

Our Privacy and Cookies 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 the Marketplace. The main changes are listed below.

Section	Changes
All	New policy uploaded

Last updated: 1/10/2020

How to use this privacy and cookies policy

In this policy, we explain how we collect, use, share and protect your personal information when you use our products and services and our website on behalf of your company.

Who we are

We are Vodafone Procurement Company, or 'VPC'. We are a member of the Vodafone Group.

In this privacy policy:

- "we/us" means VPC;
- "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.
- 'you' or 'your' means you, using the services on behalf of your employer
- 'company' means your employer
- 'supplier' means the supplier who provides you with ongoing procurement services

Our registered office is Vodafone Procurement Company, 15 rue Edward Steichen, L-2540 Luxembourg, Grand-Duché de Luxembourg, RCS Luxembourg B97920].

You can email us at Marketplace@vodafone.com.

How to contact us

Your opinion matters to us – if you have any questions about our privacy policy, you can email us at: Data Protection Officer contact at Kimberley.frampton@vodafone.com) or you can [contact us](#).

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](#) in our Privacy Centre. We aim to put these commitments at the heart of everything we do.

The basics

Personal information we collect about you

Vodafone will process your personal data based on:

1. **The performance of your company's contract or to enter into the contract** and to take action on your requests. For example, processing payments or subscriptions to fulfil financial commitments or contracts.
2. **Vodafone's legitimate business interests**, for example, fraud prevention and maintaining the security of our network and 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

We will collect your personal information:

- When you register or sign up via the online portals, webforms, telephone, emails and face-to-face meetings to the supplier on-boarding process
- When you contact us through various channels, or ask for information about a product or service;
- When you visit or browse our website or other Vodafone Group websites;
- When you 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; or
- Where your information is publically available.

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). For more details on this and how to opt out of these, please see the [Cookies](#) section of this policy.

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

- Personal details, such as your name, address, telephone number, and email address;
- Supplier Contract details such as first and last name of person signing the contract, address, title, date of signature, e-mail, mobile number, IP-based location: Geo-location established based on IP-address.

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, and keep you updated with the progress of your order;
- To provide the relevant product or service to you. This includes other services not included in your agreement with us, services that use information about where you are, and to contact with you messages about changes to the products or services.

Billing and Customer Care

- To bill your company for using our products and services, or to take the appropriate amount of credit from your company.

Service messages

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

2. To improve our service

Improving and innovating our products and services

- We collect anonymous, de-identified or aggregate information in order to improve the service we offer to everyone.

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. 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 [Cookies](#) section. It explains how to control and opt out of cookies.
- 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 mathematically driven analysis techniques on 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 products and services on an anonymous or personal basis;

4. Profiling

Mergers and Acquisitions

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

Third parties that we work with

Where you've purchased Vodafone products and services using a supplier or 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.

Third party products and services that you buy through your Marketplace account

The supplier'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 currently keep your data in Frankfurt, Germany.

We may need to transfer your information to other Vodafone Group companies 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, or if you use our services and products while visiting countries outside this area.

If Vodafone sends your information to a country that is not in the EEA, we will make sure that your information is properly protected. We will always ensure that there is a proper legal agreement 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 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 your company tells us we need it, but no longer than 3 months after your company's contract with VPC ends or you leave your company's employment.

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.

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.

Your rights

Right to correct personal data

You have the right to have 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, you can log in to My Vodafone to update it (Login > “your name”.My profile) or contact our [Customer Services](#) 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. You can contact the [Customer Services](#) 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 manage Cookies and understand more about what they are:

Want to disable a cookie, or understand more about what these are? Check the [Cookies](#) 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 email us at Marketplace@vodafone.com.

How to lodge a complaint

If you want to contact us about any of your rights or if complain about how we use your information, email us at Marketplace@vodafone.com. We'll do our best to help but if you're still unhappy, you can contact the CNPD – their details are at www.cnpd.public.lu.

Right to restrict use of your data

If you feel data we hold on you is inaccurate or believe we shouldn't be processing your data, please contact our [Customer Services](#) team to discuss your rights. In certain circumstances you will have the right to ask us to restrict processing.

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 the site. 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. They simply 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, white paper 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

Cookies and you

To make a purchase online or sign up to services, 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, but you won't be able to buy online.

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 OS X



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>