

Privacy Policy

The below is a privacy policy established for the Disinformation, Assessment, Listening and Investigation Lab: **DALIL**. DALIL is a tool developed to enhance the effectiveness of fact-checking in the MENA region through AI-driven solutions.

This policy was last updated on September 15, 2022.

This privacy policy ("**Privacy Policy**") constitutes a legally binding agreement made between you, ("**you**" or "**your**") and Siren Associates Ltd. ("**we,**" "**us**", or "**our**") regarding your access to and use of the DALIL desktop website (the DALIL "**Site**")

This Privacy Policy covers the processing of Personal Data pertaining to users of the DALIL Site in relation to the fact-checking services we provide (the "**Services**").

By agreeing to this Privacy Policy, you agree to the collection, use, processing, and disclosure of your Personal Data in accordance with the terms set out in this Privacy Policy.

DEFINITIONS

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

"**Account**" means a unique account created for you to access our Site or parts of each.

"**Cookies**" are small files that are placed on your Device (as defined below) by the DALIL Site, containing the details of your browsing history on that Site among its many uses.

"**Data Controller**" means the entity that, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

"**Device**" means any device that is used to access the DALIL Site.

"**Personal Data**" means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

"**Usage Data**" is usage related information such as the time spent by a User on the Site, the pages visited, the date and time of visits.

"**User**" means you, the individual accessing and/or using the DALIL Site, or the company, or other legal entity on behalf of which such individual is accessing and/or using the DALIL Site, as applicable. A User can be (a) A member of a fact-checking organization (hereinafter referred to as the **Fact-Checker**), (b) a person that can identify themselves as a journalist (hereinafter referred to as the **Journalist**), and/or (c)

any other individual using the DALIL Site (hereinafter referred to as the **Public User**).

SCOPE

This Privacy Policy has been established in compliance with the applicable United Kingdom legislation i.e., the United Kingdom General Data Protection Regulation (the UK-GDPR) and the Data Protection Act 2018 (as amended in 2021 to be read in conjunction with the new UK-GDPR) as well as data protection and privacy principles enshrined in applicable international best practices (such as Convention 108+ and the European General Data Protection Regulation).

This Privacy Policy does not cover data through which the identification of a natural person is not possible, and which can be made available to the public.

Please note that this Privacy Policy is only applicable to the use of direct services of the DALIL Site and does not extend to any other website, application or digital service that you may access through our Site (if any), each of which may have their own privacy policies that differ from this one. This Privacy Policy relates solely to the online information collection and use practices of the DALIL Site. We recognize that you may be concerned about the information you provide us with, and how we manage it. This Privacy Policy has been established to address those concerns.

By asking you to carefully read and agree to this Privacy Policy, we want to ensure that your use of the DALIL Site is safe and that any Personal Data you might share with us or that we might collect throughout your user journey, is processed in a transparent, lawful, fair and secure manner.

Please read this Privacy Policy carefully so that you can understand what our policy and procedures are regarding the processing of your Personal Data.

WHO IS YOUR DATA CONTROLLER?

When processing your personal information through your use of the DALIL Site, we act as data controller. This means that we, SIREN Associates Ltd., are responsible for the protection of your personal information. We have appointed a Data Protection Officer who can be contacted by users at the address specified below.

WHAT DATA IS COLLECTED?

When using the DALIL Site, Personal Data may be collected; this includes (but is not limited to) the below:

1. If you are a Fact-Checker: upon signing up to the Site, we will ask you to share with us and may use:
 - Your first and last name
 - Your date of birth
 - Your gender
 - Your contact details (particularly, your email address as provided by you or by another member of your organization who chooses to sign up)
 - Your chosen username
 - Your work affiliation
 - Your countries of interest
 - Your topics of interest
2. If you are a Journalist: upon signing up to the Site, we will collect and may use:
 - Your first and last name

- Your date of birth
- Your gender
- Your contact details (particularly, your email address)
- Your chosen username
- Your work affiliation
- Your countries of interest
- Your topics of interest

Whenever you access the Site whether a User or not, we will automatically collect and process the following Usage Data solely for analytical purposes as set out below:

- Device type and name
- Browser type and version
- Unique device identifiers and other diagnostic data
- Pages that are visited and time spent on the Site
- Date and time of visit
- Device operating system and version

WHEN DO WE PROCESS YOUR PERSONAL DATA?

We process the information listed above:

- When you visit and use the DALIL Site
- When you create an account to sign up to the DALIL Site
- When you register to one of the webinars/workshops advertised in the “Courses” section of the DALIL Site
- When you submit a claim by contacting us either directly through the platform or by reaching out by WhatsApp
- Whenever you access the DALIL Site but choose not to sign up, we will automatically collect and process the above-listed browsing information for the purpose of improving your and other users’ experience on the DALIL Site

WHY DO WE PROCESS YOUR PERSONAL DATA?

1. Your first and last name as well as your contact details (email) are collected:
 - To allow you to create an account on DALIL and authenticate you via email
 - If you are a Fact-Checker, we may collect your email address from other members of your organization if they share it with us so that we can invite you by email to create your own account on DALIL
 - To share updates that we think may be interesting to you based on the interests you shared with us (countries of interest, topics of interest)
 - To contact you if necessary
2. If you are a Fact-Checker or a Journalist, your first and last name will also be displayed to other fact-checkers and journalists in the “Discussion” feature of the DALIL Site to enable you to interact live and chat with them in view of verifying authenticity of an information
3. Your gender is collected to ensure gender mainstreaming objectives are met
4. If you are a Journalist or a Fact-Checker we may collect your work affiliation / occupation information to identify which organizations you are working for
5. Information on your interests and preferences are used to personalize your experience and use of the DALIL Site

6. Usage Data and other technical and analytics information are used to monitor the usage of the DALIL Site, to provide and maintain it and to help us improve your user experience and for statistical purposes
7. Your Personal Data might be also used for business transfers (as we may use it to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by us about the users of DALIL is among the assets transferred).

WHAT LEGAL BASES DO WE USE TO PROCESS YOUR PERSONAL DATA?

Any processing of your Personal Data is based on one or many of the following lawful bases:

Consent: We rely on your consent for your creation of an account and the processing of the requested information listed above that enables you to create this account. At any time, you are free to withdraw your consent by deleting your account, after which the personal data collected for the creation of your account will be deleted from our servers. Similarly, we rely on your consent when you register to a workshop or an e-learning course through the DALIL Site.

Legitimate interest: We also often base the processing of your Personal Data on our legitimate interest in enhancing the effectiveness of fact-checking operations around the MENA region, whenever such processing is necessary and proportionate to that interest. For example, Usage Data to improve the services provided by DALIL's Site and make sure these services are helping achieve the purpose of improving the work of fact-checking organizations in the MENA region.

Please note we will only use your data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose.

WHAT DO WE SHARE WITH THIRD PARTIES?

Some of the Personal Data that we collect might be shared with third parties as respectively mentioned below:

1. **Service providers:** providing internal technical support where needed as dedicated technical units from our service providers might require access to your Personal Data on a need-to-know basis to provide support where necessary and to subsequently assess any other problems which may be causing the reported issue(s). We may share your Personal Data with site providers to monitor and analyze the use of our Site and to contact you
2. **Partners:** We may share some of your Personal Data with our affiliates (i.e., any company that we control or that are under common control with us) and partners such as [ARIJ](#) and [JOSA](#), to honor and fulfill our services and activities and to offer you certain products, services or promotions, in this case we will require those affiliates and business partners to honor this Privacy Policy
3. **Other Fact-Checkers and Journalists:** To enable you as a Fact-Checker or a Journalist to properly interact with other Fact-Checkers in order to verify the authenticity of an information (particularly, through the "Discussion" feature of the DALIL Site), your first and last name will be disclosed to these Fact-Checkers and Journalists
4. **Law enforcement authorities:** Under certain circumstances, we may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government body)

5. **Other circumstances of disclosure:** We may disclose your Personal Data in the good faith belief that such action is necessary to: comply with a legal obligation, protect and defend our rights or property, prevent or investigate possible wrongdoing in connection with the DALIL Site, protect the personal safety of Users and other user of the DALIL Site or the public and protect against legal liability

WHAT RIGHTS DO YOU HAVE?

We undertake to respect the confidentiality of your Personal Data and to guarantee you can exercise your rights.

You also have the right under this Privacy Policy, to:

- **Request access to your Personal Data.** The rights to access, update or delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you. This also enables you to receive a copy of the Personal Data we hold about you.
- **Request correction of the Personal Data that we hold about you.** You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Object to processing of your Personal Data.** This right exists where we are relying on a legitimate interest as the legal basis for our processing and there is something about your particular situation, which makes you want to object to our processing of your Personal Data on this ground. You also have the right to object where we are processing your Personal Data for direct marketing purposes.
- **Request erasure of your Personal Data.** You have the right to ask us to delete or remove Personal Data when there is no good reason for us to continue processing it.
- **Withdraw your consent.** You have the right to withdraw your consent on using your Personal Data. If you withdraw your consent, we may not be able to provide you with access to your account and/or other specific functionalities of the DALIL Site.

RETENTION AND STORAGE OF DATA

Your Personal Data will be retained for as long as necessary to fulfill the purposes indicated in this Privacy Policy, enhance user experience and use of the Site, comply with legal obligations, resolve disputes, and enforce legal agreements and policies.

Usage Data for internal analysis purposes will generally be retained for up to 5 years, after which the data shall be anonymized and only used for statistical purposes, except when this data is used to strengthen the security or to improve the functionality of the DALIL Site, or when a legal obligation justifies retaining this data for a longer period.

SECURITY

To provide the highest level of security to the servers hosted by Amazon Web Services we have put in place procedures and technologies as per good industry practices and in accordance with applicable laws, to maintain security of all data from the point of collection to the point of destruction. However, such measures do not offer a complete guarantee of security.

WHO TO CONTACT FOR QUESTIONS RELATED TO YOUR PERSONAL DATA?

As mentioned above, for any inquiries about how your Personal Data is being processed or any other question related to your privacy and related rights, please contact our Data Protection Officer:

Data Protection Officer

Name: Gabriel Khoury

Address: Beirut Digital District, Building 1227, Bloc A

Email: gabriel@sirenassociates.com

CHANGES TO THIS PRIVACY POLICY

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. We will let you know via email and/or a prominent notice on our Site, prior to the change becoming effective and update the “Last updated” date at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

RIGHT TO RESORT TO COURT

Please note that, in accordance with UK-GDPR and the Data Protection Act 2018, you, or any of your heirs, may resort to the competent authorities, in particular the United Kingdom Information Commissioner's Office (the ICO) in order to ensure the exercise of your rights and to report the application of the provisions of the abovementioned law.