

The Citizens Privacy and Cookie Policy

Introduction

The Citizens is a new non-profit organization that seeks to protect democracy from big data and misinformation. Our members investigate and expose wrongdoing and push for litigation that will enshrine fairer policies in the law.

This Privacy Policy (“Policy”) is intended to inform you about the data processing we undertake through The Citizens website.

This Policy does not address our other personal data processing operations including our journalism and public litigation work or employment and volunteer recruitment. Additional policies and procedures are in place to address those operations and we provide relevant information to data subjects and the point of data collection, or subsequently as required by law.

This Policy is subject to regular review. Updates and amendments will be documented below and communicated to data subjects where required.

Data controller

The Citizens (“we”, “us”, “our”) is the data controller of data processed in connection with this Policy. We are registered in the UK with Companies House as *All the Citizens Ltd*, company number is 12203634.

Any questions regarding this Policy or any other data protection issue should be submitted via email to privacy@the-citizens.com or via post to 51 Clarkegrove Road, Sheffield, United Kingdom, S10 2NH.

Guiding principles

The Citizens is committed to respecting the right to privacy. We protect and maintain the security of all personal data and institute technical and organisational measures to ensure this. The Citizens is aware of its obligations to a global audience, and makes efforts towards transparency, data accuracy, minimisation and limited retention – we aim to only collect personal data that is necessary for our particular processing activities and retain that data only as long as is required. We will never sell your data, and do not share, transfer or otherwise grant third parties access to personal data except as explicitly detailed in this Policy.

What we process and why

Website

We use cookies on our website – these include essential and non-essential cookies. Any non-essential cookies are dropped on the basis of your consent. More information about the cookies we use is provided in the Cookie section below.

Mailing list and emails

We send out newsletters to keep our network informed of our work and campaigns. On the basis of your consent, we collect your name and email address from you for this purpose. You can withdraw

your consent at any time by unsubscribing to the mailing list through the link provided in our newsletters.

Social media contact

We use social media platforms including Facebook and Twitter to promote our work. If you stay in touch with us using these platforms, the primary relationship from a data processing perspective is between the platform and you, as a platform account holder. If you reach out to us via social media platforms, we will retain copies of your messages in order to respond to you.

Campaigns

From time to time we run campaigns in order to draw awareness to particular issues at the intersection of big data and democracy. If you sign up to take part in a campaign, on the basis of your consent, we will collect your name and email address from you in order to contact you for this purpose. You can withdraw your consent at any time by unsubscribing to the mailing list through the link provided in our newsletters.

Donations

The Citizens currently takes donations to fund its research and campaigns. Where you make a donation to us, we will collect your name, contact and payment details. Payment is processed by PayPal. We process this information on the basis of your consent, and we retain records of donations in line with legal obligations on us related to taxation and accounting.

Data retention

In general, data will be retained for as long as is necessary to fulfil the purpose for which it was collected. Where data is collected on the basis of consent, which applies to mailing list subscriptions, we retain it until you withdraw your consent or otherwise when the data becomes no longer relevant for the purpose for which it was collected. Some data is retained in line with legal obligations on us, for example tax record keeping connected with receiving donations, and it will be deleted at the end of the relevant period required by law.

Sensitive data

The Citizens does not collect any sensitive data within the definition of EU or UK data protection laws. While our work focuses on holding governments, companies and individuals with power to account, we are not affiliated with any political organisation and do not request data that explicitly reveals political affiliations or opinions.

Tracking & cookies

Cookies are small files which are deployed by a website and saved to your device allowing your device to be recognised by that website. We use cookies on our website – some of these are necessary to allow the website to function and others allow us to track how visitors engage with the website. All non-essential cookies are deployed on the basis of your consent.

The tables below set out the cookies we use:

Essential cookies

These cookies are necessary for the website to function and cannot be switched off or opted-out of.

Provider	Cookie	Purpose
the-citizens.org	-test-amp-cookie-tmp amp-consent	Improves website speed and implements content through a Content Delivery Network. Provides the ability to collect and store a user's consent through a UI control. Also provides the ability to block other AMP components based on the user's consent.

Marketing cookies

Marketing cookies deployed through our website are connected to embedded YouTube videos. These cookies are set through our site by advertising partners and may be used to build a profile of your interests and show you relevant ads on other sites. They don't store directly personal information but they are based on uniquely identifying your browser and internet device.

Provider	Cookie	Purpose
doubleclick.net	test_cookie, IDE	Used by Google DoubleClick to register and report the website user's actions after viewing or clicking on advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user. Used to check if the user's browser supports cookies.
youtube.com	GPS, visitor_info1_live, YSC, yt-remote-cast-installed, yt-remote-connected-devices, yt-remote-device-id, yt-remote-fast-check-period, yt-remote-session-app, yt-remote-session-name	Cookies deployed by embedded YouTube videos used to enable tracking based on geographical GPS location, estimate user bandwidth on pages with integrated videos, register a unique ID to keep statistics of what videos from YouTube the user has seen and store the user's video player

		preferences using embedded YouTube video.
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Opting in and out of cookies

When you visit our websites for the first time, a cookie consent box appears allowing you to provide your consent to non-essential cookies (opting-in) or to reject the cookies (opting-out). By default, non-essential cookies are disabled. You can access this box and opt-in or out at any time – it appears at the bottom of the page.

Information security

We take all reasonable steps to ensure that personal data is processed in accordance with this policy. The technical and organisational measures to prevent unauthorised access to personal data include limiting staff and third-party access to personal data in accordance with specific job responsibilities or contractual obligations, the encryption of data where possible, the institution of security protocols and staff training. Although we do our best to protect personal data, information transmitted over the internet remains vulnerable to interception – for this reason, the transmission of any personal data to our websites or via email to us is therefore at the data subjects’ own risk.

Data sharing, processors and international transfers of data

We work with select third party providers who process data on our behalf. These include Mailchimp, WordPress, and others who provide mailing list, website and content management systems and services. We share data with these providers on the basis of our legitimate interests in delivering our website and campaigns. These providers have safeguard in place to ensure that data is protected and treated in compliance with applicable data protection laws and standards, including in relation to the international transfer of data.

External websites

Our websites include links to external websites which may process your data or use cookies - for example links to external resources and donation platforms in connection with campaigns. You can find out more about these services and their use of cookies through their respective websites and privacy policies. Please remember we cannot control the way those external websites collect and retain your personal data, so you use those external services at your own risk.

Your rights

Individuals whose data is processed by The Citizens have the following rights available:

- The right to be informed as to whether The Citizens holds data about them;
- The right of access to that information;
- The right to have inaccurate data corrected;
- The right to have their data deleted;
- The right to opt-out of particular data processing operations;
- The right to receive their data in a form that makes it “portable”;
- The right to object to data processing;

- The right to receive an explanation about any automated decision making and/or profiling, and to challenge those decisions where appropriate.

To make a request or complaint related to the processing of your personal data contact privacy@the-citizens.com

Changes and revisions

This policy may be updated from time to time. The date and nature of changes made will be listed below.

Policy published 25 September 2020.