



PRIVACY POLICY

Introduction

Billi (UK) LLP respects your privacy and is committed to protecting your personal data.

This Privacy Policy tells you the types of information we collect about you when you visit our websites or which we otherwise obtain directly from you or from a third party, how we use that information, and the instances in which we share your information. This Privacy Policy may change from time to time so please check this policy regularly.

Our website, products and services are not intended for children and we do not knowingly collect data relating to children.

For the purposes of this Privacy Policy, the term "personal data" means any information which identifies you or which allows you to be identified when combined with other information.

1. Important information and who we are

Controller

Billi (UK) LLP is made up of different legal entities, details of which can be found [here](#). This Privacy Policy is issued on behalf of the Billi (UK) LLP Group so when we mention "Billi (UK) LLP", "we", "us" or "our" in this Privacy Policy, we are referring to the relevant company in the Billi (UK) LLP Group responsible for processing your data. Billi (UK) LLP Holdings Limited is the controller and responsible for this website.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this Privacy Policy. 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 set out below.

Contact details

Full name of legal entity: Billi (UK) LLP

Title of data privacy manager: Stephanie Boyce - HR, Legal & Compliance Manager

Email address: marketing@billi-uk.com

Postal address:

Billi (UK) LLP, 6b Central Avenue, St Andrews Business Park, Norwich, NR7 0HR



You have the right to make a complaint at any time The Information Commissioner's Office. We would, however, appreciate the chance to deal with your concerns before you approach them, so please contact us in the first instance.

Changes to the Privacy Policy and your duty to inform us of changes

This version was last updated on 14th May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

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. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

In connection with the conduct of our business, we may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, date of birth.
- **Contact Data** includes work address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us including the type of card used for a particular transaction (but not any other card details).
- **Technical and Usage Data** includes information about how you access and use our websites such as your 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 our websites, the pages you have visited on our websites and the links you have followed on them.
- **Profile Data** includes your username and password, purchases or orders made by you, your job title, your employer, your interests, preferences, feedback and survey responses.
- **Employment Data** includes your current and past employment experience, qualifications, skills, interests and any other information disclosed by you in relation to an application for a role within Billi (UK) LLP.



- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We 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 Technical Data to calculate the percentage of users accessing a specific website feature. 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.

3. 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 and Contact Data in person, or by filling in forms or by corresponding with us by post, phone, email, social media or otherwise. This includes personal data you provide when you:
 - request our products or services;
 - meet with one of our employees;
 - participate in an event which we have organised;
 - complete a form on our website requesting us to contact you;
 - subscribe to our publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey;
 - submit an application for a role within Billi (UK) LLP; or
 - make a complaint or give us some feedback.
- **Automated technologies or interactions.** As you interact with our website and call centres, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy [here](#) for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:



- Technical Data from the following parties:
 - (a) analytics providers;
 - (b) advertising networks; and
 - (c) search information providers.
- Identity and Contact Data from data brokers or aggregators.
- Identity and Contact Data from publicly available sources such as Companies House.
- Employment, Identity and Contact Data from third party recruitment agencies.

4. How we use your personal data

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:

- Where it is necessary for our legitimate interests (or those of a third party) and we have assessed that your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data. You have the right to opt out of receiving marketing at any time by [contacting us](#).

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

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. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To manage our relationship with you and your business which will include: (a) Processing and delivering orders;	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Profile	(a) Necessary for our legitimate interests (to manage our customer relationships and be able to provide our products and services, to recover debts due to)

<p>(b) Managing payments, fees and charges;</p> <p>(c) Collecting and recovering money owed to us;</p> <p>(d) Dealing with your enquiries and complaints;</p> <p>(e) Notifying you about changes to our terms or privacy policy;</p> <p>(f) Asking you to leave a review or take a survey.</p>	<p>(f) Marketing and Communications</p>	<p>(b) Necessary to comply with a legal obligation</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>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical and Usage</p>	<p>(a) 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>(b) 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>(a) Identity</p> <p>(b) Contact</p> <p>(c) Marketing and Communications</p> <p>(d) Technical and Usage</p> <p>(e) Profile</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>(a) Technical and 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>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical and Usage</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>



	(d) Profile	
To process your application for a role within Billi (UK) LLP	(a) Identity (b) Contact (c) Employment	(a) Necessary for our legitimate interests (to consider your application for a role within Billi (UK) LLP) (b) Performance of a contract with you (c) Necessary to comply with a legal obligation

Marketing

We strive to provide you with choices regarding marketing and advertising.

We may use your Technical Data to form a view on 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.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [contacting us](#) at any time.

Cookies

Our website uses cookies and similar technologies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve our website. We may also use such technologies to track you across the Internet and to display targeted advertisements to you on third party websites and social media platforms based on your preferences and likely interests.

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. For more information about the cookies we use, please see [here](#).

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- Other companies in the Billi (UK) LLP Group.
- Our third party service providers who perform functions on our behalf in connection with the operation of our business such as IT service providers and system administrators, third parties who host and manage data, deliver our products and services, conduct reference and criminal records checks on candidates on our behalf etc.
- Professional advisers including lawyers, bankers, auditors and who provide consultancy, banking, legal, insurance and accounting services.
- Our third party advertising partners to advertise products to you on third party sites which are tailored to meet your preferences and likely interests.
- Our third party analytics partners to analyse website traffic and understand customer needs and trends.
- Third parties if we are required to do so by law, or if we believe that such action is necessary to: (a) fulfil a government, or regulatory authority request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, our websites or customers.
- 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.

6. International transfers

This section applies where you are located in the European Union.

We may share your personal data within the Billi (UK) LLP Group. This will involve transferring your data outside the European Economic Area (EEA).

Our third party service providers may be based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).
- Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. 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. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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.

8. Data retention

How long will you use my personal data for?

We will only retain 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.

You can request details of retention periods for different aspects of your personal data by [*contacting us*](#).

In some circumstances you can ask us to delete your data: see below for further information.

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.

9. Your legal rights

Where you are located in the European Union you have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully



exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms (other than in the case of direct marketing).

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please [contact us](#).

No fee usually required

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 clearly unfounded,



repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

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.

Time limit to respond

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.