

# Cookie and Privacy Policy

## QDT.COM PRIVACY AND COOKIE NOTICE

### 1. Introduction

Effective Date: July 2020

We at Quick and Dirty Tips, a division of Macmillan Publishing Group, LLC (“QDT,” “we” or “us”) respect your concerns about privacy and value the relationship we have with you. This Privacy and Cookie Notice applies to personal information we collect through any online interface (e.g., website, mobile application, or other interactive service) that contains a link to this Notice authorized by us (the “Site(s)”). This Notice also applies to personal information we receive outside of our Sites, e.g., contact information we receive at trade shows, business meetings or through publicly available websites or publications.

This Privacy Notice describes the types of personal information we collect, how we may use the information, with whom we may share it and the choices available to you regarding our use of the information. We also describe the measures we take to safeguard the information and tell you how to contact us about our privacy practices.

### [Important Information for Individuals in the European Union](#)

### [Important Information for Individuals in California](#)

Click on one of the links below to jump to the listed section:

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### 2. Information We Collect

We may obtain certain personal information (such as name and other contact details that enable us to identify you) when you choose to provide it to us, when it is publicly available, automatically from our Sites or from third parties. “**Personal Information**” is any information that can be used to identify, locate

or contact you. It also includes other information that may be associated with your name or other identifiers. We collect the following types of Personal Information:

The types of personal information we may collect include:

- contact information, such as your name, postal address, e-mail address and telephone number;
- month and year of birth;
- username and password;
- personal information in comments and other content (including manuscripts) you provide on or through our Sites or social media pages;— payment information, such as name, billing address, shipping address, phone number and credit card number;
- information concerning your interests and product preferences;
- poll, survey and/or questionnaire responses;
- sweepstakes, contest and/or promotion entries;
- the content of your communications with us; and
- contact information provided at conferences or other places, such as on business cards or through conference badge swipes and from public websites or other publicly available sources.

In addition, when you visit our Sites, we may collect certain information by automated means, such as cookies and web beacons. The information we collect in this manner includes IP address, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken on our site, and dates and times of visits to the Sites. By collecting this information, we can better understand activity on our Site learn how to best tailor our Sites to our visitors. While we generally examine such information only in the aggregate, such information could be linked back to individual IP addresses or other information about you. For more information on cookies, see the next section.

### **3. Cookies and Online Tracking**

This section explains our approach to cookies and other online data collection technologies.

When you visit our websites, use our mobile apps, engage with our online ads or emails. we collect information, using technologies such as cookies, pixel tags (also called web beacons), browser analysis tools, and server logs. Each of these technologies is explained below.

#### **I. Why We Use Cookies**

The data we collect with cookies and other tools is used for many different purposes.

- **Strictly necessary cookies** and tags are used by us to make our websites and apps work. They enable core functions, such as authentication, security, network management, and accessibility. You may be able to disable these by changing your browser settings, but this may affect how the website functions.
- **Performance and analytics cookies** and tags are used by us and our service providers to manage our websites. This may include collecting analytics cookies about visitors to our website and collecting information about website usage. We use the information to compile reports and to help us improve the website. These cookies help us gather data to optimize our website's performance. We do not use the data collected by these cookies for targeted marketing.

- **Site experience cookies** and tags are used to support your experience and include user-selected options and site navigation aids. These cookies provided enhanced functionality and personalization on our sites. If you do not allow these cookies, some services on our websites may not function properly.
- **Marketing and personalization cookies** are used to enable social sharing and to deliver interest-based ads to you online. These cookies include:
  - **Social media cookies** and tags used by us and social media platforms (such as Facebook) to enable users of the platforms to share content across our sites. We also work with social media platforms, such as Facebook and Instagram, to deliver ads to you when you use these platforms. This targeting is done by the platform under its own terms of use.
  - **Advertising cookies** and tags used by us, our service providers, and third parties to personalize the ads delivered to you on our site and on other sites. These cookies collect data about your online activity and allow ads to be displayed that may be of interest to you. These cookies also record which ads you have seen and whether you engaged with the ad. These cookies help make sure that the ads you see are relevant and not repetitive.

While we do not give any personally identifiable information to the third-party advertising companies, we may place cookies and tags for them when you visit our website. This allows these third parties to collect information from you using these technologies on our websites. The information they collect is subject to their own privacy policies.

## II. Your Choices

- You can manage the non-essential cookies placed by and for us using the [UserCentrics control platform](#). Many of our websites only place marketing, personalization and advertising cookies if you explicitly accept these cookies by clicking “Accept All Cookies” when you first visit the website. If you have accepted cookies, you can use this link to adjust your preferences.
- You can manage cookies and delete cookies from Macmillan and companies using your browser settings. Browsers such as Chrome, Internet Explorer, Firefox and Safari give you the ability to accept, reject or delete cookies. Visit the “help center” for your browser to learn more. Please note that your browser settings are not used to manage Flash or Silverlight cookies. To manage Adobe Flash Cookies, visit the [Flash Player help page](#). To manage Microsoft Silverlight Cookies, visit the [Silverlight section of Microsoft’s privacy statement](#).
- You can take advantage of industry programs that allow you to control the way companies advertise to you.
  - The Network Advertising Initiative (NAI) manages an opt-out program for many third party advertising companies. You can opt out of being targeted by NAI members by visiting [https://www.networkadvertising.org/consumer/opt\\_out.asp](https://www.networkadvertising.org/consumer/opt_out.asp).
  - On some websites, you may see an AdChoices icon, which may appear on certain targeted ads. You may click on this AdChoices icon to learn more information about the collection and use of your information or to opt-out of such collection in the future. To learn more about the Digital Advertising Alliance Consumer Choice tool, please visit <http://optout.aboutads.info>. Users in Canada can visit the DAA at <http://youradchoices.ca/choices/>. Users in the EU can visit the DAA at: <http://www.youronlinechoices.eu>.

- **Adobe Marketing Cloud:** If you would like more information on how to remove yourself from the tracking and reporting functions performed for this website by Adobe Marketing Cloud, please visit the Opt-Out page at <http://www.adobe.com/privacy/marketing-cloud.html>.
- **Google:** For information on how Google Analytics uses data please visit “How Google uses data when you use our partners’ sites or apps”, located at <https://www.google.com/policies/privacy/partners>.

In most cases, the choices you make are linked to your browser. If you use different browsers or different devices, you will need to set your preferences on each one. Even if you opt-out, you may still receive ads that are not customized for you.

Although our websites do not have a mechanism to recognize the various web browser Do Not Track signals, we do offer our customers choices to manage their cookie preferences as described in the previous section. To learn more about browser tracking signals and Do Not Track please visit <https://www.allaboutdnt.org>.

Residents of some states and countries have additional privacy rights. Please contact us at [dataprivacy@macmillan.com](mailto:dataprivacy@macmillan.com) if you have any questions.

### III. Social Media and other Platforms

Our websites may enable you to interact with us and others via social media platforms, such as Facebook, Twitter, LinkedIn and Instagram. This functionality is enabled using social media cookies and tags. For example, some Macmillan websites allow you to sign in using social media platform credentials. Please read the privacy statements provided by your social media platforms to understand how they use your information and to manage your choices.

We may display interest-based ads to you when you are using platforms such as Facebook and Google. These platforms allow us to personalize the ads that we display to you. To enable delivery of these ads, we convert your email address into a unique number. The platforms also convert their user emails into unique numbers using the same process. This allows the records to be matched without any exchange of data elements that can identify you on their own. The platforms perform the matching as a service provider to Macmillan, and they do not retain or use the file that we send them for their own purposes. This process allows the platform to deliver our ads to our customers on the platform. The platforms may gain insights about individuals who respond to the ads we serve.

### IV. Other Types of Online Data Collection

Our **server logs** record information about users to our websites. We may use these logs for internal purposes, such as website administration, optimization and security. We may also use the data for fraud-protection, personalization and ad advertising.

We collect **device identifiers** and other device-related information, including your device’s advertising ID if available. This information is used to identify the device and authenticate you. We may also use device-related information to associate you with different devices that you may use, including for fraud-protection purposes and to better target advertising. In many cases, you can reset your device’s advertising ID. Both Android and iOS devices enable you to reset your device identifier under the “settings” menu.

### V. A Guide to Cookies and Other Technologies

#### Cookies

Cookies are small text files that websites send to your computer or other Internet-connected device to uniquely identify your browser or to store information or settings in your browser. Cookies allow us to recognize you when you return. They also help us provide a customized experience and can enable us to detect certain kinds of fraud.

- First party cookies are those cookies that are placed by Macmillan. These cookies are used by Macmillan and include all the essential cookies.
- Third party cookies are placed by another company, including service providers, social media cookies and third-party advertising companies. Cookies placed by third parties can be read by these third parties when you visit other sites in the advertising network, allowing a profile of your online behavior to be created so that the third party can deliver targeted ads from all its customers.

### **Flash Cookies and Silverlight Cookies**

A Flash Cookie (also known as a Local Stored Object) is a small data file placed on a computer using Adobe Flash technology. A Silverlight Cookie is a small data file placed on a computer using Microsoft's Silverlight technology. Flash and Silverlight are applications that allow delivery of dynamic content, such as video clips and animation. These cookies are used to personalize and enhance your online experience, deliver dynamic content, and for security purposes. They differ from "regular cookies" in that they are not managed using your browser settings. See **Your Choices** above for how to manage these types of cookies.

### **Pixel Tags and Web Beacons**

Pixel tags (also called web beacons) are tiny graphic images and small blocks of code placed on website pages, ads, or in emails that allow us to determine whether you have performed a specific action. When you access the pages or you open an email, the tag lets us know you have accessed the web page or opened the email. These tools allow us to measure response to our communications and improve our web pages and promotions.

### **Server Logs**

Server logs record activities on our websites. Other types of logs collect similar information from our apps. These logs record information about the device you use to access our website, your operating system type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone where your device is located. Our logs also record the IP address of the device you use to connect to the Internet. An IP address is a unique identifier that devices require to identify and communicate with each other on the Internet. We may also collect information about the website you were visiting before you came to our website and the website you visit after you leave our site.

## **4. How We Use The Information We Collect**

We may use the information we obtain to:

- create and manage your account;
- offer and provide products, services and tailored information to you, including email newsletters;
- permit you to participate in blogging, forums, and discussion groups;
- communicate with you about, and administer your participation in, special events, programs, surveys, contests, sweepstakes, and other offers or promotions;
- display content on our Sites, such as stories, product reviews and photos;

- respond to and communicate with you about your requests, questions and comments;
- process claims we receive in connection with our products and services;
- operate, evaluate and improve our business (including developing new products and services; managing our communications; determining the effectiveness of our sales, marketing and advertising; analyzing and enhancing our products, services and Sites; and performing accounting, auditing, billing, reconciliation and collection activities);
- perform data analyses and other processing (including market and consumer research, and trend analysis);
- protect against, identify and prevent fraud and other criminal activity, claims and other liabilities; and
- comply with and enforce applicable legal requirements, relevant industry standards and our policies and where otherwise permitted or required by applicable law.

In addition, we use information collected online through cookies, web beacons and other automated means for the purposes described in the **Cookies and Online Tracking** section above such as: (i) recognizing your computer when you visit the Sites; (ii) tracking you as you navigate the Sites, and to enable the use of any e-commerce facilities; (iii) improving the Sites' usability; (iv) analyzing the use of the Sites; (v) administration of the Sites; and (vi) personalizing the Sites for you, including targeting content and advertisements which may be of particular interest to you. We also use this information to help diagnose technical and service problems, administer our Sites, identify users of our Sites, and gather demographic information about our users. We use clickstream data to determine how much time users spend on web pages of our Sites, how users navigate through our Sites, and how we may tailor our Sites to better meet the needs of our users. See the **Cookies and Online Tracking** section above for more information.

We also may use the information we obtain about you in other ways for which we provide specific notice at the time of collection.

## **5. Information We Share**

We may share the information you provide with companies that are related to Macmillan through common ownership.

We may share your Personal Information with third party partners that provide services to you through our websites, but only to the extent you have a relationship with such partner or you authorize the sharing. For example, you may be able to sign up for programs that allow you to interact with authors (through our Sites or otherwise), and we will share your information with the authors (or others) as needed to fulfill your request. The third party's use of your information is governed by such third party's own privacy policies. Additionally, we may share certain information with third parties for appropriate business purposes, such as to validate referrals and for auditing.

We share personal information with third parties who perform services on our behalf. For example: when you make a purchase, we may share information about you and your transaction with other companies for the purpose of processing your transaction, and we may retain outside companies to manage databases of customer information, to provide advertising services and to distribute e-mail offerings.

Unless you have opted out, we may also share certain information such as your email address with Facebook, Google, Amazon, Twitter, and other third parties so that we can serve targeted ads and content to you and others with similar interests on such third parties' respective sites (see the **Your Choices** section below for more information on how to opt out). These third parties use the data as a

service provider to use to help us target our ads to you and others. This is called custom audiences and matching.

Our Sites may feature blogs, forums, discussion groups and comments. Please be aware that the information you post (including personally identifiable information) in connection with these activities may be made publicly available. In addition, some of our Sites provide for user registration including a user profile. In such case, the following information may automatically be available to all other users of such Site: your display name, your photo (if uploaded), and how long you've been a registered user. In addition, if you've included any optional information in your profile, this information may also be available to all other users.

We may also disclose Personal Information where permitted by law, such as for payment processing, as needed to affect the sale or transfer of business assets, to enforce our rights, including Terms of Use or Service, protect our property, or protect the rights, property or safety of others, or as needed support external auditing, compliance and corporate governance functions. We will also always disclose Personal Information when required to do so by law, such as in response to a subpoena, including to law enforcement agencies and courts in the United States and other countries where we operate.

## **6. Links to Other Websites**

Our Sites may contain links to other websites for your convenience and information. These may include, without limitation, some of the blogs and forums to which you are provided access through the Sites. These websites may be operated by companies not affiliated with us. Linked websites may have their own privacy policies or notices, which we strongly suggest you review if you visit any linked websites. We are not responsible for the content of any websites that are not affiliated with QDT, any use of those websites, or the privacy practices of those websites.

## **7. Children's Privacy**

Our site is intended for a general audience of adult readers and we do not target children under the age of 16.

## **8. How We Protect Personal Information**

We maintain administrative, technical and physical safeguards designed to protect the personal information you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. We have procedures to deal with any suspected data security breach and will notify you and/or any applicable regulator or supervisory authority or other governmental entity where we are legally required to do so.

## **9. Your Choices**

If you receive a marketing email from us, you can follow the unsubscribe link included in each of our e-

mail marketing communications to opt-out of receiving the specific type of marketing email (i.e. a particular e-newsletter) or all marketing emails from Macmillan Trade . Please note that you may continue to receive certain transactional messages from us.

We also give you the option of requesting that we not use your information for marketing purposes, or share your information with related companies for marketing use. [Click here](#) to send us an e-mail with your name and e-mail address(es), if you do not want us to use your information for our marketing purposes, including sharing your email address with third parties to advertise our products or services on such third party sites by using your email address to create custom audiences and matching, or sharing your information with related companies for marketing use. However, if you send us an opt-out e-mail request, PLEASE NOTE that, unless you indicate to us which of our divisions/senders/entities you would like to opt-out of, you will be opted out of marketing use by all off the U.S. Macmillan Trade entities. That means that you will not receive our e-newsletters or information from us about podcasts, books, promotions, and services.

Please be aware that we will process your opt-out only for the specific e-mail address. If you have more than one e-mail address or if you have changed your email address, please resubmit the opt-out request for the other email addresses. If you believe you have opted out, but continue to receive e-mails from us, please contact us by one of the means listed under the **How to Contact Us** section below, and we will investigate the issue.

#### **10. International Transfers**

Your personal information may be transferred to, stored at or processed in the United States and other countries which may not have equivalent privacy or data protection laws. However, regardless of where your personal information is transferred, we will protect it in accordance with this Privacy Notice

**BY CONTINUING TO USE THESE SITES AND/OR SUBMITTING YOUR PERSONALLY IDENTIFIABLE INFORMATION, YOU CERTIFY THAT YOU MEET AGE AND OTHER ELIGIBILITY REQUIREMENTS FOR THE SITE AS SET FORTH IN THIS NOTICE AS WELL AS THE TERMS AND CONDITIONS, AND CONSENT TO COLLECTION, USE, DISCLOSURE, STORAGE AND TRANSFER OF YOUR PERSONALLY IDENTIFIABLE INFORMATION OUTSIDE THE EEA, SWITZERLAND, CANADA, OR ANY OTHER NON U.S. JURISDICTION IN ACCORDANCE WITH THIS NOTICE.**

#### **11. Updates to Our Online Privacy Notice**

Changes to this Privacy Notice will become effective when those changes are posted to the Sites or otherwise notified to you as required by applicable law. Your continued use of the services and the Sites subsequent to any changes to this Privacy Policy constitutes your acceptance of the changes subject to the contents of the specific notification. We indicate the effective date of this Notice (and any updates) at the top of the Notice.

#### **12. How To Contact Us**

If you would like to update your contact information and/or preferences, [click here](#).



If you would like to request to access, update or correct other information in our records in accordance with your rights under applicable law, please contact us as set out below.

If you have any questions about our information practices (or those of our service providers) or our products or services, please contact us at:

[contact@quickanddirtytips.com](mailto:contact@quickanddirtytips.com)

or

Quick and Dirty Tips  
120 Broadway  
25<sup>th</sup> Floor  
New York, NY 10271  
Attention: Digital Marketing Manager

## Important Information for EEA Residents

**QDT is providing this supplemental privacy notice to give individuals in the European Economic Area (EEA) the additional information required by the EU General Data Protection Regulation. These provisions, together with the statements in the QDT Privacy Notice, explain our practices with regard to EEA personal data.**

### **1. Information about Macmillan**

This information is being provided by QDT, a division of:

Macmillan Publishing Group, LLC  
Privacy Office  
120 Broadway, 22<sup>nd</sup> Floor  
New York, NY 10271

**Macmillan is based in the United States. Our representative in the EEA is:**

Macmillan Publishers International Limited  
Company number: 02063302  
Pan Macmillan  
The Smithson  
6 Briset Street  
London, EC1M 5NR.

Att: Legal Department

### **2. The Purposes and Legal Basis for Processing, including Legitimate Interests**

The Macmillan Privacy Notice explains the reasons why we process your Personal Information. We only process Personal Information when we have a legal basis for the processing, such as:

- To provide the products, services or information that you request,
- For closely-related purposes, such as payment processing and financial account management, contract management, website administration, business continuity and disaster recovery, security and fraud prevention, corporate governance, reporting and legal compliance, and
- With your consent (or provided you have not objected, as may be appropriate under applicable law), such to provide you with marketing communications.

We may also process your Personal Information for the purposes of our legitimate interests, provided that such processing shall not outweigh your rights and freedoms. In particular, we may process your Personal Information as needed to:

- Protect you, us or others from threats (such as security threats or fraud) piracy or cheating,
- Comply with the laws that are applicable to us around the world,
- Enable or administer our business, such as for quality control, consolidated reporting, and customer service,
- De-identify it to create anonymized and/or aggregated datasets,
- Manage corporate transactions, such as mergers or acquisitions, and
- Understand and improve our business or customer relationships generally.

We may disclose your Personal Information to related companies and to third parties as described in the Privacy Notice; however, we do not share your Personal Information with third parties for them to market their products or services to you without having obtained your prior opt-in consent. If you give consent for such sharing, you may revoke it at any time.

We do not knowingly collect Personal Information from children under the age of 16 without consent of the parent or guardian.

### **3. Automated Decision-Making and Profiling**

We may use profiling and analytics to understand our customers and readers of our publications and to find potential influencers. For example, we may analyze whether certain types of books appeal to older readers or to women. We will not make automated-decisions about you that may significantly affect you, unless (1) the decision is necessary as part of a contract that we have with you, (2) we have your explicit consent, or (3) we are required by law to use the technology.

### **4. When You are Required to Provide Personal Information to Macmillan**

In most cases, you are not required by law to provide any Personal Information to Macmillan. You are required to provide certain Personal Information if you want to enter a contest, sweepstakes or giveaway or if you want to receive communications or purchase products from us. Our data collection forms indicate which data elements are required. If you do not provide these data elements, we cannot do business with you.

### **5. Your Rights**

As noted in the Privacy Notice, you always have the right to object to our marketing communications. To opt-out of emails, simply click the link labeled “unsubscribe” at the bottom of any email we send you. To revoke permissions that you may have given to send text messages, text STOP in response to any message.

*Macmillan also respects the rights of EEA residents to access, correct and request erasure or restriction of their personal information as required by law. This means:*

- You generally have a right to know whether or not we maintain your Personal Information. If we do have your Personal Information, we will provide you with a copy (subject to the rights of others). If your Personal Information is incorrect or incomplete, you have the right to ask us to update it. In some cases, you may have the right to receive Personal Information that you provided to us back in a machine-readable format.
- You have the right to object to our processing of your Personal Information.
- You may also ask us to delete or restrict your Personal Information.

To exercise these rights, please contact us via email to [contact@quickanddirtytips.com](mailto:contact@quickanddirtytips.com) or write us at the address above, and a member of our Privacy Team will assist you. Please understand that we may need to verify your identity before we can process your request.

If you believe that we have processed your Personal Information in violation of applicable law, you may file a complaint with the Macmillan Privacy Office or with a supervisory authority.

## **6. International Transfers**

Macmillan is based in the United States. As noted in the Privacy Notice, your Personal Information may be stored or processed in the United States and other countries which may not have equivalent privacy or data protection laws. By using our website you consent to these transfers.

## **7. Data Retention**

We will retain your Personal Information for as long as the information is needed for the purposes set forth in Section 2 above and for any additional period that may be required or permitted by law. You may request that we delete your Personal Information by contacting us via email to [contact@quickanddirtytips.com](mailto:contact@quickanddirtytips.com).

Unless we are required by law to retain your information, we will delete it within 30 days of your request.

## **8. How to Contact Us and our Head of Privacy**

Please contact us if you have any questions or comments about our privacy practices or this Privacy Notice. You can always reach us via email to [dataprivacy@macmillan.com](mailto:dataprivacy@macmillan.com). You can also reach us via mail to the addresses given above.

# Important Information for California Residents

**Effective Date: December 31, 2019**

QDT is providing this supplemental privacy notice to give California residents the additional information required by the California Consumer Privacy Act (the "CCPA").

QDT a division of Holtzbrinck Publishing Group, LLC is committed to protecting the privacy and security of all the personal information that is entrusted to us. QDT has a Global Privacy Policy that protects your personal information no matter how or where it is collected, used or stored. QDT also complies with applicable privacy and security laws, including the CCPA. Our [Privacy and Cookie Notice at https://www.quickanddirtytips.com/cookie-and-privacy-policy](https://www.quickanddirtytips.com/cookie-and-privacy-policy) describes our privacy and security practices in detail.

## 1. CCPA Rights

The CCPA provides California residents with specific privacy rights, including the right to receive a privacy notice, the right to know what information we have collected about you during the past 12 months, and the right to know what categories of personal information we have shared with third parties. CCPA gives California residents with the right to opt-out of having their personal information sold.<sup>1</sup> CCPA also gives California residents the right to request deletion of your personal information.

This notice provides information about the categories of information that we collect from California residents generally, the sources of the information, the purposes for which we use the information, and the categories of third parties to whom we disclose the information for business purposes. **Macmillan does not sell personal information.**

As described below, we may share personal information with its Affiliates and service providers. We may also disclose personal information to third parties for business purposes as permitted by in CCPA, such as to our auditors, for compliance or security, or in connection with mergers and acquisitions. We

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<sup>1</sup> Personal information of children under 16 cannot be sold without affirmative consent. Macmillan does not sell any personal information of children under 16.

may also share personal information with third parties based on your consent, such as if you sign-up for author newsletters or co-branded promotions.

## 2. How to Exercise Your Rights

If you are a California resident, you may exercise your rights or authorize another person to act on your behalf by:

- Calling our Customer Service Team at 800-906-9402
- Visiting our CCPA Rights Portal at <https://us.macmillan.com/data-request-form>

Please note that we may need to verify your identity before we can fulfill your request. Because we maintain limited personal information about consumers, generally consisting of email marketing subscription information, we will generally verify your identity using your email address. We will respond to requests using the email address that is associated with the information we maintain.

If you would like to designate an agent, please send an email from your own email address to [dataprivacy@macmillan.com](mailto:dataprivacy@macmillan.com) indicating the name and email address of your agent. We will respond to that's person's requests using both your email address and the agent's email address.

To request deletion of your personal information, please contact 800-906-9402 or [datarights@macmillan.com](mailto:datarights@macmillan.com). Please understand that Macmillan cannot delete personal information in those situations where our retention is required for our Macmillan's internal business purposes or otherwise permitted by CCPA (such as for fraud prevention or legal compliance). In these situations, we will retain your information in accordance with our records retention program and securely delete it at the end of the retention period.

Macmillan does not offer financial incentives for the collection or sale of personal information, although we may offer individuals the opportunity to receive coupons or discounts via email. If you ask us to delete your information, we will not be able to send you additional coupons or discounts via email, however coupons or discounts sent to you previously will continue to be honored according to their original terms. We will not discriminate against you if you exercise your rights under CCPA.

- **CCPA Right to Know Disclosures**

Category and Sources of Personal Information	Representative Data Elements	Purpose for Collecting and Sharing the PI	Categories of Third Parties to whom this type of Personal Information is Disclosed for a Business Purpose
<b>Contact Information</b> We collect this type of information from: <ul style="list-style-type: none"> <li>• You</li> </ul>	Data elements in this category include: <ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> <li>• Mobile number</li> </ul>	We use this type of information to identify you and communicate with you, including: <ul style="list-style-type: none"> <li>• To send transactional messages (such as when</li> </ul>	We may disclose this type of information to our Affiliates and Service Providers, including to social media companies such as Facebook which use the data to

Category and Sources of Personal Information	Representative Data Elements	Purpose for Collecting and Sharing the PI	Categories of Third Parties to whom this type of Personal Information is Disclosed for a Business Purpose
	<ul style="list-style-type: none"> <li>Mailing address</li> </ul>	you sign up for newsletters) <ul style="list-style-type: none"> <li>To send marketing communications, survey and invitations</li> <li>To enable delivery of ads on social media platforms</li> <li>To personalize our communications and provide customer service</li> <li>For our Everyday Business Purposes<sup>2</sup></li> </ul>	identify which of our customers use their platforms so that we can deliver ads to you on the platform, and to: <ul style="list-style-type: none"> <li>Third parties who deliver our communications</li> <li>Other third parties (including government agencies) as required by law</li> </ul>
<b>Government-issued identification information numbers</b>  We collect this type of information from: <ul style="list-style-type: none"> <li>You</li> </ul>	Data elements in this category include: <ul style="list-style-type: none"> <li>Social Security number from individuals as needed to comply with law, such as tax reporting for individuals who win sweepstakes prizes valued at more than \$600.</li> </ul>	We use this type of information: <ul style="list-style-type: none"> <li>To comply with laws regulating sweepstakes</li> <li>For tax reporting</li> <li>For our Everyday Business Purposes</li> </ul>	We may disclose this type of information to our Affiliates and Service Providers and to: <ul style="list-style-type: none"> <li>Our lawyers, auditors, consultants</li> <li>Other third parties as required by law</li> </ul>
<b>Relationship Information</b>  We collect this type of information from:	Data elements in this category include:	We use this type of information:	We may disclose this type of information to our Affiliates and Service Providers and to:

<sup>2</sup> **Everyday Business Purposes** encompasses the Business Purposes (as defined in the CCPA) and following related purposes for which personal information may be used:

- To provide the information, product or service requested by the individual or as reasonably expected given the context in which the personal information was collected (such customer credentialing, providing customer service, personalization and preference management, providing product updates, bug fixes or recalls, and dispute resolution)
- For identity and credential management, including identity verification and authentication, system and technology administration
- To protect the security and integrity of systems, networks, applications and data, including detecting, analyzing and resolving security threats, and collaborating with cybersecurity centers, consortia and law enforcement about imminent threats
- For fraud detection and prevention
- For legal and regulatory compliance, including all uses and disclosures of personal information that are required by law or reasonably needed for compliance with company policies and procedures, such as: anti-money laundering programs, security and incident response programs, intellectual property protection programs, and corporate ethics and compliance hotlines,
- For corporate audit, analysis and reporting,
- To enforce our contracts and to protect against injury, theft, legal liability, fraud or abuse, to protect people or property, including physical security programs
- To de-identify the data or create aggregated datasets, such as for consolidating reporting, research or analytics,
- To make back-up copies for business continuity and disaster recovery purposes, and
- For corporate governance, including mergers, acquisitions and divestitures.

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<ul style="list-style-type: none"> <li>You, such as when you register with us, like our content on social media, visit us a trade show, or sign up for a sweepstakes, contest, or giveaway.</li> <li>We may collect information from social media or other sites when you post it or it is available publicly, such as when you post book reviews</li> <li>We may also infer information about you based on information that you have given us and your past interactions with us. For example, we may identify or accept you as an influencer based on your public postings on social media sites</li> </ul>	<ul style="list-style-type: none"> <li>Personal characteristics, such as your age, age range or gender</li> <li>Country or language preference (when you specify this for email subscriptions)</li> <li>Data from social media profiles, such as Facebook, Twitter, Goodreads and similar platforms</li> <li>Reading interests, including preferred authors, and reviews</li> <li>Marketing preferences</li> </ul>	<ul style="list-style-type: none"> <li>To better understand you and our customers generally</li> <li>To tailor our communications to you</li> <li>To identify prospective customers</li> <li>To identify influencers</li> <li>For internal business purposes, such as quality control, training and analytics</li> <li>For our Everyday Business Purposes</li> </ul>	<ul style="list-style-type: none"> <li>Third parties with whom we have joint marketing and similar arrangements</li> <li>Our lawyers, auditors, consultants</li> <li>Other third parties as required by law</li> </ul>
<p><b>Transaction and Interaction Information</b></p> <p>We collect this type of information from:</p> <ul style="list-style-type: none"> <li>You, when you interact with us, such as entering a sweepstakes, contest or giveaway, content or if you purchase products directly from us</li> <li>Third parties that process transactions for us</li> </ul>	<p>Data elements in this category include:</p> <ul style="list-style-type: none"> <li>Entry information for contests and promotions</li> <li>Customer account information, purchase history and related records</li> <li>Customer service records</li> </ul>	<p>We use this type of information:</p> <ul style="list-style-type: none"> <li>To fulfill our business relationship with you, including customer service and fraud prevention</li> <li>For our Everyday Business Purposes</li> </ul>	<p>We may disclose this type of information to our Affiliates and Service Providers and to:</p> <ul style="list-style-type: none"> <li>Third parties as needed to complete the transaction, including delivery companies, agents, authors and other publishers</li> <li>Our lawyers, auditors, consultants</li> <li>Other third parties as required by law</li> </ul>
<p><b>Online &amp; Technical Information</b></p> <p>We collect this type of information from:</p> <ul style="list-style-type: none"> <li>You and from your computer or devices when you interact with our platforms, websites and applications. For example, when you visit our websites, our server logs record your IP address and other information.</li> </ul>	<p>Data elements in this category include:</p> <ul style="list-style-type: none"> <li>IP Address</li> <li>Device identifiers</li> <li>Web Server Logs</li> <li>First Party Cookies</li> <li>Third Party Cookies</li> <li>Web beacons, clear gifs and pixel tags</li> </ul>	<p>We use this type of information:</p> <ul style="list-style-type: none"> <li>For system administration, including optimizing our websites and applications,</li> <li>For information security and cybersecurity purposes</li> <li>For recordkeeping, including logs and records that are maintained as</li> </ul>	<p>We may disclose this type of information to our Affiliates and Service Providers, including to companies such as Google which use the data collected by cookies and similar means to help us with our online advertising programs, and to:</p> <ul style="list-style-type: none"> <li>Third parties who assist with our information technology and security programs, including</li> </ul>

Category and Sources of Personal Information	Representative Data Elements	Purpose for Collecting and Sharing the PI	Categories of Third Parties to whom this type of Personal Information is Disclosed for a Business Purpose
<ul style="list-style-type: none"> <li>Automatically, via technologies such as first party cookies, web beacons, when you visit our website or other websites.</li> <li>Third parties, including computer security services and advertising partners</li> </ul>		part of Transaction Information <ul style="list-style-type: none"> <li>To better understand our customers and prospective customers and to enhance our Relationship Information, including by associating you with different devices and browsers that you may use</li> <li>For online targeting and advertising purposes</li> <li>For our Everyday Business Purposes</li> </ul>	companies such as network security services who retain information on malware threats detected <ul style="list-style-type: none"> <li>Third parties who assist with fraud prevention, detection and mitigation</li> <li>Third party network advertising partners</li> <li>Our lawyers, auditors, consultants</li> <li>Other third parties as required by law</li> </ul>
<p><b>Audio Visual Information</b></p> <p>We collect this type of information from:</p> <ul style="list-style-type: none"> <li>You</li> <li>Automatically, such as when we record calls to our call center</li> <li>Third parties that provide access to information you make publicly available, such as social media</li> </ul>	<p>Data elements in this category include:</p> <ul style="list-style-type: none"> <li>Photographs</li> <li>Video images</li> <li>CCTV recordings</li> <li>Call center recordings and call monitoring records</li> <li>Voicemails</li> </ul>	<p>We use this type of information:</p> <ul style="list-style-type: none"> <li>For internal business purposes, such as call recordings used for training, coaching or quality control</li> <li>For relationship purposes, such as use of photos and videos for social media purposes</li> <li>For our Everyday Business Purposes</li> </ul>	<p>We may disclose this type of information to our Affiliates and Service Providers and to:</p> <ul style="list-style-type: none"> <li>Our lawyers, auditors, consultants</li> <li>Other third parties as required by law</li> </ul>
<p><b>Financial information</b></p> <p>We collect this type of information from:</p> <ul style="list-style-type: none"> <li>You, if you purchase products directly from us</li> </ul>	<p>Data elements in this category include:</p> <ul style="list-style-type: none"> <li>Payment card information</li> </ul> <p><i>For security purposes, Macmillan does not generally store payment card numbers, CVV codes or expiration dates. These data elements are provided to our payment processors and not retained by Macmillan.</i></p>	<p>Financial information is maintained in our transaction data. We use this type of information:</p> <ul style="list-style-type: none"> <li>For processing payments</li> <li>For risk management, fraud prevention and similar purpose</li> <li>For our Everyday Business Purposes</li> </ul>	<p>We may disclose this type of information to our Affiliates and Service Providers and to:</p> <ul style="list-style-type: none"> <li>Payment processors, financial institutions and others as needed to complete the transactions and for authentication, security and fraud prevention</li> <li>Our lawyers, auditors, consultants</li> <li>Other third parties as required by law</li> </ul>
<p><b>Children’s data</b></p>	<p>Data elements in this category include:</p>	<p>We use this type of information:</p>	<p>We may disclose this type of information to our Affiliates</p>



<b>Category and Sources of Personal Information</b>	<b>Representative Data Elements</b>	<b>Purpose for Collecting and Sharing the PI</b>	<b>Categories of Third Parties to whom this type of Personal Information is Disclosed for a Business Purpose</b>
<p>Our general interest sites do not target children under 16.</p> <p>On our YA sites and at Book Fairs may collect information from children between 13 and 16. . We may also collect information about children under 13 from their parents or guardians or from the children with prior parental consent.</p> <p>We do not collect personal information directly from children under 13 without prior parental/guardian consent.</p>	<ul style="list-style-type: none"> <li>• name</li> <li>• address</li> <li>• email address</li> <li>• age</li> </ul>	<ul style="list-style-type: none"> <li>• Provide the information, products or services requested by the child or by the child’s parent, guardian or school</li> <li>• For our Everyday Business Purposes</li> </ul>	<p>and Service Providers and to:</p> <ul style="list-style-type: none"> <li>• Other third parties (including government agencies) as required by law</li> </ul>
<p><b>Compliance data</b></p> <p>We collect this type of information from:</p> <ul style="list-style-type: none"> <li>• You</li> <li>• Third parties, including companies that help us conduct internal investigations</li> </ul>	<p>Data elements in this category include:</p> <ul style="list-style-type: none"> <li>• Compliance program data, including records to demonstrate compliance with applicable laws, such as sweepstakes laws, and privacy laws</li> <li>• Records relating to complaints and internal investigations, including compliance hotline reports</li> </ul>	<p>We use this type of information:</p> <ul style="list-style-type: none"> <li>• To comply with and demonstrate compliance with applicable laws</li> <li>• For legal matters, including litigation and regulatory matters, including for use in connection with civil, criminal, administrative, or arbitral proceedings, including in anticipation of litigation or enforcement of judgments and orders</li> <li>• For our Everyday Business Purposes</li> </ul>	<p>We may disclose this type of information to our Affiliates and Service Providers and to:</p> <ul style="list-style-type: none"> <li>• Our lawyers, auditors, consultants</li> <li>• Other third parties (including government agencies, courts and opposing law firms, consultants, process servers and parties to litigation) in connection with legal matters</li> </ul>