

## Three App Privacy Policy

This app privacy policy (“**Privacy Policy**”) covers Three’s privacy practices in connection with your use of the Three mobile application software (“**Three app**”) which is available for download in the App Store and on Google Play.

References to “Three” in this Privacy Policy mean Hutchison 3G UK Limited. References to “Partners” refers to Zeotap Ltd and Emodo Ltd.

### 1. Other terms and conditions

This Privacy Policy should be read in conjunction with the following terms and conditions, which are incorporated into and form part of this Privacy Policy:

1. Three’s [terms and conditions of use of its website](#), which apply to your use of Three.co.uk.
2. Your [network terms and conditions](#), which apply to your use of Three’s network and services. In particular, please review our ‘Privacy Notice’ at section 13.
3. Three’s [Cookies Policy](#), which sets out the cookies used on Three.co.uk.

### 2. General statement

Three respects your right to privacy and we are committed to complying with applicable data protection and privacy law. We will only collect information about you with your awareness and permission. Any personal information which you provide to us and/or which we obtain about you will be kept secure and confidential using appropriate technical measures and by ensuring staff are trained and aware of how to protect your data.

### Updates to this policy

#### Latest updates to this policy

This is version 5 of the policy, which was updated on, and became effective as of, 3 August 1 2022, to reflect the change to Three’s registered office address.

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 at [Three.co.uk/terms](https://www.three.co.uk/terms) within the section entitled “Privacy & Cookies”, which will be accessible from a link within the Three app so you will always 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.

## **Privacy commitment**

Before we get started, we want to make a commitment to you as a Three app user. At Three, we respect your right to privacy and value your trust. That's why we've developed the following set of principles that underpin how we handle your personal information:

- We will be clear with you on how we collect, store, use and share personal information about you.
- We will provide you with the tools to control, access and update your personal information.
- We will keep your personal information secure and confidential.

### **3. What is the Three app?**

The Three app provides a variety of services to you as a Three customer, including:

1. Access to your authenticated My3 account data, which is downloaded from [www.three.co.uk](http://www.three.co.uk) and displayed in the Three app (including the ability to review your allowances, current usage, extra charges incurred since your last bill, and your next bill date) provided that you are using your Three SIM and have access to an active cellular data connection to Three's network.
2. Access to your plan information (including the plan name, minimum term end date, monthly charge, allowance information, active add-ons, the ability to buy an add-on, and upgrade eligibility information).
3. Access to your bills from the previous 12 months.
4. Links to useful pages hosted at [www.three.co.uk](http://www.three.co.uk) with information on your payment options, your account information, and other support.
5. Live chat for quick support.
6. In-app campaigns, offers and content made available to you, provided that you have selected this function to be active.
7. This app offers you the ability to manage how Three uses your data for additional services such as providing you with more relevant adverts or offers from our partners. Find out more at section 6 below.

## **4. Collection and use of your personal information**

Where you have provided consent we will collect and use the following information:

### **4.1 Personal information you give us**

The Three app displays your My3 account data, which is collected through your use of Three's service and is downloaded within the Three app from [www.three.co.uk](http://www.three.co.uk). As such, the

Three app does not itself provide users with a means of giving us personal information, with the exception of your use of the following in-app forms/functions:

1. **Move your number:** This in-app form submits to Three a request to move your existing number to Three.
2. **Change payment date:** This in-app form submits to Three a request to change your payment date after your first bill
3. **Verify your email (Registration)** – This in-app form submits to Three a request to send you an email reminder in case you forget your password to access the app.

The information you give us through your use of the above forms/functions within the Three app includes your name, date of birth, post code and email address. We will use this information for the purpose of assessing and responding to your request to move your number, change your payment date or send you a password reminder.

We may also use your email address for marketing purposes, but only in accordance with your marketing preferences. You can change these in the app at any time by going to the 'More' tab and selecting 'Edit personal details'.

For other functions made available by the Three app (including paying bills and topping-up) we will link you to [www.three.co.uk](http://www.three.co.uk) where you may provide us with information including your name, address, email address, mobile number, date of birth, financial and credit/debit card information. Where you are sent via a link from the Three app to [www.three.co.uk](http://www.three.co.uk), the terms and conditions set out in the section "Other terms and conditions" above shall apply.

## 4.2 Information we collect about you

### Authentication information

When you use the Three app, we will automatically carry out authentication checks to make sure that you are a Three customer with an active cellular data connection to Three's network. During authentication, we will identify your mobile number, account number, account type in order to set up the Three app and download your My3 account data from [www.three.co.uk](http://www.three.co.uk), which will be displayed within the Three app.

### My3 account, technical, and device information

In addition, we will automatically collect the following information:

1. Your My3 account data from [www.three.co.uk](http://www.three.co.uk), including your mobile number, account number, account type, plan, allowances, current usage, billing and other account information. We will use this to display your My3 account data within the Three app.

2. 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 Three app and the services we offer, track user movement through the Three app and gather statistical information about visits to, and active use of, the Three app.
3. Information from your device, where you have granted the relevant operating system permissions. These include:

If you are an Android device user, you may have specifically enabled the following permissions:

- a. **READ\_PHONE\_STATE**: We will use this to determine information about the cellular connection status of your device. This will enable Three to download your My3 account data and display it within the Three app.

If you are an iOS device user, you may have specifically enabled push notifications. We may use these to send relevant communications about Three services.

### **Location data**

Where you have enabled Location Services for the Three app via the permissions on your Android or iOS device, we may use and process your location data when you use the Store Locator function within the Three app, which identifies the Three store nearest to you, and at other moments from time to time. You can manage your location preferences at any time via your Android or iOS device.

## **5. Keeping your device and Three app secure**

You are responsible for the security of your device and must make sure that you keep it secure. To prevent unauthorised access to your device and Three app, you must keep any passwords and PIN numbers relating to your device and Three account safe and secure. You must not share them with anyone else. If you find or suspect that anyone else knows your passwords or PIN numbers, or has access to your Three app without your permission, you must contact us immediately.

## **6. How and why we use your personal information**

Before we get into the specifics, it's important that we explain some basic principles relating to how we can use your personal information. In addition to explaining how we will use your personal information and why we will use your personal information (i.e. the specified purpose for using your personal information), we must also tell you our "lawful basis" for using your personal information. By "lawful basis" we really mean our legal reason for using your information. This will be one of 3 legal reasons:

- Where you **consent** to us processing and using your personal information for one or more specified purposes.

- Where using your personal information is necessary for the **performance of a contract** to which you are a party.
- Where using your personal information is necessary for the purposes of our (or a third party's) **legitimate interests**, provided that this is not overridden by your interests or fundamental rights.

For each use we make of your personal information, we have set out below why we use your personal information, how we use your personal information, and our legal reason for using your personal information. Where appropriate, we have also given a practical example.

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 Three and our partners
How we'll use your data:	<p>With your consent, we'll create a unique profile of you and your interests from:</p> <ol style="list-style-type: none"> <li>1. Information we know about you as a Three network customer.</li> <li>2. Information you tell us when you use the Three app</li> <li>3. Information we infer about your interactions with the app.</li> <li>4. Information from your web browsing activity, app usage, and location (provided you consent).</li> <li>5. Information provided to us by third parties who have your consent to share your information.</li> </ol> <p>We'll match and combine each of the above information sources to really get to know you and your interests.</p>
Our legal reason:	Consent, which you can withdraw at any time by accessing your 'Settings' in the Three app
Practical example:	Use your device for playing games, then we can advise you on the best devices to bring you a great gaming experience

2 – Location	
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Why we use your data:	To bring you a better customer experience, improving our network performance and bringing you timely, location-based products, services, and promotions.
How we'll use your data:	If we know where you use your device, then it can help us improve our network and other products and services where you need it. We may also include the use of motion data from your device to bring you the best location based services as accurately as possible. We will collect the information from your IP address, your device Global Positioning System, or other sensors like WiFi and mobile towers, magnetic fields, gyroscope and acceleration
Our legal reason:	Consent, which you can withdraw at any time by accessing your 'Settings' in the Three app
Practical example:	We can tell you when your local Three store has special offers on cool stuff that you'll love

3 – Web Browsing	
Why we use your data:	To bring you a better customer experience, by bringing you personalised product offerings, discounts and rewards based on your interests.
How we'll use your data:	We use cookies and similar technologies to collect and store information on your internet use, your browser and your device. For more information, please see the section entitled 'Cookies and similar technologies' below.
Our legal reason:	Consent, which you can withdraw at any time by accessing your 'Settings' in the Three app
Practical example:	A keen runner, we can help you choose the right headphones to let you listen to great sounds on the move

4 – Relevant Advertising	
Why we use your data:	Advertising is an important part of the internet. It's what funds your favourite apps and websites and keeps them free for you. We can't change how many adverts you see online, but we can share your information with our chosen technology partners, Zeotap and Emodo, to try and make the advertising you see as useful and relevant as possible. Advertisers define who they want to reach based on factors such as interests, age, location, information about device (inc make and model) it's operating system, 3 app versions and available sensors. Using this information they can show their ads to the most relevant people.
How we'll use your data:	With your consent, Three and our partners may:

	<ol style="list-style-type: none"> <li>1. Share your Advertising Id with third parties. That identifier can be used to direct content to your phone.</li> <li>2. Build a profile from the information we share to deliver personalised content</li> <li>3. Include you in digital advertising or marketing campaigns including the delivery of personalised content.</li> <li>4. Use consented information in reporting and in product improvements.</li> </ol>
Our legal reason:	Consent, which you can withdraw at any time by accessing your 'Settings' in the Three app

5 – Marketing Three products and services	
Why we use your data:	At Three we have incredible deals that we don't want you to miss out on. With your permission, we want to send you emails and/or the odd push/in-app notification within the Three app about the products we have to offer.
How we'll use your data:	With your consent, we'll use your unique profiles to bring you information from Three on products, services and offers we know you'll love
Our legal reason:	Consent, which you can withdraw at any time by accessing your 'Settings' in the Three app
Practical example:	We can bring you information on the latest plans and devices from Three to make sure you don't miss out

6 – Marketing 3 <sup>rd</sup> parties	
Why we use your data:	To bring you a better customer experience, by bringing you tailored messages on offers from our partners on products you'll love
How we'll use your data:	<p>We never share your personal information with any of our partners.</p> <p>With your consent, we'll use your unique profiles to bring you messages from our partners that we know you'll love</p>
Our legal reason:	Consent, which you can withdraw at any time by accessing your 'Settings' in the Three app

Practical example:	We can bring you information on the latest releases from Netflix that you can enjoy as part of Go Binge. We wouldn't want you to miss out
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7 – Sharing data with Three companies	
Why we use your data:	Interested in cool offers from brands like Superdrug, Savers and the Perfume Shop? Three is part of the same family of companies as these great brands and more and by sharing your information between our family of companies we and they can bring you fantastic products, services and promotions
How we'll use your data:	With your consent, we will: <ol style="list-style-type: none"> <li>1. Mask your personal data (e.g. email address and your interests) to keep the data secure</li> <li>2. Load this information into a secure area that can be accessed by Three and our sister companies</li> <li>3. Allow us to combine your information with their information to bring you tailored offers</li> <li>4. Share anonymous and aggregated user information to our trusted partners for service improvements.</li> </ol>
Our legal reason:	Consent, which you can withdraw at any time by accessing your 'Settings' in the Three app
Practical example:	Knowing the brands you love as part of the Superdrug loyalty scheme, we can help you earn great offers and discounts on these brands.

8 – Marketing Suppressions	
Why we use your data:	To ensure you don't receive unnecessary marketing messages about Three products you already know about. when you're online with Google, Facebook, Instagram and Twitter
How we'll use your data:	With your consent, we will: <ol style="list-style-type: none"> <li>1. Mask your personal data to keep the data secure from external sources</li> </ol>

	<p>2. Load this information into a secure area that can be accessed by Three and Google</p> <p>3. Exclude you from Three advertising that is not relevant for you when visiting these social media sites.</p>
Our legal reason:	Consent, which you can withdraw at any time by accessing your 'Settings' in the Three app
Practical example:	Already have a monthly contract with the latest iPhone from us, then we won't market similar products to you when you're online

9 – Analyse user trends and usage of the 3 app	
Why we use your data:	We use analytics software (eg <b>Adobe Analytics</b> ) to track usage throughout the Three app. This helps us to analyse trends and improve the Three app
How we'll use your data:	We will monitor and track usage information.
Our legal reason:	Legitimate interests.

10 – Maintain, develop, improve, operate and deliver the 3 app and services	
Why we use your data:	To maintain, develop, improve, operate and deliver the 3 app and services.
How we'll use your data:	We will use <b>Medallia</b> customer experience software to provide customer satisfaction surveys to you. This helps us to gather and analyse customer feedback about, and improve, the Three app.
Our legal reason:	Legitimate interests.

### Your choices about how we collect and use your personal information

Your right to privacy has been fundamental to the design of the 3 app. Where our use of your personal information is based on your consent, you can easily withdraw your consent at any time within the app.

Managing your consent preferences

To manage your consent preferences, all you need to do is access 'More' tab within the 3 app where you can, with one click, enable or disable any of: user profile, location, web browsing, relevant advertising, Marketing Three products and services, Marketing 3<sup>rd</sup> parties, Sharing data with Three companies, Marketing Suppressions.

## 7. Caching

This is the storing of certain app data on your device. Specifically, we cache app settings and My3 account data to ensure the Three app can be used while offline, to improve performance and reduce battery and network drain.

## 8. 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").

	<b>Summary of your rights</b>
	<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 <a href="#">here</a>. 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>
<b>Right to rectify your personal information</b>	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.
<b>Right to erasure of your personal information</b>	<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.</p> <p>You can download the Request for Erasure Form <a href="#">here</a>.</p>
<b>Right to restrict the use of your personal information</b>	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.
<b>Right to data portability</b>	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 <a href="#">here</a> .
<b>Right to object to the use of your personal information</b>	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).
<b>Right to object to decision which is based solely on automated processing</b>	You have the right in certain circumstances not to be subject to a decision which is based solely on automated processing without human intervention.
<b>Right to withdraw consent</b>	You have the right to withdraw your consent at any time where we rely on consent to use your personal information.
<b>Right to complain to the relevant data protection authority</b>	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.

## Contact us

Please feel free to contact us using the contact details below if you:

- Have any questions about this policy or how we collect, store, use and share your personal information.
- Wish to exercise any of the rights detailed in the section entitled 'Ways you can access, control and correct your personal information'.

**Email:** [DPA.Officer@three.co.uk](mailto:DPA.Officer@three.co.uk)

**Post:**

FAO Data Protection Officer  
Hutchison 3G UK Limited  
450 Longwater Avenue  
Green Park  
Reading  
Berkshire  
RG2 6GF

**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.