

1. General Information

- 1.1. We are Wireless Logic Limited registered in the UK (03880663) and located at Horizon, Honey Lane, Hurley, Berkshire, SL6 6RJ, UK. We provide M2M (Machine to Machine) and IoT (Internet of Things) services to the UK, EU and global markets.
- 1.2. If you have any questions about this Privacy Policy or want to exercise your rights set out in this Privacy Policy, please contact our Group Data Protection Officer at:
 - (GDPR@wirelesslogic.com)
 - (+44 (0) 330 056 0330)

We recognise that as an international business, some of our customers may be resident in jurisdictions other than the UK. In certain circumstances, local laws of these jurisdictions, may by way of their application, afford rights to individuals in respect of the personal data that they provide to us. Wireless Logic consider that the rights set out in this Policy also provide you with such protection in relation to your personal information. As the UK has left the EU, we have appointed representatives in each of our European entities to act as local representatives for customers based in those territories. If you are based in the EU, please continue to contact us at GDPR@wirelesslogic.com in the first instance.

- 1.3. This privacy notice discloses the privacy practices for Wireless Logic Limited. This privacy notice applies to information collected by websites, platforms and other systems that we operate including SIMPro, BillPro, comesconnected.com and wirelesslogic.com, as well as information supplied to us through the course of normal business via other channels.

It will notify you of the following:

- What personally identifiable information is collected from you through the website or other electronic means, how it is used and with whom it may be shared.
- What choices are available to you regarding the use of your data.
- The security procedures in place to protect the misuse of your information.
- How you can correct any inaccuracies in the information.

- 1.4. Unless we've said otherwise in this privacy notice, Wireless Logic will be the "data controller" of your personal data. We determine the means and purposes for processing your personal data. We only have access to/collect information that you voluntarily give us via email, post, fax or other direct contact from you. We will not sell or rent this information to anyone.
 - We will use your information to respond to you, regarding the reason you contacted us.
 - We will not share your information with any third party outside of our organization, other than as necessary to fulfil your request, e.g. to supply a service

- Unless you have opted-out of marketing then we may contact you via email in the future to tell you about special events, new products or services, or changes to this privacy policy.

1.5 By accessing, browsing or otherwise using the website, platforms and other systems that we operate and services we provide, you confirm that you have read and understood this privacy notice. Please ensure you have read it carefully, and particularly the section detailing your rights in relation to the personal data that we collect about you at section 2.

1.6 **Changes to our privacy notice**

We may change this privacy notice from time to time, to reflect how we are processing your personal information. If we make significant changes, we will highlight the sections of the privacy policy that have been updated to allow you to review the changes.

This privacy notice was last updated on the 4 March 2022.

2. **Personal data**

2.1. Personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

2.2. **How we use your information**

This privacy notice tells you how we, Wireless Logic, will collect and use your personal data.

2.3. **Why does Wireless Logic need to collect and store personal data?**

In order for us to perform our contract with you and provide you with a service we need to collect personal data for correspondence purposes and/or detailed service provision. In any event, we are committed to ensuring that the information we collect, and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

2.4. **Will Wireless Logic share my personal data with anyone else?**

We may pass your personal data on to third-party service providers contracted to Wireless Logic in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Wireless Logic’s procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

2.5. **How will Wireless Logic use the personal data it collects about me?**

Wireless Logic will process (collect, store and use) the information you provide in a manner compatible with the applicable data protection laws, including the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (GDPR); the Data Protection Act 2018 (and regulations made thereunder) and the Privacy and Electronic Communications Regulations 2003. We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Wireless Logic is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

In some circumstances we also need to provide your information to enable us to comply with legal or regulatory requirements, such as criminal or whistleblowing investigations or in response to a request for information under the Investigatory Powers Act 2016. We will do this where Wireless Logic has a legal obligation to provide such personal information to the authorities and regulators to comply with the law.

2.6. **Under what circumstances will Wireless Logic contact me?**

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

2.7. **Can I find out the personal data that the organisation holds about me?**

- Wireless Logic at your request, can confirm what information we hold about you and how it is processed. If Wireless Logic does hold personal data about you, you can request the following information: Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Wireless Logic or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information. Please see section 8 of this privacy notice for more information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.

- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

2.8. **What forms of ID will I need to provide in order to access this?**

If we cannot easily identify you from the personal data, you have provided when making the request, we will ask you to provide further ID to ensure we only disclose personal data to those entitled to it.

For customers of Wireless Logic, the following identification will be required depending on your method of contacting us:

- For calls, customers would need to confirm a minimum of 4 characters from their billing account password (found on SIMPro) to obtain information regarding their SIMs/account.
- Emails are validated by an approved email domain on either the account or authorised contacts.
- Chats are validated by accessing through SIMPro.

For individual personal data requests, Wireless Logic accepts any one of the following forms of ID:

- Passport
- Driving licence
- Birth Certificate
- Utility bill (from last 3 months)

3. Information Collection, Use and Sharing

- 3.1. In order to use our services and websites, a user might be required to first complete a registration form. During registration a user is required to give certain information (such as name, email address and mobile telephone number). This information is used for the following purposes:
- Contact you about the products/services on our site in which you have expressed interest
 - Authenticate you when accessing information.
- 3.2. We may request information from you in connection with an order with us for products or services. To buy from us, you must provide contact information (like name and shipping address) and financial information (like credit card number, expiration date, bank account details). This information is used for billing purposes and to fulfil your orders. If we have trouble processing an order, we'll use this information to contact you.
- 3.3. At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:
- Right of information – you have the right to be informed about what we do with the information we hold on you – this Privacy Policy and any details provided when we captured your personal data will keep you informed about how we will use this information.
 - Right of access – you have the right to request a copy of the information that we hold about you (please see section 2.7 above). In the event that Wireless Logic refuses your request under rights of access, we will provide you with a reason as to why.
 - Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
 - Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
 - Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
 - Right of portability – you have the right to have the data we hold about you transferred to another organisation.
 - Right to object – you have the right to object to certain types of processing such as direct marketing.
 - Right to object to automated processing, including profiling.

All of the above requests will be forwarded on should there be a third party involved (as stated in section 2.4 above) in the processing of your personal data.

3.4. Information we collect and process from you is as follows:

<p>Cookies</p>	<p>We use "cookies" on our websites and applications. A cookie is a piece of data stored on a site visitor's hard drive to help us improve your access to our site and identify repeat visitors to our site.</p> <p>For instance, when we use a cookie to identify you, you would not have to log in a password more than once, thereby saving time while on our site. Cookies can also enable us to track and target the interests of our users to enhance the experience on our site. Usage of a cookie is in no way linked to any personally identifiable information on our site.</p>
<p>Heat Mapping</p>	<p>We use Hotjar to help us understand our users' needs and to optimise this service and experience. Hotjar is a technology service that enables us to build and maintain our service via user experience feedback (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.). Hotjar uses cookies and other technologies to collect data on our users' behaviour and their devices (in particular the IP address (captured and stored but only anonymously), device screen size, device type, browser information, geographic location (country only), preferred language used to display on our website. Hotjar stores this information in a pseudo user profile. Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar's privacy policy by clicking on this link.</p> <p>You can opt-out from the creation of a user profile, Hotjar's storing of data about your usage of our site and Hotjar's use of tracking cookies on other websites by following this opt-out link.</p>
<p>Sharing</p>	<p>We share aggregated demographic information with our partners and advertisers. This is not linked to any personal information that can identify any individual person.</p> <p>We sometimes use outside companies to ship orders, perform credit checks, process payment and bill users for goods and services. These companies do not retain, share, store or use personally identifiable information for any secondary purposes beyond filling your order.</p> <p>We may partner with other parties to provide specific services connected with your order.</p> <p>When the user signs up for these services, we will share names, or other contact information that is necessary for the third party to provide these services. These parties are not allowed to use personally identifiable information except for the purpose of providing these services.</p>
<p>Links</p>	<p>This website contains links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.</p>

4. Consent and Legitimate Interests

- 4.1 Consent is required for Wireless Logic to process certain types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data, we will always tell you why and how the information will be used.
- 4.2. You may withdraw consent or ask us about the data we store at any time by contacting us via the GDPR email address above or phone number given on our website.
- 4.3 Where Wireless Logic are relying on our legitimate interests to process your information, you have the right to object to us doing this in light of your individual circumstances. We will review this objection and, unless we consider that our legitimate interests override your rights, we will stop processing your information in this way. Please see the right to object to, or restrict, Wireless Logic using your information in section 3.3 above.

5. Disclosure

- 5.1. Wireless Logic will not pass on your personal data to third parties without first obtaining your consent or through the lawful, legitimate processing of your data in connection with the services we provide to you in order to perform our contract or in our legitimate interests.
- 5.2. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities. More detail about the specific parties and the data they receive can be requested from Wireless Logic using the contact details above.
 - 5.2.1. Mobile network operators who give access to their radio and data network.
 - 5.2.2. Financial institutions and banks to process payments.
 - 5.2.3. Internet service providers who provide access to data networks.
 - 5.2.4. Infrastructure partner who provide data location facilities.

6. Retention period

- 6.1 Wireless Logic will process personal data for as long as we are contracted to provide services to you and will store any personal data for up to 12 months thereafter. We will keep limited personal data about you for legislative and regulatory needs for up to 6 (six) years.

7. Transferring data internationally

- 7.1 In order to provide our goods and services we may need to transfer your information from your country of residence to another country in the usual course of our business. By dealing with us and submitting your personal information, you agree to the transfer, storage, and/or processing of your personal information outside of your country of residence as set out below.

- 7.2 Wireless Logic only transfers personal data to those third parties where we can be sure that we can protect data subjects' privacy and rights, for example where the third party is located in a country deemed to have adequate data protection laws in place, or where we have a contract in place with that third party, including the European Commission's standard data protection clauses. We also conduct data transfer impact assessments to ensure that, where a third party is located in a country whose local laws may cause a risk of undermining data protection rights, that appropriate technical, organisational or contractual supplementary measures are in place with that third party.
- 7.3 Now that the UK has left the EU, the UK has become a 'third country' for data protection transfers from the European Economic Area ('EEA') under the GDPR. However, the EU Commission announced on 28 June 2021 that adequacy decisions for the UK have been approved to allow the continued free flow of personal data from the EEA to the UK. For data transfers from the UK, there are currently no changes to the way personal data is sent to the EU/EEA and other countries deemed adequate by the EU. The UK government has stated their commitment to maintaining the high standards of the GDPR (General Data Protection Regulation) and the GDPR has been retained in UK law alongside the existing Data Protection Act 2018.

8. Complaints

- 8.1 In the event that you wish to make a complaint about how your personal data is being processed by Wireless Logic (or third parties as described in 2.4 above), or how your complaint has been handled, you may contact Wireless Logic's Data Protection Officer / GDPR Owner using the contact details in the first section of this Policy.
- 8.2 You also have the right to lodge a complaint directly with your relevant supervisory authority. In the UK this is the Information Commissioner's Office (ico.org.uk), which we consider the lead supervisory authority for our business. If you have a complaint with one of our EU entities, then the relevant EEA lead supervisory authority will be the appropriate authority to contact.