

FreeClix Ltd is committed to respecting your privacy and protecting your personal information. To reassure you that we take our responsibility very seriously, this Privacy Policy explains how we will use the personal information you give us. It explains your data protection rights, including how you can opt-out of some uses of your personal information. For more information on your rights and how to exercise them, head straight to the Your choices and rights section.

This Privacy Policy applies if you use any of our products and services. This includes shopping on any of the FreeClix Ltd websites (such as FreeClix.com, store.freeclix.com, simrush.com, portal.simrush.com) or on our apps.

This policy also applies if you contact us or we contact you about our services, whether by telephone, email, SMS, post, push notifications or via third party digital platforms (including websites or social media platforms).

- We will be transparent about the information we are collecting and what we will do with it.
- We will use the information you give us for the purposes described in our Privacy Policy, which include providing you with services you have requested and enhancing your experience with FreeClix Ltd
- We will also use the information to help us understand you better and so that we can give you relevant offers.
- If you tell us you don't want to receive marketing messages we will stop sending them. We will, of course, continue to send essential information relating to a product or service you have purchased to keep you informed about your purchases and ongoing services.
- We will put in place measures to protect your information and keep it secure.
- We will respect your data protection rights and aim to give you control over your own information.

You can access our full Privacy Policy below to help you to understand better how we use your personal information. In it, we explain in more detail the types of personal information we collect, how we collect it, what we may use it for and who we may share it with.

Within the Privacy Policy you will find some specific examples of why and how we use your personal information. If you have further questions please get in touch with us by writing to Data Protection Officer, FreeClix Ltd, Holly Lodge, Holly Lane, Norfolk, NR13 4BY

Without prejudice to your rights under applicable laws, the above and the Privacy Policy are not contractual and do not form part of your contract with us.

Policy last updated on 24<sup>th</sup> May 2018.

## [Who we are and what we collect](#)

This section details what types of personal data we collect and who we are. FreeClix is made up of a number of separate legal entities, so when we say "us", "our" or "we" in this policy we are generally referring to FreeClix Ltd or SimRush Ltd.

We collect information from you when you visit and browse our websites, register for our services, use our apps, make purchases using our services and when you communicate with us.

At times we also receive information from third parties to help us better understand our

customers. However, this Privacy Policy does not cover any third-party websites, apps or services you use or access from our websites, apps or services.

### Who we are

Any personal information processed by FreeClix in connection with this Privacy Policy is controlled by FreeClix Ltd which is considered the “data controller” of your personal information under European Union and UK data protection law.

If you arrange an EE contract via FreeClix then EE will also separately be considered a “data controller” under European Union and UK data protection law. You can access the privacy policy of EE via its own website.

We will treat all information submitted by you in accordance with the terms of this Privacy Policy (as updated and amended from time to time) and in strict compliance with UK and EU data protection legislation. We respect your privacy and will always work to keep your data safe and private.

### What do we mean by personal information

Personal information means details which identify you or could be used to identify you, such as your name and contact details and purchase history. It may also include information about how you use our websites and mobile applications.

### When does this policy apply?

This Privacy Policy applies to personal information about you that we collect, use and otherwise process regarding your relationship with us as a customer or potential customer, including when you use our services, use our websites or mobile applications, purchase our services through third parties (such as our partners)

Where we reference that others are data controllers in the section ‘When we share your personal information’ you should consult their privacy policies for further information.

### Third-party apps, websites and services

If you use any third-party apps, websites or services to access our services, your usage is subject to the relevant third party's terms and conditions, cookies policy, and privacy policy. For example, if you interact with us on social media, your use is subject to the terms and conditions and privacy policies of the relevant social media platform (Facebook, Google, Twitter etc). We may be required to share customer information relating to transactions and use of such third party services, with that third party, for example credit card companies, as described in more detail within this Privacy Policy.

### When do we collect personal information about you?

We collect personal information about you whenever you use our services (whether these services are provided by us or by other companies or agents acting on our behalf), including when you order products and services from us, interact with us via email, call our helpdesks and when you use our website or mobile applications,

For additional details see ‘What types of personal information do we collect and retain?’ below.

In addition, we may receive personal information about you from third parties, such as:

- Companies contracted by us to provide services to you. for example, installation engineers.
- Companies involved in the provisioning and delivery of your services, for example, installation engineers, telecommunications carriers such as BT or EE.
- Companies who provide details to us under privacy polices providing information to be shared with FreeClix Ltd.
- Information providers that specialise in credit checking such as Experian.

## What types of personal data do we collect and retain?

### Improving our services

The information we gather from customers through our websites, apps, products and services, or receive in any other way, helps us to continually improve the goods and services we offer. This includes tailoring the information we share with you to help ensure that it's relevant, useful and timely.

We collect the following categories of personal information

- Information you provide for us to provision and deliver a service or product you have requested from us.
- Information collected during the provisioning of your service or product
- If you place an order, we hold information on the timing and location of your delivery to help us effectively manage resources to fulfil your order.
- We keep a record of electronic communications you receive from us. We also record interactions you have with our electronic communications. For example, whether an email has been opened and if you have clicked on any links within that email.
- We keep a record of your purchases with us (for example, what you bought and when) and how you browse and engage with our websites and apps. This helps us decide which products, services and promotions may be relevant for you. It also helps us to improve your experience, assist you more efficiently if you have any questions or concerns about your order, and promote certain products, services and offers.
- We will keep a record of any email correspondence you send us. This helps us provide you with better customer service, and to improve the experience of our customers overall. Telephone calls made to FreeClix Ltd may be recorded for monitoring and quality control purposes.
- Information about the technical configuration of your products and services.
- Information about the services we have provided to you in the past.
- Information about online registration and other interactions.
- When you visit and use any of the FreeClix Ltd websites, or when you interact with our adverts and content on third-party websites and social media platforms (such as Google or Facebook), we use cookies, other tracking technologies and third-party services so that we can better understand your online experience. This helps us to improve our services and offer a personalised experience. We may do this by recording the way you use, navigate, browse and search our websites, our apps, or other websites and platforms. For more information on our use of these technologies, see the cookies policy on our individual websites.

- When we contact you or you take part in competitions, surveys or questionnaires about our products and services, we may collect your feedback and contributions. This includes direct messages you may send us through social media channels.

When placing an order on our webstore we also gather this information:

- When you register with us, we ask for information such as your title, name, email address, delivery address, telephone number, and to create account login details (such as your username and password). We store this information to make your experience easier, so you do not need to re-enter your details each time you shop.
- We may also ask you for your debit or credit card details in order to process your payment. We never store your payment details in full, we only store an encrypted token that represents your payment card.

## How we use your personal information

We only ever use personal information as is necessary, to provide you with the quality products and services you request and expect, or to prevent the misuse of our products and services. We also use your personal information for our own legitimate interests. This allows us to improve our products, better understand customer preferences, and to market products or services you may like. With your consent, we may send you certain promotional communications we feel are relevant. We may also use your personal data to comply with law when required.

All the information we collect through our websites, apps, products, services, and through correspondence with you, is used by FreeClix Ltd to operate and improve the services we offer you. We will only use your personal information for:

### 1. Purposes necessary for the performance of a contract with you.

This means:

- To deliver the services you have asked for. This includes dealing with orders and accounts for the supply of our goods, products and services and to help you do business with us.
- To send status updates and service communications to you.
- Enabling third parties to carry out technical, logistical or other functions on our behalf.
- Retaining payment information to provide you with services you have requested and paid for.
- Enabling a debt collection agency to collect payment from you should that be necessary.
- Preventing and detecting fraud or abuses of our website or services.
- Responding to and resolving complaints.

### 2. Our legitimate interests

As a commercial internet service provider FreeClix has a legitimate business interest to use the personal information we collect to offer an effective service and carry out our business.

This means:

- A. To develop new products and services.

- We use the information collected about how people use our services. This is alongside feedback provided directly to us to troubleshoot and identify trends, usage, activity patterns, and to help us improve the quality of our service. For example, we may analyse customer shopping habits to determine how best to offer relevant product pairing.
- We ask for your feedback on our products, websites, apps, and other services and activities which third parties may carry out on our behalf, including the use of surveys.
- We also test and analyse certain new features with some users before rolling them out to all users.
- We use personal data (which may be in an anonymised and aggregated format in some instances) to help plan and manage our business activities such as deciding when to promote different products and services.

B. To inform you about products and services that may interest you.

- We also share certain information with our selected suppliers to enable them to identify new prospective customers on our behalf and not to target advertise to individuals who are already customers.

C. To personalise and improve your experience on our websites

- We remember your choices and preferences to keep our websites running smoothly. For example, we'll remind you of products you buy frequently, and we'll remember your order in case your shopping session is interrupted.
- We personalise your experience on our websites by tailoring to your preferences. For example, by showing you products that we think you will like based on your shopping and browsing history. This may include targeted coupons or gifts. We create lists of your favourite products; remind you of products you may have forgotten (based on your shopping habits); recommend new items based on products other customers purchase and that we think you may like. Even the order in which products are displayed for you in response to a search query or aisle browsing may be based on your regular shopping habits.

D. To protect our legal rights and business interests.

- We use personal data to protect the rights, property, or safety of the FreeClix Ltd companies, our customers or others. For example, we use your data (such as your name, address, details of failed payments and orders placed with us) to assist in monitoring for fraudulent transactions and failed payments.
- We also use personal data in connection with legal claims, compliance, regulatory and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

3. Purposes for which you have provided us with your consent.

We may collect and use your personal information where you have given your specific consent to us doing so.

This means:

- To send you electronic marketing. By 'electronic marketing' we mean marketing by email, telephone, SMS, push notifications and web advertising to inform you about the products and services we offer. This includes events, prize draws, competitions, gifts, vouchers, coupons, surveys, special offers and promotions (from specially selected partners if appropriate).
- To use User Generated Content. By 'User Generated Content' we mean content created by you, and shared publicly (for example as a product review on our website) and which may showcase our brands or products and services.

When will we send you marketing?

When we collect information directly from you we may ask you if you do not want to receive our marketing communications. Please be aware that we do sometimes send marketing communications that promote a third party's products and services (for example, those of our business partners) as well as our own.

We may ask if you consent to receiving marketing communications from other members of our group or from third parties.

We will respect your choice as to what communications you wish to receive and how these are sent.

If you decide you would no longer like to be sent marketing communications, you can change your mind at any time. The ways to stop being sent marketing communications are:

- a) You can write to us: FreeClix Ltd, Holly Lodge, Holly Lane, Norfolk, NR13 4BY
- b) You can email us: [consent@freeclix.com](mailto:consent@freeclix.com)
- c) In addition, each marketing communication we send by email will also have an unsubscribe option which will allow you to stop you receiving further marketing emails.

Please note that if you tell us that you do not wish to be sent further marketing communications, you will still receive service communications (as described above) which are necessary, for example, to manage your orders or to provide you with an update on its status. If you ask us to stop sending marketing communications, please note we will retain your personal information for the purposes of indicating that you do not want to receive marketing communications.

#### 4. Fulfilling our legal obligations.

This means:

- Allowing us to comply with any requirements imposed on us by law or court order, including disclosure to law or tax enforcement agencies or authorities or pursuant to legal proceedings, including the issuing of product recalls.
- Maintaining records to meet legal, regulatory and tax requirements.
- To collect and recover money that is owed to us.
- To investigate fraudulent activities that may occur on a customer's account.
- To help us defend legal claims or to exercise legal rights.

- Contacting affected customers in connection with product recalls or other similar product quality issues.

## When we share your personal information

We only share your personal data as required for the purposes set out in this Privacy Policy; to third parties who assist us with the provision of our services, to send related promotional communications to you, and to assist us in preventing the fraudulent use of our services.

Information about our customers is an important part of our business. However, there are circumstances where it is necessary for us to share personal information, for example, for us to provide our customers with delivery and installation services. Whenever we use or disclose your information, we put in place measures to keep it secure. We make sure it is protected as far as reasonably possible.

The circumstances where we share some of your information with others are:

### *1. Other FreeClix companies*

- We share personal data with other companies within the FreeClix Ltd group of companies which includes SimRush Ltd.
- In connection with legal claims, compliance, regulatory and audit functions.
- For disclosures in connection with the acquisition, merger or sale of a business.
- To support and better understand customers that use our services, websites and apps.
- To send you relevant marketing information from other FreeClix Ltd companies where you have told us that you would like to receive such marketing information.

### *2. Third-party service providers*

We employ other companies or individuals and may work in partnership with selected third parties to perform any of the functions listed above (under the 'How we use your Personal Information' section) on our behalf. We only share information that allows them to provide their services to us or to facilitate them providing their services to you.

- Companies to analyse customer information to help us better understand how you use our services. Also to tailor products, services and offers that may be relevant for you.
- Companies to provide marketing and advertising assistance (including management of email marketing operations, mobile messaging services such as SMS, and services that deploy advertising on the internet or social media platforms, such as Facebook and Google) as well as analysis of the effectiveness of our advertising campaigns.
- Credit and charge card companies, credit reference agencies and anti-fraud screening service providers to process payments and (where necessary) to carry out fraud-screening.
- External companies to provide post or courier delivery services when selected by customers.
- Other service providers needed to deliver the services you have asked for where, for instance, you need an installation of a service at your premises.
- General service companies such as printers and mailing houses that distribute direct mail marketing.
- Companies that help us track and record the way you navigate our websites and use our apps, so that we can understand your online experience and use it to improve our services and offer a personalised experience.

- Companies that help us to run surveys and get your feedback on our products and services.
- Other companies that help us provide our websites and apps, improving functionality so that we can provide you with a high-quality experience whenever you shop with us.
- We may provide usage information (but not your personal details) to other websites so that they know that you have visited our websites.

### *3. Promotional communications from specially selected partners*

Sometimes we send communications (including offers) on behalf of, or in partnership with, specially selected partners, for example EE and BT, when we have identified offers that we believe will be of interest to you. We will only do this if you have previously agreed to receive these marketing communications. We will not permit other businesses to contact you separately, we do not share your personal data with these companies and all such promotional communications will come via us.

We do not sell your personal information to third parties.

### *4. Business transfer*

If any FreeClix Ltd company is ever sold or its assets are purchased by another company it would typically be part of such a transaction for customer information to form part of the business assets being transferred. However, the information will remain subject to the obligations as outlined in this Privacy Policy.

### *5. Research companies*

We may share personal details in a secure way to allow research companies and feedback providers to contact you directly on our behalf, in order to capture your opinions on our products and services, our websites and apps. We may ask these research companies to analyse the results so that we can better understand your online experience, which will help us to improve our services. We provide them with only the information they need to perform their function. This may take the form of a survey, where you may be asked to review a product or service you've bought. You will always have the choice about whether to take part in our market research or surveys.

### *6. Protection*

We release account and other personal information when we believe release is appropriate to comply with the law, to enforce or apply any contract between you and FreeClix Ltd company, or to protect the rights, property or safety of the FreeClix Ltd, our employees or customers, our business partners or others. For example, we may engage agents including debt collection agencies to assist us to process elements of the orders you place with us, or who assist us in the service we provide to you. In these instances, we provide them with only the information they need to perform their function.

Third parties, such as the police and regulatory authorities, to protect our rights, property, or the safety of our customers, staff and assets.

In response to a valid, legal request from Government and law enforcement agencies in any jurisdiction, including where that obligation arises because of a voluntary act or decision by us

Customs authorities and law enforcement bodies of any country to which your products and services are delivered to.

## *7. Fraud Prevention*

Where we have reason to suspect fraud or the commission of any other criminal offence, we may share your data (such as your name, household information, details of failed payments and your orders placed with us) with crime prevention agencies and certain third parties for the purpose of detecting and preventing crime. Such third parties may include business partners, law enforcement bodies, providers of fraud prevention and detection services, and recipients of fraud prevention and detection services. If we think there is a risk of fraud, we may suspend activity on your account or refuse access to your account and/or cancel an order.

## [Security, data retention and international data transfers](#)

We know how important it is to protect and manage your personal data. This section sets out some of the measures we have in place. We take the security of your personal information seriously and employ technical and organisational measures to protect the integrity and privacy of your personal information. We only retain your personal information for clearly established periods.

### *Our security*

Our websites use Secure Socket Layer (SSL) encryption technology to ensure that your information is protected. Our web pages will start with https and a padlock will be displayed in front of the web page name to show that we always encrypt the information that you send us.

We maintain and enforce physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of your personal information. However, whilst we take appropriate technical and organisational measures to safeguard your personal data, please note that we cannot guarantee the security of any personal data that you transfer over the internet to us.

Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you, including in relation to a subject access request.

### *Payment security*

We are committed to ensuring the protection of your payment card details and are compliant with the Payment Card Industry's Data Security Standard (PCI-DSS).. Payments made via our sites are processed and managed by specialist payment card companies which are not part of the FreeClix Ltd. We only store and display the first six and last four digits of your payment card number, the card type and the card expiry date. The full payment card number is never stored on any of our systems and is only stored and processed by one of our payment card processing companies.

We keep an encrypted token to represent your card and this token is transmitted to the relevant payment card processing company during the order processing.

We use 3D Secure to provide additional fraud protection and to protect your payment card from unauthorised use. During the checkout process, you may be asked by 3D Secure to provide your Verified by Visa or Mastercard Secure Code password.

### *Data Retention*

We retain your personal information for as long as you are a customer and we need it in order to fulfil the purposes described above. After you stop being a customer, we may keep your data for a certain period of time, after which we take steps to delete your personal information or hold it in a form which no longer identifies you (as we may still need to use your data in an anonymised format for research and other business purposes).

We may keep your personal information for a number of reasons after you have stopped being a customer. This includes: to respond to any questions or complaints, for legal, regulatory or technical reasons, for research and analytics, to investigate fraudulent activities, and to show that we treated you fairly.

#### *Keeping your information*

We will keep your personal information for as long as you are a customer of the FreeClix Ltd, which includes SimRush Ltd, and for a period of time afterwards if you stop doing so.

Here are our time periods for retaining customer information:

- Customers that have registered on our website or contacted for a quote but never made a purchase from us: we keep your personal information for eight years after the date of first registration.
- Customers that have not shopped for an extended period of time: we keep your personal information for seven years after the date of your last purchase.
- Customers who have asked for their accounts to be closed: we keep your personal information for seven years after the date your account was closed.
- Call recordings: we delete call recordings after 30 days unless we need the data to investigate fraud, to respond to questions or complaints or for legal reasons.
- Customer account notes: after three years we delete notes made on your account by our operations and technical staff, unless we need the data to investigate fraud, to respond to questions and complaints, or for legal reasons.

### [Your legal rights and choices in relation to the personal data we hold about you.](#)

This section explains how you can exercise your individual rights in relation to your personal data the legal rights and choices you have when it comes to receiving marketing communications. Further explanation of those rights and the exceptions to them are set out below.

What if you want access to the personal data we hold?

You have the right to access a copy of the personal information we hold about you. You have the right to request that this information is provided in an electronic format in the event that you wish it to be transferred to yourself.

There are some limited exceptions to this right, such as information relating to others who have not consented to the disclosure of their information and information which is legally privileged. Please see "Requesting access to your personal data" section below.

#### [What if you want to amend information we hold about you?](#)

You may ask us to correct your personal information if that information is inaccurate. How to do this see section below 'Updates and how to contact us.'

## Requesting your data to be erased.

You may ask for personal information which identifies you to be erased (or forgotten). The right is not absolute and only applies in certain circumstances.

We cannot erase information in circumstances where we need to retain it to meet the obligations we have to comply with legal obligations and official authorities.

As the right to erasure does not apply for the establishment, exercise or defence of legal claims this means we cannot erase your personal information if we have identified that you either have an open complaint with us or we hold a previous case for you within the past 6 years. We are required to retain this information in case there is a need to re-open the complaint.

## Requesting access to your personal data

Responses to exercise your rights will be provided within one month and generally there is no fee for making these requests. If your request is particularly complicated we may extend the deadline for responding to three months, but we will let you know if this is the case.

We will require you provide us with evidence of your identity in order to process your request.

We will handle all requests in accordance with applicable law. However, depending on the right you wish to exercise, and the nature of the personal information involved, there may be legal reasons why we cannot grant your request.

## What if you want us to stop using your personal information?

You can ask us to stop using your personal information if there is no need for us to keep it. You can also ask us to restrict the use of your personal information in certain circumstances. These rights are known as the 'right to restrict processing'.

You can also object to certain processing activities which use your personal information, in particular where the processing is based on our legitimate interests unless it is needed for dealing with legal claims or we have other compelling legitimate reasons that override your rights.

You may be unable to continue using our services if you require us to stop using your personal information, since this information is necessary for us to accurately fulfil and provide our services.

We may need to retain certain elements that relate to a contract between you and FreeClix Ltd because we need it for our own legal and auditing purposes (for more information on the basis on which we process your personal information see the section 'How we use your personal information')A record of your request including the name you supplied will be retained for 3 years in the application used to carry this out.

There may be reasons why the above rights may be limited in some circumstances. For example, we can refuse to provide information if fulfilling your request would reveal personal information about another person, if you ask us to delete information which we are required to have by law, have compelling legitimate interests to keep, or need to access in order to exercise our legal obligations. In such situations, we would only use your information for these purposes and not use or share your

information in other ways. We will always ensure your privacy is protected and data will always be retained in accordance with the Data retention section of this policy.

#### *How to withdraw your consent*

Where we have asked for your consent, you may withdraw consent at any time, but this will not affect any processing that has already taken place. Please contact [privacy@freeclix.com](mailto:privacy@freeclix.com)

#### *Unsubscribing from our marketing communications*

You may request us to stop sending you marketing. If you do so we will no longer be able to send you marketing communications by contacting us at any time. However, if you subsequently purchase a product or service from us we will need to send you communications about the services you have purchased, such as your installation or delivery time and date. These communications will help you get the most from the services we provide and may also contain options and other details about the services you will be using.

You can opt out of receiving our marketing communications. simply by doing one of the following:

1. Going to the marketing preferences page on the relevant website and ticking or unticking the appropriate boxes.
2. Clicking on the unsubscribe link contained in marketing emails.
3. Emailing us at [privacy@freeclix.com](mailto:privacy@freeclix.com) if you wish to opt out of any postal marketing or other electronic marketing.
4. If you decide to opt out or unsubscribe it could take up to 72 hours to process the update through our systems. Whatever you choose, you will still receive messages and other important service information such as changes to your existing products and services.
5. We may also ask you to confirm or update your marketing preferences, if there are changes in the law, regulation, or the structure of our business.

## [Updates and how to contact us](#)

This Privacy Policy came into effect on 25 May 2018 and replaces our previous Privacy Policy. This Privacy Policy applies to all information we process about you in connection with your relationship with us as a customer or potential customer.

#### *Letting us know if your personal information is incorrect*

If the information we hold on you is wrong or incomplete, then let us know what needs updating and we'll correct it. This is your right. Email us at [privacy@freeclix.com](mailto:privacy@freeclix.com)

#### *Updates and changes to the Privacy Policy*

We may change the terms of this Privacy Policy from time to time and you should check it regularly. The date on which the Privacy Policy was most recently amended will be displayed at the beginning of the policy. If we make any material changes to this Privacy Policy we will take steps to call it to your attention.

#### *Contact us*

We hope that we will be able to resolve any concerns you may have. If you have questions about your personal information and our Privacy Policy, or wish to exercise any of your rights described in this policy, please email us at [privacy@freeclix.com](mailto:privacy@freeclix.com)

## HOW TO COMPLAIN

If you are not satisfied in the way we have dealt with your concerns, you have the right to complain to the Information Commissioner's Office. Please go to <https://ico.org.uk/concerns/> to find out more or write to:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113