

MOBILE VIKINGS NV PRIVACY POLICY

1. General

'Mobile Vikings' and 'JIM Mobile' are products of Mobile Vikings nv, with its registered office at Kempische Steenweg 309/1, 3500 Hasselt, with company number: 0886.946.917 (hereinafter '*Mobile Vikings*').

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

Mobile Vikings regards the protection of your privacy as paramount. It is therefore the intent of Mobile Vikings to provide you with as much information as possible in this Privacy Policy 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 Policy 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 Mobile Vikings

◆ Data that you personally provide us with

You are required to create an account to use Mobile Vikings products and services. On creation of an online 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 and Twitter).

◆ Data collected based on your use of our services (incl. Viking Deals)

We also collect data on how you use our services (including location 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 \(Mobile Vikings and JIM Mobile\)](#).

3. What data do we collect?

Mobile Vikings processes the following types of personal data:

- ◆ **Identification, contact and payment data:** Mobile Vikings processes the identification and contact data you submit on registration for an 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 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, Mobile Vikings will be unable to provide you with its services (under optimal conditions).
- ◆ **Traffic and location data:** Mobile Vikings also processes traffic data. These are all (raw) technical data generated by your use of our services. This data includes 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 location of the network connection point (at the beginning and at the end of the call) and all other data used to correctly create your usage and invoicing data. 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, Mobile Vikings 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 and invoicing 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 and usage volume 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 and Twitter) 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 a Mobile Vikings 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 Mobile Vikings products and services:** Mobile Vikings 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 Mobile Vikings 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'). Mobile Vikings 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 a Mobile Vikings customer, and this for a maximum of 24 months following the cessation of our relationship.

- ◆ **To show you custom online messages or advertising:** Mobile Vikings can share your contact details (email and telephone number) 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, Mobile Vikings can show you appropriate advertising via their channels.
- ◆ **For the purposes of fraud prevention and/or its detection:** Mobile Vikings 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), smishing and phishing, 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 Mobile Vikings must comply with and to have audits and controls performed. Mobile Vikings 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. We also make use of the services of suppliers (Bisnode and CheckDoc) who support us in verifying the accuracy and quality of the identification information you provide, enabling us to prevent identity fraud and theft.

These suppliers may obtain access to your personal data or other information when providing such services. In any case, we only give these companies permission to process your personal data to the extent necessary for the provision of their services or compliance with certain legislation, and require them to take the necessary measures to respect the confidentiality of your personal data subject to appropriate security.

Mobile Vikings 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 Mobile Vikings. 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.

- ◆ **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 Mobile Vikings's rights and property, including the enforcement of our general terms and conditions of use.
- ◆ **Business transfers:** Mobile Vikings 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 Policy.

If you make use of our services through your employer, no information other than your name and telephone number will be shared with your employer. If you form a Viking Clan together with other Vikings, only the Clan members know with whom they form a Clan.

6. Retention period

We will not retain your data longer than necessary for the purpose for which it was collected, in particular in accordance with the legally prescribed retention and limitation periods. In doing so, we take into account the fact that some data must be kept for a certain period of time pursuant to certain legislation.

In concrete terms this means that, as long as you are a customer of ours, we will keep your details for a maximum period of 10 years, with the exception of traffic and location data which, as required by law, we will continually delete as soon as they are 12 months old.

If you are no longer a customer of ours, we will keep your data in our systems for 2 years after your SIM card becomes inactive or your administration rights on an active SIM card are revoked. During this period we will keep your data in case you become a customer again, and we will use them for direct marketing purposes, unless you have already opted out of this.

At the end of that two-year period, your account will be closed and we will archive your identification, contact and payment details, your usage and invoicing details and any other details you have provided to us during your contacts with Mobile Vikings. All this data is kept for up to 10 years after your last payment or top-up, for the purpose of instituting, exercising or substantiating legal claims.

7. What are my rights and how do I exercise them?

The right to data protection is a fundamental right in the European Union. Even when you share data with companies, you must always be able to retain control over your personal data. Below, we list which rights you have, and how you can exercise them at Mobile Vikings.

◆ **Right of access**

You have the right to receive confirmation from Mobile Vikings as to whether or not we process your personal data, to have access to the personal data and how and why they are processed, as well as a copy of the data concerned. You can exercise this right by sending an e-mail to privacy@mobilevikings.be.

◆ **Right to rectification**

You have the right to ask for your data to be rectified if you become aware that we are processing incorrect data about you. You can exercise this right by sending an email to privacy@mobilevikings.be.

◆ **Right to erasure of data**

You have the right to request the erasure of your personal data. This is not an absolute right and is therefore not always applicable (e.g. because we are legally obliged to keep certain data). You can exercise this right by sending an e-mail to privacy@mobilevikings.be.

◆ **Right to restrict processing**

You have the right to have the processing of your personal data restricted in certain specific cases. You can exercise this right by sending an e-mail to privacy@mobilevikings.be.

◆ **Right to data portability**

You have the right to request the data that you have provided to us within the framework of processing that is based on your (explicit) consent or that is strictly necessary for the performance of a contract with you. These will then be provided to you in machine-readable form. You can exercise this right by sending an e-mail to privacy@mobilevikings.be.

◆ **Right to object to processing**

You have the right to object to the processing of your personal data on the basis of our legitimate interest, including profiling, for reasons relating to your specific situation. You can exercise this right by sending an e-mail to privacy@mobilevikings.be.

◆ **Right to object to direct marketing**

You also have the right to object to direct marketing. This right is absolute - it must always be complied with. In certain cases, you can already exercise this right when you share your data with us. In addition, you can always unsubscribe from electronic direct marketing communications via your account settings and via the unsubscribe link in received messages. To exercise your right to object to direct marketing for other channels, please send an e-mail to privacy@mobilevikings.be.

If you no longer wish to receive direct marketing by telephone from any company, you can add your telephone number to the *Do not call me* list (www.dncm.be). If you no longer wish to receive direct marketing by post from any company, please add your details to the Robinson List (www.robinsonlist.be). Mobile Vikings always takes both lists into account in its direct marketing campaigns.

◆ **Right to withdraw consent**

If you have given your consent to certain processing of your data, you can revoke it at any time. Withdrawing permission is always as simple as giving permission: if you gave an opt-in for a newsletter, you can also unsubscribe at any time via your account settings or via an unsubscribe link in every e-mail you receive. If you notice that this is not the case, please notify us immediately via privacy@mobilevikings.be.

◆ **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, Mobile Vikings refers to the Data Protection Authority website:
<https://www.dataprotectionauthority.be/>

8. Automated individual decision-making

In order to prevent fraud and to enforce compliance with our General Terms and Conditions, Mobile Vikings engages in a limited amount of automated individual decision-making. When our systems detect an abnormal or fraudulent use of our services, or detect a use that seriously violates our Terms and Conditions, your number will be automatically blocked and/or your contract with Mobile Vikings may be automatically terminated. You will be informed of this immediately and you will always have the possibility to object to this decision via our customer service department.

9. Amendments to this Privacy Policy

From time to time, this Privacy Policy shall be amended, for example in the context of changes to our services. At such time that the amendments to the Privacy Policy are published, the date of the 'last update' shall be modified at the bottom of the document. In the event of a substantial change, we will notify you in advance (e.g. by sending you a notification via e-mail) and ask for your prior consent when the law requires this.

10. Contact



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

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

Last update: 4 January 2021