

Read Easy UK Privacy Notice

Appendix G to the Data Protection Policy

Welcome to our Privacy Notice!

Read Easy UK respects your privacy and is committed to protecting your personal data.

This privacy notice will:

- explain how Read Easy UK collects and processes your personal data through your use of this website, post, email, telephone or in person including any data you may provide through this website.
- inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice, together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Background information

Read Easy UK is the 'Controller' responsible for your personal data (and is referred to as "Read Easy", "we", "us" or "our" in this privacy notice).

We have appointed a Data Protection Champion who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Protection Champion using the details set out below.

1. Read Easy UK contact details

Data Protection Compliance

Email address: info@readeasy.org.uk Telephone number: 01386 700883

Website: www.readeasy.org.uk

Postal address: The Old Post Office, Bell Lane, Blockley, Moreton-in-Marsh, Gloucestershire GL56 9BB

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 01/05/2018 and historic versions can be obtained by contacting us.



It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

What you need to know

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- **Identity Data:** includes first name, last name, marital status and title.
- **Contact Data:** includes address, email address and telephone numbers.
- **Financial Data:** includes bank account and payment card details
- **Technical Data:** includes internet protocol (IP) address, your log-in data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data:** includes information about how you use our service.
- **Communications Data:** includes your communication preferences.
- **Special Categories of Data:** includes any information you give us about your health or criminal convictions.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

If you fail to provide personal data

Where we need to collect personal data by law, in order to enable to help you learn to read, allow you to volunteer with us or donate to us and you fail to provide that data when requested, we may not be able to fulfil your request, but we will contact you about this.



3. How your personal data is collected

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

3.1. Direct interactions

You may give us your Identity, Contact and Special Categories of Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- sign up to learn to read;
- sign up to volunteer;
- subscribe to our newsletter;
- request information to be sent to you;
- complete a survey; or
- give us some feedback.

3.2. Automated technologies or interactions

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie information below for further details.

3.3. Third parties or publicly available sources

We may receive personal data about you from various third parties as set out below:

- Technical Data from analytics providers such as Google based outside the EU;
- Identity, Contact and Special Categories of Data from referrers;
- Identity, Contact and Communications Data from online fundraising platforms in relation to donations you have made.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- with your consent;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [contacting us](#).



4.1. 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 plan to use your personal data, and which of the legal bases we rely on to do so depending on why you have contacted us. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Data retention
To register you as a new Reader or Volunteer	(a) Identity (b) Contact (c) Special Categories	(a) Necessary for our legitimate interests (to help people learn to read) (b) Consent	3-4 years after you stop volunteering or reading with us
To help you learn to read	(a) Identity (b) Contact (c) Special Categories	(a) Necessary for our legitimate interests (to help people learn to read) (b) Consent	3-4 years after you stop reading with us
To enable you to volunteer with us	(a) Identity (b) Contact (c) Special Categories	(a) Necessary for our legitimate interests (to help people learn to read) (b) Consent	3-4 years after you stop volunteering with us
To receive donations from you	(a) Identity (b) Contact (c) Financial	(a) Necessary for our legitimate interests (to help people learn to read)	7-8 years after we receive your donation
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (d) Communications	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to keep our records updated and to study how readers find our service)	3-4 years after your last contact with us
To administer and protect our charity and this website (including troubleshooting, data analysis, testing, system	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our charity, provision of administration and IT	3-4 years after the data is collected for this purpose



maintenance, support, reporting and hosting of data)		services, network security and to prevent fraud) (b) Necessary to comply with a legal obligation	
To use data analytics to improve our website.	(a) Technical	Necessary for our legitimate interests (to keep our website updated and relevant, to develop our charity)	3-4 years after the data is collected for this purpose

4.2. Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. Please note that if you disable or refuse cookies some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see below:

Strictly necessary cookies

These are cookies that are required for the operation of our website. They include, for example, cookies that may enable you to log into secure areas of our website.

Analytical/performance cookies

These allow us to recognise and count the number of visitors and see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies

These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Targeting cookies

These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:



Cookie	Name	Purpose
_ga, _gid, _gat, DSID, IDE, _gads, CONSENT, NID	Google Analytics	<p>These are Google Analytics cookies which we use to distinguish users and sessions, follow your journey through our webpages, for demographic and interest reports, to see where visitors came from (e.g. search engine or link), to store the amount of visits and details for each and to find out how long visitors are on the website and bounce rates.</p> <p>We also run Google Ads for readeasy.org.uk using AdSense. These help potential volunteers or readers discover our website by targeting keywords such as 'adult learn to read'. All information is anonymous and we do not collect or store any personally identifiable information using Google Adwords.</p> <p>Further information can be found at Google privacy policy</p>
hj Included InSample	HotJar	<p>These cookies are from HotJar which is a tool that we use occasionally to monitor how users use the Read Easy website, by generating heatmaps and conversion funnels. This helps us understand how users move around the website and therefore helps us to improve usability.</p>
Vuid, vimeo, player	Vimeo	<p>These cookies are for Vimeo which is what we use to host and display videos around the site. These cookies collect viewer statistics, such as how many people have viewed the videos.</p>

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies

Except for essential cookies, all cookies will expire after a maximum of 365 days.

4.3. **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. **Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- The local Read Easy group you are assigned to.



- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to transfer, or merge parts of our business or our assets. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

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.

6. International transfers

Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. 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.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data; the potential risk of harm from unauthorised use or disclosure of your personal data; the purposes for which we process your personal data and whether we can achieve those purposes through other means; and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are set out in the table in paragraph 3 above.

In some circumstances you can ask us to delete your data: see 'request erasure' in paragraph 8 below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.



9. Your legal rights

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority 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.

Under certain circumstances, you have 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 "data 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, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. 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 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 of 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) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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 (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

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 a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.



If you wish to exercise any of the rights set out above, please [contact us](#).

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, repetitive or excessive. Alternatively, we may 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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may 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.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our charity in conducting and managing our charity to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative), and your rights, 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties:

- Service providers acting as processors based in the UK, EU, US and Canada, who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.