

Introduction

Welcome to the Harold Grinspoon Foundation PJ Library's Privacy Policy. This Privacy Policy governs the manner in which the Harold Grinspoon Foundation PJ Library (which operates PJ Library) collects, uses, maintains and discloses information collected from users of the www.pjlibrary.org.uk (site). It does not apply to information collected offline.

The Harold Grinspoon Foundation respects your privacy and is committed to protecting its users' personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Please note that the Harold Grinspoon Foundation is based in the United States. The Harold Grinspoon Foundation is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC) and complies with all relevant international, federal, and state laws regarding the collection, storage, usage, and transfer of personal data and information.

The Harold Grinspoon Foundation commits and adheres to the Principles defined in the EU-U.S. Privacy Shield as set forth by the U.S. Department of Commerce (DOC) regarding the collection, use, and retention of personal data and information.

This privacy notice 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 [\[LINK\]](#). Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how the Harold Grinspoon Foundation collects and processes your personal data through your use of this website, including any data you may provide through

this website when you register/enroll in the PJ Library program via the site, subscribe to our newsletter, fill out a form or donate.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

The Harold Grinspoon Foundation is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy policy).

This privacy policy is issued on behalf of The Harold Grinspoon Foundation so when we mention "The Harold Grinspoon Foundation", "we", "us" or "our" in this privacy policy, we are referring to the relevant entity in The Harold Grinspoon Foundation Group responsible for processing your data. The Harold Grinspoon Foundation is the data controller and is responsible for this website.

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 privacy notice, including any requests to exercise your legal rights (as detailed below), please contact the data privacy manager using the details set out below.

Contact details

Our full details are:

Full name of legal entity: The Harold Grinspoon Foundation, a 501c3 non-profit organization.

Name or title of data privacy contact person: Alex Zablotsky

Email address: alex@hgf.org

Postal address: 67 Hunt Street, Suite 100, Agawam, MA 10001

You 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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version of the privacy policy was last updated on **July 31, 2018**.

The data protection law in the UK will change on 25 May 2018. Although this privacy notice sets out most of your rights under the new laws, we may not yet be able to respond to some of your requests (for

example, a request for the transfer of your personal data) until May 2018 as we are still working towards getting our systems ready for some of these changes.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Users may visit our site anonymously. We will collect such personal identification information from Users only if they voluntarily submit such information to us. Users can always refuse to supply such personal identification information, except that it may prevent them from engaging in certain site related activities the PJ Library program (such as enrolling in the book-supplying program).

There is no statutory requirement for you to provide us with your data. However, if you do not provide your information, we will not be able to provide you with our services.

When enrolling, renewing or donating on our site, we may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier, marital status, title, date of birth and gender, as well as the name, birthday and gender of the child being enrolled in the program.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial and Donation Data** includes bank account and payment card details.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or

connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If a parent is signing up for the PJ Library service, we may collect information about **children**. In such a case, we will request that the child's parent or legal guardian consents to such processing.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your identity and contact data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Enroll in the PJ Library program;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy [\[LINK\]](#) for further details.

4. How we use your personal data

We will only use the details collected from you:

- For the purposes of your enrolment and the administration of the site;
- To carry out services under our contracts with you;
- To improve customer service;
- To administer and maintain our activities and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- To contact you (including sending information and updates relating to any order, questions or requests) or for the provision of customer services;
- To use data analytics to improve our website, products/services, marketing, user relationships and experiences;
- To make suggestions and recommendations to you about goods or services that may be of interest to you.

We rely on consent as a legal basis for processing your personal data (for example in relation to sending third party direct marketing communications to you via email or text message). You have the right to

withdraw consent to marketing at any time by [contacting us](#). In certain circumstances we rely on the fact that we must process your information in order to perform a contract with you.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
For the purposes of your enrolment and the administration of the site	(a) Identity (b) Contact	Performance of a contract with you
To carry out services under our contracts with you	(a) Identity (b) Contact (e) Marketing and Communications	Performance of a contract with you
To improve customer service	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and maintain our activities and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our charity, provision of administration and IT services, network security, and to prevent fraud) (b) Necessary to comply with a legal obligation
To contact you (including sending information and updates relating to any order, questions or requests) or for the provision of customer services	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how users use our products/services, and to develop them)
To use data analytics to improve our website, products/services,	(a) Technical	Necessary for our legitimate interests (to define types of users for our products and

marketing, user relationships and experiences	(b) Usage	services, to keep our website updated and relevant and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or if you have enrolled in the PJ Library program and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Harold Grinspoon Foundation group for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by [contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of enrolling in the PJ Library program.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [\[LINK TO YOUR COOKIE POLICY\]](#).

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

We may also be required to disclose your personal data in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

We do not sell, trade, or rent personal identification information collected from Users to others. We may share generic aggregated demographic information not linked to any personal identification information regarding Users with our business partners, trusted affiliates and advertisers for the purposes outlined above. For example, if you have enrolled in the PJ Library program, we use a third-party contractor to post the books to you every month.

If donations are collected, then we will use a third-party service provider to process your donations and we will share your information with them for that purpose only. We may also use third party service providers to help us operate our business and the site or administer activities on our behalf, such as sending out newsletters or surveys. We may share your information with these third parties for those limited purposes unless you have asked us not to do so at registration or afterwards.

We may disclose personal information obtained from you to third parties:

- In the circumstances set out above.
- In the event that we sell or buy any business or assets, in which case we may disclose personal data obtained from you to the prospective seller or buyer of such business or assets.
- If PJ Library 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.
- If we are under a duty to disclose or share personal data obtained from you in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions and other agreements; or to protect the rights, property, or safety of PJ Library, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

PJ Library is based in the United States. We therefore store and process personal information and content outside the European Economic Area ("**EEA**"), in the US. The information may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your subscription, the processing of your payment details and the

provision of support services. By submitting your personal identification information, you agree to this transfer, storing or processing.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented. In particular, we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#). Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#) on https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en.

The Harold Grinspoon Foundation complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. The Harold Grinspoon Foundation has certified to the United States Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov>.

In compliance with the Privacy Shield Principles, the Harold Grinspoon Foundation commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Alexander Zablotsky, Director of Operations at the Harold Grinspoon Foundation at 413-276-0744 or alex@hgf.org.

The Harold Grinspoon Foundation has further committed to refer unresolved Privacy Shield complaints to our independent recourse mechanism, the American Arbitration Association International Centre for Dispute Resolution, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact or visit <http://go.adr.org/privacyshield.html> for more information or to file a complaint. The services of the American Arbitration Association International Centre for Dispute Resolution are provided at no cost to you.

Under certain conditions, if the above independent recourse mechanism is unable to resolve your complaint, you may be eligible to invoke binding arbitration before the Privacy Shield panel.

In cases of onward transfer to third parties of personal data received pursuant to the EU-U.S. Privacy Shield, the Harold Grinspoon Foundation is potentially liable.

7. Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need

to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

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 for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: Please contact us for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

Please refer to the ICO's website (www.ico.org.uk) for more information about these rights. If you wish to exercise any of the rights set out above, please [contact us](#).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our foundation in conducting and managing our foundation and this website to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

- Service providers acting as processors: 1. Prism The Gift Fund, a registered charity based in the UK (number 1099682), which provide general administrative support for our UK operation. 2. Air Business Limited, a company incorporated in England and Wales with company number 01977067, which provides logistical assistance for the PJ Library mailing services in the UK.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK and/or the US who provide banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.