

Lobster.

The full English mobile

Privacy Policy

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Lobster
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Register number B87836607

Privacy Policy

Lobster advises that its clients' data will be processed in accordance with the stipulations of the Lobster Privacy Policy.

Who is the Data Controller for your personal data?

The Data Controller responsible for processing your personal data is the entity Zinnia Telecomunicaciones SLU with tax ID ref. B87836607 and registered address at MARÍA TUBAU 3 PLANTA 5, MÓDULO C, MADRID (28050) (henceforth by its Trading Name "Lobster").

We also advise that the Data Protection Officer is the person responsible for ensuring that your fundamental right to personal data protection is respected. You may contact the Lobster Data Protection Officer dpo@lobster.es

For what purpose do we process your personal data?

Lobster processes the Customer's personal data in order to:

- Legalise the contract and provide the Service in accordance with the Contract.
- Provide other services at the request of the Customer
- To improve the service provided: Lobster may use your traffic and localisation data, anonymised and aggregated, for statistical purposes and to understand the service and operational status of the network, in order to guarantee efficient management thereof and develop new features and functionality.
- Provide information about Lobster's services and their use
- Comply with requirements imposed on Lobster by current regulations.
- Credit control and fraud control.

What data are processed and from what sources are they obtained?

Lobster may process the following data:

- Identifying data (name and surnames, ID numbers, Social Security/Mutual insurance, address, telephone, signature, image/voice, electronic signature).
- Electronic communication meta-data (call and SMS records, CDRs, MSISDN, MAC addresses, IP addresses, browser data, and localisation data registries).
- Financial or economic data (billing, bank details, credit card, insurance).
- Data on civil status, date of birth, place of birth, age, sex, nationality.

At the point of signing the contract, the Customer should provide the data marked as obligatory in the corresponding forms. It is not possible for a Customer to enter into a contract if the Customer does not agree to provide any of this data. The Customer guarantees that the information provided is true and accurate and authorises Lobster to request, if it deems it necessary and appropriate, additional or complementary details in order to verify and confirm the Customer's identity.

If the Customer is not the data subject of the data provided (data on dependants, employees, relatives, etc.), the Customer guarantees that they have been authorised by and obtained the data subject's consent to submit their data and they will be liable to Lobster for the same.

Lobster also collects the Customer's personal data through its customer assistance channels and traffic data generated through their use of Lobster's Service. We also collect information from certain organisations when we have a legal motive or legitimate reason for doing so. These include fraud-prevention agencies, credit-verification agencies and network providers.

What is the legal basis for processing your data?

Processing your personal data is necessary for the provision of the agreed service and, when relevant, for Value-Added Services, and to send communications about improvements or updates to the agreed services, as well as other purposes that the Customer allows or authorises in their Customer Area. Traffic and localisation data may be processed by Lobster to provide value-added services requested by the Customer, in the manner and for the time necessary to provide said services, with the option of requesting their deactivation at any time.

In addition, some data processing on traffic and electronic communications metadata is legitimately required due to compliance with the following regulations: Law 25/2007 of 18 October, on the retention of data relating to electronic communications and public communications networks; Law 9/2014 of 9 May, on Telecommunications and its development regulation; Regulation (EU) 531/2012 on roaming.

To whom is your data communicated?

For any of the purposes mentioned, Lobster may subcontract the processing to trusted suppliers. These third parties are considered Data Processors and therefore will not process the personal data for their own purposes or any purpose other than the ones established in the General Terms and Conditions. However, Lobster ensures that all these entities comply with the data protection regulation, which is also directly applicable to Data Processors. In particular, data may be communicated to companies within the Group, in order to provide Customer Services to the Customer. They may also be communicated to third parties who manage fee collection for the agreed services.

How long will we store your data?

The Customer is advised that, in compliance with the principal of limiting the period of retention, the collected data will solely and exclusively be processed for the necessary time and for the purposes for which they were originally collected. They will be stored in a way that enables identification of data subjects for no longer than is necessary for the purpose of processing the personal data or responding to possible claims under the Civil Code or fiscal regulations.

As a general rule, customer data (identifiable, contact, or billing data) shall be stored for a period of 5 years from the end of the contractual relationship with Lobster. Once this period is

over, Lobster may keep the data blocked for whatever period in which liabilities may arise derived from the Service provided by Lobster to the Client.

Regarding traffic data and communication meta-data, Lobster should comply with certain legal requirements, for example Law 25/2007 of 18 October, on the retention of data relating to electronic communications and public communications networks, which means storing traffic and localisation information for a period of 12 months in case of a legal requirement to submit it.

What measures do we use to protect your personal data?

Lobster is committed to guaranteeing the security, secrecy and confidentiality of your data, communications and personal information. Therefore, in compliance with current legislation and as part of our commitment, we have adopted the most rigorous, robust security, technical and organisational measures to guarantee the security of your data and prevent its destruction, loss, or illegal access or amendment to it. At the time of determining these measures, criteria were taken into account such as the scope, context and purposes of the processing; the status of the technology and the existing risks.

What are your rights regarding your personal data?

In accordance with the stipulations of the applicable regulation, Lobster informs the Customer that they have the following rights derived from the applicable regulation:

- **Access:** allows the data subject to obtain information about whether Lobster are processing their personal data or not and, if so, the right to obtain information about the personal data being processed.
- **Rectification:** allows errors to be corrected and amendments made to any data that are inaccurate or incomplete.
- **Erasure:** allows data to be erased and Lobster to cease processing it, unless there is a legal requirement to store the data and/or there are no other legitimate reasons for Lobster to process it. For example, when personal data is no longer necessary in relation to the purpose for which it was collected, the Customer may request that we erase them without undue delay.
- **Limitation:** under the legally established terms, this allows data processing to be halted in such a way that it prevents Lobster from processing the data in the future, and they will only be stored for potential use defending against any claims.
- **Opposition:** In certain circumstances, and for reasons relating to their specific situation, data subjects can oppose the processing of their data. Lobster shall cease to process the data, unless there are legitimate overriding reasons to do so, or they are needed for defending potential claims.
- **Portability:** allows the data subject to receive their personal data and be able to transmit it directly to another data controller in a structured, commonly used, machine-readable format. In order to exercise this right, the Customer should provide a valid email address.

The Customer may exercise the above rights by contacting Lobster in writing, (MARÍA TUBAU 3, PLANTA 5, MÓDULO C, 28050 MADRID), by email: personaldata@lobster.es, attaching a copy of their ID document for identification purposes, or through their Customer Area.

Likewise, and in particular when the Customer believes they have not received a satisfactory response when exercising their rights, they may write to the Lobster Data Protection Officer.

They may also submit a claim before the relevant Controlling Authority responsible for Data Protection, which in Spain is the Spanish Data Protection Agency (www.agpd.es).