

Privacy Notice for Sure (Diego Garcia) Limited.

Sure is committed to protecting your privacy. We take our responsibility to safeguard and secure your personal information very seriously. This Privacy Notice, together with our website terms and conditions and any other documents referred to in it, and this Privacy Notice has been created to explain how we use your data, why we use it and who we share it with in relation to our services.

Sure comprises a group of companies which operates in several jurisdictions worldwide. More information on the subsidiaries within the Sure group of companies can be found [here](#).

Data Controllers

Diego Garcia

Sure (Diego Garcia) Limited
c/o Coson Corporate Services Limited, Cedar House, 3rd Floor, 41 Cedar Avenue,
Hamilton HM 12, Bermuda.
Incorporated and registered in Bermuda with registered number 39188.

This Privacy Notice is issued on behalf of the members of the Sure Group in Diego Garcia so when we mention Sure, "we", "us" or "our" in this Privacy Notice, we are referring to the relevant company in the Sure Group responsible for processing your personal information.

Data Protection Officer

Sure has appointed a designated Data Protection Officer to have oversight of data protection. Their contact details are as follows:

Address:

The Data Protection Officer
Sure
The Powerhouse
Queens Road
St Helier
Jersey
JE2 3AP

Email: dataprotection@sure.com

Types of Personal Data we Process

- Contact details including name, gender, date of birth, installation address, land line and mobile phone numbers and email addresses and billing address.
- Information about the services you contract for with Sure;
- Traffic data: i.e. details of your use of our services (for example, where you contract for telephony services we may record the date that calls were placed by you as well as the duration of each call).
- Billing information such as number of calls, duration, category of call, numbers of SMS, roaming usage and other service information used to calculate your bill.
- Financial information such as bank account details and credit and debit card information for receipt of payments. Card information is not stored by Sure.
- When you visit our Retail Store in each relevant jurisdiction, we may collect details of the visitors who attended, the time and date of the meeting and CCTV footage.
- Recordings of phone calls to our Customer Service Centre and Service Operations Centre as well as other communications such as email and electronic messaging which may be used for staff training and audit purposes.
- Information regarding the employees and agents of our Enterprise customers, their roles and contact details.
- Generic location data related to mobile services such as mobile sites with which phone has connected, countries visited when roaming.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

Sources and Recipients of Personal Data

Sure may disclose your personal data to other Sure group companies, and carefully selected business partners and third-party suppliers to whom we engage to provide services set out in this Privacy Notice, including Directory Services. However, other than as set out in this Privacy Policy, Sure will not disclose or share your personal data with any third party without your express consent unless this is necessary to provide the service or products you requested, to undertake the legitimate interest of Sure, or as required by law.

Transfers of Personal Data to Third Countries

As Sure is part of an international group of companies operating globally we may store your personal data in your home country and/or we may transfer your personal data to other Sure group companies and carefully selected business partners and third-party suppliers in other countries around the world where it has your consent or where it is necessary to do so to conclude or perform a contract on your behalf. In all cases we will ensure the security of the transfer of your data. These may include:

- Suppliers who support our services to you such as billing
- Suppliers who support the security of our telecommunications infrastructure and services we provide to you
- Our parent company
- Audit firms and certification bodies working for ourselves and / or our parent company
- Third parties to whom you have authorised your data to be disclosed.

In the event that data is being transferred include personal data we will ensure that the relevant requirements of any applicable data protection laws are met.

Period Data Will be Stored

Sure Group only keeps data for as long as necessary to fulfil the purpose it was collected including for the purposes of satisfying any legal, accounting, or reporting requirements. In most cases no personal data will be held on an individual who is no longer a Sure customer after 10 years. There may be limited exceptions where some information is required to be kept longer such as if there was an ongoing legal dispute or we were required to hold your data longer by law.

Any requests for further information in relation to the continued processing of specific data, or requests for destruction of data should be made to the Sure Data Protection Officer.

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data (including address or name) changes during your relationship with us.

Changes to our Privacy Policy

We may make changes to our Privacy Notice from time to time. We will post any changes to this policy online at www.sure.io.

Use of cookies

Sure may use "cookies" on its website(s). A "cookie" is information that a website puts on your hard drive so that it can remember pieces of information about you when you next visit the website or a related website. Sure uses cookies to record personal data about you when you use its website to facilitate your future activities. Unless otherwise notified by Sure, Sure will not use personal data sent in a cookie for marketing purposes and will not share this personal data with third parties. If you prefer not to receive cookies from Sure's website, you can set your browser to warn you before accepting cookies and refuse the cookie when your browser alerts you to its presence. You can also refuse cookies by turning them off in your browser, but this may impair your experience of Sure's website. Further information on cookies and how to control their use can be found at www.aboutcookies.org.

Complaints

If you wish to raise a complaint regarding our processing of your data you may do so by writing to our Data Protection Officer at the address above or emailing dataprotection@sure.com.