

Sample Privacy Policy

NOTE: This privacy policy was developed by a multi-stakeholder group of privacy advocates, publishers, legal counsel, government officials and academics for local media companies and is GDPR and CCPA compliant. Publishers may adopt it or use it as a basis to develop their own.

{Publisher Logo}

Privacy Policy (DRAFT)

You've reached the Privacy Policy for {Publisher}.

OVERVIEW OF OUR PRIVACY POLICY

This privacy policy outlines how we collect, use, share and protect your personal information.

Privacy Values	Data Collection and Sharing	Privacy Control
<ul style="list-style-type: none">• We respect you and your data.• We will not collect or share your data without your permission - period.• See our Privacy Values.	<ul style="list-style-type: none">• We collect data you give us (name, email, home address, etc.) and data from your device (computer "IP" address, hardware, etc.).• We won't share your data without permission and will only share it with companies that comply with our privacy policy.	<ul style="list-style-type: none">• We've created privacy controls to help you manage your data with us.• You can decide what data you'd like to share and when you'd like to access, correct, delete or move your data.• Manage your privacy controls.

If you have questions about our privacy policy, please contact us at privacy@{publisher}.com.

You can also [watch a video or listen to audio](#) about the policy.

This privacy policy governs privacy practices of our websites and digital services. You may also view our [Terms of Service](#).

{Publisher} PRIVACY VALUES

- 01 Privacy is a fundamental right. Data represents people who deserve privacy, respect, autonomy, and fairness.
- 02 Personal data should be protected to the highest standards of privacy and security.
- 03 Individuals should have control over personal data that is viewed, collected, shared or used.
- 04 Individuals can easily and persistently see and control their data that is viewed, collected, shared or used..
- 05 Personal data viewed, shared or used should be limited.
- 06 Individuals should derive some value and benefit from providing access and use of their data.
- 07 Individuals can easily access, understand and use data controls in multiple languages and audio or video formats.
- 08 Individuals can access, delete, move, and correct their data held by any entity.

PRIVACY POLICY SECTIONS

Our privacy policy is organized into the following sections:

- | | |
|------------------------------------|----------------------------------|
| 1. Definitions | 4. Data We Share and Why |
| 2. Data We Collect and Why | 5. Keeping Your Data Safe |
| 3. How to Control Your Data | 6. Know Your Rights |

1.0. DEFINITIONS

The definitions below may help you understand some of the words and phrases in this privacy policy.

Aggregate metadata

- This is data about other data.
- For example, metadata for a photo might be when it was taken or file size.
- Aggregate means compiling different types of data into a group.
- Aggregate metadata about a you may be used to display relevant content or ads.

Geolocation information

- Where something is located in the world, usually via an internet device.
- Data can be derived through GPS, cell networks or your IP address and gives us an idea of where your device is located to target content or ads (with your permission) and to combat fraud.

2-step (two-factor) verification

- Helps us identify you when you log by using two forms of authentication (e.g., sending a code to your phone or email).

Cookies

- Small text files that send a message from a web browser to a web server.
- Used to identify you, store your login or send you personalized content or ads.

2.0. DATA WE COLLECT AND WHY

There are two basic ways we get data about you:

Directly from you	Indirectly from you
<ul style="list-style-type: none">● Personal data you share (e.g., email or address) when you voluntarily sign up for a newsletter, subscription or other service.● If you give us permission, we use this information to personalize your content and advertising, send you offers or fulfill a service.	<ul style="list-style-type: none">● Data we collect from your device (e.g. type of device or IP address).● This data helps us display content correctly on all your devices and protects you from malware and fraudulent advertising.

TYPE OF DATA WE COLLECT

2.1. Account Data <ul style="list-style-type: none">● To access our content or services, you may need to register and provide personal data to set up an account (e.g., name, email).● You can update, change or cancel your account at any time.● If you register as “anonymous” you only need to provide your zip code however, you may not be able to access some of our content.	2.2. Your Email Address <ul style="list-style-type: none">● We will only use your email address to communicate services you’ve requested (e.g., newsletters) or information about your account.● It will also be used if you enable 2-step verification and provide a password recovery email.
2.3. Your Location <ul style="list-style-type: none">● We collect data about your location (e.g., zip code) when you visit our site to deliver you relevant local news content.● We don’t collect precise geolocation data (your location at any given time).	2.4. Children <ul style="list-style-type: none">● We don’t knowingly collect or solicit information from anyone under the age of 18 or allow them to register for an account.
2.5. Cookies <ul style="list-style-type: none">● Cookies are small text files placed on your browser that may identify you, store login data, record your IP address, or track your online activities.● If you share your data (e.g., register), we place a cookie on your browser that identifies you and logs you in each time you visit our site.	<ul style="list-style-type: none">● Some cookies essential for services to work (e.g., payments) can’t be blocked.● We don’t use cookies for advertising without permission.● Some services may be delivered by 3rd party vendors who may have separate cookie policies.

3.0. HOW TO CONTROL YOUR DATA

3.1. Privacy Controls

Privacy controls help you determine the personal information you'd like to share with us or advertisers. We require all our partners to abide by the terms of this privacy policy. [Manage your privacy controls here.](#)

DATA SHARING OPTIONS

Personalize Content and Advertising	Personalize Content Only	Do Not Share My Personal Information
<ul style="list-style-type: none">• Your data will be shared with advertisers to target advertising so ads will be more relevant to you.• We only provide advertisers access to data you've agreed to share.• If you agree to this option, we'll provide a notice to you at the time of collection.	<ul style="list-style-type: none">• Your data will only be used to personalize content.• You'll still see ads but they may not be as relevant.	<ul style="list-style-type: none">• No personal data will be collected or shared with anyone for any reason including advertising, research, profiling, statistical, scientific, or direct marketing.• You will still see content and advertising but it may not be as relevant.

4.0. DATA WE SHARE AND WHY

4.1. Payment Information

- We don't process consumer payments and instead rely on trusted third-party payment providers (like banks or Paypal) that meet our high standards.
- We accept payment information through online forms or the phone but don't share data with entities other than payment providers that handle and store your credit card details.
- Payment providers we use are completely independent and have different privacy policies.
- [See a list of our payment providers.](#)

4.3. Law Enforcement Authorities

- Occasionally law enforcement agencies request data from us.
- We only provide data when required by law.
- Our annual transparency report lists each legal data request and the result of the inquiry. [See our transparency report.](#)

4.5. Advertisers

- Advertising can help you learn about products and services and also helps us fund journalism.
- You determine what, if any, data you are willing to share with advertisers.

4.2. Third Parties

- Third parties is another word for "companies we do business with."
- We don't sell, lease, or share your data without your permission.
- With your permission, we might share data with companies that help us understand how you use our website, send you email, provide customer support, process payments, or target advertising.
- We only work with companies we trust and they are required by contract to keep your data confidential and secure and adhere to our privacy policy.
- [See a list of companies we work with.](#)

4.4. Subscriptions

- If you subscribe to access our content, we'll collect some personal data from you such as your name, email or address.
- Your data will not be shared with other entities (e.g., advertisers) unless you give us permission.
- With your permission, we may allow advertisers to access your data so ads are more relevant for you. They may track sites you visit, pages you view or ad you clicked on using tools like cookies, JavaScript, location data, etc.

5.0. HOW WE KEEP YOUR DATA SAFE

5.1. Encryption	5.2. Data Retention	5.2.1. Minor Exceptions to Data Retention
<ul style="list-style-type: none"> • Data about you is encrypted (stored in a way to prevent access by unauthorized users) and is stored in several data centers in different jurisdictions. • We use end-to-end encryption for communication which means all data is encrypted with a digital file (a “key”) that only you and the recipient know. • There is no way for us or anybody else to access this information without direct access to your device. 	<ul style="list-style-type: none"> • Data you provide (e.g., name, email, address) will only be stored for as long as necessary to fulfill services, such as account log in or ad delivery. • If you become a member or subscribe, we may hold data about you, with your permission, for a longer period of time to better deliver relevant content, up to 13 months unless you agree to a longer time period. 	<ul style="list-style-type: none"> • In some cases, after you unsubscribe from an email newsletter or subscription, we may retain your data for a commercially reasonable time for backup, archival, or audit purposes. • We’ll let you know if this is the case. • Information you choose to make public may not be removable, such as comments.

6.0. YOUR RIGHTS REGARDING YOUR DATA

(1) get a copy of your data	(2) delete or amend	(3) restrict or object	(4) correct	(5) lodge a complaint
in a machine-readable format so you can move, copy or store it with another entity	your personal data* <small>* There are exceptions to this under the California Consumer Privacy Act</small>	to the automated processing of your data or have a person make decisions that have legal effect	any inaccurate or incomplete data we have about you	With the Federal Trade Commission about how we process your data; contact us at privacy@{publisher}.com ; or call [toll free number].

6.2. Account Self-Destruction

If you stop visiting our websites for at least 12 months, we’ll email you to see if you’d like to deactivate or delete your account. If we don’t hear from you after an additional 6 months, we’ll ask once more. If we don’t hear from you, your account and personal data will automatically be deleted.

Contact us at privacy@{publisher}.com or toll-free at [publisher number] with any questions or concerns.

OTHER IMPORTANT INFORMATION

7.0. Changes to This Policy

- We will not make changes to this policy without letting you know or make changes that clearly violate our core privacy values.
- If we need to make changes that impact your data or the delivery of our services, we'll let you know in advance so you can review the changes, adjust your privacy settings or delete your account.

8.0. Complaints and Questions

- Got an issue? Let us know and we'll fix it if we can.
- You have a right to complain or ask questions related to this privacy policy and how we use your personal information.
- Email us at [{privacy@{publisher}.com}](mailto:privacy@{publisher}.com) or call {toll-free number} or visit {website link}.
- You can also file a complaint with the United States Federal Trade Commission (FTC), a government agency that broadly oversees fraud and deception in the marketplace.
- [Visit the FTC's Consumer Complaint Center](#)

9.0. Regulations

- Links to the laws that inspired this policy.
- [EU General Data Protection Regulation](#)
- [California Consumer Privacy Act](#)