

Prolific Privacy Notice and Cookies Policy

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors, service users and other individuals with whom we deal. This Notice sets out information about how we use, store and transfer personal data relating to those individuals. We are a data controller in relation to that personal data, which means we determine the purposes and means of the processing of that personal data.
- 1.2 This Notice also contains our cookies policy. We will ask you to consent to our use of cookies in accordance with the terms of this Notice when you first visit our website.

2. How we use your personal data

- 2.1 In this Section we have set out:
 - a) the kinds of personal data that we may collect, use, store and transfer. We have grouped that data together into different categories based on its subject matter, and based on the kinds of individuals to whom it may relate;
 - b) the purposes for which we may process personal data;
 - c) the legal bases of the processing. The **legal basis** means one of the permitted bases for processing set out in Article 6 of the General Data Protection Regulation (GDPR). We are required by law to identify this legal basis to you.

Data relating to almost everyone we deal with, such as Prolific users, suppliers, commercial partners and correspondents:

- 2.2 We may process data about your use of our website and services ("**usage data**"), which we obtain through our analytics tracking systems. The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. We process it for the purposes of analysing the use of our website and services.
- 2.3 We may process information contained in or relating to any enquiry or communication that you send to us or that we send to you ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication, as well as any contact details you may provide to us such as your name, email address, phone number, job title, address, social media username and feedback surveys. We process correspondence data to communicate with you for purposes such as service communications, requests for feedback or participation in the interviews you mention below, support queries and so on. We may use comments and

feedback in correspondence to improve our products and services and assess user experience. If you have indicated your interest in our services then we may also process correspondence data to provide you with occasional news about our services and marketing communications (although you will be free to unsubscribe at any time).

Data relating to Researchers & Participants:

- 2.4 We may process the account data ("**account data**") you provide to us when registering for a Prolific account (or a user account on our Community Forum), which may include your name, email address, phone and address (and, in connection with our Community Forum, a "nickname" for posting). The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, and communicating with you.
- 2.5 If one of your friends or colleagues refers you to our service, they may provide us with your email address so we can send you an introductory email with a signup code. We will only use your email address (we'll call this a "**referee email address**") to send you that introductory email. We will not retain it or otherwise use it (unless you then choose to sign up for our service or mailing list).
- 2.6 If you choose to take part in any user interviews, whether through chat functions, by audio or video, we may record those interviews and, unless the recordings are anonymized, they will be personal data ("**interview data**"). We use interview data for user research, training and product improvement.
- 2.7 We provide a Community Forum for our researcher users at <https://community.prolific.co/>. We may process any personal data which you include in any forum post, comment or edit which you choose to post in the forum. We call all of this "forum data". We do not pre-moderate or have any control over what you include in forum data, so we ask that you carefully consider your own privacy in deciding what to post, especially since forum posts are public and visible to anyone browsing the forum. Because forum data is determined by you, it could potentially include special categories of data, such as data about race, ethnic origin, politics, religion, health, sex life or sexual orientation and if you post that data you consent to our processing it. We will also record your IP address in relation to each forum post – this means that users who post unlawful or abusive content can be banned, and, if necessary, their ISP or law enforcement can be provided with an IP address for investigation. We use forum data to provide users with the features of our forum. We may also re-post particularly interesting forum posts and discussions on our blog, website or in social media.

Data relating to Participants:

- 2.8 We may process your information included by you in your personal profile on our website ("**profile data**"). The profile data may include your gender, date of birth, relationship status, interests and hobbies, educational details and employment details and other categories. The profile data which we process may also

include *special categories of data*. This data may include data about *race, ethnic origin, politics, religion, health, sex life or sexual orientation*. We process profile data for the purposes of demographic screening.

- 2.9 If you use a third-party application like Facebook to log into your account on our website, then we may receive and process account data from the relevant third party, which we use to verify your login.
- 2.10 We may process information relating to payments we make to you ("**payments data**"), which may include your contact details, your payment account details and the transaction details. We process this for the purposes of paying rewards to you.
- 2.11 Shortly after your account has been opened, we will conduct several ID checks. We will verify your email address and telephone number by sending you verification messages. We will also verify your ID, which will require you to provide us with a copy of your photo ID, like your passport or driver's licence, together with a selfie to compare to that document. Depending on the verification tool we use, we might ask for proof of address. Your selfie photo, photo ID, proof of address and the information associated with or visible on them (such as your name, date of birth, phone number, email address and physical address) are all together your "**ID Data**". We will use the ID Data to verify your identity for fraud prevention purposes.
- 2.12 We may process your information provided by you for the purposes of study listings ("listing data"). This might include your name, role, institution and any further information you choose to add to the study description. We process this information in order to display study listings to potential participants in your study.

Screeners and Studies run by Prolific:

- 2.13 Prolific may conduct short surveys (for example, with one question) for screening purposes. Your responses to those screening surveys will be saved to your profile (and will therefore form part of your profile data as described above). Like the rest of your profile data, your responses will be used for demographic screening to establish your eligibility for studies and may contain special categories of data. Your responses can be removed by you from your profile at any time.
- 2.14 Prolific may also conduct surveys using the Prolific platform as a Researcher. We may process your information submitted by you in these studies ("Prolific study data"). The Prolific study data may include your gender, date of birth, relationship status, educational details, employment details and other categories. The Prolific study data which we process may also include special categories of data. This data may include data about race, ethnic origin, politics, religion, health, sex life or sexual orientation (which we will delete immediately after calculating the study results). We process Prolific study data for the purposes of research, survey eligibility, account status, data quality and fraud prevention.

2.15 Short screener surveys, and research surveys conducted by Prolific, are conducted using the 3rd party software Typeform. Typeform S.L. may collect and process personal data on our instructions and our behalf as our data processor. Typeform's privacy policy is available at <https://admin.typeform.com/to/dwk6gt>.

Data relating to Researchers and to our suppliers and commercial partners:

2.16 We may process information relating to transactions that you enter into with us through our website or by other means ("**transaction data**"), such as the supply or purchase of goods or services. The transaction data may include your contact details, your card details and the transaction details, and any associated documentation such as purchase orders (POs) or invoices. The transaction data may be processed for the purposes of supplying or receiving the purchased goods or services.

Our other processing

2.17 We may also process any of the data described above:

- a) for the purposes of record-keeping and hosting, back-up and restoration of our systems;
- b) as required by law or in connection with legal claims; or
- c) in order to protect your vital interests or those of another individual.

Our legal bases of processing

2.18 We will process personal data only on lawful bases. In particular, we will process personal data on the following lawful bases identified in Article 6 GDPR:

- a) for the performance of a contract with you, or to take steps at your request prior to entering into a contract with you (Article 6(1)(b) GDPR). This may be our basis for processing correspondence data, account data, profile data, forum data, payments data and transaction data;
- b) for our legitimate interests (Article 6(1)(f) GDPR). This may be our basis for processing:

correspondence, account and profile data, interview data, forum data, referee email addresses (as we have an interest in properly administering our business and communications, developing our relationships with interested parties, and using feedback to improve our products and services);

transaction data and payments data (as we have an interest in making and receiving payments promptly and in recovering debts);

any personal data identified in this Policy where necessary in connection with legal claims (as we have an interest in being able to conduct and defend legal claims to preserve our rights); and

any personal data identified in this Policy in connection with hosting, backups and restoration of any element of our IT systems or databases containing that personal data (as we have an interest in ensuring the resilience of our IT systems and the integrity and recoverability of our data);

Prolific study data, as we have an interest in ensuring the quality of data provided to researchers, ensuring that users participate only in surveys for which they are eligible, and ensuring fraud prevention

listing data as we have an interest in displaying study listings to potential participants in your study.

ID Data (as we have an interest in preventing fraud from taking place through our platform and ensuring a positive user experience);

- c) your express consent to the processing (Article 6(1)(a) GDPR). This is our lawful basis for processing special category data comprised in your profile data, or Prolific study data, or forum data.

3. Automated decision-making

3.1 We will use your personal data for the purposes of automated decision-making in relation to survey eligibility, account status and fraud prevention.

3.2 This automated decision-making will involve assessing your account data, profile data, usage data and Prolific study data, in order to assess eligibility, data quality and for fraud prevention.

3.3 In particular:

- a) if a survey is only available to users with a specific profile (e.g., users in a specific territory or of a specific gender or level of qualification) then your eligibility may be determined automatically;
- b) if your responses to screening or check questions indicate a low quality of data (for example, due to a lack of attention or accuracy in your responses) or if any data inputs indicate fraud then your eligibility to participate in our platform or in surveys may be determined automatically.

4. How we provide your personal data to others

Disclosures to our suppliers

4.1 We may disclose your personal data to our suppliers or contractors in connection with the uses described above. For example, we may disclose:

- a) any personal data in our possession to suppliers which host the servers on which our data is stored;
- b) transaction and payments data to our payment services providers Braintree and Paypal. We will share transaction and payments data with our payment services providers only to the extent necessary for the purposes of processing

payments, refunding such payments, and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at:-

<https://www.braintreepayments.com/en-gb/legal/braintree-privacy-policy>

<https://www.paypal.com/en/webapps/mpp/ua/privacy-full>

- c) usage data and account data for the purposes of analysing the use of the website and services, account verification and for fraud prevention, to protect ourselves and our users from attempts to commit fraud or to contravene our terms of use.
- d) ID Data to ID check providers (currently we use Berbix, Inc., whose privacy policy can be read here <https://terms.berbix.com/terms/privacy>).

Disclosures to Researchers

4.2 We will not disclose personal data between Participants and Researchers, although Researchers will see anonymised demographic data relating to Participants for screening purposes. If you are a Participant and you agree to participate in any study posted by a Researcher, then any personal data you disclose to the Researcher (whether through Prolific or otherwise) will be used by that Researcher as a data controller in its own right, and we are not responsible for any such use. If you are a Researcher, then it is your responsibility to ensure that you have performed your legal obligations as data controller in relation to any personal data you may receive, and in particular, to ensure that you have provided all information required by law prior to the collection of any such personal data and ensured that any transfer of such personal data outside the EEA is lawful.

Other disclosures by us

- 4.3 We may disclose your personal data as necessary to comply with law (e.g., to Government or law enforcement) or in order to protect your or another individual's vital interests. We may also disclose your personal data where necessary for us to establish, exercise or defend legal claims.
- 4.4 We may disclose your personal data to our legal or professional advisors in order to take advice but will do so under obligations of confidentiality.
- 4.5 If any part of our business or operations is sold or transferred to, or integrated with, another organisation (or if we enter into negotiations for those purposes), your personal data may be disclosed to that organisation.
- 4.6 Personal data that you make available to other users or public may be seen by other users of our website. For example, if you are a Researcher and publish study details including your name, this may be visible to other users, and if you make a forum post anyone browsing the forum can see it. We may also repost forum posts in other public websites like our blog or in social media. We cannot prevent the use (or misuse) of personal data by others.

5. International transfers of your personal data

- 5.1 Some of the third parties to whom we may transfer your personal data, discussed above, may be located outside the EEA or may transfer your personal data to their own service providers located outside the EEA. If so, then we will ensure that transfers by our appointed data processors will only be made lawfully. You may contact us if you would like further information about these safeguards.
- 5.2 Anyone using our website and viewing information which you have made available to other users or posted publicly in the forum could be located anywhere in the world.
- 5.3 Researchers may be located outside the EEA and, as described above, are responsible for ensuring that any transfer of personal data to them in connection with any study is lawful.

6. How we retain and delete personal data

- 6.1 We comply with our legal obligations in relation to the retention and deletion of personal data, and in particular, we ensure that personal data that we process is not kept for longer than is necessary for the relevant purposes.
- 6.2 We will retain your personal data as follows:
 - a) most data associated with any account on our website (including account data, profile data, and correspondence data) will be kept during the life of the account and then deleted no more than twelve (12) months after account closure. If an account is dormant for more than twelve (12) months then we may close that account and delete all associated data. As an exception, we may retain data related to dormant accounts if they have any outstanding balances associated with them, until that balance has been cleared, in order to ensure we can pay out or dispose of that balance lawfully. You can also delete some profile data yourself (for example by deleting answers to your screening questions) in which case we will cease to process that data;
 - b) correspondence data which relates only to enquiries and not to any business relationship with us or any account will be retained for the period of the enquiry or chain of correspondence and then deleted after approximately twelve months;
 - c) transaction and payments data will be retained for up to seven (7) years following the relevant transaction or payment (as we are obliged to keep records for tax compliance purposes);
 - d) encrypted phone numbers may be stored for up to seven (7) years for the purposes of fraud prevention;
 - e) correspondence data relating to any business relationship we may have with any person may be retained for approximately six years after the end of the relevant business relationship (in order to ensure that we have kept records of

that business relationship for the applicable limitation periods prescribed by law);

- f) usage data will be deleted within twelve (12) months of creation;
- g) we will potentially keep study data up to 12 months, but in the case of study data which is special category data, will delete it immediately after processing;
- h) Prolific study data will be deleted within twelve (12) months of creation, except where it is special category data, which we will delete immediately after calculating the study results;
- i) forum data will remain visible in our forum indefinitely, but may be deleted on request. It may not always be possible to delete all forum data if the relevant posts have been reposted or quoted by other users or otherwise republished;
- j) we will delete referee email addresses immediately after sending the introductory email and signup code;
- k) ID Data may be stored for the purposes of fraud prevention, for as long as we reasonably determine is proportionate and necessary based on the incidence of user fraud.

6.3 We may retain your personal data longer:

to comply with law;

to protect your vital interests or those of another individual; or

in connection with any legal claims (to the extent those claims are continuing after the end of the relevant retention period).

6.4 Finally, we may create anonymized or aggregated records relating to demography or the use of our website or services, from which no individual is identifiable (for example, it might be useful for us to track the overall demographics of users of our website). We may retain those records, which are not personal data, indefinitely.

7. **Security of personal data**

7.1 We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.

7.2 We will store all your personal data on secure servers, personal computers and mobile devices.

7.3 Data relating to your financial transactions that is sent from your web browser to our web server, or from our web server to your web browser, will be protected using encryption technology.

7.4 You should ensure that your password is not susceptible to being guessed, whether by a person or a computer program. You are responsible for keeping

the password you use for accessing our website confidential and we will not ask you for your password (except when you log in to our website).

8. Amendments

- 8.1 We may update this Notice from time to time by publishing a new version on our website.
- 8.2 You should check this page occasionally to ensure you are happy with any changes to this Notice.
- 8.3 We may notify you of changes to this Notice by email or through our website.

9. Your rights

9.1 We have summarized below the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. You can read guidance from the Information Commissioner's Office at www.ico.org.uk for a fuller explanation of your rights. In particular, you have:

- (a) **the right to access:** if requested, we must confirm what personal data of yours we process, and must provide you with access to that data and further information about our processing;
- (b) **the right to rectification:** if requested, we must correct or complete any inaccurate or incomplete personal data of yours;
- (c) **the right to erasure:** you can request that we erase your personal data in limited circumstances (e.g., if we use it for marketing or no longer need it for our other purposes). This is not an absolute right and we may be entitled to retain your data where necessary (e.g., to comply with law);
- (d) **the right to restrict processing:** you can request that we restrict the processing of your personal data in limited circumstances. Where processing has been restricted, we may continue to store your personal data and will observe the restrictions on processing except in the case of processing permitted by applicable law (for example, in connection with legal claims or for reasons of public interest);
- (e) **the right to object to processing:** you can object to our processing of your personal data on the basis of our legitimate interests. We may be entitled to continue processing in certain circumstances (e.g., if we have compelling grounds to do so, or to comply with law);
- (f) **the right to data portability:** you have a right to receive your data from us in an easily-portable format in limited circumstances: that is, if we process that data on the basis of a contract with you and by automated means. This is unlikely to apply in most circumstances; and
- (g) **the right to complain:** if you believe we are in breach of applicable law, you can complain to the Information Commissioner's Office (in the UK) or,

if you live or work in another EU member state, a supervisory authority responsible for data protection in that member state.

9.2 You may exercise any of your rights in relation to your personal data by written notice to us.

10. Third parties

10.1 Our website includes hyperlinks to, and details of, third party websites.

10.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties, including (for example) Researchers, third party survey platforms, or social media operators.

11. Personal data of children

11.1 Our website and services are targeted at persons over 18.

11.2 If we have reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data.

12. Updating information

In most cases we provide you the facility to update this via our platform. Otherwise please let us know if the personal information that we hold about you needs to be corrected or updated.

13. About cookies

13.1 When you use the Site it will store data on your device by two methods: web storage and cookies. Web storage means the storage of data within your browser. A cookie is a small file, which is stored on the device which you use to access the Site. You can read more about web storage at https://en.wikipedia.org/wiki/Web_storage and about cookies at <http://aboutcookies.org>.

The web storage and cookies we use allow us to monitor the use of the Site and to improve our service offering. The following section describes what kinds of cookies we use.

14. Cookies that we use

14.1 We use cookies for the following purposes:

- (a) authentication – we use cookies to identify you when you visit our website and as you navigate our website;
- (b) status – we use cookies to help us to determine if you are logged into our website; and
- (c) cookie consent – we use cookies to store your preferences in relation to the use of cookies more generally.

15. Cookies used by our service providers

15.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website for the purposes stated below.

Service Provider	Purpose	Privacy policy
Google Analytics	Analyse use of website through information gathered by means of cookies; used to create report on use of our website	https://www.google.com/policies/privacy/
<u>Google reCAPTCHA</u>	For fraud prevention through use of cookies	https://www.google.com/policies/privacy/
Amplitude	Analyse use of website through information gathered by means of cookies; used to create report on use of our website	https://amplitude.com/privacy
Appcues	To host content through information gathered by means of cookies	https://www.appcues.com/privacy
Helpscout	To communicate with our users through information gathered by means of cookies	https://www.helpscout.net/company/legal/privacy/
<u>Zendesk</u>	<u>To communicate with our users through information gathered by means of cookies</u>	https://www.zendesk.co.uk/company/customers-partners/privacy-policy/
<u>Pusher</u>	<u>To handle real-</u>	https://pusher.com/legal/privacy-policy

	<u>time data</u> <u>updates through</u> <u>information</u> <u>gathered by</u> <u>means of cookies</u>	
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16. Managing cookies

16.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

16.2 Blocking all cookies will have a negative impact upon the usability of many websites.

16.3 If you block cookies, you will not be able to use all the features on our website.

17. Our details

17.1 This website is owned and operated by Prolific Academic Ltd.

17.2 We are registered in England and Wales under registration number 08991598, and our registered office is at 81 St. Clements Street, The Wheelhouse, Angel Court First Floor, Oxford, Oxfordshire, England, OX4 1AW.

17.3 Our principal place of business is at 81 St. Clements Street, The Wheelhouse, Angel Court First Floor, Oxford, Oxfordshire, England, OX4 1AW.

17.4 You can contact us:

- (a) by post, to the postal address given above;
- (b) using our website contact form;
- (c) by email, using support@prolific.ac.

18. Data Protection Registration

18.1 We are registered as a data controller with the UK Information Commissioner's Office.

18.2 Our data protection registration number is ZA317731.

19. Data Protection Officer

Our data Protection Officer's contact details are: dpo@prolific.ac

20. EU Representative

20.1 For Data Subjects in the EU:

If you want to make use of your data subject rights, please visit: <https://gdpr-rep.eu/q/18862131>

Contact - GDPR-Rep.eu - Maetzler Rechtsanwalts GmbH & Co KG, Attorneys at Law, c/o Prolific Academic Ltd, Schellinggasse 3/10, 1010 Vienna, Austria

<https://prighter.com>

Please add the following subject heading to all correspondence: **GDPR-REP ID: 18862131**