

# **Akvo Flow Privacy Policy**

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## Document Control

## Version History

Version	Status	Reason for change	Changes done by
1	Draft		Lynn Brannstrom
2	Draft	Suggestions by Jana	Lynn Brannstrom
2.1	Final		Lynn Brannstrom

## Key Privacy Points: The Stuff You Really Care About

### IF YOU ARE AN AKVO FLOW USER AND SURVEY CREATOR:

- **Your survey data is owned by you.** Not only that, but the Akvo Foundation treats your surveys as if they were private (except if you have selected to add the surveys to the Akvo Flow's public map). We don't sell them to anyone and we don't use the survey responses you collect for purposes unrelated to you or our services, except in a limited set of circumstances (e.g. if we are compelled by a subpoena, or if you've given us permission to do so).
- **We safeguard collected data.** The Akvo Foundation acts as a mere custodian of that data.
- **We hold your data securely.** Read our '[How does Akvo ensure data security?](#)' for more information.
- **Survey data is stored on servers located in the European Union.** The Akvo Foundation will process your survey data on your behalf and under your instructions (including the ones agreed to in this privacy policy).

### IF YOU ANSWER SURVEYS:

- **Surveys are administered by Akvo Flow Users.** Akvo Flow Users conduct thousands of surveys each day using our services. We host the surveys on our websites and collect the responses that you submit to the survey creator. If you have any questions about a survey you are taking, please contact the survey creator directly as The Akvo Foundation is not responsible for the content of that survey or your responses to it. The survey creator is usually the organisation that invited you to take the survey and sometimes they have their own privacy policy.
- **Are your responses anonymous?** This depends on how the survey was created. Contact the survey creator to find out.
- **We don't sell your responses to third parties.** The Akvo Foundation doesn't sell or share your survey responses with third party advertisers or marketers (although the survey creator might, so check with them). The Akvo Foundation merely acts as a custodian on behalf of the survey creator who controls your data, except as further described in this privacy policy with regard to surveys added to Akvo Flow's public map.
- If you think a survey violates our Terms of Service or may be engaging in illegal activity, report it to [privacy@akvo.org](mailto:privacy@akvo.org).

## Detailed Privacy Points: The long read

### PRIVACY FOR AKVO FLOW USERS AND SURVEY CREATORS:

#### 1. What information does Akvo Flow collect?

- When you use Akvo Flow, we collect information relating to you and your use of our services from a variety of sources. These are listed below. The sections afterward describe what we do with this information.

#### 2. Information we collect directly from you

- **Registration information.** You need an Akvo Flow account before you can create or manage surveys on Akvo Flow. When you register for an account, we collect your username and email address. Your account is created using a third party account (Google account), please see "Information from third parties" below. When installing the Akvo Flow app for Android, we collect your username and a Device ID to ensure that surveys can be assigned to the device.
- **Account settings.** Your assigned User Administrator controls your user settings.
- **Survey data.** We store your survey data (questions and responses) for you.
- **Other data you intentionally share.** We may collect your personal information or data if you submit it to us in other contexts. For example, if you provide us with a testimonial.
- **We don't share or abuse your respondents' data.** Rest assured, the Akvo Foundation will not sell your data to any third parties.

#### 3. Information we collect about you indirectly or passively when you interact with us

- **Usage data.** We collect usage data about you whenever you interact with our services. This may include which web pages you visit, what you click on, when you performed those actions, and so on. Additionally, like most websites today, our web servers keep log files that record data each time a device accesses those servers. The log files contain data about the nature of each access, including originating IP addresses, internet service providers, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system versions, and timestamps.
- **Device data.** We collect data from the device and application you use to access our services, such as your IP address, operating system version, device type, system and performance information, and browser type. We may also infer your geographic location based on your IP address. When installing the Akvo Flow app we

collect the IMEI, Android ID and Android version, this is needed for app to function as required.

- **Referral data.** If you arrive at an Akvo Flow website from an external source (such as a link on another website or in an email), we record information about the source that referred you to us.
- **Information from third parties.** We may collect your personal information or data from third parties if you give permission to those third parties to share your information with us. For example, when you register and sign into Akvo Flow with your Google account details. If you do this, the authentication of your log on details is handled by Google and we only collect information about your Google account that you expressly agree to share with us at the time you give permission for your Akvo Flow account to be linked to your Google account.
- **Information from page tags.** We use third party tracking services that employ cookies and page tags (also known as web beacons) to collect aggregated and anonymised data about visitors to our websites. This data includes usage and user statistics. Emails sent by Akvo Flow or by users through our services may include page tags that allow the sender to collect information about who opened those emails and clicked on links in them. We do this to allow the email sender to measure the performance of their email messaging and to learn how to improve email deliverability and open rates.

#### 4. How does Akvo Flow use the information we collect?

- **We treat your survey questions and responses as information that is private to you (except if you have selected to add the surveys to the Akvo Flow's public map).** We know that, in many cases, you want to keep your survey questions and responses (which we collectively refer to as "survey data") private. Unless you decide to share your survey responses with the public (such as by making the survey responses available via a public map), we do not use your survey data other than as described in this privacy policy or unless we have your express consent. We do not sell your survey data to third parties.
- Generally, we use the information we collect from you in connection with providing our services to you and, on your behalf, to your survey respondents. For example, specific ways we use this information are listed below. (See the next section of this privacy policy to see who we share your information with.) However, this privacy policy is not intended to restrict our use of survey questions or responses you have selected to add to the Akvo Flow's public map
  - **To provide you with our services.**
    - This includes providing you with customer support, which requires us to access your information to assist you (such as with survey design and creation or technical troubleshooting).
    - In order to provide you with useful options to use the services together with social media and other applications, we may give you the option to export

information to, and collect information from, third party applications and websites. When exporting and collecting such information, you may be disclosing your information to the individuals or organisations responsible for operating and maintaining such third party applications and sites, and your information may be accessible by others visiting or using those applications or sites. We do not own or operate the applications or websites that you connect with, and you should review the privacy policies and statements of such websites to ensure you are comfortable with the ways in which they use the information you share with them.

- **To manage our services.** We internally use your information, including certain survey data, for the following limited purposes:
  - **To monitor, maintain, and improve our services and features.** We internally perform statistical and other analysis on information we collect (including usage data, device data, referral data, question and response data and information from page tags) to analyse and measure user behavior and trends, to understand how people use our services, and to monitor, troubleshoot and improve our services, including to help us evaluate or devise new features. We may use your information for internal purposes designed to keep our services secure and operational, such as for troubleshooting and testing purposes, and for service improvement, product updates, research and development purposes.
  - **To enforce our Terms of Service.**
  - **To prevent potentially illegal activities.**
  - **To screen for and prevent undesirable or abusive activity.**
  - **To create new services, features or content.** We may use your survey data and survey metadata (that is, data about the characteristics of a survey) for our internal purposes to create and provide new services, features or content. In relation to survey metadata, we may look at statistics like response rates, question and answer word counts, and the average number of questions in a survey and publish interesting observations about these for informational or marketing purposes. When we do this, neither individual survey creators nor survey respondents will be identified or identifiable unless we have obtained their permission.
- **To facilitate account creation and the logon process.** We link your Akvo Flow account to a third party account (Google), we use the information you allowed us to collect from those third parties to facilitate the account creation and login process.
- **To contact you about your service or account.** We occasionally send you communications of a transactional nature (e.g.

service-related announcements, billing-related matters, changes to our services or policies). You can't opt out of these communications since they are required to provide our services to you.

- **To contact you for marketing purposes.** We will only do this if you have consented to our contacting you for this purpose. For example, during the account registration process we may ask for your permission to use your information to contact you for promotional purposes, or via a form on our website. You may opt out of these communications at any time by clicking on the "unsubscribe" link in the communication.
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

**5. With whom do we share or disclose your information?**

- **We don't sell your survey data.**
- **When might we disclose your survey data to third parties?** Only for a limited number of reasons. We share your information with our service providers who help us to provide our services to you. We contractually bind these service providers to keep your information confidential and to use it only for the purpose of providing their services. By using our services, you authorise the Akvo Foundation to sub-contract in this manner on your behalf. In rare circumstances, we may share information if required by law.

**6. Sharing your surveys with the public.** From Akvo Flow it is only possible to share your surveys publicly if you have selected to add the surveys to the Akvo Flow's public map.

**7.** We recognise that you have entrusted us with safeguarding the privacy of your information. Because that trust is very important to us, the only time we will disclose or share your personal information or survey data with a third party is when we have done one of three things, in accordance with applicable law: (a) given you notice, such as in this privacy policy; (b) obtained your express consent, such as through an opt-in checkbox; or (c) de-identified or aggregated the information so that individuals or other entities cannot reasonably be identified by it. Where required by law, we will obtain your express electronic or written consent prior to disclosing or sharing any personal information.

**8.** We may disclose:

- **Your information to our service providers.** We use service providers who help us to provide you with our services. We give relevant persons working for some of these providers access to your information, but only to the extent necessary for them to perform their services for us. We also implement reasonable contractual and technical protections to ensure the confidentiality of your personal information and data is maintained, used only for the provision of their services to us, and handled in accordance with this privacy policy. Examples of service providers include cloud hosting services and web traffic analytics tools.

- **Your email address to your survey creator.** The email address under which you've registered your account is used to access surveys created by or managed by an organisation. As the surveys belong to or are controlled by an organisation, we may disclose that email address to that organisation in order to help it understand who associated with that organisation uses Akvo Flow, and to assist the organisation with its accounts.
  - **Your information if required or permitted by law.** We may disclose your information as required or permitted by law, or when we believe that disclosure is necessary to protect our rights, protect your safety or the safety of others, and/or to comply with a judicial proceeding, court order, subpoena, or other legal process served on us.
  - **Your information if there's a change in organisation ownership or structure.** If ownership of all or substantially all of our organisation changes, or we undertake a reorganisation (including a merger or consolidation) or any other action or transfer between the Akvo Foundation entities, you expressly consent to the Akvo Foundation transferring your information to the new owner or successor entity so that we can continue providing our services. If required, the Akvo Foundation will notify the applicable data protection agency in each jurisdiction of such a transfer in accordance with the notification procedures under applicable data protection laws.
9. **What are your rights to your information?** You can:
- **Update your account details.** You can update your account information by contacting your User Administrator.
  - **Access and correct your personal information.** As an account holder, you may access and correct certain personal information that the Akvo Foundation holds about you by contacting your User Administrator. Account holders and other individuals have certain legal rights to obtain information of whether we hold personal information about them, to access personal information we hold about them, and to obtain its correction, update, amendment or deletion in appropriate circumstances. For some information, these rights may be exercised through contacting your User Administrator as mentioned above, and in all cases, requests to exercise these rights may be directed to [privacy@akvo.org](mailto:privacy@akvo.org). These rights are subject to some exceptions, such as where giving you access would have an unreasonable impact on the privacy of other individuals. We will respond to your request to exercise these rights within a reasonable time and, where required by law or where we deem it otherwise appropriate and practicable to do so, we will honor your request.
  - **Download/backup your survey data.** Depending on your user permissions, we provide you with the ability to export, share and publish your survey data. This allows you to create your own backups or conduct offline data analysis.

- **Delete your survey data.** Deleting survey data will permanently delete survey data immediately. However, if your data was previously made available to the public through other means such as by sharing it on social media or uploading it to another website, this is beyond our control.
- **Cancel your account.** To cancel and delete your user account, please contact your employer who has the authority and permission to control users in the system. Deleting your account may cause all the survey data in the account to be permanently deleted from our systems within a reasonable time period, as permitted by law, and will disable your access to any other services that require an Akvo Flow account. We will respond to any such request, and any appropriate request to access, correct, update or delete your personal information within the time period specified by law (if applicable) or without excessive delay. We will promptly fulfill requests to delete personal data unless the request is not technically feasible or such data is required to be retained by law (in which case we will block access to such data, if required by law). To request all personal data be removed from the Akvo Foundation please complete the [removal form](#).

**10. For how long do we retain your data?** We generally retain your data for as long as you have an account with us (unless deleted by you), or to comply with our legal obligations, resolve disputes, or enforce our agreements. We describe our retention practices in more detail in our Retention Policy.

#### **11. Security, cookies and other important information**

- **Changes to this privacy policy.** We may modify this privacy policy at any time, but if we do so, we will notify you by publishing the changes on this website. If we determine the changes are material, we will provide you with additional, prominent notice as is appropriate under the circumstances, such as via email or in another conspicuous manner reasonably designed to notify you. If, after being informed of these changes, you do not cancel your account and continue to use our services beyond the advance-notice period, you will be considered as having expressly consented to the changes in our privacy policy. If you disagree with the terms of this privacy policy or any updated privacy policy, you may contact your User Administrator to close your account at any time.
  - **Security.** The Akvo Foundation are committed to handling your personal information and data with integrity and care. We maintain appropriate and sufficient technical and organisational security measures to protect data. However, regardless of the security protections and precautions we undertake, there is always a risk that your personal data may be viewed and used by unauthorised third parties as a result of collecting and transmitting your data through the Internet. If you have any questions about the security of your personal information, contact [Akvo Flow support](#).

- **Data locations.** Our Cloud services are based in the European Union, so your personal information will be hosted and processed by us in the European Union, unless requested otherwise. Your personal information may also be processed in, or transferred or disclosed to, countries in which the Akvo Foundation subsidiaries and offices are located and in which our service providers are located or have servers. You can view where our offices are located on the [Contact us](#) page of our Website.
- **Cookies.** We and our partners use cookies and similar technologies on our websites. Cookies are small bits of data we store on the device you use to access our services so we can recognise repeat users. Each cookie expires after a certain period of time, depending on what we use it for. We use cookies and similar technologies for several reasons:
  - **For security reasons.** We use cookies to authenticate your identity, such as confirming whether you are currently logged into Akvo Flow.
  - **To provide you with personalised content.** We may store user preferences, such as your default language, in cookies to personalise the content you see.
  - **To improve our services.** We use cookies to measure your usage of our websites and track referral data, as well as to occasionally display different versions of content to you. This information helps us to develop and improve our services and optimise the content we display to users.
  - **Piwik Pro Analytics/Matomo &/or HubSpot.** In addition to the above, we have implemented on our websites and other services certain Piwik Pro Analytics/Matomo &/or HubSpot features that support tracking visitors to our websites. You may opt out of certain types of web analytics tracking through our [Cookies policy](#) page.
  - Refer to your web browser's configuration documentation to learn how to disable cookies if you would like to block this tracking. Please note that doing this may adversely impact your ability to use our services. Enabling cookies ensures a smoother experience when using our websites. By using our websites and agreeing to this privacy policy, you expressly consent to the use of cookies as described in this policy.
- **Online Tracking.** We currently do comply with any web browser's "do not track" signal or other similar mechanism that indicates a request to disable online tracking of individual users who visit our websites or use our services.
- **Safety of Children.** Our services are not intended for and may not permissibly be used by individuals under the age of 13. The Akvo Foundation does not collect personal data from persons under 13 or allow them to register. If it comes to our attention that we have collected personal data from such a person, we may delete this

information without notice. It is the responsibility of the survey creator to ensure that they have obtained the required legal consent for personal data collection of children. If you have reason to believe that this has occurred illegally, please contact our Data Compliance Coordinator on [privacy@akvo.org](mailto:privacy@akvo.org).

- **English version controls.** Non-English translations of this privacy policy will be provided for convenience. In the event of any ambiguity or conflict between translations, the English version is authoritative.

## 12. Additional information for European Union users

Akvo Flow provides services to users through **The Akvo Foundation, 's-Gravenhekje 1A, 1011 TG Amsterdam, The Netherlands.**

- **“Personal data”.** For users located in the EU, references to “personal information” in this policy are equivalent to what is commonly referred to as “personal data” in the EU.
- **About IP addresses.** Our servers record the incoming IP addresses of visitors to our websites (whether or not the visitor has an Akvo Flow account) and store the IP addresses in log files. We use these log files for purposes such as system administration and maintenance, record keeping, tracking referring web sites, inferring country/city location, and security purposes (e.g. controlling abuse, spam and DDOS attacks). By agreeing to this privacy policy, you expressly consent to Akvo Flow using your IP address for the foregoing purposes.
- **Data controller.** The Akvo Foundation, whose contact information is listed above, is the data controller for registration, billing and other account information that we collect from users in the EU. **However, the data controller for survey data is the survey creator.** The survey creator determines how their survey questions and responses are used and disclosed. The Akvo Foundation only processes such survey data via Akvo Flow in accordance with the instructions and permissions (including those given under this privacy policy) selected by the Akvo Flow User when they create and administer their survey.
- **Accessing and correcting your personal data.** You have the right to access and correct the personal information that the Akvo Foundation holds about you. This right may be exercised by contacting your User Administrator or by contacting [privacy@akvo.org](mailto:privacy@akvo.org).
- **Your responsibilities.** By using our services, you agree to comply with applicable data protection requirements when collecting and using your survey data, such as requirements to collect consent, inform respondents about the specific uses and disclosures of their data.

## 13. Consents. By acceptance of this privacy policy, you expressly consent to the following:

- You consent to the collection, use, disclosure and processing of your personal data in the manner described in this privacy policy, including our procedures relating to cookies, IP addresses and log files.
- Our Cloud hosted servers are based in the European Union, so your personal data will be primarily processed by us in the European Union. You consent to the transfer and processing of your personal data in the European Union by the Akvo Foundation and in the data locations identified in Section 5 by our various affiliates and service providers.
- You consent and agree that we may transfer your data to data processors located in countries upon your instruction.
- You consent to us sharing your personal data with relevant persons working for service providers who assist us to provide our services.
- If you have enabled cookies on your web browser, you consent to our use of cookies as described in this privacy policy.

## PRIVACY FOR SURVEY RESPONDENTS

### 1. Who is the 'Survey Creator'?

- The Survey Creator is the organisation undertaking the survey.

### 2. What information does Akvo Flow collect?

- When you respond to surveys hosted by Akvo Flow, we collect, on behalf and upon instructions (including the ones provided in this privacy policy) of survey creators, information relating to you. The sections afterward describe what we do with this information.

### 3. Information we process about you

- **Survey responses.** We collect and store the survey responses that the survey creator collects. The survey creator is responsible for this data and manages it. A survey may ask you to provide personal information or data. If you have any questions about a survey you are taking, please contact the survey creator directly as the Akvo Foundation is not responsible for the content of that survey. The survey creator is usually the organisation that invited you to take the survey and sometimes they have their own privacy policy.

### 4. Are your survey responses anonymous? This depends on how the survey was created. Contact the Survey Creator to find out.

### 5. Providing survey responses is voluntary. Remember, you can always choose not to provide an answer to any given survey question (especially those requesting your personal information or data). However, sometimes this will prevent you from completing or partaking in a survey if the survey creator has marked that question as requiring an answer.

### 6. How does the Akvo Foundation use the information we collect?

- **Your survey responses are owned and managed by the Survey Creator,** and we treat that information as private to the Survey Creator, except if the Akvo Flow User has made the questions and responses available via the Akvo Flow public map. Please contact the Survey Creator directly to

understand how they will use your survey responses. Some Survey Creators may provide you with a privacy policy or notice at the time you take their survey and we encourage you to review that to understand how the Survey Creator will handle your responses. **Please see the Survey Creator version of this privacy policy to understand how Akvo Flow handles survey responses.** Akvo Flow does not sell survey responses to third parties and we do not use any contact details collected in our partners' surveys to contact survey respondents.

#### 7. With whom do we share or disclose your information?

- **The Akvo Foundation does not sell your survey responses!** We will share your survey responses with third parties only as described in this privacy policy.
- We disclose:
  - **Your survey responses to Survey Creators.** We host surveys for Survey Creators, but they are really the primary curator of survey data. Anything you expressly disclose in your survey responses will, naturally, be provided to that organisation. Please contact the survey creator directly to understand how they might share your survey responses. Please see the Survey Creator version of this privacy policy to understand what Akvo Flow tells survey creators about how we handle survey responses, and to whom the Akvo Foundation may disclose survey responses.

#### 8. What are your rights to your information?

- **Contact the Survey Creator to access and correct your responses and personal information.** Because we collect survey responses on behalf of survey creators, you will need to contact the survey creator if you have any questions about the survey, or if you want to access, update, or delete anything in your responses. We provide survey creators with tools to maintain the responses they collect through their surveys. You may request access to and correction of the personal information we hold about you by contacting [privacy@akvo.org](mailto:privacy@akvo.org), but in most cases the Akvo Foundation cannot provide you with this access since survey responses are the survey creator's private information (except if the survey creator has made the questions and responses available via an Akvo Flow public map) and giving you access may have an unreasonable impact on the privacy of other individuals. We will respond to your request for access or correction within a reasonable time and, where reasonable and practicable to do so, with the Survey Creator's electronic or written permission, we will provide access to your personal information in the manner requested by you.

#### 9. Security, cookies and other important information

- **Changes to this privacy policy.** We may modify this privacy policy at any time, but if we do so, we will notify you by publishing the changes on our website.
- **Security.** The Akvo Foundation are committed to handling your personal information and data with integrity and care. We maintain appropriate and sufficient technical and organisational security measures to protect

your data. However, regardless of the security protections and precautions we undertake, there is always a risk that your personal data may be viewed and used by unauthorised third parties as a result of collecting and transmitting your data through the Internet. If you have any questions about the security of your personal information, contact the [Akvo Flow Support](#) team.

- **Data locations.** Our Cloud hosted data is stored in the European Union, so your personal information will be hosted and processed by us in the EU. Your personal information may also be processed in, or transferred or disclosed to, countries in which the Akvo Foundation subsidiaries and offices are located and in which our service providers are located or have services. You can view where our offices are located on the [Contact Us](#) page of our website.
- **Safety of Children.** Our services are not intended for and may not permissibly be used by individuals under the age of 13. The Akvo Foundation does not collect personal data from persons under 13 or allow them to register. If it comes to our attention that we have collected personal data from such a person, we may delete this information without notice. It is the responsibility of the survey creator to ensure that they have obtained the required legal consent for personal data collection of children. If you have reason to believe that this has occurred illegally, please contact our Data Compliance Coordinator on [privacy@akvo.org](mailto:privacy@akvo.org).
- **English version controls.** Non-English translations of this privacy policy are provided for convenience. In the event of any ambiguity or conflict between translations, the English version is authoritative.

#### 10. Additional information for European Union users

- The Akvo Foundation provides its services to users in the EU through **Akvo Foundation, 's-Gravenhekje 1A, 1011 TG Amsterdam, The Netherlands**
  - **“Personal data”.** For users located in the EU, references to “personal information” in this policy are equivalent to what is commonly referred to as “personal data” in the EU.
  - **About IP addresses.** Our servers record the incoming IP addresses of visitors to our websites (whether or not the visitor has an Akvo Foundation account) and store the IP addresses in log files. We use these log files for purposes such as system administration and maintenance, record keeping, tracking referring web sites, inferring your location, and security purposes (e.g. controlling abuse, spam and DDOS attacks). We also store IP addresses along with certain actions you take on our system. IP addresses are only linked to survey responses if a survey creator has configured a survey to collect IP addresses. By agreeing to this privacy policy, you expressly consent to the Akvo Foundation using your IP address for the foregoing purposes.
  - **Data controller.** The Akvo Foundation, whose contact information is listed above, is the data controller for registration, billing and other account information that we collect from users in the EU. However, the data controller for survey data is the survey creator. The survey creator determines how their survey questions and responses are

used and disclosed. The Akvo Foundation only processes such survey data in accordance with the instructions and permissions (including those given under this privacy policy) selected by the survey creator when they create and administer their survey.

- **Accessing and correcting your personal data.** You have the right to access and correct the personal information that the Akvo Foundation holds about you. This right may be exercised by contacting [privacy@akvo.org](mailto:privacy@akvo.org).
- Our servers are hosted in the EU, so your personal data will be primarily processed by us in the EU. You consent to the transfer and processing of your personal data in the EU.