

UNLEASHED NV PRIVACY POLICY

1. General

'Mobile Vikings' is a product of Unleashed nv, with its registered office at Kempische Steenweg 309/1, 3500 Hasselt, with company number: 0886.946.917 (hereinafter '*Unleashed*').

In the context of the provision of its telecom services (including mobile telephony), Unleashed processes different types of your personal data for various purposes. The collected data is stored and managed in systems controlled by Unleashed. Unleashed is the controller of your personal data. This means that Unleashed shall determine the purpose of and means by which your personal data is processed.

Unleashed regards the protection of your privacy as paramount. It is therefore the intent of Unleashed to provide you with as much information as possible in this privacy statement as regards the data collected, the purpose of the collection thereof, and how long it will be stored, along with what your privacy rights are and how these may be exercised. For this reason, we recommend that you read this privacy statement thoroughly. Should you have any questions in relation thereto, you are naturally free to contact us at any time using the contact details listed below.

2. How data is collected by Unleashed

◆ Data that you personally provide us with

You are required to create a Mobile Vikings account to use Unleashed products and services. On creation of an online Mobile Vikings account, you shall be requested to submit certain data, such as: your name, postal address, e-mail address, telephone number, date of birth, invoicing details and password. Even should you sign up for a special deal or promotion, you may be requested to provide certain (additional) data. In addition, we will collect information should you contact us by e-mail or telephone (e.g., when you have questions about our products or services or provide reviews on certain products or services – e.g., Viking Lab), or should you use an online application (e.g., subscription to newsletters via e-forms [e.g., SEPA], enter data in a chatbox, provide data through use of a mobile app [e.g., Mobile Vikings app or itsme app] or via other social media applications, such as Facebook).

◆ Data collected based on your use of our services/Viking Deals

We also collect data on how you use our services (including usage and traffic data - see below), as well as data relating to your payment behaviour and the devices used to access our services (e.g. type, brand and operating system of your device).

If you use Viking Deals, we will also receive personal details in that context. More details on this can be found in the [Viking Deals Privacy Policy](#).

In addition, we use cookies and similar technologies on our websites and apps to improve the user experience, among other things. More details about this can be found in the [Cookie Policy](#).

3. What data do we collect?

Unleashed processes the following types of personal data:

- ◆ **Identification, contact and payment data:** Unleashed processes the identification and contact data you submit on registration for a Mobile Vikings account or a promotional campaign. The data we process in this context may include, for example: your name, address, e-mail address, telephone number, date of birth, and gender, as well as any invoicing and payment details. Whether or not the data requested is mandatory is stated on the registration procedure. Should the data requested be mandatory, the registration process cannot be completed without your provision of such. Should this information not be provided, Unleashed will be unable to provide you with its services (under optimal conditions).
- ◆ **Traffic data:** Unleashed also processes traffic data (such as, e.g., the identity of the caller's and called party's telephone number; the so-called IMSI number of the calling and called participants in the telephone call (i.e. an international number to identify you as a mobile subscriber); the so-called IMEI number of the calling and called participant's mobile terminal (i.e. identification number of the end user's mobile device); the date on and exact time at which the call begins or ends, etc.). This special technical data is processed to provide you with access to the communications network and to facilitate response to any questions by judicial or other governmental authorities.
- ◆ **Other technical data:** Under certain circumstances, Unleashed may also process other technical data (such as, e.g., the model and service number of your mobile phone or the software version in use). Under such circumstances, this data is required for the proper functioning of our services.
- ◆ **Usage data:** We also process data received on the use of our services. For example: the (mobile) telephone numbers called, along with the date, time, duration, usage volume and location of a call. Among others, this data shall be used to invoice you as a customer correctly, to detect fraud and possibly inform you about products that are better suited to your use (unless you should object thereto - see below: 'right to object').
- ◆ **Other data personally provided:** Data obtained when you ask a question by e-mail or contact us (e.g., via telephone, our chatbox or through other social media applications such as Facebook) shall also be processed. Data obtained by market research (surveys/questionnaires) that we conduct, where your participation therein should have been of a voluntary nature, shall also be processed.

4. For what purpose will this data be used?

Personal data shall be processed for various purposes, whereby in each case only the data required to achieve the intended purpose shall be processed.

For example, personal data shall be used where this should prove necessary:

- ◆ in the context of preparing, implementing or terminating our contract with you (e.g. for the provision of information, supply of our products and services, invoicing, etc.);

- ◆ to comply with the legal or regulatory provisions to which we are subject (e.g., compliance with tax legislation, provision of information to public authorities in the context of judicial investigations, etc.); and/or
- ◆ for the protection of our legitimate interests, in which case we strive at all times for a balance between this interest and the respect of your privacy (e.g., where marketing and advertising of our services is concerned).

Consent to the processing of your personal data shall be requested of you should the processing of your personal data not be necessary for one of the three aforementioned reasons.

Specifically, we collect your personal data for the following specific purposes:

- ◆ **To process your request for our services:** Should you not yet be a customer and visit our website to obtain and/or request information about our products and services, your contact data shall be required in any case. All information received about you in this (pre-contractual) phase shall only be used to provide you with the requested information. Should you eventually decide to become an Unleashed customer, you must, for the management of our contractual relationship, provide certain personal data to create an account (see above). If you entered your details on our website, but did not entirely complete the purchase process, we will send you a one-time reminder via email.
- ◆ **To execute our contract with you and to facilitate the provision of our services:** This data is primarily used for the provision of our services and for all administration related thereto. The contact data provided may be used to notify you of changes to the services or to provide you with additional information about such changes. This data shall also be used for invoicing and payment purposes.
- ◆ **For the purposes of improving our service provision and the identification of general trends:** We are permitted to employ our general usage information to identify areas requiring improvement in our services. This occurs, among others, based on your feedback on our services, data we obtain during contact with you (e.g., in writing or by telephone), questions you have posed or customer service conversations which have been recorded. You may also be requested to voluntarily participate in certain surveys to make it possible for us to assess and improve our services and/or research and develop new products or services.
- ◆ **For the purposes of keeping you informed about news, future deals and/or promotions and new Unleashed products and services:** Unleashed may also use your contact data to communicate with you (in writing, by telephone or electronically) about news, future deals and/or promotions we believe may be of interest to you or to offer new Unleashed products and services. We may also use the data at our disposal for profiling purposes (i.e., to classify you in one or another category for the purpose of sending custom marketing), unless you should object thereto (see below: 'right to object'). Unleashed shall take your personal preferences into account at all times. Your personal preferences may be set on your profile page, via which you can also communicate which news, future deals and/or promotions you wish to receive in these messages. We may also contact you when you are no longer an Unleashed customer, and this for a maximum of 24 months following the cessation of our relationship.
- ◆ **To show you custom online messages or advertising:** Unleashed can share your contact details in a pseudonymized form with online marketing companies such as Google and

Facebook. If you are also familiar with these companies and your communication and privacy settings on their platforms allow so, Unleashed can show you appropriate advertising via their channels.

- ◆ **For the purposes of fraud prevention and/or its detection:** Unleashed may also use your data to prevent, detect and investigate illegal or suspected illegal activities, such as fraud (e.g., via a method of payment), as well as to enforce our general terms and conditions.
- ◆ **For the purposes of compliance with legislative and regulatory requirements:** We may also use your personal data to satisfy legislative and regulatory requirements that Unleashed must comply with and to have audits and controls performed. Unleashed may be required by law to disclose personal information in the context of a dispute or litigation, or should this be required by certain government agencies (e.g., police, courts, emergency services). For the purpose of complying with these legislative and regulatory requirements, we may disclose this information without your knowledge, consent or even without notification thereof. Furthermore, we are legally obliged to retain certain data within the framework of our general tax and accounting obligations.
- ◆ **For the purposes of retaining studies, tests and statistics:** Your anonymous, aggregated data, for example, may be used to report internally and externally on the use of our services. The data used to this end cannot be traced to a specific individual. The information obtained from these analyses shall be used to assess our current product and service portfolio and our processes and to adjust these based on new developments.

5. To which third parties might this data be transmitted?

- ◆ **To suppliers, subcontractors and other service providers:** Other companies, agents, subcontractors or other service providers shall be relied upon to perform certain services on our behalf or to assist us in providing you with services. For example, we work with suppliers to provide marketing, communications, infrastructure and IT services, to optimise our services, process credit card transactions and mitigate credit card fraud and fraud related to other payment methods, to provide customer service, recover debts, analyse data, and process and manage user feedback.

These suppliers may obtain access to your personal data or other information when providing such services.

Unleashed is a mobile virtual network operator ('MVNO') and uses the network of a mobile network operator ('MNO') to provide mobile services to its customers. This also necessarily entails potential access to certain data by the MNO managing the network used by Unleashed. For example, this operator has access to the location data allowing it to determine the location of your SIM card. Location data indicates which telecommunications mast or Wi-Fi point your mobile device is connected to. This data may be used for network planning and management by the MNO, but also in the context of certain legal obligations, for example to transmit your location in case of emergency calls or at the request of government services in the context of a judicial investigation.

In any event, these companies are only permitted to process your personal data to the extent necessary for the provision of their services or compliance with certain laws, and we require that they take the necessary measures to respect the confidentiality of your personal data and to provide appropriate security to this end.

- ◆ **To government offices:** We may also share or transmit personal data, including the content of your communications: (i) to comply with the law or as part of legal process or requests; (ii) to detect, prevent or otherwise address fraud and technical security issues; or (iii) to protect Unleashed's rights and property, including the enforcement of our general terms and conditions of use.
- ◆ **To others with access to your Mobile Vikings account:** Should you share your Mobile Vikings account with others or grant access to your account via another means, such persons will be able to view your (personal) data.
- ◆ **Business transfers:** Unleashed reserves the right to transfer data, including personal data, in connection with any reorganisation, restructuring, merger, sale or other transfer of company assets, provided that the receiving party consents to process your personal data in accordance with this privacy statement.

6. What measures are taken to secure my personal data?

The protection and security of your data are top priorities. A variety of security technologies and procedures are deployed to provide your data with appropriate protection against unauthorised access, use or disclosure. For example, the personal data you share is stored on computer systems with restricted access and which are housed in secure buildings.

Nevertheless, it is not possible to guarantee any security system as 100% secure. We are unable, therefore, to guarantee the categorical security of your data and refuse any liability for unauthorised access thereto. By using our services or otherwise providing information to us, you consent to any electronic communications sent by us in regard of security, privacy and management issues relating to your use of our services. You are responsible for maintaining the confidentiality of the password used to protect your accounts and personal data. This means that if you share a computer with others, you should always log out before leaving the service.

7. Retention period

We shall not retain your data longer than is necessary to achieve the purpose for which it was collected, in particular with respect to the statutory storage and limitation periods and taking into account the fact that some data must be retained for a certain period of time by virtue of certain laws. You may request additional details on the retention periods applicable to the various aspects of your personal data of us.

8. Your rights

Unleashed is pleased to inform you about your rights in connection with our use of your personal data, along with how these rights may be exercised.

➤ *What are the rights to which you are entitled?*

You are entitled to the following rights with respect to the processing of personal data:

- ◆ **Right of access**

You have the right to know whether or not Unleashed processes your personal data at all times. Should Unleashed process this data, you have the right to receive additional information about:

- ❖ the processing purposes;
- ❖ the categories of personal data involved;
- ❖ the recipients or categories of recipients (e.g., service providers who process certain personal data on behalf of Unleashed);
- ❖ where possible, the storage period or, should this not be possible, the criteria for determining this period;
- ❖ the existence of your privacy rights;
- ❖ the right to lodge a complaint with the supervisory authority;
- ❖ the information that Unleashed has at its disposal concerning the source of these data, in the event that Unleashed should have obtained this data from a third party;
- ❖ the existence of automated decision-making (i.e., decisions made concerning your person by technological means, but without any human intervention).

You are also entitled to receive a free copy of the processed data in an intelligible form. Unleashed may charge reasonable fees to cover its administrative costs for any additional copy requested.

◆ **Right to rectification of personal data**

You have the right to have incomplete, erroneous, inappropriate or outdated personal data corrected or deleted. We therefore recommend that you regularly verify whether these are still up to date. As soon as you log in via your account, you can easily manage certain personal data yourself. For other issues, our contact details may be found at the bottom of this document. We shall then modify or delete this information, where necessary, within the legally established deadlines.

◆ **Right to erasure of data/right to be forgotten**

You have the right to have your personal data deleted without unreasonable delay in the following cases:

- ❖ your personal data is no longer needed for the purposes for which it was collected or otherwise processed by Unleashed;
- ❖ you withdraw your previous consent to processing and there is no other legal basis to which Unleashed may appeal for (continued) processing;
- ❖ you object to the processing of your personal data and there are no more serious or justified grounds for (continued) processing by Unleashed;
- ❖ your personal data has been unlawfully processed;
- ❖ your personal data must be deleted to comply with a legal obligation;
- ❖ your personal data was collected when you were still a minor.

That Unleashed may be prohibited from deleting all requested personal data at all times must be taken into account, for example, where Unleashed should be legally obliged to keep this data up to date (e.g., invoicing data) or where the processing thereof is required for the institution, exercise or substantiation of a legal claim. In this regard, Unleashed shall inform you in greater detail in its response to your request.

◆ **Right to restrict processing**

You have the right to obtain a restriction on the processing of your personal data should one of the following hypotheses apply:

- ❖ you contest the accuracy of the personal data: the use thereof is limited for a period of time to enable Unleashed to verify the accuracy of the data;
- ❖ the processing of your personal data is unlawful: instead of deleting your data, you request the restriction of the use thereof;
- ❖ Unleashed no longer requires your data for the original processing purposes; however, you require it for the institution, exercise or substantiation of a legal claim: instead of deleting your data, the use thereof is restricted to the institution, exercise or substantiation of the legal claim;
- ❖ to the extent that no decision has been taken yet on the exercise of your right to object to the processing, you should request that the use of your data be restricted.

◆ **Right to data portability**

You have the right to request the transfer of your personal data, for example to facilitate a change of service provider. This shall only be possible for the personal data you have provided to Unleashed yourself, based on consent or following agreement. In all other cases, you may not invoke this right (for example, where your data are processed on the basis of a legal obligation).

Should you exercise this right, you may appeal to Unleashed to have the relevant personal data: (i) returned in a structured, common and machine-readable form; and (ii) transferred directly to another controller. Where this should be the case, you are responsible for the accuracy and security of the (e-mail) address you provide for the transfer. However, Unleashed may refuse this right should the transfer be technically impossible.

◆ **Right to object to processing**

You have the right to object, based upon your particular circumstances, to the processing of your personal data, where the processing is in the legitimate interest of Unleashed or in the public interest. Unleashed shall discontinue processing of your personal data, except where Unleashed is able to demonstrate compelling and legitimate grounds for processing that outweigh yours, or should the processing of personal data concern the institution, exercise or substantiation of a legal claim. You have the right at all times to object to processing in the context of direct marketing and to profiling that Unleashed performs with a view to direct marketing.

◆ **Right to withdraw consent**

To the extent that the processing of personal data is based on consent, you are entitled to withdraw your consent at any time.

◆ **Right to object**

You have the right to lodge a complaint with the Data Protection Authority. The Data Protection Authority may be contacted at the address below:

Data Protection Authority
Rue de la Presse/Drukpersstraat 35
1000 Brussels

For additional information, Unleashed refers to the Data Protection Authority website:
<https://www.dataprotectionauthority.be/>

➤ *Procedure for exercising your rights*

◆ **Request**

Your rights may be exercised by submitting a request to privacy@mobilevikings.be, or to the following address:

Unleashed nv
Kempische Steenweg 309/1
3500 Hasselt

For the exercise of your rights and the prevention of any unauthorised disclosure of your personal data, your identity must be verified by Unleashed. Should there be any doubt or ambiguity, Unleashed shall first request that you provide additional information (usually a copy of the front of your identity card).

◆ **Costs**

You may exercise your privacy rights free of charge, unless your request should be manifestly unfounded or excessive due to its vexatious nature. Where this is the case, Unleashed has the right and option - in accordance with privacy laws - to (i) charge a reasonable fee (taking into account the administrative costs of providing the requested information or communication and the costs associated with taking the requested action), or (ii) refuse to comply with your request.

◆ **Form**

If your request is submitted electronically, the information shall be provided electronically where possible, unless you should request otherwise. Unleashed shall, in all cases, provide you with a concise, transparent, understandable and easily accessible response.

◆ **Period**

Unleashed shall respond to your request as soon as possible, and at least within one month of having received your request (this period starts as soon as your identity has been sufficiently demonstrated to Unleashed). Depending on the complexity of the requests and their number, this period may be extended by two months. Should the term be extended, Unleashed shall notify you thereof one month after having received the request.

◆ **Failure to comply with your request**

Should Unleashed fail to comply with your request, Unleashed shall always inform you of the option to lodge a complaint with a supervisory authority and/or to file an appeal with the court in its reply.

9. Amendments to this privacy statement

From time to time, this privacy statement shall be amended, for example in the context of changes to our services. At such time that the amendments to the privacy statement are published, the date of the 'last update' shall be modified at the bottom of the document and you shall be notified thereof in advance (e.g., notification by e-mail) and, where required by law, your prior consent shall be requested.

10. Contact

Should you have any questions about our products or services or about this privacy statement, please contact us via one of the means listed below:

- ◆ By post: Unleashed nv, Kempische Steenweg 309/1, 3500 Hasselt
- ◆ Email: privacy@mobilevikings.be

11. Miscellaneous

This privacy statement is governed by Belgian law. All disputes relating to this privacy statement fall under the exclusive jurisdiction of the courts of Hasselt.

Last update: 30 November 2018