

Privacy Policy

Megga Telecom, operating as eSIMCrew (www.eSIMCrew.com), recognizes the importance of your privacy. This privacy policy tells you what personal information we collect and how we use it. eSIMCrew may change this privacy policy from time to time, in its sole discretion, as discussed in section '9. Changes to This Policy' below. By registering an account or otherwise using or visiting any eSIMCrew website, application, product, software, tool, data feed, and/or service (collectively the "Service"), you understand and agree to the terms of this policy. Please read this policy carefully.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact us directly at hello@esimcrew.com or find more information under section '7. How Does a User Change Or Update Information'.

eSIMCrew is committed to your privacy. This privacy notice explains how we collect, use, disclose, retain, and protect your personal information.

A few key principles regarding GDPR;

- **A clear purpose:** the controller must specifically inform the customer of the use he will make of his personal data by collecting them.
- **Relevant data:** the controller must only collect data that is strictly necessary for his treatment; this is the principle of minimizing collection.
- **The retention period:** the personal data must be kept enough time to the controller to achieve its purpose; beyond that time, the data must be deleted.
- **The rights of individuals:** individuals can exercise their rights over the personal data held by the controller: access, rectification or deletion.

1. What Information Do We Collect?

1.1. Personally-Identifiable Information

We may collect personally identifiable information when you specifically and knowingly provide it to us, for example when you sign up for our newsletter or chat, create an account, request more information on our contact us page, respond to a survey or questionnaire and provide personal information such as your email address, name, phone number or other information. Where applicable, personally identifiable information includes personal data as defined in applicable law.

This Privacy Policy does not apply to the privacy practices of third parties that we do not own or control, including but not limited to any third party websites, services, applications, online resources to which this Site may link or otherwise reference (collectively Third Party Services or TPS) that you may access through the Services. For example, the Services utilize the Facebook API Services as a TPS, and you are agreeing to be bound by the Facebook [Terms of Service](#), [Privacy Policy](#) and [API Services Terms of Service](#) when engaging Facebook content and services through the Service. We take no responsibility for the content or privacy practices of any TPS. We encourage you to carefully review the privacy policies of any TPS you access.

eSIMCrew does not consider personally identifiable information to include information that has been anonymized so that it does not allow a third party to identify a specific individual. We collect and use your personally-identifiable information to provide the services, operate and improve our service, provide customer service, perform research and analysis aimed at improving our products, service and technology, and display content that is customized to your interests and preferences.

You may always choose not to provide personally identifiable information, but if you choose so, certain parts of the Service may not be available to you. If you have registered an account with us, you will have agreed to provide your personally identifiable information in order to access the services. This consent provides us with the legal basis we require under applicable law to process your data. You maintain the right to withdraw such consent at any time. If you do not agree to our use of your personal data in line with this policy, please do not use our Services.

1.2. Sensitive Personal Data

Subject to the following paragraph, we ask that you do not send us, and you do not disclose, any sensitive personal data (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the services or otherwise to us.

If you send or disclose any sensitive personal data to us when you submit content to the services, you consent to our processing and use of such sensitive personal data in accordance with this policy. If you do not consent to our processing and use of such sensitive personal data, you must not submit such content to us. Please note that even if these information are provided, we will not store them anywhere on our side.

1.3. Non-Personally-Identifiable Information

We may collect and aggregate non-personally identifiable information which is information which does not permit you to be identified or identifiable either by itself or in combination with other information available to a third party. This information may include information such as a website that referred you to us, your IP address, browser type and language, hardware types, geographic location, and access times and durations. We also may collect navigational information, including information about the service content or pages you view, the links you click, and other actions taken in connection with the service. We use this information to analyse usage patterns as part of making improvements to the Service.

1.4. Cookies, Pixels and Local Storage

We may collect information using cookies, which are small data files stored on the hard drive of your computer or mobile device by a website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them) to provide you with a more personal and interactive experience when using the Services.

We use two broad categories of cookies: (1) first party cookies, served directly by us to your computer or mobile device, which are used only by us to recognize your computer or mobile device when it revisits any site or application that is party of the Services; and (2) third party cookies, which are served by service providers on sites or applications and can be used by such service providers to recognize your computer or mobile device when it visits other websites.

2. Cookies We Use

2.1. Type of Cookies

The Services use the following types of cookies for the purposes set out below:

Strictly Necessary Cookies: These cookies are essential to provide you with services available through the Services and to enable you to use some of its features. For example, they allow you to log in to secure areas of the sites or applications and help the content of the pages you request load quickly. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services.

Functionality Cookies: These cookies allow the Services to remember choices you make when you use a site or application, such as remembering your language preferences, remembering your login details and remembering the changes you make to other parts of your account or preferences. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you use the Services.

Performance Cookies: These cookies are used to collect information about traffic to the services and how users use the services. The information gathered does not identify any individual visitor. The information is aggregated and anonymous. It includes the number of visitors to, the websites that referred them, the pages visited, what time of day they visited, whether they have visited before, and other similar information. We use this information to help operate the services more efficiently, to gather broad demographic information and to monitor the level of activity on our services.

We use Google Analytics for this purpose. Google Analytics uses its own cookies. It is only used to improve how the services work. You can find out more information about Google Analytics cookies

here: <https://developers.google.com/analytics/resources/concepts/gaConceptsCookies>

You can find out more about how Google protects your data

here: www.google.com/analytics/learn/privacy.html

You can prevent the use of Google Analytics relating to your use of the services by downloading and installing the browser plugin available via this

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

Targeting Cookies / Advertising Cookies: These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaigns. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

2.2. Disabling Cookies

Google AdWords Conversion Tool : Privacy information of the provider (<https://goo.gl/CUUMgi>), Link to Opt-Out (<https://goo.gl/ghZWnt>).

On www.youronlinechoices.com you can read more about cookies and the individual providers. There you can also opt out of usage-based online advertising through one or more tools. To go directly to the preference manager, please click [here](#).

2.3. Facebook Custom Audiences

In the context of usage-based online advertising, we also use communication tools of Facebook, in particular custom- and website custom audiences. Basically, a non-

reversible and non-personal checksum (hash value) is generated from your usage data, which can be transmitted to Facebook for analysis and marketing purposes. For website custom audiences the Facebook cookie is addressed. For more information on the purpose and scope of the data collection and further processing and use of the data by Facebook and your options to protect your privacy, please refer to the privacy policy of Facebook, which you can see [here](#). If you want to object to the use of Facebook website custom audiences, you can do so [here](#).

2.4. Pixel Tags

We may also use pixel tags (which are also known as web beacons and clear GIFs) on the Services to track the actions of users on our sites and applications. Unlike cookies, which are stored on the hard drive of your computer or mobile device by a website, pixel tags are embedded invisibly on webpages. Pixel tags measure the success of our marketing campaigns and compile statistics about usage of the services, so that we can manage our content more effectively. The information we collect using pixel tags is not linked to our users personal data.

2.5. Do Not Track Signals

Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to do not track signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

3. What Do We Do With The Information That We Collect?

3.1. Information That We Collect

Except as disclosed in this privacy policy, eSIMCrew does not share your personal information with any outside parties.

eSIMCrew will use the personally identifiable information directly provided by you solely for the purpose for which you have provided it, which may include:

- to operate, maintain, and improve the Services;
- to manage your account, including to communicate with you regarding your account;
- to operate and administer any promotions you participate in on any site or application;
- to respond to your comments and questions and to provide customer service;
- to send information including technical notices, updates, security alerts, and support and administrative messages;
- with your consent, to send you marketing emails about upcoming promotions, and other news, including information about products and

services offered by us and our affiliates. We retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our content, products or services, such as when you last opened an email from us. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

- You may opt-out of receiving such information at any time: such marketing emails tell you how to opt-out. Please note, even if you opt out of receiving marketing emails, we may still send you non-marketing emails. Non-marketing emails include emails about your account with us (if you have one) and our business dealings with you;
- to process payments you make via the Services; and as we believe necessary or appropriate (a) to comply with applicable laws; (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities; (c) to enforce our Policy; and (d) to protect our rights, privacy, safety or property, and/or that of you or others.

We may share this information with service providers who perform services on our behalf, such as those services listed above, or other services like processing information requests, displaying stored data you access, to assist us in marketing, to conduct audits, etc. Those companies will be permitted to obtain only the personal information they need to provide the service they provide, will be required to maintain the confidentiality of the information, and will be prohibited from using it for any other purpose.

We may also use information you provide to better serve you, and, if you have given your consent for us to do so, to send you email or text messages concerning offers from our partners and other third parties that we think may be of interest to you. If you do not wish to receive marketing emails, you may adjust your Personal Information Preferences as described below or follow the unsubscribe or stop instructions included within each communication. We use MailChimp as our marketing automation platform. By submitting the information you provide us, you acknowledge that the information will be transferred to MailChimp for processing in accordance with their [Privacy Policy](#) and [Terms](#).

We will only retain your personally identifiable information as long as reasonably required to provide you with the Services unless a longer retention period is required or permitted by law (for example, for regulatory purposes). eSIMCrew will provide you with information about eSIMCrew' data and how it will be used upon request. Should your data stored by eSIMCrew be incorrect, eSIMCrew will correct it. In this regard, you can write to eSIMCrew at the address listed in section '7. How Does A User Change Or Update Information' or contact them in any other way. In addition, customers can view the data in their account that eSIMCrew has stored about them and correct it if necessary.

You may contact us anytime to opt-out of: (i) direct marketing communications; (ii) our collection of sensitive personal data; (iii) any new processing of your personal data that we may carry out beyond the original purpose. Please note that your use of some of the Services may be ineffective upon opt-out. You may also: (A) access the data we hold about you at any time via your account or by contacting us directly; (B) update or correct any inaccuracies in your personal data by contacting us; (C) in certain situations, for example when the data we hold about you is no longer relevant or is incorrect, you can request that we erase your data. You may contact us at hello@esimcrew.com anytime for any other questions you may have about your personally identifiable information and our use of it.

4. Disclosure

As a general rule, eSIMCrew will not disclose any of your personally identifiable information except under one of the following circumstances:

- we have your permission, including the permission granted by your acceptance of this Privacy Policy;
- we determine in good faith that it is legally required to be revealed by any relevant statute, regulation, ordinance, rule, administrative or court order, decree, or subpoena;
- it is information that we determine must be disclosed to correct what we believe to be false or misleading information or to address activities that we believe to be manipulative, deceptive or otherwise a violation of law; where you are otherwise notified at the time we collect the data;
- where we need to share your information to provide the product or service you have requested; when such disclosure is made subject to confidentiality restrictions in connection with a sale, merger, transfer, exchange, or other disposition (whether of assets, stock, or otherwise) of all or a portion of the business conducted by eSIMCrew. eSIMCrew may share the non-personally identifiable information that eSIMCrew gathers, in aggregate form only, with advertisers and other partners.

5. Children's Policy

The Terms of service clearly provide that Users must be (i) 18 or older, or (ii) 13 and older if either (a) an emancipated minor, or (b) he/she possess legal parental or guardian consent. eSIMCrew does not knowingly collect personally identifiable information from users under 13. In the event that we learn that we have collected any personal information from a user under the age of 13, we will attempt to identify and delete that information from our database.

6. International Usage

The Service is owned by Megga Telecom and may be accessed in Europe and abroad. For data protection purposes, eSIMCrew is the controller and, Bluehouse Technology is the processor of data. Information collected may be retained, and may be stored, processed, accessed, and used in jurisdictions whose privacy laws may be different and less protective than those of your home jurisdiction. eSIMCrew has also contracted with third party service providers to manage the logistics and customer support for an optimal 24/7 service. Some data needs to be disclosed and transferred to these third party to ensure the fulfilment of the service. All third party involved have been engaged under a binding confidentiality agreement and have a limited access to eSIMCrew database for the purposes of providing support.

7. How Does A User Change Or Update Information?

If you have any questions or concerns about this privacy policy or would like the personally identifiable information that you have provided to be removed from our files, please contact eSIMCrew via email at hello@esimcrew.com.

8. Security and Encryption

We follow generally accepted industry standards to help protect your personal information. No method of transmission over the internet, mobile technology, or method of electronic storage, is completely secure. Therefore, while we endeavor to maintain physical, electronic, and procedural safeguards to protect the confidentiality of the information that we collect online, we cannot guarantee its absolute security. Our service has security measures in place designed to protect against the loss, misuse and alteration of the information under our control. We use standard Secure Socket Layer (SSL) encryption that encodes information for such transmissions. All service information is maintained on secure servers. Access to stored data is protected by multi-layered security controls including firewalls, role-based access controls and passwords. You are responsible to keep your password secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us at hello@esimcrew.com.

9. Changes to This Policy

We reserve the right to change the terms of this privacy policy at any time. When we make changes, we will revise the last updated date at the top of the policy. If there are material changes to this statement or in how we will use your personal information, we will notify you by prominently posting a notice of such changes here or on our home page, or by sending you an email. We encourage you to review this policy whenever you visit one of our websites or applications.

