

## PRIVACY NOTICE

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This Privacy Notice applies to [www.chinatelecomeurope.com](http://www.chinatelecomeurope.com) (hereinafter referred to as 'Website') which is owned and operated by China Telecom (Europe) Limited ('we', 'us') and governs the data collection, processing and usage in relation to your use of this Website. By using this Website, you consent to our data practices described in this statement. If you do not agree to any part of this Privacy Notice, then you should stop accessing this Website.

This privacy notice describes how we collect personal information about users ('you') who use this Website, how we use and protect this information, and your rights in relation to this information. For the purpose of this Privacy Notice, 'Personal information' is information, or a combination of pieces of information, that could reasonably allow an individual to be identified.

### 1. PERSONAL INFORMATION WE USE

Any and all personal information that we may collect will be collected, used and held in accordance with the provisions of General Data Protection Regulation (EU 2016/679). We may collect and process personal information, such as your e-mail address, name, home or work address or telephone number. If you purchase our products and services, we may collect and store billing and credit card information. We may also collect anonymous demographic information which is not unique to you, such as your postal code, age, gender, preferences, interests and favourites.

Information about your computer hardware and software also may be automatically collected by the Website. This information can include your IP address, browser type, domain names, access times and referring website addresses. This information is used by us for the operation of the service, to maintain quality of the service and to provide general statistics regarding use of the Website.

We encourage you to review the privacy statements of websites you choose to link to from this Website, so that you can understand how those websites collect, use and share your information. We are not responsible for the privacy statements or other content on websites not owned and managed by us.

## 2. **HOW WE USE YOUR PERSONAL INFORMATION AND THE BASIS ON WHICH WE USE IT**

We use your personal information primarily to operate the Website and deliver the services. If you contact us and provide us with your contact information, we will also use your information to deal with your enquiries and to provide you with information and updates of our services. We also use personal information to comply with legal obligations to which we are subject and cooperate with regulators and law enforcement bodies.

We also use your personal information to analyse the way in which our services are used, so that we can improve upon our services and develop new services.

We must have a legal basis to process your personal information. In most cases the legal basis will be one of the following:

- (a) to fulfil our contractual obligations to you, for example to provide the services, to ensure that we address your enquiry through the Website. Failure to provide this information may prevent or delay the fulfilment of these contractual obligations.
- (b) to comply with our legal obligations, for example, obligations relating to financial reporting and court orders; and
- (c) to meet our legitimate interests, including to provide the services to our clients (who in turn provide their services to you), to provide you with information, updates or promotion of our services, to understand how our services are used and to enable us to derive knowledge from that to enable us to develop new services and improve our network connectivity. When we process personal information to meet our legitimate interests, we put in place safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms. For more information about the balancing test that we carry out to process your personal information to meet our legitimate interests, please contact us at the details below.

## 3. **YOUR RIGHTS OVER YOUR PERSONAL INFORMATION**

You have certain rights regarding your personal information, subject to local law. These include the following rights to:

- access your personal information
- rectify the information we hold about you
- erase your personal information
- restrict our use of your personal information
- object to our use of your personal information
- receive your personal information in a usable electronic format and transmit it to a third party (right to data portability)
- lodge a complaint with your local data protection authority.

If you would like to discuss or exercise such rights, please contact us at the details below.

#### **4. INFORMATION SHARING**

We may share your personal information with third parties under the following circumstances:

- Service providers and business partners. We may share your personal information with our service providers and business partners that perform marketing services and other business operations for us. For example, we may partner with other companies to provide network services, store data, help optimize our services and analyse information.
- China Telecom group companies. China Telecom works closely with other businesses and companies that fall under the China Telecom Group. We may share your personal information with other China Telecom companies for administrative and internal reporting purposes. A list of companies within the China Telecom Group can be found here: <https://www.chinatelecomglobal.com/global/globalpage2/>.
- Any law enforcement agency, court, regulator, government authority or other third party. We may share your personal information with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party.
- Asset purchasers. We may share your personal information with any third party that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this privacy notice.

Because we operate as part of a global business, the recipients referred to above may be located outside the jurisdiction in which you are located (or in which we provide the services). See the section on "International Data Transfer" below for more information.

#### **5. INFORMATION SECURITY AND STORAGE**

We implement technical and organisational measures to ensure a level of security appropriate to the risk to the personal information we process. These measures are aimed at ensuring the on-going integrity and confidentiality of personal information. We evaluate these measures on a regular basis to ensure the security of the processing.

We will keep your personal information for a reasonable period of time that enables us to:

- Provide the services
- Maintain business records for client reporting, analysis and/or audit purposes
- Comply with record retention requirements under the law
- Defend or bring any existing or potential legal claims
- Deal with any complaints regarding the services

We will delete your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the data.

## 6. **INTERNATIONAL DATA TRANSFER**

Your personal information will be transferred to, stored, and processed in China (including Hong Kong), and may also be transferred to and processed in other jurisdictions which are not regarded as ensuring an adequate level of protection for personal information under European Union law.

We have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your data is adequately protected. For more information on the appropriate safeguards in place, please contact us at the details below.

## 7. **CONTACT US**

China Telecom (Europe) Limited is the controller responsible for the personal information we collect and process.

If you have questions or concerns regarding the way in which your personal information has been used, please contact **ctlegal@chinatelecomglobal.com**.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the data protection authority of the country in which you are a resident using their website.

## 8. **CHANGES TO THE POLICY**

You may request a copy of this privacy notice from us using the contact details set out above. We may modify or update this privacy notice from time to time. If we change this privacy notice in a material way, we will post a notice about this on our website or take other reasonable steps to notify you of the changes.