

BTL GROUP LIMITED – PRIVACY POLICY

15th May 2018

We are BTL Group Limited of Salts Wharf, Ashley Lane, Shipley, West Yorkshire, BD17 7DB, United Kingdom (“BTL”). We are a data controller of the marketing and other contact information that we collect from individuals.

If you agree to be on and to remain on our contact list, from time to time we will send you:

- information about our BTL products
- information about BTL related events (for example, news about the Surpass conference)

The legal basis of our processing of your contact information is consent (Article 6(1)(a) of the General Data Protection Regulation).

Categories of personal data that we hold about you are typically name, email address and details that relate to your professional job role.

We use Mailchimp to send our marketing communications. Mailchimp is a US company that has privacy shield status. Having privacy shield status means that Mailchimp is obliged to protect your contact information and use it only on BTL’s instructions.

We use other third party providers to help us to store and manage contact information, for example, Google LLC and Zapier Inc.

We ensure that all third party providers that we use have in place contracts for the protection of your contact information that oblige them to protect your contact information and use it only on BTL’s instructions. Where our third party providers are US companies, we ensure that they have privacy shield status so that they are obliged to protect your contact information and use it only on BTL’s instructions.

We share marketing and contact information that we collect with our group companies for the purpose of making decisions about marketing strategy and lead generation. Where we share personal data with our US subsidiary, BTL Surpass Inc, we have in place an EU Model Clause Agreement that obliges our US subsidiary to protect your contact information and use it only on BTL’s instructions.

Our retention period for contact information is determined in the following way: for anyone who is not a customer and who has not clicked on or responded to any marketing emails from us within a timeframe of 2 years, we will remove your contact information from our database.

You have the right to have a copy of the personal data that we hold about you. In addition, you can ask us to rectify or reduce the amount of personal data that we hold about you, or can ask us to delete your personal data from our database. You can withdraw your consent to receive any marketing emails from us at any time. Where you wish to do this, please let us know by clicking on this link and unsubscribing

<https://btl.us1.list-manage.com/unsubscribe?u=3c463efaf0fa2fe4bd1361ea6&id=d5cc53926b>

You have the right to lodge a complaint with the Information Commissioner's Office (the UK regulator), where you feel that we have misused or abused the treatment of your personal data.

You are not contractually obliged, or obliged by law, to provide any personal data to us. Where you do not provide your personal data to us, or withdraw your consent for us to use your personal data, we will not be able to send you information about BTL products or information about BTL related events.

We profile you in the following ways. We look at the sector that you work in, organisation's name and the location and country where you work, with a view to us making contact with you more relevant. For example, if you are working in healthcare or financial services, we would try to tailor our newsletters and invitations that we send to you so that they are more likely to be of interest to you. If you are a customer and are using a particular version of our Surpass product, we also aim to tailor our communications with you so that you receive information about the Surpass version which is most relevant to you. If you are interested in conferences, we look at your past conference attendances with a view to trying to suggest other meetings that you might be interested in attending.

Previous Privacy Policy Versions:

<http://www.btl.com/legal/11-February-2016-Privacy-Policy.pdf>