

Privacy Policy

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This Privacy Notice applies to **www.chinatelecomeurope.com** (the "Website"), 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 the 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 may also be automatically collected by the Website, including your IP address, browser type, domain names, access times and referring website addresses. This information is used to operate the service, maintain quality, and 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 provide you with information and updates on our services. We also use personal information to comply with legal obligations and to cooperate with regulators and law enforcement bodies, as well as to analyse the way our services are used so that we can improve upon 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:

- To fulfil our contractual obligations to you — for example, to provide the services and address your enquiry through the Website. Failure to provide this information may prevent or delay the fulfilment of these obligations.
- To comply with our legal obligations — for example, obligations relating to financial reporting and court orders.
- To meet our legitimate interests, including providing services to our clients, providing you with information or promotions, and understanding how our services are used so we can develop new services and improve network connectivity. Where we rely on legitimate interests, we put safeguards in place to ensure your privacy is protected and that our interests do not override your rights and freedoms. For more on this balancing test, please contact us using 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 right 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 (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** that perform marketing services and other business operations for us, such as network services, data storage, service optimisation, and information analysis.
- **China Telecom group companies** — for administrative and internal reporting purposes. A list of companies within the China Telecom Group can be found at chinatelecomglobal.com.
- **Law enforcement agencies, courts, regulators, or government authorities**, where we believe this is necessary to comply with a legal or regulatory obligation, or to protect our rights or the rights of third parties.
- **Asset purchasers** — any third party that purchases or receives all or substantially all of our assets and business. We will use reasonable efforts to ensure such recipients handle your data consistently with this notice.

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

5. Information Security and Storage

We implement technical and organisational measures appropriate to the risk of the personal information we process, aimed at ensuring the ongoing integrity and confidentiality of that information. We evaluate these measures regularly to ensure the security of processing.

We will keep your personal information for a reasonable period to enable 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. Where we are unable, for technical reasons, to delete information entirely from our systems, we put appropriate measures in place to prevent any further processing or use of that 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 not regarded as ensuring an adequate level of protection under European Union law.

We have put appropriate safeguards in place (such as contractual commitments) in accordance with applicable legal requirements to ensure your data is adequately protected. For more information on these safeguards, 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.

Questions or concerns regarding the use of your personal information can be directed to:
ctlegal@chinatelecomglobal.com

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

8. Changes to the Policy

You may request a copy of this privacy notice using the contact details above. We may modify or update this privacy notice from time to

time. If we change it in a material way, we will post a notice on our website or take other reasonable steps to notify you of the changes.