**MOONDOG BOOKS PRIVACY POLICY**

eBookadabra is provided by Moondog Books Limited (“Moondog”, “we”, “us”, “our”). Thank you for chosing us as your children's subscription reading service.

**1. Introduction**

1.1 We are committed to protecting and respecting your and your children's privacy. This Privacy Policy (together with our **Terms and Conditions of Use**) explains how we will treat your personal information. It explains what information we collect from you, how we use it and who we share it with.

1.2 When you accept our Terms & Conditions you give your express agreement to the use of your information as explained in this Privacy Policy and to our **Terms and Conditions of Use** (together the "Terms & Conditions") before you subscribe to or use our Service. If you don’t agree with the Terms & Conditions, then please don’t use the Service.

1.3 Although the Service is for the benefit of all the family the Terms & Conditions are between us and the adult subscribing to the Service.

**2. Collection Of Personal Information**

2.1 We may collect, store and use the following personal information: (a) information that you provide when you register and/or pay for the Service, or when opting in to our email notifications and/or newsletters, such as your name, email address, user name and password; (b) information that you provide regarding your child so that we can tailor the Service to suit his or her preferences, such as your child's gender, date of birth, favourite book genre and language preferences; (c) information on the way you and your child use our Service, such as how many times you or your child visits our Service, the timing, frequency and duration of each visit, the specific pages visited, stories read, functionality or games used, navigation paths and language preferences; (d) User Content (as defined in the Terms and Conditions of Use) that you specifically consent to being made more widely available to other subscribers at the time you post it; (e) information relating to your type of subscription; (f) technical data, which may include the URL you arrive from, information about the devices you use to access our Service (including the type of device and unique device ID), your IP address, browser type and version and operating system; (g) geographical location information; (h) information that you supply when reporting a problem with the Service; (i) information you choose to supply in response to a call for feedback; and/ or (j) any other information that you choose to send to us. For example - if you contact us, we may keep a record of our correspondence. We may use cookies to collect some of this information and you can learn more about this later in this policy.

2.2 When you subscribe, your credit card information and other financial data that we need to process your payment are collected and stored by third party payment processors. We may collect some limited information, such as your postal code, mobile number (if provided) and details of your transaction history. In addition, the third party payment processors generally provide us with some limited information related to you, such as a unique token that enables you to make additional purchases using the information they’ve stored, and your card’s type, expiration date, and last four digits.

**3. Use Of Your Personal Information**

We may use your personal information: (a) to administer your subscription and to collect payments from you; (b) to communicate with you: (i) about your subscription (including statements, invoices and payment reminders); (ii) to deliver certain information, recommendations, notifications and updates; and (iii) to send you feedback on your child's reading progress; (c) to send you marketing communications relating to the Service if you have specifically agreed to this; (d) to send you updates about the Service and our email newsletter (if you have requested it); (e) to personalize the Service for your child; (f) to continue to improve the Service and to ensure that the Service is presented in the most effective manner for you and your device; (g) to help us understand and track usage of the Service and behavior, analyze trends and statistics, and to continuously improve the user experience; (h) to administer our systems and enable your use of the Service; (i) to enforce this Privacy Policy, the Terms and Conditions of Use, including to protect the rights, property or safety of Moondog, users or any other person and the Content; and (j) as otherwise stated in this Privacy Policy.

**4. Sharing Of Personal Information**

4.1 We may maintain, use and share statistical data relating to usage of the Service. Any usage data that is maintained, used or shared will be done so on an anonymous, aggregate basis that does not identify any individual user so that your and your child's individual usage cannot be identified separately. For example, we may communicate aggregate reading behavior patterns to publishers and other content providers and communicate statistical data about our users in general.

4.2 If a user invites someone to use the Service, they will disclose their email address as part of the invitation sent to the email address of the user invited so that the invited individual knows who has contacted them.

4.3 We may disclose your personal information (a) when we reasonably believe we are required to do so by law, regulation or other government authority or when we deem it appropriate or necessary to provide such information to law enforcement authorities or in connection with any ongoing or prospective legal proceedings; (b) to protect and defend our rights or property, to enforce the terms that govern use of the Service and any content, to prevent fraud or credit risk or to protect the safety of our employees, agents, or users of the Service; (c) to the potential purchaser of any business or asset that we may be contemplating selling.

**5. Children's Privacy**

5.1 We do not knowingly collect personally identifiable information from children under the age of 18. Any child using the Service must do so with permission from a parent or other responsible adult and you confirm this by agreeing to the Terms & Conditions. When registering your child with the Service, we may ask a series of general questions including your child's age, interests and gender. This information is used to customise content to your child's age and interests and to send you birthday offers in the week before their birthday. We do not use or disclose this information for any other purpose.

5.2 Further to protect our users we comply with the guidelines set out in the Children's Online Privacy Protection Act (COPPA). Parents are strongly encouraged to participate in their children's online activities and monitor their children's use of e-mails and social media. For more information about COPPA: <http://www.ftc.gov/privacy/privacyinitiatives/childrens.html>

**6. Third Party Sites and Offers**

6.1 This Privacy Policy does not apply to the practices of companies that Moondog does not own or control, or to individuals that Moondog does not employ or manage. The Service may contain links to third party websites or applications, and while Moondog attempts to provide links only to those sites that share its respect for privacy, it cannot take responsibility or liability for the content, software, materials, practices or privacy policies of any third-party sites or applications. You acknowledge and understand that we have no control over, and are not responsible for, the privacy policies and practices of third parties.

6.2 From time to time, we may offer you the chance to participate in sweepstakes, contests, and surveys (“Promotions”) through the Service. Such Promotions may be subject to additional terms relating to privacy of information. If this is the case we will notify you at the time you enter into the Promotion.

**7. Transferring Your Information Outside of Europe**

7.1 Your personal information may be stored and processed in or transferred to countries outside the European Economic Area ("**EEA**") as part of your use of the Service. These countries may not have similar data protection laws to the states within the EEA. By submitting your personal information to us, you expressly agree to this storage, processing and/or transfer. If you use the Service while you are outside the EEA, you acknowledge that your personal information may be transferred outside the EEA in order to provide you with the Service.

7.2 If we store, process or transfer your personal information to countries outside the European Economic Area, we will take steps with the aim of ensuring that your privacy continues to be protected to the standard outlined in this Privacy Policy but you acknowledge that we may not be able to prevent use or misuse of your personal information by others.

**8. Security**

8.1 We will store the personal information you provide on secure servers and we will take reasonable precautions to prevent the loss or misuse of your personal information.

8.2 While we will exercise reasonable care and due diligence in providing secure transmission of information between your device and our servers, you acknowledge that the transmission of information over the internet is inherently insecure and that we cannot guarantee the security of data sent over the internet.

**9. Your Right to Access and Update Information**

9.1 You are entitled to ask us to provide you with a copy of any personal information held about you, subject to payment of a fee (GBP 10) and provision of adequate evidence of your identity (a certified photocopy passport and copy utility bill showing your current address).

9.2 If you have any questions about this Privacy Policy, or if you wish to review, correct, update or change your Personal Information at any time, please contact us at contact@moondogbooks.com and select the subject heading 'Privacy'.

9.3 You may opt out of any communications from Moondog. Please contact us at contact@moondogbooks.com and select the subject heading 'Communication opt out' and identify the communication you wish to opt out from.

**10. Changes to Privacy Policy**

We may revise this Privacy Policy from time to time by posting a new Privacy Policy on our website. When we make changes to the Privacy Policy that we consider material, we’ll notify you through the Service. By continuing to use the Service after those changes are made, you are acknowledging your acceptance of the changes.

**11. Cookies**

11.1 What is a cookie ?

A cookie is a file that is placed on your computer or mobile device when you visit a website such as ours. The cookie helps us recognise your device the next time you visit our website. There are other technologies that collect information in a similar way and we refer to all of them as "cookies" in this policy.

11.2 How we use cookies

To optimise our Service

Cookies help us to operate the Service more efficiently. For example, they let us automatically recognise what type of subscriber you are and to provide the correct version of the Service for you. They also let us recognise you when you return to our Service which means we can make the log-in process easier and because we know who you are we may even recommend a new book to you based on the last book you read.

To understand your needs better

We use cookies to analyse how you access and use our Service and in particular this helps us improve our Service and the way we communicate and develop our offer for you.

What we don’t do with cookies

We do not use cookies to target advertising at you and we don’t provide any of the information collected by them to third parties except to certain analytics services that we use to help us understand your needs better based on your history of visits to our website.

11.3 Manage your preferences

Most web browsers allow you to manage your cookie preferences. You can set your browser to refuse cookies, or delete certain cookies. However you should know that if you choose to block cookies, this may impair the functioning of our Service.