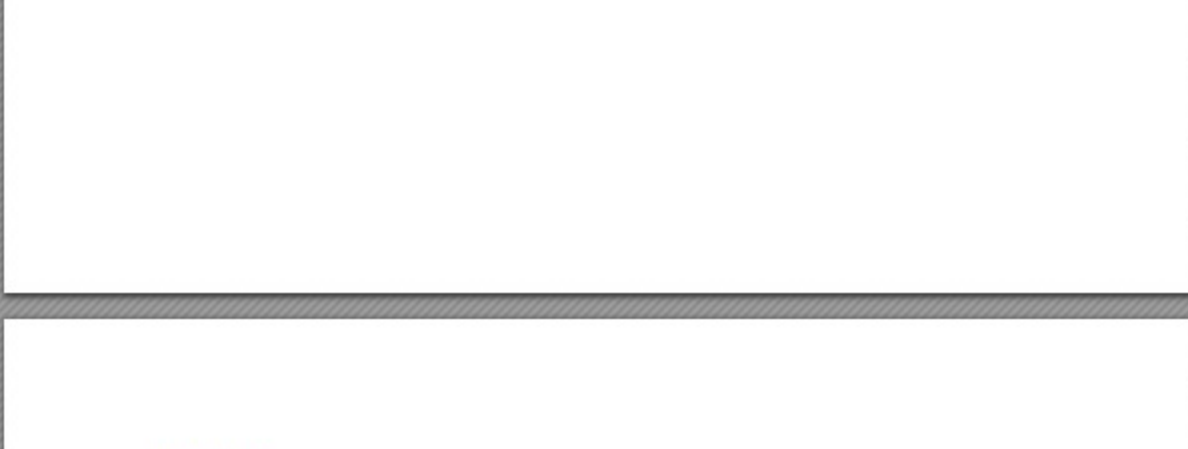




## MBNL Landlord Privacy Notice

This notice sets out how we handle landlord personal data as part of our General Data Protection policies (GDPR).



### SUMMARY

This Privacy Notice applies to:

- users of our website who submit general enquiries
- individuals who make an enquiry to, or interact with, MBNL
- landlords of electronic communications sites on which network equipment of MBNL, EE and/or H3G is located, installed or used ("Landlords")
- individual contacts at our suppliers or individual suppliers ("Suppliers")

We process your Personal Data to respond to general enquiries sent to MBNL and to manage our relationship with Landlords and Suppliers.

This Privacy Notice explains what Personal Data we process, why, how it is legal and your rights.

### ABOUT US AND THIS PRIVACY NOTICE

This Privacy Notice is provided by Mobile Broadband Network Limited ("MBNL" or "we" or "us") at 6th floor, Thames Tower, Station Road, Reading RG1 1LX who is a "controller" for the purposes of the Data Protection Laws.

We are responsible for, and control the processing of, your Personal Data.

We take your privacy very seriously. We ask that you read this Privacy Notice carefully as it contains important information about our processing of your Personal Data and your rights.

### How to contact us

If you need to contact us about this Privacy Notice or would like this Privacy Notice in another format (for example, audio, large print, braille), please use the details below:

Privacy Owner: Jonathan Walto  
Address: 6th floor, Thames Tower, Station Road, Reading RG1 1LX  
Telephone number: 07468174071  
Email: Jonathan.Walto@mbnl.co.uk

### Changes to this Privacy Notice

The latest version of the Privacy Notice can be found at <https://mbnl.co.uk/>. We may change this Privacy Notice from time to time. We will alert you on the website when changes are made or e mail you if the change affects you.

Current version: 11 May 2018.

### USEFUL WORDS AND PHRASES

Please familiarise yourself with the following words and phrases as they have particular meanings in the Data Protection Laws and are used throughout this Privacy Notice.

Controller	means any person who determines the purposes for which, and the manner in which, any Personal Data is Processed
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Criminal Offence Data	means any information relating to criminal convictions and offences committed or allegedly committed
Data Protection Laws	means the laws which govern the handling of Personal Data. This includes the General Data Protection Regulation (EU) 2016/679 and any other national laws supplementing that Regulation or related to data protection
Data Subject	means the person to whom the Personal Data relates
ICO	means the UK Information Commissioner's Office which is responsible for implementing, overseeing and enforcing the Data Protection Laws
Personal Data	means any information from which a living individual can be identified. This will include information such as telephone numbers, names, addresses, e-mail addresses, photographs and voice recordings. It will also include expressions of opinion and indications of intentions about Data Subjects (and their own expressions of opinion/intentions). It will also cover information which on its own does not identify someone but which would identify them if put together with other information which we have or are likely to have in the future
Processing	means virtually anything anyone can do with Personal Data, including: <ul style="list-style-type: none"><li>• obtaining, recording, retrieving, consulting or holding it</li><li>• organising, adapting or altering it</li><li>• disclosing, disseminating or otherwise making it available</li></ul>
Processor	means any person who Processes the Personal Data on behalf of the controller
Special Categories of Data	means any information relating to: <ul style="list-style-type: none"><li>• racial or ethnic origin</li><li>• political opinions</li><li>• religious beliefs or beliefs of a similar nature</li><li>• trade union membership</li><li>• physical or mental health or condition</li><li>• sexual life</li><li>• genetic data or biometric data for the purpose of uniquely identifying you</li></ul>

### WHAT INFORMATION DO WE COLLECT?

We Process Personal Data for each service/process as explained below.

#### Personal Data provided by you

	Personal Data
General enquiries to MBNL:	<ul style="list-style-type: none"><li>• Name</li><li>• Contact details (address, phone number, email address)</li><li>• Details of the enquiry</li></ul>
Landlords and Suppliers:	<ul style="list-style-type: none"><li>• Name</li></ul>

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	<ul style="list-style-type: none"><li>• Contact details (address, phone number, email address)</li><li>• Leasehold property address (if you are a Landlord or potential Landlord)</li><li>• Account details for payment purposes</li></ul>
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We do not actively request for Special Categories of Data or Criminal Offence Data. However, we may come across them if you provide such data to us.

EE Limited and Hutchison 3G UK Limited, with whom Landlords have a lease agreement, sometimes provide Personal Data to MBNL, because MBNL manages Landlords on their behalf.

#### Personal Data about other individuals

If you provide us with information about other individuals, you confirm that you have informed the relevant individuals accordingly.

#### WHY DO WE PROCESS YOUR PERSONAL DATA?

We use your Personal Data to:

- interact with you;
- assist and respond to enquiries about MBNL and our business;
- install and manage network equipment at Landlords' or site-providers' sites;
- manage the contracts or business relationships we have with you; and
- approach you as a potential Landlord.

We are allowed to do Process Personal Data on certain legal bases (please see section 'How is processing your data lawful' for further detail).

#### HOW IS PROCESSING YOUR PERSONAL DATA LAWFUL?

We are allowed to Process your Personal Data and Special Categories of Data on the following legal bases:

	Legal basis
General enquiries to MBNL and interaction with MBNL	<b>Legitimate Interest:</b> We are permitted to process your Personal Data if it is based on our 'legitimate interests' i.e. we have good, sensible, practical reasons for Processing your Personal Data which is in the interest of MBNL. To do so, we have considered the impact on your interests and rights, and have placed appropriate safeguards to ensure that the intrusion on your privacy is reduced as much as possible. In this case, MBNL's legitimate interest is to respond to enquiries made to MBNL, which may relate to its business activities. We only use data that you provide and only use your data in order to respond to your query. In addition, we may use your data to approach you as a potential Landlord to MBNL.  You can object to any of the Processing that we carry out on the grounds of legitimate interests. See the section headed "Your Rights" to find out how.
Landlords and Suppliers	<b>Contract:</b> As agents of EE Limited and Hutchison 3G UK Limited, processing Landlords' Personal Data is necessary for the performance of our services, to which the Landlords have agreed

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#### WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA?

The table below lists some of our key service providers that act as our Processors who will have access to your Personal Data. We also use suppliers who need to access a Landlord's site in connection with services they provide to us (for example sitefield maintenance providers can access name and contact information in order to arrange access to a Landlord's site). If you would like a list of the key suppliers, please contact us (see section "How to Contact Us").

Processors	Personal Data
GVA Grimley Limited	Landlord name and contact details (address, phone number, email address), bank account details
Crown (hosts site data on Orange leases)	Landlord name and contact details (address, phone number, email address).
Ericsson Limited – Storage solution provider	Landlord name, contact details (address, phone number, email address) and bank account details

#### Transfers of your Personal Data outside the EEA

As part of the IT support we receive from Ericsson India Global Services PVT Limited, we transfer your personal data to a country located outside the European Economic Area. Such transfer of your data will be carried out in accordance with the Data Protection Laws to safeguard your privacy rights and give you remedies in the unlikely event of a security breach or to any other similar approved mechanisms. If you want to know more about how personal data is transferred, please contact us using the details in the section headed "How to Contact Us".

#### How we keep your personal data secure

We strive to implement appropriate technical and organisational measures in order to protect your Personal Data against accidental or unlawful destruction, accidental loss or alteration, unauthorised disclosure or access and any other unlawful forms of processing. We aim to ensure that the level of security and the measures adopted to protect your Personal Data are appropriate for the risks presented by the nature and use of your Personal Data. We follow recognised industry practices for protecting our IT environment and physical facilities (for example, ISO 27001).

If you have any particular concerns about your information, please contact us (see "How to contact us" above).

MBNL Landlord Privacy Notice Version 1.1

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#### WHEN WILL WE DELETE YOUR DATA?

We will retain your Personal Data for the period provided below:

Personal Data	Retention period
Details of enquiries and our response	For potential Landlords who contact us asking if we wish to put a site on their property a period of 2 years from the date of the enquiry to MBNL.  For general enquiries 6 months after the enquiry has been satisfactorily resolved
Landlords	During the lease and for 6 years after the lease expires
Suppliers	During the contract and for 6 years after the contract terminates or expires if the contract is with you. During the contract and for as long as you are a contact at the relevant supplier entity.
Potential landlords	For potential landlords who we contact for access to survey a property to see if it is suitable for electronic communications equipment, a period of 2 years from the date of the site access request made by or on behalf of MBNL

#### YOUR RIGHTS

As a Data Subject, you have the following rights under the Data Protection Laws:

Your right	Description
Right to object to processing of your personal data	You may object to us Processing your Personal Data where we rely on a legitimate interest as our legal grounds for processing.  If you object to us processing your Personal Data, we must demonstrate compelling grounds for continuing to do so.  We believe we have demonstrated compelling grounds in the section headed "How is Processing Your Data Lawful".
Right to access Personal Data relating to you	You may ask to see what Personal Data we hold about you and be provided with: <ul style="list-style-type: none"><li>• a copy</li><li>• details of the purpose for which it is being or is to be Processed</li><li>• details of the recipients or classes of recipients to whom it is or may be disclosed, including if they are overseas and what protections are used for those overseas transfers</li><li>• the period for which it is held (or the criteria we use to determine how long it is held)</li><li>• any information available about the source of that Personal Data</li><li>• whether we carry out an automated decision-making, or profiling, and where we do information about the logic involved and the envisaged outcome or consequences of that</li></ul>

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