate interests (to develop VCom products/services and grow our business)

Marketing You will receive marketing communications from us either if you have consented to receive them or you have purchased products or services from VCom, and in each case, you have not opted out of receiving that marketing.

You will also receive marketing communications from other VCom entities if you have consented to receive such communications on their VCom products or services.

How can you manage your marketing preferences?

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by Contacting our Customer Services Department. To contact Customer Services:

Dial +48 451 45 99 34 from your VCom number

Send an email to help@vcom.global

You can also Contact our Customer Services Department to let us know whether you're happy to hear from us by email, text, or phone call. 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 or other purposes.

To whom do we disclose your personal data?

We may have to share your personal data with the parties set out below for the purposes set out:

Other VCom affiliated entities under common control (hereinafter "VCom entities") who provide ancillary services such as call centre support for the fulfilment of your orders and clarification any of your queries.

Other VCom entities where you have chosen to receive marketing communications from them on other VCom products and services other than VCom.

External third parties who provide IT technical support services, datacenter services and call center support.

Regulators and judicial authorities who require reporting of processing activities in certain circumstances.

If a change happens to our business where we may choose to sell, transfer or merge parts of our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

Where applicable, we require all external 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.

Where is your data transferred to?

We are committed to ensuring the security and privacy of your personal data. All data collected and processed by our company is stored exclusively within the European Union (EU). We do not transfer your data to countries outside the EU.

By keeping your data within the EU, we ensure that it is protected under the strict data protection regulations set forth by the General Data Protection Regulation (GDPR). These regulations are designed to safeguard your rights and provide a high level of data security.

Should we ever need to transfer your data outside the EU in the future, we will ensure that the transfer complies with GDPR requirements, including the use of appropriate safeguards, such as standard contractual clauses or adequacy decisions. In such a case, we will inform you accordingly and obtain your consent where required.

How secure do we keep your personal data?

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 staff members or 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 strict duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable supervisory authority of a breach where we are legally required to do so.

How long do we retain your personal data for?

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 requirements.

Details of retention periods for different aspects of your personal data are available in our Data Retention Policy which you can request from us by Contacting our Customer Services Department.

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

What are your privacy rights?

Under certain circumstances, you have rights under data protection laws in relation to your personal data which are as follows:

- Access to your personal data – This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Correction of your personal data – This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Erasure of your personal data – This enables you to ask us to delete personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data – This right can be exercised where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Restriction of processing your personal data – This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Right to transfer your personal data -This enables you to ask us to transfer your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.

Note, however, that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- Transfer of your personal data -This enables you to ask us to transfer your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.

Note, however, that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

If you wish to exercise any of the rights set out above, please send your request to help@vcom.global

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

How to contact us?

You may contact our Customer Services Department at +48 451 45 99 34. You may also e-mail the Customer Services Department at help@vcom.global or by completing the online enquiry form at <https://vcom.global/support>.

For compliance questions in relation to this policy, we have appointed a data protection officer (DPO). So, if you have any questions about this privacy policy, please contact our data protection team at DPO@vcom.global. You have the right to make a complaint at any time to the relevant data protection supervisory authority. We would, however, appreciate the chance to deal with your concerns first before you approach the supervisory authority, so please do contact us in the first instance. Changes to the policy We have updated our privacy policy to reflect the changes in data protection laws.

SIM-card registration criteria.

To use the Services, you must first register and activate your SIM Card, and to ensure that the SIM Card is working properly, you must also make a call, send an SMS and/ or use the

data services in your Home Country (which is identified by the country code of your mobile number). Please ensure you have sufficient credit on your Account prior to use.