



## The Little Group Privacy Policy

### INTRODUCTION

We understand that privacy and the security of your personal information is extremely important. Because of that, this policy sets out what we do with your information and what we do to keep it secure. It also explains where and how we collect your personal information, as well as your rights over any personal information we hold about you.

This policy applies to you if you use our products or services over the phone, online, through our mobile applications or otherwise by using any of our websites or interacting with us on social media (our “Services”). This policy gives effect to our commitment to protect your personal information and has been adopted by all of the companies and businesses in our group (including Askews & Holts Library Services, Book Protectors, Browns Books for Students, Gardners, Hive and Lasgo).

### Who are we

When we say ‘we’ or ‘us’ in this policy, we’re generally referring to the separate and distinct legal entities that make up The Little Group (although it does depend on the context). These include:

- Askews and Holts Library Services Ltd. (registered office: 1 Whittle Drive, Eastbourne, East Sussex, United Kingdom, BN23 6QH)
- Book Protectors & Co. Limited (registered office: 1 Whittle Drive, Eastbourne, East Sussex, United Kingdom, BN23 6QH)
- A.T. Little & Sons Limited (trading as Browns Books for Students, registered office: 22-28 George Street, Kingston Upon Hull, Yorkshire, HU1 3AP)
- Gardners Books Limited (registered office: 1 Whittle Drive, Eastbourne, East Sussex, United Kingdom, BN23 6QH)
- Hive Store Limited (registered office: 1 Whittle Drive, Eastbourne, East Sussex, United Kingdom, BN23 6QH)
- Lasgo Chrysalis Limited (trading as Lasgo Worldwide Media, registered office: 1 Whittle Drive, Eastbourne, East Sussex, United Kingdom, BN23 6QH).

### What sorts of information do we hold

- Information that you provide to us such as your name, address, date of birth, telephone number, email address, bank account and payment card details and any feedback you give to us, including by phone, email, post, or when you communicate with us via social media;
- Information about the Services that we provide to you (including for example, the things we have provided to you, when and where, what you paid, the way you use our products and Services, and so on);
- Your account login details, including your user name and chosen password;
- Information about any device you have used to access our Services (such as your device’s make and model, browser or IP address) and also how you use our Services;
- Your contact details and details of the emails and other electronic communications you receive from us, including whether that communication has been opened and if you have clicked on any links within that communication;
- Information from other sources such as our retail partners, specialist companies that provide customer information (like credit reference agencies and fraud prevention agencies) social media providers as well as information that is publicly available.

## **How do we use your information**

The information we collect may be used to:

- Make available our Services to you;
- Process your orders;
- Take payment from you or give you a refund;
- Personalise our Services, for example by understanding your location or how you use our apps and websites to provide you with personalised offers;
- Help us ensure that our customers are genuine and to prevent fraud;
- For statistical analysis;
- Help us understand more about you as a customer, the products and services you consume, so we can serve you better;
- Contact you about products and services from us;
- Provide you with online advertising;
- Help answer your questions and solve any issues you have.

## **Who we might share your information with**

- Our service providers

We work with partners, suppliers, insurers and agencies so they can process your personal information on our behalf...but only where they meet our standards on the processing of data and security!

We only share information that allows them to provide their services to us or to facilitate them providing their services to you. For example, some of our service providers place advertising for us online, about our products and services and those of our retail partners, suppliers and third parties. As a result, where you have indicated you are happy to receive marketing from us, you might see online advertising that we have placed on the web sites you visit, or the interactive services you use.

- Other organisations and individuals:

We may transfer your personal information to other organisations in certain scenarios. For example:

- We may use a credit scoring agency as part of our due diligence to help us set an appropriate credit limit for your business when you apply for an account.
- If we're discussing selling or transferring part or all of a business, we may share information about you to prospective purchasers - but only so they can evaluate that business;
- If we are reorganised or sold to another organisation, we may transfer information we hold about you to them so they can continue to provide the Services to you;
- If required to by law, under any code of practice by which we are bound or we are asked to do so by a public or regulatory authority such as the Police;
- If we need to do so in order to exercise or protect our legal rights, users, systems and Services; or
- In response to requests from individuals (or their representatives) seeking to protect their legal rights or the rights of others.

## **Keeping you informed about our products and services**

We may keep you informed of our Products and Services through the post, by email, text message, online, using social media or by any other electronic means. We won't send you marketing messages if you tell us not to but we will still need to send you occasional service-related messages. If you no longer wish to receive marketing messages you can do so by an email unsubscribe or by contacting us at the address below.

## **Your rights**

- Access and correction of your personal information

You have the right to access the personal information that we hold about you in many circumstances. This is sometimes called a 'Subject Access Request'. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge.

Before providing personal information to you or another person on your behalf, we may ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information.

If any of the personal information we hold about you is inaccurate or out of date, you may ask us to correct it.

If you would like to exercise these rights, please contact us as set out below.

- Right to stop or limit our processing of your data

You have the right to object to us processing your personal information if we are not entitled to use it any more, to have your information deleted if we are keeping it too long or have its processing restricted in certain circumstances.

If you would like to exercise this right, please contact us as set out below.

## **How long will we keep your information for?**

We will retain a record of your personal information. This is done in order to provide you with a high quality and consistent service across our group. We will always retain your personal information in accordance with law and regulation and never retain your information for longer than is necessary.

## **Links to other websites**

We sometimes provide you with links to other websites, but these websites are not under our control. Therefore we will not be liable to you for any issues arising in connection with their use of your information, the website content or the services offered to you by these websites. We advise you to consult the privacy policy and terms and conditions on each website to see how each supplier may process your information.

## **Sharing your thoughts**

When using one of our websites or mobile applications, you may be able to share information through social networks like Facebook and Twitter. For example when you 'like', 'share' or review our Services. When doing this your personal information may be visible to the providers of those social networks, their other users and/or The Little Group Companies. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts so you are comfortable with how your information is used and shared on them.

## **Security**

We take security measures to protect your information including:

- limiting access to our buildings to those that we believe are entitled to be there (by use of passes, key card access and other related technologies);
- implementing access controls to our information technology, including, but not limited to; firewalls, ID verification and logical segmentation and/ or physical separation of our systems and information;

**Contact us:**

If you would like to exercise one of your rights as set out above, or you have a question or a complaint about this policy, the way your personal information is processed, please contact us by one of the following means:

By email: [dataprotection@littlegroup.com](mailto:dataprotection@littlegroup.com) By post: Data Protection, The Little Group, 1 Whittle Drive, Eastbourne, East Sussex, United Kingdom, BN23 6QH

You also have the right to lodge a complaint with the UK regulator, the Information Commissioner. Go to [ico.org.uk/concerns](http://ico.org.uk/concerns) to find out more.

**Policy Change**

This privacy policy was most recently updated in May 2018.