



Privacy Policy

1. Houtschild's Commitment To Your Privacy

Houtschild Internationale Boekhandel B.V. (**we, us**) are committed to protecting and respecting your privacy.

This policy (together with our [Terms of Use](#) and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting any of our websites (houtschild.com; houtschild.nl), opening an account with us and/or providing your personal information to us you are accepting and consenting to the practices described in this policy.

For the purpose of the General Data Protection Regulation (GDPR) the data controller is Houtschild Internationale Boekhandel B.V., Sir Winston Churchilllaan 281, NL-2288 DA Rijswijk. VAT number: NL006859926B01, Trade Register The Hague: 27106535.

2. Personal Data

A. What Personal Data Do We Collect?

The type and quantity of information we collect and how we use it depends on why you are providing it. Personal Data is information or pieces of information that could allow you to be personally identified.

We may collect and process data about you including the following:

- Your name;
- Address;
- E-mail address;
- Phone number and financial account, credit and debit card information when you make a purchase or call our customer service number;
- Technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version,
- time zone setting, browser plug-in types and versions, operating system and platform, device information;
- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page;
- Information collected through cookies, Location information;
- Demographic information and other information provided by you.



Privacy Policy

B. How Do We Collect Personal Data?

We and our suppliers may collect Personal Data in a variety of ways including:

- **Automatically via our sites:** You may provide us with data about you by filling in forms on our site, making orders and using the site – this includes information you provide when you search for a product, place an order or register to our site and when you report a problem with our site;
- **Automatically via email:** We may collect Personal Data from you when you telephone or email, such as, but not limited to, our customer service team.
 - **Emails** – we retain emails to support the fulfilment / resolution of your request / enquiry. Emails are routinely archived.
- **Directly from you:** When voluntarily providing information via online forms on our sites or any other mechanism that may be used from time to time.
- **From third parties:** We work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, social networking platforms, analytics providers, public databases, search information providers, credit reference agencies) and may also receive information about you from them. We are not responsible for the privacy, information or other practices of any third parties from which information is received and you should review their policies and practices to ensure you are happy with how they treat your data.
- **Automatically via your browser or device:** Certain information is collected by most browsers or automatically through your device. This may include your device location. We use this information for statistical purposes as well as to ensure that the site functions properly;
- **Automatically via server log files:** Your "IP Address" is a number that is automatically assigned to the computer or device that you are using by your Internet Service Provider (ISP). An IP Address is identified and logged automatically in our server log files whenever a user visits the site, along with the time of the visit and the page(s) that were visited.

C. How do we Use Personal Data?

There are several ways in which we use your information. For transparency, we have split this into those which are active by default and those which you can choose to opt in to:

Occurs By Default:

- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us, communicate with you regarding your purchase and respond to your questions and comments;
- To process payment. All financial, credit and debit card information is handled according to Payment Card Industry Data Security Standard (PCI-DSS) compliant rules and processes. We do not store any credit card information and in the few cases where credit cards are used, this information is taken over the phone, processed immediately and not stored.
- As part of our efforts to keep our site safe and secure, and to support fraud protection. To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes and to send administrative information to you, for example changes to our terms, conditions and policies.



Privacy Policy

- As we believe to be necessary or appropriate: (a) to comply with applicable laws, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

Requires you to opt-in:

- New Title Service - To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

D. Disclosure Of Your Information

Houtschild Internationale Boekhandel B.V. is part of the Bertram Group. We may share your Personal Information with any member of our Group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors who provide services to us (such as credit card processing services, order fulfilment, analytics, site management, information technology and related infrastructure provision, customer service, auditing, and other similar services). When we share Personal Data with such third party providers we require that they use your Personal Data to the extent necessary for providing services to us (or you, as the case may be) and not for their own marketing purposes;
- Analytics and search engine providers that assist us in the improvement and optimisation of our site;
- To prospective buyers, in the event that we sell any business or assets, in which case we may disclose your personal data to the prospective buyers of such business or assets. All customer data held by us is considered the property of Bertram Group;
- In the event that Houtschild Internationale Boekhandel B.V. is acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets; and
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our [Terms of Use](#) or to protect the rights, property, or safety of Bertram Group, our customers, or others.

3. Storage and Security

- All Personal Data you provide us with is stored on our secure servers.
- All interactions with our website, including payment transactions, will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.



Privacy Policy

- Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.
- The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers; this includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services.
- By using our site, you acknowledge and consent to the potential transfer, processing and storage outside of the EEA. You should be aware that many countries outside the EEA do not afford the same legal protections to Personal Data as countries within the EEA. Transfers will be made in accordance with the applicable legislation and we will take reasonable and necessary measures (so far as it is within our control to do so) to ensure that third parties involved will provide an adequate level of protection.

4. Access, Modification and Choices

- We aim to give you as many choices as possible regarding our use and disclosure of your Personal Data.
- You have the right to ask us not to use your personal data for marketing purposes. The easiest way to do so is by clicking the link provided at the bottom of any one of our emails in order to unsubscribe. To find out more about the ways in which you can opt-out please [Contact Us](#).
- Please note that changes to our use of your Personal Data may not be effective immediately. We will endeavour to comply with your request(s) as soon as reasonably practicable and in no event later than 30 days after we received your request. Please also note that if you do opt-out of receiving marketing-related messages from us, we may still send you important administrative messages.
- When you order from us, we will send you administrative emails relating to that order. These include but are not limited to: a confirmation of your order, notification of dispatch, and tracking information. If you receive an email confirmation of an order you did not place please contact us.
- You have the right to access, change and/or delete Personal Data we hold on you. Your right of access can be exercised in accordance with applicable laws.
- We will try to comply with your requests as soon as reasonably practicable and within a maximum of 30 days. If your request is more complex, will we provide an update within 30 days, and aim to comply within a maximum of 90 days. Please note that despite our efforts, there may be residual information that will remain within our databases and other records, which will not be removed or changed immediately.
- Further, please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting such change or deletion (e.g. when you make a purchase or enter a promotion, you may not be able to change or delete the Personal Data provided until after the completion of such purchase or promotion).
- The consequences of choosing not to provide your Personal Data that we request from time to time are that we may not be able to deliver the goods or services you have requested, fulfil your orders or carry out our obligations under any contract between you and us. Please [Contact Us](#) if you would like to understand more about your options.



Privacy Policy

5. Third Party Sites

- This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site where the site contains a link to the Houtschild Internationale Boekhandel B.V. websites. The inclusion of a link on any of our sites does not imply endorsement of the linked site by us.
- We are also not responsible for the collection, usage and disclosure policies and practices (including the data security practices) of other organisations, such as Facebook, Apple, Twitter, Google, Microsoft or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any Personal Data you disclose to other organisations through or in connection with apps or social media that we choose to develop in future.

6. Retention Period

We will retain your Personal Data only for the period necessary to fulfil the purposes outlined in this Privacy Policy. Retention periods vary depending on:

- Legal obligation, such as the need to retain financial transaction data in our finance system for 10 years. The minimum set of Personal Data (such as contact details) will be retained alongside this in order to assist in any queries that may surface during this period. Where there is a conflict between legal obligations and your right for your data to be deleted, the legal obligation will take priority, and this will be explained at the time.
- Commercial need, such as ensuring we can contact you should there be any outstanding orders or payments.

After a retention period in each system for each purpose has elapsed, the data is either anonymised or deleted. Please also note section 4 of this Privacy Policy (Access, Modification and Choices).

7. Children's Personal Information

- All customers need to be over 18 years of age in order to purchase books from us. We do record personal information of children.

8. Sensitive Information

- We generally ask that you do not send us, and you do not disclose, any sensitive Personal Data (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health or medical condition, criminal background or trade union membership) on or through the site or otherwise to us. If you believe that we have mistakenly or unintentionally collected sensitive Personal Data through our channels please [Contact Us](#) immediately.

9. Changes To Our Privacy Policy

- Any changes we may make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the site. Your continued use of the site following these changes means that you are deemed to accept the revised Privacy Policy.



Privacy Policy

10. Contact

As stated in the sections above, you have various rights with regard to your Personal Data including the right to tell us if you:

- Do not want to be contacted in the future by us;
- Would like to find out what information we have about you, would like a copy of the Personal Data which we hold about you;
- If you think that any Personal Data we hold about you is inaccurate, incomplete, out-of-date or irrelevant; and
- Wish to report any breaches of the Privacy Policy.

If you have any questions or complaints about this Privacy Policy, please [Contact Us](#). We will investigate any complaint, and notify you of our decision in relation to the complaint, as soon as practicable after it is received.

If we are unable to satisfactorily resolve your concerns about our handling of your Personal Information, you can contact the

- Dutch Data Protection Authority ([Dutch DPA](#)), Phone: +31 (0)70 888 85 00