

The Reader Group Privacy Policy

Last updated 11 April 2023

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, volunteers or employees 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 (SCO43054 Scotland) Company Registration Number 06607389) and the Calderstones Mansion House Community Interest Company.

This policy is written in accordance with the UK General Data Protection Regulation (UK GDPR). 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

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. In such circumstances, this information is not considered personal data.

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 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 being moved between locations or computer systems and in 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 sent or received from 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 when moving your personal data between locations or computer systems and in 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, participation in data sharing initiatives as required by our funders, or in order to link up individuals to new, existing or emerging Reader Communities. At every stage, we look at how to limit the amount of data we share to only what is necessary, and use pseudonymisation or anonymisation wherever we can. 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 are reviewed by one team and sent onwards when necessary to other staff members. Similarly, emails sent to our other general addresses, for example 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 team, reviewed, and sent onwards when necessary to other staff members.

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 may 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 gathered from how visitors use our website.

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 if available, the geographic distribution of these interactions.
2. **We collect data on how people use our sites.** This is to help us design our work and our websites. 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. For our Online Community Hub, this can include understanding how and when individual users interact with the site, so that we can make sure volunteers are receiving the support they need.

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. Our cookie policies are managed through Cookieyes.

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 read feedback that comes back to us through public review sites such as TripAdvisor and Google My Business and may keep records of submitted comments to help us improve our work.

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. You can choose whether to complete the transaction using Paypal or Stripe, who 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.

Illuminate is an Audience Data Platform for arts and cultural organisations, commissioned by Arts Council England and built and developed by PricewaterhouseCoopers (PwC) that helps organisations like The Reader to better understand their audiences. We will share customer data with the Illuminate platform for any purchasers from 1 April 2023 onwards. This will be shared with PwC via our Monad ticketing system or uploaded direct to the portal. The information we share will be combined with ticketing information from other arts organisations across England and Wales to better understand our audiences at a regional and national level, in line with our funding requirements as an Arts Council England National Portfolio Organisation (legitimate interests). All personal data is pseudonymised upon receipt and prior to storage by PwC.

We won't share your personal data with any other third parties unless you specifically opt-in to hear from partners involved in 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 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, Stripe/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](#). JustGiving and Stripe have similar policies; please refer to their privacy policies available [here](#) and [here](#) for more detail. Regular Direct Debit and other donations are processed using GoCardless, who will share with us basic information about your donation in line with their [privacy policy](#). Donations made through GoodBox do not involve the sharing of any personal data with The Reader – see details [here](#).

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 for further information on making a Gift Aid donation.

Subscriptions

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 contact you – by phone, email or post - notifying you that your subscription is coming to an end, giving you the opportunity to re-subscribe and give any feedback about your subscription. We will contact current subscribers periodically to collect feedback on our products. We may also 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.

Subscriptions can be purchased either by cheque, Paypal/Stripe (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.

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 may 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 a link to a short survey for completing following every scheduled session. 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 automatically deleted after 25 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 be asked to submit regular activity logs of the sessions you deliver. We'll keep a record of all records and expense claims you submit.

Volunteers may 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 other Volunteers

We'll share your contact details, training dates, attendance outcomes and administrative information regarding your ongoing engagement with The Reader with the volunteer who manages you. Where this volunteer 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 them for matters relating to your work with The Reader.

If your project is managed by a volunteer, 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.

External Partners

We gather all or some of the following information about people working at partner organisations, or other stakeholders who are involved with or have an interest in working with us:- Name, job title, organisation, e-mail address, postal address, and contact numbers. We access data which is in the public domain, as well as collect data through various networking activities and partner contacts. We also collect information that is available in the public domain as part of our prospecting process to identify and profile organisations where we may want to build future relationships. Information about current and prospective partners or other stakeholders is stored within our password protected CRM (Microsoft Dynamics). We also keep a record of our interactions with you and any interests relevant to your role. This data helps us to coordinate our activities, identify new opportunities and notify relevant parties of ways to get involved. If your partner details require updating or our communications with you no longer feel relevant, please get in touch with us directly so we can amend our records.

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 relevant members of the People 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.

As an employee you will be asked to use other people management/collaboration software that requires the processing of your personal data (e.g. Officevibe, WhosOff). The personal data submitted is kept to a minimum and staff access limited to those who need to see it. Privacy policies for these tools can be found online; for information about how The Reader uses these, please talk to a member of the People Team.

We may contact past employees if suitable opportunities for involvement arise in the future, and may invite you to become part of our alumni network. If you would prefer not be contacted about such matters after leaving employment with us, please let us know.

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.

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 UK General Data Protection Regulation (UK 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, 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

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

11 April 2023 – Change to Arts Council England partner for ticketing insights sharing. Subscriptions updated to reflect changes in offered packages.

30 August 2022 – Updates to section covering contacting existing and expiring subscriptions; removal of Reader Friend + product type.

8 June 2022 – References to GDPR updated to UK GDPR; clarification that the policy covers employees of The Reader and further detail provided about employee-specific practices; updated information around users/teams with access to information; removal of outdated information concerning automated messages; inclusion of Stripe and GoodBox payment methods and removal of Virgin Giving; new information regarding use of online review data and usage of the Online Community Hub; detail provided of cookie management system; updated retention period for CCTV footage; new section added around existing and prospective partners; change of terminology relating to volunteers managing other volunteers.

21 June 2021 – Update to the Online Ticket Purchases section to reflect new data sharing arrangement with The Audience Agency; change of terminology around Strategic Leads.

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.