



# Bookmark

## Website Privacy Policy

### Website Privacy Policy

#### Background

This Website Privacy Policy applies only to online information-gathering on our website. Bookmark Reading Charity understands that your online privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, [www.bookmarkreading.org](http://www.bookmarkreading.org) ("Our Site"), and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

Please read this Website Privacy Policy carefully and ensure that you understand it.

Bookmark's Website Privacy Policy may change so please remember to check back from time to time. This version was last updated on 11/04/22.

#### 1. Definitions and interpretations

1.1 In this Policy, the following terms shall have the following meanings:

<b>"personal data"</b>	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and
<b>"we/us/our"</b>	means Bookmark Reading Charity, a company limited by guarantee in England and Wales with registered number 11104438 and a registered charity in England and Wales under charity number 1177681, whose registered address is 3 <sup>rd</sup> Floor, Charles House, 5-11 Regent Street, London SW1Y 4LR.



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### 2. Information about us

- 2.1 Our Site, [www.bookmarkreading.org](http://www.bookmarkreading.org), is operated by Bookmark Reading Charity.
- 2.2 We are a “data controller” for the purposes of the EU General Data Protection Regulation 2016/679 and the Data Protection Act 2018 (“Data Protection Laws”). This means that we are responsible for, and control the processing of, your personal data. For further information about our privacy practices, please contact our Data Protection Officer, Stuart Beattie, via email at [stuart.beattie@bookmarkreading.org](mailto:stuart.beattie@bookmarkreading.org).

### 3. What does this policy cover?

- 3.1 This Website Privacy Policy applies only to your use of Our Site. Our Site may make available third-party services or contain links to and from websites or affiliates such as Amazon. Any information which is collected on Our Site when you access a third-party service is processed under this Website Privacy Policy. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy notices of any such websites before providing any data to them.

### 4. Your rights

- 4.1 As a data subject, you have the following rights under Data Protection Laws, which should you wish to exercise any of, please contact our Data Protection Officer:
  - 4.1.1 The right to be informed about our collection and use of personal data;
  - 4.1.2 The right of access to the personal data we hold about you (see section 13 for how to access);
  - 4.1.3 The right to withdraw your consent for us to use your personal data, in particular, if you have given us consent to send you marketing emails, you can withdraw your consent via the unsubscribe link in any marketing email you receive from us, or by emailing us at [info@bookmarkreading.org](mailto:info@bookmarkreading.org);
  - 4.1.4 The right to rectification if any personal data we hold about you is inaccurate or incomplete (please contact us using the details in section 14);
  - 4.1.5 The right to be forgotten i.e. the right to ask us to delete any personal data we hold about you (we only hold your personal data for a limited time, as explained in section 6 but if you would like us to delete it sooner, please contact us using the details in section 14). Please note we will confirm whether the information has been deleted or tell you the reason why it cannot be deleted;
  - 4.1.6 The right to restrict the processing of your personal data by us;
  - 4.1.7 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation), if applicable;
  - 4.1.8 The right to object to us using your personal data for particular purposes. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue – for example, we may need to continue to hold your information for safeguarding, regulatory or legal reasons; and



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- 4.1.9 You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless the decision is required or authorised by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.
- 4.2 If you have any cause for complaint about our use of your personal data, please contact us using the details provided in section 14 and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office, at <https://ico.org.uk/>.
- 4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.
- 5. What data do we collect?**
- 5.1 We collect information through your use of Our Site, including when you: register your interest as a volunteer, corporate partner, local authority, charity or school; contact us for more information about the charity (including our e-newsletter) and our fundraising efforts; engage with us via blogs and news articles on Our Site; and make a one off or ongoing monthly donations.
- 5.2 The information collected and retained by us directly or indirectly, as provided by you on Our Site, will include some or all of the following personal and non-personal data:
- 5.2.1 full name;
  - 5.2.2 company name;
  - 5.2.3 phone number
  - 5.2.4 email address
  - 5.2.5 organisation name and postcode;
  - 5.2.6 role within organisation;
  - 5.2.7 contact information such as email addresses and/or telephone numbers; and
  - 5.2.8 how you heard about us.
- 5.3 We automatically collect certain information when you first visit, use or navigate Our Site. This information does not reveal your specific identity (such as your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs and the site you exit to, device name, country, location, information about how and when you use Our Site and other technical information. This information is primarily needed to maintain the security and operation of Our Site, and for our internal analytics and reporting purposes.
- 5.4 Like many companies, we may use cookies and similar technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our [Cookie Policy](#).
- 5.5 All information you provide to us must be true, accurate and complete, and you must notify us of any changes to such personal information.



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### 6. How do we use your data?

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of an agreement with you, because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests. Specifically, we may use your data for the following purposes:
- 6.2.1 Supplying our products **AND/OR** services to you (please note that we require your personal data in order to enter into an agreement with you);
  - 6.2.2 Personalising, safeguarding and tailoring our services for you;
  - 6.2.3 Replying to emails from you;
  - 6.2.4 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by emailing [info@bookmarkreading.org](mailto:info@bookmarkreading.org) with a subject line of REMOVE FROM MAIL LIST); and/or
  - 6.2.5 Market research.
- 6.3 With your permission and/or where permitted by law, we may also use your data for marketing purposes, which may include contacting you by email, telephone and/or post with information, news, and offers on our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 6.4 You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it.
- 6.5 We will retain your personal data in accordance with our [Data Retention and Destruction Policy](#). We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected on our Site, including for the purposes of satisfying any safeguarding, legal, accounting or reporting requirements. If you would like any further information, please contact our Data Protection Officer.

### 7. Where do we store your data and how do we keep it safe?

- 7.1 The data about you collected from our website will only be stored in the UK.
- 7.2 Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure data collected through Our Site. We have implemented appropriate technical and organisational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal data to and from Our Sites is at your own risk. You should only access the services within a secure environment.



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### 8. How long do we keep your information?

8.1 We will retain your personal data in accordance with our [Data Retention and Destruction Policy](#). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it, or, if this is not possible (for example, because safeguarding, legal, accounting or reporting requirements require a copy to be maintained), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

8.2 We will comply with our obligations and safeguard your rights under the GDPR at all times.

### 9. Do we share your data?

9.1 Subject to section 9.2, we will not share any of your data with any third parties for any purposes.

9.2 In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal obligations, a court order, or a request by a governmental authority.

9.3 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective donors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

### 10. What happens if our operations changes hands?

10.1 We may, from time to time, expand or reduce our operations and this may involve the transfer of control of all or part of our operations. Any personal data that you have provided will, where it is relevant to any part of our operations that is being transferred, be transferred along with that part and the new controlling party will, under the terms of this Website Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by us.

10.2 In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted, you will be given the choice to have your data deleted or withheld from the new controller.



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### 11. Sensitive information

11.1 We give special protection to personal information that is particularly sensitive if we collect it. This could be information about your health status, racial or ethnic origin, political views, religion or similar beliefs, sex life or sexual orientation, genetic or biometric identities, trade union membership ('special categories' of personal data) or about criminal convictions or offences.

11.2 Where we collect any special categories of personal data or criminal convictions or offences information about you, we will take appropriate steps to ensure that we have explicit consent or another legal basis to hold, use or retain the information.

### 12. Your right to withhold information

You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

### 13. How can you access your data?

You have the right to ask for a copy of any of your personal data held by us ("Subject Access Request"). Information about how individuals can make a Subject Access Request to us is set out in our [Subject Access Request Policy](#).

### 14. Contacting us

If you have any questions about Our Site or this Website Privacy Policy, please contact us by email at [info@bookmarkreading.org](mailto:info@bookmarkreading.org). Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you (as under section 13, above).

### 15. Changes to our Website Privacy Policy

We may change this Website Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Website Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up to date.