



Privacy Policy for the Device Trade In Service

1. Your data – our responsibility

Your privacy is important to us. Here you can read how we, Vodafone Ireland, (hereinafter referred to as **Vodafone** or **we**) handle your personal data as the person responsible for data processing.

2. Data protection information for the Trade in service

The Trade In Service (also referred as “Trade In”) enables you, as a Vodafone mobile phone customer, to sell an old device to the company Recommerce Solutions (hereinafter referred to as Recommerce).

Vodafone enables the residual value of your old device to be determined using an online diagnostics process and, as part of the process, authenticates you as a Vodafone mobile phone customer. At the end of the process, you decide whether you want to sell the old device to Recommerce at the determined residual value. The residual value is paid to your chosen bank account by Recommerce.

If you decide to proceed with the trade in, your customer data, which is required for processing the sale, will be transmitted by Vodafone to Recommerce. For further details on how Recommerce processes your personal data for the purpose of fulfillment of the contract between you and Recommerce, please see Recommerce privacy policy [here](#).

To facilitate the return of your old device, Recommerce will arrange for a prepaid envelope to be delivered to you by their third party. This third party will process your contact details only for provision of the envelope to you and is not authorised to use your data for any other purposes.

3. Categories of personal data collected and stored

The following categories of personal data are processed in connection with Trade In, including the evaluation of the old device and the granting of a credit to your personal bank account:

- Data relevant for your authentication as a Vodafone customer, such as telephone number or e-mail address
- Your contact details such as name, address, and eircode for fulfilment purposes
- Bank account details (IBAN) for facilitating payment to you of the agreed trade in amount
- Data that you provide to us when evaluating your old device e.g. device model and IMEI number

4. Purpose and legal basis of data processing

We use your personal data for the following purposes:

- a. Processing and provision of our services and the services of our partners (e.g. online diagnosis of the old device to determine the residual value)
- b. Authentication of the customer through automated checking of the phone number
- c. Direct dispatch of documents such as the shipping label and prepaid envelope, and accepting the return of the device sent to Recommerce
- d. Processing of the payment of the residual value of the device to your bank account by Recommerce
- e. For customer support

The following legal bases apply to the above purposes of processing:



- The fulfillment of the contract as personal data processing is necessary in order to be able to handle the diagnosis process on the old device, to facilitate purchase of the old device and to make the payment as a credit to the customer bank account. Without the provision and use of your data for the purposes described above, it is not possible to carry out the process.
- Vodafone's legitimate business interests, for example to maintain and improve our services or to comply with commercial and tax documentation requirements. Whenever we rely on these bases to process your data, we assess our business interests to make sure they do not override your rights. In these cases, you generally have the right to object to this processing. See the Your data protection rights section for more information.

5. Deletion of your data

Your data will only be kept for as long as is necessary to process the contract and provide the service or carry out the campaign. Your data will then be deleted unless we are obliged to store it for a longer period of time due to tax and commercial law storage and documentation obligations. In this case, we will delete your data once the relevant retention period has expired.

For further details on how Recommerce processes your personal data for purposes of fulfillment of the contract between you and Recommerce, please see Recommerce privacy policy [here](#).

6. Recipients or categories of recipients

Recommerce is a recipient of your data, as defined in section 3 of this document, and acts as an independent controller as this is necessary for the provision of services and processing of the Trade In Service. Recommerce acts as a contractual partner for the purchase of the old device and the payment of the residual value.

A transfer of your data to a third country outside the European Union or the European Economic Area or an international organization does not take place.

7. International Transfer

The Trade In Service doesn't involve any processing or transfer of personal data outside of European Economic Area (EEA). For any partners outside the European Economic Area, we work in accordance with European data protection standards. In practice this means we put in place standard contractual clauses into the contract or the European Commission has expressly stated that the data protection level in our partner's country is adequate.

8. Data sharing

The exchange of personal data (e.g. information for authentication) takes place via an encrypted and secure transmission. The communication and transmission of the data takes place exclusively between the servers of Vodafone and Recommerce.

9. Your data protection rights

If you wish to exercise your data protection rights, you need to contact each entity (Vodafone and Recommerce) separately using contact details provided below or in the applicable privacy policy.

If you have any questions about your data protection rights, whether it's access, correction, deletion or objection, use our dedicated email contact dataprotection.ie@vodafone.com or call our customer care team on 1907.



If we cannot clarify your data protection concerns, you can contact the [Data Protection Commission](#), which is the supervisory authority for Ireland.

For data protection questions with regards to Recommerce contact the Data Protection Officer, reachable by email dataprivacy@recommerce.com.