



# BT shareplan and shareholder privacy notice



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## Welcome

## Why do we have a privacy notice?

**We've updated our privacy notice to reflect the changes in data protection laws.**

We have a legal obligation to let you know what personal information we collect about you, what we use it for and on what basis. We always need a good reason and we also have to explain to you your rights in relation to that information. You have the right to know what information we hold about you and to have a copy of it, and you can ask us to change or sometimes delete it.

The reasons we collect information are set out in this privacy notice, but we're not telling you all this just because we have to. We believe that it's very important for our employees and shareholders to trust us with that information. We want you to be confident that we will keep it secure and use it both lawfully and ethically, respecting your privacy.

Whatever we do with your information, we need a legal basis for doing it. We generally rely on one of three grounds (reasons) for our business processing. Firstly, if you have bought BT Group plc shares or participate in a BT employee share plan, we're entitled to process your information so we can complete your transaction and manage your account, such as including you on our share register, sending you information about your BT shareholdings, and making dividend payments.

Secondly, if we want to collect and use your information for other purposes, we may need to ask for your consent (permission) and, if we do, that permission must always be indicated by a positive action from you (such as ticking a box) and be an informed decision. You're free to withdraw your permission at any time.

But we don't always need permission. In some cases, having assessed whether our use would be fair and not override your right to privacy, we may come to the view that it falls within the third ground – our 'legitimate interests' to use the information in a particular way without your permission. For example, we share the information you provide to us with Equiniti Limited, our share registrar, so they can manage your shareholding on our behalf.

This is all set out in detail in this notice, which focuses more on those items that we think are likely to be of most interest to you. As well as covering processing for business purposes, we give you information on circumstances in which we may have to, or can choose to, share your information.

## When does this privacy notice apply?

Please read this notice carefully as it applies to you as an acquirer of BT Group plc shares, or a participant in a BT employee share plan, and it applies to our use of your personal information.

This privacy notice doesn't apply to how other organisations use your personal information such as Equiniti Financial Services Limited (who are Controllers for our EasyShare account data) and other organisations involved in running our share plans (such as the bank holding your savings as part of a saveshare and Equiniti Plan Trustees Limited holding directshare shares), which also need to use your personal information.

If you need to give us personal information about someone else in relation to your shareholding with us, this privacy notice will also apply. And if we need the permission of the other person to use that information, we'll ask you to check they are OK with this.

We review our privacy notice regularly. It was last updated on 14 May 2018. And we'll tell you if we change the policies, as set out here.

### What's not included?

This notice doesn't apply to information about our employees or customers. If you are a BT employee and have a share plan, it relates to your share plan and how we manage your information as a share plan participant, but not as an employee.

### Keeping your personal information up to date

It's important to us that the information we hold about you remains accurate and up to date at all times, but we need your help in doing this. Please ensure that you review the information held about you regularly and let us know as soon as anything needs updating or correcting.

# What personal information we collect and how

The personal information we collect about you is needed to administer your BT share plan (employee and executive), BT shareholding and maintain our share register. We explain the different ways we use your personal information below.

If you don't give us the correct information or ask us to delete it, we might not be able to help you with the purchase of shares or signing up to a share plan.

## 1. BT employees

### The personal information we collect

As your employer, we have access to some of your personal information. We may collect and use the following personal information about you to offer and manage your share plan (employee or executive) participation:

Your contact details and other information to confirm your identity and your communications with us. This includes your name, gender, address, phone number, date of birth, nationality, email address, payroll reference, National Insurance Number or other tax identification number such as social security number and your salary bank account, payroll details such as salary, tax status and bonus payments, local employer's PAYE reference, your pay site code, passwords and credentials (such as the account number we assign).

Information about the value of the plan, savings information where there is a linked savings arrangement, the number of plan shares or shares under option.

Information relating your status of employment with BT to add you to a BT Share Dealing Code List, to manage your account, for example when you leave BT or if you change roles and have a different entitlement.

We collect this information when you provide it to us, we create it ourselves, or collect it from other organisations.

### How we collect your personal information

Information you provide to us:

By filling in forms on the BT intranet if you are an employee;

Through using Interactive Voice Response, Text or Touchtone services;

By contacting us, either directly or via your local share plan co-ordinator, in writing, by phone, email, live-chat or otherwise;

Through application forms and legal documentation;

Through promotions or surveys; and

When you report any problems or complaints.

Information we collect about you:

As part of our identity and financial crime checking procedures with credit reference agencies, fraud detection agencies, registration or stockbroking industry exchanges, and in accordance with the Money Laundering Regulations (please see below for more details).

**What we use your personal information for**

The **personal information** we collect depends on the share plan you have. We've explained the different ways we use your personal information below.

## a) To manage your holdings, by:

- including you on our share plan register;
- making dividend payments;
- completing transactions that you instruct us to undertake;
- checking individual share entitlements and/or savings limits are not exceeded;
- retaining records of your instructions and keeping your plan account up-to-date;
- sending you information about your share plan, changes to our services, actions impacting your share plan, corporate actions, voting instructions and our shareholder meetings;
- giving information to Equiniti Limited, our share registrar, so they can manage your shareholding on our behalf;
- providing you with transaction records/confirmation notices and statements as required by financial regulations; and
- supporting you more if you are a vulnerable customer.

We use this information to carry out our obligations under the terms of agreement we have with you.

If you tell us you have a disability or otherwise need support, we'll note that you are a vulnerable customer, but only if you give your permission or if we have to for legal or regulatory reasons. For example, if you told us about a disability we need to be aware of when we deliver our services to you, we have to record that information so we don't repeatedly ask you about it. We will also record the details of a **Power of Attorney** or court protection order we have been asked to log against your account.

## b) Because it is in our legitimate interests as a business to use your information

We'll use your **personal information** if we consider it is in our legitimate business interests so that we can operate as an efficient and effective business in administering our share plans. We use your information to:

- identify, and let you know about, plans that you would be eligible for or may interest you;
- share within the BT Group for administrative purposes;
- share with Equiniti Limited\*, our share registrar, and other Equiniti Group entities such as Equiniti Financial Services Limited, so they can manage your holding on our behalf and deliver products, services (including online portals) and maturity services;
- make efforts to trace you if we lose contact with you, for example, to reunite you with your assets;
- create aggregated and anonymised information for further use;
- improve our service including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- share with our insurers and insurance brokers where required for underwriting our risks and as part of ongoing risk assessments;
- run credit and fraud prevention checks – see below for more information;
- collect debt, bring or defend claims – see below for more information; and
- prevent and detect crime, and secure and protect our network – see below for more information.

\* We ask you to tell Equiniti Limited about any changes to the information they hold to make sure our records are accurate and up-to-date. You can find contact details at: <https://www.btplc.com/Sharesandperformance/Contactus/Individualshareholders/index.htm>

In addition, the Equiniti employee share plan helpline details are 0800 313 4458 (+44 121 415 0072 from outside the UK) or Textel/Minicom Service 0800 169 6907.

## 2. Individual shareholders

**The personal information we collect**

Anyone can buy shares in BT on the public stock exchange. We may collect and use the following personal information about you to manage your shareholding:

Your contact details and other information to confirm your identity and your communications with us. This includes your name, gender, address, phone number, date of birth, email address.

Your bank/building society details to pay dividends direct.

We collect this information when you provide it to us or we create it ourselves or collect it from other organisations.

**How we collect your personal information**

## Information you provide to us:

By filling in forms on the Equiniti website;

Through using Interactive Voice Response, Text or Touchtone services;

By contacting us, either directly or via your local share plan co-ordinator, in writing, by phone, email, live-chat or otherwise;

Through application forms and legal documentation;

Through promotions or surveys; and

When you report any problems or complaints.

## Information we collect about you:

As part of our identity and financial crime checking procedures with credit reference agencies, fraud detection agencies, registration or stockbroking industry exchanges, and in accordance with the Money Laundering Regulations (please see below for more details).

**What we use your personal information for**

The **personal information** we collect depends on the shareholding you have. We've explained the different ways we use your personal information below.

## a) To manage your shareholdings

If you have bought BT Group plc shares, we are entitled to process your information so that we can:

- include you on our share register;
- make dividend payments;
- complete transactions that you instruct us to undertake;
- retain records of your instructions and keeping your shareholding account up-to-date;
- send you information about your BT shareholdings, corporate actions, changes to our services, voting instructions and our shareholder meetings;
- give information to Equiniti Limited, our share registrar, so they can manage your shareholding on our behalf;
- provide you with transaction records/confirmation notices and statements as required by financial regulations; and
- support you more if you are a vulnerable customer.

We use this information to carry out our obligations to you as a shareholder.

If you tell us you have a disability or otherwise need support, we'll note that you are a vulnerable customer, but only if you give your permission or if we have to for legal or regulatory reasons. For example, if you told us about a disability we need to be aware of when we deliver our services to you, we have to record that information so we don't repeatedly ask you about it. We will also record the details of a **Power of Attorney** or court protection order we have been asked to log against your account.

b) Because it is in our legitimate interests as a business to use your information

We'll use your personal information if we consider it is in our legitimate business interests so that we can operate as an efficient and effective business in administering our shares. We use your information to:

- identify, and let you know about, plans that you would be eligible for or may interest you;
- share within the BT Group for administrative purposes;
- share with Equiniti Limited\*, our share registrar, and other Equiniti Group entities such as Equiniti Financial Services Limited, so they can manage your shareholding on our behalf and deliver products and services (including online portals);
- make efforts to trace you if we lose contact with you, for example, to reunite you with your assets;
- create aggregated and anonymised information for further use;
- to improve our service including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- share with our insurers and insurance brokers where required for underwriting our risks and as part of ongoing risk assessments;
- to run credit and fraud prevention checks – see below for more information;
- to collect debt, bring or defend claims – see below for more information; and
- to prevent and detect crime, and secure and protect our network – see below for more information.

\* We ask you to tell Equiniti Limited about any changes to the information they hold to make sure our records are accurate and up-to-date. You can find contact details at: <https://www.btplc.com/Sharesandperformance/Contactus/Individualshareholders/index.htm>

c) To run credit and fraud prevention checks

Before we provide you with a product or service, we may use personal information you have given us together with information we have collected from credit reference agencies (such as Experian or Equifax), or fraud prevention agencies (such as Cifas). Equiniti Limited do this on our behalf. We use this information to manage our credit risk, and prevent and detect fraud and money laundering. We'll also use these organisations to confirm your identity. When they get a search from us, a 'footprint' goes on your file which other organisations might see. We might also share the information with other organisations. We do this because it's in our, and the organisations', legitimate interests to prevent fraud and money laundering, and to check identities, to protect our business and to keep to laws that apply to us.

Details of the personal information that will be used include your name, address, date of birth, contact details, financial information, employment details and device identifiers, including IP address and vehicle details.

If you don't buy BT shares, we'll still keep the result of our credits checks about you if we have a legal obligation and it's in our legitimate interests to help prevent or detect fraud. Fraud prevention agencies can hold your personal information for different periods of time, and if you are considered to pose a fraud or money laundering risk, your information can be held by us and the organisations we share it with for up to six years.

If you give us false or inaccurate information which we identify as fraudulent, we'll pass that on to fraud prevention agencies. We might also share it with law enforcement agencies, as may the agencies we have shared the information with.

If you tell us you're associated with someone else financially (for example, by marriage or civil partnership), we'll link your records together. So you must make sure you have their agreement to share information about them. The agencies we share the information with also link your records together and these links will stay on your and their files – unless you or your partner successfully asks the agency to break that link.

If we, a credit reference or fraud prevention agency, decide that you are a credit, fraud or money laundering risk, we may refuse to provide the services or financing you have asked for, or we may stop providing existing services to you.

The credit reference and fraud prevention agencies will keep a record of any fraud or money laundering risk and this may result in other organisations refusing to provide services, financing or employment to you. If you have any questions about this, please contact us using the details below.

We send credit reference and fraud prevention agencies information about applications, and they keep that information. We might also give them details of your accounts and bills, including how you manage them. This includes telling them about your account balances, what you pay us and if you miss a payment (going back in the past, too). So if you don't pay your bills on time, credit reference agencies will record that. They, or a fraud prevention agency, might tell others doing similar checks – including organisations trying to trace you or recover money you owe them.

There are different credit reference agencies in the UK (for example, Callcredit, Equifax and Experian). Each one might hold different information about you. If you want to find out what information they have on you, they may charge you a small fee.

Whenever credit reference and fraud prevention agencies transfer your personal information outside of the European Economic Area, they place contractual responsibilities on the organisation receiving it to protect your information to the standard required in the European Economic Area. They may also make the organisation receiving the information subscribe to 'international frameworks' aimed at sharing information securely.

Here are links to the information notice for each of the three main Credit Reference Agencies.

[Callcredit – www.callcredit.co.uk](http://www.callcredit.co.uk)

[Equifax – www.equifax.co.uk](http://www.equifax.co.uk)

[Experian – www.experian.co.uk](http://www.experian.co.uk)

## 3. BT employees and individual shareholders

### The following sections apply whether you are a share plan member or an individual shareholder

#### To collect debt

If you're an individual shareholder, we might ask a debt recovery agency to collect monies owed to us. We'll give them information about you (such as your contact details) and your account (the amount of the debt) and may choose to sell the debt to another organisation to allow us to receive the amount due.

If you are a BT employee, we will collect payment through the payroll function. It is unlikely that we will ever have to collect debt through a debt recovery agency.

#### To prevent and detect crime

We'll use your personal information to help prevent and detect crime and fraud. We'll also use it to prevent and detect criminal attacks on our network or against your equipment. We monitor traffic over our network, trace nuisance or malicious calls, and track malware and cyber attacks.

To do that we use the following information, but only where strictly necessary.

- Your contact details and other information to confirm your identity and communications with us. This includes your name, gender, address, phone number, date of birth, email address, passwords and credentials (for example, security questions). We do not store the original copy of your password. Instead we keep it in a form that allows us to authenticate you but does not allow us to work out what your original password is.
- Your payment and financial information.
- Information from credit reference and fraud prevention agencies.
- Details of your share plans, or shareholdings you have with us.
- CCTV footage in our buildings and at meetings.

We use this personal information because we have a legitimate interest in protecting our network and business from attacks and to prevent and detect crime and fraud. We also share it with other organisations (such as other communications providers and banks) who have the same legitimate interests. Doing this helps make sure our network works properly and helps protect you from attacks.

If you call the emergency services, we'll give them information about you and where you are so they can help. We do this because it is necessary to protect you, or another person, and because it is in our interests to help the emergency services in providing help to you.

### To meet our legal and regulatory obligations

We might have to share personal information about you to meet our legal and regulatory obligations.

#### To account for tax, duties and other legal and regulatory obligations

Under legislation, such as the UK Social Security legislation, we may have to share personal information to submit returns to the relevant regulatory authorities and deduct tax and duties (such as income tax). This includes disclosing information to Her Majesty's Revenue & Customs (HMRC).

We may also have to share your personal information with regulators and supervisory authorities, for example, domestic or foreign tax authorities, the Department for Work and Pensions (DWP), Her Majesty's Courts and Tribunals Service (the courts), the Financial Services Authority, the London Stock Exchange plc or the operator of any market on which you may hold investments, as part of our legal obligations in providing the products/services.

#### To law enforcement agencies

Under investigatory powers legislation, we might have to share personal information about you with government and law enforcement agencies, such as the police, to help detect and stop crime, prosecute offenders and protect national security. They might ask for the following details:

- Your contact details. This includes your name, gender, address, phone number, date of birth, email address, passwords and credentials (such as your security questions and answers) needed to confirm your identity and your communications with us.
- Your communications with us, such as calls, emails and webchats.
- Your payment and financial information.
- Details of the share plans and products and services you've bought.

The balance between privacy and investigatory powers is challenging. We share your personal information when the law says we have to, but we have strong oversight of what we do and get expert advice to make sure we're doing the right thing to protect your right to privacy. You can read more about our approach to investigatory powers in our report on Privacy and free expression in UK communications. And you can see the terms of reference for our oversight body here.

We'll also share personal information about you where we have to legally share it with another person. That might be when a law says we have to share that information or because of a court order.

In limited circumstances, we may also share your information with other public authorities, even if we do not have to. However, we would need to be satisfied that a request for information is lawful and proportionate (in other words, appropriate to the request). And we would need appropriate assurances about security and how the information is used and how long it is kept.

# Protecting your information and how long we keep it

### How do we protect your personal information?

We have strict security measures to protect your personal information. We check your identity when you get in touch with us, and we follow our security procedures and apply suitable technical measures, such as encryption, to protect your information.

Where you have been given (or where you have chosen) a password or unique identifier (PIN) which enables you to access your plan details, you are responsible for keeping this password/PIN confidential, along with any username. We will never ask for your full password or PIN, and you must not divulge your full password to us or anyone else. We recommend that any password or PIN you set is not easily guessable, and changed frequently (at least once a month).

Because we cannot guarantee the confidentiality of personal information sent on the internet you should never send your login details via email.

If you ever receive a communication from us by post, email or by phone that you are concerned may not be genuine, please contact us using the contact details below.

You must immediately inform us if you become aware, or suspect, that someone else has knowledge of your account details.

If you have any concerns about the security of your own personal computers and mobile devices, we suggest you read the advice of Get Safe Online, which can be accessed at [www.getsafeonline.org](http://www.getsafeonline.org)

### How long do we keep your personal information?

We'll keep personal information for the duration of the share plan and for a period of up to seven years following the closure of the plan, for the reasons noted below:

- To respond to enquiries and complaints;
- To demonstrate that your instructions were carried out properly; and
- To maintain records to meet rules and regulatory requirements that are applicable to the administration of the plan.

We keep personal information for eight years after you cease being a BT shareholder to comply with obligations to the HMRC.

In other cases, we'll store personal information for the periods needed for the purposes for which the information was collected or for which it is to be further processed. And sometimes we'll keep it for longer if we need to by law. Otherwise we delete it.

## Sharing your information

If you are a BT employee, we may share your personal information with other companies within the **BT Group**. We have a group-wide arrangement, known as **binding corporate rules**, to make sure your personal information is protected, no matter which company in the BT Group holds that information.

We also use other service providers to process personal information on our behalf. Examples include:

- Equiniti Limited (Equiniti) and other Equiniti Group entities such as Equiniti Financial Services Limited and Equiniti India, who help us administer the plan records and deliver products, services and maturity services;
- Banks and other payment service providers to process your entitlements, payments and manage any savings;
- Printers in order to supply you with documentation and statements;
- Stockbrokers and market makers who execute transactions we make on your behalf;
- Service suppliers to facilitate email, IT and administration services;
- Our professional advisors, for example, our lawyers and technology consultants, when they need it to provide advice to us;
- Third party providers such as Trustees or Nominees, when either we or you have requested their services, e.g. to deliver or manage plan shares;
- Fraud detection agencies as part of our identification procedures, such as Experian;
- Our trusted market research suppliers agencies to see how we can improve the service we provide to you. We may do this ourselves or appoint an agency to do this on our behalf; and
- Your Official Receiver or appointed insolvency practitioner if we receive notice of your insolvency, bankruptcy or insolvency proceedings/arrangement.

Where we use another organisation, we still control your personal information. And we have strict controls in place to make sure it's properly protected.

If there's a change (or expected change) in who owns us or any of our assets, we might share personal information to the new (or prospective) owner. If we do, they'll have to keep it confidential.

Finally, the section above describes the situations in which your personal information is shared with other organisations, government bodies and law enforcement agencies. When we share your information with other organisations we'll make sure it's protected, as far as is reasonably possible.

### The countries we share personal information with

If we need to transfer your personal information to another organisation for processing in countries that aren't listed as 'adequate' by the European Commission, we'll only do so if we have **model contracts** or other appropriate safeguards (protection) in place.

**BT Group** is a large multinational organisation. Our **binding corporate rules** reflect how we operate. They include a list of countries (below) which are structured to allow us to transfer personal information to the countries where we have a presence. For us, after the UK and wider EU, India and the Philippines are where most of our processing of personal information takes place. Your personal information is used for customer or IT support or operations purposes in these countries. While our binding corporate rules allow us to transfer personal information to these countries, the information won't always include your personal information in every case.

Algeria, Argentina, Australia, Bahrain, Bangladesh, Barbados, Bermuda, Bolivia, Bosnia and Herzegovina, Botswana, Brazil, Canada, China, Colombia, Costa Rica, Cote d'Ivoire, Dominican Republic, Ecuador, Egypt, El Salvador, Ghana, Gibraltar, Guatemala, Honduras, Hong Kong, India, Indonesia, Isle of Man, Israel, Jamaica, Japan, Jersey, Jordan, Kazakhstan, Kenya, Republic of Korea, Lebanon, Macedonia, Malawi, Malaysia, Mauritius, Mexico, Moldova, Montenegro, Morocco, Mozambique, Namibia, Nicaragua, Nigeria, Norway, Oman, Pakistan, Panama, Paraguay, Peru, Philippines, Puerto Rico, Qatar, Russian Federation, Serbia, Singapore, South Africa, Sri Lanka, Switzerland, Taiwan, Tanzania, Thailand, Trinidad and Tobago, Tunisia, Turkey, Uganda, Ukraine, United Arab Emirates, United States, Uruguay, Venezuela, Vietnam, British Virgin Islands, Zambia and Zimbabwe.

For more details, or if you'd like a copy of our **binding corporate rules** or other information about a specific transfer of your personal information, get in touch with us here. The fraud prevention section above provides details on transfers fraud prevention agencies may carry out.

## Accessing and updating how we use your information\*

You can access and update the information we hold about you by emailing us at [cpo@bt.com](mailto:cpo@bt.com). Once we've looked at your request, we'll let you know when you can expect to hear from us.

We'll always try to help you with your request but we can refuse if we believe doing so would have a negative effect on others or the law prevents us. And even though we have to complete your request free of charge, we are allowed to reject requests if:

- they're repetitive;
- you don't have the right to ask for the information; or
- the requests made are excessive.

If that's the case, we'll explain why we believe we don't have to fulfil the request.

### Want a copy of the information we hold about you?

If you want a copy of your **share or share plan information**, log in to your account or call the helplines detailed below and we'll send it to you. (You must be the account holder to ask for this information.) If you want to see what **contact information** we hold about you, you can also log in to your account. It's quick and simple to access it this way.

You can also ask us for a copy of the information we hold about you by emailing us at [cpo@bt.com](mailto:cpo@bt.com) or writing to us at:

PO Box 2681  
BT Centre  
81 Newgate Street  
London EC1A 7AJ

Please mark it for the attention of the DPO office.

It will normally take us up to one month to get back to you but could take longer (up to a further two months) if it's a complicated request or we get a lot of requests at once.

We'll reply electronically unless you ask us to send the information by post.

### Concerned about what we're doing with your personal information?

You can ask us to **correct, complete, delete** or **stop using** any personal information we hold about you by emailing us at [cpo@bt.com](mailto:cpo@bt.com) or writing to us at:

PO Box 2681  
BT Centre  
81 Newgate Street  
London EC1A 7AJ

Please mark it for the attention of the DPO office.

In some cases, we might decide to keep information, even if you ask us not to. This could be for legal or regulatory reasons, so that we can keep providing our products and services, or for another legitimate reason. For example, we keep certain payment information to show we have paid your dividend correctly. But we'll always tell you why we keep the information.

We aim to provide our products and services in a way that protects information and respects your request. Because of this, when you delete or change (or ask us to delete or change) your information from our systems, we might not do so straight away from our back-up systems or copies on our active servers. And we may need to keep some information to fulfil your request (for example, keeping your email address to make sure it's not on our marketing list).

Where we can, we'll confirm any changes. For example, we'll check a change of address against the Postal Address File, or we might ask you to confirm it.

If we've asked for your permission to provide a service, you can withdraw that permission at any time. It'll take us up to 30 days to do that. And it only applies to how we use your personal information in the future, not what we've done in the past (for example, if we've run a credit check at the start of your contract).

\* We ask you to tell Equiniti Limited about any changes to the information they hold to make sure our records are accurate and up-to-date. You can find contact details at: <https://www.btplc.com/Sharesandperformance/Contactus/Individualshareholders/index.htm>

In addition, the Equiniti employee share plan helpline details are 0800 313 4458 (+44 121 415 0072 from outside the UK) or Textel/Minicom Service 0800 169 6907.

## Other useful information

### Got a question about how we use your information?

You can get in touch with our Data Protection Officer by email [cpo@bt.com](mailto:cpo@bt.com) or write to the address below and mark it for their attention.

If you'd like any more details, or you have comments or questions about our privacy notice, write to us at:

PO Box 2681  
BT Centre  
81 Newgate Street  
London  
EC1A 7AJ.

If you want to make a complaint on how we have handled your personal information, please contact our Data Protection Officer who will investigate the matter and report back to you. If you are still not satisfied after our response or believe we are not using your personal information in line with the law, you also have the right to complain to the data protection regulator in the country where you live or work. For the UK, that's the Information Commissioner – <https://ico.org.uk/>

### Vulnerable adults

We are committed to the privacy protection of vulnerable adults. If we are notified that you are a vulnerable adult we will liaise with your authorised representative, once we are in receipt of the appropriate permissions.

### Links to other websites

The websites used for administering the plan may contain links to other websites run by other organisations. When you are on another website, we encourage you to read their privacy statement. We cannot be responsible for the privacy policies and practices of other sites.

### Social media, blogs, reviews, and similar services

Any social media posts or comments you make to us or the delivery of your plan (e.g. through a Facebook page) will be shared under the terms of the relevant social media platform (e.g. Facebook or Twitter) on which they are made and could be made public by that platform. These platforms are controlled by other organisations, and so we are not responsible for this sharing. You should review the terms and conditions and privacy policies of the social media platforms you use to ensure you understand how they will use your information, what information relating to you they will place in the public domain and how you can stop them from doing so if you are unhappy about it.

Any blog, review or other posts or comments you make about us, our products and services on any of our blogs, reviews or user community services will be shared with all other members of that service and the public at large.

You are responsible for ensuring that any comments you make comply with any relevant policy on acceptable use of those services.

### Changes to this privacy notice

We review our use of your personal data regularly. In doing so, we may change what personal data we collect, how we keep it and/or what we do with it. As a result, we may change this privacy notice from time to time to keep it relevant and up-to-date.

We will endeavour to alert you to these changes so that you can check you are happy with them before proceeding any further. Please look out for notices from us alerting you to these changes, via websites or other timely communications. If you see such an alert, please take a moment to ensure that you're happy with any changes. However, we will also tell you of the changes where required by law to do so.

If you require copies of previous versions of this privacy notice, please contact BT's Data Protection Officer by email at [cpo@bt.com](mailto:cpo@bt.com) or by post to the address below.

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## Glossary

We have included a description of how the technical terms we use are generally interpreted.

<b>Aggregated data</b>	means grouped information, for example the total number of share transactions made in a year.
<b>Anonymised data</b>	means data which has had all personally identifiable information removed.
<b>BT Group plc</b>	'we', 'us' and 'our' means BT Group plc, as Controller. As the 'Controller' of your shareholding records, or your share plan records, we are responsible for deciding how and why we collect and use your personal information.
<b>BT Group companies</b>	means British Telecommunications plc, EE Ltd, Plusnet plc, Openreach Ltd, BT Communications Ireland Ltd, BT Business Direct Ltd, BT Cables Ltd, Tikit Ltd, BT Fleet Ltd, Pelipod Ltd and BT Law Ltd and the areas that make up BT: Consumer, EE, Business and Public Sector, Global Services, Wholesale and Ventures, Technology, Service and Operations, Group Functions, BT Wifi, BT Shop and MyDonate.
<b>Binding corporate rules</b>	are designed to allow multinational companies to transfer personal information from the European Economic Area (EEA) to their affiliates outside of the EEA and to keep to data protection legislation.
<b>Encryption</b>	means scrambling information into an unreadable form that can only be translated back using a special key.
<b>Individual shareholder</b>	means an individual who has acquired shares in BT.
<b>IP address</b>	is a unique string of numbers that identifies each device using the internet or a local network.
<b>Model contracts</b>	are standard contractual clauses set by the European Commission. They offer enough protection of people's privacy, fundamental rights and freedoms when their personal information is moved from within the EEA to outside of it. The contracts keep to data protection legislation.
<b>Personal information</b>	means information that identifies you as an individual, or is capable of doing so.
<b>Power of attorney</b>	refers to the option to choose a trusted friend or relative (or more than one if you want) to act on your behalf. The person you appoint, called an 'attorney', can then use your money to pay bills, sell assets on your behalf and make gifts. In the UK an 'attorney' must be registered with the Office of the Public Guardian to be valid.
<b>Regulatory obligations</b>	means our obligations to regulators such as Ofcom and the Information Commissioner's Office.



**British Telecommunications plc**

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