
DATA PROTECTION AND PRIVACY POLICY

BESTMOBILEDEAL APP

BestMobileDeal (which is a trading name of Best Mobile Deal Limited) (“**We**”) understands that your personal data and privacy is important to you and that you care about how your personal data is used. We respect and value the personal data and privacy of everyone who visits our website, www.bestmobiledeal.com (“**Our Site**”) and download and uses our app, BestMobileDeal (“**Our App**”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Data Protection and Privacy Policy carefully and ensure that you understand it.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Account”	means an account required to use our App;
“Cookie”	means a small text file placed on your computer or mobile device by Our App. Details of the Cookies used by Our App are set out in www.bestmobiledeal.com ;
Our App	BestMobileDeal
Website	The website at www.bestmobiledeal.com

2. Information About Us

BestMobileDeal is an App and also the trading name of Best Mobile Deal Limited which is a limited company registered in England under company number 10795314. Its registration number with the Information Commissioner is ZA648896.

Our App is provided for free to consumers and business users. It gathers data for users of Our App as to the apps that they access on their mobile telephones including how often, when and where they use them. This data is used to provide intelligent advice to users as to the best mobile telephone and mobile telephone network deals (bearing in mind their usage). AppsUsed Limited is a subsidiary of Apps2Data (Holdings) Limited which is a non-trading company and registered with the Information Commission (ZA648906) as well as being an affiliate company of AppsUsed Limited (ZA64888). Both BestMobileDeal and AppsUsed are under common control.

The address of BestMobileDeal is: 1 King William Street, London, EC4N 7AR.

Data Protection Officer: Walter Tyser.

Email address: walter.tyser@bestmobiledeal.com

Telephone number: 0330 123 3345

3. **What this Policy Cover and How We may have obtained your personal data?**

This Data Protection and Privacy Policy applies to the use of personal data which you provided when registering an Account for Our App and also data relating to your use of Our App.

4. **What Is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”), the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 and the Data Protection Act 2018 (collectively, “**the Data Protection Legislation**”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simple terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. **What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Data Protection and Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 14.
- b) The right to access the personal data that we hold about you. Part 12 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 14 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 14 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 14.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have

that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

We would welcome the opportunity to resolve your concerns ourselves however, so please contact us first, using the details in Part 14.

6. What Data Do We Collect and How?

We have set out above at Part 3 the circumstances in which We collect your personal data. Here we set out how that data was obtained. We do not collect any 'special category' or 'sensitive' personal data **AND/OR** personal data relating to children **AND/OR** data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Identity Information including first and last name (" Identity Data ")	Via Our App on registration
Contact information including address, email address, telephone number (" Contact Data ")	Via Our App on registration
Device data eg geographical location, time zone (" Device Data ")	Via Our App
Data relating to usage of phone eg the type of Apps used, how often you access them, the amount of time you access them (" Usage Data ").	Via Our App

7. What we do with your Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. We rely upon the following two bases: Consent and Legitimate Interests. More information on these two bases can be found at the Information Commissioner's website at www.ico.org.uk. These are two of the six bases allowed under the GDPR. The following tables describes how we will use your personal data, and our lawful bases for doing so:

Purpose	What Data We Use	Our Lawful Basis
Enquiries about Our App	Identity Data, Contact Data	Legitimate interests: We need to read and store your personal data to respond to You
Registering an Account	Identity Data, Contact Data	Consent To use Our App, you must

		register an account which is governed by a contract between Us and You.
Analysis of data	Identity Data, Contact Data, Device Data, Payment Data, Usage Data	Consent and Legitimate Interests To allow Our App to provide you with advice as to best mobile deals, it will need to process Your data. You consent to this when you agree a contract between Us and You upon registering an account.
Technical and marketing updates about Our App	Identity Data, Contact Data	Consent. You have given your consent when registering an account to use Our App.
Marketing and data analysis purposes by Us and third parties vetted and selected by Us and our affiliate company Apps2Data (Data) Limited	Identity Data, Contact Data, Device Data, Payment Data, Usage Data	Consent. You have given your consent to this use upon registering an account to use Our App. Legitimate Interests. Our App is provided for free and to recoup the cost of doing so, careful and selected use of your data by affiliate companies and vetted third parties allows us to do so.

8. How We Share Your Personal Data

We will not share any of your personal data with any third parties for any purpose save in the following circumstances.

A. If **We** sell, transfer, or merge parts of **our** business or assets, your personal data may be transferred to a third party. Any new owner of **our** business may continue to use your personal data in the same way(s) that **We** have used it, as specified in this Privacy Policy.

B. In some limited circumstances, **We** may be legally required to share certain personal data, which might include yours, if **We** are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

C. **We** will share your personal data with our affiliate company, AppsUsed Limited who may license your personal data to third parties specifically selected and screened by us for their own internal purposes or to advertise, promote or supply certain products or services which AppsUsed and **We** believe may be of interest to **You** by reason of your Device Data and Usage Data. AppsUsed and **We** will not choose any third parties unless they have high standards as to adherence to Data Protection Laws and the principles underlying the same. Any use of your personal data by third parties will be controlled by AppsUsed and BestMobileDeal via written contract with third parties. If

those third parties use your personal data to advertise or promote services to you, we shall ensure that You are able to opt out of the same directly with the third party.

9. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity and Contact Data	We shall periodically review Accounts where there has been no usage of Our App for a substantial period of time (2 years or more) such that it can be considered a “dead” account. For the same, we shall ask you whether or not You wish your personal data to be kept by Us
Device Data, Usage Data	This data will be kept by Us for 20 years but where You have requested Us to delete your Identity and Contact Data, it shall kept in an anonymous form so that it cannot be linked to You

10. **How and Where Do You Store or Transfer My Personal Data?**

We will only store or transfer your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation.

11. **Keeping Personal Data Safe**

We shall use effective technological measures to keep your personal data safe and shall not store the same in servers outside the United Kingdom.

12. **Subject Access Request**

If you want to know what personal data **We** have about you, you can ask **Us** for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 14. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell **us** everything **We** need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover **our** administrative costs in responding.

We will respond to your subject access request within 1 month and, in any case, not more than one month of receiving it. Normally, **We** aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date **We** receive your request. You will be kept fully

informed of **Our** progress.

13. **How Do You Use Cookies?**

Our Site may place and access certain Cookies on your computer or device. **We** use Cookies to facilitate and improve your experience of **Our** Site and to provide and improve **Our** products **AND/OR** services . **We** have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on **our** Site are used in accordance with current Law and our Cookie Policy

Before Cookies are placed on your computer or device, you will be shown a dialogue box requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling **Us** to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of **Our** Site may not function fully or as intended. You will be given the opportunity to allow only first-party Cookies and block third-party Cookies.

14. **How Do I Contact You?**

To contact **Us** about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Walter Tyser) :

Email address: walter.tyser@bestmobiledeal.com

Telephone number: 0330123 3345

Postal Address: 1 King William Street, London, EC4N 7AR

15. **Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if **We** change **our** business in a way that affects personal data protection.

Any changes will be posted on **our** website