

Guardian Crowd - Privacy Policy

This privacy policy applies to the services on theguardiancrowd.com (“our site”) as provided by Guardian News & Media Limited (“GNM”). It explains how we (Guardian News & Media Limited) collect, use, share and transfer your personal data when you use the services provided on theguardiancrowd.com.

Personal data is any information about you by which you can be identified. This can include information such as:

- your name, date of birth, email address, postal address, phone number, mobile number;
- information about your device (such as the IP address, which is a numerical code to identify your device that can provide information about the country, region or city where you are based); and
- as well as information relating to your personal circumstances and how you use our site and services.

Sometimes our site may contain links to third party sites and services. These sites and services have their own privacy policies. So, if you follow a link to a third party, you should read the privacy policy shown on their at site.

Who we are

The data controller for our site is Guardian News & Media Limited, Kings Place, 90 York Way, London N1 9GU. This means that we are responsible for deciding how and why we hold and use your personal data. If you want to contact us, you can find our contact details in the “How to contact us” section below.

Collecting and using your personal data

The Guardian Crowd is our insight community. When you register you will be asked to become a member and to complete regular surveys. We will use the insight gained from the survey results to improve our products and services.

The personal data we collect when you register to use the site and through the initial registration survey:

When you first register for Guardian Crowd, we will also ask you to complete a brief initial survey. We collect the following personal data, through the initial survey:

- your name;
- your email address;
- your gender;
- your date of birth;
- the region you live in;
- your employment status; and
- information on how you use Guardian content and on what media platform/s.

For certain surveys, we may make a forum available where members can participate in a discussion. When you register as a member you will be asked to select a screen name which will be visible to others when you post information on your member page.

We will also store and use any additional personal data you provide to us, when you complete one of our surveys or when you upload a comment or other

content on Guardian Crowd.

When you post personal data on one of our forums, this is visible on the portal. This means that people reading your posts and looking at the forums will see your user name. This includes other people posting as well as those who work to moderate the Guardian Crowd and offer support services.

Additional information we collect when you use our site or our apps

When you use our site we may also collect additional personal data including:

- your IP address (a numerical code to identify your device and which can provide information about the country, region or city where you are based;
- the browsing history of the content you have visited on our site, including information on how you were referred to our site via another website; and
- details of your devices, for example, the unique device ID and browsers used to access our content.

We will not collect special categories of data, such as information about your race, political opinions, religion, health or sexual orientation, unless you have chosen to provide that information to us as part of a particular survey.

Updating your personal data and your profile page

When you register with the Guardian Crowd, you have access to a profile page. You can update personal data we hold about you, such as your name and email address under the “User Profile Information” section of your profile page when you are logged into the site.

Why we use your personal data

We process personal data through our site for a number of purposes, including the following:

- to enable you to register as a member on Guardian Crowd;
- to ensure that we invite you to surveys that are relevant to you;
- to invite you to complete new surveys via email or to let you know about a new survey or a survey result;
- to enter you into our regular prize draws;
- to let you participate in a discussion by posting or uploading photos and videos on one of our forums;
- for statistical purposes such as analysing our site’s performance and to understand how members use our site;
- for security and fraud prevention and to ensure that our site is secure and used in line with our terms of use; and
- to comply with applicable laws and regulations.

Legal grounds for using your personal data

We will only use your personal data where we have a legal ground to do so. We determine the legal grounds based on the purposes for which we have collected and use your personal data. In every case, the legal ground will be one of the following:

- **Performance of a contract with you:** For example, when you register to become a member of Guardian Crowd.
- **Consent:** For example, where we invite you to complete a new survey.
- **Our legitimate interest:** For example, when we enter you into one of our prize draws. It is also in our legitimate interest to analyse what content has been viewed on our site, so that we can understand how our site is used.

- **Compliance with law:** In some cases, we may have a legal obligation to use or keep your personal data.

Using children's data

Guardian Crowd is not intended for, and should not be used by, anyone under the age of 16. We do not knowingly collect personal data about anyone under the age of 16.

Security of your personal data

We have implemented appropriate technical and organisational controls to protect your personal data against unauthorised processing and against accidental loss, damage or destruction. You are responsible for choosing a secure password when we ask you to set up a password to access our site. You should keep this password confidential and you should choose a password that you do not use on any other site. You should not share your password with anyone else, including anyone who works for us. Unfortunately, sending information via the internet is not completely secure. Although we will do our best to protect your personal data once with us, we cannot guarantee the security of any personal data sent to our site while still in transit and so you provide it at your own risk.

Who we share your personal data with

Depending on where you live, we may share your personal data with other Guardian companies that are based in the UK and the United States.

We do not share your personal data with other people or companies that are not directly linked to us except under the following circumstances:

- We use a third party service provider, Vision Critical, to manage our site and develop surveys on our behalf.
- We use other organisations to offer support services to members of the Guardian Crowd and to act as moderators for the forums. They will see the public information from your profile, for example your screen name and posts, but they will not see the responses to the surveys you complete.
- We may reveal your personal data to any law enforcement agency, court, regulator, government authority or other organisation if we believe we need to do so to keep to a legal or regulatory obligation, or otherwise to protect our rights or the rights of anyone else.
- We may reveal your personal data to any other organisation that buys, or to which we transfer all, or substantially all, of our assets and business. If this sale or transfer takes place, we will use reasonable efforts to try to make sure that the organisation we transfer your personal data to uses it in line with this privacy policy.

Any organisations that accesses your personal data in the course of providing services on our behalf will be governed by strict contractual restrictions to make sure they protect your personal data and keep to all privacy laws that apply. We may also independently audit these service providers to make sure that they meet our standards.

We will not share your personal data with anyone else for their own marketing purposes unless we have your permission to do this.

International data transfers

Data we collect may be transferred to, stored and processed in any country or territory where one or more of our Guardian group companies or service providers are based or have facilities. While other countries or territories may not have the same standards of data protection as those in your home country, we will continue to protect personal data that we transfer in line with this privacy policy.

Whenever we transfer your personal data out of the European Economic Area (EEA), we ensure similar protection and put in place at least one of these safeguards:

- We will only transfer your personal data to countries that have been found to provide an adequate level of protection for personal data.
- We may also use specific approved contracts with our service providers that are based in countries outside the EEA. These contracts give your personal data the same protection it has in the EEA.
- Where we use service providers in the United States, we may transfer personal data to them if they are part of the Privacy Shield scheme, which requires them to provide a similar level of protection of your personal data to what is required in the EEA.

If you are located in the EEA, you may contact us for a copy of the safeguards which we have put in place for the transfer of your personal data outside the EEA.

Keeping your personal data

We keep your personal data for only as long as we need it. How long we need your personal data depends on what we are using it for. For example, we may need to use it to answer your queries about your membership or surveys that you have participated in and as a result may keep information for the lifetime of your membership and for longer where necessary. When you cancel your membership, you will stop receiving communications from us about surveys. We will not delete the answers that you have provided to the Guardian Crowd through surveys and forum posts, but we will make your survey responses anonymous by removing all details that identify you. You can cancel your membership to the Guardian Crowd through the “My Profile” section of your member profile when you are logged in to the portal. You can also cancel your membership by using the unsubscribe link at the bottom of the survey invitation emails.

If we have asked for your permission to process your personal data and we have no other lawful ground to continue with that processing, and you withdraw your permission, we will delete your personal data. However, when you unsubscribe from marketing communications, we will keep your email address to ensure that we do not send you any marketing communications in future.

How we may contact you

We will use your email address to contact you when a new survey becomes available. You may also receive emails when another member replies to one of your posts on the forums.

Cookies and similar technology

When you visit our site, we may also collect information from you automatically, by using cookies or similar technologies (“cookies”). A cookie is a small file of letters and numbers that we may set on your device and that transfers information to your device. Other organisations may also set their own cookies on our site. Because of how cookies work, our website cannot access these cookies, nor can the other organisation access the data in cookies we use on our website.

We use the following types of cookies on this site:

- **Essential** - These cookies are essential for the operation of our site. This includes cookies that we use so that you can stay logged into your account. If you set your browser to block these cookies, some parts of our site will not work.
- **Performance** - These cookies are used to count how often you visit our site and understand how you use our site. We use this information to measure the performance of our site, which allows us to get a better sense of how our users engage with our service and to improve our site and apps so that users have a better experiences . For example, we collect information about which of our pages are most frequently visited, by which types of users. We use Google analytics on our site to report site usage. To opt out please click this [link](#).
- **Functionality** - These cookies are used to recognise you and remember your preferences or settings when you return to our site so that we can provide a more personalised experience for you.

How you can manage cookies and similar technology

You can manage how cookies are used. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

You can usually find these settings in the “options” or “preferences” menu of your browser. To understand these settings, the following links may be helpful, or you can use the “Help” option in your browser.

Cookie settings in [Internet Explorer](#)

Cookie settings in [Firefox](#)

Cookie settings in [Chrome](#)

Cookie settings in [Safari web and iOS](#)

You can switch some cookies off through the [Your Online Choices](#) site. You may need to do this again each time you use a different IP address or device.

Your rights with regard to your personal data

You can contact us with regard to the following rights in relation to your personal data:

- If you would like to have a copy of the personal data we hold on you or if you think that we hold incorrect personal data about you, please write to the Data Protection Officer at Guardian News & Media Limited, Kings Place, 90 York Way, London N1 9GU or email dataprotection@theguardian.com. We will deal with requests for copies of your personal data or for correction of your personal data within one month. If your request is complicated or if you

have made a large number of requests, it may take us longer. We will let you know if we need longer than one month to respond. You will not have to pay a fee to obtain a copy of your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

- Where you have provided us with consent to use your personal data, you can withdraw this at any time.
- Where applicable, you may also have a right to receive a machine-readable copy of your personal data.
- You also have the right to ask us to delete your personal data or restrict how it is used. There may be exceptions to the right to erasure for specific legal reasons which, if applicable, we will set out for you in response to your request. Where applicable, you have the right to object to processing of your personal data for certain purposes, including marketing purposes.

If you want to make any of these requests, please contact dataprotection@theguardian.com. We may need to request specific information from you to help us confirm your identity.

Your California privacy rights

Under California Civil Code Section 1798.83, if you live in California and your business relationship with us is mainly for personal, family or household purposes, you may ask us about the information we release to other organisations for their marketing purposes. To make such a request, please send an email to dataprotection@theguardian.com with “Request for California privacy information” in the subject line. You may make this type of request once every calendar year. We will email you a list of categories of personal information we reveal to other organisations for their marketing purposes in the last calendar year, along with their names and addresses. Not all personal information shared in this way is covered by Section 1798.83 of the California Civil Code.

Contact us for information about how we use your data

If you have any questions about how we use your data or if you have a concern about how your data is used, please contact the Data Protection Officer at Guardian News & Media Limited, Kings Place, 90 York Way, London N1 9GU or email dataprotection@theguardian.com.

Complaints will be dealt with by the Data Protection Manager, and will be responded to within 30 days.

If you are not satisfied with the way your concern has been handled, you can refer your complaint to the Information Commissioner’s Office.

Changes to the Privacy Policy

If we decide to change our privacy policy we will post the changes here. If the changes are significant, we may also choose to email all our registered users with the new details. If required by law, we will get your permission or give you the opportunity to opt-out of any new uses of their data.

