

# Privacy Policy

The Reading Agency is committed to safeguarding your personal information. We are committed to protecting your personal information when you are using our products and services.

Whenever you provide such information, we are obliged to and will use your information in line with all applicable laws concerning the protection of personal information, including the Data Protection Act 2018 (these laws are referred to collectively in this Privacy Policy as the "data protection laws").

This Privacy Policy relates to our use of any personal information we collect from you via the following:

- any of The Reading Agency's websites that link to this Privacy Policy
- social media or official Reading Agency content on other websites
- registration on our Passport
- newsletter signup
- product orders through our shop
- voluntary completion of evaluation or surveys
- providing feedback and participating in competitions
- book reviews submitted via our websites

## 1. Who's in control?

- 1.1 It is important that you understand who is responsible for keeping your data safe. We are the "controller" of all personal data collected and used for the purposes of providing The Reading Agency's products and services and for any other purposes set out in this Privacy Policy. This means that we are responsible for deciding how and why your data is used and for ensuring that your data is handled legally and safely.
- 1.2 We have appointed a Data Protection Officer (DPO) who has ultimate responsibility within The Reading Agency for making sure your data is treated in accordance with this Privacy Policy and the law. Our DPO can be contacted by emailing [dataprivacy@readingagency.org.uk](mailto:dataprivacy@readingagency.org.uk).

## 2. What data do we collect and where from?

- 2.1 When you participate in, access or sign up to any of our services, activities or online content, such as newsletters and databases, or create an account, we will receive personal information about you. This can consist of information such as your name, email address, postal address, telephone or mobile number, gender or date of birth.
- 2.2 If you are the parent or guardian of a child under 13, you will be required to hold a Reading Agency Passport account, so you can give consent for your child to access some of our services. We will use your contact details to communicate with you about your child's account or use of services.
- 2.3 We collect some data directly from you when you create an account on The Reading Agency website (your "Account Data"). This data includes the following:
  - 2.3.1 your full name;
  - 2.3.2 your email address;
  - 2.3.3 the password you set up to access your account;
  - 2.3.4 your date of birth;

- 2.3.5 your gender (if you choose to provide it);
  - 2.3.6 your ethnicity (if you choose to provide it);
  - 2.3.7 your postcode (if you choose to provide them); and
  - 2.3.8 your direct marketing preferences.
- 2.4 We call information which identifies you or which can be linked to you “Personally Identifiable Information”.
- 2.5 We collect some data from you when you browse on The Reading Agency website(s) (your “Behavioural Data”, and “Audience Information”). This data includes your age, gender, viewing history, IP addresses, device identifiers and information about how long you have stayed on certain pages or what pages you have clicked on. You can find more detailed information about this in Section 3 – Cookies and Section 4 – Log files.”
- 2.6 We may also collect Behavioural Data and Audience Information about your use of particular services provided by The Reading Agency (or our partners).
- 2.7 We use Behavioural Data and Audience Information in anonymised form to allow us to analyse and report how our services are used and the characteristics of our users.

### **3. Cookies**

- 3.1 The Reading Agency uses cookies. Cookies are small text files that are often created when you visit a website, and which are stored in the cookie directory of your computer. We use temporary cookies (called session cookies). Session cookies disappear when you leave our websites and close your browser. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features will not function as a result.
- 3.2 Our cookies are used for the following purposes:
- 3.2.1 to count the number of times you return to the site and the pages that you visit. This helps us improve our site and identify redundant material
  - 3.2.2 to store your logged in status. Once you have logged in to The Reading Agency a cookie will help your computer to automatically log in again in the future, until you explicitly log out
- 3.3 The information stored in our cookies is kept separate from your data and will never be used with it.
- 3.4 If you want to delete any cookies that are already on your computer, please refer to the instructions for your file management software to locate the file or directory that stores cookies.
- 3.5 Please note that by deleting our cookies or disabling future cookies you will not be able to access certain areas or features of our site.

## **4. Log files**

- 4.1 Log files record visitors' use of the site. We can collect information about site usage from the data contained in these logs, which we obtain from third parties. Log files do not contain any personal information and they are not used to identify any individual person's use of the site.
- 4.2 When a visitor requests any web page from our website, our web servers automatically obtain that visitor's domain name and IP address. The domain name and IP address reveal nothing personal about you other than the IP address from which you have accessed our site. We use this information to examine our traffic in aggregate, to investigate abuse of the website and its users, and/or to cooperate with law enforcement. We do not disseminate this information to third parties except in aggregate.
- 4.3 We also collect information that you voluntarily provide to us when you contact us with queries, complaints, and comments or praise (Voluntary Data).
- 4.4 We also collect anonymised publicly available information from social networking sites such as Facebook and Twitter, for example likes, shares, tweets and posts about The Reading Agency. This information is provided to us by a third party and is fully anonymised so we cannot see who has posted the information. This information is used for analysis purposes.

## **5. What do we use your data for?**

It is important that you understand how and why we use the personal data that we collect about you. This section sets out the different purposes for which we process personal data and which types of personal data we need for each purpose.

### **5.1 Managing your account and providing you with our services**

- 5.1.1 We use your Account Data to set up, manage and administer your account, to log you into your account and to provide you with other services that you request from us.
- 5.1.2 We use your Account Data to contact you occasionally with service messages about The Reading Agency and other products and services you have signed up for, for example to provide you with messages concerning the delivery of services, password reminders, where your account is due to expire or to contact you about content you have submitted to us. If you create an account on one of our websites, we will also use your contact details to contact you from time to time to ask you to participate in surveys to help us to improve our offerings.
- 5.1.3 We use your Voluntary Data to enable us to respond to queries, complaints or comments that you have made and to make sure that these are appropriately dealt with. If Voluntary Data you provide includes any special categories of personal data (such as information about your health, race or religion), you must make sure before you provide this that you are happy for us to use that Voluntary Data for the purposes set out in this Privacy Policy.

### **5.2 Competitions and surveys**

- 5.2.1 If we run a competition or ask questions of users of our services, we may collect data to allow us to conduct those exercises. Each may contain personal data where necessary for the purpose of those exercises.

- 5.2.2 We collect information about you when you participate in competitions, such as your contact information (your- “Competition Data”) and use Competition Data for the purposes of allowing you to participate in competitions and to carry out any activities required in relation to those competitions, for example contacting you to let you know you have won a prize and using your address to send your prize to you. This data is only used for the purposes of the relevant competition and will be subject to the terms and conditions of that competition, which will be notified to you when you enter the competition.
- 5.2.3 We collect information when you choose to sign up to and respond to surveys and polls. These help us to understand your opinions, views and attitudes. We will collect information about you including your name, contact details and survey responses (your “Survey Data”). Survey Data is purely used for the purposes of analysing insights and information to enable us to improve our services.

### **5.3 Improving and analysing our services**

- 5.3.1 We use Account Data, Behavioural Data, Audience Information, Voluntary Data and Survey Data to help us monitor, analyse and improve The Reading Agency’s offering. We use this data to help us understand which content and services are most interesting and enjoyable for our users and to help us identify errors and test features. This helps us to make sure that we are providing you with the best possible products and services.
- 5.3.2 We use anonymised Account Data, Behavioural Data, Audience Information, Voluntary Data and Survey Data to analyse the effect, reach and other attributes of our services and their users. We use such anonymised data for the purposes of research, the creation of new programmes and services, presenting information about our services and users internally and to third parties to further The Reading Agency’s charitable purposes and to publicise our work. This helps us to continue to improve our products and services, to obtain funding and support for our activities and to assist the work of other organisations.

### **5.4 Marketing**

- 5.4.1 We and our partners in providing our services will use your email address to send you email marketing (including our newsletter, information about our products and services, rewards and competitions) where you have signed up to receive this from us.
- 5.4.2 You can opt out of receiving marketing emails at any time by following the instructions to unsubscribe in any of our email marketing communications. It can take up to 48 hours for your change in preference to take effect and the change will not affect any marketing emails that have already been scheduled to be sent in the future.
- 5.4.3 If you opt out of email marketing, we will still need to send you service communications by email from time to time, such as information about changes to our services.
- 5.4.4 We or our partners in providing our services may also use your postal address to send you information about other services or products where you have signed up to receive this from us.

## 5.5 Information from Children Under 13

- 5.5.1 The Reading Agency strongly believes in protecting the privacy of children. The safety and wellbeing of a child is of paramount importance to us. In line with this belief, we do not knowingly collect or maintain Personally Identifiable Information about children without obtaining consent from whoever holds parental responsibility for the child.
- 5.5.2 When children register, we ask them to give us the email address of a parent or guardian or employee of any childcare organisation registering on their behalf, if appropriate and with the express consent of a parent or guardian; this email address is never passed on to third parties other than third party partners in the provision of the services in question or with explicit consent. We use this email address to enable children who have forgotten their username and/or password to access the site again. For children who enter a competition, we will use it to let them know if they have won a prize.
- 5.5.3 The [Book Sorter](#) on the Summer Reading Challenge website provides reading recommendations based on books other children have enjoyed. All the books have been recommended, rated and reviewed by children using this website. We ask children to submit a date of birth when they register so that Book Sorter recommendations can be tailored for different age groups. We may also use age information in anonymised form for the purposes of improving and analysing our services as set out under 5.3 above.
- 5.5.4 Children have the option of posting messages to the Chat page to tell us how they're getting on with the Summer Reading Challenge and share the books they are enjoying with other readers. All messages sent through Chat go directly to our moderator, and nothing is displayed on the site that breaks the rules of our [strict code of conduct](#).
- 5.5.5 Children cannot message each other independently – they can only send messages via the Chat page (and through our moderator).
- 5.5.6 When children register on our site, they are given a fun username and can select an avatar. When they visit the site, they log-in using this username and their chosen password. We never use children's real names or allow messages with real names to be posted on our site. Similarly, any personal information such as addresses, and phone numbers are never displayed. Messages containing any personal information will be blocked by our moderators.

## 6. What is our legal basis for using your data?

- 6.1 Data protection law says that we have to tell you the legal basis that we rely on to process your personal data for the purposes that we have notified to you. This section tells you what that legal basis is in relation to each of the purposes set out above.
- 6.2 With the exception of marketing, we process your personal data for all of the purposes identified under **What do we use your data for?** above on the basis that it is in our legitimate interests, or the legitimate interests of third parties with whom we share your data, to carry out these activities, in particular for the purposes of carrying out the charitable activities of The Reading Agency.

- 6.3 If you have given consent for use of your data for email marketing or other marketing, we do so with your consent and in the legitimate interests of The Reading Agency.
- 6.4 If you have given consent for use of your data by third parties for email marketing or other marketing, they do so with your consent.

## **7. Who do we share your data with?**

- 7.1 We may need to share your personal data with some third parties in some circumstances. This includes where we use third party suppliers to perform various services for us. The third-party suppliers we share your personal data with are as follows:
  - 7.1.1 Third party service providers who help us to manage our customer database and registration process
  - 7.1.2 Third party service providers or partners who help us in the delivery of our services, such as (but not limited to) libraries, government agencies or other charities
  - 7.1.3 Third party service providers who help us to manage our Viewer Enquiries process
  - 7.1.4 Other service providers such as information security service providers who help us to manage our IT systems and ensure that they are secure
- 7.2 We will also share your personal data with third parties in the following circumstances:
  - 7.2.1 Where you have specifically consented to us sharing your data with a particular third party
  - 7.2.2 Where we are required or permitted to do so by law or to protect or enforce our rights or the rights of any third party.
- 7.3 Where we share your personal data with third parties other than third party suppliers, we do so subject to data sharing agreements which define the use to which the third party is entitled to process the data and by which the third party agrees to safeguard your data.
- 7.4 You should be aware that some recipients of your personal information (as set out above) may be located outside the UK.
- 7.5 Where we (or a Data Processor acting on our behalf) transfer your personal information to countries outside of the UK, we will put in place such measures as are required by law to ensure that those transfers are adequately protected, including but not limited to using all appropriate cross-border transfer solutions.

## **8. How long will The Reading Agency keep my information?**

- 8.1 We keep your Personally Identifiable Information for no longer than necessary for the purposes for which the Personally Identifiable Information is processed. The length of time we retain Personally Identifiable Information for depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.
- 8.2 We will keep your information for as long as disclosure is required or permitted by law (for example to government bodies and law enforcement agencies, including for child protection reasons). The Reading Agency will not share your information for marketing purposes with any other organisations.

- 8.3 We will hold your personal information on our systems for as long as is necessary for the relevant activity, if you delete your passport account then your personal information is deleted immediately, and the remaining information is anonymised for analytical purposes.
- 8.4 If your account is inactive for a period of two years, we will send you a reminder email to remind you to use your account. If you still do not use your account, we will send a further reminder email before deleting your account and anonymising your personal data as set out above.
- 8.5 We will need to keep your data after account closure for limited purposes, for example if we need your data in order to respond to any complaints or claims that you make. If this is the case, we will only keep the data for as long as we need to in order to fulfil those purposes.
- 8.6 We keep information relating to any service errors or interruptions you have experienced for between 15-30 days.

## **9. Confidentiality & Security of Personally Identifiable Information**

- 9.1 We consider the confidentiality and security of your information to be of the utmost importance. We will use industry standard physical, technical and administrative security measures to keep your Personally Identifiable Information confidential and secure and will not share it with third parties, except as otherwise provided in this Privacy Policy, or unless such disclosure is necessary in special cases, such as a physical threat to you or others, as permitted by applicable law. Because the Internet is not a 100% secure environment, we cannot guarantee the security of Personally Identifiable Information, and there is some risk that an unauthorized third party will find a way to circumvent our security systems or that transmission of your information over the Internet will be intercepted. It is your responsibility to protect the security of your login information. Please note that e-mail communications are typically not encrypted and should not be considered secure.

## **10. Access to your information and contacting The Reading Agency**

- 10.1 You have certain rights in relation to your Personally Identifiable Information. You can access your Personally Identifiable Information and confirm that it remains correct and up-to-date or choose whether or not you wish to receive material from us or some of our partners by logging into the site and visiting your user account page.
- 10.2 If you would like further information in relation to your rights or would like to exercise any of them, you can also contact us via [dataprivacy@readingagency.org.uk](mailto:dataprivacy@readingagency.org.uk). If you reside, or are located in the UK, you have the right to request that we:
- 10.2.1 provide access to any Personally Identifiable Information we hold about you
  - 10.2.2 prevent the processing of your Personally Identifiable Information for direct marketing purposes
  - 10.2.3 update any Personally Identifiable Information which is out of date or incorrect
  - 10.2.4 delete any Personally Identifiable Information which we are holding about you
  - 10.2.5 restrict the way that we process your Personally Identifiable Information
  - 10.2.6 provide your Personally Identifiable Information to a third-party provider of services; or

- 10.2.7 provide you with a copy of any Personally Identifiable Information which we hold about you.
- 10.3 We try to answer every email promptly where possible and provide our response within the time period stated by applicable law. Keep in mind, however, that there will be residual information that will remain within our databases, access logs and other records, which will or will not contain your Personally Identifiable Information. Please also note that certain Personally Identifiable Information will be exempt from such requests in certain circumstances, which will include if we need to keep processing your Personally Identifiable Information to comply with a legal obligation.
- 10.4 When you email us with a request, we will ask that you provide us with information necessary to confirm your identity. We will respond to your request within one month.

## **11. How to contact us**

- 11.1 The Reading Agency has appointed a Data Protection Officer (DPO) who has ultimate responsibility for making sure your data is treated in accordance with this Privacy Policy and the law. Our DPO can be contacted by emailing [dataprivacy@readingagency.org.uk](mailto:dataprivacy@readingagency.org.uk).
- 11.2 Alternatively, you can contact us at: The Reading Agency, 24 Bedford Row, London WC1R 4EH if you have any questions about our privacy policy, or information we hold about you.

## **12. Changes to our privacy policy**

- 12.1 We keep our privacy policy under regular review, and we will place any updates on this web page. This privacy policy was last updated 7 April 2022.