

# PRIVACY POLICY



## BACKGROUND:

BTP Performance Ltd (“The Company”) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, [www.btpperformance.com](http://www.btpperformance.com) (“Our Site”) and uses our services (“Our Clients”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it.

### 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of Our Site;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 14.

### 2. Information About Us

**Our Site** is owned and operated by **BTP Performance Ltd**, a Limited Company, registered in England and Wales under **Company Number 14926875**.

Registered address: Unit 7, Cart Barn, Barnfield Farm, Finedon Road, Finedon, NN9 5NQ

Representative: Theresa Wright

Email address: [theresa@btpperformance.com](mailto:theresa@btpperformance.com).

### 3. What Does This Policy Cover?

This Privacy Policy applies to your use of Our Site and use of Our Services. Please note that Our Site may contain links to other websites and that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

### 4. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be

identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## 5. **What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about The Company's collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about The Company's use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 15.

## 6. What Data Do You Collect and How?

Depending upon your use of Our Site and Our Services, we may collect and hold some or all of the personal (and non-personal) data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about Our Site's use of Cookies and similar technologies. We do not collect any 'special category' or 'sensitive' personal data.

Data Collected	How We Collect the Data
Identity information including name and title.	Web contact forms, email, phone calls or collected via in person conversations, completion of account application form.
Contact information including email address, telephone number, postal address.	Web contact forms, email, phone calls or collected via in person conversations, completion of account application form.
Business information including Business name, industry, job title, professional qualifications, address, geographic location. Company goals, mission and values, business strategy, SWOT analysis.	Web contact forms, email, phone calls or collected via in person conversations, completion of account application form and website cookies.
Payment information including card details bank account numbers.	Completion of direct debit mandate, provided over the phone, online payment portals such as PayPal and Stripe.
Profile information including preferences, behavioural proclivities, interests, skills and knowledge and other data needed to deliver effective services.	Personality profile questionnaires, surveys, email, phone and in person communications.
Technical information including IP address, browser type and version, operating system.	Cookies for Google Analytics and Remarketing e.g. Google Ads, Facebook and YouTube.
Data from third parties including the technical information, contact information and profile information detailed above, company financial information including credit scores.	Cookies for Google Analytics and Remarketing e.g. Google Ads, Facebook and YouTube. Information provided by other representatives from your organisation or linked partners. Company Searches Made Simple, Companies House etc.

## 7. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful basis for doing so:

What We Do	What Data We Use	Our Lawful Basis
Registering you for our services.	Identity information and contact information.	Legitimate interest – to provide you with the service you require.
Providing and managing your Account.	Identity information, payment information and contact information.	Contract
Supplying our services to you.	Identity information, contact information, business information, profile information.	Contract
Managing payments for our products.	Payment information.	Contract.
Personalising and tailoring our services for you.	Business information, profile information.	Legitimate interest – to ensure we provide you with a highly effective service.
Communicating with you.	Contact information.	Contract.  If prior to becoming a client, Legitimate interest – in order to provide you with the information you have requested or expressed an interest in.
Improving our services to you and future clients.	Profile information and feedback on services provided.	Legitimate interest to develop BTP Performance Ltd.
Supplying you with information by email and/or post that you have opted-in-to (you may opt-out at any time by unsubscribing from communications or by emailing info@btpperformance.com)	Contact information, profile information.	Consent.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or text message and/or post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. **We will NEVER share your personal data with third parties for marketing purposes,**

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or

those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 15.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information including name and title.	Duration of client/supplier relationship plus 2 years, or for as long as consent is given – whichever is greater.
Contact information including email address, telephone number, address.	Duration of client/supplier relationship plus 2 years, or for as long as consent is given – whichever is greater.
Business information including Business name, industry, job title, professional qualifications, address, geographic location. Company goals, business strategy, SWOT analysis.	Duration of client/supplier relationship plus 2 years.
Payment information including card details bank account numbers.	Duration of client/supplier relationship plus 2 years. Copies of invoices will be kept for 7 years.
Profile information including preferences, behavioural proclivities, interests, skills and knowledge and other data needed to deliver effective services.	Duration of client/supplier relationship plus 2 years.
Technical information including IP address, browser type and version, operating system.	6 months.
Data from third parties including the technical information, contact information and profile information detailed above, company financial information including credit scores.	Duration of client/supplier relationship plus 2 years

9. **How and Where Do You Store or Transfer My Personal Data?**

Wherever possible, we will store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation. If this is not possible, we will store your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where we are legally required to do so.

10. **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to the following exception[s].

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may sometimes contract with the following third parties to supply certain services.

<b>Recipient</b>	<b>Activity Carried Out</b>
Sage (data processor)	Processing quotes, invoices and other relevant financial purposes.
GenieAI (data processor)	Holding contact details of all clients and prospective clients, together with information relating to services client has or is interested in receiving. Together with marketing and calendar scheduling activities
Microsoft (data processor)	Storing communications and information relating to the provision of services (Outlook and Sharepoint)

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, Our obligations, and the third party’s obligations under the law, as described above in Part 9.

If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be

within the UK and under the Data Protection Legislation, as explained above in Part 9.

## 11. **How Can I Control My Personal Data?**

11.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details).

11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 12. **Can I Withhold Information?**

You may access Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 14.

## 13. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will aim to respond to your subject access request within two weeks and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 14. **How Do You Use Cookies?**

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our services. We have carefully chosen these Cookies and have taken steps

to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a message requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be "strictly necessary". These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser's settings as detailed below, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how Our Site is used. This, in turn, enables us to improve Our Site and the services offered through it.

The analytics service(s) used by Our Site use(s) Cookies to gather the required information. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable us to continually improve Our Site, making it a better and more useful experience for you.

The analytics service(s) used by Our Site use(s) the following Cookies:

<b>Name of Cookie</b>	<b>First / Third Party</b>	<b>Provider</b>	<b>Purpose</b>
<b>_dc_gtm_&lt;property-id&gt;</b>	<b>First party</b>	<b>Google Analytics</b>	<b>Gather analytics of visitor's use of website</b>
<b>_ga</b>	<b>First party</b>	<b>Google Analytics</b>	<b>Gather anonymous data relating to visitors to website</b>

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.



15. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: [theresa@btppperformance.com](mailto:theresa@btppperformance.com).

Postal Address: Unit 7, Cart Barn, Barnfield Farm, Finedon Road, Finedon, NN9 5NQ.

16. **Changes to this Privacy Policy**

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 10 July 2023. Active clients will be notified by email of any changes to this privacy notice.

17. **Attribution**

This Privacy Policy has been created using a document template from [www.simply-docs.co.uk](http://www.simply-docs.co.uk).