

# Privacy & Security

## Safe purchase: Distance Selling Act

All products offered by Gomibo have a cooling-off period of **31 days**. This means that the product can be returned within 31 days without giving any reason. In providing this service, Gomibo extends the statutory 14 day cooling-off period to 31 days! You can read all the terms and conditions for exchanging and cancelling on [this page](#).

## Privacy and security

*Version: 3 November 2023*

Your privacy and the safe processing of your personal data is very important to us. You of course want to order your mobile phone, tablet, and accessories without worrying about privacy and online security. Therefore, we would like to show you how we handle your personal data in compliance with the General Data Protection Regulation (GDPR).

## Who is responsible for your data?

Gomibo, part of MobielWerkt BV, is responsible for all personal data you leave with us. These are our details:

Business address:	Waagstraat 1, 9712 JX Groningen, The Netherlands
Postal address:	Postbus 3023, 9701 DA Groningen, The Netherlands
Registration number with the Netherlands Chamber of Commerce (KvK)	02093714
VAT number	NL819148003B01

If you have any questions about privacy and security, you can always contact team privacy or the Data Protection Officer (FG) at [privacy@gomibo.com](mailto:privacy@gomibo.com). The Data Protection Officer (FG) of Gomibo is officially registered with the Dutch Personal Data Authority (AP).

## What data do we store and why?

Gomibo collects personal data in various ways. Which exact data is collected depends on what you do on our website: do you visit the website without placing an order or do you order something from us? What you order also has an influence on this. We would like to explain which of your data we process.

### Order details

Of course, we need to know who you are when you place an order with us. That way we can help you in the best possible way. That's why we ask for your gender, date of birth, initials, and surname. For the delivery of your order, we also need your address. Together with your initials, surname, address details, order number, telephone number, and track & trace code, we will send this to the package delivery company.

We will send you updates on your order via email, and sometimes via text message. We will need your email address and your phone number for this. We will also send you invoices and information about the products you have purchased. After you've placed your order, we'll sometimes ask you what you think of us, usually by email, and sometimes by phone. With your feedback we can continue to improve!

### Payment

Paying for your order is always conducted in a secure payment environment. Linking your payment to your order is also conducted in a secure environment. In case of a credit card payment, we send your details from our secure payment environment directly to the payment processors.

## **Phone contracts\***

When you apply for a contract at Gomibo, we need your identity to verify who you are. In order to do this, we need an identity document from you. We have made agreements with the Dutch government to process this personal data, so we can prevent identity fraud and track down fraudsters and criminals more quickly.

To upload your proof of identity, we use special software which we have developed at Gomibo. This means that your passport photo(s), BSN number, and the Machine Readable Zone (MRZ) on the card are immediately masked by the software. We do not need this information from you. We do process your name, surname, date of birth, place of birth, period of validity of your document, type of proof of identity, and document number.

If you purchase a contract from us in-store, or if you do not use our "No Fuss contract", we will request a copy of your bank card. The card number, IBAN number, and name of the card holder must be clearly visible in order to verify that the bank account really belongs to you. This prevents someone else from ordering a contract that is paid from your account. You can mask certain details, as long as the necessary information remains visible.

If you apply for a contract through Gomibo, we may conduct a risk assessment to support your application in order to combat financial and identity fraud.

\*Please note: it is not yet possible to buy a contract from Gomibo.ro.

## **Transfer your phone number**

Did you choose to transfer your phone number to another provider? Then we need the name of your current provider, your phone number, and your connection type. Sometimes we also need your SIM card number or customer number. With this we ensure that your phone number is transferred with you.

## **Income and burden test (ILT)**

If you have chosen a device bundle that falls under the relevant credit legislation, we may need your details for an income and income and burden test (ILT). This way we know for sure that you have chosen a contract that fits your financial situation. The income and burden test (ILT) must be carried out in accordance with the relevant credit legislation. For this, we may need to process your family composition, net monthly income, and housing costs. Under no circumstances do you have to send us your payslip or other evidence for this purpose!

## **Details of your products**

When you buy a product from us, we store its IMEI and EAN number. The IMEI number is a unique code which is linked to your specific product. The EAN number is a number that is linked to the type of product that you have bought from us. This way, we can be sure that you actually get what you ordered from us.

With a contract, we store your SIM card number. This way, we know for sure you will receive the correct SIM card, and that the correct contract will be placed on the correct SIM card. This way we can always provide the right service, for example if you have requested to transfer your number.

## **Orders with other services**

Did you choose to place an order at Gomibo with specific services, such as an insurance, or a subscription at a streaming service? If so, depending on the service provider, we might need more additional data from you, such as an IBAN-number, or an accepted direct debit for deducting the premium from your bank account, or to charge the periodical subscription costs by the service provider.

## **Collecting orders in our store**

Do you want to collect an order in our store? If so, we will always ask a few verification questions for verification purposes. As a proof for collecting your package in the store, we always need a copy of your proof of identity, in order to confirm your identity. For making the copy, we will use the software that was created by Gomibo. This software will automatically mask the photo(s), BSN-number, and the Machine Readable Zone (MRZ) that are on your

proof of identity. We do not need this information from you. The other information on your document is necessary to confirm that we have handed over the correct package.

## Communication

We like to keep you informed by mail, email, phone, or text message when you place an order with us. Sometimes we will send you messages about tips and tricks, security updates, review requests, personalised vouchers, discount offers, information about the end of your contract, or other relevant information about your order or personal interests. You can also use our website or app to run a contract upgrade check. To do so, we will ask you for your mobile phone number, postal code, house number, email, date of birth, and type of contract. This way, we can keep you informed via service messages of when you can upgrade your contract or apply for a new one. As a customer, you will automatically receive all communications from Gomibo, except for our newsletter. You will only receive our newsletter if you have given your explicit consent. You can easily manage your communication preferences via your [Gomibo account](#).

We use the following communication preferences:

### **Order updates (always activated)**

*You will receive information about your order, customer account, store appointment, payment, and invoices.*

### **Service messages**

*You will occasionally receive information about your previous orders, like tips on how to use it, updates, notifications, and upgrade information.*

### **Personalised discounts, offers, tips, and inspiration**

*You will only receive information specifically related to your previous order and preferences, such as personalised discounts, giveaways, and personalised offers.*

### **Review requests**

*You will receive an invitation to review products or share your experience of our service after placing an order or contacting Gomibo.*

### **Newsletter**

*You will regularly receive offers, tips, news, and useful information about products and services.*

## Newsletter

You will receive our newsletter by email. Of course you will only receive it if you have given us your explicit permission to do so. Would you like to stop receiving our newsletter? You can unsubscribe by clicking on the unsubscribe button at the bottom of the newsletter or by changing your communication preferences in your [Gomibo account](#).

## Offline and online recognition

For your and our safety, we record and store camera images in our stores. Online, this is different. If you use the Gomibo app, we store the usage data of your phone, such as the number of call minutes, text messages, and MB's, so we can give you the best phone advice. We also use tracking pixels. This enables us to offer you a personalised shopping experience, tailored to your preferences.

When you visit our website, we store your IP address, click data, and cookies. You can easily manage your cookie preferences in your internet browser. You can manage the cookie preferences of the main web browsers via the links below:

[Chrome Browser](#)

[Internet Explorer](#)

[Mozilla Firefox](#)

[Safari](#)

### Technically necessary cookies

When you visit our website or app, we only use technically necessary cookies to make our website and app more user-friendly, effective, and secure. By using these cookies, we can ensure the optimal and user-friendly functioning of our website and app.

### Google Analytics

For the analysis of our website and apps, we use the web analytics service Google Analytics from Google Ireland Limited. Amongst other things, we collect your IP address, the date and time of your visit to our website or app, click path, information about your browser, information about your device, the pages visited, affiliate links, location data, and purchasing activities. We use this information to continuously improve our website and app to ensure the best user experience. Google Analytics uses cookies, the web memory in your browser and tracking pixels to collect this information. All data collected is stored by Google in the USA. By doing so, Google relies on standard contractual clauses as appropriate guarantees for the protection of personal data.

### Google Ads Conversion-tracking

For online advertising and measuring conversion on our website and in our app, we use the Google Ads service provided by Google Ireland Limited. When you click on our advertisement in your web browser provided by Google, a conversion measurement cookie is automatically stored in your internet browser. These cookies are stored for a limited time and do not contain any personal data. By placing a cookie, both us and Google will know whether you have clicked on an advertisement, and we will be able to address you personally and specifically on our website and in our app based on advertisements. We also use cookies with the remarketing or similar targeting function of Google Ireland Limited. We use these cookies to analyse your behaviour on our website and interest in certain products or services so that we can display personalised advertisements. No personal data is processed with this targeting functionality. This data may be processed by Google in the United States. You can find more information in the privacy statement of Google and Google Ads.

### Google Plug-ins

On some sections of our website and app, we use the GoogleMaps and Youtube plug-ins provided by Google Ireland Limited. We use GoogleMaps to show the location of our shops, for example, so that you can easily find our store on the main street. We use Youtube in an iFrame on our website and apps to show informative videos about products and tips and tricks. Google may set cookies for both services and the data may be transferred to the USA. You can find more information in the privacy statement of Google and Youtube.

## **Payment service**

If you pay for your order with the payment service PayPal, then the PayPal privacy statement also applies to your order. You can find PayPal's privacy statement here: [Privacy statement PayPal](#).

## **Customer service**

When you contact our customer service, we want to help you as good as we can. That is why we save the email conversations you have with our customer service agents. It is also possible that phone conversations are recorded for training purposes. We always tell you this before the phone call. Sometimes we will ask you to provide us with specific personal details during an email or phone call. We ask these questions to verify that you are the customer that is associated with the order you are asking about. We will also make notes of our contact, so that we know exactly what was discussed if you contact us again.

## **Return & repairs**

Would you like to exchange or cancel, or do you have a defective product? We'd love to help! Before you send your device back, it is important to create a back-up and reset it to its factory settings. This is necessary in order to process it, and it also deletes any personal data on your device.

You are responsible for resetting your device. If you do not do this, or if it fails, all possible data will still be deleted from your device. In addition, you then agree that your data may be forwarded to, for example, a repair service provider.

Repairs are carried out by specialised repair companies. Is your device, or a part of it, replaced by a new one? Your old phone or device is carefully destroyed or recycled by the repair company.

## How do we share and store your personal data?

### Sharing of personal data

Your privacy is very important to us. Therefore, we only share certain or specific personal details with partners and third parties if this is really necessary, for example because it is required for your order. We never sell your details to third parties as is.

In order to properly regulate this, we have concluded a processing agreement with all parties with whom we share your personal details. This is a contract in which clear agreements are made about who is responsible for which data. There are various parties with whom we share your personal details, to ensure that your order arrives within 24 hours and we can offer you the best service:

- The provider;
- The processor of payment information;
- The package delivery company;
- The processor of communication data (such as telephony, SMS, and email);
- (Online) marketing channels;
- Administration processors;
- If applicable: the insurer and authorised agent;
- If applicable: the repair company;
- If applicable: the manufacturer of an appliance;
- If applicable: the risk assessor;
- If applicable: the identity data processor.
- If applicable: service providers of specific services that you have ordered at Gomibo.

Most parties are based in the European Union and are subject to the General Data Protection Regulation. In some cases, we also share certain details with partners who are based in the United States of America (USA) and who previously actively participated in the European-American 'Privacy Shield'. We have made strict agreements with these parties regarding the processing of personal data. We have recorded these agreements in standard contractual clauses (SCC).

### Retention of personal data

We will not keep your personal data longer than necessary. In some cases we need your personal data to detect fraud or illegal activities. In this case, we have a legal obligation to share this personal data with the police, the judiciary, or the public prosecutor when we receive a request. Besides that, we have a tax responsibility to the tax authorities. This means that we store your personal data for legitimate, legal, and commercial reasons, in order to deliver the products and services you have ordered, and to provide you with a service that is as safe and reliable as possible.

Would you like us to change your privacy preferences? Then contact the privacy team: [privacy@gomibo.com](mailto:privacy@gomibo.com).

### Profiling and automatic decisions

If you place an order with us, we might use public data sources and databases to verify your identity, and verify your shopping behaviour. Based on all of that information, an automatic decision might be made about your order, application for a phone contract, or any other additional service.

### Securing your personal data

We always ensure the best information security. Our website has a secure connection (recognisable by 'https' in the address bar) and SSL certificates. Additionally, we always use the best security software, so that your personal data is stored as securely as possible. This is done in ISO 27001 certified data centres on our own servers in the Netherlands.

We check and monitor all our employees, specifically for who has access to which personal data, and we keep a record of who has seen which personal data. This way we always know what happens to your personal data. Moreover, all employees of Gomibo have a Certificate of Conduct (VOG), so we can be sure that everyone handles your personal data safely.

### **Your rights concerning your data**

As a customer of Gomibo you may always submit a request to inspect, correct, transfer, or remove your personal data from our database. You can do this at our [customer service](#) or by contacting the privacy team directly at [privacy@gomibo.com](mailto:privacy@gomibo.com). We ask you to verify that it is you, so that we do not simply share your details with someone else.

### **Deleting your data**

Of course you can delete your data with us, if you want to. Our privacy specialists will process your request within 15 business days.

Did you order a contract through Gomibo? Then we cannot remove your personal data, because you have entered into a fixed term contract with one of the telecom providers via Gomibo. After the expiry of your contract with your provider, you can request Gomibo to remove your personal data.

Would you like to stop receiving our newsletter? Then you can easily unsubscribe at the bottom of the newsletter, or by logging into your [Gomibo account](#) and changing your communication preferences.

### **Questions or comments**

If you have any questions or comments about privacy and security, you can always contact our [customer service](#). For further questions or complaints you can contact the [Authority of Personal Data](#) or the [National Ombudsman](#).