

Privacy Notice

Summary

General

Your privacy is important to us. This privacy notice describes the type of personal information about you (referred to as “personal data” or “data”) BookBeat processes about you when you sign up with BookBeat and use BookBeat’s service, and, where applicable, when you buy a voucher from us or click around the app without signing up. This privacy notice also sets out how and why, and the legal bases on which, your personal data is processed and your rights against us with respect to your personal data. All processing by us of your personal data takes place in accordance with applicable laws and regulations, including the EU General Data Protection Regulation (“GDPR”). This privacy notice begins with a summary of how we process your personal data and is followed by more detailed information.

Responsibility for your personal data

BookBeat AB, reg. no. 556560-4583 (“BookBeat”, “we”, “us”) is a controller for the processing of your personal data and we will process your data in accordance with this privacy notice and applicable law. If you want to get in contact with us, you can find our contact details in the section “[Contact us](#)”.

Processing of your data when you have not signed up with BookBeat

There are two situations in which we can process certain data about you even if you have not signed up with us. The first is where you buy a voucher from us and the second is where you click around the app without having an account. For further information on what we use your personal data for in these situations, please see the section “[How we use personal data](#)”.

Why do we process your data?

The main reason we process your data is to allow us to provide the service to you. “service”, “our service” and similar descriptions mean our (BookBeat’s) digital audiobook and e-book subscription service, through which you can listen to and read books and, based on what you have previously listened to and read, we can give you tips on books you might be interested in. You can’t object to the processing of your data which we need to do to provide the service and at the same time demand that we continue to provide the service. We will also send you information about updates to the service, new content, and, where applicable, any campaigns or new services or products. We might also use information about your use of the service and any feedback you give us to improve our service. We also analyse how our customers interact with our mail-outs, i.e. whether you opened the email, clicked on any of the links, etc. You can generally ask us not to do this kind of processing, which is not

necessary to provide the service or which we are not legally obliged to do, and continue to use the service.

For further information on what we use your personal data for, please see the section "[How we use personal data](#)".

What data do we process?

The main data we process is the data you provide to us when you sign up, i.e. your name, email address, password (encrypted) and IP address. To be able to pay for your subscription, you also need to provide certain details about your payment method (e.g. your credit/debit card details). The payments are managed by our payment solutions service provider, and we only receive certain information we need about your payment method (for card payments, we receive the four last numbers of your credit/debit card and the year and month of expiry of your credit/debit card to remind you of the expiry date of the card). We also process details of whether or not you have paid and details of when payments were made.

We also process other personal data. For further information on the categories of personal data we process, please see the section "[What personal data do we collect?](#)"

Processing to which we want to draw your particular attention

We want to give you the most user-friendly and secure service possible. To do so, we need to collect data about the device(s) you use and certain statistics about your usage pattern. The aim of the service is not only to offer a wide range of content, but also to make it easy for you to find books we think you'd like. To allow us to tell you about relevant books, our service has been designed to give you personal recommendations based on the books you have listened to/read and your interaction with the app and the website. If you want to use a service that helps you to find books that you might find interesting, BookBeat's service is for you. If you don't want to receive book recommendations, BookBeat's service might not be for you. We also use companies to help us optimize our digital marketing to you and those with a similar profile to you. We share your personal data with this type of service provider in order to optimize our marketing. The service provider is not allowed to use your personal data for its own purposes and only processes data in accordance with our instructions.

For further information on the categories of personal data we process, please see the section "[What personal data do we collect?](#)"

How long do we process your information?

We process your information as long as you continue subscribing for the service and the majority of the information is necessary to allow you to use the service. When your subscription ends, we will keep the information for a certain amount of time, generally 24 months, to make it easy for you if you want to start subscribing again. However, you can ask us to delete your data at an earlier time. We will need to process some information about you for a longer period of time after you have cancelled your subscription, including information we have a legal obligation to save or if we need the information to bring, or

defend ourselves against, legal claims. However, we won't save your data unnecessarily. For further information on the amount of time your personal data will be saved, please see the section [“How long do we save your personal data?”](#)

The legal basis for our processing

We always process your data in accordance with applicable laws and regulations, including the GDPR. The three legal bases for processing your data are the following: to perform a contract, for the purposes of a legitimate interest, and to comply with a legal obligation. For further information on the legal bases for processing your data, please see the section [“Personal Data Processing Table”](#)

Your rights

You have certain legal rights relating to your personal data which you can exercise by contacting us. A brief description of these rights is provided below.

You have the right to do the following:

1. You can ask for the personal data we process about you and details of how the data is processed (“**right to access**”);
2. You can ask that we correct any incorrect data (“**right to rectification**”);
3. You can ask us to delete your data (other than any data we are required to save by law or which is required to comply with our agreement or bring, or defend ourselves against, legal claims) (“**right to erasure**”);
4. In certain circumstances, you can ask us to restrict the processing of your personal data (“**right to have processing restricted**”);
5. You can object to processing we carry out based on the legal basis “our legitimate interest” (“**right to object**”); and
6. You can ask us to send you the data we process about you in a structured, commonly-used and machine-readable format, and you can transfer this data to someone else without us being able to prevent this (as long as we received the data from you in order to comply with our agreement and that we process the data automatically) (“**right to data portability**”).

You can at any time file a complaint with the relevant data protection authority in the country in which you live or work, or in which a potential personal data infringement has occurred.

For further information about your rights, please see the section [“What are your rights?”](#)

Cookies

We use what are referred to as “cookies” (small pieces of data stored on your device) to provide our website and service and to make it easier to collect data. We can use cookies to store your settings, allow you to log in to the service, provide you with customized marketing, and analyse website measures. For further information about the cookies we use, please see our separate [Cookies Policy](#).

Further information

You can read further details on how we process personal data, how it affects your privacy, and how you can protect your rights by clicking on the links below. You can also find more detailed information about how your personal data is processed in our table (please see the section "[Personal Data Processing Table](#)").

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What personal data do we collect?

BookBeat AB, reg. no. 556560-4583 ("BookBeat", "we", "us") is a controller for the processing of your personal data and we will process your data in accordance with this privacy notice and applicable law. If you want to get in contact with us, you can find our contact details in the section "[Contact us](#)".

We collect data to ensure that our service works efficiently and effectively and to give you the best experience possible. You provide some of this data directly when you create your user account with us, administer your user account, choose to listen to or read a book in the service, or contact our customer services department. If you choose not to provide information which we need to allow you to access the service, you won't be able to use the service.

We want to give you the most user-friendly and secure service possible. To do so, we need to collect information about the device(s) you use and certain statistics about your usage

pattern. The aim of the service is not only to offer a wide range of content, but also to make it easy for you to find books we think you'd like. To allow us to tell you about relevant books, our service has been designed to give you personal recommendations based on the books you have listened to/read and your interaction with the app and the website. If you want to use a service that helps you to find books that you might find interesting, BookBeat's service is for you. If you don't want to receive book recommendations, BookBeat's service might not be for you.

We always process your data in accordance with applicable laws and regulations, including the GDPR. The three legal bases for processing your data are the following: to perform a contract, for the purposes of a legitimate interest, and to comply with a legal obligation.

The main information we process is the information you provide to us when you sign up, i.e. your name, email address, password (encrypted) and IP address. To be able to pay for your subscription, you also need to provide certain details about your payment method (e.g. your credit/debit card details). The payments are managed by our payment solutions service provider, and we only receive certain information we need about your payment method (for card payments, we receive the four last numbers of your credit/debit card and the year and month of expiry of your credit/debit card to remind you of the expiry date of the card). We also process details of whether or not you have paid, and details of when payments were made.

The data we collect about you within the scope of the service depends partly on your choices, your actions, and your privacy settings. We might collect the following data about you:

- **Identification details.** First name, surname, and user ID.
- **Contact details.** Email address.
- **Payment details.** Details of your payment method (e.g. the four last numbers and the expiry date of your credit/debit card), payment history (including details of trial periods and periods without an active subscription), and your account ID.
- **Digital information data.** IP address, geographical location (country only), type of device, name of device, operating system, app version, app settings, book title and ISBN, and password (encrypted).
- **Usage history.** Reading and listening history, title selections, saved books, books you have graded, writers/series you have marked as favourites, search history, buttons you have clicked and other options in the app and on the website.
- **Responses to surveys.** Your responses to surveys/questions we ask you to answer (e.g. when you cancel your subscription), which might contain personal data.
- **Interaction by email, etc. for the purposes of marketing or market research/surveys.** Interaction by email, app message and push notice, e.g. whether you opened the email, whether you clicked on links in the email, and the time and location/city at/in which you opened the email.
- **Other information you provide to our customer services department.** Other information you might need to provide to our customer services department to allow us to assist you with a support or troubleshooting matter.

For more detailed information about the type of personal data that is processed, please see the section [“Personal Data Processing Table”](#).

How we use personal data?

The main reason we process your data is to allow us to provide the service to you. “service”, “our service” and similar descriptions mean our (BookBeat’s) digital audiobook and e-book subscription service, through which you can listen to and read books and, based on what you have previously listened to and read, we can give you tips on books you might be interested in. You can’t object to the processing of your data which we need to do to provide the service and at the same time demand that we continue to provide the service. We will also send you information about updates to the service, new content, and, where applicable, any campaigns or new services or products. We might also use information about your use of the service and any feedback you give us to improve our service. We also analyse how our customers interact with our mail-outs, i.e. whether you opened the email, clicked on any of the links, etc. You can generally ask us not to do this kind of processing, which is not necessary to provide the service or which we are not legally obliged to do, and continue to use the service.

We use your personal data for the following purposes:

To provide the service and to sell vouchers

This allows us to provide the service to you, including:

- enforcing the general terms and conditions for using the service;
- optimizing the service for each device used to access the service;
- allowing us to provide the “continue reading/listening where you left off” function;
- charging you the applicable fees for the service;
- allowing our customer services department to provide you with support and troubleshooting assistance;
- sending you relevant information about the service/subscription, e.g. a welcome email, service updates, a reminder of the expiry date of your credit/debit card, etc.;
- allowing you to test the service, without having to sign up, by downloading the app and clicking around the contents; and
- selling vouchers.

To advertise BookBeat’s contents and services

This allows us to provide marketing, including customized marketing:

- based on your reading and listening history;
- based on your payment history; and
- to people with a similar profile to you.

To improve our service

To allow us to improve our service and our offers, which consists of maintaining and improving the quality of the service, developing new functions, and offering new content, including:

- sending you surveys in which participation is voluntary.

To comply with our legal obligations

To allow us to comply with our legal obligations, including:

- responding to requests from authorities to access personal data; and
- complying with our legal accounting obligations.

To provide an adequate level of security and to prevent fraud

To allow us to prevent and defend ourselves against fraudulent claims and ensure that we maintain a high level of security for the service, including:

- preventing, and defending ourselves against, the repeated and fraudulent use of trial offers;
- preventing, and defending ourselves against, fraudulent claims by customers in relation to payments; and
- maintaining and improving the level of security for the service.

For more detailed information about the purposes for which the personal data is processed, please see the section "[Personal Data Processing Table](#)".

Why do we share your personal data?

Sometimes, we might need to share your information with other companies in our group (we are a member of a corporate group whose ultimate parent company is Bonnier AB, reg. no. 556508-3663) to the extent there are companies in our group that provide services to us. Bonnier AB Group's headquarters is in Sweden, but the group also conducts business and has subsidiaries outside Sweden.

Sometimes, we might also need to share your data with other companies outside our group that perform services for us to ensure that we can provide our service to you and provide customer support, troubleshooting and other technical assistance. Only personal data needed to fulfil the purposes stated in this privacy notice is processed by the companies with which we share the personal data. These companies must comply with our data protection requirements and they are not allowed to use personal data they receive for their own purposes.

For example, the companies that provide the payment solution can directly access the details of your payment method that you provide when you register an account or update later. We also share information with companies we have used to provide IT services (storage, support, error reports and troubleshooting, software updates, etc.), customer support services, surveys, optimization of digital marketing (to you and people with similar

profiles to you), email mail-outs (for informational and marketing purposes), analyses and statistics. Examples of companies we use for the purposes set out below include:

- Microsoft Azure – for storing all data
- Google – for support, troubleshooting, statistics and marketing
- Zendesk – for support and statistics
- Mailchimp – for emails and marketing
- Facebook and Instagram – for adverts, communications, and optimization of digital marketing
- Adyen – for payment processing

Also, if you sign up for our services through other companies (e.g. affiliate partners), we might need to send necessary personal data to such companies to facilitate your subscription.

We might have to share your information for one of the following reasons:

- to comply with the law or a decision by a court or authority and to provide information to the police, the tax authorities, the data protection authorities, and other relevant authorities; or
- to protect rights or property belonging to BookBeat, including enforcing the terms and conditions governing your use of the service.

Data will also be shared outside the EU

Your personal data will also be processed by companies outside the EU that we have used to provide services for us, which we need to carry out the processing of personal data described in this privacy notice. The countries outside the EU where your personal data is processed don't always offer the same high level of protection for your personal data as is offered within the EU. However, we ensure that your personal data receives a high level of protection and we only transfer data to companies that offer a high level of security for your personal data and provided one of the following requirements has been met:

- The country in which the processing takes place offers an [adequate level of protection according to the European Commission](#);
- The company that processes the personal data has entered into the [European Commission's model clauses](#) with us.

Please contact our customer services department if you want to know more. You can also click on the links above to read further information on the European Commission's website about the different options we use to transfer personal data to a country outside the EU.

How can you view and check your personal data?

You can view and update your personal data online, via our website bookbeat.com or via our app. If you log in to your account, you can do the following (among other things):

- View and update your name and email address. You can also change your password.
- View the status of your service subscription, how long it will apply, when the next payment will be made, and your subscription history.
- View and change the payment method by which the subscription fees are charged.
- View details of when you paid the fees for your subscription and receipts of payments.
- View the devices on which you are using the service. The name of the device is the same as the name you stated in the settings on the device you are using. If you want to change the name of the device or devices on which you are using the service, you can do so in the settings in your device outside BookBeat's website/app.

What are your rights?

You have certain legal rights relating to your personal data which you can exercise by contacting us. A brief description of these rights is provided below.

In order for you to be able to exercise your rights, it is important that you are able to verify your identity. When we receive a question or request from you about exercising any of your rights, we will deal with your request in accordance with applicable law. Note that even if you have objected to certain personal data being processed, we can continue to process your personal data in certain cases, e.g. where we have to comply with our legal obligations or perform an agreement with you.

Your right	What this means in practice	How to exercise your right
Right to access	You can ask for the personal data we have about you. This includes the right to be informed whether or not personal data about you is being processed, what personal data is being processed about you, the purpose of the processing, with which companies your personal data is being shared, how long the data will be saved (or the criteria for determining how long it will be saved), and the nature of your rights. Once we have concluded that we can process your personal data based on our legitimate interest, you can also ask for details on how we reached this conclusion. At any time, by contacting us, you can ask for information about the data registered about you.	Our customer services department will assist you to access your personal data. You can choose to receive a standard extract (which includes the most important data) or a full extract. You can access the standard extract by logging in to your account. A full extract will be provided to you in a different way depending on the nature of the data and the form in which it is processed.

Right to rectification	If your personal data is inaccurate or incomplete, you can correct or add to it. At your request or on our own initiative, we will correct data found to be inaccurate.	You can change your name, email address, password and means of paying the subscription fees when you are logged in to your account or our customer services department will assist you to rectify the data you have indicated.
Right to erasure	You can ask us to delete personal data we have about you if it is no longer needed for the purposes for which it was collected, if you object to the processing of your personal data based on our legitimate interest and our legitimate interest does not override your privacy interest, if the personal data has been collected illegally, or if we have a legal obligation to delete your data. Note that we can deny your request for your personal data to be deleted if the processing is allowed or necessary under applicable law or on another legal basis (in order to comply with a legal obligation or to perform our contract with you).	Our customer services department will assist you to delete your personal data.
Right to ask for processing to be restricted	You can ask us to restrict the processing of your personal data if the personal data is not accurate, if the processing is illegal and you object to the deletion of the personal data but instead ask for its use to be restricted, if the personal data is no longer needed for the purposes for it was collected but you need it to establish, bring or defend yourself against legal claims, or if you object to our processing where we have collected your personal data based on our legitimate interest and we are investigating whether your privacy interest overrides our legitimate interest.	Our customer services department will assist you if you want to ask for processing of your personal data to be restricted.
Right to object	You can object where we process your personal data based on our legitimate interest (e.g. for profiling or marketing purposes). If you do so, we won't be allowed to process the personal data unless we can demonstrate legitimate grounds for the processing that override your interests, rights and freedoms or unless for the purposes of establishing, bringing or defending	You can object to certain processing of personal data (e.g. receiving marketing materials) by clicking on a link provided in the email you might receive from us. Our customer services department will assist you in other cases where you want to object to certain processing of your personal data.

	ourselves against legal claims.	
Right to data portability	You can ask us to send you personal data about you that you provided to us in a structured, commonly-used and machine-readable format and you can also transfer your personal data to another controller if the following two requirements are met; (i) the processing is based on a contract with you; and (ii) the processing takes place automatically.	You can access your data portability information by logging in to your account.
Contacting and/or filing a complaint with an authority	You can also at any time file a complaint with a relevant data protection authority in the country in which you live or work, or in which a potential personal data infringement has occurred.	The relevant data protection authority in the UK is the Information Commissioner’s Office (ICO). You can contact the ICO on the following website: https://ico.org.uk/

It is free of charge for you to exercise your rights. However, we reserve the right to charge a reasonable fee or refuse to agree to your request if it is clearly unfounded or unreasonable. We will take action in response to your request without unreasonable delay and provide a response to your request within one month. If your request is complicated, we will notify you within one month that it might take longer to deal with your request.

You can exercise most of your rights by contacting our customer services department. You can do so by clicking on this [link](#) or by using one of the other contact channels listed under “[Contact us](#)”.

How is your personal data protected?

We have taken a number of different technical and organizational measures to protect your personal data from unauthorized access, use and disclosure. For example, we ensure that only authorized persons are allowed to access your personal data. We also use firewalls, encryption, passwords and antivirus programs to protect your personal data. We also have established procedures in place to prevent security threats and to act quickly in the event a security incident occurs in relation to the personal data we process.

How long will your personal data be saved?

BookBeat generally only saves your personal data for as long as is necessary to perform our contract to provide the service to you. However, in some cases, BookBeat might need your personal data for a longer period of time to comply with our legal obligations (e.g. to comply with our legal accounting obligations), resolve any disputes and perform our contracts with

our content providers/publishers (including, at the request of a content provider, to show the number of people that have received a certain book in the service). Since these needs can vary for different types of personal data and contexts, the actual period in which data will be saved can vary.

We process your data as long as you continue subscribing for the service and the majority of the information is necessary to allow you to use the service. When your subscription ends, we will keep the information for a certain amount of time, generally 24 months, to make it easy for you if you want to start subscribing again. However, you can ask us to delete your data at an earlier time. We will need to process some information about you for a longer period of time after you have cancelled your subscription, including information we have a legal obligation to save or if we need the information to bring, or defend ourselves against, legal claims. However, we won't save your data unnecessarily.

For more detailed information about the length of time in which your personal data is processed, please see the section "[Personal Data Processing Table](#)".

Changes to this privacy notice

We might update this privacy notice to ensure that we are acting in accordance with applicable law or if our service changes or if we change our procedures for processing personal data for any other reason. We will publish the changes we make on our website. In the case of major changes, we will also notify you via your registered email address or via the app. When this privacy notice is updated, the date of the latest update will be changed.

Contact us

If you have any questions concerning how we process your personal data, or want to contact us for any other reason relating to your personal data, please contact our DPO by email or post.

Postal address:

BookBeat AB
DPO
Box 3159, 103 63 Stockholm, Sweden

Email addresses:

privacy@bookbeat.com

If you have a question regarding your subscription

Please contact our support at help@bookbeat.com

Data Processing Table

The table below sets out in detail the categories/types of personal data we process about customers, how we received the data (source), the purposes for processing each category of data, the legal bases for processing the data, and the amount of time we process the data.

Under applicable personal data legislation, we can only process your personal data if there is a legally valid ground for doing so. We base our processing of your personal data on three legal bases, which are described in more detail below.

- **To perform a contract (GDPR Article 6.1 (b)).** The processing is necessary to enable BookBeat to perform a contract to which you are party or to take steps at your request prior to entering into a contract. Examples of this are to enable you to log in to and use the service and to receive assistance from our customer services department.
- **For the purposes of a legitimate interest (GDPR Article 6.1 (f)).** The processing is necessary for the purposes of BookBeat’s legitimate interests. Examples include sending emails to you about BookBeat’s news and offers. We will only be able to process personal data on this legal basis if your interests or fundamental rights and freedoms don’t override our legitimate interest and require your data to be protected. When we have concluded that we can process your personal data based on our legitimate interest, we consider that the security measures we have taken are sufficient to ensure that our legitimate interest overrides your interests or fundamental rights and freedoms. Please feel free to contact us at any time if you want to know how we have reached this conclusion.
- **To comply with a legal obligation (GDPR Article 6.1 (c)).** The processing is necessary to allow BookBeat to comply with a legal obligation to which we are subject, e.g. financial information that must be saved to satisfy our legal accounting obligations.

Personal data type and source	Purpose	Legal basis	Retention time or criteria
Identification details – First name, surname, and user ID. Source: Directly from the customer when the customer registers an account. As regards the user ID, this is an ID number generated by BookBeat which represents the customer (linked to the customer's email address).	To allow BookBeat to provide the service to the customer, including enforcing the general terms and conditions for using the service.	Performance of a contract	During the period in which the customer has a user account and up to 24 months after the cancellation of the customer's latest subscription.
	To allow BookBeat to provide the customer with support and troubleshooting assistance from our customer services department.	Legitimate interest	During the period in which the customer has a user account and up to 24 months after the customer has last had contact with customer support.
	To allow BookBeat to provide direct		During the period in

Personal data type and source	Purpose	Legal basis	Retention time or criteria
	marketing to the customer and people with a similar profile to the customer via e.g. email, social media and advertising networks.		which the customer has a user account and up to 24 months after the cancellation of the customer's latest subscription.
	To allow BookBeat to comply with legal obligations imposed on us, including responding to requests from authorities to access personal data.	Legal obligation	
<p>Contact details – Email address.</p> <p>Source: Directly from the customer when the customer registers an account, buys a voucher, or contacts BookBeat's customer services department.</p>	To allow BookBeat to provide the service to the customer, including enforcing the general terms and conditions for using the service.	Performance of a contract	During the period in which the customer has a user account and up to 24 months after the cancellation of the customer's latest subscription.
	To allow BookBeat to deliver and redeem vouchers irrespective of whether or not they have an account registered with us.		Until the voucher is redeemed or expires.
	To allow BookBeat to send relevant information about the service/subscription, e.g. a welcome email, service updates, etc.		During the period in which the customer has a user account and up to 24 months after the cancellation of the customer's latest subscription.
	To allow BookBeat to comply with legal obligations imposed on us, including responding to requests from authorities to access personal data.	Legal obligation	
	To allow BookBeat to provide direct marketing to the customer and people with a similar profile to the customer by e.g. email, social media and advertising networks.	Legitimate interest	During the period in which the customer has a user account and up to 24 months after the cancellation of the customer's latest subscription, unless the customer has opted out of profiling or direct marketing.
	To allow BookBeat to send surveys which are voluntary to participate in.		
	To allow BookBeat to prevent, and defend itself against, the repeated		12 months after the deletion of the

Personal data type and source	Purpose	Legal basis	Retention time or criteria
	and fraudulent use of trial offers.		account.
	To allow BookBeat to provide the customer with support and troubleshooting assistance from our customer services department.		During the period in which the customer has a user account and up to 24 months after the customer has last had contact with customer support.
<p>Payment details – Details of your payment method (e.g. the 4 last numbers, expiry date, IBAN number, and email address of the credit/debit card), payment history (including details of trial periods and periods without an active subscription), and account ID.</p> <p>Source: Directly from the customer when the customer registers an account and, as regards payment history, as and when payments are made. As regards the account ID, this is an ID number selected at random by BookBeat which represents the person paying for the subscription (linked to the relevant payment method).</p>	To allow BookBeat to charge the customer applicable fees for the service.	Performance of a contract	During the period in which the customer has a user account and up to 24 months after the cancellation of the customer's latest subscription.
	To allow BookBeat to deliver vouchers irrespective of whether or not you have an account registered with us.		Until the voucher is redeemed or expires.
	To allow BookBeat to send relevant information about the service/subscription, e.g. the expiry date of the customer's credit/debit cards.		During the period in which the customer has a user account and up to 24 months after the cancellation of the customer's latest subscription.
	To allow BookBeat to provide direct marketing to the customer based on their payment history.	Legitimate interest	During the period in which the customer has a user account and up to 24 months after the cancellation of the customer's latest subscription, unless the customer has opted out of profiling or direct marketing.
	To allow BookBeat to provide the customer with support and troubleshooting assistance from our customer services department.		During the period in which the customer has a user account and up to 24 months after the customer has last had contact with

Personal data type and source	Purpose	Legal basis	Retention time or criteria
			customer support.
	To allow BookBeat to prevent, and defend itself against, fraudulent claims by the customer in relation to payments.		7 years after the end of the financial year in which the relevant payment was made.
	To allow BookBeat to comply with legal obligations imposed on BookBeat, including legal accounting obligations.	Legal obligation	7 years after the end of the financial year in which the relevant payment was made.
<p>Digital information data – IP address, geographical location, type of device, name of device, operating system, app version, app settings, book title and ISBN, incorrect codes, incorrect logins, and password (encrypted).</p> <p>Source: Directly from the customer when the customer registers an account. The IP address is also collected in connection with registration. As regards the type and name of the device, this data is collected based on the customer's use of the service.</p>	To allow BookBeat to provide the service to the customer, including enforcing the general terms and conditions for using the service.	Performance of a contract	During the period in which the customer has a user account and up to 24 months after the cancellation of the customer's latest subscription.
	To allow BookBeat to optimize the service for each device used to access the service.		
	To allow BookBeat to send relevant information about the service/subscription, e.g. service updates.		During the period in which the customer has a user account and up to 24 months after the cancellation of the customer's latest subscription.
		To allow BookBeat to improve its service and other offers, including the security for the service.	Legitimate interest
	To allow BookBeat to provide direct marketing to the customer, e.g. based on devices the customer uses to access the service.		
	To allow BookBeat to provide the customer with support and troubleshooting assistance from our customer services department.	During the period in which the customer has a user account and up to 24 months after the customer has last had contact with customer support.	
Usage history – Reading and listening history, title selections,	To allow BookBeat to provide the service to the customer, including	Performance	During the period in which the customer

Personal data type and source	Purpose	Legal basis	Retention time or criteria
<p>saved books, books you have graded, bookmarks, writers/series you have marked as favourites, search history, buttons you have clicked and other options in the app and on the website.</p> <p>Source: Collected based on the customer's use of the service and website.</p>	<p>the "continue reading/listening where you left off" function and to report payments to content providers (based on the customer's use of the service).</p>	<p>of a contract</p>	<p>has a user account and up to 24 months after the cancellation of the customer's latest subscription. Usage history will then be anonymized.</p>
	<p>To allow BookBeat to improve its service and offers.</p>	<p>Legitimate interest</p>	<p>During the period in which the customer has a user account and up to 24 months after the cancellation of the customer's latest subscription.</p>
	<p>To allow BookBeat to provide direct marketing to the customer, e.g. based on their reading and listening history.</p>		<p>During the period in which the customer has a user account and up to 24 months after the cancellation of the customer's latest subscription, unless the customer has opted out of profiling or direct marketing.</p>
	<p>To allow BookBeat to provide the customer with support and troubleshooting assistance from our customer services department.</p>		<p>During the period in which the customer has a user account and up to 24 months after the customer has last had contact with customer support.</p>
<p>Responses to surveys – Customer's responses to surveys/questions we ask the customer to answer (e.g. when the customer cancels their subscription), which could contain personal data.</p>	<p>To allow BookBeat to improve its service and offers and to send marketing or information to the customer, e.g. if the customer cancels their subscription because a particular book is not offered via the service, BookBeat can notify the (former) customer that the book is now available via the service.</p>		<p>Legitimate interest</p>
<p>Interaction by email, etc. for the purposes of marketing or market research/surveys - Interaction by</p>	<p>To allow BookBeat to improve its service and offers.</p>	<p>Legitimate interest</p>	<p>During the period in which the customer has a user account and</p>

Personal data type and source	Purpose	Legal basis	Retention time or criteria
email, app message and push notice, e.g. whether the email has been opened, whether links in the email have been clicked on, and the time and location/city at/in which the email was opened by the recipient.			up to 24 months after the cancellation of the customer's latest subscription.
Other information provided to BookBeat's customer services department – Additional information a customer might need to provide to our customer services department to allow us to assist the customer with a support or troubleshooting matter.	To allow BookBeat to provide the customer with support and troubleshooting assistance from our customer services department.	Performance of a contract	During the period in which the customer has a user account and up to 24 months after the cancellation of the customer's latest subscription.
Source: Directly from the customer when they contact BookBeat's customer services department.	To allow BookBeat to improve its service and other offers, including the security for the service.	Legitimate interest	During the period in which the customer has a user account and up to 24 months after the cancellation of the customer's latest subscription.

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