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## General Scope

This policy covers personally identifiable information collected or stored by the Executive Agency for Higher Education and Research Funding from Romania on its servers in relation to the Foreshit Wiki project (FORwiki) and its community. Consistent with its Data Retention Policy, the Agency collects and retains the least amount of personally identifiable information needed to fulfill the FORwiki's operational needs.

## The public and collaborative nature of FORwiki

FORwiki is collaboratively developed by its members using the MediaWiki software. Any community member (registered user) with Internet access (and not otherwise restricted from doing so) may edit the publicly editable pages of this site. 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 FORwiki, 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 FORwiki

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

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

Members may also interact with one another outside of Agency 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.

## **Member accounts and authorship**

Members or registered users are identified by their chosen username. Users select a password, which is confidential and used to verify the integrity of their account. 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 member. Once created, member accounts will not be removed.

## **Purpose of the collection of private information**

The Agency limits the collection of personally identifiable user data to purposes which serve the well-being of FORwiki, including but not limited to the following:

To enhance the public accountability of FORwiki. The Agency recognizes that any system that is open will also be vulnerable to certain kinds of abuse and counterproductive behavior. The Agency and FORwiki community have established a number of mechanisms to prevent or remedy abusive activities. For example, when investigating abuse on the project, including the suspected use of malicious ?sockpuppets? (duplicate accounts), vandalism, harassment of other users, or disruptive behavior, the IP addresses of users (derived either from those logs or from records in the database) 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 their community with protecting FORwiki.

To provide site statistics. The Agency statistically samples raw log data from users' visits. These logs are used to produce the site statistics pages; 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 Agency servers, no more information is collected than is typically collected by web sites. The Agency may keep raw logs of such transactions, but these will not be published or used to track legitimate users.

When a page is edited by a member (logged-in user), the server confidentially stores related IP information for a limited period of time. This information is automatically deleted after a set period.

### **Cookies**

The sites set a temporary session cookie on a visitor's computer whenever a FORwiki 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 FORwiki. 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 FORwiki on its articles, user pages and talk pages are generally retained forever. Removing text from FORwiki does not permanently delete it. Normally, in FORwiki, 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 (Administrator) may still see what was removed from public view. Information can be permanently deleted by individuals with access to Agency servers, but aside from the rare circumstance when the Agency is required to delete editing-history material in response to a court order or equivalent legal process, 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 FORwiki**

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 FORwiki**

Edits to FORwiki 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 FORwiki.

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).

## Discussions

On wiki discussion pages:

Any editable page can theoretically be the location of a discussion. In general, discussions on FORwiki 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 who provide a valid email address on registration can enable other logged-in users (members) 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 Agency for communication. Users whose accounts do not have a valid email address will not be able to reset their password if it is lost. In such a situation, however, users may be able to contact one of the Agency server administrators to enter a new e-mail address. Private correspondence between users may be saved at those users' discretion and is not subject to FORwiki policy.

## Release of personally identifiable information

It is the policy of Agency 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 staff, 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 targeting of IP blocks, or 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 Agency, its users or the public.

Except as described above, Agency 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 FORwiki should be minimal and should be used only internally to serve the well-being of FORwiki. Occasionally, however, the Agency 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 Agency 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 that the affected user has listed in his or her user preferences.

The Agency cannot advise a user receiving such a notification regarding the law or an appropriate response to a subpoena. The Agency 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 Agency receives a court-filed motion to quash or otherwise limit the subpoena as a result of action by a user or their lawyer, the Agency will not disclose the requested information until the Agency receives an order from the court to do so.

## **Disclaimer**

Executive Agency for Higher Education and Research Funding from Romania 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 Agency, represents a committed effort to safeguard the security of the limited user information that is collected and retained on our servers. Nevertheless, the Agency cannot guarantee that user information will remain private. We acknowledge that, in spite of our 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 Agency can make no guarantee against unauthorized access to information provided in the course of participating in FORwiki or related communities.