

World Book Day: Privacy Policy

Approved by: Board of Trustees Date: September 2024 Review interval: 1 year Next review due: September 2025 Employee lead(s): Cassie Chadderton, Chief Executive / Amy Birch, Finance Manager Trustee Lead: Will Obbard

Purpose

The purpose of this policy is to protect the privacy and security of anyone that shares their personal information with World Book Day in any way including through our website or by entering competitions or promotions. A copy of this policy must be displayed on our website.

Who is covered by this policy?

All staff, trustees, volunteers, beneficiaries and individuals World Book Day interacts with, including stakeholders, partners, suppliers, members of the public engaging with our work and anyone using our website or entering our competitions and/or promotions.

What is covered by this policy?

World Book Day, we are committed to protecting the privacy and security of anyone that shares their personal information with us including our website visitors. This privacy policy explains the what, how and why of the information we collect when you visit our website (<u>www.worldbookday.com</u>), enter any of our competitions/promotions or share your data with us in any way. It also explains the specific ways we use and disclose that information. (Website statement: By using our website you acknowledge you have read and understood this privacy policy.)

Under GDPR regulations, the data controller is World Book Day Limited.

This privacy policy explains:

- What personal information we collect and how we use it
- Cookies and other technologies
- Who we share this information with
- How we use your data in marketing materials
- How we protect and store your information and for how long
- Your rights
- Where to direct your questions and concerns about this policy
- What will happen if we make changes to this page

If you are under 18 you must inform a parent or guardian before you use our website to obtain their agreement to the privacy policy before subscribing to our newsletter or entering a competition/promotion.

How we use your information

We use your information in a number of different ways. Below you will be able to see exactly how we use the information we collect:

What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery and third party referrals**:

- Names and contact details
- Addresses
- Website user information (including user journeys and cookie tracking)
- Information relating to compliments or complaints

We collect or use the following information to **receive donations or funding and organise fundraising activities**:

- Names and contact details
- Addresses
- Donation history
- Tax payer information (for Gift Aid purposes)

We collect or use the following personal information for **service updates or marketing purposes**:

- Names and contact details
- Marketing preferences
- Website and app user journey information
- Records of consent, where appropriate

We collect or use the following personal information for **research or archiving purposes**:

• Names and contact details

- Recorded images, such as photos or videos
- Records of consent, where appropriate

We collect or use the following personal information for **recruitment purposes**:

- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Details of any criminal convictions (eg Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)

We also collect or use the following information for **dealing with queries, complaints or claims**:

- Names and contact details
- Correspondence

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- Your right of access You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. You can read more about this right here.
- Your right to rectification You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. You can read more about this right here.
- Your right to erasure You have the right to ask us to delete your personal information. You can read more about this right here.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal information. You can read more about this right here.
- Your right to object to processing You have the right to object to the processing of your personal data. You can read more about this right here.

- Your right to data portability You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. You can read more about this right here.
- Your right to withdraw consent When we use consent as our lawful basis you have the right to withdraw your consent at any time. You can read more about this right here.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and goods**, **including delivery and third party referrals** are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
- Improving the performance of our services

Our lawful bases for collecting or using personal information to **receive donations or funding and organise fundraising activities** are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

• Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information for **research or archiving purposes** are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
- To improve the services we offer

Our lawful bases for collecting or using personal information for **recruitment purposes** are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **dealing with queries**, **complaints or claims** are:

• **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information for responses to **competitions and promotions** are:

• **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Why we collect your information for competitions and promotions:

- To help us fulfil competitions We need to use this information in order to contact you if you have won a World Book Day competition/promotion or ensure that your prize reaches you safely and securely. If we don't know who you are, we aren't able to provide you with the prize.
- To send you information via email We only do this with your permission to help keep you up-to-date on World Book Day news, events and competitions.

If you choose not to consent to giving us any of the information above, you may be unable to enter any World Book Day competitions or promotions.

Our lawful bases for collecting or using personal information from your use of our website:

• **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

How we use information we collect about you from your use of our website:

Like many other organisations, we use cookies to collect information about your time on the World Book Day website (for more detailed information please see the Cookies section below)

We will use this information in our legitimate interests, where we have considered these are not overridden by your rights, to ensure that:

- Content from our site is presented in the most effective manner for you and for your computer.
- We provide you with the information, products and services that you request from us.
- To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To keep our website safe and secure.
- To improve our website to ensure that content is presented in the most effective manner for you and for your computer.
- To allow you to participate in interactive features of our website, when you choose to do so.

Cookies

Cookies are very small files that are sent to your device, which store information about your visit to **www.worldbookday.com**. We use the following types of cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our website and under our terms with you.
- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us for our legitimate interests of improving the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Disabling cookies

The effect of disabling cookies depends on which cookies you disable but, in general, the website may not operate properly if all cookies are switched off.

If you want to disable cookies on our site, you need to change your website browser settings to reject cookies. How you can do this will depend on the browser you use. Further details on how to disable cookies for the most popular browsers are set out below:

For Microsoft Internet Explorer:

- 1. Choose the menu "tools" then "Internet Options"
- 2. Click on the "privacy" tab
- 3. Select the setting the appropriate setting

For Google Chrome:

- 1. Choose Settings> Advanced
- 2. Under "Privacy and security," click "Content settings".
- 3. Click "Cookies"

For Safari:

- 4. Choose Preferences > Privacy
- 5. Click on "Remove all Website Data"

For Mozilla Firefox:

- 6. Choose the menu "tools" then "Options"
- 7. Click on the icon "privacy"
- 8. Find the menu "cookie" and select the relevant options

For Opera 6.0 and further:

- 9. Choose the menu Files"> "Preferences"
- 10. Privacy

Where you have not set your permissions, we may also separately prompt you regarding our use of cookies on the Site. By using the site you agree to accept cookies. All core parts of the site will function without cookies, however certain features required this i.e. favourites etc.

Our website uses cookies to distinguish you from other users and enhance your user experience. They also help us improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

Marketing

If you have given us permission, we'll send you marketing by email to keep you up-to-date with the goings-on at World Book Day.

To stop receiving marketing from World Book Day:

Click the 'Unsubscribe' link on the bottom of any marketing email you receive from us.

Contact hi@worldbookday.com

If you do either of the above we will update your preferences so that you do not receive any further marketing from us.

Where we get personal information from

- Directly from you
- Family members or carers
- Schools, colleges, universities or other education organisations

How long we keep information

World Book Day will process personal data that may identify a stakeholder, partner, supplier or other individual according to the UK GDPR. Customer data will be processed in the <u>legitimate interest</u> of World Book Day work and/or if World Book Day has a contractual or legal obligation. Such data may be retained indefinitely or in accordance with a legal or contractual obligation where such data is for accounting purposes.

We will only hold on to your information for as long as is needed to provide you with our service. If necessary, we will hold onto your information after a competition or promotion has ended in order to meet legal or regulatory requirements, and to enforce our terms and conditions.

All information you provide to us is stored on our secure servers.

Your personal data and the content you submit will not be shared outside of the World Book Day organisation.

All data will be treated as personal under the 1998 Data Protection Act and will be stored securely.

If you wish for your files to be deleted from our website or social media platforms and removed from the World Book Day archive, please email hi@worldbookday.com.

Please note that if a child or their family withdraw consent for an image to be shared, it may not be possible to delete images that have already been shared or published. If you have further questions regarding how your content will be used, please email hi@worldbookday.com.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted via our website or other digital means (such as email) any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Our website may, from time to time, contain links to external sites. We are not responsible for the privacy policies or the content of such sites.

Public forums

The website may, from time to time, make chat rooms, message boards, news groups and/or other public forums available to its users. Any information that is disclosed in these areas becomes public information and you should exercise caution when using these and avoid posting any personal information.

Your rights

You have the right under certain circumstances:

- to be provided with a copy of your personal data held by us;
- to request the rectification or erasure of your personal data held by us;
- to request that we restrict the processing of your personal data (while we verify or investigate your concerns with this information, for example);
- to object to the further processing of your personal data, including the right to object to marketing;
- to request that your provided personal data be moved to a third party.

Your right to withdraw consent:

Where the processing of your personal information by us is based on consent (e.g. for marketing communications), you have the right to withdraw that consent without detriment at any time by contacting us (**hi@worldbookday.com**) or clicking the unsubscribe option at the bottom of any promotional email.

If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority,

(see http://ec.europa.eu/justice/dataprotection/bodies/authorities/index_en.html).

Questions or concerns

If you would like to see more information about World Book Day's safeguarding policy and procedures, including how World Book Day ensures the safety and wellbeing of children and young people online and when photographs and videos are used, please see <u>here</u>.

If you have any concerns about how your images are being shared please contact World Book Day's Safeguarding Officer, Cassie Chadderton or the NSPCC Helpline on 0808 800 5000. The Information Commissioner is the supervisory authority in the UK and can provide further information about your rights and our obligations in relation to your personal data, as well as deal with any complaints that you have about the processing of your personal data.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint

Changes to our policy

We may make changes to this policy occasionally, reflecting how we use and process your data. If we make any significant changes to our privacy policy, we will ensure that you are kept up-to-date via our website, social media or other services, such as email, so that you are able to review the changes before continuing to use the World Book Day website.

See also

- Data Protection Policy
- Safeguarding Policy