

BATM Advanced Communications Limited – Privacy Policy

1. Introduction

We are BATM Advanced Communications Limited (referred to as **BATM, we, us** and **our** in this Privacy Policy), a company incorporated and registered in Israel with company registration number 520042813 and whose registered office address is at Neve Ne'eman Industrial Area, 4 Ha'harash Street, POB 7318, 4524075 Hod Hasharon, Israel.

The information set out in this Privacy Policy is provided to individuals whose personal data we process (**you** or **your**) as data controller, in compliance with our obligations under Articles 13 and 14 of the General Data Protection Regulation 2016/679 (**GDPR**).

To make this information clear, we have divided the data we receive into the following groups and corresponding Schedules, where each of which refers to: the particular category of information we collect and retain; from where we obtain the information; the purpose and legal basis of processing; and to whom we will (if applicable) disclose the information:

- Schedule 1* *Data about our customers, and all individuals in respect of whom we have acquired personal information in connection with any products or services offered by us (including directors, shareholders, consultants, employees or other personnel of our customers)*
- Schedule 2* *Data about our shareholders and/or investors*
- Schedule 3* *Data about our suppliers and supplier personnel*
- Schedule 4* *Data about individuals who apply for employment with us*
- Schedule 5* *Data about our directors and staff, and former directors and staff and other individuals who spend time with us (such as consultants and secondees)*

In addition to the above, individuals who interact with us in any of the above capacities should also refer to the following:

- Schedule 6* *Data collected about staff and visitors to our office*
- Schedule 3* *Data collected about casual visitors to our site*

Please note that this Privacy Policy does not apply to any personal data provided to us by any of our subsidiaries within the BATM group of (**BATM Group**). The data controller in these cases will be the relevant subsidiary of BATM (**BATM subsidiary**), with which we have entered into contractual or other arrangements in relation to the processing of that personal data. If you are an actual or potential customer, supplier, or employee of a BATM subsidiary and have any queries regarding the use of your personal data or wish to access your personal data, you should contact the relevant BATM subsidiary directly (or contact us, and we will try to assist with directing you to the relevant person).

2. Data controller details

- 2.1 We are the data controller in relation to the processing of the personal information that you provide to us. Our contact details are as follows:
- 2.1.1 Address: Neve Ne'eman Industrial Area, 4 Ha-harash Street, POB 7318, 4524075 Hod Hasharon, Israel.
 - 2.1.2 Telephone number: +972-9-8662525
 - 2.1.3 Email address: privacy@batm.com (please include "Personal Data Request" in your subject heading to ensure it receives the correct attention).

3. International transfers

We will not transfer personal data relating to you to a country which is outside of Israel or the European Economic Area (**EEA**) unless:

- 3.1 the country or recipient is, like Israel, covered by an adequacy decision of the Commission under GDPR Article 45;
- 3.2 appropriate safeguards have been put in place which meet the requirements of GDPR Article 46 (for example using the European Commission's Standard Model Clauses for transfers of personal data outside the EEA); or
- 3.3 one of the derogations for specific situations under GDPR Article 49 is applicable to the transfer. These include (in summary):
 - 3.3.1 the transfer is necessary to perform, or to form, a contract to which we are a party:
 - 3.3.1.1 with you; or
 - 3.3.1.2 with a third party where the contract is in your interests;
 - 3.3.2 you have provided your explicit consent to the transfer; or
 - 3.3.3 the transfer is of a limited nature, and is necessary for the purpose of our compelling legitimate interests.

4. Retention of personal data

Our retention and deletion policy can be found in Schedule 1.

5. Your rights in respect of your personal data

- 5.1 You have the following rights under the GDPR:
- 5.1.1 **right to access:** the right to request certain information about, access to and copies of the personal information about you that we are holding (please note that you are entitled to request one detailed summary of the personal information that we hold about you at no cost, but for any further copies, we reserve the right to charge a reasonable fee based on administration costs); and
 - 5.1.2 **right to rectification:** the right to have your personal information rectified if it is inaccurate or incomplete; and

- 5.2 in certain circumstances, you will also have the following rights:
- 5.2.1 **right to erasure/“right to be forgotten”**: the right to withdraw your consent to our processing of the data (if the legal basis for processing is based on your consent) and the right to request that we delete or erase your personal information from our systems (however, this will not apply if we are required to retain the information for compliance with any legal obligation);
 - 5.2.2 **right to restriction of use of your information**: the right to stop us from using your personal information or limit the way in which we can use it;
 - 5.2.3 **right to data portability**: the right to request that we return any information you have provided in a structured, commonly used and machine-readable format, or that we send it directly to another company, where technically feasible; and
 - 5.2.4 **right to object**: the right to object to our use of your personal information including where we use it for our legitimate interests or for marketing purposes.
- 5.3 Please note that if you withdraw your consent to the use of your personal information for purposes set out in our Privacy Policy, we may not be able to carry out our contractual obligations to you or provide you with access to all or certain parts of our services.
- 5.4 If you consider our use of your personal information to be unlawful, you have the right to lodge a complaint with a supervisory authority. In the UK, this is the Information Commissioner’s Office. Please see further information on their website: www.ico.org.uk.

6. **Automatic decision making**

We do not make decisions based solely on automated data processing, including profiling.

7. **Security**

- 7.1 We keep your information protected by taking appropriate technical and organisational measures to guard against unauthorised or unlawful processing, accidental loss, destruction or damage. For example:
- 7.1.1 where appropriate, data is encrypted when transiting on our system or stored on our databases;
 - 7.1.2 we have implemented safeguards in relation to access and confidentiality in order to protect the information held within our systems; and
 - 7.1.3 we frequently carry out risk assessments and audits to monitor and review threats and vulnerabilities to our systems to prevent fraud.
- 7.2 While we will do our best to protect your personal information, we cannot guarantee the security of your information which is transmitted via an internet or similar connection. It is important that all details of any username, password and/or other identification information created to access our servers are kept confidential by you and should not be disclosed to or shared with anyone.

8. **Changes to this Privacy Policy**

We may amend this Privacy Policy from time to time, for example to keep it up to date, to implement minor technical adjustments and improvements or to comply with legal requirements. We will always update this Privacy Policy on our website, so please try to read it when you visit the website (the “last updated” reference tells you when we last updated our Privacy Policy).

Last updated January 2019

Schedule 1

Data about our customers and all individuals in respect of whom we have acquired personal information in connection with any products or services offered by us (including directors, shareholders, consultants, employees or other personnel of our customers)

What we collect:	We may use your information for the following purposes, based on the following legal grounds:	Recipients:
<ul style="list-style-type: none"> • Contact details such as your name, home/work addresses, email address, landline/mobile phone or fax numbers. • Employment information such as your position/title, employment history, professional specialisms and qualifications. • Login details for Members Area of www.batm.com such as your username and password • Any other information provided by customers via phone, email, or in person 	<ul style="list-style-type: none"> • If it is necessary for the performance of our contract or for the purposes of entering into a contract: for the purpose of negotiating and entering into contractual arrangements with you, in the course of providing our products and services e.g. contacting individuals to obtain instructions and discuss your requirements, or enabling you to log-in and use your “Members Account” of www.batm.com. • If it is in our legitimate business interests to do so: for internal record keeping for administration purposes, for the purpose of communications in relation to establishing a customer relationship, obtaining evidence of identity and credit history of our customers (and personnel at our customers), communications regarding our service and fees, for insight purposes (e.g. to analyse market trends and demographics, and develop the service which we offer to you or other individuals in the future) and sending information to you about products and services which we think may be of interest to you for marketing purposes. • Compliance with a legal obligation: in order to prevent fraud or money laundering or to comply with any other legal or regulatory requirements. • Consent: where we have requested your consent and you have provide it (e.g. where you have signed up to receive our newsletter) 	<p>How we share information</p> <ol style="list-style-type: none"> 1. Please note that personal information we are holding about you may on the legal grounds set out in this Privacy Policy, be shared with and processed by: <ol style="list-style-type: none"> 1.1 regulators (such as the UK Financial Conduct Authority) or other third parties (such as the London Stock Exchange) for the purposes of monitoring and/or enforcing our compliance with any legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts; 1.2 credit reference and fraud prevention agencies; 1.3 other parties and/or their professional advisers involved in a matter where required as part of the conduct of the services; 1.4 shareholders of BATM; 1.5 our own professional advisers and auditors for the purpose of seeking professional advice or to meet our audit responsibilities (such as our legal counsel (Fladgate LLP and Lipa Meir & Co), our auditors (Brightman Almagor Zohar & Co) and our financial advisors (Shore Capital)); 1.6 our service providers and agents (including their subcontractors) or third parties which process information on our behalf (e.g. internet service and platform providers, our bankers (Bank Hapoalim and Bank Leumi), our PR consultants (Luther Pendragon), our registrars (Link Market Services and Link Asset Services (Jersey) Limited), payment processing providers and those organisations we engage to help us send communications to you) so that they may help us to provide you with the products and services and information you have requested; and

<ul style="list-style-type: none"> • Payment information such as bank details and transaction history. 	<ul style="list-style-type: none"> • If it is necessary for the performance of our contract: for the purpose of making or receiving payments in the course of providing our services. • If it is in our legitimate business interests to do so: for internal record keeping for administration purposes, for the purpose of retaining evidence of payment transactions, for insight purposes (e.g. to analyse market trends and demographics in relation to our fees), for establishing our customer's ability to pay costs and to develop the service which we offer to you or other individuals in the future). • Compliance with a legal obligation: in order to prevent fraud or money laundering or to comply with any other legal or regulatory requirements. 	<p>1.7 another organisation to whom we may transfer our agreement with you or if we sell or buy (or negotiate to sell or buy) our business or any of our assets (provided that adequate protections and safeguards are in place).</p>
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Schedule 2
Data about our shareholders and investors

What we collect:	We may use your information for the following purposes, based on the following legal grounds:	Recipients:
<ul style="list-style-type: none"> • Contact details such as your name, home/work address. • Shareholding/financial details such as size of shareholding. 	<ul style="list-style-type: none"> • If it is necessary for the performance of our contract or for the purposes of entering into a contract: for the purpose of negotiating and entering into contractual agreements with you as a shareholder, or potential shareholder, in BATM. • If it is in our legitimate business interests to do so: for internal record keeping for administration purposes, for the purpose of communications in relation to establishing a relationship with our shareholders, obtaining evidence of identity of our shareholders and for insight purposes (e.g. to analyse the make-up of our ownership) and sending information to you about products and services which we think may be of interest to you for marketing purposes. • Compliance with a legal obligation: in order to prevent fraud or money laundering or to comply with any other legal or regulatory requirements. 	<p>How we share information</p> <ol style="list-style-type: none"> 1. Please note that personal information we are holding about you may on the legal grounds set out in this Privacy Policy, be shared with and processed by: <ol style="list-style-type: none"> 1.1 regulators (such as the UK Financial Conduct Authority) or other third parties (such as the London Stock Exchange) for the purposes of monitoring and/or enforcing our compliance with any legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts; 1.2 other parties and/or their professional advisers involved in a matter where required as part of the conduct of the services; 1.3 shareholders of BATM; 1.4 our own professional advisers and auditors for the purpose of seeking professional advice or to meet our audit responsibilities (such as our legal counsel (Fladgate LLP and Lipa Meir & Co), our auditors (Brightman Almagor Zohar & Co) and our financial advisors (Shore Capital)); 1.5 our service providers and agents (including their subcontractors) or third parties which process information on our behalf (e.g. internet service and platform providers, our bankers (Bank Hapoalim and Bank Leumi), our PR consultants and lobbyists (such as Luther Pendragon), our registrars (Link Market Services and Link Asset Services (Jersey) Limited), payment processing providers and those organisations we engage to help us send communications to you) so that they may help us to provide you with the products and services and information you have requested; and 1.6 another organisation to whom we may transfer our agreement with you or if we sell or buy (or negotiate to sell or buy) our business or any of our assets (provided that adequate protections and safeguards are in place).

Schedule 3
Data about suppliers and supplier personnel

What we collect:	We may use your information for the following purposes, based on the following legal grounds:	Recipients:
<ul style="list-style-type: none"> • Contact details such as your name, work addresses, email address, landline/mobile phone or fax numbers. • Employment information such as your position/title, professional specialisms and qualifications. 	<ul style="list-style-type: none"> • If it is necessary for the performance of our contract or for the purposes of entering into a contract: for the purpose of negotiating and entering into contractual agreements with you, in the course of receiving services from you e.g. contacting individuals where we need to do so to provide instructions and discuss work involved. • If it is in our legitimate business interests to do so: for internal record keeping for administration purposes, for the purpose of communications in relation to establishing a supplier relationship, obtaining evidence of identity of our suppliers, communications regarding our service and fees, for insight purposes (e.g. to analyse market trends and demographics, and develop the service which we offer to you or other individuals in the future) and sending information to you about products and services which we think may be of interest to you for marketing purposes. • Compliance with a legal obligation: in order to prevent fraud or money laundering or to comply with any other legal or regulatory requirements. 	<p>How we share information</p> <ol style="list-style-type: none"> 1. Please note that personal information we are holding about you may on the legal grounds set out in this Privacy Policy be shared with and processed by: <ol style="list-style-type: none"> 1.1 our customers, in the course of providing services for and/or performing our contractual obligations to customers; 1.2 regulators (such as the UK Financial Conduct Authority) or other third parties for the purposes of monitoring and/or enforcing our compliance with any legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts; 1.3 credit reference and fraud prevention agencies; 1.4 shareholders of BATM; 1.5 our own professional advisers and auditors for the purpose of seeking professional advice or to meet our audit responsibilities (such as our legal counsel (Fladgate LLP and Lipa Meir & Co), our auditors (Brightman Almagor Zohar & Co) and our financial advisors (Shore Capital)); 1.6 our service providers and agents (including their subcontractors) or third parties which process information on our behalf (e.g. internet service and platform providers, our bankers (Bank Hapoalim and Bank Leumi), our PR consultants (Luther Pendragon), our registrars (Link Market Services and Link Asset Services (Jersey) Limited), payment processing providers and those organisations we engage to help us send communications to you) so that they may help us to provide you with the products and services; and information you have requested; and

<ul style="list-style-type: none"> • Payment information such as bank details and transaction history. 	<ul style="list-style-type: none"> • If it is necessary for the performance of our contract: for the purpose of making or receiving payments in the course of the supplier's services. • If it is in our legitimate business interests to do so: for the purpose of enquiring, requesting or purchasing goods or services, for internal record keeping for administration purposes, for the purpose of retaining evidence of payment transactions and for insight purposes (e.g. to analyse market trends and demographics in relation to our suppliers' fees). • Compliance with a legal obligation: in order to prevent fraud or money laundering or to comply with any other legal or regulatory requirements. 	
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Schedule 4
Data about individuals who apply for employment with us

What we collect	We may use your information for the following purposes, based on the following legal grounds:	Recipients:
<ul style="list-style-type: none"> • Contact details such as names, home and work addresses, landline/mobile phone or fax numbers, email addresses, previous addresses. 	<p>Our legitimate interest in processing such information for contacting individuals where we need to do so and for obtaining/verifying evidence of identity.</p>	<p>How we share information</p> <ol style="list-style-type: none"> 1. Please note that personal information we are holding about you may be shared with and processed by: <ol style="list-style-type: none"> 1.1 recruitment agencies to communicate offer details (if any); 1.2 regulatory and law enforcement bodies, where required of us under UK or Israeli law or regulation; and 1.3 our service providers (such as data storage, typing, administrative support and audit).
<ul style="list-style-type: none"> • Employment related history and qualifications information such as position/title, date of birth, employment history and CV, references from previous employees, professional specialisms, education and qualifications, salary and benefits, disciplinary record. 	<p>Our legitimate interest in processing such information for assessing their suitability for the role, or considering potential packages and offers.</p>	<p>How we share information</p> <ol style="list-style-type: none"> 2. Please note that personal information we are holding about you may be shared with and processed by: <ol style="list-style-type: none"> 2.1 recruitment agencies to communicate offer details (if any); and 2.2 our service providers (such as data storage, typing, administrative support and audit).
<ul style="list-style-type: none"> • Personal information such as professional and personal interests and languages spoken. 	<p>Our legitimate interest in processing such information for assessing their suitability for the role.</p>	
<ul style="list-style-type: none"> • Information contained in or provided to us as part of our recruitment or take on process such as details included in copy personal photographs and residential ID documents we receive. • Visa documentation (right to work in Israel). 	<p>Our legitimate interest in processing such information for obtaining/verifying evidence of identity.</p> <p>Compliance with a legal obligation in order to confirm that the individual is entitled to work in Israel and for the purpose of security and prevention of crime.</p>	<p>How we share information</p> <ol style="list-style-type: none"> 3. Please note that personal information we are holding about you may be shared with and processed by: <ol style="list-style-type: none"> 3.1 UK and Israeli regulatory and law enforcement bodies, where required of us under UK or Israeli law or regulation; and 3.2 our service providers (such as data storage, typing, administrative support and audit).

Schedule 5

Data about directors, staff, consultants, secondees, those on work experience, temporary staff, former directors and staff, next of kin, spouses, beneficiaries

What we collect	We may use your information for the following purposes, based on the following legal grounds:	Recipients
<ul style="list-style-type: none"> • Contact details (work) such as name, work address, landline/mobile phone or fax numbers, email address. • Contact details (personal) and other personal information such as home address, landline/mobile phone number, email address, previous addresses, emergency contact details, date of birth, marital status, next of kin, spouse, beneficiaries' names and contact details. 	<ul style="list-style-type: none"> • Necessary for the performance of our contract in our capacity as your employer. • Necessary to protect the vital interests of the individual concerned for the purposes of security and prevention of crime. • Our legitimate interest in processing such information (work contact details) for contacting individuals where we need to do so in the individual's capacity as employee, director or other member of staff. • Our legitimate interest in processing such information (personal contact details) for the purpose of contacting individuals where we need to do so in the individual's capacity as employee, director/shareholder or other member of staff, in order to keep appropriate employment records, for obtaining/verifying evidence of identity or for contacting next of kin, spouses and beneficiaries if the circumstances require (such as in an emergency). • Our legitimate interest in processing such information in order to oversee the management and functioning of BATM subsidiaries (applicable where you are a director, member of staff or consultant of one of the BATM subsidiaries). • Compliance with a legal obligation to comply with right to work legislation. 	<p>How we share information</p> <ol style="list-style-type: none"> 1. Please note that personal information we are holding about you may be shared with and processed by: <ol style="list-style-type: none"> 1.1 our customers; 1.2 other professional advisers of our customers; 1.3 other parties and/or their professional advisers involved during the course of services provided to our customers; 1.4 regulators or other third parties for the purposes of monitoring and/or enforcing our compliance with any legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts; 1.5 credit reference and fraud prevention agencies; 1.6 other parties and/or their professional advisers involved in a matter where required as part of the conduct of the services; 1.7 our own professional advisers and auditors for the purpose of seeking

“Special categories of information” such as:

- **information about your health**, including any medical condition, health and sickness records such as details of any absences (other than holidays) from work including time on statutory parental leave and sick leave;

To the extent that you are a UK-based employee of BATM or a BATM subsidiary, we will use special categories of personal data in the following ways, and based on the following legal grounds:

- **Pursuant to Schedule 1, Part 2(8) of the UK Data Protection Act 2018**, we will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws. We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits including statutory maternity pay and statutory sick pay.
- We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive or other personal data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

To the extent that you are an employee of BATM or a BATM subsidiary based elsewhere in the European Economic Area, we may process such special categories of personal data pursuant to any local legislation that applies in the country in which you are based.

professional advice or to meet our audit responsibilities (such as our legal counsel (Fladgate LLP and Lipa Meir & Co), our auditors (Brightman Almagor Zohar & Co) and our financial advisors (Shore Capital));

- 1.8 our service providers and agents (including their subcontractors) or third parties which process information on our behalf (e.g. internet service and platform providers, our bankers (Bank Hapoalim and Bank Leumi), our PR consultants (Luther Pendragon), data storage providers, typing service providers, administrative support, third party payroll processors, audit providers;
- 1.9 third party providers of benefits (such as life insurers and pension providers);
- 1.10 another organisation to whom we may transfer our agreement with you or if we sell or buy (or negotiate to sell or buy) our business or any of our assets (provided that adequate protections and safeguard are in place).

2. Please note that **special categories** of information will only be disclosed as follows (and provided you have consented):

- 2.1 **health data** may be provided to medical professionals or third party providers of benefits (such as life insurers).

<ul style="list-style-type: none"> • Employment and performance related information such as position/title, date of birth, employment history and CV, references from previous employees, professional specialisms, education and qualifications, salary and benefits, disciplinary records, performance records, appraisals, performance feedback, interview notes, languages spoken, practising certificate details and caveats, professional indemnity information, working patterns (days worked and non-work days). 	<ul style="list-style-type: none"> • Necessary for the performance of the employment contract in order to keep appropriate employment records and carry out our contractual obligations as employer. • Our legitimate interest in processing such information in order to keep appropriate employment records, for assessing their continued suitability for their role, for planning progression, and for promoting the business publicly. 	
<ul style="list-style-type: none"> • Payment and financial information such as bank details, transaction history, salary and benefits, life insurance, pension related information, tax-related information and social-security related information. 	<ul style="list-style-type: none"> • Necessary for the performance of the employment contract to pay or compensate the individual. • Our legitimate interest in processing such information in order to keep appropriate employment records and to allow the individual to receive pension and other benefits. • Our legitimate interest in processing such information in order to oversee the management and functioning of BATM subsidiaries (applicable where you are a director, member of staff or consultant of one of the BATM subsidiaries). • Consent in order to allow nominated family members or beneficiaries to receive benefits or insurance funds. 	
<ul style="list-style-type: none"> • Information contained in or provided to us as part of our recruitment or take on process such as details included in copy personal photographs and residential ID documents we receive. • Visa documentation (right to work in Israel) 	<ul style="list-style-type: none"> • Our legitimate interest in processing such information for obtaining/verifying evidence of identity. • Compliance with a legal obligation in order to confirm that the individual is entitled to work in Israel and for the purpose of security and prevention of crime. 	

- **Monitoring information** such as images via CCTV, entrance/exit dates/times, movement within the building via security card system.

- **Our legitimate interest** in maintaining a safe environment and in preventing and detecting crime.
- **Necessary to protect the vital interests of the individual concerned:** for security purposes and in order to maintain a safe environment.
- **Compliance with a legal obligation:** in order to prevent fraud or money laundering or to comply with any other legal or regulatory requirements.

Schedule 6
Data about visitors to our office

What we collect:	We may use your information for the following purposes, based on the following legal grounds:	Recipients:
<ul style="list-style-type: none"> • Monitoring information such as images via CCTV, entrance/exit dates/times, movement within the building via security card system. 	<ul style="list-style-type: none"> • If it is in our legitimate business interests to do so: for security purposes and pursuant to our legitimate interest in maintaining a safe environment, for the purpose of confirming attendance/location of the individual, for determining contract performance (in the case of employees and suppliers), and for use where catering is arranged (in the case of dietary preferences). • Necessary to protect the vital interests of the individual concerned: for security purposes and in order to maintain a safe environment. • Compliance with a legal obligation: in order to comply with any other legal or regulatory requirements. 	<p>How we share information</p> <ol style="list-style-type: none"> 1. Please note that personal information we are holding about you may be shared with and processed by: <ol style="list-style-type: none"> 1.1 building management and law enforcement authorities, or other regulators or other third parties for the purposes of monitoring and/or enforcing our compliance with any legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts; and 1.2 the relevant individual's employer or agent.

Schedule 7
Data collected about visitors to our website

What we collect	We may use your information for the following purposes, based on the following legal grounds:	Recipients:
<ul style="list-style-type: none"> • IP addresses 	<p>If it is in our legitimate business interests to do so: for the purposes of monitoring and performing analytics in respect who is visiting our website.</p>	<p>How we share information</p> <ol style="list-style-type: none"> 1. Please note that personal information we are holding about you may be shared with and processed by our IT services provider.
<ul style="list-style-type: none"> • Contact details (such as your name, email address) • Details of any query submitted to us 	<p>If it is in our legitimate business interests to do so: for the purpose of considering and responding to any query you have submitted to us.</p> <p>Consent: where we have requested your consent and you have provided it (e.g. where you have signed up to receive our newsletter)</p>	

Schedule 8
Retention and deletion policy

Unless we are required or permitted by law to hold on to your information for a specific retention period, we may retain your information for the following purposes and periods:

Category of personal data	Period for which personal data will be stored
<ul style="list-style-type: none"> Data about our customers, business contacts, and third parties when we provide services to our customers. 	<p>Contracts and general correspondence (emails, post and other communications) obtained in the course of providing our services:</p> <p>Such information will be stored for 7 years following completion of the services or termination or expiry of the contract with our customer (whichever is later).</p> <p>Contact details for marketing purposes:</p> <p>Contact information relating to customers and contacts will be held for so long as we believe the information to remain accurate and the individual concerned remains a genuine connection of us, or of one of our directors and staff. We have a programme for reviewing our contacts regularly, and removing any information which is considered to be out of date or no longer relevant.</p>
<ul style="list-style-type: none"> Data about our shareholders and/or investors 	<p>Contact details and information (such as size of shareholding):</p> <p>Such information will be stored for 6 months following any shareholder and/or investor ceasing to hold any shares or other interest in BATM.</p>
<ul style="list-style-type: none"> Data about our suppliers and supplier personnel. 	<p>Contracts and general correspondence (emails, post and other communications) obtained in the course of providing your services:</p> <p>Such information will be stored for 7 years following completion of the services or termination or expiry of the relevant contract (whichever is later).</p>
<ul style="list-style-type: none"> Data about individuals who apply for employment with us. 	<p>Personal data obtained from employment applicants will be deleted after 1 year.</p>
<ul style="list-style-type: none"> Data about our directors and staff, former directors and staff and other individuals who spend time with us (such as consultants and secondees). 	<p>Human resources (HR) records will be destroyed 7 years following employment.</p>
<ul style="list-style-type: none"> CCTV. 	<p>CCTV information is destroyed after 60 days.</p>

- **Data collected about visitors to our website**

IP addresses are stored for 60 days.

Contact and general information submitted to us via our website

Such information will be retained for as long as the individual concerned remains a genuine connection of us, or one of our directors and staff.

Contact details for marketing purposes (such as email addresses)

If this information has been provided in order to receive a newsletter, such information will be held until the individual notifies us that it no longer wishes to receive marketing emails from us.

We have a programme for reviewing our contacts regularly, and removing any information which is considered to be out of date or no longer relevant.