

# Privacy Notices

## Bedford, Freeman & Worth Publishers

Last Updated: March 2026

BFW Publishers understands your concerns about security and privacy and values the relationship we have with you. These Privacy Notices describe the types of personal information we collect, how and why we use and disclose the information, and how to exercise your privacy choices. We also describe the measures we take to safeguard the information and tell you how to contact us about our privacy practices.

### Contents:

- [School Data Privacy Notice](#) governing the use of our products and services, e.g., ACHIEVE, iCLICKER, LAUNCHPAD, SAPLING and Hayden McNeil's Digital Lab Notebooks.
- [BFW Publishers Privacy Notice](#) governing the use of our other sites, e.g. our online store, catalog pages and community sites
- [Cookies Notice](#)
- [Your Privacy Choices and How To Contact Us](#) to exercise your privacy choices and our contact details
- [Supplemental Privacy Notices](#)
  - [Australia and New Zealand](#)
  - [Brazil](#)
  - [California](#)
  - [European Economic Area, Switzerland and the UK](#)

We may update these Privacy Notices from time to time. We will post a notification online if the changes are material.

### School Data Privacy Notice

BFW Publishers processes personal information for educational institutions pertaining to students and instructors who use our learning platforms in connection with their classes. This information, along with other personal information that we may maintain on behalf of the educational institutions, such as class rosters, are "School Data" and are only used and disclosed at the direction of the institution.

BFW Publishers is committed to protecting the privacy and security of all School Data that we process as a "data processor" or "service provider" to your school in order to provide the services to you and your school, pursuant to applicable laws. For example, if your school is based in: i) the United States, your student records may be protected by the Family and Educational Rights Privacy Act (FERPA) or the California Consumer Privacy Act (CCPA); ii) Canada, your information held by public bodies may be protected by The Freedom of Information and Protection of Privacy Act (FIPPA), or iii) the European Economic Area or the UK, your School Data may be protected by the General Data Protection Regulation (GDPR) and the UK GDPR respectively. For information on your school's privacy policies, please contact the administration.

If you use our products and platforms in your courses at your school, we only use your personal information in the School Data as needed to:

- Provide you with the products, content or services selected by you, your instructors or your school and for related activities, such as customer service and "helpdesk" functions,
- Assure academic integrity, such as in connection with investigations and anti-plagiarism program,
- Understand how you use our products, content and services, including associating you with different devices that you may use to access our content, for analytics and product development purposes, and to create de-identified datasets,
- Send end-of-course surveys, and
- Manage our everyday business needs, such as website administration, business continuity and disaster recovery, security and fraud prevention, corporate governance, reporting and legal compliance.

We will only use School Data for other purposes with the consent of your school and (if applicable) with your consent. Please note that we may publish reports or create products that contain de-identified, aggregated or statistical data, such as benchmarking reports that reveal how students generally engage with our platforms. These reports and products do not contain any information that would enable the recipient to contact, locate or identify you.

We may use online data collection tools (such as cookies, pixel tags and session recorders) that allow us to analyze user behavior on our platforms. The data collected are aggregated to allow us to understand how individuals interact with our educational materials, such as to assess engagement and improve learning outcomes, and for product development purposes. For example, we may use analytics to study the amount of time that students spend on specific content items and we may infer engagement from this process. These analytics also help us understand and improve our materials, and determine what materials are accessible to students. We do not use these data in an individually identifiable way, to create profiles of individuals or for any marketing, however, we may also use these types of tools for course integrity purposes, such as to identify individuals who may be cheating.

We do not use School Data for targeted marketing purposes. This means that we do not select or deliver ads to you in our educational products and services based on your School Data obtained or inferred over time from your use of our educational products and services. We may deliver generic or contextual ads to you while you use our educational products or platforms, but we do not target these ads based on your School Data.

Students, please also note: All School Data may be disclosed to your school (including to your instructors and school administrators). Your instructors generally have access to all School Data, including the information generated by your use of the products for a class, and we may provide other information to your school as needed to investigate possible academic fraud or cheating or threat of danger or other serious issue. Your school uses the School Data in accordance with its own privacy policies.

We may disclose School Data to our affiliates, which only use the School Data for the purposes listed above, and with our service providers, who are bound by law or contract to protect the School Data and only use it as needed to provide the services requested. We will also disclose School Data when required by law, such as in response to a subpoena, including to law enforcement agencies and courts in the United States and other countries where we operate.

If you have questions about your privacy rights, please contact your school's administration. If you believe that

BFW Publishers has not handled your personal information properly, you may also contact the BFW Publishers Privacy Office via email to [privacyisimportant@macmillan.com](mailto:privacyisimportant@macmillan.com).

*\*\*List of current service providers who processes School Data. These service providers are bound by law or contract to protect your Personal Information and only use your Personal Information in accordance with our instructions.*

| NAME OF SERVICE PROVIDER  | PURPOSE OF RE-DISCLOSURE TO SERVICE PROVIDER | PRODUCT           | COUNTRY                              |
|---------------------------|----------------------------------------------|-------------------|--------------------------------------|
| Amazon Web Services (AWS) | Storage (for US institutions)                | Achieve, iClicker | United States                        |
| Industrial Logic          | IT Tech Support                              | Achieve           | United States                        |
| InMotion Software         | IT Tech Support                              | Achieve, iClicker | United States                        |
| InTouch CX                | Customer Support                             | Achieve, iClicker | United States, Jamaica (call center) |
| Robots & Pencils          | IT Tech Support                              | Achieve           | United States                        |
| RocSearch                 | IT Tech Support                              | Achieve           | United States                        |
| Salesforce                | Customer Support                             | Achieve, iClicker | United States                        |
| Stride                    | IT Tech Support                              | Achieve           | United States                        |
| TechMahindra              | IT Tech Support                              | Achieve, iClicker | United States                        |
| Technology Navigators     | IT Tech Support                              | Achieve           | United States                        |
| TekSystems                | IT Tech Support                              | Achieve           | United States                        |
| VitalSource               | Digital content delivery                     | Achieve           | United States                        |

## BFW Publishers Privacy Notice

### 1. Our Collection, Use and Disclosure of Personal Information

BFW Publishers collects personal information from educational professionals (such as teachers, instructors, school administrators, authors, editors, and contributors) and consumers who interact with us directly through our online sites (e.g., our BFW Publishers Store, catalog pages and community sites), mobile apps or at trade shows, campus visits, or business meetings.

This Privacy Notice applies to the personal information we collect for our own business purposes. (Please read our above [School Data Privacy Notice](#) to learn about our commitment to privacy for student and instructor information we process for educational institution customers using our products and services.)

**“Personal Information”** or **“PI”** is any information that can be used to identify, locate or contact you. It also includes other information that may be associated with your name or other identifiers. The chart below describes the categories of personal information we collect, the sources of that information, the reasons we collect it, and the types of people to whom we may disclose the information.

Please note that we may use and disclose any personal information for our “Everyday Business Purposes”<sup>1</sup> as permitted by law. We may also disclose any personal information to our affiliates and to the service providers and contractors that need to use the information to provide services to us. We have contracts with these companies that require them to protect our information and to comply with law. We may also disclose any information when required by law, such as to law enforcement agencies or to parties in litigation.

| CATEGORY AND SOURCES OF PI                                                                                                                                                                                                                                                                                                                                                                                    | PURPOSES FOR COLLECTING THIS PI                                                                                                                                                                                                                                                              | DISCLOSURES OF THIS PI                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Contact Information</b><br>Such as:<br>• Your name<br>• Mailing address or email address<br>• Telephone number<br>We collect this type of information from you and from publicly available sources, such as educational institution sites and social media sites. We may also receive this information from third parties, such as event and trade shows organizers, and providers of marketing databases. | We use this type of information to identify you and communicate with you, including:<br>• To send transactional messages (such as purchase confirmations)<br>• To send marketing communications, surveys and invitations<br>• To personalize our communications and provide customer service | We disclose this type of information to service providers and contractors and to:<br>• Entities that deliver our communications, such as telecommunications carriers, couriers or the postal service<br>• Social media companies such as Facebook which use the data only to identify which of our customers use their platforms so that we can deliver ads to you on the platform                                                                                                                                     |
| <b>Unique Identifiers</b><br>Such as:<br>• Customer number<br>• System identifiers<br>• Device identifiers<br>• Advertising ID<br>We assign a customer number to you when you create an account in our online store.<br>We collect this type of information from your devices and from our online partners, such as third parties, who place cookies containing advertising IDs on your devices for us.       | We use this type of information:<br>• To identify you or your device, including to associate you with different devices that you may use<br>• For record-keeping and reporting, including for data matching<br>• For metrics and analytics.<br>• For online ad delivery and personalization  | We disclose this type of information to service providers and contractors that fulfill orders and support our information technology and security programs, including companies that assist with fraud prevention, detection and mitigation.<br><br>Advertising ID is shared with third party network advertising partners.<br><br>You can opt-out of the sale or sharing of your information with third parties by visiting the <b>Your Privacy Choices</b> link in the footer of the respective BFW Publishers site. |
| <b>Government Issued Identifiers</b><br>Such as:<br>• Social Security number<br>• Tax ID number<br>We collect this type of information from you when required to make payments to you.                                                                                                                                                                                                                        | We use this type of information for identity verification and legal compliance, such as reporting payments made to authors, influencers or suppliers as required by law.                                                                                                                     | We disclose this information to service providers and contractors, including payment processing services and to governance agencies for required reporting and legal compliance.                                                                                                                                                                                                                                                                                                                                       |
| <b>Account Access Information</b><br>Such as:<br>• Usernames and/or passwords<br>• Account recovery information (such as security questions and answers)<br>We collect this type of information from you, when establishing an account or changing your password.<br>We may create this information for you, such as if we assign you a username or account number or issue you a temporary password.         | We use this type of information:<br>• To identify and authenticate you<br>• To enable you to engage in transactions with us (such as interacting with us online)<br>• For security and similar purposes                                                                                      | We disclose this type of information to service providers and contractors that assist with our information technology and security programs.                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Relationship Information</b><br>Such as:<br>• Personal characteristic, like your age or gender<br>• Social media profile details<br>• Reading interests<br>• Marketing and communication preferences                                                                                                                                                                                                       | We use this type of information:<br>• To better understand you and to understand our customers generally<br>• To design products, services and programs that delight our customers, including promotions and loyalty programs<br>• For personalization, including to send you personalized   | We disclose this type of information to service providers and contractors, including those that support our marketing programs.<br><br>As permitted by law, we may share this information with joint marketing partners and companies with whom we have similar arrangements.                                                                                                                                                                                                                                          |

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|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• School affiliation</li> <li>• Professional credentials (degree information, academics interests)</li> </ul> <p>We collect this type of information from you and from:</p> <ul style="list-style-type: none"> <li>• Publicly available sources, such as social media sites or educational institution websites</li> <li>• Data brokers that enhance our records to help us understand our customers.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                | <p>offers and invitations and complimentary products (such as teacher guides)</p> <ul style="list-style-type: none"> <li>• To enable you to participate in discussion groups and forums</li> <li>• To identify prospective customers</li> <li>• For internal business purposes, such as quality control, training and analytics</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>You can opt-out of the sale or sharing of your information with third parties by visiting the <b>Your Privacy Choices</b> link in the footer of the respective BFW Publishers site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p><b>Transaction and Interaction Information</b></p> <p>Such as:</p> <ul style="list-style-type: none"> <li>• Customer account information, purchase history and related records (returns, records of payments, credits etc.)</li> <li>• Records related to your response to promotions, including sweepstakes entries and complimentary products</li> <li>• Records related to downloads and purchases of online content, including records of use or sharing of our content</li> <li>• Customer service records</li> <li>• Visitor logs</li> </ul> <p>We collect this type of information from you and from companies that process transactions for us.</p> <p>We may collect this information automatically when you interact with us online.</p>                                                                                                                  | <p>We use this type of information:</p> <ul style="list-style-type: none"> <li>• To fulfill our business relationship with you and your company (if applicable) and for customer service purposes</li> <li>• To administer programs, including promotions, sweepstakes and influencer programs</li> <li>• In connection with anti-piracy programs. Our materials include a digital watermark that is linked to the name and email address in your BFW Publishers account to allow us to identify the source of any materials which are used in ways not permitted by the <a href="#">Terms of Use</a>. This helps us prevent online piracy and other unauthorized use.</li> <li>• For recordkeeping and compliance</li> <li>• For internal business purposes, such as finance, quality control, training, reporting and analytics and dispute resolution</li> <li>• For risk management, fraud prevention and similar purposes</li> </ul> | <p>We may disclose this type of information to service providers and contractors as needed to complete the transaction, including delivery companies.</p> <p>If you are interacting with us on behalf of an educational institution, we may disclose the information to that institution. Please see Business Customer Information below.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <p><b>Online &amp; Technical Information</b></p> <p>Such as:</p> <ul style="list-style-type: none"> <li>• IP Address</li> <li>• Device identifiers</li> <li>• Device characteristics</li> <li>• Server and application logs</li> <li>• Data from cookies, pixel tags, sessions recorders, and other online tools</li> </ul> <p>We collect this type of information from your computer or devices when you interact with our platforms, websites and applications. For example, when you visit our websites, our server logs record your IP address and other information. We may also receive this information from third parties, including computer security services and advertising partners. Please read our Cookies Notice below to learn more.</p>                                                                                                              | <p>We use this type of information:</p> <ul style="list-style-type: none"> <li>• For system administration, technology management, including optimizing our websites and applications.</li> <li>• For information security and cybersecurity purposes, including detecting threats</li> <li>• For recordkeeping, including logs and records that maintained as part of Transaction Information</li> <li>• To better understand our customers and prospective customers and to enhance our Relationship Information, including by associating you with different devices and browsers</li> <li>• For online targeting and advertising purposes</li> <li>• For our Everyday Business Purposes</li> </ul>                                                                                                                                                                                                                                    | <p>We may disclose this type of information to our service providers and contractors who support our information technology programs or host our websites and to:</p> <ul style="list-style-type: none"> <li>• Third party network advertising partners</li> </ul> <p>You can opt-out of the sale or sharing of your information with third parties by visiting the <b>Your Privacy Choices</b> link in the footer of the respective BFW Publishers site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <p><b>Audio Visual Information</b></p> <p>Such as:</p> <ul style="list-style-type: none"> <li>• Photographs and videos</li> <li>• CCTV recordings</li> <li>• Call center recordings and call monitoring records</li> <li>• Voicemails</li> </ul> <p>We collect this type of information from you and from publicly available sources, such as social media sites. We may also collect this information automatically, such as when we record calls to our call center and use CCTV cameras in our facilities.</p>                                                                                                                                                                                                                                                                                                                                                      | <p>We use this type of information:</p> <ul style="list-style-type: none"> <li>• For internal business purposes, such as call recordings used for training, coaching or quality control</li> <li>• For relationship purposes, such as use of photos and videos for social media purposes</li> <li>• For premises security purposes and loss prevention</li> <li>• For our Everyday Business Purposes</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>We may disclose this type of information to our service providers and contractors that support our information technology and security programs, and our loss prevention programs.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p><b>Financial Account Information</b></p> <p>Such as:</p> <ul style="list-style-type: none"> <li>• Payment card information.</li> </ul> <p>We collect this type of information from you.</p> <p>For security purposes, we do not generally store payment card information. These data elements are collected by our payment processors and not generally retained by BFW Publishers.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>We use this type of information as needed to complete transactions with you, such as processing payments and issuing refunds, and for our Everyday Business Purposes.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <p>We may disclose this type of information to our service providers and contractors, such as our payment processors, financial institutions and others as needed to complete the transactions and for authentication, security and fraud prevention.</p> <p>BFW Publishers uses Braintree to process payments for our US online store. Braintree is a subsidiary of PayPal and processes the data pursuant to PayPal's Payment Privacy Statement, available at <a href="https://www.paypal.com/us/webapps/mpp/ua/privacy-full">https://www.paypal.com/us/webapps/mpp/ua/privacy-full</a>. Outside the US, payment processing is handled by Stripe in accordance with Stripe's Privacy Policy, available at: <a href="https://stripe.com/privacy">https://stripe.com/privacy</a>. Both PayPal and Stripe are independent controllers for the purpose of processing payment data.</p> |
| <p><b>Health Information</b></p> <p>Macmillan does not generally collect health information. In some cases, individuals may provide health information to us, such as if needed to accommodate a disability or in connection with workplace accidents and occupational safety. We collect this information from you or other individuals, such as in the event of an accident or incident in one of our offices.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>We use this type of information for the specific purpose for which it was collected, such as to accommodate disabilities and enable accessibility of our products, services and facilities, or for occupational health and safety programs and for our Everyday Business Purposes.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p>We may disclose this type of information to service providers, contractors or others as needed for the specific purpose for which it was collected, such as to first responders, healthcare providers, our insurers, or occupational health and safety authorities.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p><b>Children's data</b></p> <p>The store, catalog pages and community sites are intended for people aged 18 and over.</p> <p>For our product platforms, please read our above School Data Privacy Notice to learn about our commitment to privacy for student and instructor information we process for educational institution customers.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <p>We use this information to provide the information and products purchased by the individual and as otherwise described in this notice.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>We may disclose this type of information to our service providers and contractors as described in this notice.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p><b>Business Customer Data</b></p> <p>We collect "B2B" personal information about business professionals associated with our commercial customers, suppliers and partners in the context of our relationships with the companies with whom we do business. For example, if you are an educational professional interacting with us through an educational institution, we may collect "Business Customer Data" such as:</p> <ul style="list-style-type: none"> <li>• Information about your role within the institutions, your authorization to use products and services, and your authority to place orders</li> <li>• Product usage, customer service, training and related records</li> </ul> <p>We collect this type of information from you and from your company. We may receive your data from third parties, such as trade associations or trade shows.</p> | <p>We use this type of information:</p> <ul style="list-style-type: none"> <li>• To fulfill our business relationship with you and/or your company</li> <li>• To develop and maintain our relationship with you and with your company</li> <li>• For recordkeeping and compliance, including dispute resolution</li> <li>• For internal business purposes, such as finance, quality control, training, reporting and analytics</li> <li>• For risk management, fraud prevention and similar purpose</li> <li>• For our Everyday Business Purposes</li> </ul>                                                                                                                                                                                                                                                                                                                                                                              | <p>We may disclose this type of information to our service providers and contractors and to your company and other companies (such as your company's affiliates and service providers), as needed for the commercial relationship (such including your information on purchase documents that you authorize).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p><b>Compliance data</b></p> <p>Such as:</p> <ul style="list-style-type: none"> <li>• Records that demonstrate compliance with applicable laws, such as tax laws, occupational safety laws or privacy laws</li> <li>• Records related to our intellectual property protection and anti-piracy programs</li> <li>• Records pertaining to academic dishonesty, plagiarism and similar professional misconduct</li> <li>• Records relating to complaints and internal investigations.</li> </ul> <p>We collect this type of information from you and from third parties, including companies that help us conduct internal investigations.</p>                                                                                                                                                                                                                           | <p>We use this type of information:</p> <ul style="list-style-type: none"> <li>• To comply with and demonstrate compliance with applicable laws</li> <li>• For legal matters, including litigation and regulatory matters, including for use in connection with civil, criminal, administrative, or arbitral proceedings, before regulatory or self-regulatory bodies, including service of process, investigations in anticipation of litigation, execution or enforcement of judgments and orders</li> <li>• For internal business purposes, such as risk management, audit, internal investigations, reporting, analytics</li> </ul>                                                                                                                                                                                                                                                                                                   | <p>We may disclose this type of information to our service providers and contractors, including our lawyers, auditors and consultants, and to:</p> <ul style="list-style-type: none"> <li>• Customers, in connection with their audits of BFW Publishers</li> <li>• Other entities (including government agencies, courts and opposing law firms, consultants, process servers and parties to litigation) in connection with legal matters as required or permitted by law.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                               |

Please note that we may also use and disclose information about you that is not personally identifiable. For example, we may publish reports or create products that contain de-identified, aggregated or statistical data. These reports and products do not contain any information that would enable the recipient to contact, locate or identify you.

**BFW Publishers does not sell any personal information for monetary consideration. We may share personal information for cross-contextual behavioral advertising or online targeted advertising; you can opt-out (or opt-in as required by applicable laws) of our sharing of your data for these purposes by visiting the Your Privacy Choices link in the footer of the respective BFW Publishers site.**

## 2. Your Privacy Rights and How to Exercise Them

BFW Publishers respects your rights to access, correct and request erasure or restriction of your personal data as required by law. Depending on your country or state of residence, these rights may include:

- The right to be informed about our collection, use and disclosure of your personal information,
- The right to know if we maintain your personal information, and if we do, to access that information (subject to the rights of others) and to request that we provide your information in a portable format,
- The right to ask us to correct your information if it is incomplete or incorrect.
- The right to object to our processing of your personal information, including the rights to object to:
  - the sale of your personal information,
  - the sharing or use of your personal information for certain types of online targeted advertising,
  - the use of profiling or automated decision-making which might significantly affect you,
  - certain secondary uses and disclosures of sensitive personal information, and,
  - if we are processing your personal information based on your consent, to withdraw your consent at any time, and
- The right to ask that we delete your personal information.

**To learn more about the specific rights that you have and to exercise your rights, please visit the Your Privacy Choices link in the footer of the respective BFW Publishers site.**

Please understand that these rights are subject to some limitations. For example, we may require documentation to support certain corrections to your information, and we generally cannot restrict or delete personal information in those situations where our retention is required for our internal business purposes or to comply with law.

We will not retaliate against you if you exercise your privacy rights.

## 3. Analytics, Profiling and Automated Decision-Making

We do not use profiling or automated decisions-tools to make decisions that produce legal or similarly significant legal effects for you; any such decisions are made only based on human review.

## 4. Information Security

We have implemented an information security program that is reasonably designed to protect the confidentiality and security of all the personal information that is entrusted to us. Our security safeguards protect against unauthorized access, improper use, alteration, destruction or accidental loss. Our service providers and data processors are contractually required to implement appropriate security controls.

We have also implemented procedures to deal with any actual or suspected data security breach and will notify you and the applicable authority about a breach as required by law.

## 5. Data Retention

We will retain your personal information for as long as the information is needed for the purposes listed above and for any additional period that may be required or permitted by law, such as for business, legal, accounting, or reporting requirements.

The length of time your personal information is retained depends on the purpose(s) for which it was collected, how it is used, and the requirements we have under applicable laws. If you would like us to delete your personal information, please visit the **Your Privacy Choices** link in the footer of the respective BFW Publishers site. If we do not have a legal basis for retaining your information, we will delete it as required by applicable law.

## 6. International Transfers of Personal Information

BFW Publishers is headquartered in the United States. Your personal information may be transferred to, stored at or processed in the European Economic Area (EEA), the United Kingdom (UK), the United States and other countries (including Australia, Argentina and India) which may not have equivalent privacy or data protection laws. However, regardless of where your personal information is transferred, we will protect it in accordance with this Privacy Notice and applicable law.

Where required, we use approved Standard Contractual Clauses and other approved data transfer mechanisms to assure that personal data is adequately protected. Please contact the BFW Publishers Privacy Office at [privacyisimportant@macmillan.com](mailto:privacyisimportant@macmillan.com) if you would like more information about cross-border transfers or to obtain a copy of any applicable Standard Contractual Clauses.

## 7. Links to Other Websites

Our websites contain links to other websites for your convenience and information. We may also provide links that allow you to access and interact with partners, such as authors or retail partners, or to use partner forms or blogs. When you intentionally interact with a partner through these links, the partner's own policy will govern the personal information that you provide. We suggest you review partner privacy policies to understand how they may collect, use, and disclose your information. We are not responsible for the content of any websites that are not affiliated with BFW Publishers, any use of those websites, or their privacy practices.

## Cookies Notice

When you visit our website or use our mobile applications, we collect certain information by automated means, using technologies such as cookies, pixel tags, browser analysis tools, server logs and web beacons. In many cases, the information we collect using cookies and other tools is only used in a non-identifiable way. For example, we use information we collect about all website users to optimize our websites and to understand website traffic patterns.

In some cases, we do associate the information we collect using cookies and other technology with a unique identifier. The [BFW Publishers Privacy Notice](#) governs how we use this personal information.

Please note: our in-classroom products and platforms, e.g., ACHIEVE, only utilize first party cookies for the limited purposes set forth above in the [School Data Privacy Notice](#).

## Cookies

A "cookie" is a text file that websites send to a visitor's computer or other Internet-connected device to uniquely identify the visitor's browser or to store information or settings in the browser. Your browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies.

Our sites use two kinds of cookies: session cookies and persistent cookies. Session cookies exist only for as long as your browser remains open. Once you close your browser, they are deleted. Persistent cookies remain on your hard drive after you close your browser. The cookies used on our sites include those that are strictly necessary cookies for access and navigation (strictly necessary cookies), cookies that track usage (performance cookies), cookies that remember your choices (preference cookies), and for visitors to our catalog and store sites, cookies that provide you with online targeted advertising (or cross contextual behavioral advertising) (advertising cookies).

We may use the information we obtain from cookies for the following purposes:

- to recognize your computer when you visit the Sites;

- to track you as you navigate the Sites, and to enable the use of e-commerce capabilities;
- to improve the Sites' usability;
- to analyze use of the Sites;
- to manage the Sites;
- to personalize the Sites, including for visitors to our catalog and store Sites;
- to enable targeted advertisements that may be of particular interest to you (Note: no School Data is used for targeting ads to Students); and
- to recognize you when you move between devices so that your work can be synchronized.

When you visit our websites, we will always place strictly necessary cookies. You have choices about preference, performance and advertising cookies. You can use our Cookie Consent Tool, accessible via the **Your Privacy Choices** link in the footer of each respective BFW Publishers site, to control which of these cookies you wish to accept, or to reject all non-necessary cookies. If you exercise your rights to tell us not to sell/share your information to not to use your information for online targeted advertising, we will refrain from placing third party performance cookies and advertising cookies on your browser.

### Pixel Tags

Pixel tags, also known as tracking pixels, web beacons or clear GIFs, are tools used to transmit information collected through cookies to our service providers' servers. They allow us to determine whether you have performed a specific action. When you access these pages or open or click an email (including marketing communications from us), or click on and/or watch a marketing video that we sent to you, the pixel tags and web beacons generate a notice of that action (e.g. that you have opened the email; that you have watched the video). These tools allow us to measure response to our communications and improve our web pages and promotions. They also enable our service providers to compile information about your browsing activity on the sites.

### Server Logs and Other Technologies

We collect many different types of information from server logs and other technologies. For example, we may collect information from the device you use to access our website, your operating system type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone where your device is located. Our server logs also record the IP address of the device you use to connect to the Internet. An IP address is a unique identifier that devices use to identify and communicate with each other on the Internet. We may also collect information about the website you were visiting before you came to BFW Publishers and the website you visit after you leave our site.

### Analytics

Our websites use third party analytics services, such as Google Analytics. Analytics services help us understand how people use our websites. In some cases, these services are provided by companies that act as service providers for us, meaning that they do not use the information collected for their own purposes. In other cases, the company may combine information collected from users of our websites with information collected from other websites. You have the right to opt-out of having your data combined by these third parties.

To manage the analytics cookies that are placed by us and by third parties on our sites and to opt out or opt-in (as required by applicable law) of analytics, visit the **Your Privacy Choices** link in the footer of the respective BFW Publishers site.

### Interest-based Advertising

On some of our Sites, as set out below and where permitted by law, we partner with third party companies who may utilize cookies, web beacons or other technologies to provide: personalized content; advertisements about our goods and services that may be of interest to you; or to serve advertisements about other products; tracking your engagement with marketing emails and videos we send to you. The third parties may use these technologies to collect information about you when you use the Sites. They may collect information about your online activities over time and across different websites and other online services, as well as across different devices. They may use this information to provide you with interest-based advertising and content or other targeted advertising and content. They may also use persistent identifiers to track your Internet usage across other websites in their networks beyond the Sites. Such third parties may, with sufficient data from other sources, be able to personally identify you, unknown to us.

### Social Media Interactions Ads

Our websites may enable you to interact with us and others via social media platforms, such as Facebook, Twitter, YouTube, LinkedIn and Instagram. While we respect each social media platform's privacy policies, we may collect Personal Information about you and your friends if you choose to use these tools. For example, the Sites may also offer you the ability to interact with plugins from these platforms, in order to allow you to follow us or share your experiences with your online social network.

Social media platforms collect persistent identifiers through your browser or mobile operating system. If you have previously provided personally identifiable information to these platforms, the platform operators may recognize you here. Your use of social network plugins is subject to each social media site's privacy policy. If you engage with our content on or through third-party social media sites, you may allow us to have access to certain information associated with your social media account (e.g., name, username, email address, profile picture) to deliver the content or as part of the operation of the plug-in or application. For more information, please read the privacy policies posted by the social media platforms that you use.

As noted above, we may also display interest-based ads to you when you are using social media platforms. These platforms allow us to personalize the ads that we display to you. We do not provide any of your Personal Information with these platforms, although we may convert your email address into a unique number which can be matched by the platform with its user to allow delivery of the advertising. Although we do not provide any personal information to these platforms, they may gain insights about individuals who respond to the ads we serve.

To manage the cookies that are placed by us and by third parties on our sites and to opt out or opt-in (as required by applicable law) of online targeted advertising by BFW Publishers, visit the **Your Privacy Choices** link in the footer of the respective BFW Publishers site.

### Your Privacy Choices and How To Contact Us

To exercise your privacy rights with respect to the personal information that we collect for our own business purposes, such as from users on our online store, catalog pages, IAM single-sign-on system and community sites, please click the **Your Privacy Choices** link in the footer of the respective BFW Publishers site.

If you are a student or an instructor who has questions about the information collected in connection with your use of BFW Publishers digital products and platforms, e.g., ACHIEVE, ICLICKER, SAPLING, LAUNCHPAD, or Hayden McNeil's Digital Lab Notebooks, please read our School Data Privacy Notice. BFW Publishers operates as a Service Provider (or data processor) for your educational institution. Users of these platforms should contact their respective educational institutions to exercise their rights.

## Supplemental Privacy Statements

### Important Information for EEA, Swiss and UK Residents

BFW Publishers is providing this supplemental privacy notice to give individuals in the European Economic Area (EEA), Switzerland and the United Kingdom (UK) the additional information required by the EU General Data Protection Regulation (GDPR), the Swiss Federal Data Protection Law and the UK GDPR respectively.

These provisions, together with the statements in the BFW Publishers Privacy Notice (our "Privacy Policy"), explain our practices with regard to EEA, Swiss and UK personal data.

This supplementary privacy notice applies when BFW Publishers is acting as a data controller (i.e., when we exercise overall control of the personal data being processed and are ultimately in charge of and responsible for the processing). BFW Publishers is a data controller for the personal data (personal information) described in the BFW Publishers Privacy Notice.

When we process Personal Information pertaining to the use of the learning platforms by students and instructors, BFW Publishers is a data processor. We only process these data in accordance with the school's instructions (unless required otherwise by law). Accordingly, students and instructors should refer to their school's privacy notice for more information about how it handles such personal information. Please read our School Data Privacy Notice.

## 1. Information about BFW Publishers

**BFW Publishers is based in the United States. Our representative in the UK is:**

Macmillan Publishers International Limited  
Company number: [02063302](#)  
Registered Office: Cromwell Place  
Hampshire International Business Park  
Lime Tree Way  
Basingstoke, Hampshire, RG24 8YJ

**Our representative in the EEA is:**

Macmillan Publishers International Limited  
1st Floor, The Liffey Trust Centre  
117-126 Sheriff Street Upper  
Dublin 1  
D01 YC43

## 2. The Purposes and Legal Basis for Processing, including Legitimate Interests

The BFW Publishers Privacy Notice explains the reasons why we process your Personal Information. We only process Personal Information when we have a legal basis for the processing, such as where it is necessary:

- To fulfill a contract with you or your school, and for closely-related purposes, such as payment processing and financial account management, contract management, website administration, business continuity and disaster recovery, security and fraud prevention, corporate governance, reporting and legal compliance, and
- With your consent (or provided you have not objected, as may be appropriate under applicable law), such as to provide you with marketing communications, in relation to the use of cookies, or where you are asked to provide special categories of data as part of a survey request that we provide on behalf of your school/educational institution.

We may also process your Personal Information for the purposes of our legitimate interests (or for the legitimate interests of your school), provided that our interests shall not outweigh your rights and freedoms. In particular, we may process your Personal Information as needed to:

- Protect you, us or others from threats (such as security threats or fraud) piracy or cheating,
- Comply with the laws that are applicable to us around the world,
- Enable or administer our business, such as for quality control, consolidated reporting, and customer service,
- De-identify it to create anonymized and/or aggregated datasets,
- Manage corporate transactions, such as mergers or acquisitions, and
- Understand and improve our business or customer relationships generally; and
- If you are an instructor or school administrator only (provided you have not objected and if otherwise permitted under applicable law), send you information about our educational resources and services that may be of interest to you.

## 3. When You are Required to Provide Personal Information to BFW Publishers

In most cases, you are not required by law to provide any Personal Information to BFW Publishers. You are required to provide certain Personal Information to enable us to enter into a contract with you so that you can use our products and services. Our registration forms indicate which data elements are required for our contracts. If you do not provide these data elements, we cannot do business with you.

If you are a Student using our Sites as part of a required course adoption and you do not want to provide us with your name, you may register under an alias. You will need to create an alias and create and open an e-mail account under that alias with a third-party email service. Next, when you register on our Sites, you will do so by providing your alias and the email address you've opened under that alias. You will be required to accept the applicable Terms of Use as part of the registration process, which you will complete under your alias. IT IS CRITICAL THAT YOU MAKE SURE YOU INFORM YOUR INSTRUCTOR OF YOUR ALIAS SO THAT HE/SHE HAS ACCESS TO YOUR WORK AND CAN ASSOCIATE YOUR ALIAS WITH YOUR NAME AS IT APPEARS IN OTHER SCHOOL DATA.

## 4. Automated Decision-Making

We will not make automated-decisions using Personal Information about you that may significantly affect you, unless (1) the decision is necessary as part of a contract that we have with you, (2) we have your explicit consent, or (3) we are required by law to use the technology.

## 5. Your Rights

BFW Publishers respects the rights of EEA, Swiss and UK residents to access, correct and request erasure or restriction of their personal information as required by law. As described in the BFW Publishers Privacy Notice:

- You generally have a right to know whether or not BFW Publishers maintains your Personal Information. If we do have your personal information, we will provide you with a copy (subject to the rights of others). If your information is incorrect or incomplete, you have the right to ask us to update it. In some cases, you may have the right to receive information that you provided to us back in a machine-readable format.
- You have the right to object to our processing of your Personal Information, including withdrawing any consents for processing that you may have given us at any time.
- You may also ask us to delete or restrict your personal information.

To exercise these rights, please visit the Your Privacy Choices link in the footer of the respective BFW Publishers site. Please understand that we may need to verify your identity before we can process your request. Please note that some of these rights may be limited where we have an overriding interest or legal obligation to continue to process your Personal Information.

If you believe that we have processed your Personal Information in violation of applicable law, you may file a complaint with the Privacy Office ([privacyisimportant@macmillan.com](mailto:privacyisimportant@macmillan.com)) or with a supervisory authority.

*Students: please contact your school if you would like assistance exercising any of your individual rights related to your School Data.*

## 6. International Transfers

As noted in the BFW Publishers Privacy Notice, your Personal Information will be transferred to, stored at and

processed in the United States and other countries which may not have equivalent privacy or data protection laws to the EEA, Switzerland or the UK. We use Standard Contractual Clauses and other approved mechanisms to ensure that your Personal Information is always protected appropriately.

Personal Information submitted to and processed via our MacmillanLearning.com/ed/uk site is housed in the U.S. Macmillan Publishers International Limited, an affiliate of BFW Publishers processes sales and marketing data as a service provider on behalf of BFW Publishers.

Please contact us via email to [privacyisimportant@macmillan.com](mailto:privacyisimportant@macmillan.com) if you would like more information about cross-border transfers.

7. Data Retention

We will retain your Personal Information for as long as the information is needed for the purposes set forth in Section 2 above and for any additional period that may be required or permitted by law.

You may request that we delete your Personal Information via the **Your Privacy Choices** link in the footer of the respective BFW Publishers site.

Students and instructors: please contact your school if you would like to request deletion of any School Data.

8. How to Contact Us

If you have any questions or comments about our privacy practices or this Privacy Notice, you can reach us via the Your Privacy Choices link in the footer of the respective BFW Publishers site.

Additional Information for California Residents

The [BFW Publishers Privacy Notice \(our "Privacy Policy"\)](#) provides most of the information required by the California Consumer Privacy Act and the California Privacy Rights Act (collectively, the "CPRA"). This supplemental privacy notice gives California residents the additional information required by the CPRA.

*Please note that BFW Publishers collects information from students and instructors in connection with its educational products and platforms. We operate as a Service Provider under the CPRA for educational institutions that use our products and platforms. If you are a student or an instructor with questions about our educational products and platforms, e.g., ACHIEVE, ICLICKER, SAPLING, LAUNCHPAD, or Hayden McNeil's Digital Lab Notebooks, please read our [School Data Privacy Notice](#) and contact your respective educational institution to exercise your rights.*

Your California Privacy Rights

The CPRA provides California residents with specific privacy rights:

- The right to know what personal information and sensitive personal information we collect
- The right to access your personal information
- The right to correct inaccurate personal information
- The right to request that we delete your personal information
- The right to know what categories of personal information are sold to third parties and to opt-out of that sale
- The right to know what categories of personal information are shared with third parties for cross-contextual behavioral targeting and to opt-out that sharing
- The right to limit the use and disclosure of sensitive personal information
- The right not to be retaliated against for exercising your privacy rights

If you are a California resident, you may exercise your rights by:

- Calling our Toll-Free Number: [1-800-894-7205](tel:1-800-894-7205)
- Visiting our privacy rights portal via the **Your Privacy Choices** link in the footer of the respective BFW Publishers site
- Emailing [privacyisimportant@macmillan.com](mailto:privacyisimportant@macmillan.com)
- Writing to us at:  
**BFW Publishers Privacy Office**  
120 Broadway, 24th Floor  
New York, NY 10271  
Att: General Counsel

If you would like to designate an agent, please send an email from your own email address to [privacyisimportant@macmillan.com](mailto:privacyisimportant@macmillan.com) indicating the name and email address of your agent. We will respond to that person's requests using both your email address and the agent's email address.

If you are exercising CPRA access or deletion rights on behalf of another person, please understand that we need to verify your authority with the person you seek to represent.

2. Additional CPRA Right to Know Disclosures

BFW Publishers uses and discloses the following categories of sensitive personal information as described in more detail in the BFW Publishers Privacy Notice. We do not process any sensitive personal information for the purpose of informing characteristics about you.

| Category of Sensitive Personal Information | Purposes for Use and Disclosure                                                                                                                  | Can I limit this Use and Disclosure? |
|--------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
| Government-issued Identification Numbers   | We use and disclose Government-issued Identification Numbers in connection with payments made to professionals for tax reporting and compliance. | No                                   |
| Account log-in credentials                 | We use and disclose Account Access Information as needed to allow you to access your account, for account security purposes.                     | No                                   |
| Financial account or payment card numbers  | We use and disclose financial account and payment card numbers as needed to process transactions                                                 | No                                   |

We do not collect precise geolocation data, or biometric identifiers.

3. Sale of Personal Information and Sharing of Personal Information for Cross-Contextual Behavioral Targeting; Collection of Personal Information by Third Parties

BFW Publishers does not sell any personal information for monetary consideration.

Some BFW Publishers websites allow third party advertising partners to utilize cookies, web beacons or other technologies to deliver ads to you on our sites and to deliver our advertisements to you on other sites. These third parties may collect information about your online activities on our websites, and they may use persistent identifiers to track you over time and across different websites and other online services. You can opt-out (or opt-in as required by applicable law) of our sharing of your data for cross contextual behavior advertising by visiting the Your Privacy Choices link in the footer of the respective BFW Publishers site.

## Financial Incentives

BFW Publishers does not offer financial incentives for the collection or sale of personal information. We may offer individuals the opportunity to receive coupons or discounts via email. If you ask us to delete your information, we will not be able to send you additional coupons or discounts via email, however coupons or discounts sent to you previously will continue to be honored according to their original terms.

## Important Information for Australia and New Zealand Residents

BFW Publishers welcomes questions and comments about this Privacy Notice. You may submit requests for access and correction of your personal information, and questions or comments via the Your Privacy Choices link in the footer of the respective BFW Publishers site.

If you are still not satisfied about the way in which we have handled your personal information, you can contact the Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)) or, in New Zealand, the Office of the Privacy Commissioner ([www.privacy.org.nz](http://www.privacy.org.nz)) for guidance.

## Important Information for Residents of Brazil

BFW Publishers is providing this supplemental privacy notice to give individuals in Brazil the additional information required by Federal Law No. 13,709/2018 - General Data Protection Law of Brazil ("LGPD"). These provisions, together with the statements in the BFW Publishers Privacy Notice, explain our practices for personal data subject to LGPD ("Brazilian Data").

### 1. Legal Basis for Processing Personal Data

The BFW Publishers Privacy Notice explains the reasons why we may process Brazilian Data. We only process Brazilian Data when we have a legal basis for the processing, such as for the following types of processing activities:

- To fulfill a contract with you or your school, and for closely related purposes, such as payment processing and financial account management, contract management, website administration, business continuity and disaster recovery, security and fraud prevention, corporate governance, reporting and legal compliance, and
- With your consent (or provided you have not objected, as may be appropriate under applicable law), such as to provide you with marketing communications, in relation to the use of cookies, or where you are asked to provide special categories of data as part of a survey request that we provide on behalf of your school/educational institution.

We may also process your Personal Information for the purposes of our legitimate interests (or for the legitimate interests of your school), provided that our interests shall not outweigh your rights and freedoms. In particular, we may process your Personal Information as needed to:

- Protect you, us or others from threats (such as security threats or fraud) piracy or cheating,
- Comply with the laws that are applicable to us around the world,
- Enable or administer our business, such as for quality control, consolidated reporting, and customer service,
- De-identify it to create anonymized and/or aggregated datasets,
- Manage corporate transactions, such as mergers or acquisitions, and
- Understand and improve our business or customer relationships generally; and
- If you are an instructor or school administrator only (provided you have not objected and if otherwise permitted under applicable law), send you information about our educational resources and services that may be of interest to you.

We will not make automated decisions that significantly affect any individual, unless (1) the decision is necessary as part of a contract that we have with you, or (2) we are required by law to use the technology.

### 2. Your Privacy Rights

BFW Publishers respects the rights of Brazilian residents to access, correct and request erasure or restriction of their personal data as required by LGPD. This means:

- You have a right to know if BFW Publishers maintains your personal data
- If we do have your personal data, you have the right to have access to the data
- You have the right ask us to correct or update incomplete, inaccurate or outdated information
- You have the right to ask us to anonymize, block or eliminate any unnecessary or excessive personal data, or any personal data processed in non-compliance with LGPD
- You have the right to data portability, in accordance with national authority regulations
- You have the right to receive information about the public and private entities with which we have shared your personal data
- If we are processing your personal data on the basis of your consent, you also have the right to (1) be informed about the possibility of not providing consent and consequences of not providing consent, (2) revoke your consent, and (3) ask us to delete your personal data, subject to our rights to retain data as provided by LGPD.

You can exercise these rights by visiting the Your Privacy Choices link in the footer of the respective BFW Publishers site. Please understand that we may need to verify your identity before we can process your request. Additionally, your rights may be subject to some limitations as provided by LGPD. If we deny your request, we will explain the reasons for the denial.

If you believe that we have processed your personal data in violation of applicable law, you may file a complaint with BFW Publishers's Privacy Office via email to [privacyisimportant@macmillan.com](mailto:privacyisimportant@macmillan.com) or with the supervisory authority.

### 3. Transfers of Personal Data

Your personal data may be transferred to, stored at or processed in the United States and other countries which may not have equivalent privacy or data protection laws. However, BFW Publishers provides that Brazilian Data are always processed in compliance with LGPD.

As noted in the BFW Publishers Privacy Notice, we only share Brazilian Data:

- With our affiliates, who use the personal data for the purposes set forth above.
- With our service providers (data processors) or others as needed to provide the services to you,
- With your explicit consent, or
- As permitted by LGPD (such as in connection with the sale of business assets) or required by law.

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<sup>1</sup>**Everyday Business Purposes** encompasses the Business Purposes (as defined by California law) and following related purposes for which any personal information may be processed:

- To provide the information, product or service requested by the individual or as reasonably expected given the context in which with the personal information was collected (such customer credentialing, providing customer service and preference management, providing product updates, bug fixes or recalls, and dispute resolution)
- For identity and credential management, including identity verification and authentication, system and technology administration
- To protect the security and integrity of systems, networks, applications and data, including detecting, analyzing and resolving security threats, and collaborating with cybersecurity centers, consortia and law enforcement about imminent threats
- For fraud detection and prevention,
- For legal and regulatory compliance, including all uses and disclosures of personal information that are required by law or for reasonably needed for compliance with company policies and procedures, such as:

anti-money laundering programs, security and incident response programs, intellectual property protection and anti-piracy programs, and corporate ethics and compliance hotlines,

- For corporate audit, analysis and reporting,
- To enforce our contracts and to protect against injury, theft, legal liability, fraud or abuse, to protect people or property, including physical security programs
- To de-identify the data or create aggregated datasets, such as for consolidating reporting, research or analytics,
- To make back-up copies for business continuity and disaster recovery purposes, and
- For corporate governance, including mergers, acquisitions and divestitures.

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