

# Privacy Policy

**Effective Date:** 01.06.2023

**Last Updated:** 30.07.2025

This Privacy Policy explains how **Globtel Latvia SIA** (“**Globtel**,” “**we**,” “**our**,” or “**us**”) collects, uses, and protects your personal data when you use our services, including our eSIM, phone, messaging, and connectivity solutions. This Policy applies to both individual and business users globally.

Globtel Latvia SIA

Skolas iela 38 - 58,

Jūrmala, LV-2016, Latvia

Email: [DPO@globtel.de](mailto:DPO@globtel.de)

## 1. What Personal Data We Collect

We collect only the minimum necessary data to deliver our services:

### **Automatically collected:**

- IP address, device information, browser type
- Activity logs (e.g., service usage, login events)
- Cookies (see Section 7)

### **When you sign up or use services:**

- Name, email address, and phone number
- Payment method and transaction data (not full credit card numbers)
- Country of residence or location (where needed for service delivery or compliance)

### **When required by law (e.g. KYC/AML):**

In some jurisdictions, especially for eSIM services or local phone numbers, we may request:

- Proof of identity (e.g. passport or ID card)
- Proof of address (e.g. utility bill or rental agreement)
- Selfie or facial verification (if required by law)

We do **not** collect or store more information than legally required and never collect sensitive data unless required for compliance.

## 2. How We Use Your Data

We use your data to:

- Provide, activate, and manage services (eSIM, calling, messaging)
- Verify identity where required by law
- Manage customer relationships and communicate with you
- Prevent fraud and ensure service integrity
- Comply with legal and regulatory obligations
- Improve and maintain our website and infrastructure

We do **not** use personal data for profiling or automated decision-making.

## 3. Legal Basis for Processing

Our processing of personal data is based on:

- **Contractual necessity:** to provide services you request
- **Legal obligation:** to comply with telecom regulations or KYC requirements
- **Legitimate interests:** to prevent fraud, maintain security, or improve services
- **Consent:** where legally required, e.g. for marketing communications or cookie usage

## 4. Who We Share Data With

Globtel does **not sell** or share your personal data with third parties for marketing or commercial purposes.

We may disclose data only to:

- Regulators, tax authorities, or law enforcement when legally obligated
- Network infrastructure partners to route your communications
- Payment processors for handling transactions
- Our legal or compliance advisors (under confidentiality)

## 5. Data Transfers

Globtel stores and processes your data in the **European Union**. When data is transferred outside the EU (e.g. to a telecom partner), we ensure appropriate safeguards, such as:

- Standard Contractual Clauses approved by the European Commission
- Data processing agreements with required security standards

## 6. Data Retention

We retain personal data only for as long as necessary for:

- Service provision
- Legal or regulatory compliance (e.g. telecom recordkeeping)
- Resolving disputes and enforcing our agreements

For example:

- Call and messaging logs: retained for up to 12 months (unless required longer by law)
- KYC documents: retained for as long as required by applicable law

- Payment records: retained for 7 years under accounting rules

## 7. Cookies and Tracking

Globtel uses **cookies** and similar technologies to:

- Enable secure login and account functionality
- Analyse site usage and performance
- Remember language or session preferences

You can manage your cookie preferences through your browser. Certain cookies are essential to our services and cannot be disabled.

## 8. Your Rights

Depending on your location, you may have the following rights:

- **Access** – know what personal data we hold
- **Correction** – fix inaccurate or incomplete data
- **Erasure** – request deletion of your data (where legally possible)
- **Restriction** – limit how we use your data
- **Portability** – obtain your data in a readable format
- **Objection** – object to processing under legitimate interest
- **Withdraw consent** – at any time where processing is based on consent

To exercise your rights, contact us at [DPO@globtel.de](mailto:DPO@globtel.de).

## 9. Additional Rights for UK & California Users

### California (CCPA/CPRA):

You have the right to:

- Know what categories of personal information we collect
- Request deletion of personal information
- Opt out of the sale or sharing of your personal information (we don't sell any)
- Appoint an authorised agent to act on your behalf

To make a request, contact: [DPO@globtel.de](mailto:DPO@globtel.de)

### **United Kingdom (UK GDPR):**

You have similar rights to EU users under the UK GDPR. We apply equivalent protections to all our users globally.

## **10. Data Security**

Globtel implements strict technical and organisational measures to protect your data, including:

- Encrypted data storage and communications
- Multi-factor authentication and access controls
- Regular vulnerability assessments

## **11. Changes to This Policy**

We may update this Privacy Policy from time to time. Changes will be posted on [www.globtel.biz](http://www.globtel.biz) and take effect upon publication. Where legally required, we will notify you directly before changes take effect.

## **12. Contact**

If you have questions, requests, or complaints regarding your personal data, contact:

**Data Protection Office**

Email: [DPO@globtel.de](mailto:DPO@globtel.de)

Mail: Globtel Latvia SIA

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