



Privacy Policy Statement

Gibtelecom has established a privacy policy as it is committed to protecting the personal information and privacy of its customers. The Company wants customers to feel safe about the privacy and security of their personal information whilst providing the best service possible.

This privacy policy has also been developed in order to explain the way in which the Company uses customers' personal data. The information will help customers decide whether or not to provide Gibtelecom with their personal information. It is also important to note that Gibtelecom is fully compliant with the Data Protection laws in Gibraltar.

Personal information is any information which identifies you as an individual, or is capable of doing so.

Please note that if you are visiting our websites or using any of our services, by continuing to do so, you indicate your agreement to our use of your personal information as set out in this privacy policy.

A copy of this Privacy Policy is also available from our website at www.gibtele.com

Who are we?

Gibtelecom is the leading communications provider to Gibraltar's residents and thriving business community. The Company is both aware of the needs of its customers and equally of the opportunities which arise as a result of Gibraltar's significant international financial services, maritime and e-gaming industries.

Gibtelecom provides customers with products and services matching those offered by leading telecommunications companies throughout the world. The Company's experienced and dedicated staff guarantee that customers receive a professional and customised service.

Gibtelecom is the first Gibraltar business to receive the "Recognised for Excellence" accreditation from the European Foundation for Quality Management, and is also an ISO 9001:2008 certified Company.

Gibtelecom is structured around three brands: GibWireline, Gibtel and GibConnect.

GibWireline encompasses the fixed line telephony services for the Rock's inhabitants. With almost 90 fixed lines per 100 population, services compare favourably with other countries and territories.

Gibtel provides both post-paid and pre-paid (Reload) mobile phone and data services, with a per capita penetration of over 100%. The Company's GSM, 2G and 3G networks offer full coverage of the Rock, and roaming agreements are in place with some 500 operators in over 165¹ countries.

GibConnect offers a variety of internet solutions, from individual lines and wi-fi access to business corporate links. Nearly 70% of households in Gibraltar have an ADSL connection. Gibtelecom also offers dedicated premium internet protocol (IP) bandwidth to businesses on demand, and can host their computer servers at one of the Company's data centres.

What is included in this privacy policy?

This privacy policy only applies to how Gibtelecom deals with your personal information.

What personal information do we gather about our customers and when is it gathered?

If you order, or register for, a service from us, we may ask you, amongst other things, for information such as details of your name, home or business address, contact phone numbers and email address. We may ask you to produce a valid ID card and/or utility bill to validate your details. We typically collect this information in person, but they can also be obtained by phone, in writing or through a website or email. We may also ask for, or obtain from you other relevant information about the service you're using or ordering. This will allow the Company to offer customers an enhanced service experience. Particularly we may use customers' personal information for marketing purposes including customer satisfaction surveys and any offers related to our goods and services that the Company may provide.

However, customers may choose not to receive marketing information from Gibtelecom if they so wish. Please see the section titled "How can I manage Gibtelecom's contact with me for marketing purposes?" below for more information.

By entering into any of our competitions or promotions, we may ask for information about our customers, which may be pointed out at the time entered. Gibtelecom may enquire about current products and services and request customers' feedback in improving services and perhaps suggestions on what other services and/or products customers would like us to adopt and/or introduce in the future.

When you (or someone using your phone) make a phone call, send a fax or connect to the internet, we keep a record of the details of that call (itemisation), including the number called so we can charge for it. Other phone service providers also give us information about calls being made over our network, if we need that information for connecting calls and billing purposes.

We may sometimes monitor and record calls about customer services. We do this as part of staff training and to improve how we look after our customers, including how we handle complaints.

¹ Information correct as of 30 November 2012

To help us to improve our website and the type of services we offer, Gibtelecom may gather information from visitors to our websites as well as monitor and record our communications with customers, including e-mails and phone conversations. Any information which we may gather in this way is then generally used for training and quality purposes, and to record details about the products and services customers order from us. We may share this information with our advertisers, and with other companies that offer their services on our websites.

In order to provide you with a better customer experience, for instance for troubleshooting and assistance purposes, we may need to obtain information about your use of our products and services. This may include, such as in the case of broadband services, and in line with global standard practice, the need to identify any devices communicating with Gibtelecom equipment. The information obtained in this way will include the host name and/or MAC address that is being publicly broadcast by these devices. We also need this to maintain the integrity and smooth running of our network(s).

How we use your personal information

We use information about you to do the following:

- Process the orders you place with us.
- Help provide services to you, including customer assistance and troubleshooting services.
- Charge for the service(s) we provide you. Where necessary, we may give your information to other people or organisations who we instruct to collect payments for us.
- Publish your details in our phone directories (unless you have expressly asked your details not to be published), provide directory enquiry services, as appropriate. We have to give directory information about our customers to other phone operators and service providers. We also have to pass these details to other companies who want to provide a directory service that is available to the public. We don't give ex-directory numbers to other companies.
- Communicate with you about how to use our services.
- Let you know about any changes to our services.
- Check or confirm your identity if you call us, particularly about changes to your service or requests for billing information.
- Market our own products and services, including carrying out market research, customer satisfaction surveys and analyses on our products and services and future developments.
- Allow checks to be carried out so we can find out whether broadband internet access is available on your phone line.
- In cooperation with local law enforcement agencies (where necessary), prevent and detect criminal activity, fraud and misuse of or damage to our network, and prosecute or sue those responsible

How can I manage Gibtelecom's contact with me for marketing purposes?

If you do not wish to be contacted by Gibtelecom or any of its contracted agents for marketing purposes then please tell us in writing at the following address:

Gibtelecom
Customer Services Centre
15/21 John Mackintosh Square
PO Box 929
Gibraltar

or any other address we give you.

What personal information do we collect from our customers from other companies and organisations?

We receive information from other service providers about their customers to enable us to enter their details (together with our own customer's information) in telephone directories. We also make telephone numbers available on directory enquiry services unless customers choose to have their number on ex-directory. Please note that Gibtelecom is not responsible for the accuracy of the information provided to us from alternative service providers.

Who we can give your information to?

We sometimes use other companies to provide some of our services or to provide services to us. So they can do this, we may need to let them process your personal information.

When we do so, these companies:

- must act in line with the instructions we give them;
- may only do things that we've entitled to; and
- must keep to the Data Protection Act 2004 and so keep the information secure.

We may provide information (in response to requests made properly) to prevent and detect crime, and to prosecute offenders. We may also provide information to protect national security. In all cases, we'll do this in line with the Data Protection Act 2004. We also provide information when we have to do so by law (for example, under a court order) or in response to demands that have been made properly under legal powers.

For how long does Gibtelecom keep personal information?

The time period for which we keep information will depend on what the information is used for. Legal requirements may require the Company to store data for a certain time period. Normally, the Company will not retain the information for longer than is necessary for the purposes we collected or processed the information.

How can customers find out what personal information Gibtelecom holds about them?

If you want specific information then you must contact our Customer Services helpdesk on 20052200. You should note that if you ask for a full subject access request then we may ask for a small fee to be paid to cover our administrative expenses. We may also ask you for certain information so we can process your request. Further information on what data can be requested is available from the data protection commissioner's website at www.gra.gi.

How can I change the personal information Gibtelecom holds about me?

If the information we hold about you is inaccurate, please let us know, by contacting us in writing at the address above and we will make the necessary changes and confirm that these have been made.

How do our customers find out about changes to our privacy policy?

We may change our privacy policy from time to time. New policies will be published on our website and made available at our customer services centre.

How does Gibtelecom protect customers' personal information?

At Gibtelecom we feel very strongly about protecting and safeguarding our customers' personal information. Therefore we have certain security measures in place to ensure the information is secure in our hands and no unauthorised or unlawful disclosure, accidental or unlawful damage or loss takes place. Only certain authorised employees at Gibtelecom have access to such information.