

## **PRIVACY POLICY**

Last updated 22 May, 2018

Welcome to the privacy policy of Walker Books Limited. We respect your privacy and are committed to protecting your personal data. This privacy policy is intended to inform you as to how we protect and use your personal information and to tell you about your privacy rights and how the law protects you.

We endeavour at all times to comply with the EU General Data Protection Regulation and other relevant legislation. This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy [here](#)

- 1. IMPORTANT INFORMATION AND WHO WE ARE**
- 2. DATA WE COLLECT AND HOW WE COLLECT IT**
- 3. COOKIES**
- 4. HOW WE USE YOUR PERSONAL DATA**
- 5. CHILDREN'S INFORMATION**
- 6. DISCLOSURES OF YOUR PERSONAL DATA**
- 7. YOUR LEGAL RIGHTS**
- 8. INTERNATIONAL TRANSFERS**
- 9. DATA SECURITY**
- 10. DATA RETENTION**
- 11. LINKS TO OTHER WEBSITES**
- 12. CHANGES TO OUR PRIVACY POLICY**

- 1. IMPORTANT INFORMATION AND WHO WE ARE**

### **Purpose of this Privacy Policy**

This privacy policy aims to give you information on how we, Walker Books Limited, collect and process your personal data through the use of this website when you sign up to a newsletter or take part in a competition, or when you provide us with data over the telephone, via post or mail or in any other way such as when you meet one of us in person.

### **Controller**

Walker Books Limited (referred to as “Walker”, “we”, “us” or “our”) is the controller and responsible for your data.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this policy, please contact the data privacy manager using the details set out below.

### **Contact details**

Full name of legal entity: Walker Books Limited

Registered Number: 1378601

ICO Registration Number: Z4878701

VAT Number: GB235379449

Registered and postal address: 87 Vauxhall Walk, London SE11 5HJ

Telephone Number: 020 7793 0909

Email address for our Data Privacy Manager: [privacy@walker.co.uk](mailto:privacy@walker.co.uk)

Email address for any marketing enquiries: [marketing@walker.co.uk](mailto:marketing@walker.co.uk)

## **2. DATA WE COLLECT AND HOW WE COLLECT IT**

The data we collect about you is data you provide us with. You might give it to us in person, for example, at a book fair or conference, you may provide it by post or email when applying for a job, or enquiring about one of our services – or perhaps you are signing up to one of our newsletters. In addition, of course, there is data that is provided in connection with our publishing activities – authors and illustrators entering into negotiations and subsequent contracts will be exchanging information with us, much of which will inevitably involve personal data. What we do not do is purchase data from third parties.

The types of data we collect may include:

- Contact information, such as your name, postal address, email address and telephone number
- Date of birth and gender
- Employment information, such as work experience
- Biographical information
- Bank details

Please ensure you do not send us any content that includes personal data about anyone else without first getting their permission to do so.

## **3. COOKIES**

Cookies are small pieces of information that are stored by your browser on your computer's hard drive. Our cookies do not include any personally identifying information. Most web browsers automatically accept cookies but you can change your browser to prevent that. For more information visit our cookie policy [link].

## **4. HOW WE USE YOUR PERSONAL DATA**

We may use the personal information we collect from you to:

- Offer and provide services and information, including newsletters and other direct marketing where we have your consent or other lawful basis for doing so
- Run prize draws, competitions and promotions

- Permit you to participate in blogs, forums and discussion groups, but encourage you not to share personal information – we are not responsible for any information you choose to voluntarily provide in such public forums
- Display content on our website such as book reviews
- Respond to any communications you may send us
- Enforce usage terms, for example by blocking inappropriate usage of the website

We rely on the following lawful bases to handle and use your personal data:

- Where necessary for the performance of a contract – for example, when we need to use your personal data in order to fulfil the terms of a contract, such as a publishing agreement or contract of employment, or to provide services you have requested from us, including fulfilling entry to a prize draw
- Consent – to share your information with third parties such as authors, co-publishers or marketing partners so they can contact you, or, for example, for us to send newsletters that you have actively signed up to receive
- Legal obligation – there will be circumstances in which we are required by law to retain your personal information
- Legitimate interests (making sure we balance our interests with yours) - for example, when we engage in marketing and sales activities with other businesses, or to respond to queries, correspondence or process job applications

## **5. CHILDREN'S INFORMATION**

If you are under 13, you should ask your parent, legal guardian or another appropriate adult to provide their details, not yours, if you want to receive newsletters, which will be sent to that adult's address for them to share with you. The same applies if you want to enter one of our prize draws – and, in some instances such as prize draws run via social media networks, the age restriction may differ. This will be made clear to you in the terms and conditions of entry.

## **6. DISCLOSURES OF YOUR PERSONAL DATA**

We are the parent company of the Walker Group and may share information with other companies in the group, for example in order to fulfil publishing agreements. Our companies include Walker Productions Limited in the UK, Candlewick Press Inc in the USA and Walker Australia.

Your data may be shared with our publishing partners, for example publishers of foreign editions of our books, co-promoters of prize draws or partners in marketing campaigns.

Your data may be shared with companies which administer our customer databases and distribute e-mails on our behalf.

If we buy or sell any business or assets, we may disclose your information to the buyer or seller of such business or assets.

There may be instances when we are under a duty to disclose or share your data in order to comply with any legal obligations or to enforce the terms of any contract or agreement we have with you, or to protect our rights, property or safety or that of our clients, employees or other parties.

In all instances of sharing data, strict security procedures are in place together with appropriate agreements.

## **7. YOUR LEGAL RIGHTS**

Under the EU General Data Protection Regulation, you have a number of rights which (subject to certain exemptions under the law) we will uphold. To exercise any of these rights please contact us:

### **Contact details**

Full name of legal entity: Walker Books Limited

Registered Number: 1378601

ICO Registration Number: Z4878701

VAT Number: GB235379449

Registered and postal address: 87 Vauxhall Walk, London SE11 5HJ

Telephone Number: 020 7793 0909

Email address for our Data Privacy Manager: [privacy@walker.co.uk](mailto:privacy@walker.co.uk)

Email address for any marketing enquiries: [marketing@walker.co.uk](mailto:marketing@walker.co.uk)

The rights you have in relation to the personal information we hold about you are:

**Access to your data:** you have the right to request us to provide you with the personal data we hold about you, and to provide the purpose for which we are using it. On receipt of such a request we will endeavour to respond to you as soon as possible, but at least within one calendar month. To help protect your privacy and maintain security we may take steps to verify your identity before providing any information.

**Withdrawal of consent:** if we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time). Each newsletter you receive from us will include the option to unsubscribe, or you can contact us directly to request that we remove you from the list of recipients.

**Rectification:** you can ask us to amend any personal data that may be incorrect, or which might require updating – this is helpful in ensuring our records are accurate and up-to-date.

**Erasure:** you can ask for your personal data to be deleted. We will assess any deletion request on a case by case basis and respond to you within one calendar month.

**Restrict processing:** you can ask us to ‘block’ or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information.

Data portability: with effect from 25 May, 2018 you have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

To object: you can ask us to stop processing your personal information, and we will do so if we are relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling grounds for the processing; or processing your personal information for direct marketing.

Whilst you do 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](http://www.ico.org.uk)) we do hope that you will contact us first as we would appreciate the chance to deal with your concerns and resolve any issues you might have.

## **8. INTERNATIONAL TRANSFERS**

Some of the companies we share data with, including companies within the Walker group, are based outside the European Economic Area ("EEA"), so their processing of your data will involve a transfer of data outside the EEA. Whenever we transfer your personal data outside the EEA, we ensure the appropriate protection is in place, including strict security measures and contractual agreements.

## **9. DATA SECURITY**

We endeavour to take all steps necessary to ensure your data is treated in accordance with this privacy policy and is stored on secure servers with appropriate technical and organisational measures in place. Our systems are password protected and encrypted.

Unfortunately, transmission of information over the internet is not completely secure. Whilst we do our best to protect your personal data, we cannot guarantee the security of data transmitted to our site.

## **10. 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, we consider the amount, nature and sensitivity of the personal data, the harm from unauthorised use or disclosure, the purposes for which we process the data and whether we can achieve those purposes through other means, and the applicable legal requirements. To give you examples, with data collected for a prize draw, once the prizes have successfully been allocated, we no longer have any need for the data, so it will be deleted. Where we have on-going contractual relationships, such as a publishing agreement in place, clearly we will hold data for as long as the contract requires. In other instances, such as financial details, the length of retention will be in line with statutory requirements.

## **11. LINKS TO OTHER WEBSITES**

Our websites may contain links to other third party websites. Please remember that once you click on an external link this privacy policy will no longer apply and you should read the privacy

statements on those sites. Examples of external links on this site are the links used to enable users to log in to create an Agent Profile that appear at the top of all the pages of the Alex Rider site. Using these links will take you from our site to the SuperAwesome Club and our privacy policy will no longer apply. You should therefore refer to SuperAwesome's privacy policy to find out how they collect and use your data.

## **12. CHANGES TO OUR PRIVACY POLICY**

This privacy policy was updated in May 2018. It may be subject to further changes in the future so we encourage you to refer back to this page for the latest version.