

# **POCKETBOOK E-READER'S PRIVACY NOTICE**

The revised privacy policy will be effective starting on May 25, 2018

## **INTRODUCTION**

Welcome to the PocketBook e-reader's privacy notice.

PocketBook e-reader's respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you use your PocketBook e-reader when it is connected to Wi-Fi and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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## **1. IMPORTANT INFORMATION AND WHO WE ARE**

### **PURPOSE OF THIS PRIVACY NOTICE**

This privacy notice aims to give you information on how Pocketbook International SA collects and processes your personal data through your use of your e-reader under the brand PocketBook ("Reader"), including any data you may provide through Reader or by using other services of Pocketbook International SA or our partners. We also own, operate and offer related services, like Bookland, Readrate, Sent to PocketBook, Cloud and Support for e-readers. We refer to Readers, together with our other services as ("Services") in this policy. Services are part of the PocketBook Group Services and Products, which belong to PockeBook International SA, based in Lugano,

Switzerland. More information about PocketBook International SA is available at <https://www.pocketbook.ch>

The Services are not intended for children under 16 and Pocketbook International SA do not knowingly collect data relating to children. Users must be at least 16 years old or older to register for a Services Account to use the PocketBook Services. If a parent or guardian believes that Pocketbook International SA has in its database the personal information of a child under the age of 16, please contact us at [privacy@pocketbook-int.com](mailto:privacy@pocketbook-int.com) and we will use our best efforts to remove the information from our records.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

If you do not agree with this policy, do not access or use our Services or interact with any other aspect of our business.

## **CONTROLLER**

Pocketbook International SA is the company which produces e-readers under the brand PocketBook (“Products”).

Pocketbook International SA is the controller and responsible for your personal data (collectively referred to as “PocketBook”, “we”, “us” or “our” in this privacy notice).

If you have any questions about this privacy notice, including any requests to exercise your legal rights under the GDPR, please contact us by email [privacy@pocketbook-int.com](mailto:privacy@pocketbook-int.com).

## **CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

This version was last updated on May 25, 2018.

The data protection law in the European Union will change on 25 May 2018. By this privacy notice we want to ensure you that we are working on our Services to make them compliant with the requirements of GDPR.

Although privacy notice of PocketBook sets out most of your rights under the new laws, we may not yet be able to respond to some of your requests in all our Services (for example, a transfer of your personal data) until end of 2018 as we are still working towards getting our systems ready for some of these changes

We may revise the provisions of this Privacy Notice as necessary. The latest version of the Privacy Notice will govern the terms of use of your personal data by us and it will always be published at <https://www.pocketbook-int.com/int/legal/GDPR>

## **THIRD-PARTY LINKS**

Readers may have links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites, plug-ins and applications and are not responsible for their

privacy statements.

## 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

PLEASE NOTE THAT READER ITSELF DO NOT COLLECT ANY KIND OF PERSONAL IDENTITY, CONTRACT, FINANCIAL, TRANSACTION DATA ABOUT YOU THROUGH READER.

When you connect to Wi-Fi from your Reader we can collect such non identified information concerning the Reader:

- **Technical Data** your login data, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our Reader. By Usage Data we mean: how you use your book library, information concerning which bottoms on the e-reader you click, which you do not, how often do you use bottoms, turning on/ off the device, setting font options, changing the interface language, sending archive, changing the library settings, setting the read mode. We collect these information to make our Services better for the end-customers. Understanding of your usage preference give us the opportunity to develop and produce better Readers, which will have higher reliability, usability, compressed functionality and extremely easy startup.

### PLEASE NOTE!

In case you are using any of our additional Services, which collect Personal data please read their Privacy notices:

1. PocketBook Reader application iOS/Android
2. Bookland
3. ReadRate
4. Cloud

## 3. HOW IS YOUR DATA COLLECTED?

We use **Automated technologies or interactions** as the method to collect data from and about you. As you interact with our Reader, we may automatically collect Technical and Usage Data about your Reader. This is non identified information, which can be collected from your Reader only if you connect to Wi-Fi.

## 4. HOW WE USE YOUR PERSONAL DATA

Reader itself does not collect any personal data. Only in case you login through it to our other Services listed in [Section 2 The data we collect about you](#) Services will collect your Personal

Data.

## PURPOSES FOR WHICH WE WILL USE YOUR DATA

We have set out below, in a table format, a description of all the ways we plan to use data we collect from your Reader, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

NOTE that we do not collect any personal data if you use only Reader without use of any from our Services.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To use data analytics to improve our Reader and make your reading experiences better	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our Readers updated and relevant, to develop our business)
To make you book recommendations	Usage	Necessary for us to make you your personalized recommendation for your book preferences.

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We do not collect person-identified data via Reader that's why we do not disclosure it to anyone.

## 6. INTERNATIONAL TRANSFERS

PocketBook is a worldwide company, which collect information globally and we primarily store that information in the Netherlands. By using Services, you authorize us to transfer and store your information outside your home country, for the purposes described in this policy. The privacy protections and the rights of authorities to access your information in these countries may not be the same as in your home country.

We take additional measures when information is transferred from the European Economic Area (EEA). This includes having standard clauses approved by the European Commission in our contracts with parties that receive information outside the EEA. We also rely on European Commission adequacy decisions about certain countries, as applicable, for data transfers to countries outside the EEA.

## 7. DATA SECURITY

We have put in place appropriate security measures to prevent your data from being accidentally

lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. DATA RETENTION

### HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your data, the purposes for which we process your data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. As a user of our web-site you have such rights:

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please [\*Contact us\*](#) and write about your request.

**NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. GLOSSARY

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best Products and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by *Contacting us*

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **THIRD PARTIES**

#### **INTERNAL THIRD PARTIES**

Other companies in the PocketBook Group acting as joint controllers or processors and who are based EEA and outside of EEA and provide IT and system administration services and undertake leadership reporting.

**Support** means the provision of end-customer support via telephone or email to customers before, during and after a purchase of products and services under the brand PocketBook.