

# The Reader Group Privacy Policy

Last updated 2 October 2020

**This privacy policy explains how and why we use your personal information. This means you stay informed and allows us to use your data fairly and lawfully.**

If changes are made to this policy at any time, we'll clearly indicate the date and nature of the change in this document.

This privacy policy applies if you're one of our group members, customers or volunteers or if you use any of our services, visit our website, email, call or write to us.

## Who we are

The Reader Group ('The Reader') is made up of The Reader Organisation (Charity Registration Number 1126806 (SC043054 Scotland) Company Registration Number 06607389) and the Calderstones Mansion House Community Interest Company.

This policy is written in accordance with the General Data Protection Regulation. To update your preferences, review or update your information, submit a request, raise any issues regarding the processing of your personal data or raise any questions, comments, or concerns about the Policy, you should contact the Data Compliance Manager using one of the options below:

Email: [data@thereader.org.uk](mailto:data@thereader.org.uk)

Written enquiries:

Data Compliance Manager, The Reader, Mansion House, Calderstones Park, Liverpool L18 3JB

Telephone: 0151 729 2200

Any concerns can also be lodged with the Information Commissioner's Office, the independent authority set up to uphold information rights in the UK – see the [ICO website](#) for contact details.

## What Personal Data Do We Collect and Process?

We collect and process various types of personal data, for the purposes described below, including:

- Name
- Email address
- Home address
- Phone number
- Biographical information (e.g. date of birth)
- Employment and employer details
- Photographic/media recordings (including CCTV at our Calderstones site)
- Financial information
- IP addresses
- Pages accessed on any of The Reader's websites

We may also collect and process special categories of personal data (previously known as 'sensitive personal data'). Special categories data may include:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Sexual orientation

- Health information

We may collect and process this data in relation to our monitoring, evaluation and research processes, for example when conducting evaluation of participants of our *Shared Reading* groups or other delivered activities. This data is typically provided to us by the individuals themselves; however in some circumstances it may be provided by a third party (e.g. a carer or supervisory staff member in a health or justice setting). Wherever possible we try to collect this data anonymously, so that your identity is not known.

Some identifiable special categories data may be collected in order to protect you, or an individual you refer to our services (e.g. information relating to specific access needs or allergies).

## **Why Do We Collect and Process Personal Data?**

We collect and process personal data for the following purposes:

- To administer our websites;
- To process bookings and purchases;
- To monitor, evaluate and report on the reach and impact of our activities;
- To respond to any communications, queries or requests for information or services from you;
- To keep supporters, volunteers and group members informed of our work;
- For employee and human resources management purposes (as may be required by applicable laws);
- To receive and process financial donations;
- For auditing purposes (as may be required by applicable laws);
- To comply with our legal or regulatory obligations; and
- To establish, exercise or defend legal claims.

The Reader's legal basis to process personal data includes processing that is:

- Necessary for our legitimate interests (for example, to administer our websites, to manage our relationship with you, to provide support for volunteers);
- Necessary in the performance of a contract (for example, to process and manage a magazine subscription or Storybarn booking)
- Necessary in the performance of a public task (for example, to safeguard our group members or perform functions supporting individuals' data rights)
- Necessary to comply with legal requirements (for example, to comply with applicable regulatory obligations and employment law and to make mandatory disclosures to law enforcement); and
- Based on your consent (for example, to send you marketing communications, to conduct research about the impact of our programmes), which may subsequently be withdrawn at any time by editing your preferences or contacting us as specified in the How to Contact Us section of this Policy without affecting the lawfulness of processing based on consent before its withdrawal.

## **How Do We Protect Personal Data?**

Personal data shall be subject to additional safeguards to ensure this data is processed securely. For example, we work hard to ensure data is protected when in transit and storage, that data is pseudonymised or anonymised wherever possible, and that access to this data will be strictly limited to a minimum number of individuals and subject to our Confidentiality Policy.

We will take all reasonable steps to ensure that your data is treated securely and in accordance with this Policy. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to any of our websites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. When possible, encryption is used, both in transit and storage. Access controls within the organisation limit who may access information.

## **Who Do We Share Personal Data With?**

As necessary in connection with the above purposes, your personal data may be collected or processed using software provided by well-recognised third-party service providers (e.g. WordPress.org, Survey Monkey, MailChimp). We rigorously check these software providers before selecting them, reviewing their privacy and security policies. We may also be required to disclose or otherwise process your personal data in the context of any regulatory audit to which we may be subject from time to time. By submitting your personal data, you agree to this transfer, storage and processing.

Any other instances of sharing personal data outside The Reader will be identified at the point of data collection or (for previously collected data) prior to sharing and, where appropriate, consent will be obtained. Data may be shared for activities in connection with our mission including publicity, for research purposes or in order to link up individuals to new, existing or emerging Reader Communities. Data Sharing Agreements will be put in place with all third parties prior to transfer of data, limiting usage of shared data to those purposes specified by The Reader, in line with our privacy statements and privacy protocols.

Some of these authorised third parties may be located outside the United Kingdom ("UK") or European Economic Area ("EEA"). We take appropriate steps to ensure that recipients of personal data from us are bound to duties of confidentiality, where relevant or appropriate. Where this is not possible, we rely on the selection of trusted companies with privacy policies and auditable processes, and seek to ensure that there are adequate safeguards in place for protecting transferred data.

## **How Long Do We Keep Personal Data?**

We ensure that personal data is retained only for as long as necessary in accordance with the above purposes and applicable laws. We may be required to retain your personal data for a number of years in order to satisfy legal or contractual obligations, or in order to establish, exercise or defend legal claims. When your personal data is no longer necessary for these purposes, the personal data will be securely deleted.

Typically, we retain personal data for two years following your last interaction with us, or seven years where your interaction involved a financial transaction. A full explanation can be found in our Archive Retention Policy.

## **Communications**

### **Emails and mailing lists**

Messages received through the Contact Us section of the website or [info@thereader.org.uk](mailto:info@thereader.org.uk) are reviewed by one staff member and sent onwards when necessary to other staff members. Similarly, emails sent to our other general addresses, for example [volunteer@thereader.org.uk](mailto:volunteer@thereader.org.uk), are reviewed and passed on only

when necessary. We use our best efforts to prevent disclosure of the names of senders to others outside of The Reader, i.e. third parties, without your permission, consistent with our legal obligations.

We use email service providers in the UK. Our current service provider is [Microsoft](#).

We administer a mailing service ([Mailchimp](#)) for notifications by email based on interest in topics that you have explicitly indicated to us or that are relevant in relation to your relationship with us (e.g. e-newsletters, event invitations). You have the opportunity to unsubscribe from these communications at any time.

## Postal correspondence

Information we receive by post to our general address is collected by one staff member, reviewed, and sent onwards when necessary to other staff members.

We share magazine subscribers' postal addresses with Buxton Press, who process magazine postage on our behalf.

## Telephone Communications

Telephone calls made to and from on our main landline number and subsequent extensions are processed by Virgin Media using SIP Trunking services. As a result, traffic data for calls may be retained by Virgin Media in accordance with various laws and with the requirements of the services provided. Telephone calls and SMS ('texts') made to and from our business mobile phones are processed by EE. Traffic data for these calls and texts may be retained by EE in accordance with various laws and the requirements of the services provided. Additionally, traffic data held locally on business handsets (call logs, texts, etc.) may be retained by The Reader in accordance with business requirements, and subject to the conditions of the Data Usage and stored in accordance with Privacy policies may be found [here for Virgin Media](#) and [here for EE](#).

We use an automated text message service for some key communications (e.g. event reminders, urgent alerts). Automated SMS communications are processed through [Twilio](#).

## Website

We design and administer our web services to limit the amount of data collected.

It is helpful to The Reader to know how our website is used. This takes place in two ways, and each involves the use of analytics and data from user behaviour.

1. **We collect data on the usefulness of our site's content.** This is to help us identify to ourselves and communicate to others, including our Board and our funders, how useful our website content is. This collection commonly comes in the form of identifying how many downloads there have been of a specific report or document, or how many views of a video (and deciding what percentage of a video download qualifies as a 'view'), and if available, the geographic distribution of the viewings.
2. **We collect data on how people use our sites.** This is to help us design our work and our websites and to make sure our volunteers are receiving the support they need. This involves monitoring the journeys people take on our website - i.e. from where they enter, what areas and items they visit and download in the process of using the site, and from where they leave.

To undertake analysis of how our site is used, we use two processes.

1. **We administer our own website administration platform**, using [Wordpress](#). Wordpress will process some user activity, including IP address data and user-entered search queries. Our webserver also processes and logs HTTP requests, HTTP errors, PHP errors and TLS Handshakes (this list isn't exhaustive).
2. **We administer our own analytics platform**, using [Google Analytics](#). Google Analytics generates data by using JavaScript on users' browsers to track sessions.

We keep the aggregate and inferred data indefinitely, and use this aggregate data to report internally, to our Board, and to our funders. For instance, we will report to our Board that a website article was downloaded X number of times and reached people in Y countries. We will use usage data from our Online Community Hub to identify if there are volunteers who may require extra support to engage with our services.

### **Third party cookies**

We may point from our websites to other internet services that do use cookies. Our payment processors, for example, will place cookies as well. This is also the case with multi-media services, and with the links that we post on our Twitter and Facebook accounts.

### **Social Media**

We use social media and social networking services to advance our work. These applications require the use of third party service providers. Notably, we have a [Facebook](#) page, [Twitter](#) feed, [Linkedin](#) account, [Instagram](#) feed and a [YouTube](#) channel.

We use direct messaging over social media on occasion, when individuals and organisations contact us on Facebook by leaving messages in our Inbox or by sending us Direct Messages on Twitter. We do not export information about our followers from any social media platforms.

## **Financial and Supporter Information**

### **Online Ticket Purchases**

The Reader uses Monad to sell tickets and other products online. We will use the personal data you provide during the booking process to email your booking confirmation, contact you in the event of a change to your booked session, and to confirm your identity at your booked event. Failure to provide this information will mean we are unable to process your booking. We will also send you a short post-visit email so you can tell us what you thought of your booked activity. Paypal will share with us basic information about your purchase, in line with their privacy policy. We'll keep your purchase data for seven years after the point of transaction. We won't share your personal data with any third parties unless you specifically opt-in to hear from partners hosting these ticketed events. We may send you communications about similar products – you'll have the opportunity at the point of purchase to indicate if you'd rather not receive these.

If an online purchase is cancelled by us, or by you we will contact you to process your refund, where applicable. In this communication we may offer you the option to donate your refund to The Reader.

We'll also use anonymised information about your booking (e.g. date, number in party, ages, postcode) to report on and understand the reach of the ticketed event.

### **Donations**

We collect and process data provided by prospective and current donors. This data may include contact details, biographical information, financial information and donation history. We do not purchase or sell

such data, so we only collect data given to us by the individuals or organisations themselves and from information that is readily available through public means. This information will be recorded on our CRM system, which is hosted by Microsoft 365.

We hold Paypal, Virgin Giving, and JustGiving accounts to administer online donations. Paypal allows you to close your customer account once you no longer require it. Your account information may stay active with PayPal for legal and audit purposes, in accordance with PayPal's privacy policy available [here](#). Virgin Giving and JustGiving have similar policies; please refer to their privacy policies available [here](#) and [here](#) for more detail. Regular Direct Debit donations are processed using GoCardless, who will share with us basic information about your donation in line with their [privacy policy](#).

Our financial accounts for donations are held with Santander. Any donations made to The Reader Organisation will be processed by Santander in accordance with its **privacy policy available here** and under UK law. We retain information about all donations in accordance with financial auditing requirements, being a period of 6 years retention from the end of the financial year in which they relate.

We will ask donors wishing to make a donation under the Gift Aid scheme to complete a Gift Aid declaration form. We are required to store an auditable record of those donors -- full name, home address and details of the donation -- in order to process the Gift Aid donation. To make a Gift Aid repayment claim, we are required to share that data with the UK Government -- HMRC's Gift Aid service, Charities Online. Please contact [info@thereader.org.uk](mailto:info@thereader.org.uk) for further information on making a Gift Aid donation.

## **Subscriptions (Reader Friend, Friend+ The Reader magazine)**

We collect data about subscribers either at the point of purchase on our website (via Monad, our online purchasing software), or via paper forms. This information includes your address, to post items relating to your subscription to you, and an email address and/or telephone number, to allow us to address any queries around returned mailings or cancelled subscriptions. At the end of your subscription we'll send you a letter or email notifying you that your subscription is coming to an end, giving you the opportunity to re-subscribe. We may also send you communications about similar products (for example, for magazine subscribers, other publications from The Reader) – you'll have the opportunity at the point of purchase to indicate if you'd rather not receive these.

Occasionally we offer new and returning subscribers the opportunity to nominate a contact, friend or family member to receive a free taster copy of The Reader magazine. Data received for nominees will include a name and address for postage; we'll notify the nominated recipient and send on their taster copy within a month of receiving the nomination. This information will be stored on our databases for a maximum of two years following the delivery of the taster copy, unless within this time the recipient chooses to subscribe to the magazine themselves or engage with us in another way.

Subscriptions can be purchased either by cheque, Paypal (fixed-duration subscriptions) or GoCardless (Direct Debit) – these companies will share with us basic information about your transaction with them in line with their respective privacy policies.

Occasionally we send complimentary copies of The Reader magazine to funders or other relevant stakeholders. We record who these copies have been distributed to through our online purchasing tool and share address details with Buxton Press, our magazine fulfilment partner. Should you wish to stop receiving complimentary copies, or believe you are receiving them in error, please contact [magazine@thereader.org.uk](mailto:magazine@thereader.org.uk).

Magazines are sent to subscribers through Buxton Press.

Subscribers can contact [magazine@thereader.org.uk](mailto:magazine@thereader.org.uk) (for magazine subscriptions) or [friends@thereader.org.uk](mailto:friends@thereader.org.uk) (for all other subscriptions) to request amendment of any personal data that we hold in relation to their subscription.

## **Hiring a space or booking a function at Calderstones**

If you enquire about tenancies, functions or room bookings at Calderstones we'll keep a record of your email and telephone communications with us on our CRM system. The Reader will use the personal data you provide to respond to your enquiry, email your booking confirmation, contact you in the event of a change to your booking and track payments and invoices. Failure to provide this information will mean we are unable to process your booking. Relevant contact and customer information will be made available to the staff hosting you on the day through our site management platform hosted by YesPlan. We may send you communications about similar products (for example, new function packages hosted by The Reader or special offers on room bookings) – you'll have the opportunity at the point of enquiry or purchase to indicate if you'd rather not receive these. We will also send you a short post-visit email through [Survey Monkey](#) so you can tell us about your experience of Calderstones.

If you hire a space at Calderstones to deliver an activity as part of The Reader's Programme, you'll receive an automated email or SMS message with a link to a short survey following every scheduled session. You'll receive a further reminder message if the survey is not completed. You may receive periodic communications about other Reader at Calderstones evaluation activities we'd like your support with. These expectations will be clearly laid out in your Hire Agreement with us.

## **Visitors to Calderstones**

### **CCTV**

The Reader uses CCTV to make sure all our visitors, volunteers and staff are safe while spending time at Calderstones. By having CCTV cameras active we can reduce the likelihood of anti-social or criminal activities and investigate any issues that arise. Footage is deleted after 14 days and access is limited to a small number of operational staff. All requests to access recorded footage are vetted and logged by our Data Compliance Manager.

## **Volunteers**

### **Volunteer applications**

We process volunteer enquiries through our website. When you enquire about becoming a volunteer we'll add your details to our computer systems so that we can keep track of our communications with you (including emails and telephone calls). We'll notify you of opportunities in your region and – where appropriate – send you an application form to complete. We will use the data provided on your application form to assess your suitability for our volunteering roles. If your application is successful, we'll use your contact details to notify you of your application outcome and to send pre-course information relating to your training. We'll also email you a starter survey so we can understand who volunteers with us and why.

If your application is unsuccessful, we will use your contact details to notify you of the decision and to signpost you to other ways in which you can get involved with The Reader. A record of your application will be stored on our contacts and volunteer databases for six years.

If you will be volunteering directly with The Reader we will use the contact details you provide to request a reference from a referee. We will notify your referee of your name and identify your relationship to them but would not share your contact details with them. We will keep details of referees of successful applicants on the applicant's volunteer record (retained for six years following the end of volunteering placement); unsuccessful applicants' referees' data will be deleted after six months. We keep all DBS application forms on secure systems and on completion of the DBS check we delete copies of all identity documents provided to support the application.

If you will be volunteering with us through a partner organisation we may contact that organisation periodically to check that your safeguarding training is up to date and that you are still actively engaging with them.

## **All volunteers**

When you become a volunteer with us, we'll give you login details for our Online Community Hub. From here you'll be able to view the basic contact information we hold on you and to update it if your details change.

Your details will be stored on our contacts and volunteer databases so that we can track our communications with you and get in touch about information relevant to your role and region, including job opportunities you may wish to apply for at The Reader. This information will become part of your personal file and retained until six years following the end of your time volunteering with us.

If you run events for The Reader you'll receive an automated email or SMS message with a link to a short survey following every scheduled session. You'll receive an automated reminder message if the survey is not completed. We'll keep a record of all records and expense claims you submit.

Volunteers will periodically receive updates from us via automated email or SMS message.

Comments posted on the Online Community Hub forum will be visible to all Hub users.

## **Volunteers managed by a Hub Organiser**

We'll share your contact details, training dates, attendance outcomes and administrative information regarding your ongoing engagement with The Reader with your Hub Organiser. Where your Organiser works for a partner organisation and uses an email address other than one ending '@thereader.org.uk' we'll let you know. Your contact details will only be used by your Organiser for matters relating to your work with The Reader.

If your project is managed by a Shared Reading Organiser, they will be able to log onto the Online Community Hub to see what records you've submitted.

## **Volunteer expenses**

Volunteer expenses are processed through our Online Community Hub and Survey Monkey. Submitted expenses will be logged on our CRM system and entered weekly into Sage, our accounting software. If you submit an expenses claim but we don't hold bank details for you, you'll receive an automated email

prompting you to send this information to our Accounts team, who will record this information within Sage. We keep records of all financial transactions for seven years.

## **Volunteers at Calderstones**

Our access fobs are individually identifiable. Fob access data is not routinely monitored by Reader staff but may be reviewed if a fob has been misplaced or we have concerns about site access.

Please see the section on Visitors to Calderstones for information about how we use CCTV.

## **Staff**

### **Applicants**

We'll use your application form to assess your suitability for the position or role applied for. At the point you apply you'll be requested to complete an anonymous Equality and Diversity survey, which is handled separately from your application. If your application is successful, personal information from your application form is entered onto our CRM system and retained for a period of six years after the end of the employment or volunteering. If not successful, all manual and electronic records relating to the application are deleted after a period of six months.

For applicants who enter our talent bank, we will ask you if you are happy for us to retain your details and to be contacted if a suitable position becomes available. We retain this information on secure systems and will contact you periodically to ask if you still wish to be in our talent bank and for us to retain your details.

We keep all DBS application forms on secure systems and on completion of the DBS check we delete copies of all identity documents provided to support the application.

### **Employees of The Reader Group**

Your personal contact details and record of contracts of employment will be kept on our CRM system and in your personal file and are accessible only to members of the HR Team.

Staff visiting or working at Calderstones should be advised that access fobs and printer cards are individually identifiable. Fob access data is not routinely monitored but may be reviewed if a fob has been misplaced or we have concerns about site access. Please see the section on Visitors to Calderstones for information about how we use CCTV.

## **Monitoring, Evaluation and Research**

### **Evaluation**

We collect and process data for monitoring, evaluation and research purposes, for example when evaluating the reach of our programmes and their impact. This data may be provided to us by the individuals themselves or from third parties (e.g. member of staff in a care home). We only collect identifiable personal data when it is necessary to the evaluation (for example, when we need to compare individuals' responses across their time volunteering or reading with us). In these circumstances, we would always pseudonymise your identity on our systems.

Some of our evaluation data is processed using [Survey Monkey](#). We regularly download to our systems the data submitted online and erase it from Survey Monkey.

Where research is conducted in collaboration with a third party research body we will ensure research ethics procedures are followed and all reasonable steps are taken to ensure specific informed consent is secured (where relevant) from all data subjects.

If you are an external researcher or journalist, The Reader will ask you to submit a proposal to [research@thereader.org.uk](mailto:research@thereader.org.uk). The Reader will use the data you provide to assess and contact you about the outcome of your proposal. If your proposal is unsuccessful, we'll retain your details in our inbox for six months from the point of application. If your proposal is accepted, your contact details will be recorded on our internal contacts system and retained for two years following the end of your engagement with us. Where proposals include details of a research supervisor we will include them in any follow-up email correspondence and may phone them to discuss your project.

## Reading Session Data

In some of our groups we use group members' full names to record which sessions our members attend in order to analyse and understand attendance, recruitment and retention patterns. This information is stored on our CRM system and processed using Microsoft Excel; access is limited to relevant staff members only.

## Your Data Subject Rights

You are entitled, in accordance with the General Data Protection Regulation (GDPR), to request access to, rectification of, or erasure of your personal data. You are also entitled to request restriction of or object to collection and/or processing of personal data, to request data portability and hold rights relating to automated decision making and profiling.

We will provide you with a response to your requests in accordance with UK data protection law. Requests can be submitted at any time by email to [data@thereader.org.uk](mailto:data@thereader.org.uk), or by post to the address set out below. If our processing of your personal data is covered by EU law, you may also lodge a complaint with the corresponding data protection supervisory authority in your country of residence. You can find the relevant supervisory authority name and contact details **here**. In the UK the relevant supervisory authority is the UK Information Commissioner, more information is available **here**.

## How to Contact Us

Please read the Policy carefully. To update your preferences, review or update your information, submit a request, raise any issues regarding the processing of your personal data or raise any questions, comments, or concerns about the Policy, you may contact us by writing to The Data Compliance Manager, The Mansion House, Calderstones Park, Liverpool L18 3JB, by phoning 0151 729 2200 or emailing [data@thereader.org.uk](mailto:data@thereader.org.uk)

## Changes to the Policy

In the event that the Policy is changed at any time, the date and nature of the change will be clearly indicated in this document. In the event that the change has a material impact on the handling of your personal information, we will contact you to you to inform you of the changes and where appropriate seek your consent.

## **Revisions**

2 October 2020 – Updated to reflect The Reader’s new integrated systems including changes to our refund process and data processing and software used for payments, automated messages and other interactions with volunteers, customers and other stakeholders

Oct 2018 – Privacy Policy instituted and made available online.