

# Vodafone TV – Privacy Statement

This privacy supplement gives some additional information specific to Vodafone TV and the processing we do either when you watch TV on your set top box or the Vodafone TV App. For general information about how we process your data, including the data we process as part of providing broadband connectivity if you have purchased Vodafone TV as part of a package, visit our main [Privacy Policy](#).

Last updated: March 2022

## Who we are

We are Vodafone Albania Sh.A. and we are a member of Vodafone Group Plc.

In this privacy policy:

- “we/us” means Vodafone Albania Sh.A.
- “third party” means someone who is not you or us; and
- “Vodafone Group” means Vodafone Group Plc and any company or other organisation in which Vodafone Group Plc owns more than 15% of the share capital.

Our registered office is at Autostrada Tiranë-Durrës, Rr. “Pavarësia”, Nr. 61, Kashar, Tiranë, Albania. Vodafone Albania is an entity registered at the National Business Centre (NIPT number K11715005L) and it is also registered as a controlling entity with the Office of the Commissioner for the Right to Information and Personal Data Protection (IDP) in accordance with the requirements of Law No. 9887, dated 10.03.2008, “On the Protection of Personal Data”, as amended.

## How to contact us

Your opinion matters to us – if you have any questions about our privacy policy, you can email us at: [alfunc.askprivacy@vodafone.com](mailto:alfunc.askprivacy@vodafone.com) or you can write to our privacy team at:

Privacy Team  
Vodafone Albania  
Autostrada Tiranë-Durrës  
Rr. “Pavarësia”, Nr. 61  
Kashar, Tiranë,  
Albania

## Personal information we collect about you

### Information we collect about you

The types of information we process about you when you watch TV on your set top box or through the App are:

- Your name, address, date of birth and email address;
- Your credential information such as passwords, hints and similar security information used for authentication and access to accounts and services;
- Your account information, such as the TV plan you are on and the viewing profiles you have set up;
- Your viewing history and the recommendations we show you;
- Your viewing habits (such as when you Bookmark, Favourite or add a show to your Wishlist);
- Customer care information through your contact with us, such as a note or recording of a call you make to one of our contact centres;
- Information about your mobile device or set top box. For example, we collect information on the type of mobile device that you are using and its unique device identifier (for example, the IMEI number, the device’s mobile phone number, or the MAC address of the device’s wireless network interface);
- Information about your usage of the App, such as how often you use it; and
- Your location data. This can be precise where it uses Global Positioning System (GPS) data or by identifying nearby mobile phone masts and Wi-Fi hotspots where you are watching TV on a mobile device. Or less

precise where, for example, a location is derived from your IP address or data such as a post code or name of a town or city.

We'll also get information about how you use our products and services, such as:

- The level of service that you receive – for example, network or service faults and other events that may affect our network services or other services;
- Details of your use of our services – for example, how popular content is with our customers and which content is most requested; and
- We also collect anonymous analytics information on how our customers use the Vodafone TV App in order to improve your experience and troubleshoot.

When we collect your personal information

We collect your personal information when:

- You first purchase Vodafone TV;
- When you watch or purchase content provided by Vodafone TV or use the Vodafone TV App; or
- You contact our customer care teams with a question or complaint.

Vodafone will process your personal data based on:

1. **The performance of your contract or to enter into the contract** and to take action on your requests. For example, we process your account information and payment details for monthly billing of the service.
2. **Vodafone's legitimate business interests**, for example, fraud prevention, maintaining the security of our network and services, direct marketing when we have your consent, and improvement of our services. Whenever we rely on this lawful basis to process your data, we assess our business interests to make sure they do not override your rights. Additionally, in some cases you have the right to object to this processing. For more information, visit the 'Your Rights' section of this policy.
3. **Compliance with a mandatory legal obligation**, including for example accounting and tax requirements, which are subject to strict internal policies (such as retention periods), procedures, and your right to restrict usage of your data, which control the scope of legal assistance to be provided; or
4. **Consent you provide** where Vodafone does not rely on another legal basis. Consent is always presented to you separately and you can withdraw your consent at any time.

## How we use your personal information

To provide you with your service

We use your data to provide you with the service you have purchased, such as:

- Viewing, recording and accessing content;
- Purchasing further content; and
- Providing customer care and troubleshooting.

Profiling & automated decision making

We conduct profiling on your viewing habits; this data is not used for other purposes than recommending other shows and content that you might want to watch.

## How we share your personal information

Where applicable, we share information about you with:

- Companies in the Vodafone Group;
- Partners, suppliers or agents involved in delivering the products and services you've ordered or used;
- Companies who are engaged to perform services for, or on behalf of, Vodafone Limited, or Vodafone Group;
- Credit reference, fraud-prevention or business-scoring agencies, or other credit scoring agencies;
- Debt collection agencies or other debt-recovery organisations;
- Law enforcement agencies, government bodies, regulatory organisations, courts or other public authorities if we have to, or are authorised to by law; or

- A third party or body where such disclosure is required to satisfy any applicable law, or other legal or regulatory requirement.

We also share aggregate viewing information with content provider partners to understand how popular content is with our customers. For example, if we know that certain shows are popular, we'll focus on getting similar content for you. This information does not identify you personally.

## International data transfers

We do not transfer your data outside of the country, data is stored in Albania and in whichever local market of whom you are a customer.

## How long we keep your personal information for

We'll store and process your information for as long as we have to by law or as long as we need to be able to deliver you the services you have requested. The data we collect for your recommendations, analytics and customer support is stored for 6 months.

We'll keep some personal information for a reasonable period after your contract with us has finished in case you decide to use our services again. We, or one of our partners, may contact you about Vodafone services during this time if you haven't opted out of receiving marketing communications from us. Once these bases have expired, we'll delete that information.

## Keeping your personal information secure

We have specialised security teams who constantly review and improve our measures to protect your personal information from unauthorised access, accidental loss, disclosure or destruction.

Communications over the internet (such as emails) aren't secure unless they've been encrypted. We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

We'll never ask for your secure personal or account information by an unsolicited means of communication. You're responsible for keeping your personal and account information secure and not sharing it with others.

Our website may provide links to third-party websites. We cannot be responsible for the security and content of such third-party websites. So make sure you read that company's privacy and cookies policies before using or putting your personal information on their site.

The same applies to any third-party websites or content you connect to using our products and services.

You may choose to disclose your information in certain ways such as social plug-ins (including those offered by Google, Facebook, Twitter and Pinterest) or using third-party services that allow you to post reviews or other information publicly, and a third party could use that information.

Social plug-ins and social applications are operated by the social network themselves and are subject to their own terms of use and privacy and cookies policies. You should make sure you're familiar with these.

## Your rights

Below we set out details on how you can exercise your rights. If you have a question or cannot find the answer, please contact our Customer Services team at [nakontaktoni@vodafone.com](mailto:nakontaktoni@vodafone.com).

### Right to correct personal data

If you are informed that the information held about you is not accurate, you have the right to request the correction of your personal data.

### Right to access personal data

You have the right to request, at any time, information on your personal data held by Vodafone and to make a request for a copy of the personal data being processed.

### Right to data portability

You have the right to request that your data is moved to another company.

### Right to object to use of personal data

You have the right, in certain circumstances, to object to Vodafone processing of your personal information.

### Right to erasure

Vodafone strives to only process and retain your data for as long as we need to. In certain circumstances you have the right to request that we erase personal data of yours that we hold. If you believe your personal data has been collected and processed in violation of the law, you have the right to request the deletion of your personal data as well as the immediate cessation of processing.

### How to lodge a complaint

If you want to contact us about any of your rights or complain about how we use your information, contact our Customer Services team at [nakontaktoni@vodafone.com](mailto:nakontaktoni@vodafone.com).

If you are not satisfied with the handling of requests by Vodafone Albania, you always have the right to contact the Office of the Commissioner for Personal Data Protection at this address: Rr. "Abdi Toptani", Nd. 5, 1001, Tiranë

For more information, visit the Commissioner's website: [www.idp.al](http://www.idp.al).