



PRIVACY POLICY

WHO WE ARE

This policy applies to the processing of your information by **Creature Media Ltd** as data processor for the Real Play Coalition (a partnership formed by Unilever, IKEA Group, The Lego Foundation and National Geographic).

Creature Media Ltd is the publisher of National Geographic Kids magazine in the UK and a company registered in England under company number 07693866 with our registered address as set out below.

You can contact us as follows:

Creature Media Ltd and Creature Media (Pty) Limited

FAO: HEAD OF DATA PROTECTION

Address: Third Floor, 12-14 Berry Street, London, EC1V 0AU

Email: admin@ngkids.co.uk

WHAT INFORMATION WE COLLECT ABOUT YOU

Information you provide

During your interaction with us, whether via our websites, by email, through completion of surveys, use of our app or by any other means, you may provide information to us which might include [such as] your name, address, gender, email address, phone number, birthday, twitter handle, the type of device you use to connect to the internet, and the subjects you are interested in, in order to provide you with information or reply to your queries. Your information includes anything which identifies you so if you provide user generated content to us it may include personal information.

If you provide us with more sensitive information this is known as Special Category ("Sensitive") information and may include details about a person's racial or ethnic origin, political opinions, religious, philosophical or similar beliefs, trade union membership, genetics, biometrics, health, sexual life, sexual orientation or about criminal offences or proceedings. This type of information will be treated differently and we will explain why we are collecting it and it will only be used with your explicit consent.

Protection of Personal Data

You are responsible for ensuring that personal data is transferred to us securely. We will take all reasonable precautions to ensure that all the personal data that is submitted to us for the purposes above remains secure and have procedures to protect the storage and disclosure of personal data. You must ensure passwords are not shared and are kept securely.

Cookies and how you use our website and apps

We also collect certain information about how you use our website and apps and the device that

you use to access them. This includes your IP address, geographical location, device information (such as your hardware model, mobile network information, unique device identifiers) browser type, referral source, length of visit to the website, number of page reviews, the search queries you make on the website and similar information. This information is collected by Google Analytics on our behalf and by some of our apps using cookies. To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>. For more information on cookies please read our Cookies Policy.

Our website may include links to third party websites, plug-ins and applications. By clicking on those links or enabling these connections you may allow third parties to collect or share data about you. We do not control these websites and are not responsible for their privacy notices. Please ensure that you read the privacy notices on any such external websites.

HOW WE USE INFORMATION ABOUT YOU

We use your information lawfully. We do not sell your information to third parties. However we may share your information as set out in the section '[When We Share Your Information](#)'. The details of how we use your information and the legal bases for our use are set out below: We may use such personal data collected to:

- process your request, for example, to access services
- communicate with you and provide information about our products and services
- send you marketing communications about products, services, activities, promotions or other matters that we feel may be of interest or use to you
- contact you about services you have subscribed to
- if you are a school, communicate with you and your school to provide Support services to resources on our site
- analyse your use of our websites, our apps and response to our communications and improve the services we offer, including personalising our communications with you.

When we have your consent to contact you, we may use your information to:

- keep in contact with you and provide you with marketing communications about our news, resources or products published by The Real Play Coalition;
- tell you about new website features or services;
- send you newsletters.

In the following circumstances we will use your information to carry out our contract with you:

- to provide customer service and support.

Sometimes we will use your information on the basis of our 'legitimate business interests' (legitimate interests). This means our legitimate interests in conducting and managing our business and our relationship with you.

Where we use your information for our legitimate interests, we make sure that we take into account any potential impact that such use may have on you, particularly where we process children's personal data. Our legitimate interests don't automatically override yours and we won't use your information if we believe your interests should override ours unless we have other grounds to do so (such as your consent or a legal obligation). If you have any concerns about our processing you have rights and choices which include the right to object (please see the section headed '[Your Rights and Choices](#)').

We may use your information for the purposes listed below on the basis of our legitimate interests:

- to contact you about submissions you made or content you provided to us;
- to respond to your queries and correspondence;
- to collect and store accurate data of our customers;
- to administer your account with us;
- to deal with enquiries or complaints as necessary to provide customer support in providing the correct products and services to our website users;
- to carry out aggregated and anonymised research about general engagement with our website in providing the right kinds of products and services to our website users;
- to analyse your use of our websites and app and your responses to our communications;
- to personalise, enhance, modify or otherwise improve the services and/or communications that we provide to you;
- to detect and prevent fraud and unauthorised access or illegal activity;
- to improve security and optimisation of our network sites and services including trouble shooting, testing and software development and support;
- to operate a safe and lawful business or where we have a legal obligation;
- to enable us to comply with our policies and procedures and enforce our legal rights, or to protect the rights, property or safety of our employees;

WHO CAN SEE YOUR INFORMATION?

Your information may be processed by our staff or by the staff of third parties we work with to deliver our business. Processing can mean any activity that involves the use of information about someone that can identify them. All uses, for example, obtaining, recording, storing, disclosing, organising, retrieving, deleting and destroying are types of data processing. We take measures to ensure that third parties processing your information on our behalf are acting lawfully in accordance with our instructions and are subject to appropriate confidentiality requirements. We also have adequate technical and organisational safeguards in place in our company and with third party processors to protect your information. Third party processors of your information include:

- our website hosts and operators, IT support providers, database operators, site analytics providers and software developers;
- our customer support team;
- our marketing or publicity services providers;
- our financial services;
- our auditors, technical consultants and legal advisors;
- our fraud detection services;

WHEN WE SHARE YOUR INFORMATION

We share your information within Creature Media Ltd and our partner third companies (see How We Use Information About You/Who Can See Your Information) in order to process it legally. Where we share your information outside our company you will be asked to consent to a third party sharing your information and if you choose to give your permission any interaction you have with a third party is governed by their privacy terms. The third party becomes a joint data controller of your information with us. This means that the third party can make decisions about how to use your information. Before we share your information, we require third parties to enter into a data sharing agreement which stipulates that they must maintain appropriate security to protect your information from unauthorised access, processing or use.

HOW WE LOOK AFTER YOUR INFORMATION

We look for opportunities to minimise the amount of personal information we hold about you. Where appropriate we anonymise and pseudonymise your information. We use appropriate technological and operational security measures to protect your information against any unauthorised access or unlawful use, such as:

- ensuring the physical security of our offices, warehouses or other sites;
- ensuring the physical and digital security of our equipment and devices by using appropriate password protection and encryption;
- maintaining a data protection policy for, and delivering data protection training to, our employees;
- limiting access to your personal information to those in our company who need to use it in the course of their work and ensure it is kept behind a user password verification system.

You are responsible for ensuring that any passwords you create to access information on our website are not shared and are kept securely.

HOW LONG WE KEEP IT FOR

We will retain your information for as long as is necessary to provide you with the services that you have requested from us or for as long as we reasonably require to retain the information for our legitimate interests, such as for the purposes of exercising our legal rights. We operate a data retention policy and look to find ways to reduce the amount of information we hold about you and the length of time that we need to keep it. For example:

- we archive our email and paper correspondence regularly and destroy unnecessary information;
- We operate a best practice email retention policy requiring password protected folders and departmental shared drives to provide restricted access to information;
- We conduct regular access reviews to keep access profiles and policies up to date;
- We conduct periodic review and purge cycles of documents in accordance with our document retention policy;
- we retain information relating to customer queries for approximately 5 years;
- we maintain a suppression list of email addresses of individuals who no longer wish to be contacted by us. So that we can comply with their wishes we must store this information permanently;

INTERNATIONAL TRANSFERS OF YOUR INFORMATION

The Real Play Coalition is based in the UK.

Whenever we transfer your personal information out of the European Economic Area (EEA) we will take all steps necessary to ensure that it is adequately protected and processed in accordance with this Privacy Notice by using all appropriate cross-border transfer safeguards such as:

- by entering into the European Commission's Standard Contractual Clauses with the provider which give personal data the same protection it has in the EEA; and
- where the provider is in the US, the EU-US Privacy Shield if the provider is part of the EU-US Privacy Shield Framework.

Please contact us if you would like additional information on the specific means used by us when transferring your personal data outside of the EEA.

YOUR RIGHTS AND CHOICES

Your Right to Object

You have the right to object to our using your information for direct marketing and on the basis of our legitimate interests (refer to 'How We Use Your Information' above to see when we are relying on our legitimate interests).

Your Right to Withdraw Consent

The right to withdraw your consent for our use of your information in reliance of your consent 'How We Use Your Information' to see when we are relying on your consent.

Your Other Rights and Choices

You also have other choices and rights in respect of the information that we hold about you, including:

- the right to request access to the information that we hold about you to check that we are acting lawfully;
- the right to receive a copy of any information we hold about you in a structured, commonly-used, machine readable format or in another format of your choice;
- the right to request that we transfer your information to another service provider in a structured, commonly used, machine-readable format;
- the right to ask us to correct information we hold about you if it is inaccurate or incomplete;
- the right to ask us, in certain circumstances, to delete information we hold about you;
- the right to ask us, in certain circumstances, to restrict processing of your information.

You can also prevent processing for marketing activities by checking certain boxes on forms that we use to collect your data to tell us that you don't want to be involved in marketing.

Your Right to Complain

Please contact us if you have any questions or are unhappy about the way your information is used. We hope we will be able to resolve any problems or issues you may have.

You also have the right to lodge a complaint about us and our use of your information to the UK Information Commissioner's Office (<https://ico.org.uk/>) or the relevant authority in your country of work or residence;

CHANGES TO THIS PRIVACY NOTICE

We may make changes to this Privacy Notice from time to time. We will post any changes to our site.

This Privacy Notice was updated on 25 May 2018.

COOKIES POLICY

What are cookies?

When you visit our website (www.realplaycoalition.com) we may send your browser a cookie. A cookie is a small file placed on your computer or mobile phone's browser that helps us recognise you when you return to our website and can tell us whether or not you've visited the site before. Your browser will tell us if you have these cookies, and if you don't, we may generate new ones. Cookies contain information which is transferred to your computer's hard drive.

The information we collect allows us to better tailor our web experience to the interests of our visitors. This information may be used in aggregate form by Creature Media to assess general user interest in our site and the content on it. No personally identifying information is included in this type of reporting.

How to disable cookies

You can set your browser to refuse all or some browser cookies or to alert you when a website sets or uses cookies. You can disable cookies from our site at any time – all modern browsers allow you to change your cookies settings, and these settings will typically be found in the 'options' or 'preferences' menu of your browser. Please note, this may prevent areas of a website from working as intended.

To find out more about cookies, including how to see what cookies have been placed on our website and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.

Find out how to manage cookies on popular browsers:

- Google Chrome
- Microsoft Edge
- Mozilla Firefox
- Microsoft Internet Explorer
- Opera
- Apple Safari

Types of cookies

Essential cookies: these are required for us to operate the website. They include cookies that permit you to store items in an online shopping cart; allow you to log into secure parts of our site or make use of e-payment services.

Analytical/performance cookies: They allow us to recognise you and to count the number of visitors to our website and to see how visitors move around our website; it improves the performance of our website by ensuring that visitors can find what they

are searching for easily and to speed up your searches. Google Analytics and Hotjar cookies are enabled on our website by default, but do not collect any personally-identifiable data about you.

Analytics & data collection cookies: Our website uses third party technologies to help us gather aggregate information about the user experience. The Site uses analytics tools (Google Analytics). Because of this, the web browsers used by our visitors automatically send certain information to Google. This includes, for example, the web address of the page that you're visiting and your IP address. Google may also set cookies on your browser or read cookies that are already there. We do not share any of this information with any other third parties.

Functionality cookies: these allow us to recognise you when you return to the website after your first visit. It helps us to personalise content, to greet you by name and remember your preferences (such as language or country). They are used for statistical purposes.

If you do not agree with the described use of the cookies on this website or app and do not wish to disable cookies, we respectfully ask that you do not use this website.

To find out more about how we use, store and protect your data, please see our Privacy Policy.