

## Privacy Policy

This Privacy Policy describes policies and practices of China Mobile International Limited ("CMI") and our subsidiary, China Mobile International (UK) Limited ("CMIUK"), in the collection, use, disclosure and transmission of your personal information in relation to below products and services:

- (i) CMLink pay-as-you-go SIM cards; and
- (ii) CMLink Data Growth Packs

(collectively "CMLink Products")

CMI and CMIUK ("we", "us" or "our") strive to comply with applicable data protection and privacy legislation and regulations ("Applicable Laws"), that may include, without limitation, the Personal Data (Privacy) Ordinance (Cap. 486) of the Laws of Hong Kong Special Administrative Region (the "PDPO") and the Data Privacy Act 2018 of United Kingdom (the "DPA") and the Regulation (EU) 2016/679 (General Data Protection Regulation) ("GDPR"). CMIUK is registered as a data controller with the Information Commissioner's Office of United Kingdom. This website is operated by CMI. To the maximum extent permitted by Applicable Laws, and subject to your valid consent where required by Applicable Laws, your continued use of this website and/or CMLink Products after notice shall constitute your acceptance of this Privacy Policy. We may occasionally update this Privacy Policy to reflect changes in our software and/or products and customer feedback, or changes of Applicable Laws. When we post changes to this Privacy Policy, we will update the "last revised" date at the bottom of the Privacy Policy. Please read this Privacy Policy through and come back regularly.

This Privacy Policy may be translated into other languages for reference purpose. If there is any inconsistency or conflict between the English version and other versions of this Privacy Policy, the English version shall always prevail.

### **Personal information we collect**

1. In order to provide products or services, we may collect information about you from time to time, including (but not limited to) information in the following categories:
  - (a) Identification data (e.g. name, address, telephone number, mobile number);
  - (b) Electronic identification data (e.g. IP addresses, cookies);
  - (c) Information about your usage of and interaction with our mobile applications, computer programs, software, products, and websites (including computer, platform, device and connection information, client performance information, error reports, device capability, bandwidth, statistics on page views, browser type and usage statistics);
  - (d) Traffic data (data processed for the purpose of the conveyance of communications or the billing);
  - (e) Payment details, including the credit card and bank information;
  - (f) Contact details, including contact person name, telephone number, fax number or email address etc.

You are not obliged to supply to us your personal data, however, we may be unable to provide you with the required goods and services if we do not have certain types of personal data from you.

In order to enhance your customer experience, further personal data may also be collected on a voluntary basis such as your age, date of birth, gender, education, profession, salary range, hobbies, interests and leisure activities, other related products and services subscribed, family and household demographics, and etc. We will indicate in the relevant forms or application whether the provision of the required personal data is on a voluntary basis.

In addition, your online session data may also be collected indirectly on an aggregated and anonymous basis.

If you are under the age of 13, you are required to ask your parent or guardian before providing any personal data to us.

### **Use of your personal information**

2. Our primary purpose in collecting information is to provide you with a safe, smooth, efficient, and customized experience. Subject to your valid consent, we collect and use, or have third party service providers acting on behalf of us collecting and using, personal data relating to you, as permitted or necessary to:
  - provide you with phone, internet communication, and/or other products ;
  - take, process or deliver orders made via our websites, invoice you or notify you of the status of your order;
  - provide other services for you (as described when we collect the information);
  - administer, operate and manage loyalty programs;
  - communicate with you by email, phone, mail or other means;
  - process payment instructions, billing and refund;
  - provide you with customer support and troubleshoot problems;
  - compare information for accuracy;
  - inform you about service updates and faults;
  - request feedback or participation in on-line surveys;
  - handle enquiries, complaints and feedbacks;
  - resolve disputes;
  - verify your identity;
  - conduct internal research;
  - design and improve CMLink's products, software and websites;
  - plan and carry out CMLink's marketing or promotional operations/offers and similar events;
  - offer certain free of charge CMLink software, features and websites, through the support of advertising;
  - process debt recovery and credit checking;
  - obtain legal advice and establish legal claims or defences and in legal proceedings;
  - protect your, CMI's and CMIUK's interests, including in particular to enforce our Terms and Conditions and prevent and fight against fraud, (together, the Purposes).

### **Disclosure and transfer of your personal information**

3. Except as provided below, we will not sell, rent, trade or otherwise transfer any personal and/or traffic data or communications without your explicit permission, unless it is obliged to do so under applicable laws or by order of the competent authorities.

In order to facilitate the purposes set out in paragraph 2, we may disclose personal information to:

- communicate with telecommunications network operators, CMI's or CMIUK's third party reward and loyalty program providers, agents, dealers, contractors, suppliers, professional advisers, any financial institutions, charge or credit card issuing companies, credit providers, credit information or reference bureaus, or collection agencies, security agencies;
- respond to legal requirements, exercise our legal rights or defend against legal claims;
- protect CMI's and CMIUK's interests, fight against fraud and to enforce our policies or to protect anyone's rights, property, or safety.

CMI, CMI's partner, CMIUK, CMIUK's partner, or the operator or company facilitating your communication may provide personal data, communications content and/or traffic data to an appropriate judicial, law enforcement or government authority or other organizations lawfully requesting such information. CMI and/or CMIUK will provide reasonable assistance and information to fulfill this request and you hereby consent to such disclosure.

Subject to your valid consent, CMI and/or CMIUK may give your information to other company located outside Hong Kong or United Kingdom, which may be a supplier or CMI's affiliate company, for the provision of CMI's and/or CMI's affiliate company's services.

### Security and retention of your personal information

4. We keep your personal information while you are our customer or after you have stopped to use the service, but only when necessary or as required by Applicable Laws. We will take appropriate organizational and technical measures to protect the personal data and traffic data provided to it or collected by it with due observance of the applicable obligations and exceptions under the relevant legislation. Your personal and traffic data can only be accessed by authorized employees or third parties, and will only be retained for as long as is necessary to fulfil the original or directly related purposes for which it was collected, unless the personal and traffic data is also retained to satisfy any Applicable Laws or contractual obligations.
5. Our headquarters, which serves as Data Processor for the purpose of GDPR, is located outside EU. To allow the provision of CMLink Products to you, we require your approval of the transfer of your certain personal data to us:

Company Name	Company Address	Remark
China Mobile International Limited	Level 30, Tower 1, Kowloon Commerce Centre, No. 51 Kwai Cheong Road, Kwai Chung, New Territories, Hong Kong	Data may be processed in Hong Kong and/or China.

### Direct marketing

6. Subject to your valid consent and in strict accordance with the Applicable Laws, CMI (and CMIUK as applicable) intends to use your personal data to deliver to you information about any goods and services, loyalty programs, activities (including joint collaboration with third parties), newsletters, contests, lucky draws and etc of us and our business partners. The said information may include various classes of marketing subjects including but not limited to mobile devices and accessories, network services such as TV, mobile voice, SMS and data communications, IDD/roaming, Internet connectivity, mobile applications, entertainment and data communications on Internet, other value-added services, as well as computer peripheral, accessories and software (including notebooks, handsets, keyboards, security installations and mobile applications), secretarial services, personal assistance services and information services, gaming, sports, music, beauty products, electronics, technology, ecommerce, mobile payment, travelling, banking, investment, entertainment, transportation, household, fashion, food and beverages, insurance, education, health and wellness, social networking, charity activities, media and high-end

consumer products and services. The said information may be delivered to you by mail, phone, email, fax or other means.

CMI and CMIUK may not use your personal data for direct marketing unless CMI or CMIUK received your valid consent in accordance with Applicable Laws. If you wish to stop receiving direct marketing materials from us, you may write to us any time. In any such request, please state clearly your personal information and contact details for identification purposes.

### **Use of cookies and location data**

7. If you visit any of our websites, CMI may use cookie files to store and track information about you and your preferences. A cookie is a small text file that our website transfers to your device. It allows us to better serve you and/or maintain your information across multiple pages within or across one or more sessions. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in future. Cookies contain information about you and your preferences. For example, if you inquire about rates and availability, the site might create a cookie that contains the details you entered. Or it might only contain a record of which pages within the site you visited to help the site customize the view for you the next time you visit. Only the information that you provide or the choices you make while visiting a website can be stored in a cookie. For example, the site cannot determine your email address unless you choose to type it. Allowing a website to create a cookie does not give that or any other site access to the rest of your device, and only the site that created the cookie can read it.

CMI may use your location data to keep track of your activity patterns and preferences in order to improve the level of service you receive. Your location data may be combined with other information CMI receives from third parties to provide you with better service and, where you have consented to receive direct marketing, CMI may provide you with targeted advertisements, content, features, deals and offers.

### **Data access or correction**

8. You have the right to access and, where relevant, to correct your personal information held by us. CMI and/or CMIUK will respond to requests to access, correct or remove your personal information within a reasonable period of time and upon verification of your identity.

We will use all reasonable endeavours to accommodate requests to delete personal information unless it is required to be retained by law or for lawful business purposes.

In accordance with the Applicable Laws, we reserve the right to charge a reasonable fee for the processing of any data access request.

### **Access by phone**

9. When you use CMLink on your phone, CMI may use notification services available for that phone to let you know of any information when you are not actively running or using the CMLink application. These services may be provided by a third party. For example, messages sent to an Apple device will use Apple's Push Notification Services.

Notification services may receive information about the caller, sender of the message and the content of the message as part of providing the service and may use the information in accordance with the terms and conditions and privacy policy for the service provider. CMLink is not responsible for the data collected by third party notification services.

*(Apple is a trademark of Apple Inc., registered in U.S. and other countries.)*

## **Contact us**

10. Should you have any question about the Privacy Policy above, please contact our customer service via [csuk@cmlink.com](mailto:csuk@cmlink.com)

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