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MBNL Privacy Notice


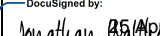
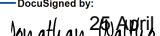
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Version Table:

(Issued Versions Only)

Version No.	Issued Date	Purpose of Issue	Author	QC Check	Approved
1.3	16/04/24	Internal for Info	Eliza Jasinska	Jonathan Waltho	Jonathan Waltho
			 <small>Digitally signed by Eliza Jasinska Date: 2024.04.17 11:41:30 +01'00'</small>	<small>DocuSigned by:</small>  Jonathan Waltho 25 April 2024 <small>88C46487EF134D3...</small>	<small>DocuSigned by:</small>  Jonathan Waltho 25 April 2024 <small>88C46487EF134D3...</small>

Important Confidentiality Notice

The information contained on all sheets of this document constitutes confidential information of MBNL.

The latest version of this document is stored electronically. Any printed or downloaded copy is uncontrolled and may be used for reference or training purposes only.

Version History:

Use the table below to list changes made between **issued** revisions. Any significant changes made to this document must be listed, including changes made specifically in response to review comments. Each listed version/row should detail individual bullet points referring to the section(s) changed and the scope/reason for the change.

Version No.	Date	Name	MBNL Role / Title	Affected Section & Description of Change
1.0	13/02/2018	Eve Hartley	Head of Legal	Created initial version
1.1	21/05/2020	Eliza Jasinska	Corporate Governance	Contact details update
1.2	21/04/2022	Eliza Jasinska	Corporate Governance	Annual Review
1.3	11/01/2024	Eliza Jasinska	Corporate Governance	Annual Review and document transfer to new template in line with DMS requirements. Document Number assigned as 0001-LG-NTI-0002.

Document Owner:

Name	Role / Title
Jonathan Waltho	Head of Legal (Commercial)

Document Distribution:

This document will be distributed to all document reviewers and made available to others on the Quality Management System.

Document Review Plan:

This document will be reviewed and updated as defined below:

- As required to correct or enhance information
- As part of an annual review

Abbreviations and Terminology

Acronym/Term	Definition
Controller	This means the party who (either alone or jointly) determines the purposes for which and the manner in which any personal data is processed .
Criminal Offence Data	This means any information relating to criminal convictions and offences committed or allegedly committed.
Data Protection Laws	This means the laws which govern the handling of personal data . This includes the General Data Protection Regulation (EU) 2016/679 and the Data Protection Act 2018.
Data Subject	This means the person to whom the personal data relates.
ICO	This means the UK Information Commissioner's Office which is responsible for implementing, overseeing and enforcing the Data Protection Laws .
Personal Data	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	covers virtually anything anyone can do with Personal Data, including: <ul style="list-style-type: none"> obtaining, recording, retrieving, consulting or holding it organising, adapting or altering it disclosing, disseminating or otherwise making it available aligning, blocking, erasing or destroying it
Processor	Any person who Processes the Personal Data on behalf of the controller.
Special Categories of Data	This means any information relating to: <ul style="list-style-type: none"> Racial or ethnic origin; Political opinions; Religious beliefs or beliefs of a similar nature; Trade union membership; Physical or mental health or condition; Sexual life; or Genetic data or biometric data for the purpose of uniquely identifying you.

Reference Documents (Including Legislation and Regulations):

Ref:	Document Number	Document Title
[Ref.1]	0001-LG-POL-0004	MBNL General Data Protection Policy

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1. Purpose

This notice sets out how MBNL handle landlord personal data in accordance with MBNL General Data Protection Policy.

2. Scope and Assumptions

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")

MBNL 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.

3. 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:

- **Data Protection Officer:** Jonathan Waltho
- **Address:** 6th floor, Thames Tower, Station Road, Reading RG1 1LX
- **Telephone number:** 07498174971
- **Email:** Jonathan.Waltho@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.

4. What Information Do We Collect?

4.1. Personal data provided by you

	Personal Data
General enquiries to MBNL:	<ul style="list-style-type: none"> • Name • Contact details (address, phone number, email address) • Details of the enquiry
Landlords and Suppliers:	<ul style="list-style-type: none"> • Name • Contact details (address, phone number, email address) • Leasehold property address (if you are a Landlord or potential Landlord) • Account details for payment purposes

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 sites 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.

5. 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).

6. 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	<p>Legitimate Interest: 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.</p> <p>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.</p>
Landlords and Suppliers	<p>Contract: 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 in the contract they have entered into with EE Limited and Hutchison 3G UK Limited.</p> <p>If you are a Supplier, then we may process personal data as necessary for the performance of the contract between us.</p> <p>If you do not provide your Personal Data to us, we will not be able to carry out our obligations or exercise our rights under the terms of the contract.</p>

7. 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 site/field 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

7.1. 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".

7.2. 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).

8. 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

9. 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	<p>You may object to us Processing your Personal Data where we rely on a legitimate interest as our legal grounds for processing.</p> <p>If you object to us processing your Personal Data, we must demonstrate compelling grounds for continuing to do so.</p> <p>We believe we have demonstrated compelling grounds in the section headed "How Is Processing Your Data Lawful".</p>
Right to access Personal Data relating to you	<p>You may ask to see what Personal Data we hold about you and be provided with:</p> <ul style="list-style-type: none"> • a copy • details of the purpose for which it is being or is to be Processed • 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 • the period for which it is held (or the criteria we use to determine how long it is held) • any information available about the source of that Personal Data • 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 decision or profiling <p>To help us find the information easily, please provide us as much information as possible about the type of information you would like to see.</p>
Right to correct any mistakes in your Personal Data	<p>You can require us to correct any mistakes in your Personal Data which we hold free of charge.</p> <p>If you would like to do this, please let us know the Personal Data that is incorrect and what it should be replaced with.</p>
Rights in relation to automated decision making	<p>We do not make any automated decisions about you, so this right does not apply.</p>
Right to restrict processing of Personal Data	<p>You may request that we stop Processing your Personal Data temporarily if:</p> <ul style="list-style-type: none"> • you do not think that your Personal Data is accurate. We will start Processing again once we have checked whether or not it is accurate • the Processing is unlawful, but you do not want us to erase your Personal Data • we no longer need the Personal Data for our Processing, but you need the Personal Data to establish, exercise or defend legal claims • you have objected to Processing because you believe that your interests should override our legitimate interests
Right to have your Personal Data ported (data portability)	<p>You may ask for an electronic copy of your Personal Data which we hold electronically and which you have provided to us when we entered into a contract with you.</p> <p>You can also ask us to provide this directly to another party.</p>
Right to erasure	<p>You can ask us to erase your Personal Data where:</p> <ul style="list-style-type: none"> • you do not believe that we need your Personal Data in order to Process it for the purposes set out in this Privacy Notice • if you had given us consent to Process your Personal Data, you withdraw

Your right	Description
	<p>that consent and we cannot otherwise legally process your Process Data</p> <ul style="list-style-type: none"> • you object to our Processing and we do not have any legitimate interests that mean we can continue to Process your Personal Data • your Personal Data has been processed unlawfully or has not been erased when it should have been

If you have any comments, concerns or complaints about the use of your Personal Data by us, please contact us (please refer to section "How to contact us").

We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex, in which case we will respond within 3 months.

Please be aware that there are exceptions and exemptions that apply to some of the rights which we will apply in accordance with the Data Protection Laws.

9.1. What will happen if your rights are breached?

You may be entitled to compensation for damage caused by contravention of the Data Protection Laws.

9.2. Complaints to the regulator

It is important that you ensure you have read this Privacy Notice - and if you do not think that we have Processed your Personal Data in accordance with this Privacy Notice - you should let us know as soon as possible.

Similarly, you may complain to the ICO. Information about how to do this is available on the website at www.ico.org.uk.

10. Risk Management

n/a

11. Data Management

n/a