Privacy Policy

Effective date: 21 April 2026 Last updated: 21 April 2026

Welcome to What Network, operated by Streetwave Ltd ("Streetwave", "What Network", "we", "us" or "our").

Streetwave respects your privacy and is committed to protecting your personal data. This privacy policy explains how we collect and use your personal data when you visit **whatnetwork.co.uk** (the "Site"), interact with us, sign up to our newsletter or get in touch, and tells you about your privacy rights and how the law protects you.

Please use the Glossary in section 15 to understand the meaning of any terms used in this policy.

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1. About this policy and who we are

1.1 Purpose of this policy

This policy tells you how we collect and process personal data through your use of the Site, whether you are simply browsing mobile network deals, signing up to our newsletter, or contacting us.

The Site is a mobile network price comparison service. It is **not** intended for children under the age of 16 and we do not knowingly collect personal data relating to children. If you are under 16, please do not use the Site or provide us with any personal data.

You should read this policy together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data.

1.2 Who we are (the controller)

Streetwave Ltd is the controller responsible for the personal data processed by What Network as described in this policy.

- **Legal entity:** Streetwave Ltd (registered in England & Wales)
- **Trading name for this Site:** What Network
- **Registered office:** Wesley Clover Innovation Centre, Coldra Woods, Chepstow Road, Newport, Wales, NP18 2YB
- **ICO registration number:** Streetwave Ltd is registered with the Information Commissioner's Office. Our registration number will be added to this policy once issued by the ICO.

We have not appointed a Data Protection Officer because we are not required to do so under UK GDPR Article 37. Privacy queries should be directed to the contact details below.

Please note: the comparison technology that powers our deal listings is operated by Stickee Technology Limited, who also maintain their own privacy policy that governs the personal data they collect and process

when you interact with the comparison engine. See section 2.2 below.

1.3 Contact details

If you have any questions about this privacy policy, want to exercise any of your rights, or have a privacy concern, please contact us:

- **Privacy contact:** George Gibson
- **Email:** info@streetwave.co
- **Post:** Streetwave Ltd (Privacy), Wesley Clover Innovation Centre, Coldra Woods, Chepstow Road, Newport, Wales, NP18 2YB

You have the right to complain to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk or telephone 0303 123 1113). We would, however, appreciate the chance to resolve your concerns before you approach the ICO, so please contact us first — see section 14 on our complaints procedure.

1.4 Changes to this privacy policy

We keep this privacy policy under regular review. This version is dated at the top of this document. We will update the date when we make any material changes. Historic versions are available on request.

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.

1.5 Third-party links

The Site features and links to deals from third-party mobile network operators (such as EE, Vodafone, O2, Three, iD Mobile, Smarty, Lebara and others) and may contain links to third-party websites, plug-ins and applications. **When you click on a deal or other link that takes you off the Site, you leave our service.** We do not control those third-party sites and are not responsible for their privacy practices. We encourage you to read the privacy policy of every website you visit.

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2. How the Site works — and who processes your data

We want to be transparent about the data flow behind What Network, because a price comparison site involves several parties.

2.1 What we do

What Network is a mobile network price comparison service. We display SIM-only, pay-monthly, and pay-as-you-go mobile deals from UK networks so you can compare them side-by-side, read guides and pick the right network for your needs. **We do not sell mobile contracts ourselves.** When you click a deal, you are taken through to the mobile network's own website (or in some cases an affiliate redirect) to complete the purchase directly with that network.

2.2 Stickee (comparison technology provider)

We use **Stickee Technology Limited** ("Stickee") as our white-label comparison technology provider. Stickee supplies the deal data feeds, pricing engine, click-routing and affiliate-attribution infrastructure that powers the deal listings on the Site. When you click a deal on the Site, Stickee handles the outbound redirect and attribution so that the mobile network can credit What Network for referring you.

- **Legal entity:** Stickee Technology Limited (Company No. 06711740, registered in England & Wales)
- **Registered office:** 2 The Pavilions, Cranmore Drive, Solihull, B90 4SB
- **Data Protection Officer:** Karl Binder, hello@stickee.co.uk
- **Stickee's privacy policy:** https://stickee.co.uk/privacy-policy

Where Stickee processes personal data on our behalf in connection with the Site (for example, technical logs generated by the comparison tool, or aggregate data about which deals are viewed), they do so as our **data processor** under a written Data Processing Agreement and only on our documented instructions.

Stickee also operates its own infrastructure to run the comparison engine, to manage its own direct relationships with the mobile networks, and to operate its outbound click-tracking and affiliate-attribution service (including its relationships with third-party affiliate networks — see section 2.3). Where Stickee processes data for those purposes (for example, platform-wide analytics on deal performance across its customer base, or operating the affiliate-tracking chain at the point of an outbound click), Stickee acts as an **independent controller** in its own right. In that capacity, Stickee's own privacy policy governs how it handles that data.

2.3 Awin (Stickee's affiliate network)

Stickee uses **Awin Limited** ("Awin") as an affiliate network to attribute outbound click-throughs and conversions. What Network does not have a direct contractual relationship with Awin — Awin is engaged by Stickee as part of Stickee's service to us. When you click an outbound deal, the redirect may pass through Awin's infrastructure (on Awin's own domain) so that the referral can be attributed.

- **Legal entity:** Awin Limited (Company No. 06235192, registered in England & Wales)
- **Registered office:** 3 Pancras Square, London, N1C 4AG
- **Awin's privacy policy:** https://www.awin.com/gb/legal/privacy-policy

In its affiliate-tracking role, Awin acts as an **independent controller** on its own domain. Any tracking cookies or similar identifiers Awin sets in order to attribute a conversion are set on Awin's own domain after you leave the Site, and are governed by Awin's privacy policy and PECR compliance — not ours. If you want to understand exactly how Awin tracks affiliate clicks, please read Awin's privacy policy.

2.4 Mobile network operators

Once you click through to a mobile network's own site and begin a purchase journey, **that network becomes the data controller** for the personal data you provide to them (name, address, payment details, identity checks, etc.). Their own privacy policies apply from that point onward.

2.5 Rybbit (privacy-first analytics)

We use **Rybbit** as our web analytics platform. Rybbit is a cookieless, privacy-friendly analytics tool hosted in the European Union (Hetzner, Germany). Rybbit does not set cookies on your device, does not use cross-site tracking, does not create persistent identifiers, and does not store raw IP addresses. Data is aggregated for

site-traffic analysis only. Where Rybbit processes personal data on our behalf, they do so as our **data processor** under their Data Processing Agreement. For more information see rybbit.com/privacy and rybbit.com/dpa.

2.6 Our own backend (AWS UK)

Alongside the comparison widget, the Site provides a number of Streetwave-built features — the postcode-based network-recommendation tool, the "vote for data in my area" tool, the notify-me email signup, and **Map the Gap** (our community coverage-gap reporting tool). All of the data collected through these features is stored on our own backend, hosted in the **United Kingdom region of Amazon Web Services (AWS)**. Stickee is **not** involved in this data flow and does not receive the postcode, coverage, vote, notify-me, or Map the Gap data. We are the sole controller and processor for this data.

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3. The data we collect about you

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been permanently removed (anonymous data).

We designed What Network to collect as little **identifiable** personal data as possible, and we anonymise data wherever we can. But because the Site offers coverage-lookup, community-reporting and notification features, we do process more data than a plain comparison table would — and we want to be fully transparent about it.

We may collect, use, store and transfer the following categories of personal data about you:

- **Identity Data:** first name and last name (only if you contact us or sign up to our newsletter and choose to provide it).
- **Contact Data:** email address (and, where you provide it, telephone number or postal address). We ask for email **only** where it is needed to deliver a feature you have asked for — specifically, the newsletter, the notify-me-when-data-arrives feature, and any reply to a contact enquiry.
- **Communications Data:** the content of any enquiry, message, or feedback you send to us.
- **Marketing and Communications Data:** your preferences in receiving marketing from us and your communication preferences (e.g. subscribed / unsubscribed status).
- **Location Data:** the postcode(s) you enter into the Site's lookup tools, the "vote for data in my area" tool, the notify-me tool, or Map the Gap. We treat postcode as personal data because it can, in combination with other data, identify you or your household.
- **Network and Coverage Data:** which mobile network you tell us you currently use, and which network our tools recommended as the best match for the postcode(s) you entered.
- **Community Service-Quality Data (Map the Gap):** the issue you report through Map the Gap — the type of problem, the postcode, the date/time it occurred.
- **Civic Engagement Data:** any vote you cast to request that data is collected in a particular area (anonymous), and any email address you supply to be notified if data later becomes available.
- **Click and Referral Data:** which deal you clicked on and which destination website (e.g. a mobile network's own site) you were sent to, linked to a session identifier for affiliate attribution (see sections 2.3 and 5).

- **Technical Data:** limited technical information about your visit collected by Rybbit — such as approximate country/region (derived from your IP address at the time of the request, then discarded), browser type, device type, operating system, referring URL and pages viewed. This data is not linked to you as an individual.
- **Usage Data:** aggregated information about how visitors use the Site (e.g. which comparison pages are most viewed, which postcodes are looked up most often).

We also use **Aggregated Data** (statistical or demographic summaries) for the operation of the Site. This may be derived from your personal data but is not treated as personal data because it does not directly or indirectly identify you.

We do not:

- operate user accounts or logins
- process any payments on the Site
- collect Financial Data (bank or card details)
- knowingly collect Special Category Data (see section 3.2 below)
- collect data about criminal convictions or offences

3.1 If you don't give us your data

Most of the Site works without you providing any identifiable personal data. You can browse and compare deals, look up the best network for a postcode, and cast an anonymous vote, all without giving us an email address or name. You only need to share identifying personal data if you choose to:

- sign up to our newsletter;
- sign up to be notified if data arrives in your area;
- submit a contact / enquiry form;
- voluntarily include contact details in a Map the Gap report.

3.2 Please do not submit Special Category Data

Please do not include any Special Category Data in the free-text description or review. Special Category Data includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, and data concerning health, sex life, or sexual orientation — and, in the UK, information about criminal convictions or offences.

For example, please do not write things like "I couldn't call my therapist," "I missed a hospital appointment," "I was trying to contact a domestic violence helpline," or other descriptions that reveal sensitive information about you or others.

If you believe any of our features contain sensitive information about you or another person, please contact us (see section 1.3) and we will remove or anonymise it without undue delay. We reserve the right to remove, anonymise or delete any Map the Gap submission that in our reasonable view contains Special Category Data.

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4. How your personal data is collected

We use the following methods to collect data:

- **Direct interactions.** You give us Identity, Contact, Communications, Location, Network, Community Service-Quality, and Civic Engagement Data when you:
  - sign up to our newsletter or marketing updates;
  - use the postcode-based best-network lookup tool;
  - cast an anonymous vote for data to be collected in a particular area;
  - supply your email address to be notified if data later arrives in your area;
  - submit a Map the Gap coverage-gap report (and optionally provide contact details);
  - fill in a contact or enquiry form on the Site;
  - email us, or otherwise correspond with us (e.g. via social media).
- **Automated technologies.** As you interact with the Site, we collect limited, non-identifying **Technical Data** and **Usage Data** via Rybbit analytics (see section 2.5). This does **not** involve cookies or persistent identifiers.
- **Click and referral logging.** When you click an outbound deal, we log the deal clicked and the destination website (e.g. vodafone.co.uk) on our own backend for analytics and affiliate reporting.
- **Affiliate click tracking.** When you click an outbound deal, the redirect may pass through Stickee's and Awin's infrastructure on their own domains, where they may set affiliate tracking identifiers under their own privacy policies so the mobile network can credit us for the referral. See sections 2.3 and 5.
- **Third parties and publicly available sources.** We may receive aggregated or pseudonymised reporting data from Stickee (about deal performance) and from Awin (about affiliate click attribution and conversions). Awin may share back limited conversion information for commission-tracking purposes.

5. Cookies and similar technologies

What Network does not set cookies on your device when you use whatnetwork.co.uk. We have deliberately chosen a first-party, privacy-friendly architecture for the Site:

- **Rybbit analytics is cookieless and storage-less** — it does not set cookies, does not use localStorage or sessionStorage, and does not create persistent identifiers (see section 2.5).
- **We do not run Google Analytics, Google Ads tags, Meta Pixel, TikTok pixel or any similar third-party marketing or advertising tags** on whatnetwork.co.uk.
- **We do not use advertising cookies, re-targeting cookies, cross-site tracking cookies, or affiliate tracking cookies on whatnetwork.co.uk.**
- **We do not embed third-party fonts, social-media share widgets or video players that would set cookies** on whatnetwork.co.uk.

For these reasons, we do not ask for cookie consent on whatnetwork.co.uk — there is nothing for you to consent to, because nothing is being stored on or read from your device in connection with your use of the Site.

5.1 What happens when you click an outbound deal

When you click a deal on the Site, you are handed off to **Stickee's** click-routing and affiliate-attribution infrastructure (see section 2.2), which may in turn pass you through **Awin's** redirect chain (see section 2.3) on its way to the mobile network's own website. Cookies and similar tracking identifiers may be set during that redirect chain — but those cookies are set by Stickee, by Awin, or by the destination mobile network, **on their own domains**, under their own privacy policies and their own PECR-consent arrangements. They are not set by whatnetwork.co.uk.

If you want to understand exactly what Stickee, Awin or a particular mobile network store on your device when you click through, please consult their own privacy and cookie notices:

- Stickee: https://stickee.co.uk/privacy-policy
- Awin: https://www.awin.com/gb/legal/privacy-policy
- The mobile network you are clicking through to — see their website.

5.2 Browser-level controls

You can further limit tracking across the web, including during the outbound redirect chain, by:

- setting your browser to block third-party cookies;
- using private / incognito mode;
- using tracking-protection features built into Safari, Firefox, Brave and other browsers;
- using the Global Privacy Control (GPC) signal where your browser supports it.

These are browser-level settings and apply to all websites you visit, not just What Network.

5.3 If this changes in the future

If we ever add any cookie, local-storage entry, or similar technology to whatnetwork.co.uk — whether strictly necessary (e.g. security) or non-essential (e.g. analytics, advertising, embedded media) — we will update this policy and, where consent is required by PECR (as amended by the Data (Use and Access) Act 2025), put in place a compliant consent mechanism before the change goes live.

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6. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will rely on the following lawful bases:

- **Consent** — where you have given us clear, opt-in consent (e.g. to receive our newsletter).
- **Legitimate interests** — where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (e.g. responding to an enquiry, running analytics).
- **Legal obligation** — where we need to comply with a legal or regulatory obligation.
- **Performance of a contract** — where necessary to perform a contract we have entered into with you.

See the Glossary in section 15 for more detail on each lawful basis.

6.1 Purposes for which we use your personal data

Purpose / Activity	Type of data	Lawful basis
To send you our newsletter and marketing emails about mobile deals, guides and Site updates	(a) Identity (b) Contact (c) Marketing and Communications	Consent (you have opted in)
To respond to an enquiry, support request or feedback you send us	(a) Identity (b) Contact (c) Communications	(a) Legitimate interests (to respond to customer queries and improve our service) (b) Consent, where you have specifically asked us to contact you
To run the postcode-based best-network lookup tool and show you which network we think best serves your area	(a) Location (b) Network and Coverage	Legitimate interests (to provide the free lookup service you have asked for and to build a useful community dataset on UK mobile coverage)
To accept and count votes from users requesting that coverage data be gathered for a particular area	(a) Location (the postcode only — we do not tie this to you)	Legitimate interests (to identify community demand for data collection in particular areas)
To email you when coverage data later arrives in an area you asked to be notified about	(a) Contact (email) (b) Location (the postcode you registered)	Consent (you have asked us to contact you for this specific purpose)
To accept, store and publish Map the Gap community coverage-gap reports, and to review and remove submissions that contain Special Category Data	(a) Location (b) Network and Coverage (c) Community Service-Quality Data	Legitimate interests (to operate a community feature that identifies real-world mobile coverage problems for the public benefit, and to ensure we do not retain Special Category Data)
To log outbound deal clicks (which deal, which destination website) on our own backend for analytics and affiliate reporting	(a) Click and Referral Data (b) Technical	Legitimate interests (to understand referral performance and run our business)
To hand off outbound clicks to Stickee and its affiliate partners (including Awin) for click-routing and conversion attribution on their own infrastructure	Click and Referral Data	Legitimate interests (to operate our commercial referral arrangement with Stickee so the mobile networks credit What Network for the referral). Any cookies Stickee or Awin set are set on their own domains under their own privacy policies and PECR compliance

Purpose / Activity	Type of data	Lawful basis
To manage our relationship with you, including notifying you about changes to our terms or this privacy policy	(a) Identity (b) Contact (c) Marketing and Communications	(a) Legitimate interests (to keep our records up-to-date) (b) Legal obligation
To operate, maintain, troubleshoot and secure the Site (technical administration, bug-fixing, abuse prevention)	(a) Technical (b) Usage	(a) Legitimate interests (to run and protect our business and Site) (b) Legal obligation
To understand how visitors use the Site in aggregate (analytics via Rybbit)	(a) Technical (b) Usage	Legitimate interests (to improve the Site, our content and our products)
To measure the effectiveness of our affiliate and marketing activity (working with Awin, Stickee and the mobile networks)	(a) Technical (b) Usage	Legitimate interests (to understand referral performance and run our business)
To comply with legal, regulatory or tax obligations	(a) Identity (b) Contact (c) Communications	Legal obligation

We may process your personal data for more than one lawful basis depending on the specific purpose. Please contact us if you need details about the specific legal basis we are relying on.

6.2 Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose. If you wish to get an explanation of how processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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7. Marketing

7.1 Newsletter and marketing emails

You will only receive marketing emails from us if you have **expressly opted in** — for example by ticking an unticked subscribe box on the Site, entering your email into our newsletter signup, or asking us to keep you informed.

7.2 Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for their own marketing purposes. We do not currently share your details with any third party for third-party marketing.

7.3 Your absolute right to opt out of direct marketing

You have an **absolute right under Article 21(2) UK GDPR to object at any time** to the processing of your personal data for direct marketing purposes. If you object, we will stop processing your personal data for that purpose immediately and without question.

You can withdraw consent, object to marketing, or unsubscribe at any time by:

- clicking the "unsubscribe" link in any marketing email we send you; or
- emailing us at info@streetwave.co with the subject line "Unsubscribe".

Opting out of marketing will not affect personal data we have processed for other purposes (for example, if you have contacted us with an enquiry), and will not affect the lawfulness of any marketing carried out before you opted out.

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8. Automated decision-making, profiling and automated processing on the Site

We do **not** make decisions about you using purely automated means that produce legal or similarly significant effects within the meaning of Article 22 UK GDPR (as amended by the Data (Use and Access) Act 2025).

However, we do use some automated processing to run the Site, and we want to explain exactly what it does and doesn't do.

8.1 How the Site ranks deals

For transparency, here is how deal ranking on the Site works:

- The underlying data comes from Stickee's comparison feeds, which aggregate deals from the mobile network operators featured on the Site.
- Deals are filtered and sorted by the criteria you choose (e.g. data allowance, monthly price, contract length, handset, network).
- By default, deals may be ordered by a combination of factors including price, data allowance, popularity, and recency. Some deals are commercial arrangements between Stickee, Awin and the mobile networks, which can affect visibility and ordering.
- Any personalisation on the Site is limited to **non-identifying session preferences** (e.g. what you searched for in the current session) and does **not** profile you as an individual, use your browsing history, or use any Special Category Data.

We do not use your personal data to change the price, availability or ranking of deals for you individually.

8.2 Postcode-based best-network lookup

When you enter a postcode into the lookup tool, we use a **deterministic rules-based lookup** (not AI, not profiling) over publicly-available coverage data plus our own community data to return a suggested "best" network for that location. This tool does not make a legal or similarly significant decision about you; it simply provides information.

8.3 Changes in future

If we ever introduce any automated decision-making that produces legal or similarly significant effects for you (for example, individualised pricing based on a profile of you), we will update this policy in advance, clearly explain the logic involved, describe the significance and envisaged consequences for you, and tell you how you can request human intervention, express your point of view, or contest the decision.

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9. Who we share your personal data with

We may share your personal data with the following categories of recipient, strictly for the purposes described in this policy:

- **Stickee Technology Limited** — our comparison technology provider (data processor).
- **Awin Limited** — Stickee's affiliate network, used as part of Stickee's outbound click-handling service. Awin acts as an independent controller on its own domain.
- **Rybbit** — our analytics provider (data processor, EU-hosted).
- **Our email marketing provider** — a reputable third-party platform we use to send our newsletter and manage subscriber preferences. They act as our data processor under a written Data Processing Agreement.
- **Our CRM provider** — a reputable third-party platform we use to manage enquiries and contact-form submissions. They act as our data processor under a written Data Processing Agreement.
- **Professional advisers** — including lawyers, accountants, auditors, and insurers who provide consultancy, banking, legal, insurance and accounting services.
- **HM Revenue & Customs, regulators and other authorities** — where we are required to by law.
- **Other third parties** — in the event of a sale, restructure or merger of our business, in which case we may share your personal data with the prospective buyer or new owner, under strict confidentiality obligations.

We require all data processors to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes — they may only process your personal data for specified purposes and in accordance with our instructions.

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10. International transfers

Where possible, your personal data stays within the UK or EEA:

- **Streetwave's own backend (including Location, Network, Community Service-Quality, Civic Engagement and Click and Referral Data):** hosted on **Amazon Web Services in the United Kingdom region**. No Streetwave-backend data is transferred outside the UK in the ordinary course of operation.

- **Rybbit analytics:** processed in the EU (Germany) — the UK Government has confirmed that the EEA provides an adequate level of protection for personal data, so no additional safeguards are required.

Some of our third-party providers may transfer data outside the UK and EEA (typically to the United States). Where this happens, we rely on one or more of the following safeguards required by UK data protection law:

- the UK Government's adequacy decision for the country in question;
- the UK International Data Transfer Agreement or the International Data Transfer Addendum to the EU Standard Contractual Clauses; or
- the UK–US Data Bridge (where the provider is certified under the Data Privacy Framework).

Where any of our third-party processors transfer personal data outside the UK and EEA, we ensure that one of the safeguards listed above is in place before the transfer occurs. You can request further details of the international transfers relevant to your personal data by contacting us using the details in section 1.3.

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11. Data security

We have put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used, accessed, altered or disclosed in an unauthorised way. These include access controls, encryption in transit (HTTPS/TLS), limiting access to personal data to employees, agents, contractors and third parties who have a business need to know, and requiring them to process personal data only on our instructions and subject to a duty of confidentiality.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator (including the ICO) of a breach where we are legally required to do so.

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12. Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including to satisfy any legal, regulatory, tax, accounting or reporting requirements. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm, the purposes for which we process it, and whether we can achieve those purposes through other means.

Our standard retention periods are:

Data	Retention
Newsletter signup (email, preferences)	Until you unsubscribe, then retained indefinitely on a suppression list (email address only, for the sole purpose of honouring your opt-out and not re-contacting you)
Contact / enquiry form submissions	24 months after the last interaction, unless a longer period is required for legal reasons

Data	Retention
Postcode-lookup records (which postcodes were looked up, which network was recommended)	Stored in anonymised / aggregate form — no user identifier is kept alongside the postcode. Retained indefinitely as part of the community coverage dataset
Votes cast in the "vote for data in my area" tool	Anonymous by design (postcode + vote only). Retained indefinitely as part of the community coverage dataset
Notify-me signups (email + postcode)	Kept until the earliest of: (a) 30 days after we have notified you that data is available in your area; (b) 3 years from the date you signed up; or (c) the date you ask us to remove you. Our market cycle for new coverage data can take up to 3 years, which is why we retain signups for this period — after that we can no longer usefully notify you, so we delete your record
Map the Gap reports (postcode, network, issue, date/time)	Stored without a user identifier unless you voluntarily provide contact details. Retained indefinitely as community data. Any Special Category Data that we become aware of (whether identified by us or reported to us) is deleted without undue delay
Contact details voluntarily supplied in a Map the Gap report	Kept only for as long as needed to follow up with you, and in any event no longer than 24 months
Click and referral logs (deal clicked, destination website, session token)	13 months from the click, then automatically deleted
Rybbit analytics data	Up to 12 months (Rybbit Cloud default), then automatically deleted
Awin affiliate click / conversion logs	Held by Awin as independent controller, in line with Awin's own retention schedule (see Awin's privacy policy)
Records we are legally required to keep for tax and accounting purposes	6 years from the end of the relevant financial year (Companies Act 2006 and HMRC rules)
Records of complaints and Subject Access Requests	3 years after the matter is closed

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

You can ask us to delete your data in the circumstances set out in section 13 of this policy (your legal rights — erasure).

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13. Your legal rights

Under UK data protection law, you have the following rights in relation to your personal data:

- **Right of access** — to request a copy of the personal data we hold about you (commonly known as a "subject access request").
- **Right of rectification** — to ask us to correct any inaccurate or incomplete data.
- **Right of erasure** ("right to be forgotten") — to ask us to delete personal data where there is no good reason for us to keep processing it.
- **Right to object to direct marketing (absolute right)** — under Article 21(2) UK GDPR you have an unconditional right to object to the processing of your personal data for direct marketing purposes. If you exercise it, we will stop immediately.
- **Right to object to other processing** — you can object to processing based on our legitimate interests on grounds relating to your particular situation, and we must stop unless we can demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or the processing is needed to establish, exercise or defend legal claims.
- **Right to restriction** — to ask us to suspend processing in certain circumstances, including while we verify accuracy.
- **Right to data portability** — to receive your personal data in a structured, commonly used, machine-readable format, or to have it transmitted to another controller (applies only where we process data on the basis of consent or to perform a contract, and by automated means).
- **Right to withdraw consent** — where we rely on consent, you can withdraw it at any time (without affecting the lawfulness of processing before withdrawal).
- **Rights in relation to automated decision-making** — as set out in section 8 above, we do not carry out this kind of processing; if that ever changes, you will have the right not to be subject to purely automated decisions with legal or similarly significant effects.

No fee is usually required — you will not have to pay a fee to access your personal data or exercise any of your other rights. However, we may charge a reasonable fee, or refuse to comply, if your request is clearly unfounded, repetitive or excessive.

What we may need from you — we may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

Time limit to respond — we try to respond to all legitimate requests within one calendar month. Occasionally it could take us longer if your request is particularly complex or you have made a number of requests; in that case we will notify you and keep you updated.

To exercise any of these rights, please contact us using the details in section 1.3.

13.1 Erasing or editing a Map the Gap report

If you want a Map the Gap report taken down — whether or not you voluntarily attached contact details to it — please email us at info@streetwave.co with enough detail for us to identify the report (e.g. postcode, date, and rough time of submission). We will remove or anonymise the report without undue delay.

Because most Map the Gap reports are held without any user identifier, we may not be able to prove that a report was yours — but we will still action any reasonable takedown request in good faith.

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14. Complaints

If you are unhappy with how we have handled your personal data, please tell us first so we have the opportunity to put things right.

14.1 How to complain to us

- **Email:** info@streetwave.co (please put "Privacy Complaint" in the subject line)
- **Post:** Streetwave Ltd (Privacy Complaint), Wesley Clover Innovation Centre, Coldra Woods, Chepstow Road, Newport, Wales, NP18 2YB

We will handle your complaint in line with the new data-protection complaints duty introduced by the **Data (Use and Access) Act 2025** (the complaints procedure is in force from 19 June 2026). In particular we will:

1. **Acknowledge your complaint within 30 days** of receipt (the statutory timeframe set by the DUAA), confirming we have it and how we will respond.
2. Investigate the issue fairly and transparently.
3. Respond to you substantively **without undue delay and within one month** of receipt wherever possible. If your complaint is particularly complex or you have made a number of requests, we may extend this by up to a further two months and we will tell you within the first month if so.

14.2 Complaining to the ICO

You also have the right to complain directly to the Information Commissioner's Office (ICO), the UK regulator for data protection:

- **Website:** www.ico.org.uk/make-a-complaint
- **Helpline:** 0303 123 1113
- **Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Under the Data (Use and Access) Act 2025, before complaining to the ICO you must usually first give the controller (us) an opportunity to resolve the complaint. We would always appreciate the chance to respond first, but nothing in this policy affects your statutory right to complain to the ICO.

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15. Glossary

15.1 Lawful bases

- **Consent** means processing your personal data where you have given a clear, specific, freely given and informed indication (by a statement or clear affirmative action) that you agree to the processing. You can withdraw consent at any time.
- **Legitimate interest** means the interest of our business in conducting and managing our business so we can give you the best service and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. You can obtain further information about how we assess our legitimate interests for specific activities by contacting us.
- **Performance of contract** means processing your data where it is necessary for the performance of a contract to which you are a party, or to take steps at your request before entering into such a contract.
- **Legal obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

15.2 Key parties

- **Controller** — the organisation that determines the purposes and means of processing personal data. Streetwave Ltd is the controller for What Network.
- **Processor** — an organisation that processes personal data on behalf of a controller, under a contract. Rybbit acts as our processor. Stickee acts as our processor in relation to personal data processed on our documented instructions for the Site.
- **Independent controller** — an organisation that determines its own purposes and means of processing the same data (for its own reasons). Stickee may act as an independent controller where it processes data for its own purposes (e.g. its own platform analytics, its direct relationships with mobile networks, and operating its outbound click-routing and affiliate-attribution chain). Awin (engaged by Stickee) acts as an independent controller for its own affiliate-tracking activities on its own domain.
- **Mobile network operator** — the provider (e.g. EE, Vodafone, O2, Three, iD Mobile, Smarty, Lebara) who sells you the mobile contract. Once you click through to their site, they become the controller for the personal data you share with them.

15.3 Key laws referenced

- **UK GDPR** — the UK General Data Protection Regulation.
- **Data Protection Act 2018** — the UK law that sits alongside the UK GDPR.
- **Data (Use and Access) Act 2025 (DUAA)** — the 2025 Act that amended the UK GDPR, Data Protection Act 2018 and PECR, with most provisions in force from 5 February 2026 and the mandatory complaints process in force from 19 June 2026.
- **PECR** — the Privacy and Electronic Communications Regulations 2003, which govern electronic marketing, cookies and similar technologies.

This privacy policy was prepared in April 2026. If you would like a prior version of this policy, or you have any questions about how we handle your personal data, please contact us using the details in section 1.3.