

# **BTT Website Privacy Notice**

**Berwick-upon-Tweed Telecommunications Limited** ("BTT" or "We") respect your privacy and commit to protecting it through our compliance with the practices described in this notice.

This notice describes our practices for collecting, using, maintaining, protecting, and disclosing the personal data we may collect from you or that you may provide when you visit our websites, or other digital properties, communications, or forms that link or refer to this notice (our "Website"). This notice applies to the personal data collected through our Website, regardless of the country where you are located.

The Website may include links to third-party websites, plug-ins, services, social networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. We do not control these third-party websites, and we encourage you to read the privacy notice of every website you visit.

Please read this notice carefully to understand our policies and practices for processing and storing your personal data. By engaging with our Website, you accept and consent to the practices described in this notice. This notice may change from time to time (see Changes to Our Privacy Notice). Your continued engagement with our Website after any such revisions indicates that you accept and consent to them, so please check the notice periodically for updates.

# **Data We May Collect About You**

We collect and use different types of data from and about you including:

- Personal data that we could reasonably use to directly or indirectly identify you, such as your name, postal address, email address, telephone number, user name or other similar identifier, or any other identifier we may use to contact you online or offline ("personal data").
- Non-personal data that does not directly or indirectly reveal your identity or directly relate to an identified individual, such as demographic information, statistics, or aggregated information. Statistical or aggregated data does not directly identify a specific person, but we may derive non-personal statistical or aggregated data from



- personal data. For example, we may aggregate personal data to calculate the percentage of users accessing a specific Website feature.
- Technical information, including the full Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, or operating system and platform.
- Non-personal details about your Website interactions, including the full Uniform
  Resource Locators (URLs), clickstream information to, through, and from our Website
  (including date and time), products viewed or searched for; page response times,
  download errors, length of visits to certain pages, page interaction information (such as
  scrolling, clicks, and mouse-overs), or methods used to browse away from the page.

If we combine or connect non-personal, demographic, or technical data with personal data so that it directly or indirectly identifies an individual, we treat the combined information as personal data.

## **How We Collect Data About You**

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us information about you by filling in forms or by corresponding with us by phone, email or otherwise. This includes information you provide when you create an account, subscribe to our service, search for a product, place an order, contact our customer service team, and when you report a problem with our Website.
- Automated technologies or interactions. As you interact with our Website, we may automatically collect technical data about your equipment, browsing actions and patterns as specified above. We collect this information by using cookies, server logs, and other similar technologies (see Cookies and Automatic Data Collection Technologies).
- Third parties or publicly available sources. We may receive information about you from third parties including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies, data brokers, or aggregators.
- User contributions. You also may provide information for us to publish or display ("post") on public Website areas or transmit to other Website users or third parties (collectively,



"User Contributions"). You submit User Contributions for posting and transmission to others at your own risk. Although, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of any Website users with whom you choose to share your User Contributions. Therefore, we cannot and do not quarantee that unauthorised persons will not view your User Contributions.

### **Cookies and Automatic Data Collection Technologies**

Our Website uses cookies (small files placed on your device) or other automatic data collection technologies to distinguish you from other Website users. This helps us deliver a better and more personalised service when you browse our Website. It also allows us to improve our Website by enabling us to:

- Estimate our audience size and usage patterns.
- Store your preferences so we may customise our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, certain parts of our Website may become inaccessible and certain features may not work correctly. Unless you adjust your browser settings to refuse cookies, our system will issue them.

Our Website pages and emails may contain web beacons (small transparent embedded images or objects, also known as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count website page visitors or email readers, or to compile other similar statistics such as recording Website content popularity or verifying system and server integrity.

### Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the Website are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. They may associate the information collected with your personal data or they may collect information,



including personal data, about your online activities over time and across different websites or other online services. They may use this information to provide you with interest-based (behavioural) advertising or other targeted content.

We do not control how these third-party tracking technologies operate or how they may use the collected data. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see Your Personal Data Use Choices.

### **How We Use Your Personal Data**

We use your personal data to provide you with products, offer you services, communicate with you, deliver advertising and marketing, or to conduct other business operations, such as using data to improve and personalise your experiences. Examples of how we may use the personal data we collect include to:

- Present our Website and provide you with the information, products, services, and support that you request from us.
- Meet our obligations and enforce our rights arising from any contracts with you, including for billing or collections, or comply with legal requirements.
- Fulfil the purposes for which you provided the data or that were described when it was collected.
- Notify you about changes to our Website, products, or services.
- Ensure that we present our Website content in the most effective manner for you and for your computer.
- Administer our Website and conduct internal operations, including for troubleshooting, data analysis, testing, research, statistical, and survey purposes.
- Improve our Website, products or services, marketing, or customer relationships and experiences.
- Enable your participation in our Website's interactive, social media, or other similar features.
- Protect our Website, employees, or operations.
- Measure or understand the effectiveness of the advertising we serve to you and others, and to deliver relevant advertising to you;
- Make suggestions and recommendations to you and other users of our Website about goods or services that may interest you or them.



We may use non-personal data for any business purpose.

#### Disclosure of Your Personal Data

We may share your personal data with:

- Any member of our corporate group, which means our subsidiaries, our ultimate holding company and its subsidiaries, and our affiliates.
- Business partners, suppliers, service providers, sub-contractors, and other third parties
  we use to support our business (such as analytics and search engine providers that assist
  us with Website improvement and optimization). We contractually require these third
  parties to keep that personal data confidential and use it only for the contracted
  purposes.
- Credit reference agencies when required to assess your credit score before entering into a contract with you.
- To fulfil the purpose for which you provide it.
- For any other purposes that we disclose in writing when you provide the data.
- Regulatory bodies as required to meet our legal obligations

We may also disclose your personal data to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- To a buyer or other successor in the event of merger, divestiture, restructuring, reorganisation, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, where one of the transferred assets is the personal data we hold.
- To comply with any court order, law, or legal process, including responding to any government or regulatory request.
- To protect the rights, property, or safety of our business, our employees, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of cybersecurity, fraud protection, and credit risk reduction.

We may share non-personal data without restriction.



### **Consent to Personal Data Transfer**

We are based in the United Kingdom of Great Britain and Northern Ireland. We may process, store, and transfer the personal data we collect, in and to a country outside your own, with different privacy laws that may or may not be as comprehensive as your own. By submitting your personal data or engaging with our Websites, you consent to this transfer, storing, or processing.

#### Your Personal Data Use Choices

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

- Promotional Offers from the Company. If you do not want us to use your contact
  information to promote our own products and services, or third parties' products or
  services, you can opt-out by sending us an email with your request to dpo@btt.net.uk.
  You may also opt-out of further marketing communications by replying to any
  promotional email we have sent you or following the opt-out links on that message.
- Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Website may become inaccessible or not function properly. For more information about tracking technologies, please see Cookies and Automatic Data Collection Technologies.

Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates, or include plug-ins enabling third-party features. If you follow a link to any third-party website or engage a third-party plug-in, please note that these third parties have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these third parties.

## **Accessing and Correcting Your Personal Data**



You can access, review, and change your personal data by sending us an email to dpo@btt.net.uk to request access to, correct, or delete personal data that you have provided to us. We may not accommodate a request to change or delete information if we believe the change or deletion would violate any law or legal requirement or negatively impact the information's accuracy.

### **Data Security**

The security of your personal data is very important to us. We use physical, electronic, and administrative safeguards designed to protect your personal data from loss, misuse, and unauthorised access, use, alteration, or disclosure.

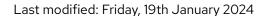
The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to take care when providing information in public areas of the Website like message boards, which any Website visitor can view.

# **Children's Online Privacy**

We do not direct our Website to minors and we do not knowingly collect personal data from children under 16 or as defined by local legal requirements. If we learn we have mistakenly or unintentionally collected or received personal data from a child without appropriate consent, we will delete it. If you believe we mistakenly or unintentionally collected any information from or about a child, please contact us at dpo@btt.net.uk.

# **Changes to Our Privacy Notice**

We will post any changes we may make to our privacy notice on this page and indicate on the Website home page that we updated this privacy notice. If the changes materially alter how we use or treat your personal data we will notify you by email to the primary email address specified in your account and/or through a notice on the Website home page. Please check back frequently to see any updates or changes to our privacy notice.





### **Contact Information**

Please address questions, comments, and requests regarding this privacy notice and our privacy practices to dpo@btt.net.uk.

Our corporate headquarters are located at 71-75 Shelton Street, Covent Garden, LONDON, WC2H 9JQ.

## **How to Complain**

If you are unhappy with how we use your personal information, you may contact us to express your concerns, see Contact Information. You may also complain to the Information Commissioner's Office:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Phone: 0303 123 1113

Website: https://www.ico.org.uk