



Rova Privacy Policy

Rova (hereafter 'we' or 'rova') values your privacy and is committed to protect your personal data. This privacy notice (the 'Privacy Notice' or "Notice") has been updated in accordance with the General Data Protection Regulation EU 2016/679 (hereafter "GDPR", "Regulation") and the Kingdom of Bahrain's Personal Data Protection Law (No. 30 of 2018 with respect to Personal Data Protection) ("PDPL").

This Privacy Notice applies to all users (hereinafter referred to as "you") of our website www.rovaesim.com (the "Website" or the "Site"), our application rova – Travel eSIM & Data (the "App"), collectively referred to as the "Platforms", as well as the services provided through these Platforms.

It explains how we collect and process your personal data through the Platforms, including how we collect and use your data, what your rights are and who are the third parties we share your data with. We encourage you to read this Notice, before using the Platforms.

Please note you are not required to provide us with your personal data. However, in certain instances, if you do not provide us with your personal data, we may not be able to provide our service.

1. Definitions

The definitions of "automated decision", "data controller", "data processor", "legal basis", "personal data", "purpose", "processing" have the same meaning as set out under the GDPR.

2. Data Controller

Stc Bahrain B.S.C. Closed, registration no. (71117), and having its address located at STC Tower 15, Road 68, Block 428, P.O. Box 21529, Seef District, Kingdom of Bahrain, is the data controller and is responsible for the processing of your data.

In accordance with art. 27 GDPR, we have appointed an EU Representative. If you are located in the European Union (EU) and have any questions or concerns regarding the processing of your personal data, you may contact our EU representative, GVZH SERVICES LIMITED, at data-rep@rovaesim.com.

If you are not located in EU you can contact us using our postal address: STC Bahrain – P.O. Box 21529 Manama, Kingdom of Bahrain or by email at customercare@rovaesim.com

3. Categories, Collection and Usage of Personal Data

3.1 Collection, usage and legal basis

Your data might be collected from you directly, when you access our Platforms, when you use them, when you request our services and when you contact us.

Activity	Personal Data	Purposes and lawful basis of the processing
Platforms access and maintenance	<ul style="list-style-type: none">○ IP address○ Device information○ Pages Viewed	We collect your data to enable users to access and navigate the Platforms, ensuring functionality and network

- Duration Visits
- Site/App Usage
- Access Logs
- User's Operating System

security, to diagnose network and IT issues, to administer the Platform etc..

Lawful Basis:

Art. 6 (1) (b) of GDPR. Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

art. 6 (1) (f) of GDPR, the process is necessary to fulfil our legitimate interests in maintaining the security and proper functioning of our IT systems and platforms, preventing fraud and misuse.

Use of cookies

- Cookie identifiers
 - Browsing behavior
 - Preferences and settings
 - Usage data
 - Analytics data
- As applicable to the relevant cookie(s). Please refer to our Cookies Policy.

We collect your data for the purpose of providing necessary functionalities, enhancing user experience, analytics and marketing.

Lawful Basis:

Art. 6 (1) (f) of GDPR. The processing is necessary for our legitimate interests to provide necessary functionalities on our Site and the App, by allowing strictly necessary cookies.

Article 6(1)(a) of GDPR). Consent for non-essential cookies.

User account registration

- User's contact details (first name, surname, email address and contact number),
- date of birth,
- place of birth,
- nationality,
- occupation,
- gender,
- Country Code
- Copy of ID/Passport
- Facial recognition image
- Account credentials (username and password)
- security questions and answers

We collect your data to create and manage your personal account, to verify your identity, to communicate with you about the account, service updates or issues, to authenticate user login to the Platforms and for API integrations.

Lawful Basis:

Art. 6 (1) (b) of GDPR. Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

Art. 6 (c) processing is necessary for compliance with a legal obligation to which the controller is subject.

Art. 9.2 (a) explicit consent

Purchase and provision of e-service and roaming subscriptions

- Bank details,
- debit or credit card information,
- billing address

We collect your data to enable the purchase and activation of eSIM / data roaming packages, deliver connectivity services, to communicate with you, to

- information about e-wallets, or digital banking mediums as relevant.
- Device model, operating system, IMEI
- IMSI, usage, time stamps and destination
- SIM/eSIM Data ICCID (SIM identifier), IMSI, MSISDN (phone number)
- Usage data including Global Positioning System, roaming destinations, timestamps of usage
- Roaming location

administer billings and payments, to facilitate e-SIM download/delete on mobile, for security and fraud prevention, to protect our customers and secure the Platforms, to review transactions in order to ensure that your use of our service complies with all applicable laws, policies and terms of use.

Lawful Basis:

Art. 6 (1) (b) of GDPR. Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

Art. 6 (1) (f) of GDPR. The processing is necessary for our legitimate interests of conducting our business objectives, including ensuring compliance with applicable laws, policies and terms of use, for security and fraud prevention.

Art. 6 (c) processing is necessary for compliance with a legal obligation to which the controller is subject.

Debt collection

- Full name, date of birth, contact details, contract reference, subscription details.
- Outstanding balances, payment history
- Usage Information

We collect your data to manage the collection of debts arising from contracts with the data subject, to communicate with the data subject regarding outstanding payments and to take legal action if necessary to recover debts.

Lawful Basis

Art. 6 (1) (b) of GDPR. Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

Art. 6 (1) (f) of GDPR. The processing is necessary for our legitimate interests of pursuing legal claims.

When you contact us through the “Contact us” form or through the Support and Live Chat

- Full name
- Email Address
- The content of your mail/message/chat
- Phone number (if required)
- Metadata

We collect your data for the purpose of processing your request, to communicate with you, to provide you with the information you require, to provide support in real time.

Lawful Basis:

Art. 6 (1) (f) of GDPR. The processing is necessary for our legitimate interests of conducting our business objectives, replying to queries, complaints or concerns.

Art. 6 (1) (b) of GDPR. The processing is necessary for the performance of a contract to which you are a party or in order to take steps following your request prior to entering into a contract.

<p>Marketing and Profiling</p>	<ul style="list-style-type: none"> ○ Name, gender, address, phone number, date of birth and email address ○ Telecom usage and behavior ○ Information from cookies and tags placed on your connected devices ○ Information from other organizations such as aggregated demographic data, data brokers, our partners and publicly available sources ○ Details of the products and services you've bought and how you use them ○ Data relating to your interactions with our Platforms. We might also collect data relating to your preferences in receiving marketing /communications (opt in/opt out) and your interaction with any marketing communications delivered to you 	<p>We collect your data to analyze your preferences, interactions, and purchasing behavior to send you targeted promotions and tailored product offerings. In any case, this profiling activity is aimed at better personalizing our services and does not entail legal or other significant effects for you.</p> <p>Lawful Basis: Article 6(1)(a) of GDPR. Consent.</p>
<p>Customer Satisfaction Surveys</p>	<ul style="list-style-type: none"> ○ Identification details (name, surname) ○ contact details ○ demographic data ○ survey response 	<p>To conduct surveys to gather valuable insight and feedback from users, enabling us to have feedback about your experience with us, improve our products and services. Participating to our surveys is voluntary and optional.</p> <p>Lawful Basis: Art. 6 (1) (f) of GDPR. The processing is necessary for our legitimate interests of conducting our business objectives, replying to queries, complaints or concerns.</p>

3.2 Our Legitimate Interest

We may process your data also for our legitimate interest to enforce our legal rights, to prevent and detect fraud, unauthorize activities and access, and/or other misuse; where we believe is necessary to investigate, prevent or take actions regarding illegal activities, suspected fraud, situations involving potential threats to the safety or legal rights of any



person or third party, or violations of our terms of services and other agreements.

We may also process your data when it is necessary to comply with legal and regulatory obligations.

In addition, we may process your data to operate our business, in case of mergers, acquisitions, reorganizations, bankruptcy and other business transactions, to administer and/or plan our accounting, auditing, compliance, recordkeeping activities and legal functions, to exercise or defend legal claims and to pursue any legal remedy available.

Where we process your personal data in reliance on Article 6(1)(f) GDPR, we ensure that our legitimate interest does not override your interests or fundamental rights and freedoms.

3.3 Special Category of Data

As part of the identity verification process to activate our services and in compliance with the legal obligations imposed by Bahrain Telecommunications Regulatory Authority (TRA), we are required to collect your biometric data (facial recognition). This data is used solely to confirm your identity and ensure the security and integrity of our service activation process. We process your biometric data only on the basis of your explicit consent, in accordance with Article 9(2)(a) of GDPR. Your biometric data is not stored on our systems. It is securely transferred to the TRA for verification purposes and processed under their legal mandate.

3.4 Consent

Whenever we process your personal data based on consent, you may withdraw such consent at any time, by contacting us at customer@rovaesim.com. Please note that withdrawing your consent does not impact the lawfulness of the processing that was carried out based on your consent prior to its withdrawal.

3.5 Opting out of receiving Promotional Communications

With your consent, we might process your personal data to carry out marketing activities and send you personalized promotional communications. This includes the analysis of your preferences and interests, in order to develop and deliver marketing communications that are specifically tailored to you.

According to your preferences, we might send you information (about the products and services we provide) by phone, post, email, text message, online banner advertising or a notice using our App.

If you no longer want to receive any promotional messages from us, please refer to the following steps:

- If you use our App, log in to your account and change the settings in the “preferences” page.
- You can also contact us by sending an e-mail to customer@rovaesim.com
- If you receive the marketing by mail, you can press the button “unsubscribe” at the bottom of the mails we sent to you.

If you have opted out of a marketing activity, you may still receive service-related messages (e.g. billing, add-on/service activation, credit limit, expiry of term(s)).

3.6 Cookies

We use website tracking technologies, such as cookies, which are used by site owners or third parties to collect information about you as well as your device for different purposes, in order to enhance your navigation on our Platforms, improve our services’ performance and customize your experience. We might also use this information to collect statistics about the usage of our services. For further information on what cookies are, which cookies we use, how and why we use cookies and how you can change your preferences, please read our Cookie Policy.

3.7 Aggregated and Anonymized Data

We may use any of your personal data to create aggregated and anonymized information. Aggregated and anonymized data refers to information that has been processed to remove or obscure personal identifiers, making it impossible to link the data back to specific individuals. Therefore, nobody can identify you from this information. We use it based on our legitimate interest to:

- continuously improve and develop our network and products and services for our users;
- to understand market trends, improve products or services, gain insights to inform business strategies
- run management and corporate reporting, research and analytics, and to improve the business; and

4. Transfer of Data outside the EEA

To fulfil the objectives outlined in this Notice it may be necessary for us to transfer, store, or process your personal data in countries that may not provide the same level of protection as mandated by the GDPR and where the European Commission has not issued an adequacy decision (Art. 45 GDPR). In such instances, we ensure that the transfer of data is conducted with appropriate safeguards in place, such as the use of EU standard contractual clauses (SCC).

Where we receive requests for personal data from law enforcement or regulators we carefully validate these requests before any personal data is disclosed. You can obtain a copy of the Standard Contractual Clauses (SCCs) by contacting us at data-rep@rovaesim.com.

5. Sharing of Personal Data

We collaborate with various companies through contractual agreements to provide, improve, customize, support, and market our services. While we limit their access to your personal data as much as possible, there may be instances where sharing certain aspects of your personal data is necessary for these companies to assist with our operations. In such cases, third parties will only access or use your data on a strict 'need to know' basis, under our instructions, in compliance with our policies and procedures, and subject to various safeguards. We never share your information for marketing purposes unless you have explicitly consented to such sharing of your data.

We engage third parties for the following services:

- storing, cross-checking, verifying, and updating your personal details;
- installing, delivering, maintaining, and repairing our goods and services;
- providing you with mobile applications you've downloaded and subscribed to, and assessing their usage
- provision of customer care;
- provide customer-service, marketing, infrastructure and information-technology services and content services
- managing information about your use of our goods and services;
- collecting feedback on our performance and customer satisfaction;
- running surveys;
- billing for the services we provide you;
- processing payment transactions;
- following up on debt collection through agencies or recovery organizations; building, maintaining, supporting, and troubleshooting our service and IT networks;
- companies that host or operate the Platforms and the related services, cloud providers and mailing houses.
- Legal advisers and other professionals, accountants, data analysis providers, auditors.
- When allowed or imposed by applicable law and in compliance with legal and regulatory requirements, in the event that we are acquired by or merged with a third-party entity, we reserve the right to disclose and/or transfer to such entities your personal data and any other information that we have collected, including the performance of a due diligence exercise. In the event of bankruptcy or a comparable event initiated by or against us, all such information may be deemed an asset of ours, thereby subject to potential sale or transfer to third parties.
- personalizing our goods and services and make them work better.



- communicating with you on our behalf.

We would like to bring the following matters to your specific attention:

5.1 Sharing Your Personal Data with to run Verification Checks

We use third parties to run identity verifications, checks before we provide you with a product or service (including upgrades or renewals), and in certain situations whilst you are using our products and services. We will need to share your name, address, date of birth, contact details including IP address and other relevant details with such third parties to allow them to carry out the necessary investigations. We do this because we have a legal obligation to verify your identity, and to safeguard our products and services. Please note that our third-party providers do not retain or store your facial image data.

Please be aware that when such agencies receive a request from us, a 'footprint' goes on your file. This may be visible to other organizations.

If you provide us with false or inaccurate information, default on payment or cheques, or otherwise act in a manner which we deem as potentially suspicious or fraudulent, we may pass that information to fraud prevention and law enforcement agencies and other interested parties.

Credit reference and fraud prevention agencies will keep a record of any fraud or money laundering risk and this may result in other organizations refusing to provide services, financing or employment to you. If you have any questions about this, please get in touch with us. You can contact us at customercare@rovaesim.com.

5.2 Sharing Your Personal Data with Debt Collection Agencies

In the event that you default on the payment of amounts due to us for the payment of our services, we may ask a debt collection agency to collect our fees. Your personal details, including your contact information, usage information, the amount due and other information as necessary will be shared with the debt collection agency.

We may choose to sell the debt to another organization to allow us to receive the amount due.

5.3 Sharing Your Personal Data with Law Enforcement Agencies and Regulatory Authorities

We are obliged to share your personal data as necessary with government and law enforcement agencies, such as the police, to help detect and prevent crime, prosecute offenders and protect national security and with other regulatory authorities (e.g. for historical or statistical purposes and/or for scientific research). Before sharing any of your personal data, we would need to be satisfied that a request for information is lawful and proportionate.

5.4 Sharing Your Personal Data due to Legal Related Claims

If you have filed an legal -related or legal claim with or against us, or if we have filed one against or with you, we may share your personal data with relevant parties including our lawyers, consultants, and insurance companies. This information will only be used for the purposes of the claim.

5.5 Sharing Your Personal Data with other Third Parties

- If you call the emergency services, we will give them information about you and where you are, so that they are able to assist you.
- If you are a mobile telephony subscriber roaming on a foreign network, we may share your data with roaming brokers (clearing houses) to bill you for any applicable roaming charges.
- When you use third-party services or platforms via SMS, such as Google or Apple, we may need to share relevant traffic



and billing data with both the third party and other service providers to connect you with your chosen platform.

6. Third-party websites

The Platforms through which the service is provided will, from time to time, contain links to third-party websites or services. Please note that these websites and any services that are accessible through them may allow the third parties to collect or share your personal data but we do not control these third-party websites or services. They may use their own tracking technologies and we have no control over their data practices.

Accordingly, we do not accept any responsibility or liability for their processing or for any personal data that may be collected or shared through these websites or services.

Please check their privacy policies before you submit any personal data to these websites or use these services.

7. Protecting and Retaining Your Personal Data

7.1 How we protect your Personal Data

We prioritize the protection of your personal information by implementing a comprehensive system of organizational and technical security measures. These include data encryption, data anonymization where applicable, and the use of highly secure servers that are protected both electronically and physically. We follow industry-standard practices, such as encryption, firewalls, and role-based access controls, to safeguard your data.

Despite our rigorous efforts, it is important to understand that no method of data transmission over the internet or electronic storage is entirely secure. We cannot guarantee that unauthorized third parties, including hackers or cybercriminals, will not be able to circumvent our security measures and improperly access, steal, or alter your information.

You are responsible for maintaining the security of your account credentials. If you believe that your account or interaction with us has been compromised in any manner, please get in touch with us using the contact details provided in this Notice. To further ensure your safety, we recommend accessing our services only from secure environments.

7.2 How long do we keep your personal information?

We retain your personal data no longer than strictly necessary i) to realize the purpose for which your personal data was originally collected ii) as required by a specific law to which we may be subject and iii) to manage any legal claims in relation to which such data may be required in evidence. Accordingly, to establish retention periods, we consider several factors, including but not limited to any retention period set out by legal or regulatory requirements, the time periods established by law, regulations and directives to exercise legal actions and to defend any rights. Thereafter, personal data shall be immediately and irrevocably erased or anonymized.

We might retain your data for a longer period of time based on our legitimate interest to comply with our legal obligation and record keeping duties, in case of legal proceeding/audit or inspection from authorities or when we are obliged to do so by laws.

The following outlines some specific retention periods for various categories of data:

- **Customer Data:** Retained for up to 5 years after the last interaction (*),
 - **Customer Logs:** Typically retained for 6 months to 2 years (*),
 - **Financial Records:** Typically retained for 7 to 10 years (*),
 - **Marketing Data:** Retained for 2 years from last engagement unless consent is renewed
 - **Email Logs:** Retained for 1 to 3 years (*),
- (* unless contractual or applicable legal obligations require longer storage.

Should you need to know the complete list of the retention periods we adhere to, with respect to the indicated categories of personal data, please get in touch with us at customercare@rovaesim.com.

8. Data Relating to Children

Our website should only be accessible by individuals over the age of sixteen (16). It is a parent's or legal guardian's responsibility to ensure that persons do not use our website. If we have reason to believe that we hold personal data of a person under that age, we will delete it immediately.

9. Automated Decision-Making

We do not rely on any decisions taken solely by automated means (in other words, without significant human intervention) – including any profiling. Should this position change in the future (and only if legally permitted to do so), you will be notified accordingly.

10. Your Rights

At any point in time during our processing of your data, you have the following rights.

Please be aware that the following rights are not absolute and may only be available in specific circumstances.

- **Right to be informed** – you have the right to be informed about the processing of your personal data through this Notice.
- **Right of access** – you can request a copy of the information that we hold about you. Before responding to your request, we are required by law to verify your identity. We may need to ask you to provide additional information to respond to your request. We shall respond to your request as soon as possible and within the timeframe established by law.
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- **Right of rectification** – you can ask us to correct data that we hold about you if it's inaccurate or incomplete.
- **Right to be forgotten** – in some situations, you may ask us to delete certain data we hold about you and we will always comply to the extent allowed or required by any applicable law.
- **Right to restriction of processing** – in some situations, you may ask us to restrict the processing of your data.
- **Right of portability** – you may request to transfer your personal data to you or to a third party. We will provide you, or a third party you have chosen, with your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
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- **Right to object** – where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to the processing of your data on this ground as you feel it impacts on your fundamental rights and freedoms, you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – you also have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.
- **Right to complain about how your personal data is being processed by us (or third parties), or about how your complaint has been handled** - you can lodge a complaint directly with us, by contacting us at data-rep@rovaesim.com.
- You can also lodge a complaint with the relevant supervisory authority. Since our GDPR Representative is located in Malta, the competent supervisory authority is:
Office of the Information and Data Protection Commissioner (IDPC)
Floor 2, Airways House, High Street, Sliema, SLM 1549, Malta
Website: <https://idpc.org.mt>
Email: idpc.info@idpc.org.mt

You can also file a complaint with the data protection authority in your own country - where you reside, where you work, or where the alleged violation occurred.

If you are not located in EU, you can lodge a complaint with the Bahrain Personal Data Protection Authority (PDPA) on <http://www.pdp.gov.bh/en/contact.html>.

Right To Withdraw – you have the right to withdraw your consent, where given, at any time. This applies also for marketing communications, where you are able to opt-out of receiving further notifications, as indicated above. However, please note that this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may



not be able to provide certain products or services to you. If you wish to exercise your rights or if you have any questions, you can directly contact us at data-rep@rovaesim.com.

We respond to legitimate requests within timeframe set by law. Occasionally it may take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

There is no charge for the provision of this information except in circumstances where the request is manifestly unfounded or excessive.

Following your request, we may retain your personal data in accordance with applicable laws and regulations for record-keeping purposes. Should you request the deletion or modification of your personal data, we will securely maintain records to document such actions as required by law or our legitimate interest to comply with the Regulation and the accountability principle.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us

11. Further processing

Where we need to further process your personal data for a purpose other than that for which your personal data has been collected, we will provide you, prior to the commencement of the further processing, with any relevant information.

12. Changes to this Notice

We keep our Notice under regular review, and we may make changes from time to time. If we do, changes will be posted in this document and notified in advance to you by email or before you next start using the Platforms.