



Privacy and Cookies Policy

BTCSOFTWARE Limited (“We”) understand that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits our websites, www.btcsoftware.co.uk, admin.btcsoftware.co.uk and www.btchub.co.uk (“our Sites”) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links 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. When you leave our website, we encourage you to read the privacy notice of every website you visit.

We act as a controller of personal data in its own right and is responsible for your personal data in connection with its activities.

Please read this Privacy Notice carefully and ensure that you understand it. Your acceptance of our Privacy Notice is deemed to occur upon your first use of our Sites. If you do not accept and agree with this Privacy Notice, you must stop using our Sites immediately.

Information About Us

- BTCSOFTWARE Limited
- Registered in England under company number 04539303.
- Registered address: Lyndale House, 24a High Street, Addlestone KT15 1TN.
- VAT number: 817 8602 13
- Data Protection Officer: Ian Katté.
- Email: DPO@BTCSoftware.co.uk
- Telephone: 0345 214 5030 or +44 1932 840572
- Address: Lyndale House, 24a High Street, Addlestone KT15 1TN.



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What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) 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. The personal data that we use is set out in Part 5, below.

What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

1. The right to be informed about our collection and use of your personal data. This Privacy Notice 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 11.
2. The right to access the personal data we hold about you. Part 10 will tell you how to do this.
3. 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 11 to find out more.
4. 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 have. Please contact us using the details in Part 11 to find out more.
5. The right to restrict (i.e. prevent) the processing of your personal data.

6. The right to object to us using your personal data for a particular purpose or purposes.
7. 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.

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 11.

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 our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

What Personal Data Do You Collect and How?

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name (including title)
- Address
- Email address
- Telephone number and/or mobile number
- Business name
- Payment information
- Data you may submit for technical support
- Technical data (including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform)

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- Information about your visit including the full Uniform Resource Locators (URL) clickstream to, through and from our sites including date and time; products you viewed or searched for; page response times, download errors, lengths or visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page and any phone number used to call our customer service number.

We collect personal data in the following ways

- From forms completed on our sites or from correspondence with us by phone, email or otherwise. This includes information you provide when you register to use our sites, subscribe to our service, search for a product, place an order on our sites, enter a competition, promotion or survey and when you report a problem on our sites.
- In some cases personal data may be supplied by third parties, including for example exhibition organisers, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers and credit reference agencies.
- Cookies Our sites use cookies to distinguish you from other users of our sites. This helps us to provide you with a good experience when you browse our sites and also allows us to improve our sites. By continuing to view and/or use the services provided by our sites, you are consenting to use of our cookies. We may use the following cookies:
 - Strictly necessary cookies. These are cookies that are required for the operation of our sites. They include, for example, cookies that enable you to log into secure areas of our sites, use a shopping cart or make use of e-billing services.
 - Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our sites when they are using them. This helps us to improve the way our sites work, for example, by ensuring that users are finding what they are looking for easily.

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- Functionality cookies. These are used to recognise you when you return to any of our sites. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Targeting cookies. These cookies record your visits to our sites, the pages you have visited and the links you have followed. We will use this information to make our sites and the advertising displayed on them more relevant to your interests. We may also share this information with third parties for this purpose.

How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for the following purposes:

- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us.
- To provide you with information about other goods and services that we offer that are similar to those that you have already purchased or enquired about.
- To provide you with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (email or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, we will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data.
- To notify you about changes to our services/goods.
- To ensure that contact from our sites is presented in the most effective manner for you and for your computer.



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- To administer our sites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To improve our sites to ensure that content is presented in the most effective manner for you and for your computer.
- To allow you to participate in attractive features of our service when you choose to do so.
- As part of our efforts to keep our sites safe and secure.
- To measure or understand the effectiveness of advertising we serve to you and others and to deliver relevant advertising to you.
- To make suggestions and recommendations to you and other users of our sites about goods or services that may interest you or them.
- We may combine the information from other sources with the information you give us and information we collect about you. We may use this information and the combined information for the purposes set out above.

We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out of marketing communications.

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):

- Technical support
- Personal information relating to technical support queries will be kept for no longer than seven years.



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- Payment information
- Any personal information relating to payment details will be deleted when there is no legitimate use to keep it.

If you have any further questions regarding the retention of personal data please contact the Data Protection Officer.

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

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (EEA). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional 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 GDPR. All information you provide to us is stored on our secure servers. Any payment transaction will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Where we transfer your data to a third party based in the US, this may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar levels of data protection to those in Europe. More information is available from the European Commission. Please contact us using the details below in Part 11 for further information about the particular data protection mechanism used by us when transferring your personal data to a third country. The security of your personal data is essential to us, and to protect your data we have procedures in place to manage any suspected personal data breach and will notify the regulator of a breach where we are legally required to do so.

Do You Share My Personal Data?

- We may need to/or be legally required to share certain personal data under the following circumstances:
- In the event that we sell or buy any business assets, in which case we may disclose your personal data to the prospective seller or buyer of such business assets. If the use or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets. In the event that we sell, transfers, or merges parts of our operation or assets with a third-party organisation, then the new owners or operators may use your personal data in the same way as set out in this privacy notice.
- If we are required to exchange information with other companies and organisations for the purposes of fraud protection and credit risk reduction (including debt collection agencies).
- If we are required to exchange information to meet regulatory obligations including statutory or regulatory reporting, the detection or prevention of unlawful acts, protecting our rights, property or those of our customers/and or others and are involved in legal proceedings, a court order, or the instructions of a government authority.
- Government departments where reporting is mandatory under applicable law
- Contracts with third parties to supply products to you on our behalf which may include payment processing and marketing

Your personal data may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

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We require all third parties to respect the security of your personal data and to treat it in accordance with the law and our own specific and stringent security requirements. We do not allow the above 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.

If any of your personal data is required by 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 8.

If any personal data is transferred outside of the EEA, 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 GDPR, as explained above in Part 8.

If you would like any further information about the third parties that your personal data is shared with please contact the Data Protection Officer.

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 11. 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. To request a copy of the form contact the Data Protection Officer. 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



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charged to cover our administrative costs in responding. We will respond to your subject access request within 40 calendar days 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.

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 (for the attention of the Data Protection Officer)

- Email: DPO@BTCSoftware.co.uk
- Telephone: 0345 214 5030 or +44 1932 840572
- Address: Lyndale House, 24a High Street, Addlestone KT15 1TN.

Changes to this Privacy Notice

We may change this Privacy Notice 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 to our Privacy Notice will be made available on our website and, where appropriate, notified to you by email.