

COD Privacy Policy and GDPR compliance

2022-07-15

The Crystallography Open Database (COD), running at <https://www.crystallography.net/cod/>, was built with confidentiality of personal information in mind since its very inception in 2003, i.e. long before GDPR was even created. This is because the founders and maintainers value freedom, right to access scientific information as well as the privacy of individuals. We were always against manipulating someone's personal data behind their back, without the person knowing about it. Consequently, we collect only a very minimal amount of information about our visitors and data providers, the minimum that is absolutely necessary for the efficient operation of the COD.

You do not need to register, login, or otherwise reveal your identity if you are *downloading* data from the COD. COD data are in the public domain (licensed under CC0), and thus you may copy the COD even from sources other than the COD website. For example, you may distribute the COD inside your company or your university from internal servers. We do not track such distributions.

When you connect to the COD website, our Web server registers standard information that Apache2 is set up to register by default: the client IP address, the access timestamp (date and time) and the browser type (aka "user agent"). This information is not revealed publicly. It is used internally for technical and organisational purposes, such as balancing the load of our servers, detecting potential cyberattacks and defending against them, and counting the number of unique visitors. We *may* publish aggregated statistics on numbers of unique visitors, countries from which the visitors come (based on IP geolocation), numbers of visitors and visits per country as well as numbers of visits in different time spans. The aggregated statistics might be used to justify requests for the financing of the COD. In no case will we reveal your IP address or other information that might identify you.

For depositing data, we ask you to create an account on the COD server and identify yourself using this account. Upon creating an account, in addition to the data stored when you access the COD in a read-only manner, we always store your personal name which you provide to us, your working e-mail address, your encrypted password and your account creation date. We will check that the e-mail address you have provided is valid by sending you a confirmation e-mail, but we will not otherwise try to identify or track you as a physical person. You can, however, voluntarily provide and optionally publish your personal information items such as your ORCID iD, your home page URI or information about your affiliation; this may be used to associate your depositions with your published works or with the organisation your work in. Optionally, we will also store information about your education and your scientific interests, if you choose to provide such information. Only your name, e-mail address and password are mandatory for depositing data. None of this information will ever be made public or transferred to third parties, except in cases when we might be obliged to do so under Lithuanian law.

When you deposit a data set, we record when and what data you have deposited, and associate it with your account. This information is needed to ensure integrity, validity and provenance of data that enters the COD repository. In case of questions regarding the data, we might send you an occasional e-mail asking for a clarification on how the data have been obtained, why are certain

aspects of the data recorded, ask for additional data or the original publication associated with that data, etc. We might also send you a reminder when the hold period for your data which you have deposited with the "on-hold" option expires and the data are about to become public. We might also send you personal e-mails from the COD maintainers discussing possible use of the COD data or possible collaboration opportunities.

Exception to the publication rule is when you deposit data under your claimed authorship. Since all records in the COD are public (CC0), your name and surname will be published on the COD website, either immediately after deposition or after a certain hold period. No other information will be published. In particular, your e-mail address will not be included into the public COD record, unless you choose to do this yourself by inserting your e-mail address into the submitted CIF file. The handling of your name and your deposited data follows the same rules as the handling of your name and other data when you publish a scientific paper. In fact, a COD deposition can be regarded as a kind of scientific publication.

You have a moral and legal right to alter you personal data records, ensure that these records have correct information and delete your personal account from the COD server. If you have *not* deposited any structures to the COD, your account will be, as a rule, deleted immediately upon your request, except in the cases when the logs indicate that the account might have been used for some illegal activities. In that case information might be retained for a certain period necessary for investigation of the activities, after which it will be completely deleted as permitted and required by Lithuanian law.

If you *have* deposited data to the COD, then, if you request to remove your account, we will delete, as in the case before, the information from your account record, i.e. we will remove your name, e-mail address and encrypted password, together with all optional information that you have provided. We will, however, retain the numeric user ID of that account that is associated with the depositions you have done, and the depositions themselves. Your name will also be retained in the published COD records. The depositions are regarded as factual statements about nature made under your name, and treated as scientific publications. You cannot "unpublish" or "unauthor" a scientific paper; in the same way, you cannot simply delete a COD crystal structure record that was made public. You can and may, however, withdraw or retract your COD record (again, in a way similar to the retraction of scientific papers). If you choose to do so, the corresponding COD record will be marked as such and moved to the retracted record directory.

All data are stored and processed in Vilnius, Lithuania, Vilnius University Life Sciences Center on the basis of legitimate interest. In case you need to correct your personal data records, you can use the Web interface to edit your personal data form or e-mail us at cod-bugs@ibt.lt. If you wish to delete otherwise modify your account, please e-mail us at cod-bugs@ibt.lt and we will respond within a reasonable time as mandated by the law.

The COD Advisory Board