



## Privacy Notice & Cookie Policy

Last updated May 2018

Your privacy is important to **BTS Digital Ltd (By the Scruff)**. We developed this Privacy Notice to provide you with information on how we process your personal data when you commission **BTS Digital Ltd**, interact with our customer support specialists, visit [bythescruff.com](http://bythescruff.com) or visit other **BTS Digital Ltd** websites that include a link to this Privacy Notice

### Data Controller

We are **BTS Digital Ltd**, the data controllers.

You can contact us at [getit@bythescruff.com](mailto:getit@bythescruff.com), or calling 0207 033 4269, if you have any questions.

### Your Rights

If you reside in the European Union, you have the right under the General Data Protection Regulation:

1. To be informed about our processing of your personal data
2. To have your personal data corrected if it is inaccurate and to have incomplete personal data completed
3. To object to processing of your personal data
4. To restrict of processing of your personal data
5. To have your personal data erased (the "right to be forgotten")
6. To request access to your personal data and information about how we process it
7. To move, copy or transfer your personal data ("data portability")
8. In relation to automated decision making, including profiling

You have the right to lodge a complaint with supervisory authority - **Information Commissioner's Office (ICO)**. It has enforcement powers and can investigate compliance with data protection law.

**Help line** 0303 123 1113

**Web site:** <https://ico.org.uk>

**By post:**

Customer Contact

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

SK9 5AF

“Personal data” is information relating to an identified or identifiable natural person.

#### THE TYPES OF PERSONAL DATA WE COLLECT AND USE

Full name and personal details including contact information (e.g. home and business address, email address, home/business and mobile numbers)

**Information about Other People:** via our websites, you can submit personal information about other people. For example, you might submit the name and e-mail address of any individual to send a **BTS Digital Ltd** and want it sent directly to the recipient, you may be required to submit the recipient's name and address. The personal information that may be collected about other people at these pages include the recipient's name, address, e-mail address, and telephone number. We do not use the recipient's personal information for any other purpose unless given direct permission to do from the recipient.

#### Purposes and Legal Grounds:

1. **BTS Digital Ltd** processes your personal information as necessary to perform our contract obligations with you for the service. **BTS Digital Ltd** also processes your email address for the purpose of sending you important information about your **BTS Digital Ltd** products, apps or account, such as service status, important safety information or material changes to this Privacy Policy. The legal ground for processing your details for this purpose is **contract**.
2. **BTS Digital Ltd** also processes your email address to associate it with your **BTS Digital Ltd** account when you interact with our customer support representatives. The legal ground for this processing is our **legitimate interest** in providing quality customer support.
3. If you provide your opt-in consent to receiving marketing information from **BTS Digital Ltd**, we will also process your email address for the purpose of sending you marketing information about **BTS Digital Ltd** products and apps. The legal ground for processing your email address for this purpose is your **consent**. You may withdraw your consent at any time by changing your preferences in your **BTS Digital Ltd** account or through the unsubscribe link at the bottom of our marketing emails.

#### Transfers and Shares of Personal Data

**BTS Digital Ltd** is a global business. To offer our products, apps and services, we may need to transfer your personal data to other countries.

When you create a **BTS Digital Ltd** account, add personal data in your account profile, or upload data to your **BTS Digital Ltd** account, your personal data will be collected and stored on **BTS Digital Ltd** servers in the EU. Personal data regarding individuals who reside in a country in the European Economic Area or in Switzerland is controlled by **BTS Digital Ltd**.

Subject to applicable data protection law we may share your personal data with:

- Sub-contractors and other persons who help us provide our products and services
- Our legal and other professional advisors, including our auditors
- Fraud prevention agencies, credit reference agencies, and debt collection agencies
- Courts, to comply with legal requirements, and for the administration of justice
- In an emergency or to otherwise protect your vital interests
- Anyone else where we have your consent or as required by law

## Cookies and Similar Technologies

To help analyse how you and other visitors navigate **BTS Digital Ltd** websites, and compile aggregate statistics about site usage and response rates, we, with assistance from third-party analytics service providers, collect certain information when you visit our site. This information includes IP address, geographic location of the device, browser type, browser language, date and time of your request, time of your visit(s), page views and page elements (e.g., links) that you click. We may use cookies, pixel tags, web beacons, clear GIFs or other similar tools on our site or in our email messages to assist us in collecting and analyzing such information. We use this information to provide better, more relevant content on our site, to measure the effectiveness of advertisements, to identify and fix problems, and to improve your overall experience on our site. We may also engage one or more third-party service providers to provide online advertisements on our behalf. They may use a pixel tag or other similar technology to collect information about your visits to sites, and they may use that information to send you targeted advertisements. For more information regarding this practice and to opt-out of such collection and use of this information by our third-party service providers, please see [Networkadvertising.org](http://Networkadvertising.org).

If you do not want information collected through the use of these technologies, there is a simple procedure in most browsers that allows you to automatically decline many of these technologies, or to be given the choice of declining or accepting them.

If you reside in the European Union or other jurisdiction that requires us to obtain your consent to use cookies on our sites, then you will have an opportunity to manage your cookie preferences on the sites; except that certain cookies are required to enable core site functionality, and you cannot choose to disable those cookies.

Here is list of cookies deployed by **BTS Digital Ltd**

Name	Use of
autoinvite_callback	Live Chat
lc_window_state	Live Chat
__lc.visitor_id.xxx	Live Chat
_gat_UA	Google Analytics
_gid	Google Analytics
_ga	Google Analytics
gwcc	Google
addevent_track_cookie	Addthis

Here examples of third-party providers of analytics and similar services we currently use:

### **Analytics Services:**

- **Google:** Google Analytics is used to track site statistics and user demographics, interests and behavior on websites. We also use Google Search Console to help understand how our website visitors find our website and to improve our search engine optimization. [Find out more information](#) about how this analytics information

may be used, how to control the use of your information, and how to opt-out of having your data used by Google Analytics.

- **Leadforencis:** Web analytics. Find out more information about Leadforencis privacy policies [here](#)

#### **Advertising Services:**

- **LinkedIn:** Business focused social network. Find out more information about LinkedIn privacy policy [here](#).
- **DoubleClick by Google:** advertising on Internet. Find out more information about Google privacy policies [here](#)
- **Facebook:** Social network. Find out more information about Facebook privacy policy [here](#)
- **Twitter:** Social network. Find out more information about Facebook privacy policy [here](#)

#### **Others:**

- **AddThisEvent:** Calendar service for sites and mailist. Find out more information about AddThisEvent privacy policy [here](#)
- **Live Chat:** Online customer engagement service. Find out more information about Live Chat Inc. privacy policy [here](#)
- **Maps by Google:** Mapping service. Find out more information about Google privacy policies [here](#)
- **Wordpress and Gravatar:** Content management system by Automattic. Find out more information about Automattic privacy policy [here](#)
- **Youtube by Google:** Video services. Find out more information about Google privacy policies [here](#)
- **Trustpilot:** Online review community. Find out more information about Trustpilot privacy policy [here](#)
- **Bugherd:** Software bug tracking system. Find out more information about Bugherd privacy policy [here](#)

## **Retention of Personal Data**

The following criteria are used to determine data retention periods for your personal data:

- We will retain your personal data as long as your **BTS Digital Ltd** account is considered to be active.
- We will retain technical information about your visits to **BTS Digital Ltd** websites for **12 months**

## **Children**

We request individuals under **18** not provide personal data to **BTS Digital Ltd**. If we learn that we have collected the personal data from a child under **18**, we will take steps to delete the information as soon as possible.

## **Security**

We have implemented measures in an effort to maintain the confidentiality of all personal information in our custody and control, including only providing access to personal information to employees and authorised service providers who require such information for

the purposes described in this document. We maintain administrative, technical and physical safeguards in an effort to protect against unauthorised access, use, modification and disclosure of personal information in our custody and control.

- To provide you with an increased level of security online, access to your personal information on certain of our websites may be protected with a password you select.
- We strongly recommend that you do not disclose your password to anyone.
- We will never ask you for your password in any unsolicited communication.

## **Privacy Policy Updates**

We may update this Privacy Policy from time to time as we add new products and apps, as we improve our current offerings and as technologies and laws change.

We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. This notice will be provided by email or by posting notice of the changes on the **BTS Digital Ltd** websites and apps that link to this Privacy Policy.

You can determine when this Privacy Policy was last revised by referring to the “Last updated” legend at the top of this page. Any changes will become effective upon our posting of the revised Privacy Policy.