

Akvo General Privacy Policy

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Document Control

Version History

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1	Final		Lynn Brannstrom



Key Privacy Points: The Stuff You Really Care About

IF YOU USE OUR SERVICES:

- **Your imported data is owned by you.** Not only that, but the Akvo Foundation treats your data as if they were private (except if you have made the data available publicly). We don't sell them to anyone and we don't use the data you import 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.** The Akvo Foundation maintains appropriate and sufficient technical and organisational security measures to protect data.
- **Your data is stored on servers located in the European Union.** The Akvo Foundation will process your data on your behalf and under your instructions (including the ones agreed to in this privacy policy).

IF YOU VISIT OUR WEBSITES OR WORK WITH OUR PARTNER ORGANISATIONS:

- **Data are administered by our Partners.** Our Partners use our services every day. We host their data on our websites and collect visitor analytics. If you have questions about any Partner data, please contact the creator directly as The Akvo Foundation is not responsible for their content. The creator is usually the organisation that collects the data and sometimes they have their own privacy policy.
- **Data administered by the Akvo Foundation.** We add content and data to our websites and collect visitor analytics. If you have questions about any data collected, please contact our Data Compliance Coordinator on privacy@akvo.org.
- **Are your visits anonymous?** The Akvo Foundation tracks visits to our websites. We track IP addresses, location (country/city) as well as browser, device and settings information to improve the service we deliver. IP address data collected for web analytics are anonymised.
- **We don't sell your data to third parties.** The Akvo Foundation doesn't sell or share your data with third party advertisers or marketers. Furthermore, the Akvo Foundation merely acts as a custodian of our Partner's data, except as further described in this privacy policy with regard to data made public by our Partners.
- If you think any data violates our Terms of Service or may be part of an illegal activity, report it to privacy@akvo.org.



Detailed Privacy Points: The long read

If you use our services

1. What information does the Akvo Foundation collect?

- When you use an Akvo service, 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 account before you can use our services. When you register for an account, we collect your username and email address. Your account is created using our self-hosted Identity and Access Management Solution, the service itself or via a third party sign in option depending on the service.
- **Account settings.** You can set various preferences and personal details on pages like your account settings page or through your assigned User Administrator, depending on which service you are using.
- **Data storage.** We store your data on servers located in the European Union, 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 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.

- **Referral data.** If you arrive at an Akvo Foundation 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, you have the option of registering and signing into our Akvo Flow service 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 the Akvo Foundation 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 the Akvo Foundation use the information we collect?**

- **We treat your data as information that is private unless made available by you via a public link.** We know that, in many cases, you want to keep your data (which we collectively refer to as “data”) private. Unless you decide to share your data with the public (such as by making the visualisations available via a shared link, embedded on a website, etc), we do not use your data other than as described in this privacy policy or unless we have your express consent. We do not sell your 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 organisation (which we refer to as “Our Partner/s”).** 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 data that you have chosen to make available online through a public link.
- **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 visualisation design, survey queries, project reporting 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 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, 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 within our services. 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 update information, 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 data and metadata (that is, data about the characteristics of a service) for our internal purposes to create and provide new services, features or content. In relation to metadata, we may look at statistics such as the average number of questions in a survey and publish interesting observations about these for informational or marketing purposes. When we do this, individual creators will not be identified or identifiable unless we have obtained their permission.
- **To facilitate account creation and the logon process.** We create your Akvo services in our self-hosted Identity and Access Management solution, directly within our platforms or via third party sign in functionality.

- **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 data.**
 - **When might we disclose your 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 data with the public.** You are able to control how your data is shared publicly from our services. The Akvo Foundation would only share public data.
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 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 organisation.** We may disclose the email address under which you've registered an Akvo account, to the partner organisation, in order to help them understand who associated with that organisation uses Akvo services, 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 may:

- **Update your account details.** You can set various preferences and personal details on pages like your account settings page or through your assigned User Administrator, depending on which service you are using.
- **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 setting various preferences and personal details on pages like your account settings page or through your assigned User Administrator, depending on which service you are using.
- 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 setting various preferences and personal details on pages like your account settings page or through your assigned User Administrator, depending on which service you are using as mentioned above, and in all cases, requests to exercise these rights

may be directed to 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 honour your request.

- **Delete your data.** To the extent permitted by law, we will permanently delete your data if you request to cancel your account, taking into account our retention policy. However, if your data was previously made available to the public through a public link, additional copies of your data may remain available on the Internet even after your account has been deleted.
- **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 relevant Akvo service. Deleting your account may cause all the data in the account to be permanently deleted from our systems within a reasonable time period, as permitted by law, and may disable your access to any other services that require an Akvo 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 retain your data for as long as you have an account with us, or to comply with our legal obligations, resolve disputes, or enforce our agreements. Data that is deleted from our servers may remain as residual copies on offsite backup media up to 12 months afterward. 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 our 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 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 privacy@akvo.org.
- **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. 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:
 - To make our sites easier to use. We may store your username in a cookie to make it quicker for you to sign in whenever you return to an Akvo service.
 - For security reasons. We use cookies to authenticate your identity, such as confirming whether you are currently logged into an Akvo service.
 - 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 knowingly collect personal data from persons under 13 or allow them to register. If it comes to our attention that we have collected or processed personal data from such a person, we may delete this information without notice. If you have reason to believe that this has occurred, please contact our Data Compliance Coordinator on 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.

12. Additional information for European Union users

- The Akvo Foundation provides services to users through **Akvo Foundation|Mindspace Dam | Nieuwezijds Voorburgwal 162 | 1012 SJ 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 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 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 data imported into one of the Akvo services is the Partner organisation.** The partner determines how their data are used and disclosed. The Akvo Foundation only processes such data via Akvo services in



accordance with the instructions and permissions (including those given under this privacy policy) selected by the organisation when they create and administer their data.

- 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 visiting your account details or by contacting privacy@akvo.org.
- Your responsibilities. By using our services, you agree to comply with applicable data protection requirements when collecting and using your visualisation 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 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 if you visit our websites or work with our Partner organisations

1. What information does the Akvo Foundation collect?

- When you visit websites hosted by the Akvo Foundation, we collect, on behalf and upon instructions (including the ones provided in this privacy policy) 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 process about you

- **Data Storage.** We store the data our Partners collect. The creator organisation is responsible for this data and manages it. An organisation may ask you to provide personal information or data. If you have any questions about data you are being asked for, please contact the creator organisation directly as the Akvo Foundation is not



responsible for the content created by our Partners. The creator is usually the same organisation that invited you to provide data and sometimes they have their own privacy policy.

- **Providing responses or data is voluntary.** Remember, you can always choose not to provide an answer to any given question or request (especially those requesting your personal information or data).

3. How does the Akvo Foundation use the information our Partners collect?

- **All data collected by the creator or Partner organisation is treated as private and owned by the creator or Partner organisation, except if the creator has made the data available via a public link.** Please contact the creator directly to understand how they will use your responses. Some creators may provide you with a privacy policy or notice at the time they request your information and we encourage you to review that to understand how the creator will handle your data.
- **Please see the “If you use our services” section of this privacy policy to understand how the Akvo Foundation handles Partner organisation data.** The Akvo Foundation does not sell data to third parties and we do not use any contact details collected by our partners.

4. With whom do we share or disclose your information?

- **The Akvo Foundation does not sell your data!** We will share data with third parties only as described in this privacy policy.

5. We disclose:

- **Your requests for changes or removal of data collected by our Partners.** We host data for creators or Partner organisations, but they are really the primary curator of the data. Any changes requested will, naturally, be provided to them. Please contact the creator or Partner organisation directly to understand how they might share your data. Please see the “**If you use our services**” section of this privacy policy to understand what the Akvo Foundation tells Partner organisations about how we handle their data, and to whom the Akvo Foundation may disclose data.

6. What are your rights to your information?

- **Contact the creator or Partner organisation to access and correct your personal information.** Because we process data on behalf of creators or Partner organisations, you will need to contact the creator or Partner organisation if you have any questions about the data, or if you want to access, update, or delete anything. We provide creators with tools to maintain the information they collect through our Akvo services. You may, also, request access to and correction of the personal information we hold about you by contacting privacy@akvo.org, but in most cases the Akvo Foundation

cannot provide you with this access since the creator or Partner organisation own the private information (except if they have made the data available via a public link) 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 creator or Partner organisation's electronic or written permission, we will provide access to your personal information in the manner requested by you.

7. **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.** We 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 privacy@akvo.org.
- **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.
- **Blogs and Forums.** Our websites may offer publicly accessible blogs and community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. We're not responsible for any personal information you choose to submit in these areas of our site. To request removal of your personal information from our blog or community forum, by using our [removal form](#). In some cases, we may not be able to fulfill your request and we will let you know why. Commenting systems on our blogs are managed by a third party application that may require you to register to post a comment. Please review that application's privacy policy to learn how the third party uses your information.
- **Social Media Features.** Our websites may include social media features or widgets, such as the Facebook Like button. Use of these features may allow them to collect your IP address, detect which page you are visiting on our site, and set a cookie to enable the



feature to function properly. Your interactions with these features are governed by the privacy policy of the third party providing it.

- **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 creator or Partner organisation 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.
- **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.

8. 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. 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 Akvo service’s data is the creator or Partner organisation. The creator or Partner organisation determines how their data are used and disclosed. The Akvo Foundation only processes such data in accordance with the instructions and permissions (including those given under this privacy policy)



selected by the creator or Partner organisation when they create and administer their data.

- **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.
9. **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 by the Akvo Foundation. and in the data locations identified in Section 5 by our various affiliates and service providers.