

Privacy Policy

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At BTI Global Communications Ltd (BTI UK), we recognise that privacy is important. This Privacy Policy applies to all of the products, services and websites offered by BTI UK or its subsidiaries or affiliated companies including but not restricted to Bayan Telecommunications Inc (Bayan).

BTI UK adheres to the [Data Protection Act 1988](#) as published by the Government of the UK and is registered with the Information Commissioners Office of the UK as a company that collects and stores certain data about its potential customers, customers and employees.

If you have any questions about this Privacy Policy, please feel free to [contact us](#) through our website or write to us at

BTI Global Communications Ltd
PO BOX 379
SOUTHAMPTON
SO31 9GE

Information that we collect and how we use it

In order to provide our full range of services, we may collect the following types of information:

- **Information that you provide** – When you sign up for a Family Ties or other BTI UK service or promotion that requires registration, we ask you for personal information (such as your name, address and email address). For certain services, we also request credit card or other payment account information, which we do not store but may be stored by our online payment service providers such as Google Checkout or PayPal. We may combine the information that you submit under your account with information from other BTI UK services or third parties, in order to provide you with a better experience and to improve the quality of our services. For certain services, we may give you the opportunity to opt out of combining such information.
- **Cookies** – When you visit our web site, we may send one or more cookies – a small file containing a string of characters – to your computer or other device that uniquely identifies your browser. We use cookies to improve the quality of our service, including the tracking of user trends, such as how people arrive at our web site.
- **Log information** – When you access the BTI UK web site, our servers may automatically record information that your browser sends. These server logs may include information such as your web request, Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser.
- **User communications** – When you send emails or other communications to BTI UK, we may retain those communications in order to process your enquiries, respond to your requests and improve our services.

- **Affiliated BTI UK services on other sites** – We may offer some of our services on or through other websites. Personal information that you provide to those sites may be sent to BTI UK in order to deliver the service. We process such information under this Privacy Policy. The affiliated sites through which our services are offered may have different privacy practices and we encourage you to read their privacy policies.
- **Links** – BTI UK may present links in a format that enables us to keep track of whether these links have been followed. We use this information to improve the quality of our search technology.
- **Other sites** – This Privacy Policy applies to BTI UK services only. We do not exercise control over the sites displayed as the result of searches, sites that include BTI UK products or services or links from within our various services. These other sites may place their own cookies or other files on your computer, collect data or solicit personal information from you.

BTI UK only processes personal information for the purposes described in this Privacy Policy. In addition to the above, such purposes include:

- Providing our services, including the display of customised content and advertising;
- Auditing, research and analysis in order to maintain, protect and improve our services;
- Protecting the rights or property of BTI UK or our users; and
- Developing new services.

BTI UK processes personal information on our servers in the United Kingdom and in other countries. In some cases, we process personal information on a server outside your own country. We may process personal information to provide our own services. In some cases, we may process personal information on behalf of and according to the instructions of a third party, such as our parent company, Bayan Telecommunications Inc.

Choices for personal information

When you sign up for a particular service that requires registration, we ask you to provide personal information. If we use this information in a manner different from the purpose for which it was collected, then we will ask for your consent prior to such use.

If we propose to use personal information for any purposes other than those described in this Privacy Policy and/or in the specific service privacy notices, we will offer you an effective way to opt out of the use of personal information for those other purposes. We will not collect or use sensitive information for purposes other than those described in this Privacy Policy, unless we have obtained your prior consent.

Information sharing

BTI UK only shares personal information with other companies or individuals outside BTI UK in the following limited circumstances:

- We have your consent. We require opt-in consent for the sharing of any sensitive personal information.
- We provide such information to our subsidiaries, affiliated companies or other trusted businesses or persons for the purpose of processing personal information on our behalf. We require that these parties agree to process such information based on our

instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.

- We have a good-faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce applicable Terms of Service, including investigation of potential violations thereof, (c) detect, prevent or otherwise address fraud, security or technical issues, or (d) protect against harm to the rights, property or safety of BTI UK, its users or the public, as required or permitted by law.

If BTI UK becomes involved in a merger, acquisition or any form of sale of some or all of its assets, we will ensure the confidentiality of any personal information involved in such transactions and provide notice before personal information is transferred and becomes subject to a different privacy policy.

Please contact us at the address below for any additional questions about the management or use of personal data.

Information security

We take appropriate security measures to protect against unauthorised access to or unauthorised alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, as well as physical security measures to guard against unauthorised access to systems where we store personal data.

We restrict access to personal information to BTI UK employees, contractors and agents who need to know that information in order to operate, develop or improve our services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

Data integrity

BTI UK processes personal information only for the purposes for which it was collected and in accordance with this Privacy Policy or any applicable service-specific privacy notice. We review our data collection, storage and processing practices to ensure that we only collect, store and process the personal information needed to provide or improve our services or as otherwise permitted under this Policy. We take reasonable steps to ensure that the personal information that we process is accurate, complete and current, but we depend on our users to update or correct their personal information whenever necessary.

Enforcement

BTI UK regularly reviews its compliance with this Privacy Policy. Please feel free to direct any questions or concerns regarding this Privacy Policy or Google's treatment of personal information by [contacting us](#) through this website or by writing to us at

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When we receive formal written complaints at this address, it is BTI UK's policy to contact the complaining user regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between BTI UK and an individual.

Changes to this Privacy Policy

Please note that this Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent and we expect that the majority of such changes will be minor. Regardless, we will post any Privacy Policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes). Each version of this Privacy Policy will be identified at the top of the page by its effective date, and we will also keep prior versions of this Privacy Policy in an archive for your review.

If you have any additional questions or concerns about this Privacy Policy, please feel free to contact us at any time through this website or at

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