



General Privacy Policy

1. WHO WE ARE

We are Bookmark Reading Charity ("**Bookmark**", "**we**", "**us**", "**our**"). We are a leading reading charity for primary school children, and we partner with schools to develop whole school reading cultures and provide one-to-one reading support.

Bookmark is the controller of, and is responsible for, your personal data where you provide your personal data to us as described in this Privacy Notice, meaning that we are the organisation legally responsible for deciding how and for what purposes your personal data is used.

2. THIS PRIVACY NOTICE

Bookmark is committed to protecting your personal data.

This Privacy Notice provides information as to how Bookmark collects and uses personal data of both adults and children. Including for the purpose of obtaining parental/guardian permission (where a child is under the age of 16) where required, and in relation to both adults and children (over the age of 16), when accessing and using our reading programmes or attending one of our events (our **Services**), or when personal data is provided to us when using our website (our **Site**), making a donation to us, using the contact us form on our Site, signing up to our newsletter, completing one of our surveys, or otherwise contacting or communicating with us.

This Privacy Notice 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 Privacy Notice, or our practices with regards to your personal data, please contact us using the details below.

Please note that this Privacy Notice does not cater for our collection or use of your personal data when you volunteer with us as on our One-to-one Reading Programme. For further information as to how we collect and use your personal data as a volunteer with us, please see our Volunteer Privacy Policy.

3. I DON'T GET THIS - CAN YOU MAKE IT A BIT EASIER FOR ME?

You can access our Children's Privacy Notice via our website.

4. 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 which we have grouped together as follows:

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- **Identity Data** includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you, including details of any donations made by you to us.
- **Reading Data** includes data about your literacy including your reading preferences.
- **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 our Site.
- **Profile Data** includes your interests, preferences, feedback, and survey responses.
- **Usage Data** includes information about how you interact with and use our Site and our Services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Special Category Data**, including your ability to read and write, your comprehension and vocabulary. See Special Category Personal Data below for further information.

We also collect, use, and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our Site to help improve the Site and our service offering.

5. 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 by filling in forms on our Site or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - enquire about our Services;
 - make a donation to us;
 - request marketing to be sent to you or participate in market research;
 - enter a competition, promotion, or survey; or
 - give us feedback or contact us.

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- **From your parent or guardian:** If you are aged 16 or younger, we get permission from your parent or guardian to use your personal data. Please see our Children's Privacy Notice for further information.
- **From the schools we partner with:** We partner with schools in order to provide our reading Services to as many children as possible. Where we do so, Schools provide your personal data to us as separate controllers, to enable us to organise reading sessions for you.
- **Automated technologies or interactions:** We automatically collect Technical Data when you visit, use or navigate our Site about your device, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our Cookies Policy for further details. Cookies Policy.
- **Contact, Financial and Transaction Data** is collected from providers of technical and payment services such as JustGiving. Further information regarding how JustGiving processes your personal data can be found in Just Giving's Privacy Notice.
- **Technical Data is collected from the following parties:**
 - Third party analytics providers such as **Google Analytics** to help us understand how our customers use the Site – you can read more about how Google uses your personal data in Google's Privacy Policy. You can also opt-out of Google Analytics on Google's website;
 - We use services supplied by our Ad Partners. Please see Disclosures of Your Personal Data below.

6. HOW DO WE USE YOUR 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:

- **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

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- **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 provide you with our charitable Services, including when we: <ol style="list-style-type: none"> provide our reading programmes to you; provide our subscription magazine, The Story Corner to you, or any other magazine or newsletter that we may issue from time to time; provide our reading webinars, workshops or Comic Book Club to you; make our scrapbooks available to you; and host one of our fundraising events. 	<ol style="list-style-type: none"> Identity Contact 	<ol style="list-style-type: none"> Legitimate Interests (to provide you with our Services).
To receive and process your donations, which includes information relating to your GiftAid declarations, or process your refunds.	<ol style="list-style-type: none"> Identity Contact Financial Transaction Marketing and Communications 	<ol style="list-style-type: none"> Legitimate Interests (to receive your donations for the purposes of our charity).
To manage our relationship with you, including: <ol style="list-style-type: none"> where we notify you about changes to any of our terms, this Privacy Notice, our Volunteer Privacy Policy or any 	<ol style="list-style-type: none"> Identity Contact Marketing and Communication 	<ol style="list-style-type: none"> Necessary to comply with a legal obligation; and Legitimate interests (to keep our records updated and manage our relationship with you).

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<p>other policy in place from time to time; and</p> <p>b) where we respond to your enquiry, request, complaint, or other communication.</p>		
<p>To carry out analysis and research to enable us to manage our charitable organisation effectively and to understand the effectiveness of our literacy programmes, including:</p> <p>(a) to understand the increase, improvement, variance or decrease in literacy rates as a result of our literacy programmes;</p> <p>(b) to identify patterns or themes amongst the children who participate in our reading programmes in respect of literacy levels and their response to our literacy programmes.</p> <p>(c) to analyse and evaluate our literacy programmes through impact and evaluation activities such as interviews, focus groups and case studies which will be used to highlight</p>	<p>(a) Identity (b) Reading Data</p>	<p>(a) Legitimate interests (to study how our charitable reading programmes improve literacy amongst children).</p>
<p>To deliver relevant content and online advertisements on our Site to you and measure or understand the effectiveness of the advertising we serve to you.</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>(a) Where we use cookies or similar technologies to deliver such advertisements to you and measure their effectiveness, consent. In all other cases, legitimate interests (to study how visitors use and engage with our Site, to grow and develop our</p>

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		charity and to inform our marketing strategy).
To carry out market research, including where we ask you to leave a review or otherwise provide feedback to us.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Legitimate interests (to carry out market research and surveys to improve and develop our services to support more children).
To review and understand the impact that our Story Starter Programme or The Story Corner Magazine has had on your child's reading attitude and behaviour (where your child has participated in our Story Starter Programme or The Story Corner Magazine), including by carrying out research through your participation in our Story Starter Programme or The Story Corner Magazine surveys and competitions.	(a) Identity (of you, and your child) (b) Contact (c) Profile (d) Marketing and Communications (e) Special Category Data (of your child)	(a) Explicit consent (having obtained your explicit consent to participate in the Story Starter Programme survey).
To use data analytics to improve our Site, and to measure the effectiveness of our communications and marketing.	(a) Technical (b) Usage	(a) Where we use cookies or similar technologies to undertake such analysis, consent. In all other cases, legitimate interests (for running our charity, provision of administration and IT services, network security and to prevent fraud).
To administer and protect our charitable organisation and our Site, including in relation to: (a) troubleshooting; (b) data analysis; (c) testing; (d) system maintenance; (e) support; (f) reporting; and	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	a) Necessary for our legitimate interests (for running our charity, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise); and

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(g) hosting data).		b) Necessary to comply with a legal obligation.
To send you relevant marketing communications.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	a) Consent (having obtained your consent to receiving direct marketing communications); and b) Legitimate interests where consent is not legally required (to carry out direct marketing and develop our services and grow our organisation and to support more children).

7. 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 or special educational needs.

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.

8. MARKETING

Where you have consented to the same, we will use your personal data to send you updates about our reading programmes and Services, which may include contacting you by email, telephone, and/or post with information, news, and offers on our Services.

The personalisation of advertisements displayed on social media platforms may be based on information you have provided directly to us (for example when browsing our Site) or based on other information attributed to you via cookies, including cookies set by third parties.

Where we are not legally required to rely on your consent, we may send you such updates and in doing so rely on our legitimate interest in using your personal data for marketing purposes (see **How We Use Your Personal Data**, above).

You have the right to opt-out of receiving marketing communications or withdraw your

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consent at any time. Please contact us by email at marketing@bookmarkreading.org to do so. We should be grateful if you would ensure that your emails have "REMOVE FROM MAIL LIST" as the subject line to enable us to process your request as quickly as possible.

Please see below, Disclosures of Your Personal Data, for further information regarding the third parties we share your information with for marketing and advertising purposes.

9. 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 where we need to liaise with a school in relation to your recent attendance at one of our reading programmes;
- third-parties we use to help run and facilitate our literacy programmes and our Site, including:
 - Digital Ocean LLC (**Digital Ocean**), who host our website. Further information regarding Digital Ocean can be found in Digital Ocean's Privacy Policy;
 - Amazon Web Services (**AWS**) host the images and documents on our website. Further information regarding AWS can be found in their Privacy Policy;
 - Future Friendly Ltd (**Kind**), who design and develop our website. Further information regarding Kind can be found in Kind's Privacy Policy;
 - Salesforce Inc (**Salesforce**) is our central CRM system, used to store data on our activities. Further information regarding Salesforce can be found in Salesforce's Privacy Policy;
 - HubSpot Inc (HubSpot) who provide a suite of marketing tools to support the delivery of emails. Further information regarding HubSpot can be found in HubSpot's Privacy Policy;
 - 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;
 - Giving.com Limited (**JustGiving**) who provide fundraising support in the collection of donations. Further information on JustGiving can be found in

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JustGiving'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's Privacy Notice;
- 360 Learning UK Ltd (**360 Learning**), who provide our online learning management system for our online training. Further information regarding 360 Learning can be found in 360 Learning's 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 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.

We may also share your personal data with the third parties listed below. Once we have done so, they will be responsible for ensuring your personal data is processed in compliance with data protection laws, so please make sure you have read their privacy policies (linked to below) carefully:

- advertising and social media platforms (who may process your personal data as joint controllers with Bookmark for these purposes), including:
 - **Google**. Google Privacy Policy;
 - **Facebook**, and **Instagram**. Meta Privacy Policy;
 - **LinkedIn**. LinkedIn Privacy Policy;
 - **X** (formerly known as Twitter). X Privacy Policy,

(together our **Ad Partners**).

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Once we have shared your personal data with our Ad Partners, they are responsible for ensuring your personal data is processed in accordance with data protection laws. Please ensure you review their privacy policies (as set out above) carefully for further information.

Meta

Where you have consented for us to do so, we will collect and share your personal data with Meta Platforms Ireland Limited (**Meta Ireland**) in order to advertise to you via Facebook, and Instagram, and in certain instances we are the joint controller of your personal data with Meta Ireland.

We have entered into an agreement with Meta Ireland to ensure that your information is protected, and the steps we each shall take to comply with data protection laws with regard to the joint processing of your information.

To exercise your rights in relation to your information, Meta Ireland will be your primary contact. Please contact Meta Ireland directly to:

- request access to your personal data;
- request correction of your personal data;
- request erasure of your personal data;
- object to the processing of your personal data;
- request restriction to the processing of your personal data; and/or
- request the transfer of your personal data.

Further information regarding how to exercise your rights, together with the following further information, may be found in Meta Ireland's Privacy Policy and Terms of Service:

- how Meta Ireland processes your personal data in the capacity of a joint controller, including the legal basis that Meta Ireland relies upon for such use;
- how to exercise your data protection rights against Meta Ireland; and
- the name and contact details of Meta Ireland's data protection officer.

10. 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

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Data Retention and Destruction Policy.

11. INTERNATIONAL TRANSFERS

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside of the UK to countries which have laws that do not provide the same level of data protection as UK law.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place:

- we will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data; or
- we may use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection it has in the UK. To obtain a copy of these contractual safeguards, please contact us using the contact details below.

12. 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.

13. 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 your right to object to processing (see below), where we may have processed your personal data unlawfully or where we are required to erase your personal data to

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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 at 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). Please note that where you are an adult seeking to exercise these rights on the behalf of a child, we may ask to see evidence that you are the child's parent or guardian.

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 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.



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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.

14. CONTACT US

If you have any questions about this Privacy Notice 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.

15. AUTOMATED DECISION MAKING

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

16. 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.

17. CHANGES TO THIS POLICY

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

Any changes will be immediately posted on our Site. We recommend that you check this page regularly to keep up to date.