



Privacy Policy

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Introduction

Here at BPA we take the protection of your personal information very seriously. This Privacy Policy sets out important information on where and how we collect your personal information, what we do with it, how we protect it, and what your rights are in relation to the personal information we hold about you.

Purpose

This privacy policy relates to our use of any personal data we collect from you from any of our services. Whenever you provide such information, we are legally obliged to use your information in line with all applicable laws concerning the protection of personal data; including the Data Protection Act 1998 (DPA) and The General Data Protection Regulation 2016 (GDPR) together, and with other subsequent laws "Data Protection Laws".

This Policy applies if you interact with us through our websites, on social media, or at events, trade shows or webinars. This Policy also applies to our internal operations including sales, finance, marketing, procurement and legal. By providing personal information, you agree to the terms and conditions of this Privacy Policy.

We are not responsible for the privacy, information or other practices of any third parties, including any third party operating any website to which our websites contain a link. The inclusion of a link on any of our websites does not imply endorsement of the linked site by us.

Scope

This Policy generally applies to our global operations. We know that some jurisdictions have unique privacy laws and where applicable we will comply with those local laws (“Data Protection Laws”).

What is covered by this Policy?

- ✓ Personal information we collect on our websites and applications
- ✓ Personal information we collect for marketing and business development activities
- ✓ Personal information we use for internal operations like finance and business operations

This policy does not cover where we collect or process data relating to our employees, or where we are a service provided and processor in a business-to-business (B2B) context and where these B2B customers use our solutions to collect or process data.

Who are we?

When we say “we” or “us” in this policy, we are referring to BPA Corporate Facilitation Ltd.

What personal information do we collect and hold, and what do we use this for?

We collect and process Personal Data. Typically, the Personal Data we collect and process will include name, address and email address but we may collect and/or process other Personal Data from time to time. It also may include IP address and cookies of your visit to our websites.

a. Marketing and Business Development

- i. Information such as your name, address, email, job title, telephone number which you provide to us through form submissions, events, feedback and enquiries
- ii. Information about the services that we provide to you, including event, virtual events, webinar registrations, white paper downloads and other information we share with you and you share with us as part of any related registrations
- iii. Your account login details for our websites and apps, including your username and chosen password
- iv. Information about whether or not you want to receive marketing communications from us and what your communication preferences are
- v. Information on how you interact with any of our emails or other communications, including if you have opened and engaged with the emails or other communications
- vi. Information related to our social media and website activities, including how you use our websites to help us improve your experience
- vii. Information we get from third parties, including event organisers, our partners, service providers, your colleagues, and publicly available information. To ensure the data we hold is up-to-date we may periodically ask you to confirm this information or we may supplement this information with additional data we collect from other sources

b. Sales, Finance, Business Operations and Delivering Services

- i. We deliver services to enterprise customers and you may be an employee or representative of those customers who is involved in some aspect of the relationship we have with our customer
- ii. Information you, your company or our partner provide to us such as your name, address, email, job title, and telephone number so we can deliver our services, provide proposals during a sales cycle and negotiate agreements, manage customer accounts and process and fulfil orders
- iii. Information about training or other services we deliver to you, including administering our certification programs
- iv. Information we collect as part of partner on-boarding, including information we obtain from third parties to complete on-boarding compliance checks
- v. Information we collect to deliver support to our customers, including ticketing information and details of the support request
- vi. Information we obtain from you to improve our services
- vii. Information captured by our CCTV if you visit any of our premises, visitor logs and other information we collect to ensure our premises remain safe and secure
- viii. We will monitor customer usage of our services to ensure compliance with our customer agreements and this may include audits of named users or other inspections which involve the processing of personal information
- ix. We may record calls, correspondence and other communication channels, including screen capture, for compliance, quality, training and other purposes
- x. We may video record or screen capture training seminars, presentations, webinars for compliance, quality, training and other purposes
- xi. We may aggregate, anonymise and/or de-identify personal information such that it is no longer personal information for the purposes of enhancing our services and business practices
- xii. Where we demonstrate our services and solutions to you, we may collect your personal information as part of a trial or test

What is our legal basis for processing your personal information?

Where we process your personal information, we do so in accordance with applicable privacy laws. The most common legal bases we rely on are:

- **Consent:** You have told us you are happy for us to process your personal information for a specific purpose
- **Legitimate interests:** the processing is necessary for us to conduct our business, but not where our interests are overridden by your interests or rights. Where we use Legitimate Interests we will record our decision and our method on making this decision.
- **Performance of a contract:** we must process your personal information in order to be able to provide you with one of our products or services

Although less common, there may be circumstances when other legal bases are appropriate:

- **Vital interests:** the processing of your personal information is necessary to protect you or someone else's life
- **Legal obligation:** we are required to process your personal information by law

Who might we share your personal information with?

We only ever share personal information if we have appropriate confidentiality and data protection agreements in place. We are a global Organisation and our professionals may use personal information for the purposes outlined in this policy.

a. With our Partners

We may deliver our services through a partner or assist a partner in their provision of services to you. Where required to deliver these services we may need to share information with our Partners. Except in jurisdictions where expressly deemed so, we are not responsible or liable for the user of personal information by such Partners

b. With our Vendors

To deliver our marketing and business development campaigns we may share data with digital marketing providers, social media and advertising companies, market research partners, webinar hosts, venues, event organisers and registration providers, and other trusted vendors who assist in the performance of our marketing campaigns. We also use consultants, contractors and other specialists to provide professional services. Please see below the list which sets out the categories of recipients of personal data:

- IT Support and Infrastructure Services
- Data and email hosting providers
- Secure document disposal service
- HR system provider
- Email marketing platforms
- Office cleaning services
- Accountants and financial systems
- Solicitors

c. Law Enforcement and Legal Compliance

We also use and disclose personal information, as we believe to be necessary or appropriate:

- i. Under applicable law, including law outside your country of residence
- ii. To comply with legal process
- iii. To respond to requests from public or government authorities, including public and government authorities outside your country of residence
- iv. To enforce our terms and conditions
- v. To protect our operations
- vi. To protect our rights, privacy, safety or property, and/or that of you or others
- vii. If we are involved in any discussions related to the sale of all or part of our business
- viii. To allow us to pursue available remedies or limit the damages that we may sustain

How do we secure your data?

We use appropriate technical and organisation measures to protect personal information under our control. We implement security measures appropriate to the nature of the processing and regularly review these measures to ensure they remain appropriate.

If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting us in accordance with the [Contact Us](#) section below.

Do we transfer your data internationally?

No, any digital data that contains your personal information is stored within the EU

What happens when you apply to work for us?

If you apply to work for us (directly or indirectly) in any role (including volunteers) we may receive data about you from third-parties. In addition, we will keep the details of your application and any additional information provided to us by you or others during the application so that we keep you informed of future opportunities that you may be interested in. If you do not wish for us to keep your details for this reason, please let us know by contacting us using the details provided in the [Contact Us](#) section below.

How long do we keep your data for?

We will keep your personal information for the purposes set out in this Privacy Policy and in accordance with applicable privacy laws and relevant regulations. We will never retain your personal information for longer that is necessary.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide services to you or our customers (e.g. for as long as you have an account with us or keep using the services);
- Whether there is a legal obligation to which we are subject (e.g. certain laws require us to keep records of your transactions for a certain period of time before we can delete them)
- Whether retention is advisable in light of our legal position, such as in regard to applicable statutes of limitations, litigations, or regulatory investigations

What are your rights?

You may have a number of rights under applicable privacy laws which, in certain circumstances, you may be able to exercise in relation to the personal information we process about you. These may include:

- **The right to be informed** about how we process your data
- **The right to access** a copy of your personal information we hold about you
- **The right to rectification:** we are obliged to correct or update your details
- **The right to be forgotten:** you have the right to erasure under specific circumstances. A request for your personal data to be deleted will be decided on a case by case basis and must be submitted in writing to the contact details outlined in the [Contact Us](#) section below
- **The right to data portability:** you have the right to obtain and reuse your personal data that you have provided to us
- **The right to restrict processing** of your personal data by us
- **The right to object** to our use of your personal information
- **The right in relation to automated decision making and profiling:** we do not use automatic decision making or profiling

Where we rely on consent as the legal basis on which we process your personal information, you may also withdraw that consent at any time.

If you are seeking to exercise any of these rights, please contact us using the details in the [Contact Us](#) section below. Please note that we may need to verify your identity before we can fulfil any of your rights under data protection law. This helps us to protect personal information against fraudulent requests. We use a trusted third-party vendor to collect the information in the Contact Us form. You may have the right to complain to a competent regulator or supervisor authority in your jurisdictions.

All our marketing emails include an “unsubscribe” option and offer you the ability to manage email preferences.

Data Protection Officer(s) and EU/UK representatives

EEA: If you are located in the EEA, please note that if the data controller which is processing your personal information is located outside of the EEA, you may contact us at Verint Netherlands BV, of Paasheuvelweg 1, 1105 BE Amsterdam, Netherlands

UK: we have appointed a data protection team who can be contacted through the [Contact Us](#) section below.

Contact Us

If you would like to exercise one of your rights as set out in the Your Rights section, or you have a question or a complaint about this policy, or the way your personal information is processed, please contact us by submitting your request to:

FAO: The Privacy Team
BPA Corporate Facilitation Ltd, Milford House, Pynes Hill, Exeter EX2 5AZ
Email: privacy@bpaquality.co.uk
Telephone: 01392 347400 and ask to speak to the Privacy Team

Review

This Policy was reviewed on behalf of BPA Corporate Facilitation Ltd by Javier Albini on 9th September 2022
This policy will be reviewed by September 2023