

# Akvo Lumen

# Privacy Policy

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## Document Control

### Version History

Version	Status	Reason for change	Changes done by
1	Final		Lynn Brannstrom
1.1	Final	Contributions by Nadia added	Lynn Brannstrom



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

### DEFINITIONS:

- Visualisation data:** All data, text, images or other materials created or imported into Akvo Lumen is referred to as “Visualisation data” throughout this Policy.
- Creator:** Akvo Lumen User or Organisation who creates visualisations

### IF YOU ARE AN AKVO LUMEN USER:

- **Your visualisation data is owned by you.** Not only that, but the Akvo Foundation treats your visualisations as if they were private (except if you have selected to share the visualisations to the Akvo Lumen’s publicly via a URL or embed code). We don’t sell them to anyone and we don’t use the visualisation 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.
- **Visualisation data is stored on servers located in the European Union.** The Akvo Foundation will process your visualisation data on your behalf and under your instructions (including the ones agreed to in this privacy policy).

### IF YOU VIEW VISUALISATIONS AND PUBLICLY SHARED DATA:

- **Visualisations are administered by Akvo Lumen Users.** Akvo Lumen Users create thousands of visualisations each day using our services. We host the visualisations on our websites and collect visitor web analytics. If you have any questions about a visualisation, please contact the visualisation creator directly as The Akvo Foundation is not responsible for the content of that visualisation. The visualisation creator is usually the organisation that has publicly shared the visualisation and sometimes they have their own privacy policy.
- **We don’t sell your data to third parties.** The Akvo Foundation doesn’t sell or share your visitor data with third party advertisers or marketers (although the visualisation creator might, so check with them). The Akvo Foundation merely acts as a custodian on behalf of the visualisation creator who controls your data, except as further described in this privacy policy with regard to visualisations shared from Akvo Lumen via a public URL or embed code.



- If you think a visualisation 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 LUMEN USERS:

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

- When you use Akvo Lumen, 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 Lumen account before you can create or manage visualisations on Akvo Lumen. When you register for an account, we collect your username and email address. Your account is created using our self-hosted Identity & Access Management solution. An email is sent to you for verification of the account.
- **Account settings.** You can update your user settings from within Akvo Lumen via our self-hosted Identity and Access Management software.
- **Visualisation data.** We store your visualisation data 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 Lumen 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.
- **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 Lumen 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 Lumen use the information we collect?**

- **We treat your visualisation data as information that is private to you (except if you have selected to share the visualisations from Akvo Lumen via a public URL or embed code).** We know that, in many cases, you want to keep your visualisation data (which we collectively refer to as “visualisation data”) private. Unless you decide to share your visualisation responses with the public (such as by making the visualisation public via a shared URL or embed code on a website), we do not use your visualisation data other than as described in this privacy policy or unless we have your express consent. We do not sell your visualisation 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. 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 visualisation data you have selected to share from Akvo Lumen via a public URL or embed code.
- **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 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 visualisation 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, visualisation 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 visualisation data and visualisation metadata (that is, data about the characteristics of a visualisation) for our internal purposes to create and provide new services, features or content. In relation to visualisation metadata, we may look at statistics like view rates, data point counts, and the average number of columns in a visualisation and publish interesting observations about these for informational or marketing purposes. When we do this, neither individual visualisation creators nor visualisation data will be identified or identifiable unless we have obtained permission.
- **To facilitate account creation and the logon process.** We link your Akvo Lumen account to our self-hosted Identity and Access Management solution we use the information you allowed us to collect 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. You may opt out of these communications at any time by clicking on the "unsubscribe" link in the communication sent to you.
  - **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 visualisation data.**
  - **When might we disclose your visualisation 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 visualisations with the public. From Akvo Lumen it is only possible to share your visualisations publicly if you have selected to share the visualisations from Akvo Lumen via a public URL or embed code.
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 visualisation 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.** The email address under which you've registered your account is used to access visualisations created by or managed by an organisation. As the visualisations 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 Lumen, 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 logging into your Akvo Lumen account.
- **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 logging into your Akvo Lumen account. 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 updating your user account 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.

- **Delete your visualisation data.** Deleting visualisation data will delete the visualisation data from Lumen immediately. We may retain your deleted data for a limited time inline with our backup retention policy. If you deleted something by accident and need to restore it contact the Akvo Lumen Support Team. To the extent permitted by law, we will permanently delete your data if you request to cancel your account. 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 visualisation 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 Lumen 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. Data that is deleted from our servers may remain as residual copies on offsite backup media for up to approximately 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 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.** Details about the Akvo Foundation's security practices are available in our Security Statement. We are committed to handling your personal information and data with integrity and care. 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 Lumen 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 Lumen.
  - **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 visualisation 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 [gdpr@akvo.org](mailto:gdpr@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

Akvo Lumen provides services to users through The **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 Lumen 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 Lumen 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 visualisation data is the visualisation creator.** The visualisation creator determines how their visualisation data are used and disclosed. The Akvo Foundation only processes such visualisation data via Akvo Lumen in accordance with the instructions and permissions (including



those given under this privacy policy) selected by the Akvo Lumen User when they create and administer their visualisation.

- **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 visualisation data, such as requirements to collect consent, inform respondents about the specific uses and disclosures of their data.

13. Consents. By setting up your user account you are indicating your 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 VIEWING VISUALISATIONS AND FOR PUBLICLY SHARED DATA

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

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

### 2. Information we process about you

- **Visualisation data.** We collect and store the visualisation data that the visualisation creator imports. The visualisation creator is responsible for this data and manages it. If you have any questions about a visualisation, please contact the visualisation creator directly as the Akvo Foundation is not responsible for the content of that visualisation.



The visualisation creator is usually the organisation that shared the visualisation and sometimes they have their own privacy policy.

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

- **Your visualisation data are owned and managed by the visualisation creator, and we treat that information as private to the visualisation creator, except if the Akvo Lumen User has shared the visualisations from Akvo Lumen via a public URL or embed code.** Please contact the visualisation creator directly to understand how they will use visualisation data. Some visualisation creators have their own privacy policy we encourage you to review that to understand how the visualisation creator handles the visualisation data. **Please see the visualisation Creator version of this privacy policy to understand how Akvo Lumen handles visualisation data.** Akvo Lumen does not sell visualisation 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 visualisation views!** We will share your visualisation views with third parties only as described in this privacy policy.

### **5. We disclose:**

- **Your visualisation views to visualisation creators.** We host visualisations for visualisation creators, but they are really the primary curator of visualisation data. Your view data will, naturally, be provided to that organisation. Please contact the visualisation creator directly to understand how they might share your visualisation views. Please see the **PRIVACY FOR AKVO LUMEN USERS** portion of this privacy policy to understand what Akvo Lumen tells visualisation Akvo Lumen users about how we handle visualisation data, and to whom the Akvo Foundation may disclose visualisation data.

### **6. What are your rights to your information?**

- **Contact the visualisation creator to access and correct your data and personal information.** Because we collect visualisation responses on behalf of visualisation creators, you will need to contact the visualisation creator if you have any questions about the visualisation, or if you want to access, update, or delete anything in the data. We provide visualisation creators with tools to maintain the data they import for their visualisations. 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 visualisation responses are the visualisation creator's private information (except if the visualisation creator has shared the visualisations from Akvo Lumen via a public URL or embed code) 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 visualisation Creator'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.** Details about the Akvo Foundation's security practices are available in our Security Statement. We are committed to handling your personal information and data with integrity and care. 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 Lumen 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.
- **Social Media Features.** Our websites may include social media features or widgets, such as the Facebook Like or Twitter share buttons. 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.
- **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 visualisation 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 [gdpr@akvo.org](mailto:gdpr@akvo.org).



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## **8. Additional information for European Union users**

- The Akvo Foundation provides its services to users in the EU 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 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 visualisation responses if a visualisation creator has configured a visualisation 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 visualisation data is the visualisation creator. The visualisation creator determines how their visualisation questions and responses are used and disclosed. The Akvo Foundation only processes such visualisation data in accordance with the instructions and permissions (including those given under this privacy policy) selected by the visualisation creator when they create and administer their visualisation.
- **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.