

Our Privacy and Cookie Policy

Changes to Our Privacy Policy

This Privacy Policy gets updated from time to time; whenever we make a change, we'll post this on our website and let you know.

We have revised our Privacy Policy as we are introducing some new features and new ways of working. The main changes are listed below.

Section	Changes	Date of Update
Privacy & You	Included new information in the section related to <u>How we use your personal information</u> section titled Marketing & tailoring our service to you , regarding direct marketing to non-Vodafone customers	24/05/2018
Privacy & You	Updated information in the section related to <u>How we share your personal information</u> section titled Third parties that we work with , regarding third party social media & platforms	24/05/2018
Our Products and Services	Vodafone Shake X Factor app privacy supplement has been added	05/11/2018
Our Cookies Policy	Vodafone Future Jobs finder – Use of Cookies section has been added	03/11/2018
Privacy and Our Products and Services	Vodafone Future Jobs finder privacy supplement has been added	03/11/2018
The basics	Increased visibility around collection of your personal information and the different lawful purposes for which we use your personal information;	21/05/2018
Your Rights (previously How can you obtain a copy of your personal information? and Enquiries or Complaints)	More detail of the data protection rights you have over your personal data and how you can exercise them	21/05/2018
Marketing & tailoring our service to you	Transparency on required marketing permissions and how to manage permissions	21/05/2018

Version 6

Last updated: 24th May 2018

How to use this Privacy and Cookie Policy

In this policy, we explain how we collect, use, share and protect your personal information when you use our products, services and our website or app.

Who we are

We are Vodafone Malta Ltd. We are a member of the Vodafone Group for more information go to <http://www.vodafone.com/content/index/about/where.html>. In this privacy policy:

- “we/us/ our” means Vodafone Malta Ltd;
- “third party” means someone who is not you or us; and
- “Vodafone Group” means Vodafone Group Plc and any company or other organisation in which Vodafone Group Plc owns more than 15% of the share capital.

Our registered office is Level 6, SkyParks Business Centre, Luqa, LQA4000. We are registered in Malta under company number C10865.

Our main switchboard is 3569999247 or you can email us at 247.mt@vodafone.com.

How to contact us

Your opinion matters to us – if you have any questions about our privacy policy, you can contact our local Data Protection Officer:

Please write to:

Data Protection Officer
SkyParks Business Centre
Malta International Airport
Luqa
LQA 4000, Malta
Or email us at: privacy.mt@vodafone.com

Our principles

Vodafone is committed to respecting your privacy. We take privacy, security and complying with data protection and privacy laws seriously.

We have set out our core [Privacy Commitments](http://www.vodafone.com/content/index/about/privacy.html) (<http://www.vodafone.com/content/index/about/privacy.html>) in our Privacy Centre. We aim to put these commitments at the heart of everything we do.

Privacy and you

The basics

Personal information we collect about you

The personal information we collect about you and how we collect it can vary depending on the products and services that you use and subscribe to, how you have used the products and services, and how you have interacted with Vodafone even if you aren't a customer, or what we have obtained from a third party with permission to share it with us.

Vodafone will process your personal data based on:

1. **The performance of your contract or to enter into the contract** and to take action on your requests. For example, so you can make calls and texts, and browse the internet on your phone, we process things like the numbers you dial, how much data you're using and when you're doing it so we can provide connectivity. This also enables us to generate your bill, based on your usage. We also need to conduct credit checks in order to provide you with our products or services.
2. **Vodafone's legitimate business interests**, for example, fraud prevention, maintaining the security of our network and services, direct marketing, and improvement of our services. Whenever we rely on this lawful basis to process your data, we assess our business interests to make sure they do not override your rights. Additionally, in some cases you have the right to object to this processing. For more information, visit the Your Rights section of this policy.
3. **Compliance with a mandatory legal obligation**, including for example accounting and tax requirements, which are subject to strict internal policies (such as retention periods), procedures, and your right to restrict usage of your data, which control the scope of legal assistance to be provided; or
4. **Consent you provide** where Vodafone does not rely on another legal basis. Consent may be withdrawn at any time.

To withdraw your consent, you may use one of the following methods:

- By logging into your [My Vodafone](http://www.vodafone.com/mt/mypermissions) (<http://www.vodafone.com/mt/mypermissions>) account from our website and clicking on My Profile .
- Visit any Vodafone store
- Calls us on 247
- If you are a business customer, by calling or sending an email request to your respective Account Manager, who will in turn pass it on to the Enterprise Support Team to process

For more information on how to manage your consents go on Your Privacy Settings section of this policy.

We will collect your information when you, for example:

- Buy or use any of our products and services;
- Use our network or other Vodafone products and services;
- Register for a specific product or service;
- Subscribe to newsletters, alerts or other services from us;
- Contact us through various channels, or ask for information or complain about a product or service;
- Take part in a competition, prize draw, marketing activity or survey;
- Subscribe to a My Vodafone account on our website or My Vodafone app;
- Visit, log in to or browse our website or other Vodafone Group websites;
- Have given permission to other companies, such as our business or joint-venture partners as well as our third-party suppliers or contractors, to share information about you;
- Where your information is publically available; or
- Are the customer of a business that we acquire.

We also collect information from certain organisations, where appropriate and to the extent we have legal grounds to do so. These include fraud-prevention agencies, business directories, credit check reference/vetting agencies, billing calculating agencies and connected network providers.

We use cookies (small text files stored in your browser) and other techniques such as web beacons (small, clear picture files used to follow your movements on our website and My Vodafone app). For more details on this and how to opt out of these, please see Our Cookie Policy section of this policy.

The types of information we may have are, where applicable, such as:

- Your name, address, phone and/or mobile number, your proof of identification, your date of birth, gender and email address;
- Your credit or debit card information, information about your bank account and other banking information – for example, you’ll have to give us this information when you open an account with us. We’ll collect the data necessary to process a payment whenever you make a purchase;
- Your traffic data. This is data we see as part of providing you with connectivity like the numbers you call, the time and duration of the call or the amount of data you are using;
- Your location data. This can be precise where it uses Global Positioning System (GPS) data or by identifying nearby mobile phone masts and you enable location-based services or features. Or less precise where, for example, a location is derived from your data such as country, a post code or name of a town or city;
- Your contact with us, such as a note or recording of a call you make to one of our contact centres, a web chat, an email or letter sent, or other records of any contact with us;
- Your account information, such as dates of payment owed or received, subscriptions you use, account numbers or other information related to your account or included in My Vodafone;
- Credential information – we’ll collect passwords, hints and similar security information used for authentication and access to accounts and services;
- Your preferences for particular products, services and lifestyle activities when you tell us what they are, or we assume what they are, based on how you use the products and services;
- See Our Cookie Policy section for details on what we collect using cookies, web beacons and other technologies, including ad data;
- Your browsing history. If you have given your permission Vodafone collects the categories of website you have browsed on your mobile, device or PC, for example Sports, Music or News. However, we don’t have a history of the sites you browse, as this is limited for a short period of time to enable the connection to be made. We use these interests to send you personalised marketing or show you personalised advertising. You can opt out of advertising through Our Cookies Policy or, in the case of marketing, read more on how you can opt-out on Your Privacy Settings section of this policy,
- We can also obtain, from other data providers such as social media agencies, data related to demographic data, interest based data, and internet browsing behaviour (see *Third Party Cookies* in Our Cookie Policy section of this policy).
- Other Information we obtain from other sources, such as credit agencies and fraud-prevention agencies.

We’ll also get information about how you use our products and services, such as:

- The level of service that you receive – for example, network or service faults and other events that may affect our network services or other services;
- Details of your use of the specific services or products, for example:
 - When subscribing to a Fixed Service connection, a record is kept as to where the service was subscribed to be used in and where the service is actually being used in. Also the MAC address is used for allowing the device to communicate with other devices in the same network with it. This is essential for the network to function.
 - Every time you use your mobile phone, a record is kept. This includes the number you called or sent an SMS or MMS to, the length, date and time of that call, SMS or MMS and your approximate location at the time that the communication takes place (based on the location of the nearest cell that you sent that call or message from), the date and amount of data usage on your phone. The same is also recorded every time you receive an incoming call or message. We don’t, however, keep a record of the content of your calls and messages. From time to time when you contact our customer services on any channel, this may be recorded for quality assurance and training purposes, but these recordings are retained so that any issues can be taken up.

How we use your personal information

We will use your personal information for the following purposes:

1. To provide you with your service

Processing your order and provide you with your products and service

- To process the products and services you’ve bought from us, keep you updated with the progress of your order and ensure compliance with the products’ and services’ T&Cs;

- To provide the relevant product or service to you. This includes other services not included in your agreement with us (e.g. internet banking services offered by local banks), services that use information about where you are, and to make contact with you through messages about changes to the products or services.

Billing and Customer Care

- To bill you for using our products and services, or to take the appropriate amount of credit from you;
- Contact you if the billing information you provided us with is about to expire or we're not able to take payment;
- To respond to any questions or concerns you may have about our network, products or services-
- To monitor communications sent by Vodafone for training and quality purposes.
- For troubleshooting purposes in order to rectify any fault which is raised by the customer

Service messages

- We will contact you with customer service messages to keep you updated with current information about products and services you've used. For example, changes to our terms and conditions, price plan and data use, upgrades you might be entitled to, roaming or service interruptions.

Provide Roaming Services

- To improve your roaming experiences, to ensure that we're meeting our commitments around fair use, to detect and resolve fraudulent use of our networks (and our partner roaming networks) and to solve technical issues if you are experiencing.
- To understand how Vodafone is performing in providing roaming services, whether Roaming Services and related products are working as intended, or whether improvements are needed to make roaming better.
- To guarantee the interconnection service towards the network of the other operators and for the ability to affect payments in regards to this service.

Vodafone uses personal data such as your name, email address, password, mobile phone number and call records in order to do this. Vodafone creates aggregated and statistical management reports from this information that do not identify you individually. Vodafone may also take this personal data and anonymise it so that more in-depth analysis of our roaming services can be undertaken. This helps Vodafone to develop its roaming services for customers without identifying users in an individual way.

2. To improve our service

Improving and innovating our products and services

- We collect anonymous, de-identified or aggregate usage and account related information in order to improve the services we offer to everyone. None of these analytics are linked back to you in any way.

Manage our networks and understand network usage

- To protect our networks and manage the volumes of calls, texts and other uses of our networks. For example, we identify peak periods of use so we can try and ensure the networks can handle the volume at those times;
- To understand how you use our networks, products and services. That way we can seek to review, develop and improve these, develop more interesting and relevant products and services, as well as personalising our products and services.

3. Marketing & tailoring our service to you

Direct Marketing and Profiling

- As our customer we will contact you to let you know about products and services of Vodafone and Vodafone Group companies (unless you opt out of such marketing messages from us). We will use your contact details to record your preferences and to keep you informed generally about new products and services, send you newsletters, invite you to participate in a survey or let you know about offers, promotions, prize draws or competitions. We tailor these messages based on the sorts of products and services you've bought from us (referred to by us as *Basic Profiling*). For example, we know not to market to you any top-up related products if you're on a contractual subscription.

- Also, we will further tailor these messages using your aggregated browsing, calling and messaging invoiced activities unless you have withdrawn permission for us to process this information for this purpose;
- We can personalise these messages also using location information (referred by us as *Advanced Profiling*), if you have given your permission that we process this information for this purpose.
- If you have given your permission, we will also contact you to let you know about products and services of other third party partner companies which we think may interest you (referred by us as *Third Party Offers*). For more information on third party partners, read more on How we share your personal information section on this policy;
- We'll contact you by SMS, post, email, call or push notifications through our apps.
- We may also engage third parties to send communications on our behalf (for more information see How we share your personal information section in this policy).
- If you are not our customer but have provided personal information along with your permission to be contacted about products and services of Vodafone and Vodafone Group companies we will contact you to let you know about these products and services. We will use your contact details to keep you informed generally about new products and services, or let you know about offers, promotions, prize draws or competitions. You can object to direct marketing at any time. For more information on how to object, visit Your Rights section below.

Advertising online

- To deliver advertising that is relevant to you, you'll also see targeted advertising online based on the use of cookies. This is known as interest-based advertising. It can be on websites or apps belonging to Vodafone Malta or the Vodafone Group, those of other organisations, as well as other online media channels such as social media sites. We may also combine data collected via the cookies with other data we have collected. If you don't want any information processed through the use of cookies, check Our Cookie Policy section. It explains how to opt out of cookies.
- To serve advertising messages that are particularly relevant to you, we may engage with third parties to deliver these adverts. In doing so we may share your contact details (limited to email or mobile number) with parties such as Facebook Inc (Facebook Products such as Instagram and Whatsapp) and Alphabet Inc. (such as Google). If you don't want to receive Vodafone personalised adverts from third parties, check Our Cookie Policy section. For information on how to manage your marketing permissions with Vodafone go to Your Privacy Settings section on this policy.
- Remember that opting out of interest-based advertising won't stop advertisements from being displayed – but they won't be tailored to your interests.

Research and analytics

We use a variety of analytics methods including what is commonly referred to as “Big data analytics”. Big data analytics are a mathematically driven analysis techniques where large and varied data sets (that is why it is “big” data) to uncover hidden patterns and hitherto unrevealed trends. At Vodafone we take governance of big data analytics seriously. Our data scientists are required to sign up to a Code of Ethics. We have a strict use case process that requires that privacy and data protection law checks are carried out before any use case commences. We have strict rules ensuring that personal information is anonymised or de-identified at the appropriate stage in the process.

We use our analytics to:

- Market research and to carry out research and statistical analysis including to monitor how customers use our networks, communication channels, products and services on an anonymous or personal basis;

We do not use analytics for automated decision-making (that is, decision making with no human involvement) which would produce legal effects or other similar significant impacts on you.

4. Non Marketing Profiling

We will sometimes need to profile you, for credit, fraud and security purposes.

Credit checks and ID

- We will carry out a credit check when you apply for a contract for any products or services with us.
- We will also use your personal information for identity verification purposes, for access to your account and for general account management. We sometimes supplement the information we collect about you with information from other sources (e.g. the electoral registry) to assess the accuracy of the information that we have.

The information that you provide upon subscribing to a product or service with us will be used for the following purposes:

- The personal information that you provide when you apply for a post-paid subscription with Vodafone such as your name & surname, address, identification verification, and date of birth - will be used to carry out a credit check with licensed credit vetting agencies, and to verify your identity. This is to protect you from identity theft and Vodafone from fraudulent credit applications.
- Information held about you by the credit vetting agencies may already be linked to or associated with records relating to one or more of your partners where you have associated or joint financial arrangements. When you apply for a post-paid contract, Vodafone will assess any cases linked with the information you provided. You may only decline the cases if you declare that such a financial link does not have any adverse effect on your application. We will check the validity of your declaration with the credit reference agencies and if we discover any associated records, which would affect the accuracy of this declaration we may decide not to proceed with the application on this basis. If you still wish to proceed our sales agents will need to contact our Fraud Department who will carry out additional reviews.
- If your application is still declined following a credit check, it is because of information held by the below credit vetting agencies used by Vodafone Malta which you can contact on:

Credit Info

199,
Eucharistic Congress Road,
Mosta
MST 9036
Malta

Tel: +356 2131 2344

Email: info@creditinfo.com.mt

Web Address: <http://creditinfo.com.mt/>

- If your contract gets financially disconnected, we will disclose account details including client's ID card number and amount due to the credit vetting agencies (Malta Association of Credit Management and Credit Info). This information will be retained by the credit vetting agencies, and may be used by us and other organisations to help make decisions about other credit applications made by you or members of your household with whom you are linked financially. For those cases that are passed to our debt collector and court cases opened, we would need to supply the information requested by court such as account details, payment history, payment defaults, account balances, disputes, queries and debts. Any information we hold about your account will also be used for debt tracing and claims assessments. In the event that you do not repay in full and on time, we may tell credit reference agencies who will record the outstanding debt. Once all pending and outstanding balances are cleared, Vodafone will update the credit agencies.

Fraud Prevention & Security

- We will process your traffic data in order to protect against and detect fraud, to protect and detect misuse or damage to our networks, to recover debts or trace those who owe us money resulting from the use of our services.

How we share your personal information

Where applicable, we share information about you with:

- Companies in the Vodafone Group. For more information go to <http://www.vodafone.com/content/index/about/where.html>
- Partners or agents involved in delivering the products and services you've ordered or used;
- Companies who are engaged to perform services for, or on behalf of, Vodafone Limited, or Vodafone Group;
- Credit reference, fraud-prevention or business-scoring agencies, or other credit scoring agencies for more information, see Credit Checks and ID section under How we use your personal information section on this policy;
- Debt collection agencies or other debt-recovery organisations;
- Law enforcement agencies, government bodies, regulatory organisations, courts or other public authorities if we have to, or are authorised to by law;

- A third party or body where such disclosure is required to satisfy any applicable law, or other legal or regulatory requirement;
- Emergency services (if you make an emergency call), including your approximate location;
- Third parties for joint promotions with that third party. They'll be responsible for their own compliance with applicable privacy laws;
- Other third parties for authentication and fraud-prevention purposes.

Fraud management and law enforcement

- We will release information if it's reasonable for the purpose of protecting us against fraud, theft, money laundering, defending our rights or property, or to protect the interests of our customers.
 - If we suspect or detect that false or inaccurate information has been provided and fraud is identified, we can pass the details to fraud-prevention agencies and other telecommunication providers. We, and other organisations, may also access and use this information to prevent fraud, theft and money laundering, for example, when:
 - checking details on applications for credit or other credit-related facilities
 - managing credit and credit-related accounts or facilities
 - managing credit card use
 - managing abnormal phone usage
 - recovering debt
- We, and other organisations, may also access and use any information recorded by fraud-prevention agencies from other countries.
- We also may need to release your information to comply with our legal obligation to respond to the authorities' lawful demands. Your personal data shall only be provided when we in good faith believe we are obliged to do so in accordance with the law and pursuant to an exhaustive evaluation of all legal requirements.

Mergers and Acquisitions

If we're reorganised or sold to another organisation we will provide your information to that organisation.

Third parties that we work with

Where you've purchased Vodafone products and services using a third party or partner organisation, we often need to exchange information with them as part of managing that relationship and your account – for example, to be able to identify your order and be able to pay them.

If we have a contract with a service provider or contractor to provide us with services or provide a service on our behalf, and they may have access to your personal information, we don't authorise them to use or disclose your personal information except in connection with providing their services.

We collect and combine information in order to monitor your use of products and services, and that of our other customers, as well as to help us to improve the quality of our products and services. We provide this information to third parties (for example, to content providers and advertisers) but any such third party reporting shall not include information which may identify an individual customer. Also see in How we use your personal information section on this policy under the heading of *Advertising online*.

If you have given consent, we may contact you on behalf of any of our third party partner companies. We do not share your personal information with these companies for this purpose. Such third party partner companies may include any commercial and non-commercial organisations for example philanthropic associations, wholesalers and retailers, entertainment, health services, transportation industry, hospitality and restaurateurs, aviation, communication and information technology industry, real estate agencies, financial and insurance companies. This shall not be considered as an exhaustive list.

From time to time, with your permission, we may use third party social media platforms to validate users' identification such as date of birth. We may also use third party social media, communication including automated customer service channels and platforms.

We will not share customer personal data that we hold with these platforms for this process however as these third party's terms and conditions and privacy and cookies policies will separately apply to how they use your personal information which may include commercial purposes – please read them carefully before sharing your personal data.

Third party products that you buy through your Vodafone account

Where you buy a third-party product or service through your Vodafone account (such as a mobile application), the contract for it is with the party selling that product or service. Vodafone is only charging the amount directly to your bill as part of its arrangements with the seller. As part of this, you're agreeing that Vodafone may pass certain personal information to the seller to complete your purchase with them.

The seller's terms and conditions and privacy and cookies policies will apply to how it uses your personal information – please read them carefully.

International Data Transfers

We may need to transfer your personal information to other Vodafone Group companies (for more information go to <http://www.vodafone.com/content/index/about/where.html>) or service providers in countries outside the European Economic Area (EEA). The EEA consists of countries in the European Union, Switzerland, Iceland, Liechtenstein and Norway: they are considered to have equivalent laws when it comes to data protection and privacy. This kind of data transfer may happen if our servers (i.e. where we store data) or our suppliers and service providers are based outside the EEA, if you use our services and products while visiting countries outside this area or if we make use of providers who provide Vodafone with a service which requires personal information

If Vodafone sends your personal information to a country that is not in the EEA, we will make sure that your personal information is properly protected. We will always ensure that there is a proper legal agreement or mechanism that covers the data transfer. In addition, if the country is not considered to have laws that are equivalent to EU data protection standards then we will ask the third party to enter into a legal agreement or mechanism that reflects those standards.

How long we keep your personal information for

We'll store your information for as long as we have to by law. If there's no legal requirement, we'll only store it for as long as we need to.

We're required by law to keep certain personal information about how you use our services for 12 months. Some account information will be held for 5 years from your end of your contract or last transaction, whereas some personal information may be legally required for accounting purposes to be held for 10 years from the end of your contract or last transaction with us.

We'll keep some personal information for a reasonable period after your contract with us has finished in case you decide to use our services again. We, or one of our partners, may contact you about Vodafone services during this time if you haven't opted out of receiving marketing communications from us.

Keeping your personal information secure

We have specialised security teams who constantly review and improve our measures to protect your personal information from unauthorised access, accidental loss, disclosure or destruction.

Communications over the internet (such as emails) aren't secure unless they've been encrypted. Your communications may go through a number of countries before being delivered, as this is the nature of the internet.

We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

We'll never ask for your secure personal or account information by an unsolicited means of communication. You're responsible for keeping your personal and account information secure and not sharing it with others.

Our website may provide links to third-party websites. We cannot be responsible for the security and content of such third-party websites. So make sure you read that company's privacy and cookies policies before using or putting your personal information on their site.

The same applies to any third-party websites or content you connect to using our products and services.

You may choose to disclose your information in certain ways such as social plug-ins (such as Google, Facebook, Twitter and Pinterest) or using third-party services that allow you to post reviews or other information publicly, and a third party could use that information.

Social plug-ins and social applications are operated by the social network themselves and are subject to their own terms of use and privacy and cookies policies. You should make sure you're familiar with these.

Your rights

Right to correct personal data

You have the right to have personal information held about you corrected if it is not accurate. If what we hold on you needs updating, or you think it may be inaccurate, please fill out the online form here and email or post it to the address on the form. Alternatively, you can contact our [Customer Services](https://www.vodafone.com.mt/contact-us) (<https://www.vodafone.com.mt/contact-us>) team.

Right to access personal data

You have the right to make a request for a copy of the personal data that Vodafone holds about you. To make this request as an individual or an authorised 3rd party, please fill out the online form here and email or post it to the address on the form. Alternatively, you can contact the [Customer Services](https://www.vodafone.com.mt/contact-us) (<https://www.vodafone.com.mt/contact-us>) team.

Right to data portability

You have the right to be able to take with you your data you provided to us in certain circumstances. For example, Vodafone ensures that you can take your data with you by allowing you to download your monthly bills, at the click of a button, in a format of your choice. In order to do this, log in to [My Vodafone](https://www.vodafone.com.mt/myVodafone-notlogged) (<https://www.vodafone.com.mt/myVodafone-notlogged>) and go to your billing area. If the information you require is not available via My Vodafone, please fill out the online form here email or post it to the address on the form. Alternatively, you can contact the [Customer Services](https://www.vodafone.com.mt/contact-us) (<https://www.vodafone.com.mt/contact-us>) team.

Right to object to use of personal data

You have the right, in certain circumstances, to object to Vodafone processing your personal information.

To opt out of marketing messages:

If you no longer want to receive marketing messages from Vodafone, you can select to opt out of all marketing communications or only selected methods (email, SMS, phone call or post or survey).

There are various ways to opt out:

- Log in to your [My Vodafone](http://www.vodafone.com.mt/mypermissions) (<http://www.vodafone.com.mt/mypermissions>) account and go on My Profile to manage your privacy settings; your privacy settings will also provide you with the ability to opt out or into receiving personalised marketing;
- Contact our [Customer Services](https://www.vodafone.com.mt/contact-us) (<https://www.vodafone.com.mt/contact-us>) team;
- Click the link to access your Privacy Settings at the end of a marketing email or SMS to unsubscribe;
- Tell the adviser if you no longer want to receive a marketing call;
- If you are a business customer, by calling or sending an email request to your respective Account Manager, who will in turn pass it on to the Enterprise Support Team to process;
- Disable push notification messages, at any time in our apps by changing the notification settings on your device or by uninstalling the app.

Opting out of marketing messages does not mean that you will stop receiving service-related messages.

To opt out of receiving marketing communications from other Vodafone Group companies, just contact them directly.

In some cases, you may receive marketing from Vodafone, even if you're not a customer or never had contact with Vodafone. This is a result of third-party marketing lists which Vodafone may acquire from time to time. If you've registered to opt out of such marketing, you shouldn't receive such communications. If you do, we ask that you let us know immediately.

To manage Cookies and understand more about what they are:

Want to disable a cookie, or understand more about what these are? Check Our Cookies Policy section of this policy for full details on how to do this.

To object to other processing where we rely on our legitimate interests:

Please fill in the here below form and press send so we can look into it and get back to you within 30 calendar days from receipt of objection. Alternatively, you can contact the [Customer Services](https://www.vodafone.com.mt/contact-us) (<https://www.vodafone.com.mt/contact-us>) team.

How to lodge a complaint

If you want to contact us about any of your rights or should you wish to complain about how we use your personal information, contact our [Customer Services](https://www.vodafone.com.mt/contact-us) team (<https://www.vodafone.com.mt/contact-us>), fill out the Individual Rights Request Form here and email or post it to the address on the form.

Alternatively, you can email our Privacy team directly on privacy.mt@vodafone.com. We'll do our best to help but if you're still unhappy, you can contact the IDPC – their details are at <https://idpc.org.mt/en/Pages/Home.aspx>

Right to restrict use of your data

If you feel that the personal data we hold on you is inaccurate or believe we shouldn't be processing your data, please fill out the Individual Rights Request Form here and email or post it to the address on the form or contact our [Customer Services](https://www.vodafone.com.mt/contact-us) (<https://www.vodafone.com.mt/contact-us>) team to discuss your rights. In certain circumstances you will have the right to ask us to restrict processing.

Right to erasure

Vodafone strives to only process and retain your personal data for as long as we need to which is in accordance with the law, our retention periods and your restriction rights. In certain circumstances you have the right to request that we erase your personal data that we hold. If you feel that we are unlawfully retaining your data longer than we need, it is worth first checking that your contract with Vodafone has been terminated which you can do with [Customer Services](https://www.vodafone.com.mt/contact-us) (<https://www.vodafone.com.mt/contact-us>) team. If your contract with Vodafone has been terminated, we may still have lawful grounds to process your personal data (for more information on retention periods see How Long We Keep Your Personal Information for) or to make a request, fill out the Individual Rights Request Form here and email or post it to the address on the form.

Privacy and Our Products and Services

My Vodafone app privacy supplement

This Supplement defines how your information is used by My Vodafone app and should be read in conjunction with Our Privacy and Cookie Policy.

My Vodafone app is a service that offers you a tool for self-help functionality over an application through which you can purchase bundles, top-up, check credit balance and also pay bills.

When you download or use My Vodafone app, information may be accessed from or stored on your device. This will let it operate and function as well as remember you.

To provide you with the service, communicate with you and to work to improve our services, we'll need to collect information about your device (for example, type, unique identifiers, its operating system, for example if you're using 3G or 4G, etc.), app ID and information about your use of the app. Additional information may also be collected to provide you with the requested service, refer to Personal Information we collect about you section in this policy.

My Vodafone app will set out the preferences it requires to operate, some of which you may be able to opt out. My Vodafone app may require access to your device's location data (not for marketing purposes) and device may also be set to send push notifications as a default setting. You may amend device location collection and push notifications directly on your device's app settings, however, it may affect the functionality of certain services of the My Vodafone app.

We collect personal information from the use of cookies and similar technologies. To learn more on how we use cookies refer to Our Cookie Policy section in this policy.

For more information on how we use the personal data we collect from the My Vodafone app including marketing and advertising, refer to How we use your personal information section in this policy.

It's important to flag that, where you choose to download or use an app not operated by Vodafone, those apps are subject to their own terms of use and privacy and cookies policies. Make sure you're familiar with those before downloading or using that app. We can't be responsible for the security and content of such third-party apps.

Vodafone Future Jobs Finder Privacy Supplement.

This privacy statement explains the information collected as part of Vodafone Future Jobs Finder and how it is used. We take the privacy of our users very seriously. We ask that you read this privacy statement ('Statement') carefully as it contains important information about how we will use your personal data.

Who we are

The entities processing your data are Vodafone Group Services Ltd as the data controller and cut-e as our third party service provider, acting on Vodafone's instructions.

Outside of cut-e, we will not share your personal data with other third parties.

For more information about Vodafone's privacy policy or practices, or to exercise your data protection rights, you can contact us at Ask.GroupPrivacy@vodafone.com or write to:

Global Privacy Team – Group Legal
Vodafone Group Services Limited
Vodafone House
The Connection
Newbury
RG14 2FN
England

Your national Data Protection Authority is:

The Information Commissioner's Office
Water Lane, Wycliffe House
Wilmslow - Cheshire SK9 5AF
Tel. +44 1625 545 745
e-mail: international.team@ico.org.uk
Website: <https://ico.org.uk>

Using Future Jobs Finder as a "guest"

You can use Future Jobs Finder either as a guest or by creating an account after you have taken a quiz. If you don't chose to create an account, we collect only limited data (your responses associated to a unique ID) and once you've ended your session by closing the browser, this data is deleted and is not retained. Alternatively, if you create an account after taking a quiz, the results will be stored on your account.

The data we collect

We collect the following types of information as part of the Vodafone Future Jobs Finder service:

Your identification information (such as your email address)

Third party log in details (for example, if you choose to make an account with a third party log in, such as Facebook, we will receive confirmation and successful verification information)

Questionnaire answers (your input into our questions and your liked and deleted job suggestions)

Job relevance (based on data such as where you are located, your age and what your job history may be)

Technical information (such as public IP address, time and date of access, how you navigate on our site, browser settings)

What we do with your data

We process your personal data to provide you with the Vodafone Future Jobs Finder service, which is the facilitation and successful delivery of our personality assessment and job recommendation service. Because of this, we rely on the performance of this service as our lawful basis to process your data. Therefore, if you do not wish for your data to be processed according to this Statement, we would not be able to provide you with this service.

The Vodafone Future Jobs Finder service involves:

Personality testing and questionnaires (the amount and extent to which you complete these tests is optional);
Recommending your personal strengths based on the results of these tests;
Providing links to appropriate training based on your assessment input;
Providing links to an ongoing interactive job board based on your input; and
Technical provision and optimisation of the service.

How long we store your data

Your personal data will be stored for as long as you choose to continually use this service, or for a period of 12 months after inactivity. We store your data for this period, in case you choose to revisit the service. If you wish to erase your personal data at any point before this, this option is available to you in your account settings.

Your rights

You have a number of rights you can exercise over your personal data. To discuss these in more detail or to exercise them, please contact us via the details provided in the “Who we are” section at the top of this Statement.

Access: You can request a copy of your information and details on how we have processed it.

Rectification: If you believe the data we hold on you is inaccurate, you can request we update it.

Erasure: You can request we delete your personal data if you no longer wish for us to process it.

Restriction: If you wish for us to cease processing your data, you can request this.

Portability: You can request a copy of your information to take to another company.

Objection: You can object to us processing of your information, if we are processing it based on our legitimate interests, or in the context of direct marketing. Given we do not conduct these types of processing for Future Jobs Finder, this would not be applicable in this context.

Vodafone Shake X Factor App Privacy supplement.

This Supplement defines how your information is used by Shake X Factor App and should be read in conjunction with Vodafone Privacy and Cookie Policy.

Shake X Factor App is a service that offers you a tool for accessing content, news and marketing related to X Factor programme over a mobile application through which you can interact with the content (through likes, shares, poll participation, voting information).

When you download or use Shake X Factor App, information may be accessed from or stored on your device. This will let it operate and function as well as remember your device.

To provide you with the service, communicate with you and to work to improve our services, we'll need to collect information about your device (for example, type, unique identifiers, its operating system, for example if you're using 3G or 4G, etc.), app ID and information about your use of the app. This is done through the use of cookies and similar technologies. To learn more on how we use cookies refer to Vodafone Privacy and Cookie Policy section in this policy. The Shake X Factor App does not collect any information that may identify you as an individual customer.

We collect personal information from the use of cookies and similar technologies. To learn more on how we use cookies refer to Our Cookie Policy section in this policy.

It's important to flag that, where you choose to download or use any other app, not operated by Vodafone, those apps are subject to their own terms of use and privacy and cookies policies. Make sure you're familiar with those before downloading or using that app. We can't be responsible for the security and content of such third-party apps.

Our Cookie Policy

How we use cookies

We use cookies to keep track of what you've bought from us and what you've done on My Vodafone app and Vodafone's website. Cookies also mean you can use services such as tracking your order, checking your account or topping up.

Our cookies don't hold personal information such as your name or bank details. Cookies let us find information once you're logged in or help link your browsing information to you and your personal information when you choose to register for a service or newsletter.

To do this we sometimes use persistent cookies. We take looking after your personal information seriously – we're always monitoring and improving how we protect it.

We've put our cookies into the following categories, to make it easier for you to understand why we need them:

1. **Strictly necessary** – these are used to help make our website work efficiently
2. **Performance** – these are used to analyse the way our website works and how we can improve it
3. **Functionality** – these help to enhance your experience by doing things like remembering products you've added to your basket
4. **Targeting/advertising** – these are used to share some information with third parties who we advertise with, so we know how you've reached our website. We can also use cookies to identify the parts of the website you're interested in. We then use this information to show you adverts and pages we think may also be of interest to you, to tailor how we communicate with you, or to tailor the contents of the communications we send to you. If you prefer, you can opt out of these. Tailoring of content means it includes information reflecting the interest you've shown in the content of our web pages, or offers or promotions that we think may interest you, and to improve how we respond to your needs.

In addition to this, sometimes other Vodafone Group companies will add a cookie to show you adverts and pages which may be of interest to you. Details on these, and how to opt out if you prefer, can be found in the 'Third-party cookies' section of this page.

First Party Cookies

Cookie name	Where	What it's used for	Type	Expires
ASP.NET_SessionId	vodafone.com.mt	Handles session management for a visitor on the website	Strictly necessary	Session

VodafoneSection	vodafone.com.mt	Handles navigation between business or consumer section	Strictly necessary	2 years
UniqueGuidCookie	vodafone.com.mt	Required for anti-CSRF (Cross-Site Request Forgery), for security purposes	Strictly necessary	21 minutes
vfcpl	vodafone.com.mt	Controls cookie policy bar behaviour	Strictly necessary	2 years

Cookies and you

To make a purchase online or sign up to services like My Vodafone which gives you access to your Vodafone account, you must have cookies enabled on your internet browser. The more popular browsers are:

- Internet Explorer
- Firefox
- Safari
- Google Chrome
- Opera

If you choose not to enable cookies, you'll still be able to browse our website and app but you won't be able to buy online.

Third Party Cookies

First party cookies originate from the same domain as the website or app you're currently visiting (in this case, www.vodafone.com.mt).

Third party cookies originate from a domain that's different to the website or app being visited. For example, when you visit our website or app, we may link to another company's website – like our Facebook or Twitter account, or a video from our YouTube page.

So, when you 'Like' or 'Tweet' a phone from our website or app or visit our Facebook page, these sites may sometimes put cookies on your computer. We don't control how they use their cookies, so we suggest you carefully check their website or app to see how they're using them and how you can manage them.

Affiliates of the Vodafone Group with a different domain name may also place cookies on our website and app, to show you adverts or pages of other Vodafone Group companies that may be of interest to you. If we use Affiliates, details of any affiliates – and how to opt-out – are included in the table.

Third parties that may put cookies on our website are:

Cookie name	Where	What it's used for	Type	Expires
utag_main	vodafone.com.mt	Tealium is a third party provider and maintains a single cookie. Within this cookie are several built-in values that keep track of the visitor session including the number of sessions/pages viewed on the website. Refer to http://tealium.com/privacy/ for more information.	Strictly necessary	1 year
<ul style="list-style-type: none"> • IDE • ANID • DSID 	vodafone.com.mt	DoubleClick uses cookies to improve advertising, by targeting adverts based on what's relevant	Targeting/advertising	-

<ul style="list-style-type: none"> • FLC • AID • TAID • exchange_uid 		<p>to the user, to improve reporting on campaign performance and to avoid showing adverts that the user has already seen.</p> <p>'IDE' and 'ANID' cookie is stored in browsers under the domain doubleclick.net.</p> <p>Other cookies have names such as DSID, FLC, AID, TAID, and exchange_uid, and are used to link your activity across devices if you've previously signed in to your Google Account on another device. This is done to coordinate the ads that are seen across devices and measure conversion events.</p> <p>DoubleClick cookies contain no personally identifiable information.</p> <p>You can opt out Ads Settings on your google account. Refer to http://www.google.com/intl/en/policies/privacy/ for more information.</p>		
mbox	vodafone.com. mt	<p>Cookie set by Adobe Test and Target. Within this cookie are several built-in values:</p> <ul style="list-style-type: none"> • session ID - A unique ID for a user session. By default, this lasts 30 minutes. • pc ID - A semi-permanent ID for a visitor's browser. Lasts until cookies are manually deleted. • check - A simple test value used to determine if a visitor supports cookies. Set each time a visitor requests a page. • disable - Set if visitor's load time exceeds the timeout configured in the mbox.js file. By default, this lasts 1 hour. <p>To opt out visit http://www.adobe.com/privacy/marketing-cloud.html</p>	Targeting/advertising	2 weeks from last login
_ga	vodafone.com. mt	<p>Google Analytics used to distinguish users.</p> <p>Refer to http://www.google.com/intl/en/policies/privacy/ for information on how to opt out of such cookies.</p>	Performance	2 years

_gid	vodafone.com. mt	Google Analytics used to distinguish users. Refer to http://www.google.com/intl/en/policies/privacy/ for information on how to opt out of such cookies.	Performance	24 hours
_gat	vodafone.com. mt	Google Analytics used to throttle request rate. Refer to http://www.google.com/intl/en/policies/privacy/ for information on how to opt out of such cookies.	Performance	1 minute
AMCV_###@AdobeOrg	vodafone.com. mt	Adobe Experience Cloud Solutions used for Unique visitor IDs. To opt out visit http://www.adobe.com/gr_en/privacy/marketing-cloud.html	Performance, Targeting/advertising	2 years
s_cc	vodafone.com. mt	Adobe Experience Cloud Solutions to set and read by the JavaScript code to determine if cookies are enabled. To opt out visit http://www.adobe.com/gr_en/privacy/marketing-cloud.html	Performance, Targeting/advertising	session
s_sq	vodafone.com. mt	Adobe Experience Cloud Solutions set and read by the JavaScript code when the ClickMap functionality and the Activity Map functionality are enabled; it contains information about the previous link that was clicked on by the user. To opt out visit http://www.adobe.com/gr_en/privacy/marketing-cloud.html	Performance, Targeting/advertising	session
s_vi	vodafone.com. mt	Adobe Experience Cloud Solutions. Unique visitor ID time/date stamp. To opt out visit http://www.adobe.com/gr_en/privacy/marketing-cloud.html	Performance, Targeting/advertising	2 years
s_fid	vodafone.com. mt	Adobe Experience Cloud Solutions as a fallback unique visitor ID time/date stamp. To opt out visit http://www.adobe.com/gr_en/privacy/marketing-cloud.html	Performance, Targeting/advertising	5 years

QSI_HistorySession	vodafone.com. mt/email	Qualtrics cookie to track the URLs of the web pages that the user visited. To opt out visit http://www.qualtrics.com/privacy-statement/	Functionality, Targeting/advertising	Same day
QSI_S_{ZoneID}	vodafone.com. mt/email	Qualtrics cookie value is "{v r}:{1}:{2}," where "v" means visitor sampling, "r" means request sampling, variable 1 is the percentage (for the individual visitor), and variable 2 is the number of times the visitor has visited the site. To opt out visit http://www.qualtrics.com/privacy-statement/	Functionality, Targeting/advertising	1 week
QSI_SI_{id}_intercept	vodafone.com. mt/email	Qualtrics cookie used to track whether we should display the Intercept on repeated user visits. To opt out visit http://www.qualtrics.com/privacy-statement/	Functionality, Targeting/advertising	-
QSI PopUnder_PopUnderTarget_SI_{id}	vodafone.com. mt/email	Qualtrics cookie that prevents multiple windows from crowding a client by checking if other Pop Unders are being displayed already, and preventing repeated display. To opt out visit http://www.qualtrics.com/privacy-statement/	Functionality, Targeting/advertising	-
RT	vodafone.com. mt	SOASTA cookie that contains various pieces of information about the user's session. The individual subfields are as follows: <ul style="list-style-type: none"> • bcn - The URL that beacons will be sent to. • cl - The timestamp of the most recent click event (epoch millis). • dm - The mPulse-instrumented domain. • hd - The timestamp of the previous page's pagehide event (epoch millis). • nu - The URL of a link on the current page that the user clicked on/submitted a form to in order to leave this page. • obo - The number of pages visited in this session 	Performance	-

		<p>where Boomerang could not measure the page load time.</p> <ul style="list-style-type: none"> • r - The URL of the previous page visited in this session. • rl - Rate limited flag. 1 if rate limited. • se - Session expiry length (in seconds). • sh - Session debugging information for the last 5 viewed pages [no longer used]. • si - The unique ID for this session. • sl -The number of pages visited in the session (prior to the current page). • srst -Details of the session prior to it being reset for expiry. • ss -The session start time (epoch millis). • tt - The sum of all page load times within this session. • ul - The timestamp of the previous page's unload event (epoch millis). <p>The cookie is persistent, not a session cookie, and expires after 7 days of inactivity.</p> <p>If the mPulse customer disables session tracking for their site, then this cookie will not be generated.</p> <p>To opt out visit https://www.soasta.com/privacy-policy/</p>		
_hjClosedSurveyInvites	vodafone.com. mt	<p>Hotjar cookie set once a visitor interacts with a Survey invitation modal popup. It is used to ensure that the same invite does not re-appear if it has already been shown.</p> <p>To opt out visit https://www.hotjar.com/legal/compliance/opt-out</p>	Performance	365 days
_hjDonePolls	vodafone.com. mt	<p>Hotjar cookie set once a visitor completes a poll using the Feedback Poll widget. It is used to ensure that the same poll does not re-appear if it has already been filled in.</p>	Performance	365 days

		To opt out visit https://www.hotjar.com/legal/compliance/opt-out		
_hjMinimizedPolls	vodafone.com. mt	Hotjar cookie set once a visitor minimizes a Feedback Poll widget. It is used to ensure that the widget stays minimized when the visitor navigates through your site. To opt out visit https://www.hotjar.com/legal/compliance/opt-out	Performance	365 days
_hjDoneTestersWidgets	vodafone.com. mt	Hotjar cookie set once a visitor submits their information in the Recruit User Testers widget. It is used to ensure that the same form does not re-appear if it has already been filled in. To opt out visit https://www.hotjar.com/legal/compliance/opt-out	Performance	365 days
_hjMinimizedTestersWidgets	vodafone.com. mt	Hotjar cookie set once a visitor minimizes a Recruit User Testers widget. It is used to ensure that the widget stays minimized when the visitor navigates through your site. To opt out visit https://www.hotjar.com/legal/compliance/opt-out	Performance	365 days
_hjIncludedInSample	vodafone.com. mt	Hotjar cookie set as a session cookie to let Hotjar know whether that visitor is included in the sample which is used to generate funnels. To opt out visit https://www.hotjar.com/legal/compliance/opt-out	Performance	365 days
<ul style="list-style-type: none"> • datr • locale • lsd • reg_fb_gate • reg_fb_ref • wd 	vodafone.com. mt	Set by Facebook Connect and Facebook Pixel. These look at the browser you've used, where you are, which pages on our website you've looked at and what you did on the site. This can also allow retrieval of data from Facebook in relation to services you may require upon you giving your consent. To opt out visit https://www.facebook.com/full_data_use_policy	Targeting/advertising	-

<ul style="list-style-type: none"> • DECLINED_DATE • LAST_INVITATION_VIEWS • kampyleInvitePresented • kampylePageLoadedTimestamp • kampyleSessionPageCounter • kampyleUserPercentile • kampyleUserSession • kampyleUserSessionsCount • kampyle_userid 	vodafone.com. mt	<p>These cookies are set by Kampyle, which is used by Medallia to provide survey capabilities to the website.</p> <p>To opt out visit https://www.medallia.com/privacy-policy/</p>	Performance	1 year
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Future Jobs Finder - Use of Cookies

COOKIE	DESCRIPTION	DURATION
NonReg	Generating unique IDs per browser	5 minutes
Google Analytics	Measuring site use behaviour on an aggregate level	3 years
Google Analytics _ga _gat _gid	Measuring site use behaviour on an aggregate level	3 years 1 minute 3 days
.jona.Session	Session cookie	Browser session
.AspNetCore.Antiforgery	Used by core framework for authentication and anti-forgery	Browser session
cookieconsent_dismissed	This cookie is used to serve you the cookie banner	1 day

Controlling your cookies

You can control how you use cookies in your browser.

How to check cookies are enabled for PCs

Google Chrome

1. Click the menu button (three horizontal bars) at the top right of your browser window and select 'Settings' then 'Show advanced settings...
2. Locate the 'Privacy' heading, and select 'Content settings'
3. Now select 'Allow local data to be set'

Microsoft Internet Explorer 11

1. Click on the 'Settings' icon (looks like a cog) at the top right of your browser window and select 'Internet options', then click on the 'Privacy' tab
2. Ensure that your Privacy level is set to Medium or below, which will enable cookies in your browser

3. Settings above Medium will disable cookies

Mozilla Firefox

1. Click the menu button (three horizontal bars) at the top right of your browser window and select Options
2. Then select the Privacy icon
3. Click on Cookies, then select 'allow sites to set cookies'

How to check cookies are enabled for Macs

Safari on OXX

1. Click on 'Safari' at the top of your browser window and select the 'Preferences' option
2. Click on 'Privacy'
3. Select 'Allow from websites I visit'

Block cookies

If you'd like to find out how to stop websites using cookies to remember what sites you visit, choose your browser from the list. This will take you to the browser's respective page where you can manage your cookies and site data:

[Chrome](#)

[Safari](#)

[Firefox](#)

[Internet Explorer](#)

If you change your cookie settings in your browser, your experience with us won't be tracked. Information on controlling and deleting cookies is also available at <http://allaboutcookies.org>

Your Privacy Settings

You can view and manage your contact preferences and control how Vodafone uses your information to create offers tailored for you. There are various ways you can manage these:

- Log in to your [My Vodafone](http://www.vodafone.com.mt/mypermissions) (<http://www.vodafone.com.mt/mypermissions>) account and go on **My Profile** section on your account and access **Manage your privacy settings** button to access your marketing permission page. Remember to press **Save** button to save your preferences at the end;
- Contact our [Customer Services](https://www.vodafone.com.mt/contact-us)(<https://www.vodafone.com.mt/contact-us>) team;
- Click the link to access your Privacy Settings at the end of a marketing email or SMS to unsubscribe;
- Tell the adviser if you no longer want to receive a marketing call;
- If you are a business customer, by calling or sending an email request to your respective Account Manager, who will in turn pass it on to the Enterprise Support Team to process;
- Disable push notification messages, at any time in our apps by changing the notification settings on your device or by uninstalling the app.