

# Privacy Policy

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## 1. **Bertrams' Commitment To Your Privacy**

Bertram Books, trading as Bertram Trading Limited (Bertrams, **we, us**) are committed to protecting and respecting your privacy.

This policy, together with our [Terms of Trade](#) and any other documents referred to in it, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [Bertrams.com](#) (**Our site**), opening an account with us and/or providing your Personal Data to us, you are accepting and consenting to the practices described in this policy.

For the purpose of the UK Data Protection Act 1998 (the **Act**), EU General Data Protection Regulation 2016 (2016/679), and applicable legislation in force from time to time, the data controller is. Bertram Trading Limited. Registered address: 1 Broadland Business Park, Norwich, Norfolk, England, NR7 0WF. Registered in England and Wales No 6849888. VAT No 882348007

## 2. Personal Data

### A. What Personal Data Do We Collect?

**Personal Data** is data or pieces of information that could allow you to be personally identified. The type and quantity of Personal Data that we collect and how we use it depends on why you are providing it. We may collect and process the following data about you:

- your name;
- address
- e-mail address;
- phone number and financial, account, credit and debit card information when you make a purchase or call our customer service number;
- technical information, including the Internet Protocol (**IP**) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, device information;
- information about your visit, including the full Uniform Resource Locators (**URL**) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page;
- information collected through cookies, pixel tags and other technologies including shopping habits and preferences;
- location information;
- aggregate information; and
- demographic information and other information provided by you.

In addition, if using our direct mail service, Send My Book, we will collect your customer's Personal Data for the purposes of delivering the order to your customer or the designated address they specify. We do not use or sell this information for marketing or any other

purposes. It is your responsibility to ensure your customer is aware of how their Personal Data will be used.

## **B. How Do We Collect Personal Data?**

We and our suppliers may collect Personal Data in a variety of ways, including:

- **Automatically via Our site:** You may provide us with information about you when you search for a product, place an order, submit a review, use social media functions, register to our site and/or when you report a problem with our site. You will also enter your customer's details when using the Send My Book service.
- **Automatically via the phone/email:** We may collect Personal Data from you when you telephone or email us, such as, but not limited to, our customer services team:
  - **Calls** – We may record calls for training and quality purposes. Where your call is to be recorded, you will be informed of this at the beginning of the call. We may use the information that we collect from you for training and monitoring the quality of the information that we provide you over the telephone. Call recordings are stored securely and access to such recordings is limited to certain personnel only. Recorded calls will be saved for no longer than is necessary.
  - **Emails** – we retain emails to support the fulfilment / resolution of your request / enquiry. Emails are routinely archived.
- **Directly from You:** When voluntarily providing information via online forms on our site or any other mechanism that may be used from time to time.
- **From third parties:** We work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, social networking platforms, analytics providers, public databases, search information providers, credit reference agencies) and may also receive information about you from them. We are not responsible for the privacy, information or other practices of any third parties from which information is received and you should review their policies and practices to ensure you are happy with how they treat your data
- **Social Media sites** - If you elect to connect your social media via our site, certain Personal Data from your social media account will be shared with us which may include Personal Data that is part of your profile or your friends' profiles.

- **Payment services** - In some cases, we may use a third party payment service such as PayPal to process purchases made through the site. In these cases, your Personal Data may be collected by this third party and not by us, and will be subject to the third party's privacy policy, rather than this Privacy Policy. We have no control over, and are not responsible for, this third party's use or disclosure of your Personal Data;
- **Automatically via Cookies:** Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them, please see our [Cookie Policy](#). If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to decline the use of cookies, but it should be noted that some cookies are required to add products to your basket and transact on the site. To learn more about this procedure and cookies more generally please visit the **Cookies Information** page provided by the Information Commissioner's Office (ICO);
- **Automatically via your browser or device:** Certain information is collected by most browsers or automatically through your device. This may include your device location. We use this information for statistical purposes as well as to ensure that the site functions properly;
- **Automatically via server log files:** Your "IP Address" is a number that is automatically assigned to the computer or device that you are using by your Internet Service Provider (ISP). An IP Address is identified and logged automatically in our server log files whenever a user visits the site, along with the time of the visit and the page(s) that were visited.

### C. **How do we Use Personal Data?**

There are several ways in which we use your information. For transparency, we have split this by those which are active by default and those which you can choose to opt in to:

#### **Occurs By Default:**

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us, communicate with you regarding your purchase and respond to your questions and comments;

- to process payment. All financial, credit and debit card information is handled according to Payment Card Industry Data Security Standard (PCI-DSS) compliant rules and processes. We do not store any credit card information and in the few cases where credit cards are used, this information is taken over the phone, processed immediately and not stored.
- as part of our efforts to keep our site safe and secure, and to support fraud protection. Some of this profiling information may sit with third parties such as our email and anti-fraud service providers.
- to build a profile of you with the aim to provide personalised product and service recommendations and supporting material (via any means), should you subsequently request to receive them, We may also use this for, market research, audits, developing new products, enhancing our site, ensuring content is presented in the most effective manner for you and your computer, improving our services and products, identifying usage trends, determining the effectiveness of our promotional campaigns, tailoring the site's experience and content based on your past activities on the site, and gauging customer satisfaction to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes and to send administrative information to you, for example changes to our terms, conditions and policies.
- for information on how we use Cookies, please see our Cookie Policy.
- as we believe to be necessary or appropriate: (a) to comply with applicable laws, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

**Requires You To Opt-In:**

- to provide you with information about other goods and services we offer that are similar to those that you have already browsed, purchased or enquired about, in a way that is as relevant to you as possible. See section E. "Targeted Advertising" for further details;

- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you (see section E. “Targeted Advertising”);
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them;

#### **D. Disclosure Of Your Information**

Bertrams is part of Aurelius Equity Opportunities. We may share your Personal Data with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may share your information with selected third parties including:

- Third parties including business partners, suppliers and sub-contractors who provide services to us (such as credit card processing services, order fulfilment, analytics, site management, information technology and related infrastructure provision, customer service, e-mail service providers for sending transactional and marketing emails, auditing, and other similar services). When we share Personal Data with such third party providers we require that they use your Personal Data to the extent necessary for providing services to us (or you, as the case may be) and not for their own marketing purposes;
- Advertisers and advertising networks that require selected data to tailor and serve relevant adverts to you and others (please see below section E. ‘Targeted Advertising’ for more information). For the avoidance of doubt, we will never share sensitive Personal Data, such as your bank, credit / debit card or full address details for such purposes;
- Analytics and search engine providers that assist us in the improvement and optimisation of our site;
- To prospective buyers, in the event that we sell any business or assets, in which case we may disclose your personal data to the prospective buyers of such business or assets. All customer data held by us is considered the property of Bertrams
- In the event that Bertrams or substantially all of its assets are acquired by a third party, in which case Personal Data held by it about its customers will be one of the transferred assets; and

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our [Terms of Trade](#) or [Terms or Conditions of Business](#) or to protect the rights, property, or safety of Bertram Books Limited, our customers, or others.

## E. Targeted Advertising

If you choose to opt in, we may use information on your buying patterns to target marketing to you by email or print. You can change your preferences at any time by unsubscribing from emails or using our website or customer services to sign up to or opt out of receiving our publications.

## 3. Storage, Retention and Security

All Personal Data you provide to us is stored on our secure servers and will be held indefinitely unless you request otherwise. The only variation to this policy is your customer's Personal Data submitted via Send My Book, which is held for no longer than 90 days.

All interactions with our website, including payment transactions, will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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 our site; 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.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("**EEA**"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers; this includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services.

By using our site, you acknowledge and consent to the potential transfer, processing and storage outside of the EEA. You should be aware that many countries outside the EEA do not afford the same legal protections to Personal Data as countries within the EEA.

Transfers will be made in accordance with the applicable legislation and we will take

reasonable and necessary measures (so far as it is within our control to do so) to ensure that third parties involved will provide an adequate level of protection.

#### **4. Access, Modification and Choices**

We aim to give you as many choices regarding our use and disclosure of your Personal Data.

You have the right to ask us not to use your Personal Data for marketing purposes. The easiest way to do so is by clicking the link provided at the bottom of any one of our emails in order to unsubscribe. To find out more about the ways in which you can opt-out please [Contact Us](#).

Please note that changes to our use of your Personal Data may not be effective immediately. We will endeavour to comply with your request(s) as soon as reasonably practicable and in no event later than 30 days after we receive your request. Please also note that if you do opt-out of receiving marketing-related messages from us, we may still send you important administrative messages.

When you order from us, we will send you administrative emails relating to that order. These include but are not limited to: a confirmation of your order, notification of dispatch, and tracking information. If you receive an email confirmation of an order you did not place please contact us.

You have the right to access, change and/or delete Personal Data we hold about you. Your right of access can be exercised in accordance with applicable laws. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you. We will notify you if a charge is applicable before proceeding with your request.

We will try to comply with your requests as soon as reasonably practicable and within a maximum of 30 days. If your request is more complex, we will provide an update within 30 days, and aim to comply within a maximum of 90 days. Please note that despite our efforts, there may be residual information that will remain within our databases and other records, which will not be removed or changed immediately. Further, please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting such change or deletion (e.g. when you make a purchase or enter a promotion, you may not be able to change or delete the Personal Data provided until after the completion of such purchase or promotion).



The consequences of choosing not to provide your Personal Data that we request from time to time are that we may not be able to deliver the goods or services you have requested, fulfil your orders or carry out our obligations under any contract entered into between you and us. Please [Contact Us](#) if you would like to understand more about your options.

## **5. Third Party Sites**

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site where the site contains a link to Bertrams.com. The inclusion of a link on our site does not imply endorsement of the linked site by us.

We are also not responsible for the collection, usage and disclosure policies and practices (including the data security practices) of other organisations, such as Facebook, Apple, Twitter, Google, Microsoft or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any Personal Data you disclose to other organisations through or in connection with apps or social media that we choose to develop in future.

## **6. Retention Period**

We will retain your Personal Data only for the period necessary to fulfil the purposes outlined in this Privacy Policy. We have an internal retention policy where there are varying retention periods for different categories of information depending on our legal obligations and whether there is a commercial need, such as answering customer account queries. After a retention period has elapsed, the data is either anonymized or deleted.

## **7. Children's Personal Data**

All our customers are adults, and must be over 18 to purchase books from us. We do occasionally run competitions in our consumer magazines, where children may enter with the express permission of a parent. All competition entries are destroyed as soon as possible after the closing date of the competition and prizes have been awarded.

## **8. Sensitive Information**

We generally ask that you do not send us, and you do not disclose, any sensitive Personal Data (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health or medical condition, criminal background or trade union membership) on or through the site or otherwise to us. If you believe that we have mistakenly or unintentionally collected sensitive Personal Data through our channels please [Contact Us](#) immediately.

## 9. Changes To Our Privacy Policy

Any changes we may make to our Privacy Policy in the future will be posted on this page. You will also be notified via email of any material changes to the Policy. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the site. Your continued use of the site following these changes means that you are deemed to accept the revised Privacy Policy.

## 10. Contact

As stated in the sections above, you have various rights with regard to your Personal Data including the right to tell us if you:

- do not want to be contacted in the future by us;
- would like to find out what information we have about you, would like a copy of the Personal Data which we hold about you. (You may be charged an administration fee when we provide you with the requested information to cover our time and postage and handling or retrieval costs);
- if you think that any Personal Data we hold about you is inaccurate, incomplete, out-of-date or irrelevant; and
- wish to report any breaches of the Privacy Policy.

If you have any questions or complaints about this Privacy Policy, please [Contact Us](#). We will investigate any complaint, and notify you of our decision in relation to the complaint, as soon as practicable after it is received.

If we are unable to satisfactorily resolve your concerns about our handling of your Personal Data, you can contact the Information Commissioner's Office (ICO) either through their website: <http://ico.org.uk/> or through the ICO telephone helpline: 0303 123 1113.