

Privacy Notice

This Privacy Notice is provided pursuant to art. 13 of Regulation (EU) 2016/679 (hereinafter "General Data Protection Regulation") by Bolttech (Ireland) Limited (referred to as "Bolttech", "we" or "us" in this document). We are a company incorporated in the Republic of Ireland (number 675680) and registered office is at 77 Sir John Rogerson's Quay, Dublin 2 in the context of the SIM Only 3Phone Swap Service ("the Service").

Bolttech undertakes to protect the privacy and confidentiality of the personal data it processes in the context of the services provided to its customers and, therefore, we inform you that the processing of your personal data will take place in compliance with the aforementioned legislation.

The Service is offered to all Three Ireland SIM Only customers who are residents in the Republic of Ireland and over 18 (eighteen) years old.

It is important that you read this privacy notice together with any other privacy notice or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This privacy notice supplements other notices and privacy policies and is not intended to override them. We may update, revise, vary, or amend this privacy notice, without notice to you, by posting the new policy on our website, so you should always check whether a new policy applies when you visit the site.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Purpose of Collection of Personal Data

In the course of using the Service, you may disclose or be asked to provide us personal information. In order to benefit from and enjoy the various services offered by the Service, it may be necessary for you to provide us with your personal information. Although you are not obliged to provide the information requested on the Service, if you do not provide such data, we may not be able to render certain services on the Service.

Our purposes for collection of information and data (including personal data) are primarily concerned with providing the service you have bought from us, including collecting payments from you, delivering a replacement phone to you when you have requested a Swap, and collecting the old phone from you. Other purposes for which we might process your information include but are not limited to the following:

- (A) with your optional consent, we will process your personal data for marketing purposes (direct sales, sending of advertising material, carrying out market research, commercial communication) and send you marketing communications by mail, email, SMS/MMS or WhatsApp relating to products/services offered by Bolttech or other companies of the Bolttech' group. If you do not consent to the processing of your personal data for marketing purposes, you will not suffer any prejudicial consequences whatsoever. In any case, you can freely withdraw your consent to the processing of your personal data for marketing purposes at any time, even selectively, requesting it in the manner indicated in section 8 below. In relation to promotional communications sent via e-mail, you can revoke your consent to the processing of your e-mail address for marketing purposes by clicking on the cancellation link (opt-out) in each promotional e-mail; and
- (B) with your optional consent, we will process your personal data for profiling

purposes, in order to be able to send you personalized promotional communications based on the products and services you purchased from us as well as on the other data that you have provided to us when benefiting from the Service (e.g. the smartphone chosen with the Swap option; how many times you have exercised the Swap option; etc.). If you do not consent to the processing of your personal data for profiling purposes, you will not suffer any prejudicial consequences whatsoever. In any case, you will be able to freely withdraw your consent to the processing of your personal data for profiling purposes at any time, requesting it in the manner indicated in section 8 below.

Contact details

If you have any questions about this privacy notice or our privacy practices, please contact our privacy@bolttech.eu

Should you consider that the processing of your personal data infringes the General Data Protection Regulation, you have the right to lodge a complaint with the Data Protection Commission (<https://dataprotection.ie>). We would, however, appreciate the chance to deal with your concerns before you approach the authority so please contact us in the first instance.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

1. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- *Contact and identity details*
 - *Name*
 - *Address*
 - *Date of Birth*
 - *Email address*
 - *Phone number*
- *Phone Details*
 - *IMEI*
- *Payment details*
 - *Card number*
 - *Card expiry date*
 - *Card Holder name*

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data

so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide those data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

2. How are your personal data collected?

We collect data from you when you register for the Service, and from time to time during the term of your contract with us including when you request a Swap. We also receive some data about you from your mobile service provider, Three. We collect no data about you from other sources.

3. How we use your personal data

We will only use your personal data when the law allows us to and most commonly, we will use your personal data where it is necessary for the performance of the contract you have with us.

We may also use the data for our legitimate interests provided that your interests and fundamental rights do not override those interests. We may also use the information where we need to comply with a legal obligation.

See Lawful Basis below to find out more about the types of lawful basis that we will rely on to process your personal data.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal basis 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 ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data, where more than one ground has been set out in the table below.

Purpose/Activity	Type of data [e.g. identity, contact, profile, technical, usage]	Lawful basis for processing including basis of legitimate interest
To enter into a contract with you	Identity, contact	Contract performance
Customer satisfaction survey	Identity, contact	Legitimate interest in assessing services quality and to deliver a first-rate customer service
Profile	Marketing	Legitimate interest in

		providing further services, and in ensuring that you are not sent marketing material about services you have already bought.
Payments	Payment information	Contract performance
Sharing data with Three Ireland	Your phone number	Facilitation of business relationship with Three Ireland; enabling Three Ireland to identify SIM cards subscribed to the Service

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to have an explanation about how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you, obtain your explicit consent and explain the legal basis which allows us to do so.

4. Disclosures of your personal data

Your personal data may be processed for the purposes set out above under the section "Purposes for which we will use your personal data" by our subsidiaries, holding companies, associated or affiliated companies and companies controlled by or under common control with bolttech (collectively, "the Bolttech Group").

We may share your personal data with the parties set out below for the purposes set out in the table "Purposes for which we will use your personal data" above:

- Internal Third Parties: Other companies within the Bolttech Group acting as our Data Processors, notable those providing IT and system administration services, and undertaking leadership reporting activities.
- External Third Parties: *Three Ireland*
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business corporate structure, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all 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.

5. International transfers

Your personal data may be transferred by us to service providers, acting as Data Processors, based in Malaysia and Hong Kong, which are countries not belonging to the European Economic Area (EEA), not offering the same level of protection of personal data comparable to the one offered in the EEA and in relation to which adequacy decisions by the European Commission do not exist. In order to protect your personal data, we will enter into the standard contractual clauses approved by the European Commission (Decision 2010/87/EU or any replacement therefor approved by the European Commission in a subsequent Decision that

repeals Decision 2010/87) with any processor accessing your personal data from a non-EEA country. You have the right to request a copy of such contractual clauses by contacting us.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the relevant authorities.
- Where we use certain service providers, we may use specific contracts which give personal data the same protection it has in the EEA, as the case may be.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

6. Data security

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 employees, agents, contractors and 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 duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy, which you can request from us by contacting us.

In some circumstances we will 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.

8. Your legal rights

Under certain circumstances, you have legal rights, as stated below, under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out in the link, please contact privacy@bolttech.eu.

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 could 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 calendar month. Occasionally it could take us longer 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.

You have the **right** to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. 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.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove 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 where we are relying on a legitimate interest (or those of a third party) 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.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - 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.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of 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 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.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be

able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- Not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.