Privacy Policy

PURPOSE

At BTS, privacy is a serious matter, and we are committed to protecting it.
In accordance with the General Data Protection Regulation ("GDPR"), this policy explains when, why and how BTS is governed by this Regulation:

- Collect personal data about individuals;
- Use this information;
- Disclose this kind of data to others, when this is necessary and under certain conditions;
- Keep secure and confidential this personal data.

WHO WE ARE

BTS ('we' or 'us) collect, use and are responsible for certain personal information about you. When we do so we are regulated under the General Data protection Regulations which apply across the European Union (including the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

HOW AND WHAT PERSONAL INFORMATION IS COLLECTED

We may collect and process the following personal data:

Personal data you give to us: this is information about you that you give to us, entirely voluntarily, by entering information via:

- Our websites;
- Social media platforms;
- Corresponding with us by phone, email or otherwise.

The information you give us may relate to your identification, such as your name, address, email address and phone number, or enquiry details, and may include records of any correspondence and responses to any queries.

Personal data we collect about you: we may automatically collect the following information:

- Details of your visits to our websites, including, but not limited to, traffic data, location data, and other communication data, and the resources you access;
- Technical information, automatically collected, including anonymous data collected by the hosting server for statistical purposes, the Internet protocol (IP) address used to connect your computer or device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Any personal data which you allow to be shared that is part of your third-party social network.

Personal data we may receive from other sources: we obtain certain personal data about you from sources outside our business from other third-party companies.
The remaining provisions of this policy also apply to any personal data we obtain from these sources.

WHY AND HOW WE USE YOUR PERSONAL DATA

We process your personal data lawfully for:

- The purpose of handling communication and exchange of information with our website's users;

- The purpose of managing our customer/prospect relations; notably when placing orders or/and responding to your requests
- any other specific purpose indicated at the time of collecting the information.

We may use and process your personal data principally:

- **Where you have provided freely given and explicit CONSENT** and for specific, determined and legitimate purposes. You may withdraw your consent for us to use your information by contacting us at any time.
- **Where it is necessary for us to pursue our LEGITIMATE INTERESTS** as a business, provided that your interests or your fundamental rights and freedoms are not overriding, taking into consideration your reasonable expectations, based on your relationship with us.

For example, for the following purposes:

  - Direct marketing activities (other than where we rely on your consent) as analysis to improve our marketing strategy, and to enhance and personalise your user experience;
  - Detection, prevention and mitigation of fraudulent or other illegal activities;
  - Network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access.
- **Where it is necessary for us to COMPLY WITH A LEGAL OBLIGATION** and notably:
  - To assist a public authority or criminal investigation body;
  - To identify you when you contact us under certain legal circumstances;
  - To verify the accuracy of data we hold about you.
- **Where it is required for the PERFORMANCE OF A CONTRACT,** we have with you (this includes the company that you work for), or because you have asked us to take specific steps before entering into a contract. This will include information that we process in order to enable you to make use of our website and the services we provide.

This policy and its outlined processes relate to the management of any external subcontractors that work on projects, jobs or individual tasks on behalf of our company.

WHO MAY RECEIVE OR HAVE ACCESS TO YOUR PERSONAL DATA

Our Suppliers and Service Providers

We may disclose your information to our third-party service providers, agents, subcontractors and other organisations for the purposes of providing services to us or directly to you on our behalf. Such third parties may include cloud service providers (such as hosting and email management), administrative services or other third parties who provide services to us and assist us in the operation of our business and website.

When we use third party service providers, we only disclose personal data that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and confidential, and not to use it other than in accordance with our specific instructions.

Third Parties who Provide Products and Services to You Through Us

We work closely with various third parties to bring you a range of products and services which are complementary to those which we provide.

When you enquire about or purchase one or more of these products and services through us, the relevant third party may use your details to provide you with information and to carry out their obligations arising from any contracts.

These third-party product providers may share your information with us which we will use in accordance with this policy. In some cases, they will be acting as a controller of your information and

therefore we advise you to read their own privacy policy.

Other Ways We May Share Your Personal Data

We may transfer your personal data:

- To a third party as part of a sale of some or all of our business assets to any third party or as part of any business restructuring or reorganisation;
- If we are under a duty to disclose or share it in order to comply with any legal obligation or when this disclosure is required by applicable laws, court orders or government regulations, to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our visitors and customers;
- To enforce applicable terms of use, to protect the rights, privacy, safety or property of our companies;
- If you have consented to the disclosure.

However, we will always take steps to ensure that your privacy rights continue to be protected.

WHERE WE STORE YOUR PERSONAL DATA

Your information is stored either in our databases or in the databases of our service providers.

We will not transfer your personal information outside of the EEA at any time.

HOW LONG WE KEEP YOUR PERSONAL DATA

We retain your personal data for a period of time necessary to achieve the purpose for which we use that information and to fulfil our obligations under other laws.

In general, this means that we will only hold your personal data for a minimum of 1 year and a maximum of 12 years.

We many need your personal information to establish, bring or defend legal claims. For example, we will retain your personal information for 12 years in case a claim is brought by the defects liability clause within a contract.
We do not retain personal data in an identifiable format for longer than is necessary.

WHAT ARE YOUR RIGHTS

Subject to applicable law and certain exemptions, restrictions or circumstances, you may have the right:

- To access your personal data;
- To correct, modify and update your personal data;
- To erase your personal data or restrict its processing;
- To withdraw your consent;
- To ask us to transfer your personal data in a structured data file to you or to another service provider if it is technically possible (data portability);
- To lodge a complaint with the competent supervisory authority and seek a judicial remedy.

These rights may be exercised by written request sent to the contact details provided in this policy. A reply will be provided to you within a reasonable time, in accordance with the applicable regulations.

HOW WE ENSURE SECURITY AND CONFIDENTIALITY

Our aim is to keep your data as safe and secure as possible at all times. Once we have received your personal data, we put in place reasonable and appropriate technical and organisational measures and controls to prevent as much as possible any accidental or unlawful destruction, loss, alteration, or unauthorised access.

HOW COOKIES WORK

Like many other websites, our websites use cookies (including Google Analytics cookies) to obtain an overall view of the volumes and the habits of our visitors on our websites.

“Cookies” are small pieces of information sent to your device and stored on its hard drive to allow our website to recognise you when you visit.

It is possible to switch off cookies by setting your browser preferences.

CHANGES TO THE PRIVACY POLICY

This privacy policy is reviewed annually.

We may change this privacy policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version that will apply each time you access this website.

CONTACT US

Please direct any queries about this policy to our Data Protection Officer using our contact details below.

If you wish to write to us, please write to the below:

BTS Head Office
Unit 3, Devonshire Business Centre
Cranborne Road
Potters Bar
Hertfordshire
EN6 3JR

Our email address for data protection queries is admin@btsgroup.co.uk

Alex Sanderson (Managing Director)

Date: 26/03/25