

Red 27 Mobile

Red27Mobile Ltd. The Shepherds Building, Rockley Road, London, W14 0DA. UK

Privacy Policy

Introduction

Red27Mobile Ltd (“RED27”) with company number 10831204 and having registered address at Shepherds Building, Rockley Road, London, W14 0DA, respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data. Red27Mobile Ltd will process any information we collect from you, or which you provide to us, in the course of using any service(s) provided by Red27Mobile Ltd. For the purpose of the EU General Data Protection Regulations (2016/679) 2018 RED27 is the data controller.

The Company is committed to protecting your privacy and handling your personal data in an open and transparent manner. The personal data that we collect (if any) and process will vary depending on how you purchase or subscribe to our goods and services, either via text message or via alternative method (collectively “Services”)

Purpose of this privacy policy

This privacy policy aims to give you information on how RED27 collects and processes your personal data through your use of our Services, including any data you provide and tells you about your rights under the General Data Protection Regulation (“GDPR”).

For the purposes of this privacy policy:

- when we refer to “personal data” or “personal information” we mean data which identifies or may identify you and which may include, for instance, your email or IP address;

- when we refer to “processing” we mean the handling of your personal data by us, including collecting, protecting and storing your personal data; and
- when we refer to “sensitive data” we mean personal data which may reveal information about racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, genetic or biometric data.

Controller

RED27 Ltd is the controller of your personal data and we have appointed a data protection officer (“DPO”) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, please contact the DPO using the details set out below.

If you have any questions, comments and/or requests regarding this privacy policy or wish to obtain more details in relation to the personal data we process about you, please contact us by sending an email to support@red27mobile.com

You have the right at any time to make a complaint to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would however, appreciate the opportunity to deal with any concerns before you approach the ICO and ask that you contact us in the first instance.

The personal data we may collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, last name, username or similar identifier, title and date of birth.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us or third parties using our solution either on our site or their own.
- Profile Data includes your username and password, purchases or orders made by you, your feedback and survey responses.
- Usage Data includes information about how you use our Services.

- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature on any part of the Services. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

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). Nor do we collect any information about criminal convictions and offences.

If Subscribers fail to provide their personal data

Where we need to collect and process your personal data in order to provide you with our Services and you fail to provide that data when requested, we may not be able to provide you with access to our Services we offer. In this case, we may have to cancel your subscription.

Why we need your personal data and how we use it

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

You have the right to withdraw consent at any time by contacting us at support@red27mobile.com

Retention of your personal data

We take appropriate measures to ensure that any personal data is kept secure and retained for only as long as is necessary for the purpose for which it is used, ensuring compliance with GDPR and the Data Protection Act.

If your personal details change or if you have any queries about how we use your personal data please contact us at support@red27mobile.com

We will conduct periodic review of the data we hold about customers to ensure that we do not withhold personal data for any longer than necessary.

Data Storage

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology.

We take your privacy very seriously and will take all reasonable steps to protect your personal data, but please be aware that any data which you send to our service(s) or site(s) is sent at your own risk.

The data that we collect from you may be transferred to, processed and/or stored at a destination outside the European Economic Area ("EEA"). By submitting your personal data, you agree to this. We will take all reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy.

Who we share your personal data with

It is our policy not to use or share personal data about you in ways unrelated to those described in this privacy policy without also providing you with an opportunity to opt out or otherwise object to such unrelated uses. However, we may disclose personal data about you, or information regarding your use of the Services to third parties for any of the reasons set out hereinabove, or if we are legally required to do so, or if we are authorized under our contractual and statutory obligations. When we disclose your personal data to service providers, we will ensure that they are bound by a contract requiring them to comply with their GDPR obligations.

We may also disclose aggregated information about our users, and information that does not identify any individual, without restriction. We also may share aggregated information with third-parties for conducting general business analysis. This information does not contain any personal data and may be used to develop content and services that we hope you and other users will find of interest.

We may share your personal data with the parties set out below for the purposes set out in the table Purposes for which we will use your personal data above.

- Internal Third Parties
- External Third Parties

- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and are subject to a duty of confidentiality. All of our data is protected with end to end encryption by default.

There are in place robust procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are set out in the table Purposes for which we will use your personal data above.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights include but are not limited to:

- Request access to your personal data;
- Request correction of your personal data;
- Request erasure of your personal data;
- Object to processing of your personal data;
- Request restriction of processing your personal data;
- Request transfer of your personal data; and
- Right to withdraw consent

If you wish to exercise any of the rights set out above, please contact us at support@red27mobile.com

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers acting as processors who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.

- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.