

Website privacy policy

June 2018

1.0 Introduction

We take privacy and the protection of personal information seriously. This Privacy Notice sets out details about how we gather, use and share personal information and about individual privacy rights. How we use personal information depends upon the context in which it is made available to us.

This Privacy Policy applies to information that bptw partnership, and any parents, subsidiaries and affiliate entities worldwide (individually and collectively referred to herein as the "bptw partnership", "we," "us" or "our") collects about you.

We reserve the right to and may change this Privacy Policy on occasion where required. If we want to make use of your personal data in a way that we haven't previously identified, we will contact you to provide information about this, and if necessary, to ask for your consent. Our latest Privacy Policy is available on our website and should be reviewed for the avoidance of doubt.

2.0 What we collect

We collect and process a variety of personal information depending on the circumstances under which personal information is made available to us.

We may use personal information in the following circumstances:

- **Business contacts** - We hold the names, job titles, employer details and professional contact details for various business contacts, including client contacts, supplier contacts and interested parties.
- **Clients** – We hold the names, job titles and professional contact details for our clients in the course of carrying out a contract. In the course of carrying out the contract we may collect and use personal information of other individuals that work for our clients. This can include names, contact details and information about an individual's role.
- **Consultants** - If you are a consultant, we will process your name, professional and personal contact details, CV and professional background, payment details and information about the work you complete for us.
- **Job Applicants** - Where you apply for a role with us, we will process the personal information you provide to us as part of your application and any interview selection process. This will ordinarily include your name, personal contact details, professional history, education and qualifications and references. We may also collect and use some special categories of personal data about job applicants, such as information about an applicant's racial or ethnic origin and some health information regarding any medical conditions or disabilities.

We will collect additional personal information in the course of job related activities throughout the period of when an employee works for us.

3.0 How we gather your personal information

We only use personal information which we have obtained directly for the purposes described in this Privacy Notice.

Personal Information is gathered in the following ways:

- Business Contacts – This will be collected in the course of business-as-usual correspondence, business cards, social media contacts and events.
- Clients - This will be collected in the course of business-as-usual correspondence, business cards, social media contacts, events and at the initiation of a contract.
- Consultants - This will be collected in the course of business-as-usual correspondence, business cards, social media contacts and events.
- Job Applicants - Personal information will be gathered directly from you or a recruitment agency. We may sometimes collect additional data from third parties including former employers, credit reference agencies or other background check agencies.

4.0 What we do with the collected information

We will use personal information for the following purposes:

- Business contacts - We process the personal information of our business contacts as necessary for the legitimate interests of managing the day-to-day operation of our business, including correspondence, engaging suppliers, and promoting our services to business contacts. We may send marketing emails updating our contacts on our business activities, however your consent will be obtained before you receive such emails.
- Clients – We process our clients data in performance of a contract. We will also process the personal information of other individuals that work for our clients to the extent necessary in performance of the contract. We may send marketing emails updating our contacts on our business activities, however your consent will be obtained before you receive such emails.
- Consultants – We process the personal details of our consultants for the legitimate interests of determining whether to employ a particular individual for a role within a project. We may send marketing emails updating our contacts on our business activities, however your consent will be obtained before you receive such emails.
- Job Applicants - We process the personal information of job applicants for the legitimate interests of determining whether to employ a particular individual for a role in our organisation. Where we decide to employ a job applicant, we process their personal information for the purposes of entering into and performing our employment contract with the applicant. We process racial and ethnic origin and health information of job applicants for the purposes of meeting our legal obligations under employment and similar laws.

5.0 How long we keep personal information

We will never retain personal information for any longer than is necessary for the purposes we need to use it for.

Generally, in respect of personal information gathered in the context of a contract, we will retain personal information for the duration of the contract and a period of up to 15 years after the contract has expired or

terminated, in case such personal information is required for the exercise or defence of a legal claim during this period. If the personal information is required for the exercise or defence of a legal claim, the information will be retained for a further period from the initiation of the legal claim.

We may also retain personal information for as long as required by law or regulation.

Unsuccessful job applicant information is retained for a period of 6 months after the position has been filled.

We will retain the personal information of business contacts for 5 years.

6.0 Sharing personal information with third parties

We only share personal information with third parties:

- To the extent necessary for fulfilling the purposes outlined in section 4.
- When you post to a social media website, forum, review website or any other such facility in the public domain any information you choose to post will be available to access on the internet, depending on your own personal account settings. We recommend that you do not make public and sensitive personal information such as your postal address, with your permission or as permitted by law.
- Where we are under a legal or contractual obligation to do so; or
- Where is it fair and reasonable for us to do so in the circumstances.

We may share personal information with the following third parties:

- Suppliers - We use a number of different suppliers, including IT suppliers, payment processors and consultants, with whom we share personal information so that these suppliers can process personal information on our behalf. In these circumstances, we take steps required by data protection laws to ensure that these suppliers protect the personal information we share with them.
- Government bodies - We may be required by law to share personal information with government bodies and regulators (such as HMRC).

7.0 Sending personal information overseas

We may need to transfer personal information outside the UK and the European Economic Area (EEA) to our group companies / agents / franchisees and suppliers (including consultants) based in countries where data protection laws may not provide the same level of protection as those in the EEA – including China, the USA and India.

We will only transfer your personal information outside the EEA where either:

- The transfer is to a country which the EU Commission has decided ensures an adequate level of protection of personal information; or
- We have put in place our own measures to ensure adequate security as required by data protection laws. These measures include ensuring that personal information is kept safe by carrying out security checks on our overseas partners and suppliers, backed by strong contractual undertakings approved by the EU Commission (known as EU standard contractual clauses). Some US partners and supplier may also be certified under the EU-US Privacy Shield

which confirms they have appropriate measures in place to ensure the protection of personal information.

8.0 Security

We are committed to ensuring that your information is kept secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. We are cyber essentials accredited.

9.0 Phishing / Spoofing Schemes

If you receive a request to provide sensitive information (including your Account password, or any payment information) via email or to a website or individual claiming to be us, that does not appear legitimate, please do not respond or disclose your information. Please immediately report any such communication or request to us at: info@bptw.co.uk

10.0 Automatically Collected Site Usage Data

To facilitate the operation of a website, certain information is collected automatically from or about you in connection with your visit to the website or the device you are using to access the website. Servers may automatically gather site usage information (for example your IP address, information about your web browser, your device, your location (subject to consent), shopping, browsing and other such activities).

Like many companies, we (and our service providers) use cookies and other similar technologies to collect, store and track information about your Site usage. This information helps us to provide, operate, improve and personalise our Sites. For more information on cookies including what cookies are, how we use cookies and how to turn off cookies, please visit our cookie policy.

11.0 Children's Privacy

The Site is not directed to children under the age of thirteen (13). If you are under thirteen, do not provide your personal information on or to the Site. Users who are below the age of eighteen (18) should not use the Site without permission from their parent or legal guardian.

12.0 Privacy Rights

Individuals are entitled to exercise any of the following privacy rights in respect of our processing of personal information:

- **Access** - Individuals can request access to a copy of their personal information held by us, along with details of what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision-making.
- **Rectification** - Individuals can ask us to change or complete any inaccurate or incomplete personal information held about them.
- **Erasure** - Individuals can ask us to delete their personal information where it is no longer necessary for us to use it, or where we have no legal basis for keeping it.

- Restriction - Individuals can ask us to restrict the personal information we use about them where we are not able to erase their personal information or where an individual has objected to our use of their personal information.
- Object - Individuals can object to our processing of their personal information
- Portability - Individuals can ask us to provide them or a third party with some of the personal information we hold about them in a structured, commonly used, electronic format so it can be easily transferred.
- Withdraw Consent - Generally, we do not require consent to process personal information and so we do not ordinarily ask for consent to process personal information. However, where we do ask for consent to process personal information, such as marketing emails, individuals have the right to withdraw their consent at any time.

Please make all requests to exercise privacy rights to info@bptw.co.uk

We are required to verify the identity of anyone requesting to exercise their privacy rights and we may ask individuals to provide valid identification documents when making a request to allow us to do this.

We will not make any charge for responding to any request from an individual exercising their privacy rights, and we will respond to any requests in accordance with our obligations under data protection laws.

Individuals can make a complaint about how we have used their personal information to us by contacting us as noted above, or to the ICO (<https://ico.org.uk/concerns/>).

13.0 Contact Us

If you require additional information about the specific roles of any data controllers or processors and/or you have any questions about this Privacy Policy, please email us at info@bptw.co.uk, or in writing to:

The Information Security Manager
bptw partnership
40 Norman Road
Greenwich
London
SE10 9QX