



Privacy Policy

At Superloop, the protection of your personal information is a priority for us. Our Privacy Policy (this document) outlines how we collect, use, store and most importantly, how we protect your information, so please take the time to have read through and see what we are doing.

The Superloop group of companies, including Superloop Limited and its subsidiaries, is committed to protecting the privacy of your personal information. The entities of the Superloop group that are acting under this Privacy Policy are specified further in Part 1-5 of this Privacy Policy ("**Superloop**" or "**we**") and are acting as data controllers in accordance with Art. 4 No. 7 EU Regulation 2016/679 (**GDPR**). You can access the contact information of each relevant Superloop entity [here](#).

This policy explains how Superloop collects, uses, shares, holds and retains your personal information as required in the normal course and scope of Superloop's business or when required by law, whether you are a website visitor, employee, employment applicant, staff member of a Superloop customer, or other private individual whose personal information is affected by Superloop's services or activities (**Data Subject** or **you**). Personal information is any information relating to an identified or identifiable natural person as defined by privacy laws in each country that we operate^[1].

Part 1 of this policy relates to Superloop's customers and how we use the information that we collect from them, including any personal information and information transmitted via Superloop's network in the course of providing services according to a Superloop services agreement (**Services**). Part 2 relates specifically to recruitment and recruitment-related personal information. Part 3 applies to all visitors to the Superloop websites, including, where applicable, customers and job applicants. This also includes the use of cookies.

Part 4 sets out information on how Superloop protects personal information and on your rights as a data subject. Parts 4 and 5 will be relevant to all visitors to the Superloop websites.

Superloop may update this policy from time to time by posting the revised version on Superloop's website.

Part 1: Customers

Collection Data collected from our customers

In order to provide our customers with Services, or to perform a function related to providing our customers with Services, Superloop may need to collect and process certain data from our customers, which may include personal information relating to their staff or private individuals (**Collection Data**). This includes, in particular, the following types of data:

- customer contact details (such as the customer's name, address and contact phone number, in addition to the name, position and email address of members of staff who contact Superloop on behalf of the customer);

- customer credit card details;
- credit information about the customer;
- each customer's password and username for accessing Superloop's Services; and
- records of each customer's use of Services and that customer's communications with Superloop.

As Superloop may also collect personal information such as names and contact details from our customers' employees or authorised representatives, each customer must make sure that they have obtained the consent of such employees or authorised representatives to Superloop collecting and using such personal information in accordance with this Privacy Policy.

The Data Controller with regards to the Collection Data and the related Services is Superloop Limited or, if you are located in one of the countries with a local Superloop subsidiary, this local subsidiary is the data controller.

Providing the Collection Data is voluntary and based on the free will of the individual or entity providing the Collection Data. However, if a customer does not provide Superloop with the information Superloop needs, Superloop may not be able to provide that customer with the Services that customer wants or Superloop may be restricted in the way that Services can be supplied.

How Collection Data is collected

Superloop usually collects Collection Data when our customers interact directly with Superloop. For example, Superloop collects information when our customers and members of staff provide information to Superloop in person, by phone or email, or when customer details are entered on our websites. Superloop may also collect Collection Data, including from:

- anyone authorised to act on a customer's behalf;
- Superloop's employees, agents, contractors and suppliers;
- credit reporting bodies and credit providers;
- other telecommunication and information service providers; and
- public sources.

How Superloop uses Collection Data

Superloop uses Collection Data to the extent necessary to provide customers with Services and related support. In doing so, Superloop may use Collection Data for related purposes as required in the normal course and scope of Superloop's business, such as:

- processing a customer's application;
- carrying out checks for credit-worthiness;
- provisioning or connecting each customer's Services;
- dealing with customer enquiries and providing customer with customer support;
- managing each customer's Services, including account management, billing, processing payments and collecting debts;
- investigating complaints and carrying out dispute resolution;
- administering Superloop's agreement with each customer;
- product research and development, business planning and staff training;
- communicating with our customers about the Services; and
- informing our customer about special promotions that Superloop offers and which Superloop thinks may be of interest to customer, unless customer has requested Superloop not to do so. Superloop may tell customer about these services and offers via direct mail or electronic direct mail. You may opt-out of receiving direct marketing at any time by contacting Superloop at slcprivacy@superloop.com. If Superloop wants to inform its Customers about promotions and news of third parties, it will not do so without Customer's explicit prior consent.

Collecting and processing Collection Data for the purposes specified above is necessary to fulfil the Services towards the Customer[2], to protect Superloop's protected interests specified above[3], and to supply promotional communication to which the Customer has consented[4].

How Superloop shares Collection Data

Superloop may need to share Collection Data within the Superloop group of companies and with other organisations to the extent necessary for the supply of Services to our customers[5] or to protect Superloop's interests specified below[6]. However, Superloop will not share customer information with any third party for the purpose of marketing or for other purposes without the customer's consent, except to the extent necessary for providing the Services or to protect Superloop's protected interests as required or permitted by law. In particular, Superloop may disclose Collection Data to:

- Superloop's suppliers, resellers and agents so Superloop can supply the Services to the customer;
- Superloop's out-sourced service providers who perform functions and Services on Superloop's behalf, such as contact centre services, mailing functions or IT services;
- credit reporting bodies, credit providers or debt collection agencies if a customer does not meet its payment obligations;
- other telecommunications and information service providers for performing the Services;
- Superloop's marketing channels with which Superloop shares Superloop's marketing activities;

- Superloop's legal, accounting and financial advisers and within the Superloop group of companies;
- customer's authorised representatives;
- any person, with customer's consent;
- government, law enforcement and regulatory bodies where this is required for Superloop to comply with Superloop's legal obligations; or
- a specified recipient to facilitate a purchase or potential purchase of the whole or any part of Superloop's business.

The organisations that Superloop may share Collection Data with may be located in countries outside the European Union such as the United States, Australia, New Zealand, Singapore, Hong Kong, Sri Lanka, the Philippines or member states of the European Union such as the United Kingdom. In case the recipient is located in a country outside the European Union that does not have an adequate level of data protection from the perspective of EU data protection laws, Superloop will ensure that the recipient complies with a level of data protection that is considered to be adequate from the perspective of EU data protection laws. You can request insight in the respective documents at slcprivacy@superloop.com. You are aware that the recipient in third countries is still subject to different domestic laws and regulations regarding privacy and the protection of personal data which may vary from European standards.

How Superloop retains Collection Data

Superloop will store your personal information in Collection Data only as long as needed to satisfy the above purposes for which it was collected (normally after your Global Services Agreement expired) or as required or permitted by law.

Transmission Data

Apart from collecting and processing the Collection Data, Superloop will, while performing its Services to its customers, transmit data packages including personal data via its network (**Transmission Data**).

The types of Transmission Data Superloop collects

Superloop will deliver services and process all Transmission Data that is required to allow Customers to transmit information and data packages through Superloop's network. This may be in particular:

- technical data such as IP addresses, routing information, beginning and end of every transmission, transmitted data amount, other data required for installing or maintaining a communication channel between sender and recipient;
- content data, i.e. the content of the data packages sent through Superloop's network.

How Superloop uses Transmission Data

Superloop processes Transmission Data to the extent necessary to provide the Services to the Customer, in particular to build

up the connection between sender and recipient of data packages and transmit these data packages and (if applicable) to calculate fees for the use of the Services if these are connected to the amount of data transmitted.

Superloop may also use certain technical Transmission Data in order to detect and resolve malfunctions in Superloop's network and Services or in the case of factual indications for the unlawful use of the Services or the network to detect and prevent this unlawful use.

How Superloop shares Transmission Data

Superloop will share Transmission Data with other network operators and service providers to the extent necessary for fulfilling the data transmission requested by Customer and to cooperate with government, law enforcement and regulatory bodies where this is required for Superloop to comply with Superloop's legal obligations.

How Superloop retains Transmission Data

Superloop will delete all Transmission Data directly after the requested network connection has been terminated except where it is necessary to retain certain Transmission Data for billing purposes (where fees are connected to the amount of data transmitted) or for detecting and resolving malfunctions of or security incidents relating to the Services and Superloop's network or in the case of factual indications for the unlawful use of the Services or the network to detect and prevent this unlawful use. Superloop may also be obliged to retain certain Transmission Data by domestic laws.

Part 2: Recruitment

The types of personal information Superloop collects

In order to process and assess your job application, Superloop needs to collect and hold some personal information about you. The Data Controller in connection with this Part 2 is the relevant Superloop entity you apply to. The types of information Superloop may collect include:

- your contact details (such as your name, address and contact details);
- employment related information (such as your resume, employment details, qualifications, referees and other background checks, working rights checks and police clearances); and
- records of your communications with us.

If you provide us with personal information, this is based on your free decision and on your free will. However, if you don't provide us with the personal information Superloop needs, Superloop may not be able to assess or proceed with your job application.

Superloop will only process sensitive personal data which you provide to us (that is personal data relating to an individual's racial or ethnic origin, political opinions, religious or other

beliefs, political or trade union membership, philosophical beliefs, health, sexual orientation or criminal convictions).

How your personal information is collected and held

Superloop usually collects personal information about you when you interact directly with us. For example, Superloop collects your personal details when you provide information to us in person, by phone or email, or when you enter your personal details on Superloop's recruitment websites.

Superloop may also collect personal information about you indirectly, including from your referees, recruitment agencies and third parties Superloop engages to provide recruitment services on our behalf.

How Superloop uses your personal information

Superloop uses your personal information to:

- assess and process your job application;
- make a decision about whether to employ you;
- make decisions regarding your employment with us if you become an employee;
- file in our records for future offers of employment (if you separately consent to this retention);
- maintain and update our records; and
- deal with your enquiries.

Superloop will process your personal information for these purposes solely to the extent this is necessary for the application process and/or your subsequent employment with Superloop.

How Superloop shares your personal information

Superloop may need to share your personal information within the Superloop group of companies and with:

- recruitment agencies and other third parties Superloop engages to provide recruitment services on our behalf;
- your referees;
- third parties to conduct background and police checks;
- institutions who issued your qualifications;
- government, law enforcement and regulatory bodies where this is required for us to comply with our legal obligations or to protect our lawful interests; or
- a specified recipient to facilitate a purchase or potential purchase of our business.

Superloop will share your personal information with the above third parties only to the extent this is required for the application process or your subsequent employment with Superloop.

The organisations that Superloop may share your information with may be located in countries outside the European Union such as the United States, Australia, New Zealand, Singapore,

Hong Kong, Sri Lanka, the Philippines and member states of the European Union such as the United Kingdom. In case the recipient is located in a country outside the European Union that does not have an adequate level of data protection from the perspective of EU data protection laws, Superloop will ensure that the recipient complies with a level of data protection that is considered to be adequate from the perspective of EU data protection laws. You can request insight in the respective documents at slcprivacy@superloop.com. You are aware that the recipient in third countries is still subject to different domestic laws and regulations regarding privacy and the protection of personal data which may vary from European standards.

How Superloop retains your personal information

Superloop will delete your personal information directly after the application process is finished unless you are employed afterwards at Superloop or have consented to retention of your data for future employment offers.

Part 3: Visitors to the Superloop website

This section applies to all visitors to the website www.superloop.com or any other Superloop website (**Website**). Superloop Limited, the relevant Superloop entity which operates the Website, is the relevant data controller under this Part 3 of the Privacy Policy. Where you are a customer, Part 1 will apply in addition to this Part 3. Where you apply for a job with Superloop, Part 2 will apply in addition to this Part 3.

The types of personal information Superloop collects

Superloop may collect and process the following data about you:

- Information that you voluntarily provide to us via the Website: this may include your name, address, e-mail address and phone number and your financial and credit card information; and
- Information that Superloop automatically collects about you:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
 - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

How your personal information is collected and held

- Information that you provide to us: you may voluntarily provide us with information about you by filling in forms on the Website or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register with the Website, subscribe to our Services and when you report a problem with the Website.
- Information that Superloop automatically collects about you: With regard to each of your visits to the Website we may automatically collect information that is automatically transferred to us when you visit our Website as specified above.

How Superloop uses your personal information

Superloop will use this information:

- to enable you to use the Website and to provide our Services;
- to administer the Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve the Website to ensure that content is presented in the most effective manner for you and for your computer;
- as part of our efforts to keep the Website safe and secure; and
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.

Superloop will use the above information only to the extent required for Superloop's protected interests[7], or where this is necessary to provide requested Services to you[8].

How Superloop shares your personal information

We may share your personal information with suppliers and sub-contractors for the performance of our Services or where it is required to enable you to use our Website.

We may also share your pseudonymized technical information (e.g. IP addresses) with selected third parties including Superloop group companies including:

- business channels for advertising purposes;
- advertisers and advertising networks that require the data to select and serve relevant adverts to you and others; and
- analytics and search engine providers that assist us in the improvement and optimisation of our site.

Superloop will share your pseudonymized technical information with these third parties including its group companies only where such transfer is justified under Superloop's protected marketing and improvement interests[9].

You may object to such transfer of data by email to slcprivacy@superloop.com or by using a respective “do not track” tool in your web browser.

For the above purposes, Superloop will not share any directly identifying information (e.g. names, email addresses, etc.) without your explicit prior consent except where this is necessary to provide any Services requested by you or to process any of your requests.

Superloop may further disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if any Superloop group company or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets; or
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Superloop may share your information with parties that may be located in countries outside the European Union such as the United States, Australia, New Zealand, Singapore, Hong Kong, Sri Lanka the Philippines as well as member states of the European Union such as the United Kingdom. In case the recipient is located in a country outside the European Union that does not have an adequate level of data protection from the perspective of EU data protection laws, Superloop will ensure that the recipient complies with a level of data protection that is considered to be adequate from the perspective of EU data protection laws. You can request insight in the respective documents at slcprivacy@superloop.com. You are aware that the recipient in third countries is still subject to different domestic laws and regulations regarding privacy and the protection of personal data which may vary from European standards.

How Superloop stores your personal information

Superloop retains your personal information only to the extent this is required for the purpose it has been collected for and as required or permitted by law.

Part 4: Cookies

Cookies

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you give your respective consent upon the first visit of our Website.

Cookies help Superloop to collect information about visits to Superloop's websites for marketing and statistical purposes to improve the way Superloop interacts with customers and with its other Website users.

All accesses to pages on Superloop's websites are “logged”. The logged information contains such things as a list of the pages accessed and the sort of browser used. This information is used to check for attempts at “hacking”, or other fraudulent activity, to indicate missing pages or other web server problems. Superloop also uses it to provide general statistics such as the number of people viewing particular parts of the site.

Superloop uses cookies to authenticate customer access or to make sure customer is the same person over a given “session” time.

Superloop uses third party cookies (e.g. Google Analytics or Hubspot) to track how Superloop's Website is used. We may provide a limited amount of your information to these third parties.

You can find more information about the individual cookies, which data is processed by them, how we use them and the purposes for which we use them and how to opt-out from them [here](#).

You can usually remove or block cookies by using the settings in your browser, but this may affect your ability to use Superloop's websites.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

Part 5: Protection of and access to personal information held by superloop

How Superloop protects your personal information

Superloop treats your personal information as confidential. Superloop stores your personal information electronically and/or in hard copy form. Superloop takes a range of measures to protect the security of your personal information, including by storing electronic information in password-protected servers that are in restricted and monitored areas. Superloop does not store credit card details on Superloop's systems.

How to access and correct your personal information

Your personal information can be accessed via your Superloop account or by contacting Superloop at slcprivacy@superloop.com.

Superloop takes all reasonable steps to ensure that the personal information Superloop holds about you is accurate, complete and up-to-date. You can access and correct most of your personal information (such as your contact details) using your Superloop account. You can also contact Superloop

at slcprivacy@superloop.com if you wish to access or correct personal information that Superloop holds about you.

Your rights

You have the right to ask us not to process your personal data for marketing purposes.

You have the right to request information about the data we store^[10], to demand the correction of incorrect data^[11], and to demand its deletion^[12] or the blocking or restriction of the processing of data^[13]. You are also entitled to object to the processing of your data, provided the reason for the objection lies in your special situation and provided it is data we process to protect one of our protectable interests^[14].

You can exercise the above rights at any time by contacting us at slcprivacy@superloop.com.

Consent

If our data collection or processing is based on your consent, you may at any time freely withdraw your consent with effect for the future by email to slcprivacy@superloop.com.

Links to third party websites

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Contact Superloop

If you have an enquiry regarding privacy, or you wish to raise a complaint, you can contact the Privacy Officer by email at slcprivacy@superloop.com.

^[1] E.G. by Art. 4 (1) of the GDPR.

^[2] E.G. under Art. 6 para 1 lit b) of the GDPR

^[3] E.G. under Art. 6 para 1 lit f) of the GDPR.

^[4] E.G. under Art. 6 para 1 lit. a) of the GDPR.

^[5] E.G. under Art. 6 para 1 lit c) of the GDPR.

^[6] E.G. under Art. 6 para. 1 lit f) of the GDPR.

^[7] E.G: under Art. 6 para 1 lit f) of the GDPR.

^[8] E.G. under Art. 6 para 1 lit c) of the GDPR.

^[9] E.G. under Art. 6 para 1 lit f) of the GDPR.

^[10] E.G. under Art. 15 of the GDPR.

^[11] E.G. under Art. 16 of the GDPR.

^[12] E.G. under Art. 17 of the GDPR.

^[13] E.G. under Art. 18 of the GDPR.

^[14] E.G. under Art. 21 of the GDPR.