Privacy and Cookie Policy

hetq.am · Investigative Journalists NGO

Last updated: [date]

Part 1. Privacy Policy

1. Who we are

The hetq.am website is published by the Investigative Journalists NGO (“Hetq”, “we”, “us”), registered in the Republic of Armenia at 3a Pushkin St., Yerevan, taxpayer identification number (TIN) 02554073, state registration number 211.171.02497 with the State Register of the RA Ministry of Justice. We are responsible (the data controller) for the personal data described in this policy.

Contact for privacy questions: hetq@hetq.am, +374 10 563363.

2. Our commitment

As an investigative newsroom, we consider protecting the people who read us, support us and trust us with information to be part of our mission. We collect as little personal data as possible, we never sell it, and we treat information received from sources with the highest level of confidentiality (Editorial Policy, Sections 3 and 5).

3. What data we collect and why

3.1. Website visitors. When you visit hetq.am, our servers and service providers automatically process technical data: your browser and device type, the pages you visit and the time of your visit. This data is analyzed using Google Analytics, and IP addresses are anonymized. We use it to run the website, keep it secure (for example, to protect it against attacks) and understand, in aggregated form, which content is read.

3.2. Newsletter subscribers. If you subscribe to our newsletter, we process your email address [and name] in order to send you the newsletter. You can unsubscribe at any time using the link in every email.

3.3. Supporters and donors. If you support us through Patreon, Boosty or another platform, payments are processed by that platform under its own privacy policy. We receive only the information the platform shares with us (for example, your name, email address and support level), which we use to thank you, provide member benefits and keep the financial records required by law. We do not receive or store your bank card details. We may thank supporters publicly only without disclosing personal data, unless you have agreed otherwise.

3.4. People who contact us or provide information. If you write to us by email, Signal, WhatsApp or Telegram, through any of our social media pages, through the website’s email address or through the comment field of our articles, we process the information you provide in order to respond. Information sent to us as a potential source is handled under our source protection rules: only the journalists and editors directly involved have access to it, it is stored securely by the Investigative Journalists NGO within the limits of its powers, and we will never reveal your identity without your consent (Editorial Policy, Section 3). For sensitive information, please use our dedicated channel: Signal +374 94 563363. Please do not send sensitive material by ordinary email or social media.

3.5. Comments and requests for correction. If you comment on our content, ask us to correct a publication or ask for an opportunity to reply, we process your name, contact details and message in order to handle your request.

3.6. Event participants, job applicants and partners. If you register for our events or training, apply for a job or work with us, we process the information needed for that purpose (for example, contact details and CVs).

4. Legal bases

We process personal data on the following grounds, in accordance with the Law of the Republic of Armenia on Protection of Personal Data [and, where applicable, the EU General Data Protection Regulation (GDPR)]:

- your **consent** (for example, newsletter subscription and non-essential cookies), which you can withdraw at any time;

- the **performance of a contract** or steps taken before entering into one (for example, member benefits, job applications);
- compliance with **legal obligations** (for example, accounting and tax records);
- our **legitimate interest** in ensuring the secure operation of the website, studying audience behavior and preferences in aggregated form, and responding to users' messages, while respecting their rights and freedoms;
- the **public interest in journalism and freedom of expression**, as regards personal data contained in our publications.

5. Personal data in our journalism

Our articles may contain personal data about people, especially public officials, in the public interest. This processing is carried out for journalistic purposes, in accordance with our Editorial Policy, the law and Article 10 of the European Convention on Human Rights. Requests concerning published content (for example, a correction or the right of reply) are handled under the Editorial Policy: write to hetq@hetq.am, addressed to Editor-in-Chief Edik Baghdasaryan (corrections contact).

6. International data transfers

Some of our service providers are located outside Armenia [for example, in the EU or the USA]. When transferring data abroad, we choose service providers that ensure an adequate level of protection and appropriate safeguards.

7. How long we keep data

We keep personal data only as long as necessary for the purpose for which it was collected: newsletter data until you unsubscribe; correspondence for [2 years], unless it needs to be kept longer; financial records for the periods required by law (at least five years, Financial Management Policy, Section 6.2.8); server logs for 180 days. Information received from sources is kept only as long as necessary for the investigation and is then securely deleted or archived in encrypted form.

8. Security

We protect personal data through technical and organizational measures, including encryption, two-factor authentication, restricted access and staff training, in line with our Digital and Information Security Policy. No system is completely secure; if a data breach affects your data, we will inform you where required by law.

9. Your rights

You have the right to:

- know whether we process your data and receive a copy of it;
- ask us to correct inaccurate data;
- ask us to delete your data or restrict its processing, where the law allows;
- object to processing based on our legitimate interests;
- withdraw your consent at any time, without affecting processing carried out before the withdrawal;
- lodge a complaint with the authorized body for the protection of personal data of the Republic of Armenia [confirm the current name of the authority] or, if you are in the EU, with the data protection authority of your country.

To exercise your rights, write to hetq@hetq.am. We will respond within 10 days. These rights may be limited where they conflict with freedom of expression and journalism, or with the protection of our sources.

10. Children

Our website is intended for a general audience. We do not knowingly collect personal data from children under 16 through the website. Where necessary, if the data subject lacks legal capacity, has limited legal capacity or is under 16, consent to the processing of their personal data is given by their legal representative. Work with minors in our journalism follows Section 8 of the Editorial Policy.

Part 2. Cookie Policy

11. What cookies are

Cookies are small text files that a website stores on your device. Similar technologies include pixels and local storage. We use them for the purposes described below.

12. The cookies we use

Category	Purpose	Consent required?
Analytics	Help us understand, in aggregated form, how the website is used (Google Analytics)	Yes
Embedded content and social media	Set by third parties when you view embedded YouTube videos, social media posts or share buttons (YouTube, Facebook, Instagram, X, TikTok, Telegram)	Yes
Advertising	The website displays advertising and uses advertising cookies	Yes

13. Your choices

When you first visit hetq.am, a pop-up window asks for your consent to cookies. You can accept all, reject all or select only the necessary ones, and you can change your choice at any time [via the “Cookie settings” link at the bottom of the website]. You can also block or delete cookies in your browser settings; blocking strictly necessary cookies may affect how the website works.

Part 3. General provisions

14. Changes to this policy

We may update this policy when our practices or the law change. The date of the latest version is shown on the first page. Significant changes will be announced on the website.

15. Contact

Investigative Journalists NGO, 1/3 Buzand St., 8th floor, Yerevan, Republic of Armenia

Email (privacy questions): hetq@hetq.am · Tel.: +374 10 563363 · www.hetq.am