

# MACMILLAN

This is the privacy policy (“policy”) for the website <https://www.macmillaneducationeverywhere.com> (opens in a new tab)

(and its subdomains) which is run and provided by Macmillan Education Limited, 4 Crinan Street, London, N1 9XW, UK (**we, us** and **our**).

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 section III).
- In case you register for one our services (e.g. content), further personal data will be processed in the scope of such services (see section IV)
- Your personal data may be disclosed to third parties (see section VII) that might be located outside your country of residence; potentially, different data protection standards may apply (see section VIII).
- We have implemented appropriate safeguards to secure your personal data (see section IX) and retain

your personal data only as long as necessary (see section X).

- Under the legislation applicable to you, you may be entitled to exercise certain rights with regard to the processing of your personal data (see section XI).

## **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.

## **III. 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:

- The IP address of the user visiting the MEE Portal
- The website from which you have been directed to our offer
- The date and time of your requests
- 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 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.

#### **IV. Registration for our services**

Our website offers a content and resources access services. In order to use the aforementioned services you have to set up an account. With regard to the registration of an account and its subsequent use, we process:

- Information (such as your first name, last name, country of residence, date of birth and email address) that is provided by registration
- Information in connection with an account sign-in facility (e.g. username and password details)
- Personal information in content you provide on our site
- Educational information, such as your virtual class and grades

The MEE portal provides access to multiple Macmillan Education platforms as well as products by affiliates.

Macmillan Education Limited is not responsible for the data processing in connection with these platforms and products but merely acts as a data processor on behalf of the respective affiliate.

Whenever you complete transactions using our website, e.g. purchasing a publication, further data processing processes may take place, of which you will of course be separately informed.

We will process the personal data you provide to:

- Identify you at sign-in
- Provide you with the services and information offered through the website or which you request
- Administer your account

- Communicate with you
- Profiling

For this, the legal basis is Article 6 sec. 1 sent. 1 lit. b GDPR  
The use of your personal data for profiling is done for the legitimate interest to provide you access to the content and resources that are relevant to you, Article 6 sec. 1 sent. 1 lit. f GDPR.]

Your personal data is, in the absence of exceptions within the specific services mentioned below, retained for as long as your user account is used. After deletion of your account, your personal data will be erased 10 years later. Statutory storage obligations or the need for legal actions that may arise from misconduct within the services or payment problems can lead to a longer retention of your personal data. In this case, we will inform you accordingly.

- **Cookies, Web-beacons**

Providers will be automatically informed about your visit on our website. For such purpose, a web beacon is used to place a cookie on your computer.

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. Depending on the provider your personal data may be transferred to and processed in third countries, e.g. the United States. For further information about the potential risks of a cross border data transfer please refer to section VIII.

It is possible that a provider discloses your personal data to its business partners, third parties or authorities.

You can prevent the installation of such a cookie

- by a respective setting of your browser that blocks the installation of third party cookies,

- by deactivating the provider's interest-related advertising under the link mentioned in the provider details below,
- or generally blocking cookies under e.g. <http://www.google.com/settings/ads/plugin> (opens in a new tab)

Further information about the processing of your personal data in the provider's course of operation is provided by its privacy policy. Moreover, you will be provided with further information with regard to your rights and settings concerning privacy. You can access the provider's privacy policy by following the link in the provider details below.

## **V. Analysis**

For statistical analysis we use web analytics services to collect information about the use of this site.

### **1. General tracking information**

The tools collect information such as

- Device and browser information (operating system information, Mobile device identifier, mobile operating system, etc.)
- IP address
- Page accessed, URL click stream (the chronological order of our internet sites you visited)
- Geographic location
- Time of visit
- Referring site, application, or service

We use the information we get from the providers 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 the tools with personal data.

Depending on the provider the information generated about your use of the website may be transferred to and processed in third countries, e.g. the United States. For further information about the potential risks of a cross border data transfer please refer to section VIII. The tools collect 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.

## **2. DataDog**

DataDog is the web application performance tool for monitoring performance from the end user experience, through servers, and down to the line of application code.

The tools collect information such as

- Device and browser information (operating system information, Mobile device identifier, mobile operating system, etc.)
- IP address
- Page accessed, URL click stream (the chronological order of our internet sites you visited)
- Geographic location
- Time of visit
- Referring site, application, or service

We use the information we get from the providers 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 the tools with personal data.

### **3. Google Analytics / Google Tag Manager**

We use Google Analytics, a web analytics service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (“Google”). On our behalf Google will use the information generated by a cookie for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet activity in connection with the use of the website.

We have activated the IP-anonymisation within the Google Analytics service, and your IP address will be truncated within the area of member states of the European Union or other parties to the Agreement on the European Economic Area. Only in exceptional cases the whole IP address will be first transferred to a Google server in the USA and truncated there. The IP-address your browser conveys within the scope of Google Analytics will not be associated with any other data held by Google.

You may refuse the use of cookies by selecting the appropriate settings on your browser; however please note that if you do this you may not be able to use the full functionality of this website. In addition to that you may prevent the collection of the information generated by the cookie about your use of the website (including you IP address) and the processing of this data by Google if you download and install the browser plug-in available at the following link: <http://tools.google.com/dlpage/gaoptout> (opens in a new tab)

## **VI. Third party content and social media plug-ins**

### **1. Videos from external provider**

We use Brightcove's service in order to play videos directly from 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 Brightcove, Inc. 290 Congress Street, 4<sup>th</sup> Floor, Boston MA 02210, USA. We do not have any influence on Brightcove's data processing activities. Please check Brightcove's privacy policy for further information: <https://www.brightcove.com/en/legal/privacy>

(opens in a new tab)

. Here you can find information about your rights and privacy settings. Your data may be sent to a country outside the EEA. For further information about the potential risks of a cross border data transfer refer to section VIII.

## **2. Links to third party websites**

This website may contain links to third party websites. We are not responsible for the content and the data collection on respective third party websites; please check the privacy policy of respective websites for information of respective websites' data processing activities.

## **VII. Information sharing**

Your personal data will only be disclosed to a third party to the extent necessary to fulfill our contractual relationship. Legal basis for the transfer of your personal data is Article 6 sec. 1 sent. 1 lit. b and f GDPR and represents our legitimate interest to implement our general terms and conditions of business or any other agreements concluded with you.

We provide the option to login with your Google credentials, if you hold a Google profile (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland). When using this



login option, your IP address and eventually other data required by Google for the service will be sent to Google. The deviating data protection regulations of Google Inc. are applicable for this service. For more information about the privacy policy of Google Inc., please visit <https://policies.google.com/privacy?hl=en>.  
(opens in a new tab)

We may disclose anonymous aggregate statistics about users of the website in order to describe our services to prospective partners, advertisers and other reputable third parties and for other lawful purposes, but these statistics will include no personal data.

We may disclose your personal data to following contractors who assist us in providing the services we offer through the website

- Macmillan Publishers India Pvt. Ltd

Such a transfer will be based on data processing agreements. Therefore, our contractors will only use your personal data to the extent necessary to perform their functions and will be contractually bound to process your personal data only on our behalf and in compliance with our requests.

In the event that we undergo re-organisation or are sold to a third party, any personal data we hold about you may be transferred to that re-organised entity or third party in compliance with applicable law.

We may disclose your personal data if legally entitled or required to do so (for example if required by law or by a court order).

### **VIII. 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](https://ec.europa.eu/info/law/law-topic/data-protection_en) (opens in a new tab)

. You can find further information about the aforementioned safeguards by contacting the Group Data Protection Officer via [dataprotection@springer.com](mailto:dataprotection@springer.com).

## **IX. 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.

## **X. 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.

## **XI. 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.

## **XII. 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@springer.com](mailto:dataprotection@springer.com).

The information you provide when contacting us (<https://www.macmillaneducationeverywhere.com/help/> [\(opens in a new tab\)](#))

) 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.

## **XIII. 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 on 24<sup>th</sup> February 2021.**