



**FERNHURST BOOKS LIMITED  
DATA PRIVACY POLICY**

**1. About This Policy**

- 1.1 This policy explains the personal data we hold about our customers, website visitors, authors, business partners, employees and shareholders: how we use it; how we keep it safe and what your rights are in relation to it. It applies when we are acting as a data controller of the personal data of such people.
- 1.2 We may amend this Data Privacy Policy from time to time without giving advanced notice. Please check our website ([www.fernhurstbooks.com](http://www.fernhurstbooks.com)) for any amendments.
- 1.3 We are Fernhurst Books Limited (contact details in Section 6).
- 1.4 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.

**2. The Personal Data We Collect, Why & How We Will Use It**

PERSONAL DATA	WHY & HOW USED	LAWFUL BASIS FOR PROCESSING
<b>Customers</b> <u>Personal &amp; Employees /</u> <u>Representatives of Trade Customers</u> Name Address Telephone number(s) E-mail address(es) Books ordered Credit card details (personal only) Bank account details (personal only) Mailing preferences Correspondence	To process orders	Performing our contract with the customer
	To provide service & information to customers & to manage the relationship	Our legitimate interest in managing our business
	To feed order information through to our distributors and wholesalers	Our legitimate interest in managing our business
	To market to personal customers	By informed consent through a tick box on the shopping cart or the individual signing up to our mailing list on our website or in other ways.
<b>Website Visitors</b> <u>Data about use of website:</u> IP address Geographical location Browser type & version Operating system Referral source Length of visit Page views Website navigation paths Timing, frequency & pattern of use	To allow us to analyse use of the website. We would never tie this information to individuals, even though the information potentially allows us to do so.	For the purposes of our legitimate interests in operating our business, specifically monitoring & improving our website.



**FERNHURST**

BOOKS

<b>PERSONAL DATA</b>	<b>WHY &amp; HOW USED</b>	<b>LEGAL BASIS FOR PROCESSING</b>
<b>Author / Royalty Holders</b> <u>Personal &amp; Employees /</u> <u>Representatives of Trade Royalty</u> <u> Holders</u> Name Address Telephone number(s) E-mail address(es) Bank account details (personal only) Correspondence Photographs	To pay royalties	Performing our contract with the author / royalty holder
	To communicate with & manage the relationship	Our legitimate interest in managing our business
	To promote the author and their books and to illustrate their books	Performing our contract with the author / royalty holder
<b>Licence Rights Holders</b> <u>Personal &amp; Employees /</u> <u>Representatives of Trade Rights</u> <u> Holders</u> Name Address Telephone number(s) E-mail address(es) Bank account details (personal only) Correspondence	To pay & receive royalties	Performing our contract with the licensed rights' holder
	To communicate with & manage the relationship	Our legitimate interest in managing our business
<b>Suppliers</b> <u>Personal &amp; Employees /</u> <u>Representatives of Trade Suppliers</u> Name Address Telephone number(s) E-mail address(es) Bank account details (personal only) Correspondence	To place & manage orders	Our legitimate interest in managing our business
<b>Media Contacts</b> Name Address Telephone number(s) E-mail address(es) Correspondence	To notify of new books & send review copies	Our legitimate interest in managing our business
<b>Employees</b> Name Address Telephone number(s) E-mail address(es) Date of birth Bank account details National Insurance number Correspondence Photographs	To pay & act as employer	To fulfil our contract with the employee
	To provide information to government / tax authorities	To meet our legal obligations
	To use in the company's publicity, including press, websites & other social media platforms	Our legitimate interest & the staff's role in promoting our business



<b>PERSONAL DATA</b>	<b>WHY &amp; HOW USED</b>	<b>LEGAL BASIS FOR PROCESSING</b>
<b>Employees</b> Record & outcome of disciplinary hearings	Managing employees	To fulfil our contract with the employee
<b>Shareholders</b> Name Address Telephone number(s) E-mail address(es) Bank account details Correspondence	To pay dividends	Performing our contract with the shareholder
	To communicate with & manage the relationship	Our legitimate interest in managing our business

### 3. Protecting Your Personal Data

- 3.1 We use generally accepted standards of technology and operational security to protect personal data and keep it secure.
- 3.2 We will promptly tell you of any breach of your personal data which might expose you to serious risk.
- 3.3 We may disclose your personal data to specific third parties to whom we subcontract in order for them to conduct transactions for you and provide services to you on our behalf. However, this will only be personal data that is required for them to undertake this task and we will have a contract requiring them to keep your personal data secure, not to use it for their own purposes and to delete it at the end of the contract.
- 3.4 Financial transactions may be processed through a secure payment system which will have its own privacy policy.
- 3.5 The only other times we will share your personal data with any other third party without your consent is when we are required to do so by law.

### 4. Retaining & Deleting Your Personal Data

- 4.1 We will not keep your personal data for longer than is necessary for the purpose(s) it is held and to fulfil our legal obligations. (We are expected to keep information for 6 years for: claims in contract; tort [excluding personal injury]; tax and VAT; payroll and employment.)
- 4.2 Excepting the above, we will retain your personal data as follows:
- (i) Communication data (name, address, telephone number(s), e-mail address(es): for up to 2 years after you cease to be a customer / business associate / employee of ours.
  - (ii) Transactional data (books ordered, credit card details, bank account details): up to 1 year after the transaction.



(iii) Financial data (bank account details, National Insurance number): up to 2 years after you cease to be a customer / business associate / employee of ours.

## 5. Your Rights

5.1 Under the GDPR your principle rights with regard to your personal data are:

- (i) to have access to the data held
- (ii) to have the data held corrected
- (iii) to have the data held erased (in certain circumstances)
- (iv) to object to or restrict the processing of the data (in certain circumstances)
- (v) to have the data transferred (in certain circumstances)
- (vi) to withdraw consent
- (vii) to complain to the Information Commissioner:

[www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

0303 123 1113

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

This is a very brief summary of your rights. Please refer to the Information Commissioner's website for a full explanation of your rights.

## 6. Our Details

6.1 We can be contacted at:

Fernhurst Books Limited, Regent House, 50 Holly Walk, Leamington Spa, Warwickshire. CV32 4HY.

01926 337488

Please address any questions, comments and requests regarding our data processing practices to our Director by contacting: [jeremy.atkins@fernhurstbooks.com](mailto:jeremy.atkins@fernhurstbooks.com)

14<sup>th</sup> May 2018