



UNDO srl  
Chaussée de La Hulpe 177, Box 11  
B-1170 Brussels

Customer Service Phone: 1989 or +32490461999  
[support@undo.be](mailto:support@undo.be)  
[www.undo.be](http://www.undo.be)

Date : 01/04/2023

## Privacy Policy

### 1. General

*This document (hereinafter referred to as "Privacy Policy") has been prepared by UNDO srl, with registered office at Chaussée de La Hulpe 177, Box 11, B-1170 Brussels, and company number 0788.352.652 (hereinafter referred to as "UNDO" or "we").*

*The Privacy Policy aims to provide you with transparent information about the manner in which your personal data are collected and the purposes for which they are processed.*

*In the course of providing its services, UNDO processes various types of personal data about you for different purposes. UNDO is the controller of your personal data and determines the purpose and means of processing your personal data.*

*UNDO is firmly committed to processing this data in a manner that respects the privacy of its customers and the following principles:*

- Security: our customers' personal data is securely stored and reliably processed.*
- Control: the customer will be able to control how this personal data is used and consent to such processing.*
- Transparency: data processing is carried out in full transparency at every stage of our relationship with the customer.*
- Support: UNDO helps its customers to better protect their privacy and personal data.*

*We therefore advise you to read this Privacy Policy carefully. If you have any questions, you can find our contact details at the end of this Privacy Policy.*

### 2. What personal data do we collect ?



By "personal data" we mean any information relating to a natural person. The type of personal data collected depends on the service and the purpose of the processing.

To allow you to use our products and services, we need your personal data. We also collect other personal data, such as data on payments and communication traffic. All these data are stored in our files for a specific length of time.

## 2.1. Information you provide to us

If you want to use our services and products, we need some personal data. For example, this may include your surname, first name, address, login, e-mail address, telephone number, mobile phone number, date of birth, language, details of your identity document or your customer number. Sometimes we also need other information, such as specific preferences and requirements related to the service in question.

Personal data can be collected in many ways such as by telephone via customer service, in writing via order forms, e-mail or text message, digitally via e-forms or when you chat with our chatbot or via our website, via the UNDO website or applications or when you use social media to contact us.

Each customer contact offers the possibility to collect personal data: e.g. when you order; participate in a survey, test our competition; call our customer service; identify yourself on the website or the applications; register for a newsletter; or simply ask us for information.

During the registration process, it is indicated whether the requested information is mandatory or not. If this is the case, you will not be able to complete the registration process if you do not provide the requested information, as we will then not be able to provide our services to you.

You can always refuse to provide certain data, but this may mean you won't be able to use certain products or services, or that they won't function as they should.

## 2.2. Information we obtain through your use of our products/services

We collect data on the way you use our products and services and websites; data on the devices you use (type/brand) and on the communication traffic that flows over the network.

This communication traffic information contains called numbers, mobile device identification, data and duration of the communication or date, duration and data volume of an internet session and visited sites, and the kind of mobile apps you use.

We also collect your billing and payment data.



### 2.3. Information we purchase from third parties

We may use socio-demographic data and consumer information coming from different commercial brokers.

### 2.4. Identification of customers

UNDO needs your identity information to correctly identify you when you purchase a service or request a change to an existing service or contract or access to certain customer data.

You can identify yourself by using the Itsme app or, if available, via an electronic reading of your eID card. If you use the Itsme app, UNDO will receive the necessary identification data from Itsme in a secure manner.

If you identify yourself with a Belgian identity document, UNDO collects the following data: your surname, first name, date of birth, gender, address, document number and period of validity and your national registration number (the latter only for the judicial and other competent authorities).

UNDO needs your identity data for the following purposes:

- to be able to offer you the requested services. UNDO must be able to correctly identify its customers in order to enter into a contractual relationship, to be able to provide the services to the customers, to bill the customers and to contact the customers for all customer administration. This data processing is necessary for the execution of the agreement between UNDO and the customer;
- to combat fraud, phishing and identity theft. On the one hand, UNDO wants to prevent the use of false identities or the ordering of services that will never be paid for, on the other hand, UNDO also wants to protect you against misuse of your identity and prevent you from becoming a victim if someone with bad intentions tries to order products or services in your name. The legal basis here is the legitimate interest of both UNDO and the customer in preventing fraud and identity theft;
- to comply with the legal obligation to identify customers before the judicial and other competent authorities. UNDO, like all other providers of electronic communication services, is legally obliged to identify its customers. This is set out in the Electronic Communications Act of 13 June 2005 and in the Royal Decrees of 19 September 2013 and 27 November 2016.
- to have a high-quality database to keep customers informed about UNDO's products and services via various communication channels such as e-mail, SMS, telephone, letter and online advertising. UNDO will try to adapt its communication



as much as possible to your personal needs, for example on the basis of your age, your gender and your place of residence. The number of your identity document will help us to identify you uniquely in the customer database and to avoid the creation of duplicate accounts for one and the same customer. You are, of course, entitled to refuse the use of your data by UNDO to send you commercial information. This data processing is based on UNDO's legitimate interest in promoting its services to its customers.

UNDO can check the validity of your identity document by means of automated and/or manual verifications. If, on the basis of these verifications, it appears that the identity document has expired, been stolen, falsified or is invalid for any other reason, UNDO will refuse the document and the service requested by the customer cannot be provided. The customer will be informed accordingly. If UNDO's decision is based on a purely automatic decision without human intervention, the customer will be informed at that time of the steps he can take to contest the automated decision.

### **3. For what purposes do we use this data?**

*We process personal data for various purposes. These can be of a technical, administrative, commercial or legal nature.*

We use your personal data for different reasons, including for:

- delivering the requested products/services or information;
- connecting with electronic communication networks of other operators;
- resolution of technical problems and malfunctions in our services;
- billing and accounting;
- customer administration and support;
- correct use of roaming abroad;
- dispute management;
- detecting fraud and infringements against UNDO, its employees, its customers or its suppliers;
- automatic testing of your data against the existing databases of UNDO and third parties before concluding a contract, in order to prevent fraud, insolvency or the risk of unpaid bills (i.e. a creditworthiness test) ;
- improving the quality of our products and services;
- internal reporting purposes;
- planning and organization of telecom infrastructure and development of new products and services;
- market research and testing of products and services;
- customer profiling based on all the collected data to make the information about our products, services and offers more relevant to you;



- better alignment of your potential interests and needs with advertising in the online advertising network of UNDO and third parties (such as Google);
- fulfilling our legal obligations vis-à-vis the courts and other Belgian authorities such as the tax authorities, the emergency services, and the judicial authorities, or for warning you, at the government's request and on the basis of your location data on our mobile network, about an imminent threat or major disaster.
- fulfilling our legal obligation to make subscription data available to the people who draw up and distribute the telephone directory or offer a directory assistance service.

UNDO processes your data only if there is a legal basis for doing so, as laid down in the privacy regulations, or if:

- we need your personal data to prepare and perform our contract with you and deliver the service to you;
- we ask for your permission to process your data;
- we are required by law to process your data;
- UNDO processes your personal data for its own legitimate interest or that of a third party, where this is in balance with your right to privacy.

UNDO has a legitimate (commercial) interest in processing and using your data:

- to promote and better align its offer and services with your potential interests, whether you are an UNDO customer or not. You can always object to this use of your data or indicate your preferences;
- to share some of your personal data with subsidiaries of the UNDO Group;
- in the context of fraud management;
- for network and information security;
- to solve technical problems and malfunctions you experience; to this end, UNDO may use data on your use of our services, such as your communications traffic;
- to test and develop new products and services;
- to draw up anonymous, aggregated reports for internal and external use;
- to provide verification services to third parties;
- for third-party billing (roaming, interconnection, etc.);
- for organization and management of the work schedule (e.g. with regard to technicians);
- in the context of market research;
- in the context of corporate administration (public relations).

UNDO uses the consumption data of its customers to create a user profile and divide them into market segments. Based on these profiles, UNDO will offer customers personalized gifts, promotional offers or a better price plan. It is always up to the customer to accept this gift, this price plan or to choose another price formula. The final decision is always in the



hands of the customer and UNDO does not make (automated) decisions for the customer. The customer may choose to withdraw consent to such processing.

UNDO has a legal obligation to indicate the best tariff plan on the customer's bill at regular intervals.

UNDO is also responsible for giving the customer the possibility, upon request, to share his data and consumption profile with the telecom regulator's tariff simulator.

#### **4. What is secrecy of telecommunications?**

*UNDO and its employees may not have knowledge of your communication traffic over our different networks. The only exception are phone calls to our customer service.*

UNDO personal and partners have no access to the content of the customer communication on the UNDO network as call content, email or sms messages, internet session content etc. This information is protected by the telecommunication secrecy. UNDO has taken the necessary security measures and given strict instructions to its employees to respect the secrecy of telecommunications. This information is encrypted while transiting the UNDO network the time needed for the processing of the communication.

Calls to the UNDO customer service can be recorded to monitor the quality of the UNDO customer service and can be used as evidence in the event of a commercial dispute.

In case of technical problems or to check the quality of its services, UNDO may need to look at the content of your traffic/communication to analyse what went wrong and solve the problem. Such interventions are limited to what is strictly necessary for detecting, analysing and solving the problem.

#### **5. With whom do we share your data?**

*We may share your personal data with our subsidiaries and third parties with whom we collaborate. If you pay for services from third parties via our bill, we can pass on your mobile number to said third parties. We may also have to provide your personal data to the Ombudsman's office if you submit a complaint there. And in some cases, UNDO has a legal obligation to provide data to government services.*

##### **5.1. With the authorities**

We may also share or transmit personal data, including the content of your communications:



- To comply with the law or in the context of legal proceedings or requests (emergency services; judicial inquiry; request of the Belgian intelligence services, the Belgian Institute for Postal Services and Telecommunications, and the tax authorities)
- To detect, avoid or otherwise address fraud and technical security problems;
- To protect the rights and property of UNDO, including maintaining our terms and conditions of use.

## 5.2. With suppliers, subcontractors and other service providers

We use other companies, intermediaries, contractors or service providers to perform certain services on our behalf or to assist us in providing services to you. For example, we use suppliers to provide network access, marketing, communication, infrastructure and IT services, to optimize our service delivery, to process credit card transactions and limit fraud in connection with credit card transactions or other payment methods, to provide customer service, to collect debts, to analyse data, and to process and manage user feedback. In the course of providing these services, these suppliers may have access to your personal data or other information.

UNDO is a 'mobile virtual network operator' ('MVNO') which uses the network of a 'mobile network operator' ('MNO') in order to provide mobile services to its customers. As a result, the MNO that runs the network that UNDO uses also has access to certain data. For example, the MNO has access to so-called location data that enables it to locate your SIM card. This location data indicates which base station or Wi-Fi point your mobile device is connected to. This data can be used for network planning and management by the MNO, but also in the context of certain legal obligations, for example for the transmission of your location during emergency calls or at the request of public services in the context of a legal investigation.

We only allow these companies to process your personal data for the strict purpose of providing their services or complying with certain laws and we require them to take the necessary measures to respect the confidentiality of your personal data, with an appropriate level of security.

UNDO can enlist the services of subcontractors located outside the European Economic Area. UNDO only works with subcontractors from countries that the European Commission deems can guarantee a suitable level of protection, or with subcontractors bound by the standard provisions approved by the European Commission.

In addition, your personal data may be shared outside the European Economic Area if this is required for the delivery of the service you wish to use, e.g. when you call a number in a



country outside the European Economic Area or visit a website hosted by servers outside this area.

### **5.3. With the Office of the Ombudsman for Telecommunications**

If you submit a complaint to the Office of the Ombudsman for Telecommunications, we may have to disclose your data to the Ombudsman for the handling of your complaint.

### **5.4. With directory services companies**

If the customer has agreed to publication of his phone number(s) in the telephone directories some of his personal information will be shared with the provider of these directories. The customer can revoke this publication via his customer zone or by calling customer relation. It can take some time before this request becomes effective.

## **6. How is my personal data protected?**

*The protection and security of your data is important to us. We use a variety of security technologies and procedures to appropriately protect your data from unauthorised access, use or disclosure.*

UNDO has implemented security measures appropriate to the degree of sensitivity of the personal data to protect against malicious intrusion, loss, alteration or disclosure to non-authorized third parties.

UNDO issues permissions for access to its information systems to only those who need access to perform their function

UNDO educates its employees to the protection of personal data made available to them in the framework of their duties and shall ensure that they comply with the rules in force and the ethics of the company.

UNDO performs controls and audits to verify the correct operational application of these rules.

UNDO requires its suppliers to comply with its principles of security.

If a breach of privacy or personal data is detected, we will inform the competent authority and the persons concerned as soon as possible.

## **7. How long do we keep your personal data?**





UNDO does not store customer data for longer than is necessary for the purposes for which it was collected. The retention of data depends on the type of data collected and the purpose of the processing. Some data must also be kept for a certain period of time in accordance with certain legislation. Retention periods may therefore vary.

- The customer's identification data (name, address, etc.) are kept for up to 10 years after the termination of the contract. This data is only used to identify the person as a former customer if necessary.
- Traffic data and technical data are kept for 1 year.
- For tax purposes, customer billing and financial information is kept for 8 years.
- Telephone conversations with customer service are kept for 3 months.

You can ask us for further details about the retention periods for different aspects of your personal data.

## **8. Does UNDO collect personal data from people who are not yet customers?**

UNDO can collect your data if you are not yet a UNDO customer through various channels. These data can be used to inform you about UNDO products, services and promotions. You have the right to object to such use of your data.

UNDO can collect your data if you are not yet a UNDO customer. It can do this through various channels, such as:

- when you participate in a UNDO competition;
- promotional offers at events;
- door-to-door campaigns;
- use of the UNDO websites and social medias;

UNDO mainly collects the following data:

- your first and last name;
- your e-mail address;
- your mobile number;
- your postal code;
- other data, such as data about the competition or event in which you took part.

UNDO uses these data to inform you about its products, services and promotions. If you no longer wish to be kept informed, you can opt-out by contacting us.

## **9. What are your rights?**



*You have the right to inspect, correct and remove your personal data. You can also object to the use or processing thereof. You can withdraw your consent and change your choice. Finally, you can register on the Do Not Call Me list ([www.dncm.be](http://www.dncm.be)). If you are an UNDO customer, in most cases you can indicate your privacy preferences via UNDO website and applications or via our customer service. If you are not a customer, you can always call our customer service.*

You have the following rights with regard to the processing of your personal data:

### **9.1. Right of access**

You have the right to request access to your personal data. We will then provide you with an overview of the personal data we process on you. We will also give you additional information on, for example, why these personal data are processed, the origin of the data, the types of third parties with whom we share your personal data, etc.

You also have the right to obtain a free copy of the data processed, in an intelligible form. UNDO may charge a reasonable fee to cover its administrative costs for each additional copy you request.

### **9.2. Right to rectify**

You have the right to rectify or delete incomplete, incorrect, inappropriate or outdated personal data. We therefore advise you to check regularly whether your personal data is still up to date. As soon as you log in via your account, you can manage certain personal data yourself. If you have any other questions, you can find our contact details in this Privacy Policy. If necessary, we will then modify or delete this information within the legally prescribed time limits.

### **9.3. Right to erasure / right to be forgotten**

You have the right to have your personal data deleted without undue delay in the following cases

- your personal data is no longer necessary for the purposes for which it was collected or otherwise processed by UNDO ;
- you withdraw your previous consent to the processing and there is no other legal basis that UNDO can invoke for (further) processing;
- you object to the processing of your personal data and there is no justified basis for UNDO to continue the processing;



- your personal data is processed unlawfully ;
- your personal data must be deleted to comply with a legal obligation;
- your personal data was collected when you were still a minor.

Please note that UNDO may not always be able to delete all the personal data requested, for example, if UNDO is legally obliged to retain such data (e.g. billing data) or if processing is necessary for the establishment, exercise or defence of legal claims. UNDO will provide you with more information in this regard in its response to your request.

#### **9.4. Right to limit the processing**

You have the right to have the processing of your personal data restricted in the following cases:

- you dispute the accuracy of your personal data: their use is limited for the period that allows UNDO to check their accuracy;
- the processing of your personal data is unlawful: instead of requesting the deletion of your data, you request that their use be restricted;
- UNDO no longer needs your data for the original purposes of processing, but you do need them for the establishment, exercise or defence of legal claims: instead of requesting the deletion of your data, their use is restricted to the establishment, exercise or defence of legal claims;
- As long as no decision has been taken regarding the exercise of your right to object to the processing, you request the restriction of the use of your data.

#### **9.5. Right to portability**

You have the right to request the transfer of your personal data, for example in order to be able to change service providers more easily. This is only possible for personal data that you yourself have provided to UNDO on the basis of an authorisation or a contract. In all other cases, you do not have this right (e.g. when the processing of your data occurs on the basis of a legal obligation).

When exercising this right, you can ask UNDO :

- to retrieve the relevant personal data in a structured, readable and commonly used format;
- to transmit them directly to another controller. In this case, you are responsible for the accuracy and security of the e-mail address you provide for the transmission. UNDO can, however, refuse this right if transmission is not technically possible.

#### **9.6. Right to object to the processing**



You have the right to object to the processing of your personal data, if the processing is done in the legitimate interest of UNDO or in the public interest. UNDO will suspend the processing of your personal data unless it can demonstrate compelling legitimate grounds for the processing that override yours or if the processing of personal data is connected with the establishment, exercise or defence of legal claims. You always have the right to object to processing in the context of direct marketing and profiling by UNDO for direct marketing purposes.

### **9.7. Right to withdraw your consent**

Insofar as the processing of personal data is based on consent, you have the right to withdraw your consent at any time.

### **9.8. Right to complain**

If you wish to lodge a complaint about the processing of your personal data, you can contact us as indicated at the end of this Privacy Policy.

You also have the right to lodge a complaint with the Data Protection Authority. You can contact it at the following address : <https://dataprotectionauthority.be/>

### **9.9. How to exercise your rights?**

To exercise the above rights, you can send us a written request as indicated at the end of this Privacy Policy. In order to exercise your rights and to avoid unlawful disclosure of your personal data, UNDO must verify your identity. In case of doubt or ambiguity, UNDO will first ask you for additional information (usually a copy of the front of your identity card).

### **9.10. Fees**

You may exercise your privacy rights free of charge, unless your request is manifestly unfounded or excessive due to its repetitive nature. In this case, UNDO has the right and the choice - in accordance with the privacy legislation - to

- to charge you a reasonable fee (taking into account the administrative costs of providing the requested information or communication and the costs of taking the requested action);
- to refuse your application.

### **9.11. Time limit**



UNDO will respond to your request as soon as possible, and in any case within one month of receipt of your request (this period begins as soon as your identity has been sufficiently demonstrated to UNDO).

Depending on the complexity and number of applications, this period may be extended by two months. In the event of an extension, UNDO will inform you within one month of receipt of the application.

## **10. What are cookies (and related technologies) and how are they used?**

*Cookies allow us to recognize you as a visitor to our websites, so we can provide you with personalized information.*

You can consult our cookie policy via the hyperlink "Cookie policy" at the bottom of the homepage of our websites.

## **11. Information about specific products and services**

### **11.1. Information we receive via our websites**

*All our websites are freely accessible. However, to access certain parts or functions of our websites, you need an account with a login and password. When you visit a UNDO website, we register your connection data. If you are logged in with your UNDO account, we can recognize you and adapt the content of our website to your profile. Your comments in evaluation tools on our websites can be shown anonymously on other websites, although you have to use a pseudonym when you leave a comment. We can also disclose data to third parties that we hire to track and analyse browsing behavior on our websites.*

You can visit our websites without having to enter any personal data. Sometimes, certain parts or functions of our websites are only accessible after you enter the login and password of your account or subscription.

#### **Connection data**

We register data about your connection to our websites and the software and devices you use to connect. This information can include your IP address, the time, the browser, the type and brand of device you use, and the pages you visit.

These data are used to generate anonymous statistics and improve the overall quality of our websites and service, thanks to the analysis of the browsing behavior of visitors on our websites.

If you log in to our websites using your UNDO account, we can recognize you as a UNDO customer. We can then personalize some of our website content, partly on the basis of other data we have collected about you as a UNDO customer. For example, we can display



information about products or services you do not yet use and which we think might interest you, rather than show you information about products and services you already know.

### **Hyperlinks**

Our websites can contain hyperlinks to websites which are not managed by UNDO. Such hyperlinks are for information purposes only. We therefore advise you to carefully read the privacy policy of such websites.

### **Evaluation of products and services**

Partner technology may be used on our websites to allow you to evaluate our products and services. The personal data collected in this way are used to manage this evaluation service. Your comments may be displayed on other websites besides those of UNDO, without any mention of your personal data. In any event, you have to use a pseudonym when you leave a comment.

### **Analysis of the use of UNDO' websites**

On our websites, we can use the services of third parties to track, analyse and report on browsing behavior (third party analytics). To this end, such third parties can collect anonymous data about your use of our websites, including your behavior on our websites. Such data enable us to track down any errors in our websites and determine how we can improve your user experience.

In only one case, your personal data may be collected using a partner's analysis tool. These personal data are solely used to see how users navigate on our websites and, based on this, to improve the user experience on the websites.

### **Collection of personal data via the UNDO websites**

When you complete an online form (e.g. when you order a product or service), your personal data are collected and processed in accordance with this Privacy Policy.

When you order a product or service on our website but don't complete your order (e.g. due to a technical problem), the personal data you entered before sending the order form can be used to temporarily save your digital shopping basket. We can send you an e-mail with a hyperlink to your shopping basket to make it easier for you to complete your order, if you wish to do so. If you don't reply to this e-mail within a reasonable time frame, your personal data and your shopping basket will be removed.

## **11.2. Personal data in the UNDO app**

*To function as it should, the UNDO app needs to access personal data stored on your mobile device. UNDO uses the personal data on your device only where such data are necessary for the functionality of the app. In addition, UNDO collects data about your use of the UNDO app in order to improve the app and adapt it to user needs. The personal data collected are kept for two years and are not shared with third parties for commercial purposes.*



The UNDO app only uses the following categories of personal data. The purpose for which the data are used is indicated for each category:

- your mobile number and/or your e-mail address: to identify you as a user of the app and to prevent other people from obtaining access to your customer information in the UNDO app;
- your contacts: to allow you to easily perform a service for one of your contacts;
- your phone number: to allow you to call our customer service via the app;
- your Wi-Fi connection: only to check whether your Wi-Fi connection is activated – it is not possible to identify your device via a Wi-Fi connection;
- your data connection: this is required for the functionality of the app;
- your device identification: to send you push notifications related to the app, your bill, your products/services, your loyalty program, or UNDO solutions and promotions that might interest you (in the "notifications" section, you can indicate which sort of messages you want to receive);
- your location data: only to make it easy to provide some services on the basis of your GPS data;
- Your battery/charging consumption: this information is processed via a widget linked to the app in the context of UNDO calculating in real-time your mobile CO2 emissions.

For the functionality of the UNDO app and the analysis of its use, a small amount of data may have to be stored on your device. This concerns so-called functional and analytics cookies. These are small files which are stored on your device and are needed for the functionality of the app. You can't refuse them.

### **11.3. Personal data in the context of repairs and technical assistance**

*For the repair of infrastructure or devices, UNDO can collect personal data that can be useful or necessary for the repair.*

When you bring a device you purchased at UNDO in for repair, your contact details and the data concerning the device (the IMEI number, brand, model, serial number) are stored in UNDO' files for the management of the repair process. If necessary, these data are passed on to UNDO' repair service or to the manufacturer of the device and/or its repair service. The data are kept for two years. For more information about the processing of your data by manufacturers and their contact details, please refer to the privacy policy of the manufacturer of your device, which can be found on its website.

If you do not delete the data stored on your device before bringing it in for repair, the competent repair service can access the data on your device during the repair. These data may have to be deleted during the repair and your device may have to be reset to the



factory settings to enable the repair. If your device cannot be reset, the data will be destroyed.

UNDO processes internal identifiers to help provide assistance in case of technical issues. It is in UNDO's interest that UNDO develops an efficient way to provide technical support. This internal identifier allows UNDO to log your actions and quickly identify the action related to the technical issue in order to provide a rapid and efficient assistance. UNDO will only access your actions if technical assistance is needed.

#### **11.4. UNDO advertising via e-mail and social media**

*We can display/send advertisement on our products and services via e-mail and your social media accounts. If you no longer want this, you need to adapt your account settings.*

UNDO can send you e-mails to keep you informed about existing and new products, services and promotions, unless you objected to this. There is also an opt-out possibility in each commercial e-mail we send. We use tools to measure and track the impact of these e-mails (e.g. was the e-mail opened or not, was a hyperlink clicked?). This way, we make our e-mail campaigns more effective and can better align our offer with your personal interests.

If you have a Facebook, Instagram, Twitter, LinkedIn, TikTok, Snapchat, Google account or other types of social media accounts, UNDO can display advertisement via these accounts on products, services and promotions that might interest you. To this end, UNDO determines a specific target audience by using a number of parameters such as age, gender, interests, ... and asks the provider of a social media channel to show a specific advertisement to this target audience. It is important to note that UNDO does not share personal data with the provider of the social media channel. If you don't want such advertisement, you need to change your settings for advertising in the relevant account or via [www.youronlinechoices.com](http://www.youronlinechoices.com).

#### **11.5. Direct Carrier Billing**

*UNDO offers its customers the possibility to pay for products/services offered by other entities through "direct carrier billing". When you want to buy a digital service for instance, the provider of the service will offer you different means of payment. One of them is called "Direct carrier Billing".*

It means the amount of the product/service will be mentioned in a statement attached to your Mobile Telecom operator's invoice. If you wish to resort to this mean of payment, UNDO and the provider will share personal data about you. The provider will mainly transfer UNDO information about the service purchased. If required, UNDO will use and transfer your phone number to allow your identification by the provider and confirm whether the





transaction can go through or not. For these categories of information, UNDO is acting as a data controller and transferring your data based on its legitimate interest to offer Direct carrier Billing payment services to its partner and provide a safer mean of payment for its customers online. When the transaction is confirmed, the service will be mentioned in a statement attached to your telecom invoice and the amount will be collected by UNDO and transferred to the provider. In this situation, the service provider is controller of the data related to the purchase of the product/service and UNDO is its processor.

## 12. Changes to the Privacy Policy

*Changes can always be made to our privacy policy. Therefore, consult this site regularly.*

We reserve the right to modify or supplement the Privacy Policy, for example in connection with changes to our services. When we publish changes to the Privacy Policy, we will change the update date on the Privacy Policy and notify you in advance (e.g. by sending you an email notification). We will seek your consent where required by law.

## 13. Contact us

If you have any questions about our products or services or the Privacy Policy, you can contact us:

By post: UNDO srl, Chaussée de La Hulpe 177, box 11, 1170 Brussels

By e-mail: [privacy@undo.be](mailto:privacy@undo.be)

Last update : 01/04/2023