

This Privacy Policy takes effect as of 15 September 2022

General

We are committed to protecting your personal data and processing it according to the data protection laws that apply in all countries where Lebara operates.

Lebara's general practices regarding the use of your personal data, including how we collect, use and share it with others, is described in this Privacy Policy.

Personal data is any data that is directly or indirectly traceable to you as an individual, such as your name, email address, phone number or date of birth.

Lebara consists of all business units within the Lebara Group, including Lebara Ltd., Lebara B.V. and its direct and indirect subsidiaries.

What personal data do we process?

We must receive or collect certain data to perform, improve, understand, adapt, support and market our services. This also applies when you request or use our services. The types of data we receive and collect depend on the service you use and how you use it.

We may collect or receive your personal data from you as an individual but also other data that may make you personally identifiable in certain circumstances, for various purposes, such as:

Data you may provide us:	
Data traceable to individuals	Data which can be used to discern your identity, such as your full name, date of birth and gender.
Contact details	Data enabling us to contact you, such as your home address, business/work address, email address or phone number.
Payment and billing details	Data required to process payments made for purchasing services from us, such as your billing address, payment details, bank details and payment card details.

Data we may collect:	
Know Your Customer (KYC) and verification data	Data shared with or obtained from third parties, such as credit rating agencies, fraud prevention agencies, commercially available directories and public sources.
Operating, device and technical data	Information about your usage activities within our services and our websites, such as your settings, communications, online searches, browser type and language, browser history, websites visited,

	location data, use of mobile applications, type of mobile device, data consumed, IP address, page views, mouse clicks, access times, addresses of affiliated websites and your computer's operating system.
Management of your account(s)	Data on customer service communications, top-up history, call and SMS history, transcripts of live chats, your preferences and interests.
Cookies and other site data	Cookies and similar site data used to operate our websites and deliver our online services, also to improve your experience, understand how our services are used, customise our services and remember your choices, such as your language preferences or locations. We may also use cookies to display relevant content related to our services.

For what purposes do we process personal data and on what legal basis?

We only process personal data if there is a valid legal basis for doing so. We use your data to provide our services that you have requested, in particular:

- a) to contact you when necessary;
- b) to fulfil orders, transactions or agreements you enter into with us, and to process payments you make;
- c) to verify your identity and whether you are an authorised user of our services;
- d) to help prevent crime and fraud;
- e) to generate anonymised market reports and statistical analyses;
- f) to send alerts and notifications;
- g) to inform you about updates and new features of our services and about new services we offer.

We may also use your personal data in connection with marketing, improvement or development of our products or services, for safety and security reasons, or legal requirements other than those related to your agreement or request. We do this based on our legitimate interest or that of a third party, or with your consent.

Cookies and other site data

We collect data based on your visits to our websites and your use of our services to help us collect statistics on usage and effectiveness, personalise your experience, customise our interactions with you and improve our products and services. We do this by using various technologies, such as scripts, tags, Local Shared Objects (Flash cookies), Local Storage (HTML5) beacons and cookies.

We have entered into a processor agreement with the parties who supply these services to ensure that personal data is only used to provide us with insight into how our website is used.

A cookie is a piece of information that a website may send to your browser, which may then be stored on your computer as a tag identifying your computer. While cookies are often only used to measure usage (such as number of visits and length of visits) and effectiveness of the website and to enhance ease of navigation or use, and are therefore not linked to personal data, they are also sometimes used to personalise the experience of a known website visitor by linking to profile information or user preferences. Over time, this information provides valuable insights to help improve the user experience.

Cookies are generally divided into 'session cookies' and 'persistent cookies'. Session cookies help you navigate the website efficiently and track your progress from page to page, so you are not prompted to provide information you have already provided during the current visit, or for data required to complete a transaction. Session cookies are stored in temporary memory and deleted when the web browser is closed. Persistent (or permanent) cookies, on the other hand, store user preferences for the current visit and for subsequent visits. They are written to your device's hard drive and still work when you restart your browser. For example, we use persistent cookies to record your choice of language and country of residence.

When you visit our websites or online services, you may be able to set your preferences regarding cookies and other similar site data. You do this by using the options provided to you by your web browser or by Lebara. If a cookie manager has been implemented by Lebara, it will be displayed on your first visit to our website. Using cookie preferences does not result in deletion of cookies already on your device. You can always change your cookie settings, including deleting cookies already on your device or in your web browser (usually via the 'Settings' or 'Preferences' menu). Please note that if you disable cookies in your browser or device settings, some of our services may not work properly.

Marketing data

We would like to send you information about products and services from us and other companies within the Lebara Group that you may be interested in. Some information may be personalised for you based on the data received about you and your preferences. This allows us to ensure the best customer experience and adequate, efficient marketing. If you have consented to receiving marketing material, you can always unsubscribe later. You have the right at any time to let us know that we should no longer contact you for marketing purposes or provide any of your data to other members of the Lebara Group.

If you no longer wish to be contacted for marketing purposes, you can always change your preferences within your account under 'MyLebara' on our website. You can also contact our customer service [here](#), or unsubscribe by clicking the unsubscribe link or following the instructions in any marketing email or text message we send you. Please note that although an unsubscribe request is processed immediately, it may take up to 48 hours for it to take effect.

Sharing of personal data

As an international company, we may share data about you with our subsidiaries around the world and transfer that data worldwide to countries where we do business in accordance with this Privacy

Policy. In the case of subsidiaries in which Lebara has a controlling interest, we only grant access to personal data where it is genuinely necessary for the purposes for which the access is granted.

In some cases, Lebara uses suppliers and business partners located in different countries to collect, use, analyse and otherwise process personal data on our behalf.

Where applicable, Lebara may also share your personal data with selected suppliers and business partners to help us provide you with products or services or to fulfil your requests.

We share your personal data with third parties who help us provide our services to you. These services include processing payments or running targeted marketing campaigns and improving and personalising your online experience. Personal data is only made available to third parties where such data is necessary for the third party to perform the relevant services. Any time that third parties process your personal data to support us in providing our service to you, they are acting as data processors for Lebara, and Lebara has taken the required technical and organisational measures (including entering into a processor agreement with these third parties) to ensure that your data is processed exclusively for the purposes mentioned above. The legal basis for this transfer to third parties acting as data processors is Lebara's legitimate interest in being able to outsource certain business activities.

Only with your consent, Lebara may share your personal data with third parties that are not data processors of Lebara.

If Lebara decides to sell, buy, merge or otherwise reorganise business activities in a country, personal data may be provided to potential or actual buyers in such a transaction or such data may be received from sellers. Lebara will require appropriate protection of personal data in such transactions.

Please note that in certain circumstances personal data must be disclosed to government agencies and authorities pursuant to court actions, orders or proceedings. These include tax authorities, investigation services and regulators in the telecom market (Personal Data Authority and the Telecoms Agency) and financial market (Financial Markets Authority).

We may also share personal data about you to protect the rights or property of Lebara, our business partners, suppliers and customers and others, if we have reasonable grounds to believe that such rights or property have been or may be affected.

International transfer of personal data

Due to the international nature of Lebara, certain personal data is transferred between different subsidiaries and to third parties in the countries where we do business.

If the provision of our services requires us to transfer your personal data to a country outside the European Economic Area, we will only do so with an adequate level of protection of your fundamental rights as a data subject, ensuring that the protection of your personal data is sufficiently guaranteed and performed in accordance with the EU General Data Protection Regulation (GDPR).

We ensure that all subsidiaries and business partners outside the EEA process your personal data in accordance with this Privacy Policy. Where appropriate, Lebara implements model contractual clauses approved by the EU Commission or similar contractual clauses in other jurisdictions.

Number masking

By default, your number is visible on the screen of the person you are calling. If you do not want this to happen, you can enable number masking. You can read how to do this [here](#). After that, your number will not be visible on the phone of the person you are calling.

When you dial 112, number masking does not work. Even if you have masked your number, your details are still passed on to 112 as required by law.

Telephone harassment

If you are being harassed by phone, you can ask us to investigate this. To do so, please contact our Customer Service: [1200](#) or [+31619001200](#)

If the person harassing you is a Lebara customer, we will ask them to stop. If they are a customer of another provider, we will ask their provider to contact them and ask them to stop. If the person continues to harass you after that, Lebara may be legally obliged, at your request, to report the harasser's name, address and address (home or business) to the police. The harasser will be informed of this in advance. If you harass someone by telephone, then the person you are harassing may report this to Lebara. In that case, we will handle this according to the procedure described above.

How safe is your personal data?

We do our best to protect your personal data and maintain its accuracy. Lebara takes suitable physical, administrative and technical security measures to protect your personal data from unauthorised access, use and disclosure. For example, we encrypt certain sensitive personal information, such as credit card information, when transmitting it over the internet. We also require our suppliers to protect such information from unauthorised access, use and disclosure.

We also store your personal data in restricted-access computer systems which are located in fully secured, restricted-access facilities. Lebara applies various technical and organisational measures like these to protect your personal data against destruction, loss, alteration or unauthorised disclosure or access.

If you have taken out a mobile phone subscription with us, you have received a SIM card protected by a PIN code and a PUK code. These codes ensure that unauthorised persons cannot access the information you have stored on your phone or use your subscription. It is your responsibility to keep the codes secret.

Our employees and others who work for us are obligated to strict confidentiality and must comply with our instructions intended to adequately protect your data.

Please note that communication via the internet is not always secure, even when encrypted. We are not responsible for unauthorised access to or loss of personal data if this is beyond our control.

You are responsible for the security of your personal data, such as your login data or your personal data that you share with us over the internet.

Despite our efforts, there always remains a risk of a lapse in protection of your personal data,

resulting in a data leak. In the event that this happens, we will report the incident to the Personal Data Authority.

How long do we store your personal data?

We do not retain personal data for longer than necessary to fulfil the purposes for which it is processed, including providing our services to you, ensuring the security of our processing complies with the obligations of laws and regulations (e.g., audits, records and legal retention periods), dealing with disputes and for asserting, exercising or defending legal claims.

Data required for our accounting purposes will be stored for seven years.

Your privacy rights

Personal data protection legislation (the GDPR) grants you the following rights as a data subject:

- (i) the right to request whether data about you is being processed and, if so, to access it;
- (ii) the right to request rectification and erasure of that data;
- (iii) the right to object to processing or request restriction of processing;
- (iv) the right to withdraw consent to processing, if the processing is based on your consent;
- (v) the right to receive or deliver your data to an organisation designated by you, in a structured, conventional and machine-readable form;
- (vi) depending on your country of residence, the right to lodge a complaint with a data protection supervisory authority. In the Netherlands, this is the Personal Data Authority in The Hague (www.autoriteitpersoonsgegevens.nl).

Please note that the rights granted to you may be limited or superseded by applicable law and Lebara's obligations under laws and regulations. Some personal data is also needed to provide our services to you.

Depending on the service you use, you can change some of your personal data within your account under 'My Lebara' on our website and, in case of mobile Lebara applications, in the application settings.

Requests should be sent to DPO@Lebara.com. [We will assess your requests in accordance with the GDPR.](#)

Data pertaining to underage minors

Unless otherwise indicated, our websites, products and services are not intended for use by children. We do not knowingly collect personal data from users under the age of 16.

All personal data of a child under 16 years of age may only be provided to us with the consent of their parent or guardian.

Links to third-party websites

To enable you to interact with other non-Lebara websites on which you may have an account (such as social media sites), we may provide you with links or embed third-party applications that allow you to register, log in or post content from our websites.

Your use of these links and applications is subject to the privacy policies of third parties. Please familiarise yourself with the privacy policies of the third-party websites before using the links or applications. Lebara is not responsible for the privacy policies or the content of these other websites.

The right to file a complaint

If you feel that our processing of your personal data does not comply with applicable data protection laws, you have the right to file a complaint:

- Directly to Lebara by sending an email to: DPO@Lebara.com
- For residents of the Netherlands, by contacting the Personal Data Authority in The Hague (www.autoriteitpersoonsgegevens.nl).
- For residents of other EU countries, by contacting the competent data protection authority in your country. The names and contact details of the data protection authorities of EU countries other than the Netherlands can be found [here](#).

Changes to our Privacy Policy

We may update this Privacy Policy in the future. When we make changes, we will update the date that appears at the top of this Privacy Policy. If we make significant changes to the Privacy Policy that affect your rights, we will notify you with a service notification in your account, on our website or by sending an email to your primary email address, and as otherwise required by applicable law.

Contact us

Questions about this Privacy Policy or Lebara's handling of your personal data can be directed to the Lebara Group Data Protection Officer via our customer service portal. Please send an email to: DPO@Lebara.com

Or contact us in writing:

Lebara DPO
Import Building 7th Floor, 2 Clove Crescent
London E14 2BE
United Kingdom