

BTL GROUP LIMITED – PRIVACY POLICY

Overview

BTL Group Limited (CRN: 1878927) (“**BTL**”) has created this privacy policy (**policy**) in order to demonstrate our commitment to customer privacy. Privacy is of great importance to us. Because we gather important information from our visitors and customers, we have established this policy as a means to communicate our information gathering and dissemination practices.

For personal data for which BTL are a “controller” under the Data Protection Act 1998, BTL are registered with the UK Information Commissioner’s Office as a Data Controller. Our registration number is Z5225895.

In this policy, unless the context otherwise requires, reference to our sites includes reference to all of our associated websites and services including without limit BTL.com, Surpass.com and Surpass Service. This is to ensure consistency in application of this policy across BTL operations.

BTL regularly reviews this policy and reserves the right to change it from time to time.

This privacy policy was last updated on 11 February 2016.

Information about you which we collect and process

We (or our third party sub-processors acting on our behalf) may collect and process the following data about you:

Information you give us

You may give us information about you by filling in forms on sites or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our Surpass.com site, subscribe to our Surpass.com service, participate in discussion boards or other social media functions on our site, enter a survey, and when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information and personal description.

We require Users of the Surpass Service to store their name and e-mail address in order to receive a username and password. We also require Customers who register to use the Surpass Service to provide us with contact information, such as their name, company name, address, phone number, e-mail address, and billing information, such as billing name, and in some cases, credit card details. We also require confirmation of the number of users within the organisation that will be using the Surpass Services or the number of Tests expected to be delivered.

When Users take an assessment on BTL’s servers (or hosted servers (as the case may be)) (**Servers**), the relevant Customer may collect or receive personal information through our service on candidates including names, demographic and other information.

By taking or authorising an assessment on our Servers, you give consent for your personal information to be transmitted by BTL to the relevant Customer. We require all Customers to comply with all applicable privacy and data protection laws. The collection, use and further disclosure of your personal information by the Customer are subject to such Customer’s own privacy policy.

Information we collect

With regard to each of your visits to our site we may automatically collect the following information:

- technical information, including the 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, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you 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), and methods used to browse away from the page and any phone number used to call our customer service number.

Our use of information about you

We use the information about you that you give us and which we collect to:

- carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- notify you about changes to our service;
- ensure that content from our site is presented in the most effective manner for you and for your computer.

BTL uses the information that we collect to set up the Surpass Service for individuals and their organisation(s). We may also use the information to contact customers to further discuss customer interest in our company, the services that we provide, and to send information regarding our company or partners, such as promotions and events. Customers are invited to receive an email newsletter by providing an email address.

Customer email addresses and any personal customer information will not be distributed or shared with any third parties other than BTL employees, consultants and representatives. Customers can opt out of being contacted by us, or receiving such information from us, at any time by sending an email to support@btl.com. We may also email information regarding updates to the Surpass Service or company. Again, your email address will not be distributed or shared and customers can opt out of receiving any communication by emailing support@btl.com at the time it is distributed, or at the time any customer registers for the Surpass Service.

Except as we explicitly state at the time we request information, or as provided for in the Surpass Terms of Service or this Policy, we do not disclose to any third-party the information provided. All financial and billing information that we collect is used solely to check the qualifications of prospective customers and to bill for services. This billing information is not used by BTL for marketing or promotional purposes. BTL uses a third-party intermediary to manage the credit card processing. This intermediary is solely a link in the distribution chain, and is not permitted to store, retain, or use the information provided, except for the sole purpose of credit card processing.

Customers of the Surpass Service will be using the Surpass Service to host Customer Data. BTL will not review, share, distribute, print, or reference any such Customer Data except as provided in the Surpass Terms of Service, or as may be required by law. Individual records may at times be viewed or accessed only for the purpose of resolving a problem, support issue, or suspected violation of the Surpass Terms of Service, or as may be required by law. Customers are responsible for maintaining the confidentiality and security of their user registration and password.

BTL may also collect certain technical information from Users of the Surpass Service, such as internet addresses and system information. This information is logged to help diagnose technical problems, and to administer our Surpass Service in order to constantly improve the quality of the Surpass Service or to provide your organisation with useful usage reports. We may also track and analyse non-identifying and aggregate usage and volume statistical information from our customers and provide such information to third parties.

We may share your information with BTL approved third parties such as, suppliers and sub-contractors for the performance of any contract we enter into with you.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For

detailed information on the cookies we use and the purposes for which we use them see our Cookie policy on the BTL.com website.

Security

Our Surpass Service has security measures in place to help protect against the loss, misuse, and alteration of the Customer Data under our control. When our Surpass Service is accessed using the stated versions of web browsers which meet the Surpass System Requirements, Secure Socket Layer (SSL) technology protects information using both server authentication and data encryption to help ensure that Customer Data is safe, secure, and available only to you.

BTL also implements an advanced proprietary encryption system for certain data and hosts the Surpass Service in a secure server environment that uses a firewall and other advanced technology to prevent interference or access from outside intruders. Finally, BTL provides unique user names and passwords that must be entered each time a Customer logs on. These safeguards help prevent unauthorised access, maintain data accuracy, and ensure the appropriate use of Customer Data.

Storage of your personal data

Your personal information is stored on a secure server hosted by a BTL approved contractor. The server resides in the United Kingdom.

If you do not agree to this procedure you should not use our services.

Opting-out

BTL offers its customers a means to choose how we may use information provided. If, at any time after registering for information or ordering services, you change your mind about receiving information from us or about sharing your information with third parties, send us a request specifying your new choice. Simply send your request to support@btl.com.

Correcting & Updating Your Information

To update billing information or to discontinue the Surpass Service and to have your data returned, please email support@btl.com or call +00 (0)1274 203270.

If you need to update or change registration information you may do so by editing the user record. To update a User Profile, log on to Surpass and select Setup->Users to add or update information.