

China Unicom (Europe) Operations Limited Privacy Policy

Last updated: October 2020

Introduction

We respect your right to privacy. This privacy policy explains how China Unicom (Europe) Operations Limited (collectively, "**China Unicom Europe**", "**we**", "**us**" or "**our**") deal with personal information when you use our products and services (such as phone, broadband, telecoms and technology services) and our websites and when we engage in sales and marketing to you.

It applies to you even if you do not have a contract with us but instead make use of products and services purchased by others (which may include your employer or other communications and technology providers who use our products and services). This policy will apply to sole traders and partners who are individuals.

Please consult the section B below on the "Scope of this Policy" for more information as to when it applies.

We recommend that you read this Privacy Policy in full to ensure you are fully informed. However, if you only want to access a particular section of this Privacy Policy, then you can jump to the relevant sections by referring to the headlines.

A. What does China Unicom Europe do?

China Unicom Europe is a telecommunications operator providing a variety of products and services. Our products and services include a range of information and communications technology services for enterprises and carriers.

B. Scope of this Policy

This privacy policy applies to China Unicom Europe when you use our products and services or our websites. More information about our products and services can be found on our websites.

This privacy policy sets out what personal information we collect and how we use it, among other things. **Personal information** includes any information that tells us something about living individuals. The personal information we collect will depend on the products and services that you use and the websites that you access.

This privacy policy does not include information about our employees, consumer services or any other services which are covered by a separate privacy policy. Please do review our other privacy policies for information about we process personal information in these circumstances.

Where we act use personal information on behalf of other businesses in order to deliver our products and services, this privacy policy will not apply. You should consult the privacy policy of the business on whose behalf we are acting.

C. How we collect your information and why

The personal information that we may collect falls into the categories set out below. We use each category of personal information for the purposes described below.

Where we use personal information on behalf of another business or organisation, that other business or organisation will determine how and why we should use that personal information and the list below will not apply.

Data used	Purposes of processing	Legal basis*
<p>Customer Relationship Management (CRM) data (includes your name, job title, business address, email address, telephone number, photo, marketing preferences and invoicing information)</p>	Delivering Products and Services	Legitimate interests
	Providing assistance with Products and Services	Legitimate interests
	Sales and Marketing	Legitimate interests
<p>Communications data (including call quality, IP address, MAC address, websites visited, telephone numbers called and text, caller ID information, location information, security characteristics, bandwidth used and transmission rate)</p>	Delivering Products and Services	Legitimate interests
	Providing assistance with Products and Services	Legitimate interests
	Compliance with legal and regulatory obligations	Legal obligation
<p>Content data (including content of electronic messages such as, SMS, MMS, IM messages and email, other electronic communications such as, speech, music and sounds and any electronic messages and communications sent to us or that we access via other means when we are authorised to do so such as, screen-recording).</p>	Delivering Products and Services	Legitimate interests
	Providing assistance with Products and Services	Legitimate interests
	Compliance with legal and regulatory obligations	Legal obligation

<p>End user data (includes your name, address, email and telephone number, ID number, age, passwords, and technical information)</p>	Delivering Products and Services	Legitimate interests
	Compliance with legal and regulatory obligations	Legal obligation
<p>Website data (including information that we collect automatically like IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information, such as information about how a device has interacted with our website, including the pages accessed and links clicked).</p>	Delivering Products and Services	Legitimate interests
	Providing assistance with Products and Services	Legitimate interests
	Internal analysis	Legitimate interests
<p>Third party data (including information from businesses that provide services to China Unicom Europe (such as usage and billing data) and their suppliers and roaming partners, previous service providers, or other companies in our corporate group. We may also collect information that is publicly available, from public sources like business directories).</p>	Delivering Products and Services	Legitimate interests
	Providing assistance with Products and Services	Legitimate interests
<p>ALL types of data</p>	Compliance with privacy and telecommunications laws	Legal obligation
	Protecting vital interests	Vital interests

D. Disclosure of your information

We may disclose personal information to the following categories of recipients:

- **our group companies:** the information you provide to us will be held on our systems and may be accessed by or transferred to any entity in our corporate group, including any entity that acquires us or that we may acquire. This includes our staff working outside the UK

and third parties, some of whom are located outside the European Economic Area. Such third parties provide localised services and process information, fulfil orders and provide support services on our behalf.

- our **service providers, professional advisers and to such other similar parties**: as we consider necessary for the administration of the Products and Services, the Website and related business, such as, handling order processing and shipments, providing technical support or conducting customer research.
- any **competent law enforcement body, regulatory, government agency, court or other third party**: where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect an individual's vital interests or those of any other person.
- to an actual or **potential buyer** (and its agents and advisers): in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use personal information only for the purposes disclosed in this Privacy Policy.
- to any **other person with your consent** to the disclosure.

International data transfers

Personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective). However, we will always take steps to ensure that your information is used by third parties in accordance with this privacy policy and that we comply with applicable legal requirements to ensure adequate protection for your information.

E. What happens if personal information is not provided?

Where information is needed and personal information is not provided to us, use of our websites or our products and services may be restricted or impossible. For example, we need end user data to control security for our services and to authenticate your right to use our products and services.

F. Marketing

When we undertake marketing to subscribers, we may also have obligations under applicable privacy laws to obtain your consent or to offer you the option to opt-out of our marketing correspondence. We will comply with such laws where they apply. For our corporate customers, we generally do not need consent to market to you and we will offer a right to unsubscribe where that is appropriate.

G. Cookies and similar tracking technology

We use cookies and similar tracking technology (collectively, “**Cookies**”) to collect and use personal information. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Policy.

H. Security

We employ security measures to protect your information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage. The security measures that we employ differ depending on the products and services that you use or the websites that you access. We use measures such as encryption where appropriate.

Where we have given you (or where you have chosen) a password or other authentication details which enable you to use our products and services or access certain parts of our website, you are responsible for keeping your password and other authentication details confidential.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect personal information, we cannot guarantee the security of any information that you disclose online. You accept the inherent security implications of using the internet and we will not be responsible for any breach of security unless we have been in breach of applicable laws and then only to the limits set out in the terms and conditions for the Website.

Our websites 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/web site terms of use and we do not accept any responsibility or liability for these policies. Please check such policies before you submit any information to them.

I. Data retention

We will retain your information for as long as you continue to use the Services and thereafter for a reasonable period or as long as the law requires. We may decide it is necessary to retain your information for the purpose of resolving disputes or payment issues, or because it is still useful to us to analyse your use of the Services.

When we have no ongoing legitimate business need to process personal information, we will either delete or anonymise it or, if this is not possible (for example, because personal information has been stored in backup archives), then we will securely store personal information and isolate it from any further processing until deletion is possible.

For more information about data retention practices, please contact us using the contact details at section K – “How to contact us” – below.

Data protection rights

- If you wish to **access, correct, update or request deletion** of their personal information, you can do so at any time by contacting us using the contact details provided at section K “How to contact us”.

- In addition, you can **object to processing** of your personal information, ask us to **restrict processing** of their personal information or **request portability** of their personal information. Again, they can exercise these rights by contacting us using the contact details provided at section K – "How to contact us" – below.
- Similarly, if we collect and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to **opt-out of marketing communications** we send at any time. This right can be exercised by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided at section section K – "How to contact us" – below.
- You have the **right to complain to a data protection authority** about our collection and use of personal information. For more information, please contact your local data protection authority (Contact details for data protection authorities in the European Economic Area are available [here](#).)

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Certain rights will depend on our legal basis for using your personal information. For example, where we rely on legitimate interests to use your personal information, you will not have the right to request portability of your personal information, but you will have the right to object to our use of it.

We may also have other grounds on which to refuse to comply with data subject requests, in accordance with data protection laws. We will communicate to you if we do not intend to comply with any requests that you make to exercise your data subject rights.

J. Changes to our Privacy Policy

When we update our Privacy Policy, we will take appropriate measures to inform you and your Related Individuals (where appropriate), consistent with the significance of the changes we make. We will obtain consent to any material Privacy Policy changes if and where this is required by applicable data protection laws.

You can see when this Privacy Policy was last updated by checking the "last updated" date displayed at the top of this Privacy Policy.

K. How to contact us

If you have any questions, requests, comments or concerns regarding this Privacy Policy, please contact us using the details below:

Legal Team
Level 35



25 Canada Square
Canary Wharf
London SE14 5LQ
E-Mail: hq-gpd-EULegal@chinaunicom.cn