



Volunteer Privacy Policy

1. WHO WE ARE

We are Bookmark Reading Charity ("Bookmark", "we", "us", "our").

Bookmark is the controller of, and is responsible for, your personal data obtained when you volunteer for us, meaning that we are the organisation legally responsible for deciding how and for what purposes your personal data is used.

2. THIS PRIVACY POLICY

Thank you for choosing to be part of our community and joining our reading volunteer programme. We understand that your privacy is important to you and that you care about how your personal data is used and shared. We are committed to protecting your personal information and your right to privacy.

Please read this volunteer privacy policy (the "**Policy**") carefully as it contains important information on who we are and how and why we collect, store, use and share any information relating to you (your **personal data**) in connection with your volunteering with us.

Please note that the Policy does not cater for our collection or use of your personal data in relation to our website, www.bookmarkreading.org. For further information as to how we collect and use your personal data in relation to our website, please see our Website Privacy Policy.

This Policy also explains your rights in relation to your personal data and how to contact us, or the UK's data protection regulator in the event you have a complaint.

If you have any questions or concerns about this Policy, or our practices with regards to your personal data, please contact us using the details below.

3. PERSONAL DATA WE COLLECT ABOUT YOU

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you (dependent upon the circumstances of your volunteering with us) which we have grouped together as follows:

- **Identity Data** includes first name, last name, age, date of birth, ethnicity, diversity and inclusion data;
- **Contact Data** includes address, postcode, email address and telephone numbers;

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- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website;
- **Profile Data** includes your username and password, your education and/or employment history, country of residence, history of residence, reference information, DBS check and result, accessibility requirements, mobility or other additional requirements or needs;
- **Usage Data** includes information about how you interact with and use our website and our Volunteer Hub;
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

Our volunteer-led reading programmes are available to volunteers aged from 16+. Our volunteer programmes are not intended for those aged below 16 years, and we do not knowingly collect personal data relating to any volunteer aged below 16.

4. HOW YOUR PERSONAL DATA IS COLLECTED

We use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us your personal data when you complete our online volunteer registration form, create an account on and use our Volunteer Hub, access and use our online training and learning platform, or by otherwise corresponding with us by post, phone, email or otherwise.
- **Automated technologies or interactions.** As you interact with our Volunteer Hub or our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see our Cookies Policy for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources, including:
 - Identity and Contact Data which is collected from publicly available sources such as the Disclosure and Barring Service (where a DBS check is conducted).

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5. HOW WE USE YOUR PERSONAL DATA

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of an agreement with you:** Where we need to perform the agreement we are about to enter into or have entered into with you;
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law);
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis; and
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we will use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

PURPOSE/USE	TYPE OF DATA	LEGAL BASIS
To register you as a new volunteer with us, which will include: a) completing your application process; b) facilitate our group interview process with you; c) providing our training programme to you; d) registering your account on our	a) Identity b) Contact c) Profile	a) Performance of an agreement with you; and b) Necessary to comply with a legal obligation. ¹

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<p>Volunteer Hub; and</p> <p>e) conducting identity verification and/or DBS checks (as applicable).</p>		
<p>To facilitate your face-to-face or virtual volunteering with the relevant schools, which will include:</p> <p>a) liaising with the relevant schools and sharing your information with the same to facilitate your volunteering services;</p> <p>b) facilitating your access to our online library and training resources, and virtual meeting solutions; and</p> <p>c) recording any virtual reading session you conduct for moderating and safeguarding purposes.</p>	<p>a) Identity b) Contact c) Profile</p>	<p>a) Performance of an agreement with you; and</p> <p>b) Necessary for our legitimate interests (to ensure that our reading sessions are moderated for quality monitoring purposes).</p>
<p>To manage our relationship with you which will include:</p> <p>a) notifying you about changes to our volunteer programme, or to our volunteer terms and conditions and policies and/or this Policy; or</p> <p>b) dealing with your requests, complaints and queries.</p>	<p>a) Identity b) Contact c) Profile</p>	<p>a) Performance of an agreement with you; b) Necessary to comply with a legal obligation; and</p> <p>c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you).</p>
<p>To monitor your progress and your volunteering activities with us and report on the same to your employer or school/college (as applicable), which will include:</p> <p>a) notifying your employer or school/college about your</p>	<p>c) Identity d) Contact e) Profile f) Usage Data</p>	<p>a) Necessary for our legitimate interests (to monitor the activities of our volunteers and manage our relationship with relevant employers or</p>

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<p>application progress; and</p> <p>b) notifying your employer or school/college about your activity with us, such as the number of sessions you have delivered as a volunteer and when these sessions took place.</p>		<p>schools/colleges).</p>
<p>To comply with our legal and regulatory obligations that apply to our organisation, including in relation to safeguarding policies and checks, and responding to complaints, enquiries and investigations by third parties and safeguarding bodies.</p>	<p>a) Identity b) Contact c) Profile</p>	<p>a) Necessary to comply with a legal obligation.</p>
<p>To send you relevant marketing communications, including in relation to our reward recognition scheme.</p>	<p>a) Identity b) Contact c) Profile d) Marketing and Communications</p>	<p>a) Consent (having obtained your consent to receiving direct marketing communications); and b) Necessary for our legitimate interests (to carry out direct marketing and develop our services and grow our organisation and to support more children).</p>
<p>To ensure our relevant charity policies and terms and conditions (in place from time to time) are adhered to and enforced.</p>	<p>a) Identity b) Contact c) Profile</p>	<p>a) Performance of an agreement with you; and b) Necessary for our legitimate interests (to ensure our policies are enforced and adhered to).</p>
<p>To carry out research, including through your voluntary</p>	<p>a) Identity b) Contact</p>	<p>a) Necessary for our legitimate interests (to</p>

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participation in surveys, including where we request feedback from you.	c) Profile	study the experience of our reading volunteers and to help us improve and develop our services).
To 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 newly controlling party will, under the terms of this Policy, be permitted to use that data only for the same purposes for which it was originally collected by us.	a) Identity b) Contact c) Profile	a) Necessary to comply with a legal obligation; and b) Necessary for our legitimate interests (in expanding or reducing our charitable operations).
To administer and protect our website, the Volunteer Hub, and our online training and library resources (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	a) Identity b) Contact c) Profile	a) Necessary for our legitimate interests (for running our organisation, provision of administration and IT services, and to maintain network security and the operation of our website, the Volunteer Hub and our online training and library resources).

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6. SPECIAL CATEGORY PERSONAL DATA

In certain instances, we may collect and use certain personal data which is treated as special category (sensitive) personal data under UK data protection laws, for example for diversity and inclusion purposes. Special category personal data has additional protections which apply. The special category personal data which we may collect includes:

- data revealing racial or ethnic origin;
- data revealing sexuality or gender; and/or
- data concerning health, including disability.

Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, e.g.:

- we have your explicit consent;
- the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent; or
- the processing is necessary to establish, exercise or defend legal claims.

7. MARKETING

We will use your personal data to send you updates about our volunteering opportunities.

We have a legitimate interest in using your personal data for marketing purposes (see **How We Use Your Personal Data**, above). This means we usually do not need your consent to send your marketing information. If we change our marketing approach in the future so that consent is needed, we will ask for this separately and clearly.

You do, however, have the right to opt-out of receiving marketing communications in the preferences centre of your volunteer hub account or by contacting us by email at marketing@bookmarkreading.org.

8. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data where necessary with the parties set out below (for the purposes set out in the table above):

- the schools and charities we partner with in order to deliver our reading services, including to connect you with such schools for the purpose of the reading sessions, report to your school/college in relation to your volunteering activities, and undertaking safeguarding and identity verification checks (where applicable). We may also share such information with your employer (where you have volunteered with us for such purposes through our corporate volunteering programme);

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- third parties we use to help run and facilitate our online services and functions, including in relation to our Volunteer Hub, online training courses and library. Which includes:
 - Bramble Technologies Limited (**Bramble**), who provide IT infrastructure in relation to the virtual meetings used for our reading sessions prior to 31 August 2024. Further information regarding Bramble can be found in [Bramble's Privacy Policy](#);
 - VEDAMO EAD (**Vedamo**), who provide IT infrastructure in relation to virtual meetings for our reading sessions after 1 September 2024. Further information relating to Vedamo can be found in [VEDAMO' Privacy Policy](#);
 - Loop Online Limited (**Loop**), who provide the online learning management system for our online training. Further information regarding Loop can be found in [Loop's Privacy Policy](#);
 - 360Learning Ltd (360Learning), who provide the online learning management system for our online training and volunteer engagement tool. Further information regarding 360 Learning can be found in [360 Learning's Privacy Policy](#);
 - Guild Digital Ltd (**Guild**), who provide our volunteer engagement tool. Further information regarding Guild can be found in [Guild's Privacy Policy](#); and
 - such other third-party service providers and consultants, including suppliers of security checks, translation services, confidential information shredding services, impact reporting services and other charitable services.
- our professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;
- law enforcement agencies, courts, tribunals, and regulatory bodies to comply with our legal and regulatory obligations; and
- third parties to whom we may choose to sell, transfer or merge parts of our charity or our assets. Alternatively, we may seek to acquire other charities or merge with them. If a change happens to our charity, then the new owners may use your personal data in the same way as set out in this privacy policy.

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We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

9. HOW LONG YOUR PERSONAL DATA WILL BE KEPT

We will not keep your personal data for longer than we need it, for the purpose for which it is used.

Different retention periods apply for different types of personal data. Further information regarding how long we keep your personal data can be found in our Data Retention and Destruction Policy.

10. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside of the UK or EEA.

11. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

12. YOUR LEGAL RIGHTS

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- **Request access** to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected. However, please note that we may need to verify the accuracy of the new data you provide to us.
- **Request erasure (deletion or removal)** of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised

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your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object** to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to **object any time to the processing of your personal data for direct marketing purposes.**
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform an agreement with you.
- **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - if you want us to establish the data's accuracy;
 - where our use of the data is unlawful but you do not want us to erase it;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us (see Contact Us, below).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This

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is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month.

Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

13. CONTACT US

If you have any questions about this Policy or about the use of your personal data or you want to exercise your privacy rights, please contact our data protection officer by email via servicedesk@bookmarkreading.org.

14. AUTOMATED DECISION MAKING

You will not be subject to decisions based on automated data processing without your prior consent.

15. COMPLAINTS

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

16. CHANGES TO THIS POLICY

We may change this Policy from time to time (for example, if the law changes).

Any changes will be immediately posted on our website with links to the Policy from our volunteer application form and App. We recommend that you check this page regularly to keep up to date.

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