

Privacy Policy

At MM Wireless Limited, we are committed to protecting your privacy and ensuring the security of the personal data we process. All personal data collected by MMWL in connection with our services is processed in accordance with applicable data protection and privacy laws, including the UK General Data Protection Regulation (“UK GDPR”), the Data Protection Act 2018, and the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as amended) (“PECR”). Where applicable, MMWL also complies with the EU General Data Protection Regulation (EU) 2016/679 (“EU GDPR”) in relation to personal data processed in the European Economic Area (“EEA”).

This Privacy Policy explains how we collect, use, disclose, and protect your personal data when you use our services, including any data you may provide us when you purchase and use our mobile communication services, and to inform you about your privacy rights and how the law protects you. Your data controller will be MM Wireless Limited, a company registered in England and Wales, having its registered office at Satila House 109-111 Farringdon Road, London, EC1R 3BW (“Data Controller” or “MMWL”). Monzo Bank Limited (registered office: Broadwalk House, 5 Appold St, London, EC2A 2AG, company number: 9446231), markets and sells the mobile communication services provided by MMWL. To get your mobile service up and running, Monzo will also need to process your personal data. You can read more about how Monzo handles your data in their [Privacy Notice](#)

1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy policy

This privacy policy aims to provide you with information on how MMWL collects and processes your personal data and applies to the services we provide to you, namely our data and connectivity services and associated products, including our apps and our websites. This policy addresses personal data we receive directly from you as a data subject.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when collecting or processing your personal data. This ensures you are fully aware of how and why we use your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Contact details

If you have any questions about this privacy policy or our privacy practices, please reach out via the following e-mail address: complaints@mmwl.co.uk or through mail at:

Data Protection Officer

Postal address: Rua de Entrecampos 28, Bloco B

1700-158 Lisbon, Portugal

Changes to the privacy policy and your duty to inform us of changes.

We regularly review and update our privacy policy. Any modifications will be posted on our websites as will be reflected in the “Last update” heading, and where applicable (for material changes), communicated to you. It is essential to ensure that the personal data we hold about you is accurate and up to date. Please inform us if your personal data changes during your relationship with us.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When leaving our website, we recommend reviewing the privacy policy of every website you visit.

2. THE DATA WE PROCESS ABOUT YOU

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

- **Technical Data** This category encompasses a range of information including EID, Type Allocation Code (TAC), ICCID, IMSI, MSISDN.
- **Usage and Connection Data** means information relating to your use of our services and network, including call dates, times and durations, SMS metadata (such as sender, recipient, date and time), data session information, network usage, routing information, IP addresses, and technical logs necessary to provide, maintain, secure, and optimize our telecommunications services. Where strictly necessary and legally permitted, we may process limited internet traffic metadata for purposes such as network management, fraud prevention, security, service optimisation, and compliance with applicable legal and regulatory obligations. MMWL does not monitor the content of your communications.

- **Identity Data** This category may include name, surname, username, billing address, email address, or similar identifier, tax ID, and identity document's number if required for regulatory purposes.

- **Payment Data** information necessary to process the payment, including details of services you have purchased from us, amount/unit price paid, method of payment used during the purchase, payer ID and e-mail address, wallet type (e.g apple_pay, google_pay), customer ID. We do not store credit card numbers as payments are processed securely through third-party PCI payment providers.

We also collect and use aggregated data, such as statistical or demographic data. Aggregated data could be derived from your personal data but will not directly or indirectly reveal your identity. For example, we may aggregate your Usage and Connection Data to calculate the percentage of users accessing a specific website feature.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We employ different methods to collect data from and about you, including through:

- **Direct interactions.** You may give us your personal data through direct interactions, such as filling in forms, corresponding with us via post, phone, email, our Apps, websites, or other means. This includes information you provide when you:

- Purchase or use our services;
- Create an account on our website or application;
- Request marketing to be sent to you;
- Give us feedback or contact us.
- Send a request to our customer service.

- **Automated technologies or interactions.** As you interact with our website and use our services, we may automatically collect certain technical information relating to your device, browsing actions, and usage patterns through cookies and similar technologies. Further information about our use of cookies and similar technologies, including how you can manage your preferences, is available in our Cookies Policy.

4. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA AND LAWFUL BASIS

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data based on more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
To allow you to use our services, website and install and use the application, including establishing a technical connection between your devices and our server infrastructure.	Technical Data. Usage and Connection Data.	Necessary for the performance of a contract with you or to take steps at your request prior to entering into a contract.
To process and deliver your purchase order including manage payments, fees and charges,	Identity data. Payment data. Usage and Connection Data.	Performance of a contract with you or in order to take steps at your request prior to entering into a contract.
To manage our relationship with you which will include: Notifying you about changes to our terms or privacy policy Customer support Collect and recover money owed to us	Identity data. Technical Data. Usage and Connection Data. Payment Data.	Necessary to comply with a legal obligation. Necessary for our legitimate interests. Performance of a contract.
To administer and protect our business, the website and applications (including troubleshooting, data analysis,	Technical Data.	Necessary for our legitimate interests in maintaining the security and integrity of our network and IT systems, preventing fraud, and ensuring the continuity and

Purpose/Activity	Type of data	Lawful basis for processing
testing, system maintenance, support, reporting and hosting of data, service improvement).	Usage and Connection Data.	proper functioning of our business operations. We have assessed that these interests are not overridden by your rights and freedoms.
Based on an official request, if we are legally required to transmit data about your use of telecommunications services, such as telephony and the internet, to the competent authority.	Technical Data. Usage and Connection Data. Identity Data.	Necessary to comply with a legal obligation
Regulatory Compliance. Under certain circumstances for regulatory purposes in some countries in order to provide the services we may require copies of personal documentation (Passport, ID document, etc) from you which will be held by us and made available to national regulators or authorities if they so request.	Identity data.	Necessary to comply with a legal obligation.
To use data analytics to improve our website and APP, services, marketing, customer relationships and experiences. To define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy.	Usage and Connection Data.	Consent when using tracking cookies to monitor user activity. Under certain circumstances, including the analysis of aggregated and anonymized customer behaviour to improve network performance or assessing user navigation patterns within the app for UI optimization, we may rely on our legitimate interest as a legal basis for

Purpose/Activity	Type of data	Lawful basis for processing
		processing. Where we rely on legitimate interests as a lawful basis for processing, we carry out an assessment to ensure that our legitimate interests are not overridden by your rights and freedoms.
To make suggestions and recommendations to you about goods or services that may be of interest to you. To develop our services and grow our business.	Identity Data. Technical Data. Usage and Connection data.	Consent Necessary for our legitimate interests in developing and promoting our services to existing customers who have previously purchased or enquired about similar services from us (soft opt-in). You may object to this processing at any time by contacting us at complaints@mmwl.co.uk or by following the unsubscribe link in any marketing communication.

Where we send you marketing communications by electronic means (including email or SMS), we do so either on the basis of your prior consent or, where you are an existing customer who has previously purchased a similar service from us, on the basis of the soft opt-in under Regulation 22 of the Privacy and Electronic Communications Regulations 2003 (PECR). In either case, you may withdraw consent or object to further marketing at any time by clicking the unsubscribe link in any marketing message or by contacting us at complaints@mmwl.co.uk

5. AUTOMATED INDIVIDUAL DECISION-MAKING

MMWL does not currently carry out any processing that involves decisions made solely by automated means (including profiling) that have legal or similarly significant effects on individuals, within the meaning of applicable data protection laws.

If such processing is introduced in the future, individuals may have the right to request human intervention, express their point of view, and contest the decision, based on their jurisdiction and the nature of the processing.

6. DISCLOSURE OF YOUR PERSONAL DATA

MMWL group of companies: We share your information among the MMWL group as needed for: data processing and storage; providing you with access to our services; providing customer support; making decisions about service improvements and for other purposes described in this Privacy Policy.

Third Party Service Providers: We may use third party service providers to perform services on our behalf or to assist us with the provision of services to you. Therefore, we may engage third party service providers to provide marketing, advertising, communications, payment, security, infrastructure and IT services, to customize, personalize and optimize our Service, to provide bank account or balance information, to process credit card transactions or other payment methods, to provide customer service, to analyse and enhance data (including data about users' interactions with our service), and to process and administer consumer surveys. In the course of providing such services, these third-party service providers may have access to your personal data or other information. We do not authorize them to use or disclose your personal information except in connection with providing their services to us. Third party service providers have a data processing agreement enforced by MMWL, thus cascading to them the security and privacy requirements we uphold with you.

Business transfers: In connection with any reorganization, restructuring, merger or sale, or other transfer of assets, we will transfer information, including personal information, provided that the receiving party agrees to respect your personal information in a manner that is consistent with our Privacy Policy.

Official and regulatory authorities: Under certain circumstances for regulatory purposes, we may be required to share personal data with regulatory authorities.

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.

7. INTERNATIONAL TRANSFER

Whenever we transfer your personal data outside the United Kingdom, we rely on the UK Addendum to the EU Standard Contractual Clauses ("SCCs") as the lawful transfer mechanism, as approved by the Information Commissioner's Office under Article 46 of the UK GDPR. The SCCs contractually require the recipient to protect your personal data to the same standard as required under UK law.

Transfers currently take place to the following countries or regions: United States, Philippines. In each case, Standard Contractual Clauses are in place with the relevant recipient.

8. DATA SECURITY

MMWL implements appropriate organizational and technical measures to protect personal data and traffic data that it processes. It retains personal and traffic data only for as long as necessary to provide its services or as required by applicable laws. Only authorized employees of MMWL, with a legitimate need to fulfil their duties, may process personal and traffic data.

MMWL maintains robust information security policies and processes.

MMWL implements technical measures to ensure the confidentiality of communications content across its services and complies with all applicable legal obligations and exceptions under relevant legislation.

9. DATA RETENTION

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected and to comply with applicable legal, regulatory, tax, accounting, or reporting obligations. When personal data is no longer required, it is securely deleted or anonymised.

The criteria we use to determine retention periods include: the duration of our contractual relationship with you and any subsequent period needed to resolve disputes or enforce agreements; the type and sensitivity of the data and the potential risk of harm from unauthorised use or disclosure; our legal and regulatory obligations as a UK telecommunications provider, including obligations under the Investigatory Powers Act 2016, the Communications Act 2003, and applicable financial and tax legislation; applicable limitation periods under the Limitation Act 1980; and guidance issued by the ICO or other competent regulators.

As a guide, we apply the following retention periods to the main categories of personal data we hold:

Data category	Retention period	Basis
Customer account and identity data	Duration of contract + 7 years	Limitation Act 1980 (contractual claims); tax and accounting obligations

Data category	Retention period	Basis
Billing and payment records	Duration of contract + 7 years	HMRC record-keeping requirements; VAT Act 1994
Traffic and usage data (call records, data sessions)	12 months from date of communication	Statutory obligations; network management; fraud prevention.
Marketing consent records	Duration of consent + 3 years after withdrawal or last contact	ICO guidance on demonstrating PECR consent
Customer service and complaint records	2 years from complaint receipt	Ofcom complaint handling obligations; limitation periods

10. YOUR LEGAL RIGHTS

Under applicable data protection laws, you may have the following rights in relation to your personal data, subject to certain legal limitations and exemptions:

- Right of access – to request access to your personal data;
- Right to rectification – to request correction of inaccurate or incomplete personal data;
- Right to erasure – to request deletion of your personal data;
- Right to restriction of processing – to request restriction of processing in certain circumstances;
- Right to data portability – to receive your personal data in a structured, commonly used and machine-readable format;
- Right to object – to object to processing based on legitimate interests or direct marketing;
- Right to withdraw consent – where processing is based on consent, to withdraw that consent at any time; and
- Rights related to automated decision-making – to request human intervention or contest certain automated decisions where applicable.

These rights are not absolute and may be subject to applicable laws and exemptions.

If we have collected and processed your personal information based on your consent, then you can withdraw your consent at any time; withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect

processing of your personal information conducted in reliance on lawful processing grounds other than consent. If you want to contact us about any of your rights or complain about how we use your information, please contact us at complaints@mmwl.co.uk

Where we are required by law or under the terms of a contract with you to collect personal data, and you fail to provide such data when requested, we may be unable to provide some or all of our services to you.

Our services are not directed to children and are not intended for individuals under the age of 18. We do not knowingly collect personal data from children.

You have the right to file a complaint at any time with the Information Commissioner's Office (ICO). Further information is available at www.ico.org.uk. We would, however, appreciate the chance to deal with your concerns before you approach the data protection authority, so please contact us in the first instance.

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 informed of the progress, including providing an estimated timeframe for our response, in accordance with Article 12(3) of the UK GDPR.