

Personally Identifiable Information (PII) - Publish Interactive

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DISCLAIMER

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Data Subject Types

The table below may apply to all Publish Interactive users, with Data subject types including:

- The Publisher's employees and administrators of the system
- The Publisher's Customers and end-users of the system

Personal Data Categories

Special Category data is neither required by the system, nor is it expected to be processed in any way.

Data Retention

Data actively used by Publish Interactive is held until removed by the Publisher.

Diagnostic logging data including server logs are designed to avoid collection of personal data and are retained indefinitely for the purposes of diagnosing software issues, securing against unauthorised access, tuning performance and helping us develop our services.

	Subject Matter	Input How	Storage	Reason for Processing	Sub Processors						Notes
					Hosting	Backup	Email	Logging	Analytics	Event Queue	
Name	The user's name	Registration form User's profile area via API/ Integration Manually entered by Publisher Admin	Database	Personalisation (e.g. emails / tab names) and for Publisher's records	✓	✓	✓	✓		✓	Compulsory on Publish Interactive registration forms but optional elsewhere Used in system emails sent via email handler Optional field in emails configurable by Publisher
Email	The user's email address	Registration form User's profile area via API/ Integration Manually entered by Publisher Admin	Database	System emails (e.g. 'welcome to the site', password reset, search alerts) Publisher records Can also be used for authentication in addition to 'username'	✓	✓	✓	✓	✓	✓	Compulsory on Registration form but optional elsewhere
Phone	The user's (work) phone number	Registration form User's profile area via API/ Integration Manually entered by Publisher Admin	Database	Publisher's records/use	✓	✓	✓	✓		✓	Not needed or used by Publish Interactive Optional field in emails configurable by Publisher
Job Title	The user's job title	Registration form User's profile area via API/ Integration Manually entered by Publisher Admin	Database	Publisher's records/use	✓	✓	✓	✓		✓	Not needed or used by Publish Interactive Optional field in emails configurable by Publisher

	Subject Matter	Input How	Storage	Reason for Processing	Hosting	Backup	Email	Logging	Analytics	Event Queue	Notes
Department	The department the user works in	Registration form User's profile area via API/ Integration Manually entered by Publisher Admin	Database	Publisher's records/use	✓	✓	✓	✓		✓	Not needed or used by Publish Interactive Optional field in emails configurable by Publisher
Country	The country where the user is based	Registration form User's profile area via API/ Integration Manually entered by Publisher Admin	Database	Publisher's records/use	✓	✓	✓	✓	✓	✓	Not needed or used by Publish Interactive. Can be worked out from users IP address or network location.
Username	The user's unique username (used to log into the system)	Registration form User's profile area via API/ Integration Manually entered by Publisher Admin	Database	Uniquely identifies the user	✓	✓	✓	✓	✓	✓	Compulsory and not changeable Sometimes is the users email address (self registration) Optional field in emails configurable by Publisher
Password	The password used to access the system		Database	Authenticating the user	✓	✓		✓			Stored as a one-way hash (cannot be read by anyone once entered into the system)
Password recovery response	Used when the user has forgotten their login credentials	When logging into the system for the first time or updated via the user's profile area	Database	Allow the user to self-serve account recovery	✓	✓		✓			Stored as a one-way hash (cannot be read by anyone once entered into the system)
Company name	The name of the company the user works for	Registration form via API/ Integration Manually entered by Publisher Admin	Database	Primarily for the publisher's records/use but may also be used to personalise system emails	✓	✓	✓	✓	✓	✓	
Profile photo / image	An image, typically of the user, used to personalise the site	User profile area - by user or by publisher admin	File storage	Used to personalise the user's experience, such as being shown next to comments or notes as part of a discussion.	✓	✓					Optional
Saved search definitions	Searches performed by the user that the user has saved either as a shortcut for later use or to generate alert emails	Via API/integration On the search page by user or publisher admin	Database	Enables the user to tailor search alerts and shortcuts	✓	✓	✓	✓		✓	

	Subject Matter	Input How	Storage	Reason for Processing	Hosting	Backup	Email	Logging	Analytics	Event Queue	Notes
Language	The user's preferred language for the user interface	Registration form, user's profile area, via API/integration, Manually entered by publisher admin	Database	Allows the user to experience the site's user interface in their preferred language	✓	✓		✓		✓	
Comments / notes	Text entered by the user alongside published content	By user / via web interface	Database	used either for their own reference or as part of a discussion with the publisher or colleagues	✓	✓		✓			Optional. Visible to publisher administrators and (optionally) other members of the user's account
IP address	The user's IP address used when logging into the system	Automatic on login or site access	Database	Admin area MFA and publisher audit purposes. Added to all exports.	✓	✓	✓	✓	✓	✓	Can also be used to skip two factor authentication (trusted IP). Used for audit and security purposes. Known, at least in part, by analytics services.
Browser information	Information retrieved from the user's browser such as it's name (Chrome), version and the underlying Operating System	Automatic on login or site access	Database	Used by Publish Interactive to inform development decisions	✓	✓		✓	✓	✓	
Usage logs & statistics	A record of the user's interactions with the website e.g. at a certain date/time, the user access report X and performed action Y	Automatically created as the site is browsed.	Database	Used by the Publisher to review and understand usage. Used also with 3rd party tools to help us develop our software and service.	✓	✓		✓	✓	✓	Collected and stored also by third party analytics services.
Email content	Emails are sent out by the system e.g. registration, password reset and alerts.	Email templates are managed by the publisher admin (in the web interface). Emails are automatically generated using these templates.	Database	The system keeps a record of these emails for the publisher's auditing purposes and for investigating delivery issues.	✓	✓	✓	✓			Email is routed through an email handler who will have access to the emails' content

	Subject Matter	Input How	Storage	Reason for Processing	Hosting	Backup	Email	Logging	Analytics	Event Queue	Notes
Personalised Experience	Allows the publisher to create a tailored experience for their customers. E.g. Target specific customers with adverts / branding.	By Publisher Admin	Database	To provide a personalised user experience	✓	✓		✓		✓	Optional
Personalised export templates	Allows the publisher to create a tailored experience for their customers by building specific export templates for	Uploaded by the publisher	File storage on disk	To provide a personalised user experience	✓	✓					Optional

Sub Processor Function	Entity Name	Purpose and Notes	More Information
Hosting & file storage	Rackspace	Some of services are hosted with Rackspace, specifically in Rackspace's Chicago data centre (ORD) - this includes cloud file storage.	https://www.rackspace.com/en-gb/information/legal/privacystatement/privacy-shield
Hosting & file storage	Amazon AWS	The majority of our service and infrastructure are with AWS which includes, but is not limited to, file storage, application logging, web server and database hosting. We also leverage AWS's Content Delivery Network (CDN) 'CloudFront'.	https://aws.amazon.com/compliance/eu-us-privacy-shield-faq/
Hosting & file storage	Microsoft Azure	Our service utilises a number of Azure services, including Azure file storage and monitoring.	https://privacy.microsoft.com/en-us/Privacy
Backup	Microsoft Azure and Amazon AWS	AWS and Microsoft are our current off-site backup providers - the backup data is stored encrypted.	https://aws.amazon.com/compliance/eu-us-privacy-shield-faq/
Event Queue	CloudAMQP	CloudAMQP manage our event queues which are located in AWS and used by our Publishers to integrate with other systems.	https://www.cloudamqp.com/security_policy.html
Email	Sendgrid	Email sent by Publish Interactive is routed through Sendgrid's systems.	https://sendgrid.com/policies/privacy/
Analytics	Google Analytics & Microsoft Application Insights	Our service includes many bespoke tracking and analytics features, however we supplement these with a basic configuration of Google Analytics to help inform our product development process.	https://privacy.google.com/businesses/compliance https://docs.microsoft.com/en-us/azure/azure-monitor/platform/data-security
Content Translation	AWS	Published content may be translated into a number of languages via an automated service. PII is not involved in this process, however indirect usage of the service could be traced back to an individual.	https://aws.amazon.com/translate/
Logging	AWS & Microsoft Azure	Many of the logs generated by the Publish Interactive service are sent to AWS and Microsoft, primarily for the purposes of debugging and helping us improve our service to our customers.	https://aws.amazon.com/compliance/eu-us-privacy-shield-faq/