

## PRIVACY POLICY

### Article I. INTRODUCTION

Section 1.01 This privacy notice (**Privacy Policy**) sets out the ways in which we, The Publishers Association Ltd (**we, us, our**), collect and use your personal data (your personal information) in connection with our business. It also explains what rights you have to access or change your personal data

### Article II. ABOUT US

Section 2.01 We are a company registered in England under company number 3282879, with our registered address as set out below.

Section 2.02 You can contact us as follows:

FAO: Director of Operations

Address: First Floor, 50 Southwark Street, London SE1 1UN, UK

Email: [mail@publishers.org.uk](mailto:mail@publishers.org.uk)

### Article III. INFORMATION WE MAY COLLECT ABOUT YOU

Section 3.01 Information that you provide to us

(a) We will collect any information that you provide to us when you:

- (i) are making an enquiry over the phone or our website;
- (ii) subscribe to one of our mailing lists;
- (iii) register to attend an event;
- (iv) to attend a book fair and/or claim a DIT grant (if applicable)
- (v) join as a member;
- (vi) request a listing in our affiliate directory;
- (vii) register to use the Copyright Infringement Portal;
- (viii) submit an application for a job vacancy;
- (ix) order books or other products from our website;

(b) The information you provide to us might include your name, address, email address, phone number, and if you're creating an account you may also provide a password. If you are joining as a member, registering for an event, registering to exhibit at a book fair, requesting a listing in our affiliate directory or ordering books you may also provide your

payment details. If you are submitting a job application you may also provide additional information about your academic and work history, references and any other such similar information as may be supplied.

- (c) If you are attending a book fair overseas, in certain very limited circumstances, we might need to collect sensitive personal data about you. This will depend on where the book fair is held and the extent to which we are involved with facilitating your visit but it could include, for example, health information required for a visa application.
- (d) From time to time we might ask if you would be willing to participate in our surveys; if you agree, we will also collect any information that you provide as part of that survey.

#### Section 3.02 Information we collect about you

- (a) We will collect any information contained in any correspondence between us. For example, if you contact us using a query button on our website or by email or telephone, we will keep a record of that correspondence.
- (b) We will collect information that you upload or post to our website account and/or any correspondence or interactions that you may have with other website account holders.
- (c) We will also collect certain information about how you use our website and the device that you use to access our website. This might include your IP address, geographical location, device information (such as your hardware model, mobile network information, unique device identifiers), browser type, referral source, length of visit to the website, number of page views, the search queries you make on the website and similar information. This information may be collected by a third-party website analytics service provider on our behalf and/or may be collected using cookies. For more information on cookies please read paragraph 6 below.

#### Section 3.03 Information we receive from third parties

- (a) In certain circumstances, we will receive information about you from third parties. For example,
  - (i) if you choose to register for a website user account you may choose to link this account to your social media account (such as Twitter or Facebook). By providing your social media account details you are authorising that third-party provider to share with us certain information about you;
  - (ii) if you are a job applicant we may contact your referees to provide information about you;
- (b) We might also receive information about you from third parties if you have indicated to such third party that you would like to hear from us.

### **Article IV. HOW WE USE INFORMATION ABOUT YOU AND RECIPIENTS OF YOUR INFORMATION**

Section 4.01 We will use your information for the purposes listed below either on the basis of:

- (a) performance of your contract with us and the provision of our services to you;
- (b) your consent (where we request it); or
- (c) our legitimate interests (see paragraph 4.3 below).

Section 4.02 We may use your information for the following purposes:

## to fulfil our obligations to you, including arranging for you to attend one of our events or to exhibit at a book fair;

- (a) to provide you with access to our website in a manner convenient and optimal and with personalised content relevant to you including sharing your information with our website hosts and developers (on the basis of our legitimate interest to ensure our website is presented in an effective and optimal manner);
- (b) to process any job applications you submit to us;
- (c) to keep in contact with you about our news, events, new website features or services or new publications that we believe may interest you, provided that we have the requisite permission to do so;
- (d) to share your information with selected third parties such as partners, to enable them to contact you with information about things that may interest you (where we have your consent to do so);
- (e) to fulfil any orders you place with us and to provide customer service and support (on the basis of our contract with you), deal with enquiries or complaints about the website and share your information with our website developer, IT support provider, payment services provider as necessary to provide customer support (on the basis of our legitimate interest in providing the correct products and services to our website users);
- (f) to carry out aggregated and anonymised research about general engagement with our website (on the basis of our legitimate interest in providing the right kinds of products and services to our website users);
- (g) to protect, investigate, and deter against fraudulent, unauthorised, or illegal activity, including without limitation plagiarism and identity fraud (on the basis of our legitimate interests to operate a safe and lawful business or where we have a legal obligation to do so); and
- (h) to enable us to comply with our policies and procedures and enforce our legal rights, or to protect the rights, property or safety of our employees and share your information with our technical and legal advisors (on the basis of our legitimate interests to operate a safe and lawful business or where we have a legal obligation to do so).

Section 4.03 Where we refer to using your information on the basis of our “legitimate interests”, we mean our legitimate business interests in conducting and managing our business and our relationship with you, including the legitimate interest we have in:

- (a) personalising, enhancing, modifying or otherwise improving the services and/or communications that we provide to you;
- (b) detecting and preventing fraud and operating a safe and lawful business;
- (c) improving security and optimisation of our network, sites and services;

Section 4.04 Where we use your information for our legitimate interests, we make sure that we take into account any potential impact that such use may have on you. Our legitimate interests don’t automatically override yours and we won’t use your information if we believe your interests should override ours unless we have other grounds to do so (such as your consent or a legal obligation). If you have any concerns about our processing please refer to details of “Your Rights” in paragraph 9 below.

#### **Article V. WHO WE MIGHT SHARE YOUR INFORMATION WITH**

Section 5.01 In connection with the purposes and on the lawful grounds described above and in addition to the recipients of your information as described above, we may share your personal information with third parties that we work with such as:

- (a) third parties we work with to deliver our business (including for example, hosting or operating the website and our databases, site analytics, delivery of member benefits, book fairs including exhibition organisers, cleaning and freight forwarders, stand builders, caterers and stand electricians);
- (b) any selected third party that you consent to our sharing your information with for marketing purposes;
- (c) any prospective seller or buyer of such business or assets, only in the event that we decide to sell or buy any business or assets; and
- (d) any other third parties (including legal or other advisors, regulatory authorities, courts and government agencies) where necessary to enable us to enforce our legal rights, or to protect the rights, property or safety of our employees or where such disclosure may be permitted or required by law.

Section 5.02 We require third parties to maintain appropriate security to protect your information from unauthorised access or processing.

#### **Article VI. COOKIES**

Section 6.01 We use cookies to ensure that you get the most out of our website. Cookies are small amounts of information in the form of text files which we store on the device you use to access our website. Cookies allow us to monitor your use of the software and simplify your use of the website. For example, a temporary cookie is also used to keep track of your "session". Without that temporary cookie you would not be able to purchase books via our website.

Section 6.02 If you do not wish for cookies to be installed on your device, you can change the settings on your browser or device to reject cookies. For more information about how to reject cookies using your internet browser settings please consult the “Help” section of your internet browser (or alternatively visit <http://www.aboutcookies.org>). Please note that, if you do set your Internet browser to reject cookies, you may not be able to access all of the functions of the website.

**Section 6.03** Our website may contain content and links to other sites that are operated by third parties that may also operate cookies. We don’t control these third party sites or cookies and this Privacy Notice does not apply to them. Please consult the terms and conditions and Privacy Notice of the relevant third party site to find out how that site collects and uses your information and to establish whether and for what purpose they use cookies.

## **Article VII. HOW WE LOOK AFTER YOUR INFORMATION AND HOW LONG WE KEEP IT FOR**

Section 7.01 We operate a policy of “privacy by design” by looking for opportunities to minimise the amount of personal information we hold about you. We use appropriate technological and operational security measures to protect your information against any unauthorised access or unlawful use, such as:

- (a) ensuring the physical security of our offices;
- (b) ensuring the physical and digital security of our equipment and devices by using appropriate password protection and encryption;
- (c) maintaining a data protection policy for, and delivering data protection training to, our employees;

Section 7.02 limiting access to your personal information to those in our company who need to use it in the course of their work.

Section 7.03 We will retain your information for as long as is necessary to provide you with the services that you have requested from us or for as long as we reasonably require to retain the information for our lawful business purposes, such as for the purposes of exercising our legal rights or where we are permitted to do so for purposes of academic or research purposes. We operate a data retention policy and look to find ways to reduce the amount of information we hold about you and the length of time that we need to keep it. For example,

- (a) we archive our email and paper correspondence regularly and destroy information older than 7 years;
- (b) we retain information relating to orders, refunds and customer queries for approximately 2 years;
- (c) we maintain a suppression list of email addresses of individuals who no longer wish to be contacted by us. So that we can comply with their wishes we must store this information permanently.

## **Article VIII. INTERNATIONAL TRANSFERS OF YOUR INFORMATION**

Section 8.01 Our company is located in the UK.

Section 8.02 Your information will be processed outside of the European Economic Area (EEA) in the circumstances listed below and we will take all steps necessary to ensure that any of your information is adequately protected and processed in accordance with this Privacy Notice, including but not limited to by using all appropriate cross-border transfer solutions such as the European Commission's Standard Contractual Clauses or the EU-US Privacy Shield Framework:

- (a) we supply your name and email address to an emailing service provider in the USA via the EU-US Privacy Shield Framework when we are permitted to send you marketing emails;
- (b) we supply your name, address and email address to an event platform for ticket bookings in the USA via the EU-US Privacy Shield Framework when you book to attend an event;
- (c) we supply your name and email address to a platform for online surveys in the USA via the EU-US Privacy Shield Framework when we are permitted to send you marketing emails;
- (d) we will supply your name, address, contact details and any other information required to fulfil your booking at international book fairs.

## **Article IX. YOUR RIGHTS TO THE INFORMATION WE HOLD ABOUT YOU**

Section 9.01 You have certain rights in respect of the information that we hold about you, including:

- (a) the right to lodge a complaint about us to the UK Information Commissioner's Office (<https://ico.org.uk/>) or the relevant authority in your country of work or residence;
- (b) the right to withdraw your consent for our use of your information in reliance of your consent (refer to paragraph 4 to see when we are relying on your consent), which you can do by contacting us using any of the details at the top of this Privacy Notice;
- (c) the right to object to our using your information on the basis of our legitimate interests (refer to paragraph 4 above to see when we are relying on our legitimate interests); and
- (d) the right to receive a copy of any information we hold about you in connection with the performance of our contract with you or on the basis of your consent (or request that we transfer this to another service provider) in a structured, commonly-used, machine readable format; and
- (e) the right to ask us to limit or cease processing, rectify or erase information we hold about you in certain circumstances.

Section 9.02 Please note that we may need to retain certain information for our own record-keeping and research purposes. We may also need to send you service-related communications

relating to your website user account even when you have requested not to receive marketing communications.

Section 9.03 You may contact us with the details at the top of this Privacy Notice if you wish to action any of these rights and we will comply with your requests unless we have a lawful reason not to do so.

**Article X. CHANGES TO THIS PRIVACY NOTICE**

Section 10.01 We may make changes to this Privacy Notice from time to time. We will post any changes to our site or notify you of any material changes by e-mail.

This Privacy Policy was updated on the 30<sup>th</sup> October 2019