Privacy Policy

This is the privacy policy ("policy") for this website which is run and provided by Macmillan Publishers Limited, Macmillan Education, The Macmillan Campus, 4 Crinan Street, London, N1 9XW UK, <u>help@macmillaneducation.com</u>.

We will only use the personal data gathered over this website as set out in this policy. Below you will find information on how we use your personal data, for which purposes your personal data is used, with whom it is shared and what control and information rights you may have.

I. Summary of our processing activities

- The following summary provides you with a quick overview of the processing activities that are undertaken on our website. You will find more detailed information under the indicated sections below.
 - When you visit our website for informational reasons without setting up an account, only limited personal data will be processed to provide you with the website itself (see III).
 - In case you register for one our services (e.g. discussion forum, blog or web shop) or subscribe to our newsletter, further personal data will be processed in the scope of such services (see IV, V and VI).
 - Furthermore, your personal data will be used to provide you with interesting advertising for our services and products (see VIII) and for statistical analysis that helps us to improve our website (see IX). Additionally, we improve your website experience with third party content (see X).
 - Your personal data may be disclosed to third parties (see XI) that might be located outside your country of residence; potentially, different data protection standards may apply (see XII).

- We have implemented appropriate safeguards to secure your personal data (see XIII) and retain your personal data only as long as necessary (see XIV).
- Under the legislation applicable to you, you may be entitled to exercise certain rights with regard to the processing of your personal data (see XV).

II. Definitions

- **Personal data:** means any information relating to a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, or an online identifier.
- **Processing:** means any operation which is performed on personal data, such as collection, recording, organisation, structuring, storage, adaptation or any kind of disclosure or other use.

I. Informational use of the website

- When you visit our website for informational reasons, i.e. without registering for any of our provided services listed under IV and without providing us with personal data in any other form, we may automatically collect additional information about you which will contain personal data only in limited cases and which is automatically recognised by our server, such as:
- IP address;
- device type, name and IDs;
- the date and time of your requests;
- the content of your requests;
- information on your browser version;
- your screen resolution;
- information on your operating system, including language settings.

We use such information only to assist us in providing an effective service (e.g. to adapt our website to the needs of your device or to allow you to log in to our website), and to collect broad demographic information for anonymised, aggregated use.

The personal data automatically collected is necessary for us to provide the website, Article 6 sec. 1 sent. 1 lit. b GDPR, and for our legitimate interest to guarantee the website's stability and security, Article 6 sec. 1 sent. 1 lit. f GDPR.

Personal data that is collected automatically is retained for 24 months and properly erased afterwards.

II. Automated decision making

We do not use your personal data for automated decision making which produces legal effects concerning you or similarly significantly affects you.

III. Analysis

For statistical analyses we use a tool called Google Analytics a web analytics service provided by Google LLC, Googleplex, Mountain View, California, U.S, to collect information about the use of this site.

- IV. The tool collects information such as users visiting the website, what content pages are accessed, IP addresses (geographic location), type of device you are accessing the website on, language of device you are accessing the website on, etc. We use the information we get from Google Analytics only to determine the most useful information you are looking for, and to improve and optimise this website. We do not combine the information collected through the use of Google Analytics with personal data.
- V. The information generated about your use of the website will be transmitted to and stored by Google Analytics on servers in the United States. Google Analytics collects only the IP address assigned to you on the date you visit this site, rather than your name or any other identifying information. The provider will use this information in order to evaluate your use of the website, to compile reports on website activities and to provide other services relating to website and internet use to us.
- The legal basis for this processing is Art. 6 sec. 1 sent. 1 lit. f GDPR and represents our legitimate interest to analyse our website's traffic to improve the user's experience and to optimise the website in general.

1. Third party content and social media plug-ins Social media plug-ins

We use the following social media plug-ins: Twitter. This allows you to communicate with such services and like or comment from our website. Social media plug-ins enable a direct communication between your device and the servers of the social media provider, allowing the social media provider to communicate with you and collect information about you browsing our website. This processing is based on Article 6 sec. 1 sent. 1 lit. f GDPR and represents our legitimate interest to improve your website experience and to optimise our services.

Transfer of personal data takes places whether you have an account with the provider or not.

- Please note that we neither have the control of the extent of personal data that is collected by the respective plug-in provider nor do we know the processing's purpose or the period your personal data will be retained.
- Further information about the processing of your personal data in the provider's course of operation is provided via their respective privacy policy. Moreover, you will be provided with further information with regard to your rights and setting concerning privacy.
- We use the Youtube's service in order to host videos on our website. This processing is based on Article 6 sec. 1 sent. 1 lit. f GDPR and represents our legitimate interest to improve your website experience and to optimise our services.

Your browser will directly communicate with Youtube YouTube, LLC, 901 Cherry Ave.

San Bruno, CA 94066, USA. We do not have any influence on Youtube's data processing activities. Please check Youtube's privacy policy for further information https://support.google.com/youtube/answer/7671399?hl=en-GB. Here you can find information about your rights and privacy settings. Your data will be sent to a country outside the EEA.

VI. [Cross border data transfers]

Within the scope of our information sharing activities set out above, your personal data may be transferred to other countries (including countries outside the EEA) which may have different data protection standards from your country of residence. Please note that data processed in a foreign country may be subject to foreign laws and accessible to foreign governments, courts, law enforcement, and regulatory agencies. However, we will endeavour to take reasonable measures to maintain an adequate level of data protection when sharing your personal data with such countries.

In the case of a transfer to a country outside of the EEA, this transfer is safeguarded by *EU Standard Contractual Clauses*. You can find further information about the aforementioned safeguards under :

https://ec.europa.eu/info/law/law-topic/data-protection_en

or by contacting the Data Protection Team at dataprotection@springernature.com

VII. Security

We have reasonable state of the art security measures in place to protect against the loss, misuse and alteration of personal data under our control. For example, our security and privacy policies are periodically reviewed and enhanced as necessary and only authorised personnel have access to personal data. Whilst we cannot ensure or guarantee that loss, misuse or alteration of information will never occur, we use all reasonable efforts to prevent it.

You should bear in mind that submission of information over the internet is never entirely secure. We cannot guarantee the security of information you submit via our website whilst it is in transit over the internet and any such submission is at your own risk.

VIII. Data retention

We strive to keep our processing activities with respect to your personal data as limited as possible. In the absence of specific retention periods set out in this policy, your personal data will be retained only for as long as we need it to fulfil the purpose for which we have collected it and, if applicable, as long as required by statutory retention requirements.

IX. Your rights

Under the legislation applicable to you, you may be entitled to exercise some or all of the following rights:

1. require (i) information as to whether your personal data is retained and (ii) access to and/or duplicates of your personal data retained, including the purposes of the processing, the categories of personal data concerned, and the data recipients as well as potential retention periods;

2. request rectification, removal or restriction of your personal data, e.g. because (i) it is incomplete or inaccurate, (ii) it is no longer needed for the purposes for which it was collected, or (iii) the consent on which the processing was based has been withdrawn;

3. refuse to provide and – without impact to data processing activities that have taken place before such withdrawal – withdraw your consent to processing of your personal data at any time;

4. object, on grounds relating to your particular situation, that your personal data shall be subject to a processing. In this case, please provide us with information about your particular situation. After the assessment of the facts presented by you we will either stop processing your personal data or present you our compelling legitimate grounds for an ongoing processing;

5. take legal actions in relation to any potential breach of your rights regarding the processing of your personal data, as well as to lodge complaints before the competent data protection regulators;

6. require (i) to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and (ii) to transmit those data to another controller without hindrance from our side; where technically feasible you shall have the right to have the personal data transmitted directly from us to another controller; and/or

7. not to be subject to any automated decision making, including profiling (automatic decisions based on data processing by automatic means, for the purpose of assessing several personal aspects) which produce legal effects on you or affects you with similar significance.

You may (i) exercise the rights referred to above or (ii) pose any questions or (iii) make any complaints regarding our data processing by contacting us using the contact details set out below.

X. Contacting us

- Please submit any questions, concerns or comments you have about this privacy policy or any requests concerning your personal data by email to our Group Data Protection Officer. You can contact our Group Data Protection Officer via dataprotection@springernature.com.
- The information you provide when contacting us at help@macmillaneducation.com will be processed to handle your request and will be erased when your request is completed. Alternatively, we will restrict the processing of the respective information in accordance with statutory retention requirements.

XI. Amendments to this policy

We reserve the right to change this policy from time to time by updating our website respectively. Please visit the website regularly and check our respective current privacy policy. This policy was last updated in May 2018.