

## **CUBIC TELECOM –PRIVACY POLICY - AUDI**

### **Cubic Telecom-Privacy Policy**

Cubic Telecom Limited (hereinafter referred to as "Cubic" "us" "we" or "our") is committed to respecting your privacy and to complying with all applicable data protection and privacy laws.

We acknowledge that our customers like to be briefed on what we do with their personal data. Therefore the objective of this policy is to inform you how we handle your personal data.

Cubic offers a range of product and services including mobile telecommunications and internet (related) services.

This policy applies to all personal data ("Data") in our possession and specifically includes the following: service usage data and customer information (including name, address, fixed line number, mobile number, email address and all other contact details).

Any content viewed on internet sites visited by customer is outside the scope of this Policy.

#### **Acquisition**

1. All Data will be obtained fairly. We will make you aware of all purposes that we intend to use your Data for at the time of collection or will be advised to you prior to use.
2. Data will be accurate and complete and, where necessary, kept up to date.
3. Data will be adequate, relevant and not excessive in relation to the purposes for which it was obtained.
4. All acquisition methods (e.g. customer application forms, competition entries) will have a clear information piece explaining any intended purposes including secondary uses that may not be obvious to you (e.g. if competition entries are intended to be used for marketing purposes this will be clearly advised to you and an appropriate opt out box will be provided).

#### **Use and Disclosure of Information**

1. Data will be kept only for clear and legal purposes.
2. All Data will be processed fairly and in keeping with the purposes for which it was obtained.
3. Data will not be used, disclosed or processed in any manner incompatible with the purposes for which it was obtained.
4. Disclosure of Data will only be made to third parties who are our agents or servants acting on our directions. Save as required by law (e.g. criminal investigations) no disclosure of Data will be made to third parties for those third parties' own purposes or use.
5. Under no circumstances will lists of customer data/information (i.e. mailing lists or database information) be disclosed to a third party for that third party's exploitation or use without your express permission. Data may be legitimately given to Cubic's servants or agents for legitimate purposes as described above. This may include the transfer of data to other jurisdictions for processing. In these circumstances Cubic will ensure that adequate contractual and technical safeguards are in place to protect your Data. All such processing will take place in full compliance with all applicable laws.

- If Data has been obtained for a purpose without advising you of other compatible secondary purposes for which it is subsequently to be used, the Data will not be so used without advising you.

### Retention

- Data will be kept for no longer than is necessary for the primary purpose for which it was obtained.
- Data will be retained for any period required by law.
- Some Data that is not otherwise subject to retention for normal reasons may need to be retained because of circumstances such as litigation or government investigation.
- Subject to paragraphs 2 and 3 the following specific retention periods will be followed:

Type of Record or Information	Retention Period
<b>Data Service Usage Details</b> (WAP site visits, web site visits, live! Use, text alert subscriptions)	6 months plus current month (max.) for our purposes (as described above and in our general terms and conditions). This data does not include content.  For legal purposes usage records will be retained for a period of 12 months to comply with State requirements. This retention will take place in a restricted access secure system and will not be used for Cubic's commercial purposes.
<b>Cookies</b>	Cookies are stored on a per session basis only to aid your navigation of our web-sites. Persistent cookies may be set to store display related preferences. Depending on your browser you may also be able to control cookie use by altering your browser settings.
<b>Invoices</b>	6 years plus current year for invoices.
<b>Location Based Information for value added services</b> (excluding network traffic data)	Deleted immediately on completion/ termination of the value added service.

### Cookies

- Cookies are tiny text files that are stored on your computer, tablet or mobile phone when you visit a website in order to help the website work efficiently, to help us analyse the way our website works and how we can improve it, and to ensure that the website functions to the optimum. We make some use of cookies on certain online services where your account details are accessible but for your security these cookies

are only used to maintain session details (e.g. logon, site preferences etc.) and do not contain any user-specific details (such as user names, passwords or bank details). We take looking after your details seriously – we're always monitoring and improving how we protect your personal information.

2. Depending on the type of browser you are using (e.g. Microsoft Internet Explorer, Mozilla Firefox, Google Chrome, Safari etc.), you may be able to configure your browser so that: (i) you are prompted to accept or reject cookies on an individual basis or (ii) to prevent your browser from accepting any cookies at all. You should refer to the supplier or manufacturer of the web browser for specific details about cookie security.

#### **Access to your Information**

1. You are entitled to copies of your Data kept by us. Requests should be in writing and should be addressed to Data Protection Officer, Cubic Limited, Cubic Telecom Limited, Corrig Court, Corrig Road, Sandyford, Dublin 18 Ireland. Please quote your name, address and your mobile number. We will take all reasonable steps to confirm your identity before issuing any copy Data.

#### **Information Security**

1. Cubic is constantly reviewing and enhancing its technical, physical and managerial procedures and rules to protect your personal data from unauthorised access, accidental loss and/or destruction. We use industry standard secure sockets layer (SSL) technology, for example, to encrypt sensitive information such as your credit card and other financial information.
2. Please be aware that communications over the Internet, such as emails/webmails, are not secure unless they have been encrypted. Your communications may route through a number of countries before being delivered - this is the nature of the World Wide Web/Internet. Cubic cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.
3. It may be necessary to transfer your personal information to other group companies or service providers located in countries outside of the European Economic Area (EEA). This may happen where our servers or suppliers and service providers are based outside of the EEA or where you use our services and products while visiting countries outside of the EEA. The data protection and other laws of these countries may not be as comprehensive as those in Ireland or the EU - in these instances we will take steps to ensure that your privacy rights are respected.

#### **General**

1. If you have any query about Cubic's data protection policy or practices, please write to: Data Protection Officer, Cubic Telecom Limited , Corrig Court, Corrig Road, Sandyford, Dublin 18 Ireland or send an email to [dataprotection@Cubictelcom.com](mailto:dataprotection@Cubictelcom.com)
2. This policy should be read in conjunction with the general terms and conditions of this website and the general terms and conditions that apply to your use of Cubic services.
3. We reserve the right to amend or modify this Data Protection Policy at any time in response to changes in applicable data protection and privacy legislation.

\* We may charge a small fee to cover the administration costs. This fee is set by the Data Protection Commissioner from time to time.

\*\*The European Economic Area (EEA) currently comprises the Member states of the European Union plus Norway, Iceland and Liechtenstein.