Privacy Policy

CC-2008-2041-MOBILUM OÜ, Pärnu mnt 11-Liivalaia 45, Kesklinna linnaosa, Tallinn, Harju maakond, 10151, Estonia

Company Number: 14000147, EE102288621 VAT, Estonian Business Register, Estonian Tax and Customs Board

MOBILUM SERVICES PRIVACY POLICY

Welcome to the MOBILUM OÜ (MOBILUM) privacy policy.

This privacy policy tells you what to expect us to do with your personal information when you make contact with us or use one of our services.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively you can download a pdf version of the policy. Please also see the Glossary to understand the meaning of some of the terms used in this privacy policy:

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1. GENERAL INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how MOBILUM collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up for a newsletter or purchase a product or service.

We do not provide services directly to children or intentionally collect their personal information.

CONTROLLER

Mobilum is the controller for the personal information we process, unless otherwise stated.

We have appointed a representative office (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

CONTACT DETAILS

There are many ways you can contact us, including by phone, email, live chat and post.

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name of legal entity: MOBILUM OÜ, Company number: 14000147, Company registered address: Pärnu mnt 11-Liivalaia 45, Kesklinna linnaosa, Tallinn, Harju maakond, 10151, Estonia, Company VAT number: EE102288621, Estonian Business Register, Estonian Tax and Customs Board, Email address: info@mobilum.eu, Telephone number: +372622 8080

Live chat: https://mobilum.eu/

Postal address: Mobilum, Kesklinna linnaosa, Tallinn, Harju maakond, Estonia, 10151

Telephone number: +372622 8080

You have the right to make a complaint at any time to the relevant supervisory authority for data protection issues in your country (e.g. DPF in Estonia). We would appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third parties and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. WHAT INFORMATION DO WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity Data Includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, photo, Social Security, Taxpayer Identification, or other government-issued identification, or other internal identifier, contact, and demographic information (including your IP address, device identifiers, and other unique identifiers, and your location information, if you provide it, for example, information that you let us know about your time zone or location).

Contact Data Includes mailing address, email address, username & screen name and telephone numbers.

Financial Data Includes bank account and payment card details, credit card details and other payment activity available information.

Transaction Data Includes details about payments to and from you and other details of products and services you have purchased from us.

Tax Data Includes withholding allowances and other tax information.

Technical Data Includes internet protocol (IP) address, your login data, information about devices, hardware model, device name, unique device identifiers, browser type and version, time zone setting and location, operating system and platform, device, browser, and other system and network settings, operating system and platform, and other technology on the devices you use to access this website.

Profile Data Includes your purchases or orders, your interests, preferences, feedback and survey responses.

Usage Data Includes information about how you use our website, products and services.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

PL Special Categories of Personal Data includes biographical (news reports from public records) of criminal convictions and alleged offences, criminal offences, and political opinions (collected only if you voluntarily provide this information, for example, information you provide in your Fraud detection process, or collection processes, or as may otherwise be required by applicable law. This includes, without limitation, the revised Estonian Money Laundering and Terrorist Financing Prevention Act and related guidelines and regulations issued by the FIU and FSA, and any successor legislation or rules in force from time to time. We do not collect these special categories of personal data, nor do we collect genetic information, and biometric information for the purpose of unique identification. Personal medical information, and personal reporting regulations.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

If you want us to establish the data's accuracy.

Where our use of the data is unlawful but you do not want us to erase it.

Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.

You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide, to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided to us. It does not apply to information collected from you or from third parties.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above please contact us.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within two weeks. Occasionally it could take us longer than three weeks if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

4. HOW DO WE GET INFORMATION?

We use different methods to collect personal data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data. This includes filling in forms or by corresponding with us by post, phone, email or otherwise for one of the following reasons:

This applies for any products or services;

You may create an account on our website;

You subscribe to our service or publications;

You request marketing to be sent to you;

You enter a competition, promotion or survey; or

You give us feedback or contact us.

As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources as set out below:

Credit reporting agency or credit bureau, where (with your prior consent) we consider you have had, currently have, or may have a financial relationship, including without limitation loans, prepaid card, future purchase of employment, financial institutions, personal reporting, agencies, other publicly available sources.

Technical Data from the following parties:

1 analytics providers such as Google based outside the EU;

2 advertising networks; and

3 search information providers.

Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

1. Identity and Contact Data from data brokers or aggregators.

2. Identity and Contact Data from publicly available sources.

5. OUR USE OF INFORMATION AND LAWFUL BASIS

We do not use your personal data more than the above, as we will only use your personal data in the following circumstances:

1 Where we need to perform the contract we are about to enter into or have entered into with you.

2 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

3. Where we need to comply with a legal obligation.

We rely on valid means to process your personal data:

LAWFUL BASIS

Legitimate interest means the interest of our business in conducting and managing our business to enable us to give you the best service/ product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative), and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

MARKETING

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

PURPOSES FOR WHICH WE WILL USE PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose / Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	(a) Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing & Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing & Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and to grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Profile (c) Usage (d) Marketing & Communications (e) Technical	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing & Communications	Necessary for our legitimate interests (to develop our products/ services and grow our business)

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that need to use it for another reason and that reason is compatible with the original purpose. If you want to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. SHARING YOUR INFORMATION

We may share your personal data with the parties set out below for the purposes set out in the table Purposes for which we will use your personal data above.

Internal Third Parties. This includes other companies in the Mobilum Group.

External Third Parties. This includes:

Service providers acting as processors based inside and outside of the EU who provide IT and system administration services.

Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers inside and outside of the EU who provide consultancy, banking, legal, insurance and accounting services.

Regulators and other authorities acting as processors or joint controllers based in Estonia who require reporting of processing activities in certain circumstances.

Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. OUR USE OF COOKIES

We use cookies on our website for a number of purposes. They help us provide you with a good experience when you browse our website and also allow us to improve our site. By continuing to browse our website, you are agreeing to our use of cookies.

WHAT ARE COOKIES AND WHY WE USE THEM

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

THIRD-PARTY COOKIES

Our website will several types of third-party cookies, and we do not control the operation of any of them. Third-party cookies that may be encountered are:

Google Analytics – we use Google Analytics to collect data about website usage. This data does not include personally identifiable information (PII) but does include general location information (country/region).

Bing Remarketing – we use Bing Remarketing cookies to remind previous visitors to our website that we are still in business. Bing may also use these cookies to serve relevant adverts to website visitors through their partner sites. The information gathered by the cookie may be used to serve adverts which they think will be most relevant to visitors in future searches. Bing does not store personal data. Information is collected in accordance with Microsoft's privacy policy and Microsoft's cookie policy.

Google Remarketing – we use Google's Remarketing cookie to remind previous visitors to our website that we are still in business. Google may also use these cookies to serve relevant adverts to website visitors through their partner sites. The information gathered by the cookie may be used to serve adverts which they think will be most relevant to visitors in future searches. Google does not store personal data. Information is collected in accordance with Google's privacy policy and Google Remarketing.

Google Tag Manager – we use Google Tag Manager to manage some of the cookies that we use on our websites. You can view Google's privacy policy here: https://policies.google.com/privacy?hl=en&gl=EE

Hotjar – we use Hotjar to gather data about how visitors interact with our website that covers usage in aggregate form. This helps us to improve our website. For more information on Facebook's privacy and cookie policy, visit https://www.facebook.com/policies/cookies/.

You can choose to accept or decline some of these cookies. Most web browsers automatically accept cookies, but you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

8. INTERNATIONAL TRANSFERS

Many of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

1 We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

2. Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

9. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Because email and text messages are generally not secure, we will never include your full name, bank account number, date of birth or password in our messages and the laundry of information. We will never request you to disclose all the nearly information security risks associated with such communications and take appropriate steps to safeguard your own information. We are not responsible for breach of security if we receive your message in error or in transit.

10. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Tax Data, Financial and Transaction Data, Special Categories of Personal Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see your legal rights above.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

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