

# PRIVACY POLICY FOR OUR WORK ON MAPPING THE DANISH DIGITAL COMMUNITY CENTERS OF FACEBOOK

## **Legal basis of the projects**

The dataset used in the project is considered non-special category personal data. The data is thus collected and processed on the legal basis of the European General Data Protection Regulation European (GDPR) article 6 e. which permits for processing of non-special category personal data with the goal of carrying out research of ‘public interest’.

## **What data do we process?**

We process posts and content from public Facebook pages and groups. Public is here defined 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>.

## **What data do we NOT process?**

We do not collect special category personal data, i.e. data linked to data subjects racial/ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sexual orientation, or the data subject’s general health.

Profile names and usernames are anonymized (hashed and salted) upon collection. We also do not collect images and videos but only the URLs of the material.

## **Mitigating the risk of special category data.**

Since profile names and usernames is anonymized upon collection, reidentifying the data subject based solely upon the dataset is in general impossible. 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 community for homosexuals).

We delete such data immediately should we encounter it within our processing. Further, we qualitatively screen all communities before data collection in order to identify communities

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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/>

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 research project, they will be manually anonymized.

### **Data storage and deletion**

All data is stored in secured, on-premise servers in a locked and alarmed office. Data is stored on encrypted hard drives and only transported through SSL-encrypted connections.

All data collected is either fully anonymized or deleted upon completion of each project.

To respect the rights of data controllers to maintain control of their personal data, we will remove from all dataset any personal data pertaining to an individual who requests such deletion.

### **Analysis and presentation of data**

We never publish any personal data collected during research, nor is personal data 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, anonymised, 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 bowdlerised – 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 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 organisations.

### **National provisions**

Since our headquarter of our organization is based in Denmark, we follow the national provisions of Denmark and the guidelines put forward by the Danish Data Protection Authority (4 article, 16). Although, as the data is collected and processed on the legal basis of the European General Data Protection Regulation European (GDPR) article 6 e. which permits for processing of non-special category personal data with goal of carrying out research of ‘public interest’, this also applies to all Nordic countries.