

UNSHACKLED.COM PRIVACY POLICY

UNSHACKLED.com Limited is committed to protecting and respecting your privacy. This policy explains how we use your personal data. By visiting www.unshackled.com you are accepting and consenting to the practices described in this policy. When we refer to “we” or “our” we are referring to Unshackled.com Limited.

For the purpose of the Data Protection Act 1998 (the Act), the data controller is Unshackled.com Limited, registered in England with company number 09595904 and registered office at Suite 18, 18 Hilton Street, Manchester M1 1FR.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- **INFORMATION YOU GIVE US.**

You may give us information about you by filling in forms on our site www.UNSHACKLED.com (our site) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you create an account/register for our website, place an order (or begin placing an order), register your interest in an upgrade or a product that is ‘coming soon’, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number, financial, bank account and credit card information.

- **INFORMATION WE COLLECT ABOUT YOU.**

With regard to each of your visits to our site we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- Information we receive from other sources. We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties (including, for example, financial services providers, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search

information providers, credit reference agencies) and may receive information about you from them.

COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our cookie policy.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:+

- INFORMATION YOU GIVE TO US.

We will use this information:

- To carry out our obligations arising from any contracts entered into on our site and to provide you with the information, products and services that you request;
- To contact you in relation to incomplete or failed orders;
- If you have requested that we contact you in relation to a specific product or service (for example, a product that is 'coming soon'), to contact you in relation to that product or service;
- To provide you with information (via phone, SMS, post or email) about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- To provide you, or permit selected third parties to provide you, with information (via phone, SMS, post or email) about goods or services we feel may interest you. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please indicate this in the relevant box situated on the form on which we collect your data or email.
- To notify you about changes to our service;
- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To carry out a credit check on you (if applicable – please see Credit Check section below)

- INFORMATION WE COLLECT ABOUT YOU.

We will use this information:

- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, customer satisfaction, statistical and survey purposes;
- To improve our site to ensure that content is presented in the most effective manner for you and for the device you use to access our site;
- To allow you to participate in interactive features of our service, when you choose to do so, and to administer the 'My Account' function;
- As part of our efforts to keep our site safe and secure;
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;

- To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- INFORMATION WE RECEIVE FROM OTHER SOURCES.

We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

QUICK RATE CHECK (PRE-APPLICATION SEARCH)

- If you submit a Quick Rate Check request we will check your eligibility with one or more financial providers to assess what financing options may be available to you.
- This assessment will not be provided to you directly, however we will use the results to suggest propositions that may be appropriate for your circumstances.
- The Quick Rate Check will not affect your credit status in any way but will leave a 'soft footprint' on your credit file which is visible only to you.
- Please note, the results of your Quick Rate Check do not guarantee you will be eligible for any particular financing option and once you have chosen your preferred financing option, a full credit and fraud check will be performed by your preferred financial provider (see below).

CREDIT CHECKS, FRAUD PREVENTION AND DISCLOSURE FOR LEGAL REASONS

- **Credit checks/credit reference agencies.** For certain orders (e.g. where you wish to take a loan for a device) the applicable financial services provider and/or we will use your personal information to verify your identity and to perform a credit search with one or more of the credit reference agencies and will make a credit assessment using credit scoring. The agencies will record details of this search, whether your application is successful or not, and may disclose that information, and the fact a search was made, to their other customers for the purposes of assessing the risk of giving credit, to prevent fraud and to trace debtors.
- **Prevention of fraud.** We and/or the applicable financial services provider will also check your personal information against fraud prevention databases. Any false or inaccurate information we suspect of fraud will be recorded and may also be passed to the fraud prevention agencies to prevent fraud and money laundering. Law enforcement agencies may also use this information. We and other organisations may also access and use this information to prevent fraud and money laundering, for example when checking details on applications for credit and credit related accounts or facilities, recovering debt, checking details on proposals and claims for all types of insurance and checking details of job applicants and employees. We and other organisations may access and use from other countries the information recorded by fraud prevention agencies. When assessing your application/order, we will also apply fraud prevention rules which may include limiting the number of handsets that can be supplied to an individual. We reserve the right to decline an application/order as a result of those rules.
- **Disclosure for legal reasons.** We may use your personal information in order to comply with a legal duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce any legal rights or obligations; or to protect the rights, property, or safety of UNSHACKLED.com Limited, our customers, or others. If the police or any other regulatory authority investigating suspected illegal activities requests

your personal information in connection with such an investigation, we are entitled to share your information with them.

DISCLOSURE OF YOUR INFORMATION

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may share your information with selected third parties including:

- Your financial service provider, who may in turn share your information with credit reference agencies for the purpose of assessing your credit status where this is a condition of the network entering into a contract with you;
- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you. Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- (in the event that we sell or buy any business or assets), the prospective seller or buyer of such business or assets

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking or unchecking certain boxes on the

forms we use to collect your data. You can also exercise the right at any time by contacting us at **talktous@unshackled.com**.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

ACCESS TO INFORMATION

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be sent to **talktous@unshackled.com**.