

BPA Global Privacy Notice



BPA
QUALITY

Contents

Who are we?	3
What is covered by this privacy notice?.....	3
Summary	4
What information do we collect and hold, and what do we use this for?.....	4
What do our lawful bases mean?	9
Third party websites	9
Cookies	9
Who might we share your personal information with?.....	10
How do we secure your data?.....	11
Do we transfer your data internationally?.....	11
How long do we keep your data for?.....	11
Your rights.....	12
Contact Us.....	12
Complaints.....	12
United Kingdom, Switzerland, EU and the European Economic Area	12
California.....	14
Review.....	18

Welcome to BPA's Privacy Notice. Protecting personal information is important to BPA.

This Privacy Notice explains how we collect personal information, what we do with it, how we protect it, and what your rights. Personal information may be any form of data that could be used to identify you, directly or indirectly.

This Privacy Notice generally applies to our global operations. Some jurisdictions have unique privacy laws and where applicable, we will comply with those local laws.

Who are we?

We are BPA Corporate Facilitation Ltd. When we say “we” or “us” or “BPA” in this Privacy Notice, we are referring to BPA Corporate Facilitation Ltd. and BPA International Inc.

For the purposes of UK and EU data protection law, the controller will typically be the regional company you choose for your BPA trading relationship, which will be shared in accordance with this Privacy Notice. Your controller(s) may depend on where you are geographically located and how you interact with BPA, and in some cases, multiple BPA entities could be considered joint controllers.

Usually, the primary data controllers in our regions are:

- **Americas:** BPA International Inc, 175 Broadhollow Road, Suite 100 Melville, New York 11747
- **EMEA:** BPA Corporate Facilitation Limited, Milford House, Pynes Hill, Exeter, EX2 5AZ

What is covered by this privacy notice?

Unless stated to the contrary, this Privacy Notice applies:

- when you use BPA websites, on-line portals, access services or applications (our “Services”),
- if you interact with us on social media, or at trade shows, webinars or other events,
- when BPA runs marketing and business development activities,
- when we conduct our internal operations (like finance, business, sales, market, procurement and legal)

This Privacy Notice does **not** apply:

- when BPA acts as a service provider/data processor for its enterprise (business-to-business) customers or partners
- to BPA employees
- to job applicants applying for positions advertised by BPA – instead, please read our Recruitment Privacy Notice available on [our website](#)

Where we are a service provider for our enterprise customers or partners (in a B2B context), generally we are a service provider/data processor and our contract with each customer or partner, including our Data Privacy standards, will set out what personal information processing we carry out for that customer or partner as service provider/data processor.

If you have questions about how an enterprise customer or partner uses your personal information as a business/data controller, please contact that enterprise customer or partner.

Summary

You can find out more detailed information about how BPA processes personal information below, but here are some key summary points we think you might want to know:

- We operate in the business-to-business (B2B) market, so we may collect personal information relating to employees or agents of business customers, partners, prospects and other businesses including vendors who supply to BPA, in each case where required to support our operations
- Your personal information is, where appropriate or necessary, shared within our global group
- We use third party vendors, where appropriate, who are located in the UK, EEA and the U.S. to store and process personal information to support our business activities
- We do not sell your personal information
- We send business-to-business marketing communications (including event and webinar invitations, knowledge leadership, and information on our solutions)
- We use personal information to support our global operations, including sales, finance, customer service and other business operations
- We only keep your personal information for as long as it is needed to support our business operations

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

[Marketing and Business Development](#)

If you browse any of our websites:

We collect:

- Technical information, including your IP address, device information, and browser information used to access our Services
- Usage information about how you use our websites and access content, including IP address, URL and clickstream data, website interaction data
- information about how you interact with us on social media, including your

social media handle

We use this to:

- ensure our Services are presented to you in the most effective way on your device
- diagnose problems with our server or administer our websites
- analyse user traffic to understand how people use our Services, measure use of our websites and to improve the content and functionality of our websites and Services
- where required under applicable law, comply with legal or regulatory obligations

Our lawful basis for this is:

- our legitimate interests in providing and improving our Services
- where required, your consent (e.g. for non-necessary cookies)
- where required under applicable law, to comply with our legal obligations

If you contact us:

We collect:

- contact information, including your name, address, email, job title, and telephone number and form content and other information you share with us, for example in forms that you complete or by interacting with intelligent virtual agent functionality on our websites

We use this to:

- reply to your form submissions, events, feedback, and enquiries

Our lawful basis for this is:

- our legitimate interests, in order to respond to you when you contact us
- complying with any contract with you

If you engage with our events and resources (such as webinars):

We collect:

- contact information
- other registration information you share with us
- personal information shared with us by third parties including event organisers, our business partners, service providers and publicly available information

We use this to:

- provide our Services to you, including event, virtual events, webinar registrations, white paper downloads and other information we share
- If you register for a paid event, payment information will be collected through a trusted third-party provider and we will not receive your payment

information

Our lawful basis for this is:

- complying with any contract with you
- our legitimate interests in managing relationships with customer and partner organisations

If you create a BPA account:

We collect:

- account login details including your email address, username and password

We use this to:

- administer your access to our websites or to access online Services which are used to provide our Services which you access in your role when appointed to do so by our customers, partners or vendors

Our lawful basis for this is:

- our legitimate interest in managing relationships with customer and partner organisations, and administering and complying with any contract with you

If we send you direct marketing:

We collect:

- marketing preferences, including whether or not you want to receive marketing communications from us and what your communication preferences are,
- interaction information about how you engage with our email, social media or other communications, including opening and viewing emails, web-site content, social media content or other communications

We use this to:

- provide you with information about our products and services
- provide you with information about training or other services we deliver to you
- help us improve your experience and tailor our future marketing based on your preferences or behaviours

Our lawful basis for this is:

- where permitted, our legitimate interest in promoting and marketing BPA products and services
- where required under applicable law, your consent to any direct marketing or to cookies or similar technologies.

If your organisation engages us to provide our services, or if you work for a vendor or partner of BPA:

We collect:

- contact information, including your name, address, email, job title, and telephone number and other information you, your organisation provides to us or you have provided to BPA in order to access and use relevant Services
- vendor, customer or partner on-boarding information, including information we obtain from third parties to complete on-boarding compliance checks and credit checks prior to providing Services to your organisation
- feedback and support information provided to us, for example in response to customer satisfaction surveys about your organisation's use of our Services or during support requests associated with use of our Services

We use this to:

- deliver Services to enterprise customers or partners and you may be an employee or representative of those customers or partners and you are involved in some aspect of the relationship relating to use of our Services
- deliver our Services, provide proposals during a sales cycle and negotiation of agreements, manage customer accounts and process and fulfil orders
- deliver support to our customers or partners including ticketing information and details of the support request
- to improve our Services
- • monitor customer usage of our Services to ensure compliance with our contract and this may include keeping a record of named users' usage or conducting audits which involve the processing of personal information
- work with our vendors and manage our vendor relationships, including in accordance with applicable contract terms with vendors

Our lawful basis for this is:

- our legitimate interest in managing relationships with customer and partner organisations, and administering and complying with applicable contract terms.
- our legitimate interest in managing relationships with vendors, and administering and complying with applicable contract terms

If you visit our offices:

We collect:

- information captured by our CCTV if you visit any of our premises,
- visitor logs, including your name, contact details and visit details
- other information - for example, any dietary requirements for meetings or events.

We use this to:

- to ensure our premises remain safe and secure
- administer meetings which you attend at our offices

Our lawful basis for this is:

- our legitimate interest in ensuring our premises are safe and secure for our staff and visitors), including the effective administration of meetings

If we record media:

We collect:

- audio, video and visual (i.e. screen capture) recordings, including of:
 - ❖ calls, correspondence and other communication channels
 - ❖ training seminars, presentations, and webinars

[If we record any telephone or video call, or other media, we will inform you of this prior to the recording taking place.]

We use this:

- to allow you and others, where appropriate, access to recorded training seminars, presentations and webinars
- for compliance, quality, training and other purposes

Our lawful basis for this is:

- our legitimate interest in providing knowledge material as part of our promotional activities
- our legitimate interest in improving our Services and solutions and ensuring compliance with our internal policies and procedures

If you attend a demonstration for our Services:

We collect:

- personal information as part of a trial or test

We use this to:

- demonstrate our Services and solutions to you (in some circumstances, we will provide you with further privacy information, in addition to this Privacy Notice)

Our lawful basis for this is:

- our legitimate interest in providing demonstrations of our Services and solutions to you
- where required, your consent and/or explicit consent

We may need to use any of your personal information to comply with legal requirements and exercise or defend legal claims.

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.

We may aggregate and anonymise personal information such that it is no longer personal information for the purposes of enhancing our services and business practices.

What do our lawful bases mean?

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 provided your express consent to process your personal information for purposes set out in this Privacy Notice during the capture of your personal information
- **Legitimate interests:** The processing is necessary for us to conduct our business, but not where our interests are overridden by your interests or rights in law.
- **Performance of a contract:** We must process your personal information in order to be able to provide you or the organisation you represent 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 or physical safety.
- **Legal obligation:** We are required to process your personal information by law.

Third party websites

We are not responsible for the privacy, information or other practices of any third parties, including any third party operating any platform or site which links to our website, or 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 and you should be satisfied of the relevant third party's use of your personal information and the applicable privacy notice.

Cookies

Our websites and applications use cookies to help give you the best experience, for advertising, and to help us improve our service offering. For more information please see our Cookie Notice.

Who might we share your personal information with?

When we share your personal information, it will continue to be subject to one or more appropriate safeguards set out in the applicable law.

These might be to a jurisdiction recognised as ‘adequate’ under UK or EU/EEA law, through an approved transfer scheme, such as the use of standard contractual clauses in a form approved by regulators or other competent authorities.

Within our group:

We are a global organisation and our professionals who use personal information for the purposes outlined in this Privacy Notice may be employed by any of our group entities. Our entities have entered into binding inter-group transfer agreements which recognise the standards of international data transfers (see the section below on “Do we transfer your data internationally?”).

With our business support partners

We may deliver our services through our business support partners.

We may also assist a partner in its provision of services to our customers and other partners who service our customers. Where required to deliver these services we may need to share personal information with our partners.

With our vendors and service providers for the following purposes:

- **Marketing and Business Development:** to deliver our marketing and business development campaigns we may share data with digital marketing providers, social media companies with whom BPA has a business account 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.
- **Sales, Finance, Business Operations and Delivering Services:** We use (a) third-party sales tools to track pipeline activity and order information, (b) finance and invoicing tools to assist in managing orders, customer billing and fulfilment, (c) legal and compliance tools to assist in our contracting and compliance activities including credit checks, (d) consultants, contractors and other specialists to provide professional services, and (e) other vendors which support our business operation.
- **Further vendors:** we use trusted vendors to provide goods and services which support our business operations

In each case, our vendors and service providers are appointed under terms governing how they may process personal data on BPA’s behalf, where required under applicable law.

Law Enforcement and Legal Compliance

We also use and disclose personal information, as we believe to be necessary or appropriate: (a) under applicable law, including law outside your country of residence;

(b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our group entities; (f) to protect our rights, privacy, safety or property, and/or that of our group entities, you or others; (g) if we are involved in any discussions related to the sale of all or part of our business, and (h) 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 organisational measures to protect personal information under our control. We implement security measures appropriate to the nature of the processing and regularly review these measures.

If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by e-mailing privacy@bpaquality.co.uk

Do we transfer your data internationally?

We may transfer your personal information to our group entities, partners or vendors outside of the country in which the applicable data controller is based, including exporting data outside the US and EEA for the reasons set out in in this Privacy Notice (please see the 'Who might we share your personal information with?' section above).

We primarily transfer data to the USA, UK and EEA and with other jurisdictions, as necessary or appropriate to our business operations. Where required by law, we undertake a transfer impact assessment before a transfer takes place.

When we share your personal information, it will continue to be subject to one or more appropriate safeguards set out in the applicable law. These might be to a jurisdiction recognised as 'adequate' under UK or EU/EEA law, or through an approved transfer scheme, such as the use of standard contractual clauses in a form approved by regulators or other competent authorities. Our entities have entered into binding intra-group transfer agreements which recognise the standards of international data transfers.

How long do we keep your data for?

We will keep your personal information for the purposes set out in this Privacy Notice and in accordance with applicable privacy laws and relevant regulations. We will only keep your personal information for as long as necessary for these purposes.

How long we will keep your personal information considers:

- the length of time we have a relationship with you and provide services to you or our customer (for example, for as long as you have an account with us or keep using the services)
- if we are subject to a legal obligation (for example, certain laws require us to keep records of your transactions for a certain period of time before we can

delete them)

or

- if we need to retain information in case of a dispute or investigation, including to bring, defend and manage any litigation.

Your rights

In certain countries, you may have certain rights in relation to the personal information we process about you. Please refer to the section of this Privacy Notice for your country.

Contact Us

If you have a question or any feedback about how your personal information is processed or this Privacy Notice, please contact us by e-mailing privacy@bpaquality.co.uk

Our companies, where required by applicable law, have appointed a data protection officer. Please refer to the section of this Privacy Notice for your country for this contact information.

Complaints

If BPA cannot resolve your complaint, you may have the right to complain to a competent regulator or supervisory authority in your jurisdiction.

- If you are in the **UK**, the Information Commissioner's Office (ICO) is the supervisory authority. You can contact them via the link [here](#)
- If you are in the **EU/EEA**, you can find your local data protection authority [here](#)
- If you are in **Switzerland**, the Swiss Federal Data Protection and Information Commissioner can be contacted [here](#)
- If you are in **California**, The California Privacy Protection Agency is the supervisory authority. You can contact them [here](#)

United Kingdom, Switzerland, EU and the European Economic Area

If you are in United Kingdom ("UK"), Switzerland, the European Union ("EU") or European Economic Area ("EEA"), the following information also applies:

Rights

Rights in the UK/Switzerland/EU/EEA

If you are in the UK, Switzerland or the EU/EEA, you may have the right (subject to certain exceptions and limits) to:

- access a copy: You may confirm whether we are processing your personal information. If we are, you may request a copy of your personal information

(including the categories of personal information processed, the purpose of the processing and the recipients or categories of recipients).

We do have to consider the interests of others, and if you want to request more than one copy we may charge a fee.

- correct inaccurate personal information: You may have the right to correct inaccurate or incomplete personal information.
- limit our use of your personal information (restriction): In certain limited circumstances, you may have the right to request that we restrict processing of your personal information.
- have your personal information moved (portability): In certain circumstances, you may have the right to receive personal information concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit that data to another entity.
- object to our use of your personal information: In certain circumstances you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal information, including profiling, by us and we can be required to no longer process your personal information. For example, you have the right to object to our processing of your personal information on the basis of our legitimate interests, under certain conditions. You also have the right to object to our processing of your personal information for direct marketing purposes.

If we process your personal information using automated decision making which has a legal or similarly significant effect on you, you may have the right to request intervention in relation to such an automated decision so that you can express your view and to contest the decision.

- withdraw consent: 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. The most efficient way is to contact BPA (see Contact us below).

Whether based on consent or our legitimate interest, all our marketing emails include an 'unsubscribe' option and allow you to manage your email preferences.

- erasure: You may have the right to ask us to erase personal information concerning you, although this right applies in certain circumstances and we may be permitted to retain your personal information notwithstanding your request if an exception under data protection laws applies.

How to exercise your rights

To exercise any of your rights, the most efficient way to contact BPA is to email privacy@bpaquality.co.uk

Alternatively, you may contact our country-specific contacts as detailed under Contact us or the country-specific sections that follow.

We will typically be able to respond within one month. In some circumstances, for example if your request is complex, we may need longer. We will inform you if this is the case.

We may need to ask for additional information to verify your request and action your request. This helps us to protect personal information against fraudulent requests. If you do not provide sufficient information initially and do not respond to our request for additional information, we may be unable to action your request. We may ask you to complete a form in order to ensure your request is processed in accordance with applicable privacy laws.

If you have a complaint which has not been resolved to your satisfaction by BPA or its specifically appointed country representatives, please refer to Complaints above.

Contact us

You can contact us by e-mailing privacy@bpaquality.co.uk

You can also contact our country-specific contacts:

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 via our representative:

DataRep, The Cube, Monahan Road, Cork, T12 H1XY, Republic of Ireland - please ensure your request is addressed to DataRep.

UK: We have appointed a data protection team who can be contacted through the Contact Us section above

California

Rights in California

If you are a resident of California, the following information also applies:

This California Privacy Notice supplements the information contained in our Privacy Notice and applies solely to individual residents of the State of California (“consumers” or “you”). This California Privacy Notice provides additional information about how we collect, use, disclose and otherwise process personal information of consumers, either offline or online, within the scope of the California Consumer Privacy Act (“CCPA”), as amended by the California Consumer Rights Act (“CPRA”) (collectively, “California Privacy Law”).

If you are a California resident, please review this section below as it is applicable to your Personal Information (“California Personal Information”).

- Unless otherwise expressly stated, all terms in this California Privacy Notice have the same meaning as defined in our Privacy Notice or as otherwise defined in the CCPA.

California Personal Information

Depending on your online and offline interactions with us, BPA may collect and

process the following categories of California Personal Information:

- Identifiers
- Professional or employment-related information
- Internet or other electronic network activity information
- Audio, electronic, visual or similar information
- Inferences drawn from the information collected.

Certain California Personal Information that we collect about you may be considered sensitive personal information within the meaning of California Privacy Law.

BPA only uses and discloses sensitive personal information as necessary in connection with the performance of services and the provision of goods, compliance with federal, state, or local laws, and as otherwise permitted by California Privacy Law.

Sources

BPA generally sources the categories of California Personal Information identified above directly from you (for instance, when you provide information as part of a business transaction or otherwise) or from third parties, such as business partners and analytics providers.

We do not knowingly share the California Personal Information of individuals under 16 years of age, in a manner that constitutes a “sale” under California law.

Purposes of use

BPA uses California Personal Information for:

- Business purposes, including to:
- ensure our Services (as defined above) are presented to you in the most effective way on your device;
- diagnose problems with our server or administer our websites;
- analyse user traffic to understand how people use our Services;
- measure use of our websites and to improve the content of our websites and our services;
- reply to your form submissions, events, feedback, and enquiries;
- administer your access to our websites, online services, applications and mobile apps;
- improve our services;
- to ensure our premises remain safe and secure;
- for compliance, quality, training and other purposes.

Disclosure of California Personal Information

We may disclose the categories of California Personal Information described above for the business purposes described above to:

- Our group entities;

- o Our resellers, distributors, and business support partners;
- o Law enforcement officials, when required by law.

We may disclose Identifiers and Internet or other electronic network activity information for the commercial purposes described above to:

- o Third party services providers.

Retention of California Personal Information

- BPA retains your California Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained.

How long we will keep your personal information considers:

- the length of time we have a relationship with you and provide services to you or our customer (for example, for as long as you have an account with us or keep using the services);
- if we are subject to a legal obligation (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- if we may need to retain information in case of a dispute or investigation, including to bring, defend and manage any litigation.

California Personal Information Rights

If you are a California resident, you may have the right (subject to certain exceptions and limits) to:

- for certain categories of California Personal Information, request a list of what California Personal Information (if any) we disclosed to third parties for their own direct marketing purposes in the previous calendar year and the names and addresses of those third parties;
- request to know/access any or all of the following information relating to the California Personal Information we have collected about you or disclosed in the last 12 months, upon verification of your identity:
 - ❖ the specific pieces of California Personal Information we have collected about you;
 - ❖ the categories of California Personal Information we have collected about you;
 - ❖ the categories of sources of the California Personal Information we have collected about you;
 - ❖ the categories of California Personal Information that we have disclosed about you to third parties for a business purpose, and the categories of recipients to whom this information was disclosed;
 - ❖ the categories of California Personal Information we have sold about you (if any), and the categories of third parties to whom this information was sold; and
 - ❖ the business or commercial purposes for collecting or, if applicable, selling California Personal Information about you.

- request that we delete the California Personal Information we have collected from you, subject to certain exceptions.
- direct us not to sell or share California Personal Information we have collected about you to third parties now or in the future. If you are under the age of 16, you have the right to opt in, or to have a parent or guardian opt in on your behalf, to such sales.
- request correction of inaccurate California Personal Information that has been collected about you.
- limit our use of sensitive personal information (as the term is defined under California Privacy Law) we have collected from you or maintain about you to only what is necessary to provide our services.
- not receive discriminatory treatment for the exercise of the privacy rights conferred by the California Privacy Law.

If the exercise of the rights described above limits our ability to process your California Personal Information (such as in the case of a deletion request), we may no longer be able to provide you our products or services or engage with you in the same manner.

How to Exercise Your California Privacy Rights

- If you are a California resident, please email privacy@bpaquality.co.uk to exercise your rights or to ask us any questions about your California Personal Information collected or shared with third parties.
- When submitting your request, please include the specific nature of your request, referencing “Your California Privacy Rights,” as well as your first and last name, email address, and zip code or mailing address.
- BPA may apply any exceptions or other conditions available under law when responding to correction, deletion, or other requests.

Do Not Sell or Share My Information

As a California resident, you may also have the right to opt-out of the selling or sharing of your California Personal Information, as such terms are defined under California Privacy Law, if applicable.

We will not discriminate against you by offering you different pricing or products, or by providing you with a different level or quality of products, based solely upon this request.

Authorised Agents

To the extent that you elect to designate an authorised agent to make a request on your behalf, they must provide appropriate documentation including written signed permission from you, proof of your identity, and verification of their identity; or a valid, designated power of attorney as defined under the California Probate Code.

Contact Us

If you are a California resident and have any questions about this California Consumer Protection Act Privacy Notice addendum please email privacy@bpaquality.co.uk or contact us by submitting your request to FAO: The Privacy Team, BPA Corporate Facilitation Ltd, Milford House, Pynes Hill, Exeter EX2 5AZ.

Review

This Privacy Notice was reviewed on behalf of BPA Corporate Facilitation Ltd by Zeta Carpenter, HR Advisor in October 2024.

This notice will be reviewed by October 2025.



If you have any questions regarding the content of this privacy notice, please email privacy@bpaquality.co.uk.