

PRIVACY POLICY

What is a privacy policy?

At Enwere B.V we are committed to the privacy and securing of the data we hold about you. Throughout the data collection process, all necessary steps are taken to ensure that data is used only for the purposes we clearly state. The data that we collect will depend on the service we provide to you.

This Privacy Statement is designed to assist you in understanding how Enwere B.V uses and safeguards the information you provide to us in using Enwere B.V's Services. You should read this policy along with the terms and conditions of the other services we provide to you.

This policy applies in respect of all Enwere B.V entities.

"Enwere B.V" when used in this document shall be taken to refer to the Enwere B.V entity which is relevant to the provision of the services which you are using or the country in which you reside.

1. Purposes for which information is collected

All data collected by Enwere B.V for and through the use of the Service adhere to the following General Data Protection Regulation [2016/679] from the 25 May 2018.

1.1. Data is collected and may be used for three main purposes. Enwere B.V collects and processes, or has third party service providers who collect and process on Enwere B.V's behalf, personal data relating to You, as permitted in order to (1) provide the Enwere B.V Service, in particular to convey the communications you make by means of the Enwere B.V Software and/or the Enwere B.V Service and Enwere B.V network, (2) invoice you for your use of the Enwere B.V Service and (3) carry out Enwere B.V marketing activities.

1.2. This implies that we may from time to time send you information about services and products in which we believe you may be interested. In accordance with the Data Protection Act 1998 you must actively give your consent for this at the time the information is collected. We will not use your information if this consent is not given.

2. What is personal data?

2.1. In order to provide you with a service, we need to have certain information about you. Personal data means the facts we collect about you when you sign up to the Service, when you access Services from the website or your mobile phone, and when you use these Services.

3. What information do we hold about you?

3.1. When you sign up to the Service we will ask you (where appropriate) for your name, address, payment method and details, mobile phone number and email address. We also hold data about which of our services you have used, and when. This will include call times, routing and durations which are known as "traffic data". Finally, we also hold data about how you found out about our services, and how you interact with us through our marketing activities, campaigns we run, calls we make, and emails we send. We use this data to improve our marketing activities.

3.2. Under certain circumstances for regulatory purposes in some countries in order to provide the Enwere B.V Services we may require copies of personal documentation (Passport, ID document, etc) from you which will be held by us and made available to national regulators if they so request.

4. What do we use it for?

We need this information so that we can confirm your identity and process your order when you first sign up for our Service. We may also use Your personal data for the following:

4.1 Regulatory Compliance

We may use your personal data for the purposes of meeting our regulatory

obligations, and in some cases we will need to share this data with regulators; for example in the event of you making a complaint.

4.2 Credit Referencing

We may use your personal data for the purposes of undertaking credit reference searches and analysing credit worthiness during the term of this Agreement.

4.3 Marketing activities

If you have requested information regarding our product and services we will attempt to contact you via phone and email regarding the specific product that you have enquired about. Should we receive no further contact from you we will delete your data after a period of 12 months.

If you have consented to the use of personal data for marketing purposes then we may use your personal data to send you information about additional services that we provide.

4.4 Collecting traffic data

We may hold Data about the numbers and lengths of calls, SMS sent, and network usage made in order to bill you for your services. We will also, for a short period of time, hold data in relation to the websites, and IP addresses that your devices have used.

5. What are cookies and how do we use them?

Cookies are pieces of information that Enwere B.V will transfer to your computer's hard drive through your browser to enable Enwere B.V's systems to recognise your browser. Cookies also enable Enwere B.V to gather information about the use of its website and to enhance the website accordingly to the preferences of the users. The Help option on the toolbar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Enwere B.V's cookies do not contain any identifying information. Please bear in mind that some personalised services may not be available if you choose to disable cookies.

6. Who else will see my information?

6.1 Transactions for Billing

We may use third party banking facilities and billing agencies to process your information. Third party network operators may also need access to your Data for regulatory compliance purposes. We will ensure that such agencies conform to the same or similar guidelines as we do.

6.2 Compliance with Laws

Sometimes we may have to provide your personal data to third parties to comply with legal obligations. These include, but are not limited to, national regulators, for reasons such as resolving a billing dispute, for use in legal proceedings or even national security. In these cases we will comply with whatever laws are in force at the time and provide such information as is required.

6.3 Emergency Services

If we provide you with Access to Emergency Services then we will provide all the necessary information to the Emergency Services that they require.

6.4 Providing a directory enquires service

Unless you and/or your company have asked us not to enter your details into a directory services, we may enter your Enwere B.V number into Enwere B.V and third party directories, and our network will allow the display of your number on receiving devices. You have the option to opt out of these services.

Note that where Enwere B.V provides You with Access to Emergencies Services, Your number and location of your device will always be sent if you are calling the emergency services.

6.5 Information Storage

Information collected on the Website or by using the Service may be stored and processed in any country in which Enwere B.V maintains facilities. In this regard, or for purposes of sharing or disclosing data in accordance with this policy, Enwere B.V reserves the right to transfer information outside of your designated

home country. The table below outlines how we transfer your data between our subsidiaries and partners.

By using the Enwere B.V Service You consent to any such transfer of information outside of your designated home country. Enwere B.V may sell or buy subsidiary companies or business units. In such transactions as well as in the event Enwere B.V or substantially all of its assets are acquired by a third party, personal information of Enwere B.V users will generally be one of the business assets transferred. We reserve the right to include your personal information, collected as an asset, in any such transfer to a third party.

7. How long will we hold your data?

There are strict obligations which define for how long we may hold personal data about you. These obligations are included in data protection and data retention legislation. We will hold your personal data as outlined in the table below:

8. Can I see the data you hold about me, have it changed or removed?

Yes. You may ask to for a copy the personal data we hold on you, have it changed or have all personal data removed by sending a letter to the Data Controller, Enwere B.V, Willem Dreeslaan 47, 2729ND, Zoetermeer. Alternatively, you can email your request to dataprotection@enwere.com. Please outline your request and we will respond initially within 5 days to confirm we can process your request, and then complete the request within 30 days.

9. What to do if you suspect we have shared your data incorrectly?

If you suspect that we have shared your data inappropriately then please email: securitynotice@Enwere B.V.com or call our helpdesk providing us details of the issue and we will investigate immediately.

10. How does Enwere B.V protect your personal information?

10.1 Enwere B.V takes appropriate organisational and technical measures to protect the personal data and traffic data provided to it or collected by it, and does not retain it any longer than permitted in order to perform its services or as required under relevant legislation. Your personal data and traffic data can

only be accessed by authorised employees of Enwere B.V who need to access to these data in order to be able to fulfil their given duties.

10.2 Enwere B.V takes appropriate technical measures to manage its Information Security policy and processes and is accredited with ISO:27001 covering its operations in the UK, Portugal and the Philippines.

10.3 Enwere B.V takes appropriate technical measures to protect the confidentiality of the communications content via its Enwere B.V services, and observes applicable obligations and exceptions under the relevant legislation.

11. Will this policy change?

This privacy policy may change from time to time for either legal or business reasons. In particular, you should check this Policy regularly for compliance purposes. If any changes are made a revised privacy policy will be published at www.enwere.com/privacy-policy.