

PRIVACY POLICY AND INFORMATION ON COOKIES

This privacy policy governs the collection, storage and use of personal information (meaning any information about you which is personally identifiable namely: your name, billing/payment card address, delivery address, telephone number, email address, IP address, browser agent and browser language) (referred to throughout this policy as "**Personal Information**") collected via the website www.vmall.eu/uk (the "**Website**"). It provides you with details about the Personal Information collected from you, how it is used and your rights with respect to the Personal Information held about you.

Any reference to "**you**" or "**your**", means you as a user of the Website. Any reference to "**we**", "**us**", "**our**" is to Expansys UK Limited.

We are registered under the Data Protection Act 1998 and have notified the Information Commissioner's Office about our data processing activities under notification number Z5528632.

The Website is operated by us under license from Huawei Technologies (Netherlands) BV ("**Huawei**"). We are the data controller with respect to all personal data collected from you on the Website, except as indicated under the heading "Marketing" below. Huawei may only use your Personal Information in accordance with this privacy policy if you have given your explicit consent.

If you have questions or concerns regarding this privacy policy, you should contact us by email at compliance@brandpath.com. If you do not receive acknowledgment of your enquiry or your enquiry is not satisfactorily addressed, they should then contact support-uk@vmall.eu or call 0800 048 8994.

Information Collection and Use

Personal Information is collected at several different points on the Website, including on the order form for products and/or services or when you register for an account (see below). You must provide certain information (such as name, address, email, telephone number, and delivery address) and financial information (such as credit card number, expiry date, CVC number) when placing an order. In case of problems processing an order, the Personal Information may be used by us to contact you. We may also keep copies of correspondence with you.

We may use Personal Information to help provide you with a more personalised service which is tailored to suit your needs.

The personal data collected by us is as follows:

- name
- billing/payment card address
- delivery address
- telephone number
- email address
- IP address
- browser agent
- browser language

Additionally we are collecting various technical data that must be considered personal data as well, thus we are able to refer it to you in most cases. The mere technical data we are collecting during your visit of the Website is named and explained below.

Your Personal Information may be used by us to:

- marketing purpose where accepted during order check-out or sign up for My Account;
- process any orders you may make and/or provide goods and services;
- monitor, develop and improve the Website, services and your experience;
- ensure that content from the Website is presented in the most effective manner for you and your computer;
- carry out our obligations arising from any contracts entered into between you and us;
- allow you to participate in any interactive features of the Website, when you choose to do so;
- keep the Website safe and secure;
- process and deal with any complaints or enquiries made by or about you;
- investigate any suspected breach of the Terms relating to your use of the Website or the breach of other terms and conditions otherwise relating to you and to monitor compliance including by way of checking postings or submissions to the Website and using keyword triggers to investigate usage that may be inappropriate; and/or
- where you are a prize winner, administer the competition prize and to publish or otherwise make available a list of prize winners.

Occasionally we may perform anti-fraud, credit or security checks and receive information about you from Gatekeeper, Fianet or 3DS Secure which will be added to the Personal Information already held about you in order to help provide the goods and services and assess credit, fraud or security risks. We will not do so, if you have not given your explicit consent.

My Account

If you choose to setup an account via the Website you will become a member of www.vmall.eu/uk (a "Member").

The same privacy policy will apply, however, we may ask for additional information, including an additional delivery address and/or the details for the debit or credit card that you wish to use for future purchases.

By setting up an account on the Website, you will be sent a welcome email to verify your password and username, and you consent to receiving emails from us about our products, services, special deals and a newsletter.

Members can opt-out of these emails at the time of registration, or by emailing support-uk@vmall.eu with the word "unsubscribe" in the subject line.

Cookies and Other Such Devices

We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer or other similar devices. Cookies contain a small amount of information that is transferred to your computer's hard drive. They help us to improve the Website and to deliver a better and more personalised service. On the following website you can inquire and check which third-party cookies are currently installed on your device/your Browser for the purpose of tracking and behavioural online marketing:

<http://www.youronlinechoices.com/uk/your-ad-choice>

By using this Website you can also forbid the collection and usage of data for advertising purposes by certain third-parties with effect for the future by a simple click.

Cookies that are strictly necessary for the operation of the Website:

Some of the cookies we use are essential for parts of the Website to operate and are already set. These are strictly necessary for the sale of products requested by you and without them the Website cannot operate as intended. As an example, we may use cookies to make use of e-billing services or to store products in an electronic shopping basket whilst browsing different pages of the Website or between visits to the Website.

Other uses of cookies (where you have consented to such use):

Where you consent, we also use cookies and other such devices to compile anonymous, aggregated statistics that allow us to understand how users use the Website and to help us improve the structure of the Website. Cookies and other such devices are used to understand who has seen which pages and advertisements on the Website, to determine how frequently particular such pages and advertisements are visited, to determine the most popular areas of the Website and generally in order to monitor usage of the Website.

Where you consent to us doing so, cookies and other such devices may be used to:

- allow you to carry information across pages of the Website and avoid having to re-enter information;
- within registration, allow you to access stored information;
- help recognise you as a unique visitor when you return to the Website and to tailor content or advertisements to match your preferred interests or to avoid showing you the same adverts repeatedly;
- help personalise content for you, greet you by name and remember your preferences (for example, your choice of language or region);
- speed up searches; and/or
- within research surveys, ensure you are not invited to complete a questionnaire too often or after you have already done so.

Details of these cookies are set out in the table below:

Cookie Name	Purpose	Used For
Expansys	Shopping Cart	Essential Function
msuuid?	Session	Essential Function
__utma, __utmb, __utmc, __utm, __utmz, __utmx, __utmxx, __utmz	These cookies enable the function of Google Analytics which tracks your activity and helps us to improve the website and your experience.	Experience

Other cookies outside of our control:

Like many other organisations, we use **Google Analytics**, a web analytics service provided by Google, Inc. ("Google"). Web analytics services set a number on behalf of the operator of this Website of cookies in order to evaluate your use of the Website and enable us to carry out actions including (but not limited to):

- Tracking the number of visitors to the Website.
- Monitoring the number of users on the Website at any given time.
- Analysing popular content on the Website.

The data that Google Analytics collects cannot be merged with other Google data.

The information generated by the Google Analytics cookie about your use of this website will not be directly transferred to a Google server in the US and stored there, since we have the IP anonymization on Google Analytics enabled. Your IP address is therefore shortened by Google within the member states of the European Union or other parties to the Agreement on the European Economic Area first. Only in exceptional cases the full IP address is transmitted to a Google server in the US and shortened there. You can prevent the transfer of data generated by the cookie and relating to your usage of the website (incl. Your IP address) to Google and the processing of these data by Google, by downloading and installing the relevant browser plugin available at:

<http://tools.google.com/dlpage/gaoptout?hl=en>

Via Google Analytics a pseudonymized user profile is created on the basis of your behaviour on our website. The data collected here are not merged with other data about you and not shared with third parties. Such data is also not transferred outside of the EU.

You can acquire further information about Google Analytics here:

<http://www.google.com/intl/en/privacypolicy.html>

IP Address

Google Analytics and other tools mentioned in this privacy policy are using your IP Address. The IP address is a worldwide unique string of numbers which is assigned to you by your internet service provider. In its currently most common form (IPv4), the IP address is composed of four dot-separated number blocks. In most cases you will not have a permanent IP address, which will only be temporarily assigned to you by your internet service provider (so-called "dynamic IP address"). In a permanently assigned IP addresses (so-called "static IP address") a clear allocation of user data is possible more easily, as the address is not changing.

Browser settings:

Most internet browsers are automatically set up to accept cookies, but you can set your browser to refuse a cookie or ask your browser to show you where a cookie has been set up. Certain services are only activated by the presence of a cookie and, if you choose to refuse cookies, particular features of this Website may not be available to you.

Firefox

In order to delete cookies choose -> Options -> Privacy -> and remove individual cookies, or remove your profile.

In Order to to block cookies choose -> Options -> Privacy -> select History under "Use custom settings for" -> "Always use the private mode" and remove the checkmark from "Cookies Creating visited pages".

Internet Explorer

In order to delete cookies choose -> Internet Options -> General -> Delete -> Cookies> Delete.

In Order to to block cookies choose -> Internet Options -> Privacy -> move the slider all the way to the top. In this way, all cookies are blocked. -> Click OK.

Google Chrome

In order to delete cookies choose -> Clear browsing data - -> Tools> Delete Cookies and other site data -> Clear browsing data.

In order to to block cookies choose-> Settings -> Show Advanced Options -> Content Settings -> "storing data for all sites block" and "Cookies and website data block from advertising providers" -> Ok

Safari

In order to delete cookies choose -> Settings -> Security -> click "Show Cookies". You can optionally delete cookies from a domain or remove all cookies.

In order to to block cookies choose -> Settings -> Security -> click "accept cookies" on "Never".

Device Fingerprint

To identify the device you are using to visit the Website, we use a technique called "device fingerprint". Fingerprints can be used to fully or partially identify Your device, even when cookies are turned off.

Log Files

Like most standard website servers, we use log files. This includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks to analyse trends, administer the site, track user's movement in the aggregate, and gather broad demographic information for aggregate use. We use a tracking utility called Webtrends that uses log files to analyse user movement.

Children

We do not knowingly collect information from any unsupervised child under the age of 18. If you are under the age of 18, you may not use this Website unless you have the consent of, and are supervised by, a parent or guardian.

Communications from the Website

Marketing emails and newsletters

Where and only where requested by you we will:

- send you and keep you updated with information by email, telephone or mail about existing and new services and special offers from Huawei; and/or
- send you information by e-mail, telephone or mail about related products or services of selected third parties that may be of interest to you.

If you agree to us providing you with marketing information, you can always opt-out at a later date. To opt-out of receiving any such communications, you can use the facility contained in any such communication.

If you agree to us providing you with marketing information, we may share your Personal Information with Huawei in order for Huawei to provide you with the marketing information described above. Unless otherwise agreed in a new privacy policy, Huawei will only be entitled to process your Personal Information in accordance with this Privacy Policy.

Service Announcements

Sometimes it may be necessary to email you about a service related issue. For instance, if the service is temporarily suspended for maintenance. Generally, you may not opt-out of these communications, but you may deactivate your account to stop receiving them. These communications are not intended to be promotional in nature.

Customer Service

We will contact you to provide services you request and in regards to issues relating to your account. Communication will be via email or phone.

Sharing

Legal Disclaimer

We may need to disclose Personal Information to the police, regulatory bodies or legal advisers in connection with any alleged criminal offence or suspected breach of the terms and conditions applicable to your use of our Website and/or the breach of other terms and conditions otherwise relating to you or otherwise when required by law or if necessary to comply with legal proceedings, a court order or legal process served on the Website. We also release account and other Personal Information when we believe release is appropriate to enforce or apply terms and conditions and other agreements; or protect our rights, property, or safety and the rights, property or safety of Huawei, other users of the Website, or others.

Aggregate Information (non-personally identifiable)

We may share aggregated demographic information with our partners, advertisers and Huawei. For example, we may pass details to our suppliers of the number of users looking at or purchasing the Products of our suppliers, or the number of click-throughs from our suppliers' websites. This is not linked to any personally identifiable information.

Third Party Intermediaries

For the purpose of credit/debit card authorisation, we will pass your card details to payment gateway/merchant provider to facilitate our chosen bank taking payments from such card.

For the purpose of delivering your Order or parcel we will pass your name and address to a courier. These companies do not retain, share, store or use personally identifiable information for any secondary purposes.

Credit reference agencies

We may provide your name and address to credit reference agencies for the purposes of assessing fraud, credit and/or security risks with respect to an order. Credit reference agencies operate within the European Union. Services are provided by Fianet, 3DS Secure, Gatekeeper.

Business Transitions

In the event that we go through a business transition, such as a merger, being acquired by another company, or selling all or a portion of its assets (a **"Business Transition"**), your Personal Information may be disclosed – in a totally anonymized way - to the prospective seller or buyer of such business or assets; and, in most instances, will be part of the business or assets transferred. You will be notified via a prominent notice on the Website for at least 30 days prior to the Business Transition taking place.

Termination of our arrangements with Huawei

Where we cease to operate the Website on behalf of Huawei, Huawei may require us to provide them with a copy of your Personal Information so that it can continue to operate the Website.

Where we cease to operate the Website on behalf of Huawei and you have opted in to receiving marketing information, Huawei may require us to provide them with a copy of your Personal Information in order to provide you with the information described under the heading “Marketing emails and newsletters above”.

Unless otherwise agreed in a new privacy policy, Huawei will only be entitled to process your Personal Information for the same purposes as set out in this Privacy Policy.

Storage

The data collected from you will be stored by us on servers in the European Economic Area.

The payment data collected from you will be transferred to Braintree, a division of PayPal Inc (“Braintree”), and stored on servers in the United States of America. Any transfer, use and processing of your Personal Information by Braintree will be in accordance with applicable data protection and data privacy laws.

Links

The Website contains links to other sites. Please be aware that we are not responsible for the privacy practices of such other sites. This privacy policy applies solely to information collected by this Website.

Surveys & Contests

Occasionally we may request information from you via surveys or contests. Participation in these surveys or contests is completely voluntary and you therefore have a choice whether or not to disclose this information. The requested information typically includes contact information (such as name and shipping address) and demographic information (such as postcode). Contact information will be used to notify the winners and award prizes and may be shared with the contest/survey sponsors. Survey information will be used for purposes of monitoring or improving the use and satisfaction of this Website.

Security

We take all reasonable precautions to protect Personal Information. When you submit sensitive information via the Website, your personal data is protected both online and off-line.

When you provide sensitive information (such as credit card number) via the registration/Order form, your information is encrypted and is protected with industry-standard technology to allow for the encryption of:

- potentially sensitive information such as your name and address; and
- critically-sensitive information like your credit card number.

While on a secure page, such as the Order form, the lock icon on the bottom of web becomes locked, as opposed to un-locked, or open, when you are visiting other parts of the Website.

We also take steps to protect your Personal Information off-line. So for example, access to Personal Information obtained by us is restricted and only employees who need the information to perform a specific job (for example, Web Sales or Dispatch teams) are granted access to it. The servers that store Personal Information are in a secure environment in a locked facility.

If you have any questions about the security at the Website, you can send an email to compliance@brandpath.com.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website; our liability in this respect is limited according to Section 4.1 of our [Website Terms and Conditions](#). We are not liable for the device and the browser used by you to visit the Website. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Information from Third Parties

In order for us to fulfil our obligation to you it is necessary for your Personal Information to be supplemented with information from third party sources. The external sources do not contain personal information of you. We will not transfer the aggregated data unless you have given your consent.

Access to your Information and Amending your Information

You have the right to request a copy of the information that we hold about. If you would like a copy of some or all of your personal information, please send an email to compliance@brandpath.com.

If your information changes (such as postcode, phone, email or postal address), or if you no longer require the services offered via the Website, you can correct, update your Personal Information or delete/deactivate your account. This can be done by emailing Customer Support at support-uk@vmail.eu, by contacting us by telephone on 0800 048 8994 or postal mail at Network House, Globe Park, Marlow, Buckinghamshire, SL7 1EY, UK.

Notification of Changes

If we decide to change our privacy policy, those changes will be posted to this privacy policy, the homepage, and other places we deem appropriate. If we revise parts of that privacy policy that are subject to your consent, the new parts will only be valid if you have consented, to them, actively.

This privacy policy was last updated on 27/07/2015.