

## **COVE MOBILE - PRIVACY POLICY**

The following Privacy Policy applies from the *last updated date: 9th December, 2024*.

**This policy covers our privacy practices in connection with our website, app, and the service we provide to you.**

### **1. INTRODUCTION**

'cove' is brought to you by shaka Telecommunications Ltd trading as "shaka" ("cove", "We" or "Us").

This notice sets out in clear and plain terms how we collect, store, use, and share your information as a visitor to our website ([www.cove-mobile.com](http://www.cove-mobile.com)).

We act as the "Data Controller" of the information you provide to us or that we know about you through your use of cove for the purposes of data protection law.

### **2. PRIVACY COMMITMENT**

At cove, we respect your right to privacy and value you as our customer. We rely on a set of principles that underpin how we use your personal information:

- We will keep your personal information secure and confidential.
- We will only collect, store, use and share personal information about you with your awareness.
- We will provide you with the information required to control, access, and update your personal information.

This Privacy Policy should be read in conjunction with our Terms and Conditions, which apply to your use of cove and are incorporated into and form part of this Privacy Policy.

### **3. CHILDREN DISCLAIMER**

We do not knowingly collect the data of individuals under the age of 13. If you are aged 16 or under, you must obtain your parent or guardian's consent to provide your personal information to us.

### **4. UPDATES TO THIS POLICY**

As the app evolves, it's likely that we'll need to update this policy from time to time. If we change this Privacy Policy we will post the amended policy on our website, so you will always be aware of how we collect, use and disclose your personal information.

Please do read this policy and any updates carefully so you fully understand your privacy rights and how we will collect, store, use and share your information.

## 5. OUR SERVICES

Our website provides a variety of services to you as the customer, including:

1. Access to your authenticated account data, including the ability to review your allowances, current usage, extra charges incurred, and your plan renewal date.
2. Access to your plan information (including the plan name, renewal date, monthly charge, allowance information, active add-ons, the ability to buy an add-on).
3. Access to your plan usage history.
4. Links to useful pages hosted at *help.cove-mobile.com* with information on your payment options, your account information, and other support.
5. Web chat for quick support.
6. Campaigns, offers and content made available to you, provided that you have selected this function to be active.

## 6. COLLECTION AND USE OF YOUR PERSONAL INFORMATION

Where you have provided consent we will collect and use the following information from your use of the website.

Your personal information may be used by us, our employees, our service providers and disclosed to third parties in the ways described below.

Where we rely on the lawful basis of legitimate interests, we assess our business interests to make sure that these do not override your rights. Additionally, in some cases you have the right to object to this processing. For more information visit the Your rights section of this policy.

### 6.1 INFORMATION WE COLLECT

- **Authentication information**
  - When you log in and use the website, we will automatically carry out authentication checks to make sure that you are our customer.
- **Account, technical, and device information, including:**
  - Your account data, including your mobile number, plan, allowances, current usage, historical usage and other account information. We will use this to display your account data within the website..
  - Technical information, including your IP address, device (name, type, model), operating system, network, and the date and time. We will use this technical information to analyse trends, administer and improve the website and the services we offer, track user movement through the website and gather statistical information about visits to, and active use of, the website..

- Information from your device, where you have granted the relevant operating system permissions.

## 6.2 HOW AND WHY WE USE YOUR PERSONAL INFORMATION

### 1. User Profile

- Why we use your data:** To bring you a better customer experience, including intelligent and personalised product offerings, discounts and rewards from us and our partners
- How we'll use your data:** With your consent, we'll create a unique profile of you and your interests from:
  - Information we know about you as a network customer.
  - Information you tell us when you use the website..
  - Information we infer about your interactions with the website..
  - Information from your website usage.
  - Information provided to us by third parties who have your consent to share your information. We'll match and combine each of the above information sources to really get to know you and your interests.
- Our legal reason:** Consent, which you can withdraw at any time by accessing your 'Account Settings' in the website.

### 2. Marketing products and services

- Why we use your data:** We have incredible deals and services that we don't want you to miss out on. With your permission, we want to send you emails and/or the odd pop-up within the website about the products and services we have to offer.
- How we'll use your data:** With your consent, we'll use your unique profiles to bring you information on products, services and offers we know you'll love.
- Our legal reason:** Consent, which you can withdraw at any time by accessing your Account Settings on *app.cove-mobile.com*.

### 3. Analyse user trends and usage of our website

- Why we use your data:** We use analytics software (e.g. Google Analytics) to track usage throughout our website. This helps us to analyse trends and improve the website.
- How we'll use your data:** We will monitor and track usage information.
- Our legal reason:** Legitimate interests.

### 4. Maintain, develop, improve, operate and deliver the website and services

- Why we use your data:** To maintain, develop, improve, operate and deliver the website and services.
- How we'll use your data:** We may use software to provide customer satisfaction surveys to you. This helps us to gather and analyse customer feedback about, and improve, the website.

- c. **Our legal reason:** Legitimate interests.

## 7. YOUR RIGHTS

You have certain rights in relation to the personal information we hold about you. If you wish to exercise any of these rights, please contact us using the details in the 'Contact us' section below. Please note that these rights do not apply in all circumstances.

- **Right of access:** you have the right to access a copy of your personal information we hold about you.
- **Right to rectification:** you have the right to correct personal information we hold about you if it is inaccurate, incomplete, or out of date.
- **Right to erasure:** you have the right to request erasure of your personal information you have given to us in certain circumstances. You can download the Request for the Right to be Forgotten form.
- **Right to restriction:** you have the right to request that our use of your personal information be restricted.
- **Right to portability:** you have the right to obtain your personal information in a structured, commonly used, and machine-readable format and for it to be transferred to another organisation, where it is technically feasible. The right only applies where the use of your personal information is based on your consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e., electronic) means. You can download the Right to Data Portability form.
- **Right to object:** you have the right to object to your personal information being processed on the basis of legitimate interests (see section entitled 'Use of Your Personal Information').
- **Right to withdraw consent:** you have the right to withdraw your consent at any time where we rely on consent to use your personal information. Rights regarding automated decision making: you have the right not to be subject to a decision based solely on automated processing.
- **Right to complain to the relevant data protection authority** You have the right to complain to the relevant data protection authority, which is, in the case of us, the Information Commissioner's Office, where you think we have not used your personal information in accordance with data protection law.

## 8. THIRD PARTIES

We may receive personal information about you from:

- a. Fraud prevention agencies such as CIFAS. We and other companies may use this information if decisions are made about you on credit or credit-related services; and
- b. commercial partners who supply goods and services to us.

Your personal data may be processed by third-party organisations on our behalf for application processing and service provision, remaining under our control. We may disclose your data to

our group companies, partners, agents, subcontractors, and potential business successors, including those outside the European Economic Area (EEA), ensuring equivalent UK standards of protection. Further,

- a. When third-party or partner services are acquired, data exchange may occur for account management purposes. These parties may collect data during interactions, but we do not manage their privacy practices—please review their policies independently.
- b. We may disclose your data for crime prevention, protection of interests, legal obligations, and during business transactions, such as asset sales or corporate reorganisations, where personal data may be transferred as an asset.

Your data is primarily stored on UK or EEA servers. Transfers to service providers outside these regions are safeguarded to uphold UK/EEA protection levels.

## **9. HOW LONG WE KEEP YOUR INFORMATION**

We'll keep your personal information for as long as necessary for the purposes for which it was collected, to provide you with services and to conduct our legitimate business interests or where otherwise required by law. If you use our Services, we may hold your Communications Data for 12 months for legitimate business purposes (or longer in connection with any legal proceedings or disputes).

## **10. CONTACT DETAILS**

Please feel free to contact us using the contact details below if you have any questions about this notice, or if you wish to exercise any of the rights detailed in the 'Your Rights' section.

**Email:** [dpa@shaka.tel](mailto:dpa@shaka.tel)

**Post:** Data Protection and Privacy Officer, Shaka C/O Antler, 32-38 Leman Street, London, England, E1 8EW

**How to contact the Regulator:** You have the right to report any concern in relation to our information rights practices to the Information Commissioner's Office. To learn more, please visit <https://ico.org.uk/concerns> or call their helpline on 0303 123 1113.