

Privacy Policy BTM

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Welcome to BTM's privacy policy. We respect your privacy and committed to protecting your personal data.

This privacy policy sets out how BTM uses and protects any information that you give to us when you use this website. It is important that you read this privacy policy, together with any other privacy policies we may provide, so that you are fully aware of how and why we are using your data.

We are committed to treating your personal information responsibly and ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

We may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes.

If you have any questions, or would like to exercise your privacy rights, please follow the instructions in this privacy policy. See how to contact BTM about privacy below.

Our website

Our website sells therapy services which are aimed at business users and individuals. This website is not intended for children and we do not knowingly collect data relating to children.

Personal data which we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect a variety of information about customers and visitors to the website. This personal data falls into these categories:

Identity Data includes title, first name, last name, username or similar identifier and an encrypted version of your login/password. If you interact with us through social media, this may include your social media user name.

Contact Data includes billing address, delivery address, email address and telephone numbers.

Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.

Profile Data includes your username and password, purchases or orders made by you, preferences, feedback and survey responses, as well as any profile data which we have added (for example, using analytics and profiling).

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Usage Data includes information about how you use our website, products and services.

Tracking Data includes information we or others collect about you from cookies and similar tracking technologies, such as web beacons, pixels, and mobile identifiers.

Marketing and Communications Data includes your preferences in receiving direct marketing from us and our third parties and your communication preferences.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature to provide better content and service.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you. This includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. Nor do we collect any information about criminal convictions and offences.

If you choose not to share personal data with us, or refuse certain contact permissions, we might not be able to provide the products and services you've asked for.

How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or through

chat or social media.

This includes personal data you provide when you:

- sign up to receive our newsletter;
- make enquiries or request information be sent to you;
- create an account on our website;
- order our products or services;
- ask for marketing to be sent to you;
- engage with us on social media;
- enter a competition, promotion or survey;
- contact customer services
- leave comments or reviews on our products or services

Automated technologies or interactions. As you interact with us, including via the BTM's website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We may also collect Tracking Data when you use our website, or when you click on one of our adverts (including those shown on third party websites).

Third parties or publicly available sources. We may receive personal data about you from various types of third parties, including:

- Technical Data and/or Tracking Data from analytics providers, advertising networks and search information providers;
- Contact, Financial and Transaction Data from providers of payment and fraud prevention services;
- Identity and Contact Data from data partners; and
- Data from any third parties who are permitted by law or have your permission to share your personal data with us, such as via social media or review sites We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

How we use your personal data

- Where we need to perform the contract we are about to enter into or have entered into with you. For example, when you purchase our products, that's a contract.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example, when we carry out fraud screening as part of the check-out process.
- Where we need to comply with a legal or regulatory obligation. For example, keeping records of our sales for tax compliance.

Generally, we do not rely on consent as a legal basis for processing your personal data other than where the law requires it, for example in relation to sending certain direct marketing communications. Where our legal basis is consent, you have the right to withdraw consent any time.

See Explaining the legal bases we rely on to process personal data to find out more about the types of lawful basis that we will rely on to process your

personal data.

Explaining the legal bases we rely on to process personal data

The table below shows you a description of all the ways we plan to use personal data, and which of the legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	Identity contact	Performance of a contract with you
To process and deliver your order including: Manage payments, fees and charges. Collect and recover money owed to us	Identity Contact Financial Transaction Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (including to recover debts due to us)
To manage our relationship with you which will include: Notifying you about changes to our terms or privacy policy. Asking you to leave a review or take a survey	Identity Contact Profile Marketing and Communications	Performance of a contract with you Necessary to comply with a legal obligation. Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To deliver direct marketing to you	Identity Contact Profile Usage Marketing and Communications Tracking Technical	For most direct marketing communications, we rely on consent, however there are situations in which it is in our legitimate interests to use your personal data in this way

<p>To enable you to take part in a prize draw, competition or complete a survey</p>	<p>Identity Contact Profile Usage Marketing and Communications</p>	<p>Performance of a contract with you Necessary for our legitimate interests (to study how customers use our products/ services, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>Identity Contact Technical Tracking</p>	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p>
		<p>Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>Identity Contact Profile Usage Marketing and Communications Technical Tracking</p>	<p>Necessary for our legitimate interests (to study how customers use our products/ services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/ services, marketing, customer relationships and experiences</p>	<p>Technical Tracking Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>

To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity Contact Technical Usage Profile	Necessary for our legitimate interests (to develop our products/ services and grow our business)
To prevent and detect unlawful acts	Identity Contact Financial Transaction Technical Tracking	Necessary for our legitimate interests (to protect our business and our customers by way of undertaking fraud monitoring and suspicious transaction monitoring) Necessary to comply with a legal or contractual obligation to share personal data for the purposes of law enforcement
In order to resolve legal claims or disputes involving you or us	All relevant data categories, depending on the nature of the allegation or claim	Necessary to bring or defend a claim

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. We do not carry out any automated decision making.

Advertising, marketing and your communications preferences

We may use your Identity, Contact, Technical, Tracking, Usage and Profile Data to form a picture of what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you and tell you about them as part of direct marketing activities. We may carry out direct marketing by email, phone, text or post.

On our website, we always try hard to make it really clear what we are doing and what communications you will be sent, whether it's you deciding to sign up or as part of creating an account or the purchase journey – and you have a right at any time to change your mind and opt out. The easiest way to opt out is to use the unsubscribe link at the bottom of the communication.

We work with partners to try and promote the reach of our adverts and use analytics and re-targeting for this reason. We use Tracking Data to deliver relevant online advertising, including via websites and social media.

Tracking Data, and in particular cookies, help us to deliver website and social

advertising that we believe is most relevant to you and to potential new customers of SAFE. The cookies used for this purpose are often placed on our website by specialist organisations includes re-targeting.

Cookies can also tell us if you have seen a specific advert, and how long it has been since you have seen it. This is helpful, because it means we can control the effectiveness of our adverts and control the number of times people might be shown our adverts. Cookies also help us understand if you've opened a marketing email.

If you want more information about Tracking Data, in particular cookies, see Cookies below.

Almost all the cookies that relate to advertising are part of third party online advertising networks. We do not control cookies which are set by advertising networks.

Cookies

You can see from Advertising, marketing and your communications preferences above, that cookies are a tool which are used for advertising. That is just part of why cookies are used.

Cookies help BTM work better like it being easy to log in and move from page to page, and things staying in your cart while you go off and look at other pages.

Other cookies collect information about how visitors use BTM for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and used to improve how BTM works.

There are also cookies that allow BTM to remember choices you make such as your user name or the region you are in and provide enhanced, more personal features.

There are cookies that collect information about your browsing habits in order to make advertising delivered to you more relevant to you and your interests (see Advertising, marketing and your communications preferences above). They are usually placed by advertising networks with our permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

When you use BTM, your device or browser may be sent cookies from third parties, for example when using embedded content and social network links. It's important for you to know that we have no access to or control over cookies used by these companies or third-party websites. We suggest you check the third-party websites for more information about their cookies and how to manage them.

Please find below more information about the cookies we use, including who they belong to:

Google DoubleClick, test_cookie, IDE

Google Analytics, _ga, visitor_id, _gat, _ga_

Bing, PPUi

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in this privacy policy. We may also share your personal data if the law otherwise allows it.

We may share personal data with the following categories third parties:

- Suppliers and service providers (such as technology service providers, payment processing and fraud prevention providers, manufacturers and post and courier services);
- auditors and professional advisers like bankers, lawyers, accountants and insurers; and
- government, regulators and law enforcement.

We share data with third parties connected to advertising, retargeting and analytics. Please see Cookies above, including the cookie list, for more information about who those third parties are.

We may also share data with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

Data retention

We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers including Contact, Identity, Financial and Transaction Data for 7 years after they stop being customers for tax purposes.

In some circumstances we may anonymise your personal data, so that it can no longer be associated with you for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your legal rights

If the General Data Protection Regulation applies to you because you are in the European Union, you have rights under data protection laws in relation to your personal data:

- The right to be informed – that's an obligation on us to inform you how we use your personal data (and that's what we're doing that in this privacy policy);
- The right of access – that's a right to make what's known as a 'data subject access request' for copy of the personal data we hold about you;
- The right to rectification – that's a right to make us correct personal data about you that may be incomplete or inaccurate;
- The right to erasure – that's also known as the 'right to be forgotten' where in certain circumstances you can ask us to delete the personal data we have about you (unless there's an overriding legal reason we need to keep it);
- The right to restrict processing – that's a right for you in certain circumstances to ask us to suspend processing personal data;
- The right to data portability – that's a right for you to ask us for a copy of your personal data in a common format (for example, a .csv file);

- The right to object – that’s a right for you to object to us processing your personal data (for example, if you object to us processing your data for direct marketing); and
- Rights in relation to automated decision making and profiling – that’s a right you have for us to be transparent about any profiling we do, or any automated decision making.

If you wish to exercise any of the rights set out above, please contact us.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details below.

You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, please contact us in the first instance.

How to contact us about privacy

If you have any questions about this privacy policy, or would like to exercise any of your rights, please email us at beyondthemats.infor@gmail.com

Changes to this privacy policy

ICO is issuing updated guidance about how businesses should follow it. Accordingly, you may see updates to our privacy policy over the coming months. Be sure to check in.

Thank you.