

NORTHWIND STORYTELLING CONTEST **CHILDREN'S PRIVACY NOTICE**

Last Updated: 2/2/2022

Thank you for your interest in the Northwind Storytelling Contest ("Contest") sponsored by Macmillan Publishers ("Macmillan," "we," "us," "our"). This Children's Contest Privacy Notice supplements Macmillan's [general Privacy Notice](#), and applies to children under 13 years of age ("children" or "child") visiting the Contest's website, located at bit.ly/NorthwindStorytelling ("Contest Website"). This Children's Contest Privacy Notice does not apply to any other Macmillan website, application, or service that does not display or link to this Children's Contest Privacy Notice. Further, only Macmillan's general Privacy Notice applies to adults and teens visiting the Contest Website.

Macmillan knows that safeguarding the privacy of children is very important. Accordingly, we provide this Children's Contest Privacy Notice to inform parents and legal guardians (collectively or alternatively "parents" or "parent") of:

- The types of information we may collect from children through their use of the Contest Website;
- How we use the information collected;
- Our practices for sharing that information;
- Our practices for notifying and obtaining parental consent when we collect personal information from children, including how a parent may revoke consent; and
- All entities that collect or maintain information from children through the Contest Website.

Unless otherwise stated, capitalized terms that are defined in the [general Privacy Notice](#) have the same meanings as used in this Children's Contest Privacy Notice. If you have any questions about this Children's Contest Privacy Notice, you may contact us by e-mail at DataPrivacy@macmillan.com.

1. What Kinds of Information Do We Collect From Children Through the Contest Website?

Personal information, as used here, has the same meaning as defined in our [general Privacy Notice](#), and for purposes of this Children's Contest Privacy Notice, also includes any information considered to be "personal information" under the Children's Online Privacy and Protection Act ("COPPA") and its implementing regulations, as they may be amended from time to time, including geolocation information and persistent identifiers that can be used to recognize a user over time and across different websites or online services.

Children can access and use parts of the Contest Website without providing us with personal information. We do not knowingly collect, store, use or disclose any personal information from children through the Contest Website without first notifying and obtaining the express consent of a parent, other than collecting the limited personal information necessary to obtain parental consent, as described in Section 4 below.

After parental consent is provided, a child must provide us with the following personal information to enter the Contest via the Contest Website: (1) the child's first and last name; and (2) his or her email address. The child will also be required to provide us with the zip code where he or she resides.

To enter the Contest, a child must also submit a written essay. Although the **[Official Rules]** of the Contest instruct that children should refrain from including personal information in their essays, we cannot control whether an essay submitted by a child includes his or her personal information, or the personal information of others (e.g., the street and city in which a child lives, parents' or siblings' names). If your child includes such information in his or her essay submitted via the Contest Website, we will necessarily collect that information. We encourage parents to review children's essays before they are submitted to determine if they include personal information that should be removed in accordance with the **[Official Rules]** of the Contest.

We may also passively collect certain information from a child when he or she accesses, navigates, and uses the Contest Website. For example, we may collect information about the type of browser a child is using, the operating system on a child's computer or device, the domain name of a child's Internet service provider, and/or the child's IP address or mobile device identifier. This information is collected using technologies such as cookies, flash cookies, web beacons, as described in our general [Privacy Notice](#). We will not, however, use persistent identifiers to recognize a child over time and across different websites or online services, without first notifying and getting consent from a parent. We may combine non-personal information collected through these passive technologies with personal information provided by your child, after obtaining parental consent.

We do not enable children to make their personal information publicly available on the Contest Website.

2. How Do We Use Information Collected from Children Through the Contest Website?

We may use the personal information (and non-personal information) of a child that we collect to support our internal operations, and, with a parent's consent: (1) to process and track the child's entry in the Contest; (2) to operate and improve the Contest Website; (3) to respond to a child's comments and questions, and provide customer service; (4) to send a child information related to the Contest and Contest Website, including confirmations, updates, support, administrative notices, and, in our discretion, updates to Contest and Contest Website policies and procedures; (5) to conduct research and analyses to address the performance of the Contest Website; and/or (6) for purposes disclosed at the time the child provides his or her information or as otherwise set forth in the general Privacy Notice or this Children's Privacy Notice.

3. How Do We Share Personal Information Collected from Children Through the Contest Website?

(a) No Third-Party Marketing Purposes. We will not rent, sell or otherwise disclose a child's personal information to advertisers, sponsors, business partners and other third parties for their use to directly market to the child.

(b) Third Parties Providing Services on Our Behalf. We may use third-party vendors to perform certain aspects of the Contest Website. This may include hosting the Contest Website, designing and/or operating the Contest Website's features, tracking the Contest Website's analytics, processing Contest entries, or performing other administrative services. We may provide these vendors with access to user information, including a child's personal information, to carry out the services they are performing for the child or for us. These third-party vendors have access to the personal information needed to perform their functions and are contractually obligated to maintain the confidentiality and security of that personal information. In addition, while we may use third-party analytics service providers to evaluate and provide us with information about the use of the Contest Website and viewing of our content, we do not share personal information with these analytics service providers, but they may set and access their own cookies, web beacons and embedded scripts on the child's device and they may otherwise collect or have access to information about the child, including non-personal information.

(c) Disclosure Related to the Contest. A child can participate in the Contest only with consent from a parent, which would include the parent agreeing to Official Rules that govern that Contest. Such Official Rules provide that consent to disclosure of the personal information and essay may be required and requested for Contest winners, subject to separate and additional requests for and acquisitions of parental consent. If a child chooses to enter the Contest, is deemed a winner, and the parent consents, personal information may be disclosed to third parties in connection with the administration of such Contest after receipt of that further consent, including, in connection with winner selection, prize fulfillment, and as required by law or permitted by the Contest's Official Rules and any necessary parental consent, such as on a winners list. As stated above, we do not enable children to make their personal information publicly available on our Contest Website.

(e) Administrative and Legal Reasons. Though we typically collect and maintain children's personal information only for an activity-specific purpose, such as participation in the Contest, to the extent we retain children's personal information, we may access, use, preserve, transfer and disclose a child's personal information, including disclosure to third parties, if in our good faith belief, it is required: (i) to comply with or satisfy any applicable law, regulation, subpoenas, governmental requests or legal process if in our good faith opinion such is required or permitted by law; (ii) to protect and/or defend the [Terms of Use](#) for our websites or services or other policies applicable to the Contest and Contest Website, including investigation of potential violations thereof; (iii) to protect the safety, rights, property or security of Macmillan Publishing, the Contest and Contest Website, any third party person or entity, or the public (including under emergency circumstances); and/or (iv) to detect, prevent or otherwise address fraud, security or technical issues. Further, we may use IP address or other device identifiers to identify users, and

may do so in cooperation with third parties such as copyright owners, Internet service providers, wireless service providers and/or law enforcement agencies, including disclosing such information to third parties, all in our discretion. Such disclosures may be carried out without notice to the child or parent.

(f) Business Transfer. We may share a child's information, including the child's personal information, demographic information and usage information with our parent, subsidiaries and affiliates for internal reasons. We also reserve the right to disclose and transfer all such information: (i) to a subsequent owner, co-owner or operator of the Contest Website or applicable database; or (ii) in connection with a corporate merger, consolidation, restructuring, the sale of substantially all of our membership interests and/or assets or other corporate change, including, during the course of any due diligence process.

If you are a parent of a child, and believe the child has disclosed personal information through the Contest Website without your knowledge and consent, please contact us at DataPrivacy@macmillan.com. If such collection is verified, we will delete such information.

4. How Do We Notify and Get Consent from a Parent to Collect a Child's Personal Information Through the Contest Website?

When a child requests to enter the Contest via the Contest Website, we follow this “**Parental Notice and Consent Process**”:

- We ask the child to supply their month and year of birth, email address and an email address for a parent.
- We will send an email (at the supplied email address) to directly notify the parent of the child's request to enter the Contest via the Contest Website, and describe the personal information that we intend to collect from the child in connection with his or her use of the Contest Website.
- The parent will have the opportunity to consent (or not) to our collection and use of the child's personal information by following a URL link provided in the body of the email or sending a reply email to **kidsschoolandlibrary@macmillanusa.com**. If the parent chooses to provide consent, at a later time, we will send another message via the parent's online contact information to confirm the consent, and inform the parent how they can revoke the consent if they later choose to do so.
- If the child's use of the Contest Website requires disclosure within the meaning of COPPA of children's personal information, consent specific to that activity and its related disclosure will be obtained from the parent via a consent form signed by the parent and returned to Macmillan by postal mail, facsimile, electronic scan, or equivalent means.

By giving consent, a parent: (i) agrees that the child's activities on our Contest Website are subject to the [Terms of Use](#) for our websites or services; and (ii) consents to our storage and use of personal information collected from the child as described in our general Privacy

Notice and this Children's Contest Privacy Notice. As described below, we make special provisions to allow parents to control the personal information submitted by and collected from children.

If a parent does not give consent to collection of personal information, the child's and parent's email addresses will be deleted within 24 hours. The child will still be able to browse and view content on the Contest Website, but we will not collect personal information from the child.

5. How Can a Parent Review, Change or Delete Personal Information Collected from Children Through the Contest Website?

Parents have the right to review all personal information about children collected by us through the Contest Website, can ask us to delete the personal information, and can refuse to permit us to collect or use a child's personal information in the future. If a parent wishes to review a child's personal information, or ask us to delete that personal information, you may send us a letter to the postal address in Section 7 below, or email us at DataPrivacy@macmillan.com. If you contact us via email, please include "Review Child's Information" in the subject line of your email. Note that we may require that the parent provide us with personal information in a good faith effort to confirm the parent's identity and relationship to a child prior to providing access to their child's personal information.

6. How Will We Notify Parents if This Children's Contest Privacy Notice Changes?

We may amend this Children's Contest Privacy Notice while the Contest and the Contest Webpage are active. We will provide parents notice by e-mail of any material changes in the way we intend to collect or use children's personal information, and will seek additional consent, to the extent necessary, for any disclosure of their children's personal information. Please note that, at all times, parents should update their contact information to provide us current email addresses. Parental contact information may be updated by contacting us at DataPrivacy@macmillan.com. We will apply material changes to this Children's Contest Privacy Notice only in conformance with applicable law, including any applicable provisions of COPPA that require parental consent.

7. How Can You Contact Us?

Macmillan is the sponsor of the Contest and operator of the Contest Website. Our contact information is below. If you have any questions about this Children's Contest Privacy Notice, or our data practices, you may contact us in the following ways:

By e-mail: DataPrivacy@macmillan.com

By postal mail:

Macmillan Publishers
Digital Marketing Department
120 Broadway

New York, NY 10271
Attention: Digital Marketing Manager

In the subject line of your email or letter, please specify that the Northwind Storytelling Contest and the Contest Website are the subject of your inquiry.