

Your privacy when using our website

This policy covers our privacy practices in connection with this website (www.three.co.uk) and is intended to let you know about the kinds of information we may obtain about you as a visitor to our website, how we may use that information and who we may share that information with. We are not responsible for the content or privacy practices of other websites.

Each time you access, browse and/or use our website you agree to the following terms. If you do not agree you must cease to use our website.

In this policy references to:

- **"personal information"** is information that is about you and which identifies you;
- **"Three Services"** are the services offered by Three, including, but not limited to, call services, internet access, Messaging Services, Storage Services, Age Restricted Services and Premium Services (such terms as are defined in our terms and conditions with you: www.three.co.uk/terms-conditions/paym-and-payg), which we have agreed to provide to you;
- **"Three"**, **"we"**, **"us"** or **"our"** in this policy means Hutchison 3G UK Limited (company number 03885486) with its registered address at 450 Longwater Avenue, Green Park, Reading, Berkshire, RG2 6GF
- **"Group"** means CK Hutchison Holdings Limited.

We are the data controller of your personal information collected through this website for the purpose of data protection law.

If you have questions about how your personal information is kept or if you wish to exercise one or more of your rights (as set out below) in regards to the personal information we keep on you, please contact our Data Protection Officer ("DPO") at DPA.Officer@three.co.uk or to Hutchison 3G UK Ltd, 450 Longwater Avenue, Green Park, Reading, Berkshire, RG2 6GF.

Three respects your right to privacy and we are committed to complying with applicable data protection and privacy law. We will use appropriate technical and organisational measures to protect your personal information in order to ensure a level of security appropriate to the risk to your personal information.

Collection and Use of Your Personal Information

You agree that any personal information you provide to us will be true, complete and accurate in all respects and you agree to notify us immediately of any changes to it. If you are aged 16 or under, you must get your parent or guardian's consent to provide your personal information to us, otherwise you are not allowed to provide any of your personal information to us.

Your personal information may be used by us, our employees, service providers and disclosed to third parties for the following purposes. For each of these purposes, we have set out the legal basis on which we use your personal information below.

Purpose	Legal Basis for use of your Personal Information
Process any applications or registrations made by you.	The performance of a contract between you and us or in order for us to take steps prior to entering into a contract with you.
To provide products, services and information requested by you.	<p>The legal basis will fall into one of the following four categories, depending on the communication and the purpose for which it was sent:</p> <ul style="list-style-type: none"> • our legitimate business interests in order for us to manage our relationship with you; • performance of a contract between you and us; • consent; and/or • compliance with legal obligations to which we are subject.
To monitor and/or record communications between you and Three for quality control and training purposes.	The processing is necessary for our legitimate business interests to monitor the quality of our customer services and for training purposes.
<p>To conduct credit and fraud checks if you apply for a monthly price plan account, and to help verify your identify and to decide whether to accept your application or future application.</p> <p>In order to process your application, we will supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity.</p> <p>We will also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. Your data will also be linked to the data of your spouse, any joint applicants or other financial associates.</p>	The performance of a contract between you and us or in order for us to take steps prior to entering into a contract with you.

Purpose	Legal Basis for use of your Personal Information
<p>To keep you up to date by post, telephone, email, and direct to your handset by text, picture, video and audio message with information about Three, Three Services, and offers and promotions subject to any marketing preferences indicated by you.</p>	<p>This processing is carried out with your consent or the processing is carried out for our legitimate business interests in order to conduct and manage our business.</p>
<p>To search the records of fraud prevention agencies in assessing any applications for Three Services. If you give us false or inaccurate information and we suspect fraud, we will record this and store the records with fraud prevention agencies.</p> <p>We and other companies may use this information if decisions are made about you on credit or credit-related services.</p>	<p>The processing is necessary for us to comply with our legal and regulatory obligations; or the processing is carried out for our legitimate business interests in order to conduct and manage our business.</p>
<p>To administer your account and provide our customer services.</p>	<p>This processing will be carried out for our legitimate business interests in order for us to manage our relationship with you; or the performance of a contract between you and us.</p>
<p>To manage complaints, feedback and queries.</p>	<p>This processing will be necessary for the performance of our contractual obligations between you and us to comply with our legal and regulatory obligations; and/or our legitimate business interests in order for us to manage our relationship with you and to enable us to improve and develop our business operations and services.</p>
<p>To comply with any legal or regulatory obligations (including in connection with a court order).</p>	<p>This processing is necessary for compliance with legal obligations to which we are subject.</p>
<p>To conduct analysis for traffic and billing management, and to support product development.</p>	<p>This processing is necessary for our legitimate business interests to ensure that we can fulfil our obligations to you which relate to the provision of Three Services and to improve/develop our products and services.</p>
<p>To carry out our obligations arising from any contracts entered into between you and us and to provide you with the products and services requested.</p>	<p>The processing is necessary for the performance of our contract with you.</p>
<p>To contact you for market research purposes.</p>	<p>The processing is carried out for our legitimate business interests because it enables us to develop and improve our website and our products and services offered to you.</p>
<p>To notify you about changes to our website.</p>	<p>This processing is necessary for our legitimate business interests in order for us to manage our relationship with you.</p>

We may be required to obtain your personal information to comply with our legal requirements, to enable us to fulfil the terms of our contract with you or in preparation of us entering into a contract with you. If you do not provide the relevant personal information to us, we may not be able to provide services to you.

Personal information received from other sources

We may receive personal information about you from:

- a) credit reference agencies such as CallCredit, Experian and Equifax including credit information about you (including information from the Electoral Register), and those with whom you are linked financially, to help us verify your identity and decide whether to accept your application or future applications. Such agencies will record details of our search and your application whether your application is successful or not. We and other organisations may use any of this information to make other credit decisions about you and other members of your household, and for identification purposes, debt tracing and the prevention of money laundering as well as the management of your account;
- b) 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
- c) commercial partners who supply goods and services to us.

Credit reference checks

In order to process your application, we will perform credit and identity checks on you with one or more credit reference agencies ("CRAs").

To do this, we will supply your personal information to CRAs and they will give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We will use this information to:

- Assess your creditworthiness and whether you can afford to take the product;
- Verify the accuracy of the data you have provided to us;
- Prevent criminal activity, fraud and money laundering;
- Manage your account(s);
- Trace and recover debts; and
- Ensure any offers provided to you are appropriate to your circumstances.

We will continue to exchange information about you with CRAs while you have a relationship with us. We will also inform the CRAs about your settled accounts. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs.

When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders.

If you are making a joint application, or tell us that you have a spouse or financial associate, we will link your records together, so you should make sure you discuss this with them, and

share with them this information, before lodging the application. CRAs will also link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the CRAs to break that link.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail in the Credit Reference Agency Information Notice (“CRAIN”). CRAIN is also accessible from each of the three CRAs – clicking on any of these three links will also take you to the same CRAIN document: Callcredit www.callcredit.co.uk/crain; Equifax www.equifax.co.uk/crain; Experian www.experian.co.uk/crain.

Automated decision making

As we've mentioned above, when you apply for a Pay Monthly plan, we will obtain information from a credit reference agency, which will be used in an automated decision process to determine whether we can enter into a contract with you. If you wish for the decision to be reassessed by a person, you may do so by calling our customer services team on 0333 338 1001 or by writing to: Three Customer Services, Hutchison 3G UK Ltd, PO Box 333 Glasgow G2 9AG. You can also object to a decision being taken solely by automated processing (see heading Your Rights below).

Retention of data

We will 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 Three Services, we may hold your Communications Data for 12 months for legitimate business purposes (or longer in connection with any legal proceedings or disputes).

Disclosure

Your personal information may also be processed by:

- our business partners, suppliers and sub-contractors for the performance of any contract we enter into with you. For example we engage third parties to process applications, perform fraud and credit checks, to carry out surveys and depersonalised marketing activities;
- other members of our Group;
- other professional advisers (including accountants and lawyers) that assist us in carrying out our business activities;
- police and other law enforcement agencies in connection with the prevention and detection of crime;
- other external agencies and organisations (including the National Crime Agency) for the purpose of preventing and detecting fraud (including fraudulent transactions), money laundering and criminal activity; and
- third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation or instructions of a regulatory body (including in connection with a court order), or in order to enforce or apply the terms of any agreements we have with or otherwise concerning you (including agreements between you and us) or to protect our rights, property or safety of our customers, employees or other third parties.

- We may also disclose your personal information to other third parties, for example:
 - in the event that we sell or buy any business or assets we will disclose your personal information to the prospective seller or buyer of such business or assets;
 - if we or substantially all of our assets are acquired by a third party (or are subject to a reorganisation within our Group), personal information held by us will be one of the transferred assets; and
 - if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply the agreements concerning you (including agreements between you and us).

Where will we transfer your personal information

Your Information will be processed both within and outside the European Economic Area (EEA). Where we transfer Your Information outside of the EEA, we will implement appropriate and suitable safeguards to ensure that such personal information will be protected as required by applicable data protection law. These measures generally include:

- (a) Commercial terms to safeguard the processing of Your Information.
- (b) Technical security standards commensurate the nature of data being processed.

For further information as to the safeguards we implement please contact our DPO at the address detailed above.

Collection and use of technical information

We use session cookies which enable a visitor's web browser to 'remember' which pages on this website have already been visited. We may also map and analyse visitor usage patterns to help us develop the website and enhance a visitor's experience.

Depending on the type of browser you are using, you may be able to configure your browser:

- (i) so that 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. For further information regarding the cookies that we use and how to block cookies please see our [cookies policy](#).

We may collect and store certain 'technical information' about your visit to this site, such as:

- the IP address from which you access this website;
- the type of browser and operating system used to visit this website;
- the date and time of your visit(s) to this website;
- clickstream data which reveals the activities of visitors around this website (for example the web pages you access and products browsed) and;
- the website address of the website from which you accessed this website.

Such data is used only to analyse trends, administer and improve our website and the services we offer, track movement through our website and gather statistical information about visits to the website.

Collection and use of information for fraud and security purposes

We use the hCaptcha anti-bot service (hereinafter "**hCaptcha**") on our website. This service is provided by a third party, Intuition Machines, Inc. ("IMI").

hCaptcha is used to check whether the data entered on our website (such as on a login page or contact form) has been entered by a human or by an automated program. By using this service, we improve the integrity of our website and it helps us to protect your data.

For more information about hCaptcha and IMI's privacy policy and terms of use, please visit the following links: <https://hcaptcha.com/privacy/> and <https://hcaptcha.com/terms>.

Your Rights

You have certain rights with respect to your personal information. The rights may only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights. You can exercise these rights using the contact details above (under the heading "Your privacy when using our website").

	Summary of your rights
Right of access to your personal information	<p>You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.</p> <p>You can download the Request for Access to Personal Information form here. If you can't download the form, we can send you a copy - please call us on 333 (Free, unless you're on one of our new Essential Plans, in which case it will come out of any available minutes allowance or charged at your out of allowance rate of 35p per minute) from a Three phone or 0333 338 1001 from any other phone*</p> <p>*Standard call rates apply.</p>
Right to rectify your personal information	<p>You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.</p>
Right to erasure of your personal information	<p>You have the right to ask that your personal information be deleted in certain circumstances. For example (i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation. You can download the Request for Erasure Form here.</p>

	Summary of your rights
Right to restrict the use of your personal information	You have the right to suspend our use of your personal information in certain circumstances. For example (i) where you think your personal information is inaccurate and only for such period to enable us to verify the accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or (iv) you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.
Right to data 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 here .
Right to object to the use of your personal information	You have the right to object to the use of your personal information in certain circumstances. For example (i) where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party) including for profiling; and (ii) if you object to the use of your personal information for direct marketing purposes, including profiling (to the extent it relates to direct marketing).
Right to object to decision which is based solely on automated processing	You have the right in certain circumstances not to be subject to a decision which is based solely on automated processing without human intervention.
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.
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 Three, the Information Commissioner's Office, where you think we have not used your personal information in accordance with data protection law.

Other terms and conditions

You should read this policy in conjunction with our website terms and conditions (which apply to your use of this website), any terms of sale which apply to the purchase of products by you via this website and the Terms for Three Services (which apply to your use of Three Services). Our customer privacy statement concerning your use of Three Services is contained within the 'Privacy Notice' found in Section 13 of our Terms for Three Services.

Notification of changes

If we change this policy, we will post the amended policy on our website so that you are always aware of how we collect, use and disclose your personal information.

This policy was last updated on 18 March 2022.

Glossary of technical terms used

- **Web Browser** - The software you use to read web pages such as Microsoft Internet Explorer, Netscape Navigator and Opera.
- **IP address** - The identifying details for your computer (or your internet company's computer), expressed in "internet protocol" code (for example 192.168.72.34). Every computer connected to the web has a unique IP address (which may be permanent or change each time you access the internet).
- **Cookies** - Small pieces of information, stored in simple text files, placed on your computer by a web site. Cookies can be read by the web site on your subsequent visits. The information stored in a cookie may relate to your browsing habits on the web page, or a unique identification number so that the web site can "remember" you on your return visit. Generally speaking, cookies do not contain personal information from which you can be identified, unless you have furnished such information to the web site.