



OVERSIGHT BOARD – WEBSITE PRIVACY NOTICE

Last revised: 1 January 2024

This Privacy Notice (“**Notice**”) describes how Oversight Board LLC and Oversight Board UK and our affiliates (referred to in this Notice collectively as “the **Oversight Board**”, “**we**”, “**us**”, and “**our**”) collect, use, disclose, and otherwise process personal information about you, as well as the related rights and choices you have with respect to your personal information, when you interact directly with Oversight Board, for example when you browse our website, or submit comments about our cases or policy advisory opinions.

EEA/UK Individuals: see [Section 14 Additional information for EEA/UK individuals](#) for additional information about your privacy rights.

California residents: see [Section 15 Additional information for California residents](#) for additional information and your rights under the California Consumer Privacy Act.

1. Scope

Except as otherwise noted below, this Notice applies to the personal information that we process related to your direct interactions with the Oversight Board. This Notice **does not apply** to personal information that:

- **We receive from Meta Platforms, Inc. (“Meta”), or that is submitted to www.oversightboardappeals.com or relates to an appeal in relation to a content decision on Facebook or Instagram. The Oversight Board provides content review services to Meta and any personal information we process in connection with those services is done by us as a data processor/service provider solely on behalf of Meta and in accordance with [Meta’s Data Policy for the Oversight Board’s Data Processing Activities](#). (See [Section 5](#) for further information)**
- We collect about applicants for positions with the Oversight Board, in relation to which please see [the Oversight Board - Applicant Privacy Notice](#).
- We collect about applicants for a position as a Board Member, in relation to which please see [the Oversight Board – Board Member Candidate Privacy Notice](#)
- We collect about the Oversight Board employees and contractors.

2. Personal Information We Collect About You

The information in this Notice is intended to provide an overall description of our collection, use, and disclosure of personal information about you, as required by applicable privacy laws. Our actual collection, use, and disclosure of personal information about you and the types of information that the Oversight Board collects may vary depending upon the circumstances and on how you interact with us.

Information and content you provide to us directly. We collect information in relation to:

- Our public engagement platform: If you submit comments about our cases or policy advisory opinions, or otherwise publicly engage with us, we will collect your name and other identification details, your contact information, and any personal information you voluntarily provide as part of your comment. We encourage you not to share with us any sensitive special category personal data (i.e., data revealing race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs etc.).
- Communications with us: We also collect communications and other information you provide to us when you interact with us or disclose it publicly (such as in a social media post or comment), including where you communicate with us via email, telephone or social media, comment on the cases we are considering or when you meet our staff. Such information can include your name and other identification details, your contact details, the organisation(s) with which you are affiliated, your areas of interest and/or expertise, and information embedded in or about the content you provide (e.g., metadata).
- Events and other information: We also collect personal information related to your participation in our events as well as other requests that you submit to us directly. For example:
 - if you register for or attend an event that we host or sponsor, we may collect information related to your registration for and participation in such event.
 - When you fill out a 'Contact Us' form, sign-up to attend stakeholder briefings or to receive email updates on cases being considered by the Oversight Board or other mailing lists by us, or otherwise request information from us, we collect and maintain records of your requests.
 - When you complete a survey, we collect personal information about you, including your responses.
- Our suppliers, vendors, and experts: If you are one of our chosen suppliers, vendors, or experts we will collect basic personal information from you in order to work effectively with you and allow you to provide your services to us. Such information includes your name, business contact details,

your title and role. To the extent relevant we will also collect billing related information, which may include collection of your name, billing address, payment information, and other transaction details.

Personal Information Collected Automatically. When you interact with us, we collect personal information about how you use our websites and your interactions with us and others, including information we collect automatically (e.g., using cookies and pixel tags), as well as information we derive about you and your use of the website. Such information includes:

- **Device and browser information:** we use cookies, log files, pixel tags and other technologies to automatically collect information when users access or use our websites, such as IP address, general location information, domain name, browser type, device type, device ID, internet service provider, referring and exiting URLs, operating system, language, clickstream data, and similar device and usage information. We may also collect or derive general location information about you, such as through your IP address.
- **Usage data:** we also collect activity information related to your use of our websites, such as information regarding what pages you accessed and when, date and time of your visit, the links clicked, searches, features used, items viewed, and time spent within the websites. We may also use pixels in HTML emails to understand if individuals read or open the emails we send to them.

Please see our [Cookie Policy](#) for more information.

Information others provide about you. We also receive and analyse content, communications and information that other people provide when they interact with us or make it publicly available. This may include personal information such as your name, your contact details, your location, the organisation(s) with which you are affiliated, your areas of expertise. This information would typically come from the following sources:

- Social networks;
- Internet service providers;
- Data analytics providers;
- Operating systems and platforms.

We may also obtain these details through publicly available sources (e.g., the website of the organisation with which you are affiliated) and/or personal connections of our staff members and Board Members. For example, if you are related to a member of our staff, they may give us information about you for example, when a member of our staff tells us about any conflicts of interest they may have as a result of a connection with you.

3. Our purposes for processing your personal information and the legal bases we rely upon

The table below sets out our key purposes for processing your personal information and the legal bases we rely upon to the extent required under certain applicable data protection laws, such as the GDPR.

Purposes for Processing	Legal basis (we rely on where required by applicable law, e.g., under the GDPR)
To consider comments you have made regarding our cases or policy advisory opinions.	It is necessary for our legitimate interests that we take account of the views of the public to inform our work to consider cases and policy advisory opinions.
To plan and manage events, including registration, attendance, connecting you with other event attendees, and contacting you about relevant events (e.g., our public stakeholder meetings).	Consent and / or necessary for our legitimate interests to facilitate attendance at one of our events or briefings.
To send you updates from the Oversight Board on cases and public comment opportunities and other news or electronic newsletters.	Consent.
To manage our relationship with you if you are one of our third party suppliers or vendors.	Necessary for the performance of contract and / or necessary for our legitimate interests to ensure we maintain our relationship with you.
To understand how our users navigate our website and help improve user experiences on our website and services.	Consent and / or necessary for our legitimate interests to improve user experiences on our website. See our Cookie Policy for further information.

4. How we disclose personal information

The Oversight Board works with third-party service providers and other third parties, who help us to provide and improve our services (such as IT service providers and professional advisers). Below are the types of third parties to whom we may disclose your personal information for the purposes described in this Notice:

- ***Vendors and service providers.*** We disclose personal information to third parties who perform services on our behalf, such as IT service providers; payment processors; or third party analytics organisations. Where these third parties process personal information, we take steps to ensure that they can implement adequate security measures to protect your personal information and maintain confidentiality of the personal information they process for us. They only process your personal information to provide us with requested services and only act on our documented instructions.
- ***Board Members.*** The Oversight Board comprises of Board Members who bring their diverse cultural and professional backgrounds to provide content review and related services. We may disclose comments that you make about cases and policy advisory opinions with Board Members where relevant to the work they are doing.
- ***Professional advisers and other external parties.*** We may need to share your personal information with professional advisers and other external parties in order to obtain advice regarding any relevant legal claims and as needed to manage the operations of the Oversight Board.
- ***Legal, supervisory, and regulatory authorities.*** We may share personal information with legal, supervisory and regulatory authorities and any government agencies and law enforcement bodies, or in response to a valid subpoena or legal process served by a third party, to comply with our legal obligations; protect the rights and property of the Oversight Board and other stakeholders; and to detect and respond to suspected illegal activity and threats to the safety of any person, systems or services.
- ***In connection with any restructuring.*** We may need to share your information with third parties in order to implement any restructuring of the Oversight Board such as a merger, sale or other transfer of part or all of the assets of these organisations.
- ***Security and protection of rights.*** We may disclose personal information where we believe necessary to protect our website, services, our agreements and business operations and our rights, such as to prevent and detect fraud, unauthorized activities and access, and other misuse.
- ***Other third parties.*** We may otherwise disclose personal information to other third parties, with your consent or at your direction.

5. How the Oversight Board works with Meta

The Oversight Board provides content review services to Meta, on Meta's behalf and as a data processor and service provider. As such, the Oversight Board is involved in receiving, reviewing, and handling appeals of Meta decisions about content on Facebook or Instagram. In the course of those activities, the Oversight Board has access to and processes certain personal information provided or

made accessible by Meta, or that an individual provides through www.oversightboardappeals.com as part of an appeal or case. When we collect such information on behalf of Meta, the relevant Meta privacy terms will apply to and govern the processing of such personal information, not this Notice. In such case, the Oversight Board will only collect, use, retain, disclose, and otherwise process such information on behalf of Meta and in accordance with our applicable contractual agreements with Meta. For information on how personal information may be processed in this context, please review [Meta's Data Policy for the Oversight Board's Data Processing Activities](#).

6. Your privacy rights and choices

You may opt out of our direct marketing emails by clicking the unsubscribing link contained in our marketing or promotional emails or by contacting us as set out in [Section 12 Contact us](#). We may continue to send you transactional or service-related communications, such as administrative messages, in accordance with applicable privacy laws. You may also, subject to applicable law, submit a request to us to access, correct or delete personal information by contacting us at the details set forth in [Section 12 Contact us](#). We will process your request in accordance with applicable privacy and data protection laws. We may ask you for additional information so that we can confirm your identity or process your request.

Additional Information for Certain Jurisdictions. [Section 14. Additional information for EEA/UK individuals](#) and [Section 15. Additional information for US/California residents](#) each provide additional information, as required by certain privacy laws, about the rights of individuals under the privacy laws of certain jurisdictions (including California, the EEA, and the UK).

7. Data retention and deletion

We have a data retention policy to ensure that data is stored for no longer than is necessary to fulfil the purposes for which it was collected and, after such time, it is securely deleted. This is a case-by-case determination that depends on things such as the nature of the data, why it was collected and processed and relevant legal or operational retention requirements the Oversight Board need to comply with.

Aggregate and Non-Identifiable Information. In some circumstances, the Oversight Board may anonymise your information or aggregate it with other information so that it can no longer be associated with you, in which case the Oversight Board may, subject to applicable data protection and privacy laws, use the data without further notice to you. Where we use, disclose, or otherwise

process de-identified information, we will maintain and use this information in de-identified form and not attempt to reidentify the information, except in accordance with applicable privacy laws.

8. International transfers of personal information

The Oversight Board has entities and operations in the United States and the United Kingdom. As such, we may transfer your personal information to, and process your personal information in other jurisdictions where we and our service providers have operations. Some of these jurisdictions may not provide equivalent levels of data protection as compared to your home jurisdiction. We will take steps to ensure that your personal information receives an adequate level of protection in the jurisdictions in which we process it. Where we transfer information to jurisdictions which are not considered by the European Commission or the UK Government to have an adequate level of protection for personal information, we have or will put in place appropriate measures, including by putting in place contractual protections, such as the standard contractual clauses as approved by the European Commission (the form for the standard contractual clauses can be found at https://eurlex.europa.eu/eli/dec_impl/2021/914/oj). Transfers between relevant Oversight Board entities are covered by an agreement entered into by those entities which contractually obliges each relevant entity to ensure your personal information receives an adequate and consistent level of protection wherever it is transferred between Oversight Board entities. For more information regarding the transfer mechanism we rely on, you may contact us using the details set forth in [Section 12 Contact us](#).

9. Automated decision-making

We do not envisage that any decisions will be taken about you by the Oversight Board using automated means but will notify you by posting an updated version of this Notice if this position changes.

10. Children

Our website is not designed for or directed at individuals under the age of 18 and we do not knowingly collect personal information from individuals in this age group. If you believe we have inadvertently collected personal information about a child, please contact us and we will take steps to delete this data.

11. Changes to this Notice

This Notice is current as of the 'Last Revised' date set forth above. The Oversight Board reserves the right to update this Notice at any time, so please be sure to check back periodically. If we make any changes to this Notice that materially affect our practices with regard to the personal information we have previously

collected from you, to the extent required by applicable law, we will provide you with notice of such change in advance by highlighting the change on our website. The Oversight Board may also notify you in other ways from time to time about the processing of your personal information.

12. Contact us

If you have any questions about this privacy Notice, please contact us at dataprotection@osbadmin.com.

13. Additional information for EEA/UK users

Below we provide additional information for individuals located in the European Economic Area and United Kingdom.

Controller and Responsible Entity: For purposes of this Notice, the controller(s) determining the purposes and the means for the processing of your personal information are Oversight Board UK (ICO registration number ZA804287) or Oversight Board LLC.

European representative: To comply with the General Data Protection Regulation (2016/679) we have appointed a European representative. You may contact them via:

- mail at: Bird & Bird GDPR Representative Services Ireland, Deloitte House, 29 Earlsfort Terrace, Dublin 2, D02 AY28, or
- e-mail at: EUrepresentative.OversightBoard@twobirds.com.

Additional Privacy Rights. Residents of the European Economic Area (EEA) or United Kingdom (UK) have certain legal rights in relation to your personal information, as set out below. We may not always be able to do what you have asked because your rights will not always apply (e.g. if the law allows us to deal with the request in a different way).

We may ask for proof of identity when you make a request to exercise any of these rights to ensure we only disclose information to the right individual.

- **Request access** to your personal information (commonly known as a data subject access request). This enables you to request a copy of the personal information that the Oversight Board holds about you and to check that it is lawfully processed;
- **Request correction** of your personal information if it is inaccurate or incomplete;
- **Request erasure** of your personal information. This enables you to ask the Oversight Board to delete or remove personal information where there is no good reason for the Oversight Board to continue to process it;

- **Object to processing** of your personal information where the Oversight Board is relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. If we do have compelling legitimate grounds to continue to use your personal information then we may continue to do so, in line with applicable data protection laws. You can also object if you no longer wish to receive direct marketing from us;
- **Request the restriction of processing** of your personal information. This enables you to ask the Oversight Board to suspend the processing of personal information about you, for example if you want to establish its accuracy or the reason for processing it;
- **Request the transfer** of your personal information that you have provided to us in some cases, in a structured, commonly used and machine-readable format and have the right to transmit it to other data controllers without hindrance;
- **Right to lodge a complaint** with regard to your personal information. You also have the right to lodge a complaint with a supervisory authority. We would hope that you contact the Oversight Board in the first instance where we will endeavour to resolve your query or complaint; and
- **Right to withdraw consent** where our processing is based on your consent. You are free to refuse to give consent and you can withdraw your consent at any time. The lawfulness of any processing of your personal information that occurred prior to the withdrawal of your consent will not be affected.

To exercise your rights under the GDPR, please submit your request to the Oversight Board's Data Protection Officer at dataprotection@osbadmin.com.

14. Additional information for California residents

Below, we provide additional information required under California privacy laws, including the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, "**CCPA**").

Categories of Personal Information We Collect and Disclose

Our collection, use, and disclosure of personal information about you will vary depending upon the circumstances and nature of our interactions or relationship with you. The table below sets out generally the categories of personal information (as defined by the CCPA) about California residents that we collect (and have in the prior 12 months collected), as well as the categories of third parties to whom we may disclose this information.

Categories of Personal Information Collected		Categories of Third-Party Disclosures
Identifiers	Includes direct identifiers, such as name, contact information, IP address or other unique online identifiers.	<ul style="list-style-type: none"> • Advisors and agents • Regulators, government entities and law enforcement • Affiliates and subsidiaries • Data analytics providers • Internet service providers, operating systems and platforms • Meta
Protected classification characteristics under California or federal law	If you choose to provide it, we may collect some information that is considered a protected classification under California/federal law, such as race, gender, marital status, medical condition, age, disability status, pregnancy status, gender identity, and sexual orientation.	<ul style="list-style-type: none"> • Advisors and agents • Regulators, government entities and law enforcement • Affiliates and subsidiaries • Meta
Internet and electronic network activity information	<u>Device and browser information:</u> cookies, log files, pixel tags and other technologies to automatically collect information when users access or use our websites, such as IP address, general location information, domain name, browser type, device type, device ID, internet service provider, referring and exiting URLs, operating system, language, clickstream data, and similar device and usage information	<ul style="list-style-type: none"> • Advisors and agents • Regulators, government entities and law enforcement • Affiliates and subsidiaries • Data analytics providers • Internet service providers, operating systems and platforms
Geolocation data	General location information through an IP address on your device.	<ul style="list-style-type: none"> • Advisors and agents • Regulators, government entities and law enforcement • Affiliates and subsidiaries • Advertising networks • Data analytics providers • Internet service providers, operating systems and platforms
Professional and employment-related information	Includes professional and employment-related information such as current and former employer(s) and position(s), business contact information and professional memberships).	<ul style="list-style-type: none"> • Advisors and agents • Regulators, government entities and law enforcement • Affiliates and subsidiaries

Sales and sharing of personal information. We do not sell or share (as defined by the CCPA) (i) any personal information, (ii) sensitive personal information, or (iii) any personal information about individuals who we know are under sixteen (16) years old.

Sources of personal information. In general, and as explained further above in Section 2 of this Notice, we obtain the categories of personal information directly from you, automatically and from third parties.

Purposes for the Collection, Use, Disclosure and Processing. As described in more detail in Section 3 and Section 4, we may collect, use, disclose and otherwise process personal information for one or more of the purposes described therein and as otherwise directed or consented to by you.

Sensitive personal information. As mentioned above, we do not typically use or disclose sensitive personal information. To the extent that we do use or disclose sensitive personal information and will do so as authorized pursuant to Section 7027 of the CCPA regulations (Cal. Code. Regs., tit. 11, § 7027 (2022)).

Retention. We retain the personal information we collect in accordance with our data retention policy and only as reasonably necessary for the purposes described above or otherwise disclosed to you at the time of collection. For example, we will retain information as necessary to comply with our tax, accounting and recordkeeping obligations, for research, development and safety purposes, as well as an additional period of time as necessary to protect, defend or establish our rights, defend against potential claims, comply with legal obligations and as may otherwise be required by law.

CCPA Privacy Rights. California residents have certain rights under the CCPA with respect to their personal information, subject to certain limitations and exceptions, including:

- **Know/access:** the right to know what personal information we have collected about them, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about them;
- **Correct:** the right to request that a business that maintains inaccurate personal information about the resident correct that personal information;
- **Delete:** subject to certain exceptions, the right to request deletion of their personal information that we have collected about them;

- **Limit use or disclosure of sensitive personal information:** the right to limit the use or disclosure of sensitive personal information to those uses authorized by California privacy laws (however, as noted above, we do not use or disclose sensitive personal information other than as authorized by the CCPA regulations);
- **To Opt out of sales and sharing:** the right to opt out of our sale and sharing of their personal information (however, as noted above, we do not sell or share your personal information); and
- **Non-discrimination:** the right to not be subject to discriminatory treatment for exercising their rights under the CCPA.

Submitting CCPA Requests. California residents may submit a request to exercise their CCPA rights online via email at dataprotection@osbadmin.com. Only you, or someone legally authorized to act on your behalf (including parents and guardians of minors), may make a consumer request related to your personal information. We will process your request with respect to the personal information in our records that is linked or reasonable linkable to the personal information provided as part of your request.

We may ask for proof of identity when you and / or your authorized representative makes a request to access, correct and / or delete their personal information to ensure we only disclose information to the right individual.

We will verify your request and may ask you or your authorized representative for proof of identity, authorization, and/or additional information when you and / or your authorized representative makes a request to access, correct and / or delete their personal information to ensure we confirm the request and only disclose information to the right individual. If we cannot verify your identity or authority to make the request and confirm the personal information relates to you, the Oversight Board will deny the consumer request in whole or in part and will not to disclose the information requested or, as applicable, will not delete the information requested. The Oversight Board will respond to any such consumer request with a denial and will also explain why it has no reasonable method by which it can verify the identity of the requestor.