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## Privacy Notice for Worldreader Applications

Full version

This Privacy Notice governs your use of Software Applications for mobile devices such as phones and tablets that are developed by Worldreader ("Worldreader Applications"). These Worldreader Applications are mobile optimized and enable users to access and read the copyrighted and open source content available on Worldreader Applications.

This Privacy Notice applies only to Worldreader Applications. If a link leads you to another website, please check the information there for the respective treatment of the personal data concerning you.

### 1. Data Controller

The entity responsible for collecting, processing and using the personal data relating to you (Controller) in terms of the EU General Data Protection Regulation (GDPR), is:

Worldreader.org  
Calle Mallorca, 318 3º 1º  
08037, Barcelona, Spain  
[privacy@worldreader.org](mailto:privacy@worldreader.org)

Worldreader is a global initiative. Our Privacy Notice addresses the standards put in place by the GDPR and all Worldreader affiliates adhere to this Privacy Notice. All users deserve to have their data protected and understand how it's being used.

Please contact the Controller if you have questions with respect to the personal data concerning you, this Data Privacy Notice or how to exercise your rights as a data subject.

## 2. Collection, processing and use of personal data

### 2.1 Personal data

"Personal data" means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

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Worldreader only processes the personal data concerning you (e.g. email address, personal data in the Worldreader Application) in accordance with the provisions of applicable data protection law. The following provisions inform you about the nature, scope and purposes of collecting, processing and using personal data.

## **2.2. Information we collect**

It goes without saying that to help you read more we need some information about you and your device. We collect information generated as you use our services, for example access logs, your email account, as well as information you provide third parties when you access our services through a social media account. If you want additional info, we go into more detail below.

### **2.2.1 Information collected when you use our services**

When you use our services, we collect information about which features you've used, how you've used them and the devices you use to access our services.

#### **Usage Information**

We collect information about your activity on our services, for instance how and when you use them (e.g. date and time you logged in, features you've been using, searches, clicks and pages which have been shown to you, referring web page addresses, suggestions and banners that you click on).

Additionally, Worldreader Applications collect information about the titles you read, the time you spend reading, your searches and other information about how you read when using Worldreader Applications, to help us understand what content is best suited to your needs and extract learnings about digital reading.

#### **Device information**

We collect information from and about the device(s) you use to access our services, including:

- hardware and software information such as IP address, device ID and type, device-specific and apps settings and characteristics, app crashes, browser type, version and language, operating system, time zones, identifiers associated with cookies or other technologies that may uniquely identify your device or browser; and
- information on your wireless and mobile network connection, like your service provider and signal strength.

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Worldreader Applications do not collect precise information about the location of your mobile device. They only collect information at country level based on your current IP address.

We do this pursuant to:

- Art. 6(1)(b) GDPR:
  - to comply our contractual obligations to provide services according to the Terms & Conditions of Worldreader Applications; and
  - because our publishers only let us show their books in some countries. So, without tracking your IP, we cannot determine where you are connecting from and therefore cannot give you access to books; and
- Art. 6(1)(f) GDPR, to pursue our legitimate interests.

### **2.2.2 Information you give us**

You choose to give us certain information when you register an account in one of our services. This includes:

- Username;
- Email address;
- Password;
- Gender;
- Age; and
- Preferred language.

This personal data is recorded on the basis of your consent pursuant to Art. 6(1)(a) GDPR and is used to personalise Worldreader Applications, offer you a better user experience, and continue to improve Worldreader Applications and overall reading programs. This data is not visible to third parties.

If you are using our Booksmart+ Applications, Worldreader may collect data about:

- How many children you read to;
- Your relationship to them;
- The age of the children you read to; and
- Whether you are reading to boys or girls.

This personal data is recorded on the basis of your consent pursuant to Art. 6(1)(a) GDPR and is used to personalise the Booksmart+ Applications, offer you a better user experience by recommending books appropriate for the interests and ages of the children you are reading to and to continue to improve Worldreader Applications and overall reading programs.

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### 2.2.3 Data Provided by Third Parties

You may be able to use your Facebook or Google login details to access account-only functionality of Worldreader Applications. This saves you from having to remember yet another username and password and allows you to share books and your progress in social media. Please refer to the privacy policies of these platforms to understand how they manage and share your personal data.

### 3. Data sharing with third parties

We use third party service providers to help us operate and improve our services. These third parties assist us with various tasks, including data hosting and maintenance, data analytics and data security operations. Worldreader will never sell, rent or trade this information to third parties for commercial reasons. Worldreader will continue to be the controller of your data and the service providers will be the data processors that will only act under our instructions. We sign agreements with all the organisations we share data with to ensure they comply with applicable data law. These service providers will never be allowed to use your data for their own commercial purposes or disclose it to third parties without our consent.

Occasionally, we may share data with some partner organizations that help us implement programs in the different countries we work in. These partners will be required to adhere to this Privacy Notice and you will be asked to provide us your consent before we share your personal data.

Worldreader periodically transfers aggregated and anonymized data to external service providers, research institutions and partners to help us implement and improve our programs and the user experience. We also share this data with publishers that provide us their content, to extract learnings about digital reading. We will not share your personal data with them. We may from time to time publish aggregated data on usage of Worldreader Applications and create reports and studies based on this data.

We may disclose your personal data:

- as required by law, such as to comply with a subpoena, or similar legal process;
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request; and
- with our trusted service providers who work on our behalf, do not have an independent use of the information we disclose to them, and have agreed to adhere to the rules set forth in this Privacy Notice.

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If Worldreader is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our website of any change in ownership or uses of personal data, as well as any choices you may have regarding your personal data.

#### **4. Transfers of Data outside the EEA**

The sharing of the personal data described in previous sections sometimes involves cross-border data transfers. As an example, even though you use a Worldreader Application when you are located in the European Economic Area (“EEA”), your personal data may be transferred to the United States of America or other jurisdictions for the purposes set out in this Privacy Notice. In order to protect your personal data and their use by entities located outside of the EEA, we use standard contract clauses approved by the European Commission or other suitable safeguards to permit data transfers from the EEA to other countries. Standard contractual clauses are commitments between companies transferring personal data, binding them to protect the privacy and security of your personal data to ensure that the level of protection guaranteed by GDPR is maintained.

#### **5. Children**

We do not use Worldreader Applications to knowingly solicit personal data from or market to children under the age of 16. If a parent or guardian becomes aware that their child has provided us with personal data without their consent, he or she should contact us at [privacy@worldreader.org](mailto:privacy@worldreader.org). We will delete such information from our files within a reasonable time.

#### **6. Data Retention Policy, Managing Your Information**

We will retain user-provided data for as long as you use the Worldreader Application and for a reasonable time thereafter. We will retain automatically collected information for a period of 10 years. We may store anonymized, aggregate data indefinitely for research purposes.

#### **7. Security**

We are concerned about safeguarding the confidentiality of your personal data. We provide physical, electronic, and procedural safeguards to protect personal data we process and maintain. For example, we limit access to this information to authorized employees and contractors who need to know that information in order to operate, develop or improve Worldreader Applications. Please be aware that, although we endeavor to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

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## 8. Your rights

Please do not hesitate to contact us using the contact details in section 1 above at any time if you have questions regarding your rights and other topics surrounding personal data.

You have the following rights:

### 8.1 Right of access

You have the right to request, free of charge at any time, information regarding the personal data concerning you that is stored by Worldreader, the origin and recipients of such data, the purpose of data processing, the planned duration of data storage and a copy of the personal data that are being processed (Art. 15 GDPR).

### 8.2 Right to rectification

You further have the right to obtain without undue delay the rectification of inaccurate personal data and to have incomplete personal data completed (Art. 16 GDPR).

### 8.3 Right to withdraw consent

You have the right to withdraw, without stating reasons, your consent to data processing at any time. This will not affect the lawfulness of processing based on consent prior to withdrawal (Art. 7(3) GDPR).

### 8.4 Right to erasure

You have the right to obtain erasure of personal data concerning you without undue delay if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed or if you withdraw your consent to lawful processing and there are no other legal grounds for the processing. If you object to data processing and there are no overriding legitimate grounds for the processing, your personal data will also be erased. Finally, your personal data will be erased if processing is unlawful for any other statutory reasons (Art. 17 GDPR).

### 8.5 Right to restriction of processing

You have the right to obtain restriction of processing if you contest the accuracy of the personal data for a period of time that enables us to review its accuracy.

Data processing is also restricted if processing is unlawful and you oppose erasure of your personal data and instead request restriction of processing, or if we no longer need the personal data for the corresponding purposes, but we need them for the establishment, exercise or defence of legal claims, or if

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you have previously objected to processing, pending verification of whether Worldreader has legitimate grounds to store the personal data that override your interests (Art. 18 GDPR).

### **8.6 Right to data portability**

You have the right to receive the personal data concerning you that you provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller where the processing is based on consent or a contract and the personal data is processed by automated means (Art. 20 GDPR).

### **8.7 Right to object**

Finally, you have the right to object at any time to processing of personal data concerning you in the future.

You have the right to object at any time to the compilation of user profiles and to the processing of the corresponding personal data concerning you where processing is based on legitimate interest. We will no longer process your personal data unless we can demonstrate compelling legitimate grounds for processing which override your interests, rights and freedoms or for the establishment, exercise or defences of legal claims (Art. 21 GDPR).

### **8.8 Right to lodge a complaint**

In addition, you have the right to lodge a complaint with a supervisory authority (Art. 77 GDPR).

## **9. Changes**

This Privacy Notice may be updated from time to time to reflect changes to our privacy practices. In the event of change, we will post the current version in our website [here](#) and within the Worldreader Application you are using. If the changes are significant, we will notify users via Worldreader Application notifications. We encourage you to set your Worldreader Application preferences to receive these notifications and/or periodically review this Privacy Notice for the latest information about our privacy practices.

Last update: March 2020