

## 1. Important information and who we are

### Purpose of this privacy policy

This policy is designed to provide you with information about how we use the personal data and information that you provide to us during your use of the ao.com, ao-mobile.com and/or mobilephonesdirect.co.uk websites or mobile apps (as applicable) (the “Sites”) and any communication (for example telephone) made between us relating to or resulting from such use.

AO Retail Limited is the controller of the information you provide. AO Retail Limited (“AO” or “we” “us” “our”) (t/a ao.com, AO Mobile or Mobile Phones Direct,) is a company registered in England and Wales with registered number 03914998. We are part of the AO World PLC group of companies and our registered office address is 5A Parklands, Lostock, Bolton, BL6 4SD.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

We may change our privacy policy from time to time. This policy was last updated on 31 July 2020 and is version 3.0.

## 2. The data 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 (first name, last name) marital status, title, date of birth and in some circumstances proof of identity.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details (stored in a tokenised format).
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, access times, any websites you linked from, pages you visit, the links you use, the ad banners and other content you view, your login data, browser type and version, information about your device, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password (which are hashed and not visible to AO.com), purchases or orders made by you, your interests, preferences, family size, affluence, gender and 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.

AO also collects, uses and shares **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.

### 3. How is your personal data collected?

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

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - purchase our products or services;
  - create an account on our ao.com website;
  - agree that marketing can be sent to you;
  - enter a competition, promotion or survey;
  - interact with us on social media; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** 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 other similar technologies. Please see our cookie policy for ao.com at <https://ao.com/help-and-advice/my-ao/cookies>, for Mobile Phones Direct [here](#), and for AO Mobile at <https://www.ao-mobile.com/information/cookies> 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:
  - **Technical Data** from the following parties:
    - (a) analytics providers;
    - (b) advertising networks; and
    - (c) search information providers.
  - **Contact, Financial and Transaction Data** from providers of technical, payment and delivery services.
  - **Identity and Contact Data** from publicly available sources such as Companies House

### 4. How we use your personal data

We will only use your personal data when the law allows us to. We only collect, keep, use or share your information for genuine business purposes in our legitimate interests, when you've approved us to do so or when we're legally obliged to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you (for example when you buy a washing machine or mobile phone).
- 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.
- Where we need to comply with a legal obligation.
- In limited circumstances, we may request your consent to process your personal data.

## Lawful Basis

For AO to be allowed to process your personal data, we must have a legal basis for the processing. The data protection legislation sets out what these bases are. We have described below the different bases that we rely on and provided examples of the processing.

- **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. If you do not want us to process any of the personal data we have listed as being processed for legitimate interests, you have the right to object. For more information see the section below relating to your rights. Please note that if you object we may still continue to process your personal data in certain circumstances. Please also remember that if we can't process your personal data for these purposes your customer experience may not be as enjoyable.
- **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. For example when you buy a product or service on any of our Sites, it creates a contract between us. We need to process your personal data that you provide in the order to fulfil our part of the contract and deliver the products to you. If you do not provide your details we won't be able to complete your order.
- **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. For example, if you buy a product which is an age restricted item (such as a game rated 18) or if there is a product recall.
- **Consent** means processing your personal data where you have explicitly told us that you will allow us to do so. In some cases, we will ask whether you would like us to process your personal data. For example, when an item is out of stock and you provide your telephone number for us to call to discuss available alternatives or notify you when the out of stock item becomes available. If you provide us with consent, you may withdraw it at any time by contacting us.

## Purposes for which we will use your 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.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer (or set up an account) and maintain such records	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Consent (if account not used) – you may withdraw your consent at any time by contacting us
When we communicate with you about any enquiry or order by any method (including telephone, email or live chat) or when you engage with us on social media	(a) Identity (b) Contact (c) Financial Data (d) Transaction Data (e) Profile (f) Marketing and Communications (g) Technical	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to analyse any customer interactions)
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Credit status approval	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Consent (only in respect of rental collections and vulnerable customers) – you may withdraw your consent at any time
To manage our relationship with you which will include: (a) Verifying your identity if you contact us (b) Notifying you about changes to our terms or privacy policy (c) Asking you to leave a review or take a survey (and the results of such review or survey)	(a) Identity (b) Contact (c) Profile (d) Marketing and 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 and provide other consumers with information about our products or 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 and 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 grow our business)

<p>To administer and protect our business and our websites (including troubleshooting, testing, data analysis, testing, system maintenance, support, reporting, hosting of data, research, and risk management)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security.)  (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content (including pop ups) and advertisements to you and measure or understand the effectiveness of the advertising we serve to you. Such processing includes matching and aggregating of your personal data with internal and external sources <b>(Personalisation)</b></p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>(a) Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)  (b) Consent (where such use involves cookies), you may withdraw your consent at any time</p>
<p>To use data analytics including which parts of our website you visit to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>(a) 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)  (b) Consent (where such use involves cookies) you may withdraw your consent at any time</p>
<p>To make suggestions and recommendations to you about goods or services <b>(Marketing communications)</b> that may be of interest to you on the website (or elsewhere on the internet including on social media platforms) or (if you have previously purchased from us) by email, SMS, telephone, social media or post</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications</p>	<p>(a) Necessary for our legitimate interests (to develop our products/services and grow our business)  (b) Consent (where such use involves cookies), you may withdraw your consent at any time</p>
<p>To call you on the telephone to discuss your delivery and offer other services such as insurance, recycling and mobile phone upgrades</p>	<p>(a) Identity (b) Contact (c) Financial Data (d) Transaction Data (e) Profile (f) Marketing and Communications</p>	<p>Necessary for our legitimate interests to ensure that we have all the relevant details to provide you with a smooth delivery and to grow our business</p>
<p>To contact you where you have asked us to including:  (a) to notify you when an out of stock</p>	<p>(a) Identity (b) Contact</p>	<p>Consent, you may withdraw this consent at any time</p>

<p>item becomes available by email, SMS or call to discuss alternative</p> <p>(b) information about new product releases</p> <p>(c) if you are not a customer and have registered to receive marketing communications</p>	<p>(c) Marketing and Communications</p>	
<p>To comply with legal obligations and prevent crime including:</p> <p>(a) crime and fraud prevention purposes;</p> <p>(b) to verify your age when purchasing age restricted items;</p> <p>(c) to conduct anti money laundering checks</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Technical</p> <p>(e) Usage</p> <p>(f) Profile</p>	<p>(a) Necessary to perform the contract with you</p> <p>(b) Necessary for our legitimate interests (to prevent fraudulent purchases on our websites)</p> <p>(c) To comply with a legal obligation</p>
<p>To improve our service quality including:</p> <p>(a) providing training for our employees to ensure that we provide you with the best possible service;</p> <p>(b) call recording for training, compliance and legal or regulatory reasons;</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p>	<p>(a) Necessary for our legitimate interests (to improve service quality and compliance)</p> <p>(b) To comply with a legal obligation</p>
<p>To ensure that you receive any cashback offered (either directly or via any affiliate website such as TopCashBack)</p>	<p>a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Technical</p>	<p>(a) Necessary to perform the contract with you</p> <p>(b) Consent (where such use involves cookies), you may withdraw your consent at any time</p>
<p>To operate our Refer a Friend Scheme</p>	<p>a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Technical</p>	<p>(a) Necessary to perform the contract with you</p> <p>(b) Necessary for our legitimate interests (to present you with the offer of a discount)</p> <p>(b) Consent (where such use involves cookies), you may withdraw your consent at any time</p>

### When we will contact you

We may contact you by telephone shortly after your purchase to discuss your delivery and make sure that it all goes smoothly for you. We may also offer you other services which relate to the products that you have purchased. If you decide not to purchase a product protection plan on such call we may contact you around

the expiry of the manufacturer's guarantee to see whether this would then be of interest to you. If you do not wish to receive these calls, please contact us by phone, email or post.

Please note, if you submit information in relation to your order but there is an error or delay in processing, we may use the details you've submitted to contact you to complete your order.

We may also contact you when an item is out of stock, have requested to discuss available alternatives or notify you when the out of stock item becomes available or you have requested updates on product releases. Please note If you have asked us to notify you when an out of stock item becomes available, the email will not have an unsubscribe link in it as it is a single email notification. Unsubscribing from marketing will not affect your ability to receive an out of stock notification.

If you rent one of our products, we may contact you prior to your payment due date to remind about your upcoming payment. If you fail to make payments in line with the rental agreement, we may contact you via telephone, SMS, email and post to ensure the arrears are cleared. If we contact you during this process and we feel that you may be considered a vulnerable individual we may need to ask you for sensitive information and may require medical information from you. We will always request consent when processing information regarding vulnerable customers.

Should you wish to review our products or services, we may contact you after leaving the review.

### **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 goods or services from us and you have not opted out of receiving that marketing.

### **Opting out**

We like to be able to keep you up to date with news, offers and promotions, but you can opt out of receiving email and, text messages from us at any time. To do this, you can click the unsubscribe box that appears on the order confirmation page when you place an order, click on the "unsubscribe" link on the bottom of any of our marketing emails, text stop to the number provided in any text message or contact our contact centre, find our contact details [here](#).

You can opt out of receiving telephone calls or postal marketing from AO at any time. To do this you can email us at [dataprotection@ao.com](mailto:dataprotection@ao.com) or call our contact centre, find our contact details [here](#).

If you opt out of any marketing, it may take a couple of days for all of our systems to update, so bear with us whilst we process your request.

### **Change of purpose**

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

## 5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above.

### Internal Third Parties

Other companies in the AO World Plc Group acting as joint controllers or processors and who are based England and Germany and provide IT, shared services, logistics services, system administration services and undertake leadership reporting.

### External Third Parties

- Service providers acting as processors who provide delivery services, insight services, delivery of marketing communications services, IT remote set up services, and IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.
- Our credit reference agencies (CRA) Equifax and/or Transunion for the purposes of performing credit checks.
- GB Data for the purposes of undertaking anti money laundering checks required by law.
- Domestic and General Insurance will receive Identity Data, Contact Data, Financial Data and Transaction Data if you choose to purchase an insurance plan. Additionally, it may receive recordings of telephone calls between you and us in respect of any extended warranty.
- Newday Limited will receive Identity Data, Contact Data, Financial Data and Transaction Data if you choose to purchase using finance. Additionally it may receive recordings of telephone calls between you and us in respect of your AO Finance Account as Newday Limited is the lender.
- Mobile networks in order to enter you into a contract with your chosen mobile network provider.
- Mention Me Limited will receive certain Contact Data and some Transaction Data from AO if you choose to participate in our Refer a Friend scheme. Mention Me operates the platform for AO. The full terms and conditions of the scheme are available on the referrer and referee pages on the Mention Me website. By signing up to the scheme you will be subject to Mention Me's terms and conditions and privacy policy which can be found [here](#). Emails are generated by the Mention Me platform but Mention Me will never use your details for any other purpose.
- If you are a rental customer we may share your information with your local authority.
- Social media platforms or internet platforms either as processors or joint controllers (in some instances this may be based on cookies for more information see [here](#) for ao.com or [here](#) for MobilePhonesDirect or [here](#) for AO Mobile.
- Third party payment providers which are integrated into our website. When you pay using one of these methods e.g. Paypal, you are redirected to the providers portal. Your use of these services is subject the terms and conditions and the privacy policies of these payment providers.

- 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 never sell your data. 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.

We sometimes share anonymised information and analytics with External Third Parties but not in any way that they could identify you as an individual.

## **6. Our Finance Provider, NewDay Ltd**

If you choose to purchase by using finance. The payment option is provided by our chosen partner, NewDay Ltd. We've teamed up with NewDay Ltd to offer you an option to pay on finance. NewDay Ltd provides a credit amount which can be spent on ao.com. As part of the process an eligibility check will be completed; this will not leave a footprint on your credit file. If the check is successful you will then need to complete a full credit check.

If your application is successful, you will enter into a Credit Agreement with NewDay Ltd. At this point you will be allocated a credit limit tailored to your personal circumstances, this will be the amount of money you will be able to spend on our site. If your application is unsuccessful as a result of the automated decision you can request that it is reviewed by an individual at NewDay and that your application is reconsidered.

NewDay Ltd of 7 Handyside Street, London, N1C 4DA is authorised and regulated by the Financial Conduct Authority under registration number 690292.

AO Retail Limited of 5a Parklands, Lostock, Bolton BL6 4SD is acting as a credit broker for NewDay Ltd.

If NewDay are unable to offer you this service we may contact you via telephone or email with alternative proposals on how you may be able to obtain the product you wish to purchase or a similar product.

## **7. Our Credit Reference Agencies, Equifax and Transunion**

We may also send your information to:

- Equifax who will act as a credit reference agency (CRA). For more information on how Equifax will use your data please see <https://www.equifax.co.uk/crain.html>; or
- Transunion who will act as a credit reference agency (CRA). For more information how Transunion use your data please see their privacy policy at <https://www.transunion.co.uk/legal-information/bureau-privacy-notice>

## **8. International transfers**

AO may transfer your personal data outside of the European Economic Area.

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:

- 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. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.

- 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. For further details, see European Commission: Model contracts for the transfer of personal data to third countries .
- Where we use providers based in the US, we may transfer data to them if they are either part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US or we have put the correct Standard Contractual Clauses in place. For further details, see European Commission: EU-US Privacy Shield or Standard Contractual Clauses.

## 9. 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 relating to purchases and rentals (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax and other regulatory purposes. We retain your transaction data for a period of ten years after your purchase, this is a requirement inline with certain product liability provisions under the Consumer Protection Act 1987.

If you call or message our contact centre with an enquiry (but do not place an order) we will keep your personal data for one month.

If you ask us to notify you about an out of stock item, we will do so if it becomes available within one month of your request.

If you receive marketing emails and SMS from us and have not unsubscribed from these messages we will continue to process your personal data for this purpose for a maximum period of four years. You may ask us to stop processing for this purpose at any time.

In some circumstances you can ask us to delete your data: see [Your legal rights](#) below for further information.

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.

## 10. 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 successfully 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 the 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 consent for us to use or where we used the information to perform a contract with you.

**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 at [dataprotection@ao.com](mailto:dataprotection@ao.com).

#### **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 for 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 one month. Occasionally it could take us longer than a month 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.

### **11. Contact details**

We're always looking for new ways to improve your shopping experience with us, that's why we love hearing from you. If you have any questions about how we use your personal data or if you'd like to amend or stop us from processing your data (for marketing purposes), please contact us. You can get in touch by giving our friendly contact centre a call on **0161 470 1200** for any purchases from ao.com and **0345 470 4000** for any MobilePhonesDirect or AO Mobile purchases. Alternatively, you can write to us at our registered office address - 5A Parklands, Lostock, Bolton, BL6 4SD.

If you have any questions about this privacy policy or our privacy practices, we have appointed a Data Protection Officer (DPO). You may contact the DPO by writing to us at the registered office address set out above or by emailing **[dataprotection@ao.com](mailto:dataprotection@ao.com)**.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **If you fail to provide personal data**

Where AO needs 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 goods or 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.

### **12. Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about cookies on our websites click [here](#) for ao.com or [here](#) for MobilePhonesDirect or [here](#) for AO Mobile.

### **13. Security**

Your privacy is important to us which is why we've ensured every part of our site uses secure connections. Look for the green padlock in the address bar and the letters 'https', as these should always be present when browsing our site.

We only take orders through web browsers that allow communication through Secure Socket Layer (SSL) technology. There's no way you can order through an unsecured connection.

To keep you safe, we gain accreditation from the Payment Card Industry (PCI) every year. This third-party certification certifies that we take appropriate precautions to make sure your details are kept safe. This covers everything from ensuring our teams are well trained in the security risks and vulnerabilities today, to implementing security compliant IT solutions. More information regarding this security standard can be found here: [https://www.pcisecuritystandards.org/pqi\\_security/](https://www.pcisecuritystandards.org/pqi_security/).

For extra security, you'll see our checkout uses Verified by Visa, Mastercard SecureCard and American Express Safekey, which safeguards you from unauthorised use of your cards. Once you've registered and created a password with your card issuer, you'll be prompted to provide this each time you check out.

We're constantly monitoring and testing our IT systems and using the latest technology to identify potential vulnerabilities and attacks to provide a safe and secure shopping environment.

We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personal customer information. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.

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

## Mobile Phones Direct Cookie Policy

Cookies are small file containing letters and numbers that is stored in your browser or the hard drive of your device and it is used to transfer information. There are different types of cookies that we use. We've given you more information below so you understand why we use these cookies.

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a better experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

We use the following cookies:

- **Essential cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to navigate our website, and use its features. When you return to the site, they enable us to remember the products that you've looked at or added to your basket.
- **Personalisation cookies.** These allow us to recognise and count the number of visitors to our website, and see how they use it. This helps us to learn where we can improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. We will track the volume of people on our site, where they click and where they exit the site.
- **Remarketing 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 party service providers so that we can show adverts that are relevant to you elsewhere on the internet. By continuing to browse our website or use the app, you provide consent to us storing these cookies on your device and using them if you visit our site again. You can delete cookies at any time in your device browser. The method of deletion will vary so please check the help section on your device browser for more information. If you delete or block cookies it may affect the way our website works for you.