

General Scope

This policy covers personally identifiable information collected or stored by the European Commission on its servers in relation to this project and its community. Consistent with its European legislation, the European Commission collects and retains the least amount of personally identifiable information needed to fulfill the projects' operational needs.

The public and collaborative nature of the project

This project is collaboratively developed by its users using the MediaWiki software. Anyone with Internet access (and not otherwise restricted from doing so) may edit the publicly editable pages of this site with logging in as a registered user. By doing this, editors create a published document, and a public record of every word added, subtracted, or changed. This is a public act, and editors are identified publicly as the author of such changes. All contributions made to this project, and all publicly available information about those contributions, are irrevocably licensed and may be freely copied, quoted, reused and adapted by third parties with few restrictions.

Activities on ThinkTank project

In general, this Policy only applies to private information stored or held by the European Commission which is not publicly available.

Interactions with the ThinkTank not covered by this Policy include, but are not limited to, aspects of browsing and editing pages, use of the wiki "email user" function, and corresponding with volunteers. These interactions may reveal a contributor's IP address, and possibly other personal information, indiscriminately to the general public, or to specific groups of volunteers acting independently of the European Commission.

Users may also interact with one another outside of the European Commission sites, via email, IRC or other chat, or independent websites, and should assess the risks involved, and their personal need for privacy, before using these methods of communication.

User accounts and authorship

The European Commission does require editors to register with the project. Anyone can edit with logging in with a username which is attributed to them. Except insofar as it may be required by law, no person should disclose, or knowingly expose, either user passwords and/or cookies generated to identify a user. Once created, user accounts will not be removed. It may be possible for a username to be changed, depending on the future development of the internal systems of the European Commission. The European Commission does not guarantee that a username will be changed on request.

Purpose of the collection of private information

The European Commission limits the collection of personally identifiable user data to purposes which serve the well-being of this project, including but not limited to the following:

To enhance the public accountability of this project. The European Commission recognizes

that any system that is open enough to allow the greatest possible participation of the general public will also be vulnerable to certain kinds of abuse and counterproductive behavior. The European Commission and the project community have established a number of mechanisms to prevent or remedy abusive activities. For example, when investigating abuse on a project, including the suspected use of malicious “sockpuppets” (duplicate accounts), vandalism, harassment of other users, or disruptive behavior, data registered by the European Commission may be used to identify the source(s) of the abusive behavior. This information may be shared by users with administrative authority who are charged by the community with protecting the project.

To provide site indicators. The European Commission analyses raw log data from users' visits. These logs are used to produce the site indicators; the raw log data is not made public.

To solve technical problems. Log data may be examined by developers in the course of solving technical problems and in tracking down badly-behaved web spiders that overwhelm the site.

Details of data retention

General expectations

IP and other technical information

When a visitor requests or reads a page, or sends email to a Wikimedia server, no more information is collected than is typically collected by web sites. The European Commission may keep raw logs of such transactions for limited time, but these will not be published or used to track legitimate users.

When a page is edited by a logged-in editor, the server confidentially stores related IP information for a limited period of time. This information is automatically deleted after a set period. Logging in with a registered username allows for better preservation of privacy.

Cookies

The sites may set a temporary session cookie on a visitor's computer whenever a project page is visited. Readers who do not intend to log in or edit may deny this cookie; it will be deleted at the end of the browser's session. More cookies may be set when one logs in to maintain logged-in status. If one saves a user name or password in one's browser, that information will be saved for up to 30 days, and this information will be resent to the server on every visit to the project. Contributors using a public machine who do not wish to show their username to future users of the machine should clear these cookies after use.

Page history

Edits or other contributions to the project on its articles, user pages and talk pages are generally retained forever. Removing text from the project does not permanently delete it. Normally, in project, anyone can look at a previous version of an article and see what was there. Even if an article is "deleted", a user entrusted with higher level of access may still see what was removed from public view. Information can be permanently deleted by individuals with access to the European Commission servers, but aside from the rare circumstance, there is no guarantee any permanent deletion will happen.

User contribution

User contributions are also aggregated and publicly available. User contributions are aggregated according to their registration and login status. Data on user contributions, such as the times at which users edited and the number of edits they have made, are publicly available via user contributions lists, and in aggregated forms published by other users.

Reading the project

No more information on users and other visitors reading pages is collected than is typically collected in server logs by web sites. Aside from the above raw log data collected for general purposes, page visits do not expose a visitor's identity publicly. Sampled raw log data may include the IP address of any user, but it is not reproduced publicly.

Editing projects

Edits to Project pages are identified with the username of the editor, and editing history is aggregated by author in a contribution list. Such information will be available permanently on the projects.

Logged in registered users:

Logged in users do not expose their IP address to the public except in cases of abuse, including vandalism of a wiki page by the user or by another user with the same IP address. A user's IP address is stored on the wiki servers for a period of time, during which it can be seen by server administrators and by users who have been granted CheckUser access.

IP address information, and its connection to any usernames that share it, may be released under certain circumstances (see below).

Using a username is a better way of preserving privacy. (Editors who would have not logged in would be likely to be easy to identify by their IP address; in which case it might be easy to cross-identify all contributions to various projects made by that IP. Depending on one's connection, this IP address might be traceable and it might be possible to use this information in combination with other information, including editing style and preferences, to identify an author completely.)

Discussions

On wiki discussion pages:

Any editable page can theoretically be the location of a discussion. In general, discussions on the project occur on user talk pages (associated with particular users), on article talk pages (associated with particular articles) or in pages specially designated to function as forums (e.g., the Village Pump). Privacy expectations apply to discussion pages in the same way as they do elsewhere.

Via email:

Users are required to list an email address when registering and then they can enable other logged-in users to send email to them through the wiki. When receiving an email from other users through this system, one's email address is not revealed to them. When choosing to send an email to other users, one's email is displayed as the sender.

The email address put into one's user preferences may be used by the European Commission for communication. Using e-mails also enable to reset user password if it is lost. A user can remove the account's email address from his preferences at any time to prevent it from being used. Private correspondence between users may be saved at those users' discretion and is not subject to European Commission privacy policy.

Access to and release of personally identifiable information

Access

The project is primarily run by volunteer contributors. Some dedicated users are set by the European Commission or chosen by the community to be given privileged access.

Sharing information with other privileged users is not considered "distribution."

Release

Policy on Release of Data

It is the policy of the European Commission that personally identifiable data collected in the server logs, or through records in the database via the CheckUser feature, or through other non-publicly-available methods, may be released by the European Commission, in any of the following situations:

1. In response to a valid subpoena or other compulsory request from law enforcement,
2. With permission of the affected user,
3. When necessary for investigation of abuse complaints,
4. Where the information pertains to page views generated by a spider or bot and its dissemination is necessary to illustrate or resolve technical issues,
5. Where the user has been vandalizing articles or persistently behaving in a disruptive way, data may be released to a service provider, carrier, or other third-party entity to assist in the formulation of a complaint to relevant Internet Service Providers,
6. Where it is reasonably necessary to protect the rights, property or safety of the European Commission, the project, its users or the public.

Except as described above, the European Commission policy does not permit distribution of personally identifiable information under any circumstances.

Third-party access and notifying registered users when receiving legal process:

As a general principle, the access to, and retention of, personally identifiable data in all projects should be minimal and should be used only internally to serve the well-being of the project. Occasionally, however, the European Commission may receive a subpoena or other compulsory request from a law-enforcement agency or a court or equivalent government body that requests the disclosure of information about a registered user, and may be compelled by law to comply with the request. In the event of such a legally compulsory request, the European Commission will attempt to

notify the affected user within three business days after the arrival of such subpoena by sending a notice by email to the email address (if any) that the affected user has listed in his or her user preferences.

The European Commission cannot advise a user receiving such a notification regarding the law or an appropriate response to a subpoena. The European Commission does note, however, that such users may have the legal right to resist or limit that information in court by filing a motion to quash the subpoena. Users who wish to oppose a subpoena or other compulsory request should seek legal advice concerning applicable rights and procedures that may be available.

If the European Commission receives a court-filed motion to quash or otherwise limit the subpoena as a result of action by a user or their lawyer, the European Commission will not disclose the requested information until the European Commission receives an order from the court to do so.

Registered users are required to provide an email address. However, when an affected registered user does delete an email address from his or her profile, the European Commission will not be able to notify the affected user in private email messages when it receives requests from law enforcement to disclose personally identifiable information about the user.

Privacy Policy Disclaimer

The European Commission believes that maintaining and preserving the privacy of user data is an important value. This Privacy Policy, together with other policies, resolutions, and actions by the European Commission, represents a committed effort to safeguard the security of the limited user information that is collected and retained on the European Commission servers. Nevertheless, the European Commission cannot guarantee that user information will remain private. We acknowledge that, in spite of the European Commission committed effort to protect private user information, **determined individuals may still develop data-mining and other methods to uncover such information and disclose it.** For this reason, the European Commission can make **no guarantee against unauthorized access** to information provided in the course of participating in project or related community.