



## PRIVACY NOTICE

### 1. INTRODUCTION

- 1.1 This privacy notice sets out the ways in which we, IBRA, collect and use your personal data (your personal information) in connection with our business.

### 2. ABOUT US

- 2.1 The International Bible Reading Association (IBRA) has been in existence for over 130 years and is part of Christian Education. It serves the church in five continents and aims to help Christians around the world to read the Bible daily and with understanding.

Christian Education are a company registered in England under company number 4192501, with our registered address as set out below.

- 2.2 You can contact us as follows:

FAO: Customer Operations Manager

Address: 5-6 Imperial Court  
12 Sovereign Road  
Birmingham  
B30 3FH  
UK

Email: [DataProtection@retoday.org.uk](mailto:DataProtection@retoday.org.uk)

### 3. INFORMATION WE MAY COLLECT ABOUT YOU

- 3.1 Information that you provide to us

3.1.1 We will collect any information that you provide to us when you:

- (a) are making an enquiry over the phone or our website
- (b) subscribe to our mailing lists
- (c) enter into a contract with us
- (d) submit an application to a job vacancy
- (e) order books or other products from our website
- (f) create an account to order books or other products from our website

(g) use any of our other products or services be that voluntary or charged

3.1.2 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 ordering books or services you will 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.

3.1.3 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.

### **3.2 Information we collect about you**

3.2.1 We will collect any information contained in any correspondence between us. For example, if you contact us using our website or by email or telephone, we will keep a record of that correspondence.

3.2.2 We will collect information that you upload or post to your website account and/or any correspondence or interactions that you may have with other website account holders.

3.2.3 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.

### **3.3 Information we receive from third parties**

3.3.1 In certain circumstances, we will receive information about you from third parties. For example:

(a) 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.

(b) If you are a job applicant we may contact your referees to provide information about you.

3.3.2 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.

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

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

4.1.1 performance of your contract with us and the provision of our services to you

4.1.2 your consent (where we request it)

4.1.3 our legitimate interests (see paragraph 4.3 below)

**4.2 We may use your information for the following purposes:**

4.2.1 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).

4.2.2 To administer any publishing contract, including payment of royalties, sharing your information with our system software provider or payment service provider on the basis of performing our contract with you.

4.2.3 To administer orders made from our website and sharing your information with our warehousing and delivery service providers on the basis of performing our contract with you.

4.2.4 To process any job applications you submit to us including sharing this with our third party recruitment agency.

4.2.5 To keep in contact with you about our news, events, new website features or services or new books that we believe may interest you, provided that we have the requisite permission to do so, and sharing your information with our marketing services provider (either on the basis of your consent where we have requested it, or our legitimate interests to provide you with marketing communications where we may lawfully do so).

4.2.6 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, warehouse and delivery service 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).

4.2.7 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.

4.2.8 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.

4.2.9 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.

4.3 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:

- 4.3.1 personalising, enhancing, modifying or otherwise improving the services and/or communications that we provide to you
  - 4.3.2 detecting and preventing fraud and operating a safe and lawful business
  - 4.3.3 improving security and optimisation of our network, sites and services
- 4.4 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.

## 5. **WHO WE MIGHT SHARE YOUR INFORMATION WITH**

- 5.1 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:
- 5.1.1 third parties we work with to deliver our business, including for example, hosting or operating the website and our databases, site analytics, card payment handling providers, providing editorial production services, warehousing and delivery service providers, providing technical assistance and support and providing fraud and plagiarism detection services
  - 5.1.2 any selected third party that you consent to our sharing your information with for marketing purposes
  - 5.1.3 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
  - 5.1.4 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
  - 5.1.5 we require third parties to maintain appropriate security to protect your information from unauthorised access or processing

## 6. **COOKIES**

- 6.1 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.]
- 6.2 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 [www.aboutcookies.org](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.

6.3 The names of the cookies used on our website and the purposes for which these cookies are used are set out in the table below:

Cookie name	Purpose	Duration information held
Google Analytics	Used to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at <a href="http://www.google.com/privacypolicy.html">www.google.com/privacypolicy.html</a>	26 months

6.4 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.

**7. HOW WE LOOK AFTER YOUR INFORMATION AND HOW LONG WE KEEP IT FOR**

7.1 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:

- 7.1.1 ensuring the physical security of our offices, warehouses or other sites
- 7.1.2 ensuring the physical and digital security of our equipment and devices by using appropriate password protection [and encryption]
- 7.1.3 maintaining a data protection policy for, and delivering data protection training to, our employees

7.2 We also Limit access to your personal information to those in our company who need to use it in the course of their work.

7.3 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, literary expression and 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:

- 7.3.1 we archive our email and paper correspondence regularly and destroy information regularly
- 7.3.2 we retain financial information relating orders, refunds and customer queries for approximately seven years

- 7.3.3 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
- 7.3.4 we maintain a list of customers details for approximately five years following any interaction with us other than above in 7.3.2

## 8. INTERNATIONAL TRANSFERS OF YOUR INFORMATION

- 8.1 Our company is located in the UK.
- 8.2 Your information will only be processed outside of the European Economic Area (EEA) in conjunction with our lawful business and will only be done so to fulfil any contract with you
- 8.3 We may supply customer name, contact details and delivery details to our shipping partners when completing orders outside of European Economic Area (EEA)
- 8.4 We will take all steps necessary to ensure that any of your information is adequately protected and processed in accordance with this 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](#):

## 9. YOUR RIGHTS TO THE INFORMATION WE HOLD ABOUT YOU

- 9.1 You have certain rights in respect of the information that we hold about you, including:
  - 9.1.1 the right to ask us not to process your personal data for marketing purposes
  - 9.1.2 the right to request access to the information that we hold about you
  - 9.1.3 in certain circumstances, the right to ask us to stop processing information about you
- 9.2 You may exercise your rights above by contacting us using the details in paragraph 2 of this Privacy notice, or in the case of preventing processing for marketing activities also by checking certain boxes on forms that we use to collect your data to tell us that you don't want to be involved in marketing or by updating your marketing preferences via your account with us.
- 9.3 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.
- 9.4 Note that if you make a request to access information that we hold about you we will not charge you for this. However as per ICO guidelines, we will charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive.

We may also charge a reasonable fee to comply with requests for further copies of the same information. This does not mean that you can charge for all subsequent access requests.

The fee will be based on the administrative cost of providing the information.

- 9.5 From 25 May 2018, in accordance with new data protection laws which will be in force from that date, you will have certain additional rights in respect of the information that we hold about you, including:

- 9.5.1 the right to lodge a complaint about us to the UK Information Commissioner's Office ([ico.org.uk/](http://ico.org.uk/)) or the relevant authority in your country of work or residence
  - 9.5.2 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
  - 9.5.3 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)
  - 9.5.4 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
  - 9.5.5 the right to ask us to limit or cease processing or erase information we hold about you in certain circumstances
- 9.6 You may contact us with the details at the top of this Privacy notice if you wish to action any of these additional rights and we will comply with your requests unless we have a lawful reason not to do so.
10. **CHANGES TO THIS PRIVACY NOTICE**
- 10.1 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 email.

This Privacy notice was updated on 17 April 2018.