

# Social Media Policy

## for carrying out research of public interest

The purpose of this social media policy is to ensure transparency and legality in our processing of personal information for the individuals we analyze for carrying out research for public interest. Data is used in aggregated form for statistics and knowledge creation around a broad range of social media issues.

### 1. Contact information of Data controller

Analyse & Tal acts as the data controller for this processing activity. Our contact information is the following:

Analyse & Tal

Adresse: Thoravej 29, 2400 København

CVR: 36452595

Kontakt: Jens Gwen Stein, jens@ogtal.dk

### 2. To which purpose do we process your personal information?

We analyse publicly available content from social media platforms (see description in section 4) for research purposes aimed at advancing public knowledge in the following areas:

- Hate speech and minority rights
- Extremism and radicalization
- Spread of mis- and disinformation
- Public debate, freedom of speech and democratic engagement
- Online volunteering
- Public health issues

### 3. Legal basis of processing your data

The data processed in the project is primarily considered non-special category personal data. The data is collected and processed on the legal basis of the European General Data Protection Regulation (GDPR) article 6(1)(e), which permits for processing of general non-sensitive personal data with the goal of carrying out research of 'public interest'.

If we process special categories of personal data, we base the legality of our temporary processing hereof on the exception in GDPR, art. 9(2)(e). This specific legal basis of processing special category personal data is applicable to personal data, which are manifestly made public by the data subject itself and is exclusively used for processing personal data in these circumstances.

We understand 'public' as communities either 1) defining themselves as public, e.g. being a 'public group' or presenting themselves as a public space, or 2) having at least 2000 members<sup>1</sup>.

#### 4. What data do we process?

We process posts, comments, images, likes from *public* social media pages and groups (i.e. public social media content) which *may* contain personal data. This can be collected from a range of social media platforms, specifically but not exclusively:

- Facebook pages and groups
- Crowdtangle
- YouTube channels
- X (former twitter)
- Instagram
- Reddit
- TikTok
- Discord
- LinkedIn
- Flashback
- 4chan
- Threads
- Telegram

The personal data processed from the public social media content is primarily considered non-special category data. To minimize the data collection, we do not retain profile names or usernames but can in certain cases retain the first name of the profile e.g. to approximate demographic statistics.

When collecting public social media content (as defined above), we do in some instances collect certain types of special category data. This can occur if a social media user publicly has published social media content in which they have stated information about their racial/ethnic origin, political opinion, religious or philosophical

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<sup>1</sup> This specific limitation is based upon the official recommendation in the official guidelines for internet-based research developed by the national committee of research ethics in Norway 2019 available here: <https://www.forskningsetikk.no/retningslinjer/hum-sam/forskningsetisk-veileder-for-internettforskning/>.

beliefs, trade union membership, information about their own health or data concerning their own person's sex life or sexual orientation.

To mitigate the risk of special category data we qualitatively screen all communities before data collection to identify communities that legally might be considered public, but whom we evaluate exhibit a high risk of revealing sensitive information of the data subjects (e.g. patient groups). These communities are then either removed from the research project, and in cases where removal will have essential negative consequences on the research project, they will be manually anonymized.

Since full profile names and usernames are not collected, the risk of reidentifying the data subject is minimized. However, a small risk exists that a user might mention or tag another user's name within a community that can reveal sensitive information about a data subject (e.g. a user tagging his friend with his full name within a LGBTQ+ community that might reveal sexual orientation) If such data is encountered, we delete it immediately within our processing.

Moreover, we do not process personal data pertaining to children under the age of 15 years in accordance with the Danish Data Protection Act and GDPR without consent, as the age limit for creating a user, without parental consent on social media platforms, are 15 years old in accordance with the Danish Data Protection Act.

## **5. Data storage and deletion**

All data is stored in secured servers in data centers within the EU. Data is stored on encrypted hard drives and only transported through SSL-encrypted connections. All data collected is either fully anonymized, deleted upon completion of each project, or deleted 4 years after completion of the project. This depends on the nature of the project as well as the agreement made the client in question. To respect the rights of data controllers to maintain control of their personal data, we will remove from every dataset any personal data pertaining to an individual who requests such deletion.

## **6. Analysis and presentation of data**

We never publish any personal data collected during research. Personal data is also not shared with third parties external to Analyse & Tal without the explicit consent of the data subject. Any data published or shared with a third party is aggregated, anonymized, or altered to prevent identification of a natural person.

Where quotes from social media users are presented in our reporting, regardless of format, these quotes are bowdlerized/altered in a way which preserves meaning but prevents retroactive identification of the original post through e.g. an online search. This can consist in editing parts of the posts to make it impossible to identify, anonymizing text-bites or by removing the name of the page or group from where the post was collected.

An occasional exception to this policy is observed when the user is publicly known to the extent that they would not reasonably expect their social media posts to be private. It should be noted here that the GDPR only applies to natural persons, and not companies or organizations.

## **7. National provisions**

Since our organization is based in Denmark, where our headquarters are located, we follow the national provisions of Denmark and the guidelines put forward by the Danish Data Protection Authority (4 article, 16).

## **8. Your rights as a data subject**

Your rights in accordance with the EU's General Data Protection Regulation and the Danish Data Protection Act, you have several rights that you can invoke in connection with Analyse & Tal's processing of personal data. Beware that these rights can be limited due to this processing's nature of a research activity. The rights are as follows:

### **Right of access**

You have the right to access the information we process about you and the right to receive a copy of any information we hold about you, including information about who has disclosed the information if it did not come from yourself.

### **Right to erasure and right to rectification**

You have the right to have information about you erased or rectified. You have the right to have your information erased when it is no longer necessary. You can also contact us if you believe that we are processing your personal data unlawfully.

When you request to have your information erased or rectified, we assess whether the conditions are met. If the conditions are met, we rectify or erase your information as soon as possible, and if not, we will contact you with a reason why your information cannot be erased or rectified.

### **Right to restriction of processing**

You have the right to have the processing of your personal data restricted in certain circumstances. This applies if 1) the accuracy of your personal data is contested by you and we as the data controller are unable to verify the accuracy of this personal data, 2) the processing of your personal data is unlawful and you request the restriction of their use instead of erasure, 3) we do not longer need your personal data but they are required by you for the establishment, exercise or defense of legal claims and 4) you have objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.

### Right to object

You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. As the data controller, we shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of you or for the establishment, exercise or defense of legal claims.

### Right to complain to a Data Protection Agency

You have the right to complain to the Danish Data Protection Agency if you believe we are processing your information unlawfully, or if you believe we are not respecting your rights.

The contact information to the Danish Data Protection Agency is as follows:

Datatilsynet  
Carl Jacobsens Vej 35.  
2500 Valby  
Telefon: 33 19 32 00  
Mail: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)  
[www.datatilsynet.dk](http://www.datatilsynet.dk)