

Privacy Policy

This Privacy Policy describes policies and practices of China Mobile International Limited (“CMI”) and our subsidiary, China Mobile International (UK) Limited (“CMIUK”), in the collection, use, disclosure and transmission of your personal information in relation to below products and services:

- (i) CMLink pay-as-you-go SIM cards; and
 - (ii) (ii) CMLink Data Growth Packs
- (collectively “CMLink Products”)

CMI and CMIUK (“we”, “us” or “our”) strive to comply with applicable data protection and privacy legislation and regulations (“Applicable Laws”), that may include, without limitation, the Personal Data (Privacy) Ordinance (Cap. 486) of the Laws of Hong Kong Special Administrative Region (the “PDPO”) and the Data Protection Act 2018 of United Kingdom (the “DPA”) and the Regulation (EU) 2016/679 (General Data Protection Regulation) (“GDPR”). CMIUK is registered as a data controller with the Information Commissioner’s Office of United Kingdom. This website is operated by CMI. To the maximum extent permitted by Applicable Laws, and subject to your valid consent where required by Applicable Laws, your continued use of this website and/or CMLink Products after notice shall constitute your acceptance of this Privacy Policy. We may occasionally update this Privacy Policy to reflect changes in our software and/or products and customer feedback, or changes of Applicable Laws. When we post changes to this Privacy Policy, we will update the “last revised” date at the bottom of the Privacy Policy. Please read this Privacy Policy through and come back regularly.

This Privacy Policy may be translated into other languages for reference purpose. If there is any inconsistency or conflict between the English version and other versions of this Privacy Policy, the English version shall always prevail.

Personal information we collect

1. In order to provide products or services, we may collect information about you from time to time, including (but not limited to) information in the following categories:
 - (a) Identification data (e.g. name, address, telephone number, mobile number);
 - (b) Electronic identification data (e.g. IP addresses, cookies);
 - (c) Information about your usage of and interaction with our mobile applications, computer programs, software, products, and websites (including computer, platform, device and connection information, client performance information, error reports, device capability, bandwidth, statistics on page views, browser type and usage statistics);
 - (d) Traffic data (data processed for the purpose of the conveyance of communications or the billing);
 - (e) Payment details, including the credit card and bank information;
 - (f) Contact details, including contact person name, telephone number, fax number or email address etc.

You are not obliged to supply to us your personal data, however, we may be unable to provide you with the required goods and services if we do not have certain types of personal data from you.

In order to enhance your customer experience, further personal data may also be collected on a voluntary basis such as your age, date of birth, gender, education, profession, salary range, hobbies, interests and leisure activities, other related products and services subscribed, family and household demographics, and etc. We will indicate in the relevant forms or application whether the provision of the required personal data is on a voluntary basis.

In addition, your online session data may also be collected indirectly on an aggregated and anonymous basis.

If you are under the age of 13, you are required to ask your parent or guardian before providing any personal data to us.

Use of your personal information

2. Our primary purpose in collecting information is to provide you with a safe, smooth, efficient, and customized experience. Subject to your valid consent, we collect and use, or have third party service providers acting on behalf of us collecting and using, personal data relating to you, as permitted or necessary to:
 - provide you with phone, internet communication, and/or other products ;
 - take, process or deliver orders made via our websites, invoice you or notify you of the status of your order;
 - provide other services for you (as described when we collect the information);
 - administer, operate and manage loyalty programs;
 - communicate with you by email, phone, mail or other means;
 - process payment instructions, billing and refund;
 - provide you with customer support and troubleshoot problems;
 - compare information for accuracy;
 - inform you about service updates and faults;
 - request feedback or participation in on-line surveys;
 - handle enquiries, complaints and feedbacks;
 - resolve disputes;
 - verify your identity;
 - conduct internal research;
 - design and improve CMLink's products, software and websites;
 - plan and carry out CMLink's marketing or promotional operations/offers and similar events;
 - offer certain free of charge CMLink software, features and websites, through the support of advertising;
 - process debt recovery and credit checking;
 - obtain legal advice and establish legal claims or defences and in legal proceedings;
 - protect your, CMI's and CMIUK's interests, including in particular to enforce our Terms and Conditions and prevent and fight against fraud, (together, the Purposes).

Disclosure and transfer of your personal information

3. Except as provided below, we will not sell, rent, trade or otherwise transfer any personal and/or traffic data or communications without your explicit permission, unless it is obliged to do so under applicable laws or by order of the competent authorities.

In order to facilitate the purposes set out in paragraph 2, we may disclose personal information to:

- communicate with telecommunications network operators, CMI's or CMIUK's third party reward and loyalty program providers, agents, dealers, contractors, suppliers, professional advisers, any financial institutions, charge or credit card issuing companies, credit providers, credit information or reference bureaus, or collection agencies, security agencies;
- respond to legal requirements, exercise our legal rights or defend against legal claims;
- protect CMI's and CMIUK's interests, fight against fraud and to enforce our policies or to protect anyone's rights, property, or safety.

CMI, CMI's partner, CMIUK, CMIUK's partner, or the operator or company facilitating your communication may provide personal data, communications content and/or traffic data to an appropriate judicial, law enforcement or government authority or other organizations lawfully requesting such information. CMI and/or CMIUK will provide reasonable assistance and information to fulfill this request and you hereby consent to such disclosure.

Subject to your valid consent, CMI and/or CMIUK may give your information to other company located outside Hong Kong or United Kingdom, which may be a supplier or CMI's affiliate company, for the provision of CMI's and/or CMI's affiliate company's services.

Security and retention of your personal information

4. We keep your personal information while you are our customer or after you have stopped to use the service, but only when necessary or as required by Applicable Laws. We will take appropriate organizational and technical measures to protect the personal data and traffic data provided to it or collected by it with due observance of the applicable obligations and exceptions under the relevant legislation. Your personal and traffic data can only be accessed by authorized employees or third parties, and will only be retained for as long as is necessary to fulfil the original or directly related purposes for which it was collected, unless the personal and traffic data is also retained to satisfy any Applicable Laws or contractual obligations.
5. Our headquarters, which serves as Data Processor for the purpose of GDPR, is located outside EU. To allow the provision of CMLink Products to you, we require your approval of the transfer of your certain personal data to us:

Company Name	Company Address	Remark
China Mobile	Level 30, Tower 1, Kowloon Commerce Centre, International Limited No. 51 Kwai Cheong Road, Kwai Chung, New Territories, Hong Kong	Data may be processed in Hong Kong and/or China by China Mobile International Limited and/or its appointed third party service provider(s).

Direct marketing

6. Subject to your valid consent and in strict accordance with the Applicable Laws, CMI (and CMIUK as applicable) intends to use your personal data to deliver to you information about any goods and services, loyalty programs, activities (including joint collaboration with third parties), newsletters, contests, lucky draws and etc of us and our business partners. The said information may include various classes of marketing subjects including but not limited to mobile devices and accessories, network services such as TV, mobile voice, SMS and data communications, IDD/roaming, Internet connectivity, mobile applications, entertainment and data communications on Internet, other value-added services, as well as computer peripheral, accessories and software (including notebooks, handsets, keyboards, security installations and mobile applications), secretarial services, personal assistance services and information services, gaming, sports, music, beauty products, electronics, technology, ecommerce, mobile payment, travelling, banking, investment, entertainment, transportation, household, fashion, food and beverages, insurance, education, health and wellness, social networking, charity activities, media and high-end consumer products and services. The said information may be delivered to you by mail, phone, email, fax or other means.

CMI and CMIUK may not use your personal data for direct marketing unless CMI or CMIUK received your valid consent in accordance with Applicable Laws. If you wish to stop receiving direct marketing materials from us, you may write to us any time. In any such request, please state clearly your personal information and contact details for identification purposes.

Use of cookies and location data

7. If you visit any of our websites, CMI may use cookie files to store and track information about you and your preferences. A cookie is a small text file that our website transfers to your device. It allows us to better serve you and/or maintain your information across multiple pages within or across one or more sessions. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in future. Cookies contain information about you and your preferences. For example, if you inquire about rates and availability, the site might create a cookie that contains the details you entered. Or it might only contain a record of which pages within the site you visited to help the site customize the view for you the next time you visit. Only the information that you provide or the choices you make while visiting a website can be stored in a

cookie. For example, the site cannot determine your email address unless you choose to type it. Allowing a website to create a cookie does not give that or any other site access to the rest of your device, and only the site that created the cookie can read it.

CMI may use your location data to keep track of your activity patterns and preferences in order to improve the level of service you receive. Your location data may be combined with other information CMI receives from third parties to provide you with better service and, where you have consented to receive direct marketing, CMI may provide you with targeted advertisements, content, features, deals and offers.

Data access or correction

8. You have the right to access and, where relevant, to correct your personal information held by us. CMI and/or CMIUK will respond to requests to access, correct or remove your personal information within a reasonable period of time and upon verification of your identity.

We will use all reasonable endeavours to accommodate requests to delete personal information unless it is required to be retained by law or for lawful business purposes.

In accordance with the Applicable Laws, we reserve the right to charge a reasonable fee for the processing of any data access request.

Access by phone

9. When you use CMLink on your phone, CMI may use notification services available for that phone to let you know of any information when you are not actively running or using the CMLink application. These services may be provided by a third party. For example, messages sent to an Apple device will use Apple's Push Notification Services.

Notification services may receive information about the caller, sender of the message and the content of the message as part of providing the service and may use the information in accordance with the terms and conditions and privacy policy for the service provider. CMLink is not responsible for the data collected by third party notification services.

(Apple is a trademark of Apple Inc., registered in U.S. and other countries.)

Contact us

10. Should you have any question about the Privacy Policy above, please write to our Data Protection Team at the following address: Level 30, Tower 1, Kowloon Commerce Centre, No. 51 Kwai Cheong Road, Kwai Chung, New Territories, Hong Kong.

隐私政策 (以英文版本为准)

本隐私政策描述了中国移动国际有限公司 (“CMI”) 和中国移动国际 (英国) 有限公司 (“CMIUK”) 在收集、使用、披露和传输您的个人信息方面的政策和做法, 相关产品和服务如下:

- (i) CMLink SIM 卡;
- (ii) CMLink 月套餐;

(统称 “CMLink 产品”)

CMI 和 CMIUK (“我们”) 致力遵守适用的数据保护和隐私法律和法规 (“适用法律”)。适用法律包括但不限于《个人资料 (隐私) 条例》(香港特别行政区条例 (「私隐条例」) 第 486 章、英国 2018 年数据隐私法令 (The Data Privacy Act 2018 of United Kingdom, 「DPA」) 及通用数据保护条例(EU) 2016/679 (General Data Protection Regulation, 「GDPR」)。CMIUK 在英国信息专员办公室注册为数据控制者。本网站/应用由 CMI 运营。在适用法律允许的范围内, 并在适用法律要求的情况下获得您的有效同意。如您继续使用本网站或 CMLink 产品即表示您接受隐私政策。我们将不定期更新本隐私政策, 以反映我们的应用、产品以及基于客户反馈的更新或适用法律的变化。当我们发布对本隐私政策的更改时, 我们将更新隐私政策底部的 “最后修订” 日期。请通读本隐私政策并定期查阅。

本隐私政策可能会被翻译成其他语言以供参考。如果本隐私政策的英文版本与其他版本有任何不一致或冲突, 将以英文版本为准。

信息收集

1. 为了提供产品或服务, 我们可能会不时收集有关您的信息, 包括 (但不限于) 以下类别的信息:

- (a) 个人数据 (例如姓名、地址、电话号码、手机号码);
- (b) 电子设备标识数据 (例如 IP 地址、Cookies);
- (c) 我们的移动应用程序、计算机程序、软件、产品及网站使用和交互的信息 (包括计算机、平台、设备和连接信息、客户端性能信息、错误报告、设备功能、带宽、页面浏览量统计数据、浏览器类型和用量统计);
- (d) 流量数据 (用于通信或计费而处理的数据);
- (e) 支付信息, 包括信用卡和银行信息;
- (f) 联系方式, 包括联系人姓名、电话号码、传真号码或电子邮件地址等。

您没有义务向我们提供您的个人数据, 但如果我们没有您某些类型的个人数据, 我们可能无法为您提供所需的产品和服务。

为了提升您的客户体验，我们也可能在自愿的基础上收集更多的个人资料，例如您的年龄、出生日期、性别、教育程度、职业、薪资范围、爱好、兴趣和休闲活动，以及其他相关的产品和服务、家庭及住户人口统计资料等。我们会在相关表格或申请表中注明提供所需的个人资料是否属于自愿性质。

此外，您的在线会话数据也可能以汇总和匿名的方式间接收集。

如果您未满 13 岁，在向我們提供任何个人数据之前，您需要询问您的父母或监护人。

信息使用

2. 我们收集信息的主要目的是为您提供安全、流畅、高效和定制化的产品和服务体验。经您的有效授权，我们收集、使用或让第三方服务提供商代表我们收集和与您有关的个人数据，经允许或有必要收集和使用的情况如下：

- 为您提供电话、互联网通讯或其他产品；
- 通过我们的网站接收、处理或寄送订单，向您开具发票或通知您订单状态；
- 为您提供其他服务（具体见我们收集信息相关描述）；
- 执行、运营和管理用户满意度；
- 通过电子邮件、电话、邮件或其他方式与您沟通；
- 处理付款指引、计费 and 退款；
- 为您提供客户支持和解决问题；
- 核对信息的准确性；
- 通知您有关服务更新和故障的信息；
- 请求反馈或参与在线调查；
- 处理查询、投诉和反馈；
- 解决纠纷；
- 验证您的身份；
- 进行内部研究；
- 设计和改进 CMLink 的产品、软件和网站；
- 计划和执行 CMLink 的营销、促销活动或优惠及其他相似的活动；
- 提供某些免费的 CMLink 软件、功能和网站；
- 处理欠费追讨和信用检查；
- 获得法律建议并提出法律主张或抗辩；
- 保护您、CMI 和 CMIUK 的利益，尤其包括执行我们的条款和条件以及防止和打击欺诈行为（统称为“宗旨”）。

信息共享、披露和转移

3. 除以下规定外，未经您的明确许可，我们不会出售、出租、交易或以其他方式转让任何个人、流量数据或通信信息，除非根据适用法律或主管政府机构的命令进行必要处理。

为了推动第 2 部分中规定的“宗旨”，我们可能会将个人信息披露给：

- 与电信网络运营商、CMI 或 CMIUK 指定的第三方营销赠送和用户满意度服务提供商、代理商、经销商、承包商、供应商、专业顾问、金融机构、收款或信用卡发行方、信贷提供方、信用信息采集机构、安全机构；
- 响应法律要求、行使我们的合法权利或为法律索赔辩护；
- 保护 CMI 和 CMIUK 的利益，打击欺诈行为、执行我们的政策或保护他人的权利、财产和安全。

CMI、CMI 的合作伙伴、CMIUK、CMIUK 的合作伙伴、电信运营商可能会向司法、执法或政府机构及其他合法的组织提供您的个人数据、通信内容和流量数据信息。CMI 或 CMIUK 将提供合理的协助和信息来满足这些合法要求，您在此同意以上信息披露。

经您的有效授权，CMI 或 CMIUK 可能会将您的信息提供给位于香港或英国以外的其他公司，该公司可能是 CMI 的供应商或关联公司，这些公司提供 CMI 及其子公司相关服务。

信息安全和保存

4. 在您是我们的客户期间或在您停止使用服务后，我们会保留您的个人信息，但仅在必要或适用法律要求时保留。我们将采取适当的组织管理和技术措施来保护向其提供或由其收集的个人信息和流量数据，同时遵守相关法律规定的个人信息保护义务和例外情况。只有 CMI 授权的员工或第三方服务提供方才能访问您的个人信息和流量数据，并且只会在满足原始或直接的收集目的所需的时间内保留，除非个人信息和流量数据被保留用于任何适用法律或合同义务。
5. CMI 总部作为 GDPR 的数据处理者，位于欧盟以外。为了能向您提供 CMLink 产品和服务，我们需要您同意将您的部分个人数据传输给 CMI 或 CMLink 总部：

公司名称	公司地址	备注
中国移动国际有限公司	香港新界葵涌葵昌路 51 号九龙贸易中心 1 座 30 楼	数据可能在中国香港或中国内地进行处理

营销推广

6. 在您的有效授权同意并严格遵守相关法律的情况下，CMI（以及 CMIUK）和第三方合作伙伴将会使用您的个人数据向您提供我们有关的产品和服务、包括用户满意度计划、营销活动（含第三方合作方）、信件、比赛、幸运抽奖等。所述产品和服务可能包括各类市场推广活动，包括但不限于移动设备和配件、网络服务（如电视、移动语音、SMS 和数据服务）、IDD/漫游、互联网连接、移动应用程序、线上娱乐和数据通信和其他增值服务，也包括终端外围设备、配件和软件（包括笔记本电脑、手机、键盘、安全装置和移动应用程序）、个人助手服务、个人自助服务和信息服务、游戏、体育、音乐、美容产品、电子、科技、电子商务、移动支付、旅游、银行、投资、娱乐、交通、家居、时尚、食品和饮料、保险、教育、健康和保健、社交网络、慈善活动、媒体和高端消费产品和服务。上述信息可能会通过信件、电话、电子邮件、传真或其他方式提供给您。

如非获得您的有效授权同意，CMI 或 CMIUK 不会将您的个人资料用于营销推广。如果您希望停止接收我们的营销推广信息，您可以随时联系给我们。在这类请求中，请说明清楚您的个人信息和联系方式，以便识别登记。

Cookie 和位置数据

7. 如果您访问我们的网站，CMI 可能会使用 Cookie 文件来存储和跟踪您的偏好信息。Cookie 是我们网站与您的设备间传输的小型文本文件。它允许我们在一个或多个会话内的页面上更好地服务和维护您的信息。大多数的浏览器会自动接受 Cookie，但如果您有需要，您也可以编辑浏览器设置选项来阻止收集 Cookie。Cookie 包含有关您的偏好信息。例如，如果您查询价格和可用性，该站点可能会创建一个包含您所输入详细信息的 Cookie。或者它可能会记录您访问过的网站页面，以帮助网站在您下次访问时为您提供个性化内容。只有在您访问网站时选择同意，才能将您的信息存储在 Cookie 中。例如，除非您选择输入电子邮箱，否则网站无法确定您的电子邮箱。只有允许创建 Cookie 的网站才能访问您的信息，您设备的其他网站不能访问。

CMI 可能会使用您的位置数据来追踪您的服务偏好，以便为您提供更好的服务体验。CMI 也可能结合您的位置数据和其他第三方信息使用，以便为您提供更好的服务。在您同意接收营销推广的情况下，CMI 可能会为您提供有针对性的广告、内容、功能、交易和优惠等。

数据访问或更改

8. 您有权访问和必要更正我们所收集您的个人信息。CMI 和或 CMIUK 将在验证您的身份后响应查询、更正或删除您的个人信息处理请求。

我们将竭尽所能满足删除个人信息的请求，除非由于法律要求或合法商业目的保留。

根据适用法律，我们将保留对数据访问请求处理而收取合理费用的权利。

通过手机访问

9. 当您在手机上使用 CMLink 时，在您未主动运行或使用 CMLink 应用程序时，CMI 可能会使用手机的通知服务。这些服务可能由第三方提供。例如，发送到 Apple 设备的消息用于 Apple 的推送通知服务。

作为提供服务的一部分，通知服务可能会根据服务提供商的条款和条件以及隐私政策使用主叫方、短信发送方和短信内容的信息。CMLink 将不对第三方通知服务收集的数据负责。

(Apple 是 Apple Inc. 在美国和其他国家/地区注册的商标。)

联系我们

10. 如您对上述隐私政策有任何疑问，请按以下地址致函联系我们的隐私保障小组：香港新界葵涌葵昌路 51 号九龙贸易广场 1 座 30 楼。