



Vodafone Appbox Privacy Policy

About Us	Welcome to the Vodafone Appbox (the “Appbox”), provided by Vodafone Limited, a company registered in England (registration number 01471587) and whose registered office is at Vodafone House, The Connection, Newbury, Berkshire, RG14 2FN (“Vodafone”, also “we”, “us” or “our”). Vodafone AppBox will offer you mobile applications that you can choose to install on your phone in a seamless way. The AppBox offers Vodafone applications (such as My Vodafone, Secure Net App) (“Vodafone Apps”) and third party apps (“Third Party Apps”), together in one place for you. You may select and install various applications as set out in the Appbox application catalogue. This privacy policy describes our privacy practices with respect to information we process through the Vodafone Appbox. Vodafone Appbox is available to users from different countries. Accordingly, throughout the document, we try to harmonize our approach and the language of the privacy policy as much as possible. Accordingly, any reference to “GDPR” in the policy means the General Data Protection Regulation (GDPR).
Information we collect	We collect information; 1. Directly – from mobile devices through our application integrated in you device by Vodafone. 2. Indirectly - through app developers that promote their apps through our platform (“Demand Partners”) for optimising their campaigns, as detailed below. Information we collect directly from a device through our application

	<u>Device identifiers:</u> Device’s Advertising ID, IP address, and information about the device and its browser settings. The term Advertising ID refers to the Google Advertising ID. The Advertising ID is a resettable persistent identifier generated by Android that allows us to recognize a device across non-affiliated apps, for purposes such as frequency capping, attribution, fraud detection, and whitelisting. You can find additional information about how to limit our use of the Advertising ID under Section G. “How to Control Your Information”. <u>General technical information about a device:</u> Device CPU, Device CPU supported Architectures, Device manufacturer, Device model, Device product name, Device brand, Device RAM, Device available storage, Device total storage, Limit Ad Tracking status, Device locale, Network type (wifi/cellular data), Operating system name, Operating system fingerprint, Operating system version, Operating system version code, SIM MCC MNC, SIM Operator Name, Network Operator Name, Network MCC MNC, Network Type and other general technical details about a device. <u>Interaction with our recommendations:</u> An indication if a view or click has occurred on a recommendation and the type of app offer that was selected. Information collected directly from you through our application for the purpose of personalizing recommendations (“Personalization Information”) – Your age and gender in case you choose to provide such data to us. Information we may receive from Demand Partners (“Demand Partner Information”) for campaign optimization:
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	<u>Device identifiers</u>: The device's advertising ID, and IP address. <u>Campaign information</u>: an indication that a Demand Partner's app was installed through our platform; information about actions performed within such Demand Partner's app following such an install, including in-app purchases, level in the game, and the number of times you opened the app; and other information that the Demand Partner decides to share with us. Vodafone will process your personal data based on: 1. Vodafone's legitimate business interests; 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 Section G of this policy. 2. Consent you provide; where Vodafone does not rely on another legal basis. Consent is always presented at the point of data collection as part of the device setup; you must accept the terms and conditions and privacy policy before you can proceed and you can withdraw your consent at any time. You may also provide your consent to download third party apps. Vodafone Appbox is an optional service, which you can deactivate at any time. To do so, follow the steps in What choices do you have below.
How we use the information collected	In order to provide the service, we use the information we collect in different ways. Below is a general description of how we use information across our services:

	1. Delivery of recommendations to a device - we use information to technically enable the delivering of recommendations to a device. 2. Reporting and billing - We use information to generate reports for and bill Demand Partners. 3. Attribution - We use information to ensure that we will receive payment for our services. 4. Internal Operations - We use information for internal operations, such as debugging, support, security, providing updates to our application and improving our services. 5. Frequency capping - We use information to limit the number of times a specific campaign is served across our platform. 6. Fraud detection and prevention - We use information for detecting and preventing fraud. 7. Optimisation - We use information collected from a device, and shared by Demand Partners for optimizing Demand Partners' campaigns on behalf of such Demand Partners. 8. Whitelisting/blacklisting - We allow Demand Partners to upload lists of device IDs to include/exclude in their campaigns. 9. Compliance with legal obligations - We may use information to comply with applicable legal obligations.
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What choices do you have	1. Disabling the Vodafone Appbox - You may disable the Vodafone Appbox at any time following completion of initial setup of your device by following the instructions set forth below. If you choose to disable the Vodafone Appbox, we will stop collecting any information from your device. In order to disable the Appbox Platform, please go to Settings - ➤ Apps -> Application List -> [Vodafone Appbox] -> Disable. 2. Erasure and access requests – You may submit deletion and access requests through the following process: Go to Settings -> Apps -> Application List -> [Vodafone Appbox] -> Personal Data. Please note that we will process your request subject to verification and authentication of your identity. This process is available from android v.7 and above. If your Android version is lower than v.7 please refer to Contact details below. 3. Additional data subject rights - Please note that you have the right to request from Vodafone rectification of your personal data we process on their behalf, or to restrict or to object to processing of your personal data in accordance with the provisions of the GDPR. To submit a request for exercising your rights, please contact Vodafone (See below Contact details). 4. Complaint to supervisory authority - You also have the right to file a complaint with the relevant supervisory authority (eg. of your country or domicile) where we have not addressed your concerns. Your local data protection authority is the Information Commissioner's Office (ICO). Their website www.ico.org.uk has details on how to contact the ICO.
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How long we keep your data	We retain information for as long as necessary to fulfil the purposes for which we collected such information, except if required otherwise by law. We may store information for longer periods for archiving or statistical purposes in which case we will take appropriate measures to ensure that the information is used solely for this purpose.
How we share information	Where applicable, we share information about you with: 1. Our corporate affiliates - from which we receive services, such as IT, security, storage, delivery of campaigns, and other internal operations. 2. Demand Partners - for the purposes of attribution and whitelisting/blacklisting, as stated above. 3. Service providers - We share information with our service providers for the purpose of receiving services such as fraud detection and prevention, viewability measurement, reporting, and storage.
International Transfer	If you are located in the European Economic Area, the United Kingdom, or Switzerland, we will transfer your information to the United States based on the Standard Contractual Clauses entered between us and our service providers, or based on an adequacy decision granted by the European Commission.
How we protect your data	Vodafone takes technical and organisational security measures as required by law and by industry standards to protect your personal data from unauthorised access, use or disclosure. We take steps to ensure that we only use your personal information as described in this privacy notice and to honour the permission choices that you have made.

	We only partner with service providers who contract to provide the same level of information security that you can expect from Vodafone.
Changes to this Privacy Policy	We may revise this Privacy Policy from time to time. The most current version of the policy will govern our processing of your information and can be found by going to Settings -> Apps -> Application List -> [Vodafone Appbox] -> Privacy Policy or by contacting Vodafone directly. By continuing to access or use an app containing our services after those changes become effective, you agree to be bound by the revised Privacy Policy.
Contact details	If you have any problem or request, you can contact us directly through the website: https://www.vodafone.co.uk/gdpr-privacy-query-form/ . For more information on how the Appbox is supported on your device visit our Appbox FAQ

Date: 22 June 2022