

# Lend-Items Privacy Policy

NovaTel Systems Ltd (NovaTel) is the provider of the Lend-Items Service.

Last updated 12th December 2018

## Introduction

Lend-Items is committed to the protection of the privacy of all our customers. Your privacy is really important to us and we understand how important it is to you. Our aim is to be as clear and open as possible about what we do with your personal data and why we do it.

This Privacy Policy relates to the way in which your personal information gathered through this Site or through your use of the Service, is dealt with. By using the Service or accessing the Site, you agree to the Privacy Policy set out here. We do not make any representations about third party websites that may be linked to this Site or Service.

Lend-Items is a service provided by NovaTel Systems Ltd. This Privacy Policy ("Privacy Policy") is specific to Lend-Items and may contain different information to that in the Novatel Systems statement. This is due to the specific services and software uniquely provided by Lend-Items. This Policy sets out the obligations of NovaTel Systems Ltd, a company registered in the United Kingdom under number 03599526, whose registered office is at Third Floor Scottish Mutual House, 27-29 North Street, Hornchurch, Essex, RM11 1RS ("the Company") regarding data protection and the rights of customers ("data subjects") in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation.

## Data we collect on you

The types of personal information we may collect from you include;

- your name;
- your email address;
- your phone number;
- your address;
- your image;
- your preferences and settings;
- library name and your organization website
- contact information of your organization
- books and items in your library;
- borrowing and lending activity;
- remarks, comments, and notes;
- information you provide through support and emails;

## How do we use your personal information?

We use your personal information to correspond with you and to process your requests for our services. We do not sell, trade or rent your personal information to any other organizations or companies, without first obtaining your consent, unless required to do so by law. We may disclose the information to our subsidiaries or partner companies that help us provide services to you. We may disclose this information when responding to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. If necessary, we may use this information to investigate, prevent, or take action against illegal activities, suspected fraud, potential threats to safety and security, violations of our Terms of Use, or otherwise. We may be required to transfer personal information if we are acquired by or merged with another company. You should also be aware that courts of equity, such as bankruptcy courts, might have the authority under certain circumstances to permit personal information to be shared or transferred to third parties without permission.

At this time Lend-Items is only available to users who are at least 13 years old. If you are under 13, please do not use the Lend-Items web application.

Lend-Items may collect information about the use of your account, such as how much storage you are using, how often you log in, and other information related to your use of the Lend-Items web application. We use this information internally to deliver the best possible service to you, such as improving the Lend-Items user interface.

We may share with third parties certain pieces of aggregated, non-personal information, such as how many users clicked on a particular advertisement. Such information does not identify you individually.

In order to invite others to become users of your library in Lend-Items, you will enter their email address. This information will be used by Lend-Items to send an invitation email to the new user providing a means for them to verify their identity. Information about this new user will be covered by the same terms of this Privacy Policy as cover your own personally identifiable information.

When you access the Lend-Items web application, the Lend-Items servers automatically record information that your browser sends whenever you visit a website. These server logs may include information such as your web request, Internet Protocol address, browser type, browser language, the date and time of your request, and one or more cookies that may uniquely identify your browser. This information may be used to analyze overall trends to help us improve the Lend-Items service. The linkage between your IP address and your personally identifiable information is never shared with third-parties without your permission or except when required by law.

When you send an email or other communications to Lend-Items support, we may retain those communications to process your inquiries, respond to your requests, and improve our web application.

If you sign up for a paid plan, Lend-Items will use a third-party intermediary (presently PayPal) to manage credit card processing. For information about how they manage your credit card details and personal information, please refer to that party's Privacy Policy.

## What is our lawful basis of using your information?

If you have subscribed to use the Lend-items application processing is necessary to perform and manage your account. We may need to communicate with you about; a technical issue or bug within the software that affects you, any security-related matter, new features, and functionality added to the application, or changes to existing functionality, and generally for good governance and accounting, for market research, analysis and developing statistics.

## Where is your data stored?

The Lend-Items application is run in the Google Cloud using Google Apps Engine and Google Cloud Datastore. The Google data center being used is in US Central (Iowa) region. In addition, each library uses its own data partition eliminating the possibility of transference of data between libraries.

## Sharing your information

The information we hold about you will be treated as strictly confidential and we will only share your data with third parties with your prior consent, or unless required to do so by law.

## Security of Personal Data

Lend-Items is committed to protecting the security of your personal information. We employ industry-standard security measures to protect the loss, misuse, and alteration of the information we collect.

Users of Lend-Items are required to log in using either Lend-Items authentication or their chosen authentication provider account, such as Google Apps, Gmail, Facebook, etc. These authentication providers make available certain account information to Lend-Items for use such as your email address. To modify any of your authentication provider's account information, please use the means provided by that provider. Lend-Items is not affiliated with any of these authentication providers and does NOT have access to, nor does it store your account password.

## How long do we keep your information?

We keep data in accordance with the guidance set out by the GDPR. We endeavor to maintain only data that is relevant, accurate and up to date. You are responsible for keeping your account contact details up to date (managed by an Administrator of a library). We have internal processes to periodically review the data we hold and delete data that is no longer relevant to our purpose for processing.

## Cookies

Cookies are small files saved to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website.

We may use cookies to remember personal settings you have chosen at our website. In no other context do we use cookies to collect information that identifies you personally. Most of the cookies we set are automatically deleted from your computer when you leave our website or shortly afterward.

When you visit the Lend-Items web application, we send one or more cookies to your computer that uniquely identifies your browser. Lend-Items uses cookies to improve the quality of our web application by storing user preferences and tracking user trends. Lend-Items may also use cookies in its advertising services to help advertisers and publishers serve and manage ads.

The application and website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information.

Users can instruct their browsers to refuse all cookies or to indicate when a cookie is being sent. However, if cookies are not accepted, Users may not be able to use some features within the service or website.

## Communications

From time to time, Lend-items may contact users with service updates, newsletters, marketing or promotional materials and other information. Users can Opt-Out at any time.

## Your rights

Unless subject to exemption under GDPR, you have the following rights with respect to your personal data;

**The right to access:** You have the right to request a copy of the personal information we hold about you.

**The right to rectification:** We want to make sure your personal information is accurate, complete and up to date. You have the right to ask us to correct any personal information we have about you which does not meet this standard.

**The right to erasure:** You have the right to ask us to delete personal information we hold about you, in other words, the right to be forgotten.

**The right to object to processing:** You have the right to object to how we may use your information and ask us to stop using the personal information unless there is an overriding legitimate reason to continue.

**The right to restrict processing:** In some cases, you may ask us to restrict how we use your personal information. An example could be where there is no longer a basis for using your personal information but you do not wish us to delete your data.

**The right to data portability:** Should you decide to move to another Service Provider, you may ask us for a copy of your data so that this can be used with the other Service.

**The right to withdraw consent:** Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purposes for which consent was given.

**The right to complain:** If you feel we have used your information incorrectly or without lawful basis you have the right to lodge a complaint with the Information Commissioner's Office (ICO).

## Changes to our Privacy Policy

NovaTel may change this Privacy Policy from time to time and will post any Privacy Policy changes on this website. The changes will take effect as soon as they are posted. We may also notify you by posting an announcement on our website or send you an email. Your continued use of the Site or Service constitutes your agreement to be bound by such changes. Your only remedy, if you do not accept the terms of this privacy policy is to discontinue use of the Site or Service. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account.

## Contact

If you have any questions or concerns regarding privacy on our Website, please send us a detailed message at [support@lend-items.com](mailto:support@lend-items.com).