# Privacy Notice

The PHAROS Association (“PHAROS”) is committed to preserving your privacy and being transparent about the Personal Data that we collect and how we use it under laws such as:

* [General Data Protection Regulation](https://gdpr.eu/) (GDPR);
* [UK Data Protection Act 2018](https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted);
* [California Online Privacy Protection Act of 2018](https://oag.ca.gov/privacy/ccpa/regs); and
* [California Consumer Privacy Act of 2018](https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=CIV&division=3.&title=1.81.5.&part=4.&chapter=&article).

The PHAROS Platform (“Platform”) brings together textual and visual Content produced by the staff of PHAROS Members, providers of web services, Third Party Rightsholders, and Users who grant PHAROS and PHAROS Members the rights to include the Content.

This Privacy Notice describes how PHAROS uses the data we collect through the Services that we provide to the Users of the PHAROS Platform (<https://artresearch.net/>). It does not apply to data collected through different channels.

Your privacy is important to us. We will never share or disclose the limited Personal Data that we collect about you to anyone other than you during the exercise of your rights, as explained below. For the avoidance of doubt, we do not sell Personal Data or share it with third parties. We will only share or disclose non-personal data, such as aggregated data or statistics related to platform usage to convey findings about User engagement with the PHAROS Platform.

It is important you understand that by accessing or using the Services, you agree to comply with all applicable laws and PHAROS policies, including the Open Access Policy and Terms of Use. For the protection of PHAROS, PHAROS Members, and other Users, if you do not agree with these policies you may not use the Services or PHAROS Platform.

## Why we collect data

We collect, store, and process Personal Data for the purposes of providing the PHAROS Services. We collect only the data we need to:

* give you a better experience, including your location, URL request, browser type and version, the type of device you are using, the date and time of the URL request, and which pages you visit;
* deliver our Services to you, including your username and email address, date and time of User Contributions; and
* meet our responsibilities to you, including your email address.

We engage in these activities because it is necessary for the purposes of providing, maintaining, and improving the Services pursuant to our Terms of Use and/or to comply with our legal obligations under the applicable laws.

## What data we collect

When you access or use the Services, PHAROS monitors and collects your location, URL request, browser type and version, the type of device you are using, operating system, the date and time of the URL request, which pages you visit, and any preferences you set while using the Platform. PHAROS uses this information to monitor service loads and improve the Services, as discussed further below.

When you create an account as a Registered User, PHAROS collects your username and e-mail address. When you are logged in to your account, PHAROS records any information you contribute, the date and time of the contribution, and your username.

Your username is always public and associated with your User profile and User Contributions. No other personal information is collected from your use of the Services unless you register for an account and otherwise post, send, or contribute information containing Personal Data, such as by including such information in your User profile or in a comment. For example, you might choose to disclose your name, credentials, professional affiliation, or social media profiles on your User profile. You are entirely in control of what Personal Data you share via your User Contributions. As a Registered User, you are able to post such data or remove it at any time. Please note that by choosing to post such data you are providing us with your consent to the collection and processing of this data.

PHAROS may also receive Personal Data indirectly during the aggregation of PHAROS Data provided by PHAROS Members. We display Digital Surrogates and Metadata provided by PHAROS Members via the PHAROS Platform which may contain Personal Data.

## How we collect your data

PHAROS uses website functionality cookies, indexing, and data archiving as part of our Services. We also collect data that you provide us through the creation of a User account and your engagement.

Cookies are text files that PHAROS sends to your browser for storage on your computer. They improve your experience by saving your status and preferences each time you use the Platform. For example, our cookies recognize you when you access the Platform and enable you to use your User account without having to resubmit login credentials. To facilitate this, we automatically collect certain information about how and when you use the Platform. We also use cookies for analytics, specifically Google Analytics. When accessing the Platform, you will be asked for consent to enable us to use cookies to improve your experience on the website and/or to help us improve our Services through analytics. You can manage and modify these cookies later by checking your browser’s settings.

Because of how browsers work, we also receive certain information automatically when you visit the Platform. This might include the type of device you are using, the type and version of your browser, the website that referred you to the Platform, which pages you visit, or the date and time of each request. PHAROS also indexes all terms entered into the search query. Indexing occurs automatically and records only the terms searched for using the PHAROS Platform. This means search terms are not indexed alongside usernames.

We use this information only to enhance your experience with the Platform, including the Services we provide to you, to provide greater security, test features and improve performance, and to understand how Users interact with the Platform. We use your contact information to enable certain account features (such as login verification) or to authenticate your account and keep it, and our Services, secure, and to help prevent spam, malicious content, or abuse.

When you make a contribution to the Platform, including on your User profile, you are creating a public record of every piece of content, added, removed, or altered by you. All data, metadata, comments, annotations and other information contributed to the Platform are collected and published as CC0 in a single data repository. The data repository is machine actionable using our SPARQL endpoint. Please ensure that you read the Terms of Use and Open Access Policy to understand how this affects any rights arising in your contributions to the Platform.

## How we use your data and content posted to the platform

PHAROS uses your data to maintain and improve how you and other Users experience our Platform. To help deliver the Services, PHAROS uses Google Analytics. This means we will share certain information we collect through the platform with:

* Google Analytics as is necessary to provide or improve the Services;
* PHAROS Members and our research partners as is necessary for their contributions to the Platform; and
* the public via the publication of Metadata and User Contributions, and via aggregated data or statistics related to platform usage, anonymized user information or other usage statistics to demonstrate findings about engagement with the PHAROS Platform.

PHAROS may be required to share information when responding to a legitimate request from law enforcement, or to prevent malicious use of the platform. In the event PHAROS is required by law to disclose any information related to your Registered User account, we will notify you by the email you used to register your account unless we are prohibited from doing so.

PHAROS will never publicly share your personal information unless you choose to make that information public. Nor will we share the Personal Data we collect or store through the Platform to any third parties for monetary or non-monetary compensation.

Certain parts of the Platform allow you to transcribe, annotate, post comments, save searches, save and share lists of items, or upload other content. All Content that you contribute may be posted, saved, and shared at your discretion. Please note such Content will be attributed to your username, viewable to others, publicly available, and may appear in search results on third party search engines. It is also published using the [CC0 1.0](https://creativecommons.org/publicdomain/zero/1.0/) Public Domain Dedication and is available for download through our SPARQL endpoint (<https://artresearch.net/sparql>).

## How we store and protect your data

PHAROS securely stores data on the Amazon Web Services cloud service based in the EEA (European Economic Area). The PHAROS server is currently located in the United Kingdom, where part of the data processing also occurs. PHAROS has taken a number of security precautions to protect any Personal Data collected through the Platform, including technical and organizational measures to address online security, risk of data breaches or loss, alteration of data or unauthorized access, and restricting access to Personal Data to authorized persons with a legitimate need to know for the purposes of processing, maintaining, and improving the Services.

Your Registered User account information remains secure and inaccessible to everyone except our PHAROS Platform managers. Your password is encrypted and cannot be accessed by anyone. We do not store a copy of your password. It is your responsibility to set and maintain its security.

You are in control of any personal information you post to the platform via your profile or User Contributions. If you do not wish this information to be public, do not include personal information in your profile or User Contributions. Many functions of the platform are intended to make information and Content publicly available, including for download through our SPARQL endpoint (<https://artresearch.net/sparql>). While you can modify or remove your User Contributions at any time, we cannot guarantee or warrant the information and data you submit to the Platform will be permanently erased. This is because datasets downloaded prior to such modification or removal will not be affected by any later edits or account deletions.

If you email us, we will keep the content of your message, your email address, and your contact information to respond to your request.

In the unlikely event that ownership of PHAROS changes, Personal Data, such as your email address and username, collected under this policy may be transferred to the new owner(s) of PHAROS in line with our legitimate interest, and/or become subject to a different privacy policy under the new owner. We will contact all Registered Users by the email provided during registration to gain consent at least thirty (30) days before any Personal Data is transferred or becomes subject to a different privacy policy. If consent is not obtained, we will terminate the User account and remove all data from the PHAROS Platform.

## How long we store your data

We do not store your Personal Data beyond the purpose for which it was collected (see “Why we collect data”). We store and retain Personal Data for the shortest period of time that is in line with maintaining, understanding, and improving the Services, and complying with our legal obligations.

Be aware that similar to other wiki-style platforms, PHAROS cannot ensure the full removal of any User contributions you make to the Platform. While the deletion of User contributions or User accounts will impact live data published to the data repository, it is possible your contributions may exist in older versions of the data downloaded through the SPARQL endpoint.

## Your rights

You have the right to:

* **access** your Personal Data and be **informed** how your data is processed and with whom it has been shared by requesting an overview of the Personal Data we process about you;
* **portability**, to receive the Personal Data you have provided to us in a structured, commonly used, and machine-readable format;
* **rectification,** if you believe your Personal Data has been processed inaccurately or incompletely, you may request that we **modify** or **supplement** the data; and
* request the **deletion** of your Personal Data or **withdraw consent** for its storage and processing at any time. A request for erasure will be processed without undue delay, within thirty (30) days at the latest.

You may submit a request to access, modify, or delete your Personal Data, or some else’s if you are their authorized agent, by contacting us as specified below (see “How to contact us”). We may require you to provide additional information for verification.

You can also make changes to your Personal Data, such as User Contributions and User profile information, at any time when logged in to your User account. User Contributions must be deleted individually. Modifying or deleting your data will immediately alter the public availability of your Content, but it may not permanently delete it from already downloaded versions of the data (see “How we store and protect your data” and “How long we store your data”). If you choose to delete your User account, deletion is instantaneous across our Platform and data infrastructures, and it cannot be reversed.

## How to contact us

To learn more about how we process your data, contact us [using this form](https://artresearch.net/resource/contact). Please allow us one month to respond to you. We will require proof of identification to facilitate your request.

If you have a complaint about the processing of your Personal Data, please contact us using the information above and also contact your local data protection authority.

## Changes to our privacy policy and notice

PHAROS may modify or update these policies in order to ensure their continued compliance with mandatory legal requirements or when the modification of our Services is required. Any modification will be highlighted on the Platform. The most current version of the Privacy Notice will always be available at (include link to Privacy Notice). Registered Users will be notified at least thirty (30) days in advance via the email used for registration purposes. By continuing to access or use the Services following the modifications or updates, Users agree to be bound by the revised Privacy Notice.

**Effective:** 8 July 2022