SENSITIVE STORIES: ARCHIVE OR PUBLISH?

How the Red Star Line Museum handles and validates privacy questions using an ethical framework

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INTRODUCTION

Red Star Line: the bridge to a better life

Between 1873 and 1934, the ocean steamships of the Red Star Line shipping company provided a pathway to a new life for some two million men, women, and children. For fortune seekers and those in search of a better life, the United States and Canada were the Promised Land. With their entire lives packed into just a few suitcases, they set off in hope of a brighter future.

The Red Star Line Museum is an authentic place that tells the historical story of the emigrants and sheds light on migration as a universal theme. It tells numerous individual stories that those with their own migration story recognise and are familiar with. As central theme, the museum evokes a feeling of the dream of a better life, saying goodbye, venturing into the unknown and the search for a new home.

The Red Star Line Museum takes you on a moving journey following in the footsteps of the emigrants.
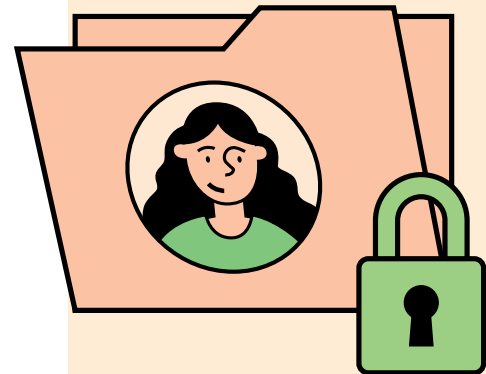
A collection that connects

The museum brings to life poignant and iconic personal stories, from Antwerp to America, of journeys filled with hope and dreams of a better life. This is conveyed not only through objects, but also through our collection of stories, which we are constantly expanding with more contemporary stories about migration. To this end, we record interviews in which we gather, preserve and disclose all this biographical migration heritage. While oral history typically serves to study an object in more depth, in our case, it is the story itself that is the object. Objects, documents and digital files support this story.

In this way we encourage visitors, witnesses, researchers, historians and partners to reflect and engage in dialogue about migration - from the past to the present and into the future. This makes the Red Star Line Museum an authentic place with international allure that not only inspires and informs people but also connects them.

Our method

We want to help our visitors to build a picture of how migration has evolved over the last 150 years. To help them do so, we have collected all kinds of testimonies of past and present migration, including many from outside the Red Star Line shipping line. We conduct interviews and collect these testimonials with concern for fair collaborations.

This is where challenges arise. The challenge with more contemporary stories is that they often involve people who are still alive and may even be in precarious situations. In the age of social media, it is easy to track people down. For instance, what if an interviewee shares traumatic experiences about their former in-laws and mentions them by name? All factual information we present in our museum must carefully balance historical accuracy with respect for the privacy of data subjects.

PRIVACY AND PERSONAL DATA?

Since 2018, the General Data Protection Regulation (GDPR) has been in effect in Europe. Never heard of it? No worries: the GDPR, introduced on 25 May 2018, aims to protect the privacy and personal data of every individual in Europe.

As a museum, we are obliged to comply with this regulation: which, to us, is only logical. From an ethical perspective, we believe that it is important to maintain a strong relationship of trust with those who share stories with us. They open up about their personal lives, and it is our responsibility to handle their information with the utmost respect for their privacy.
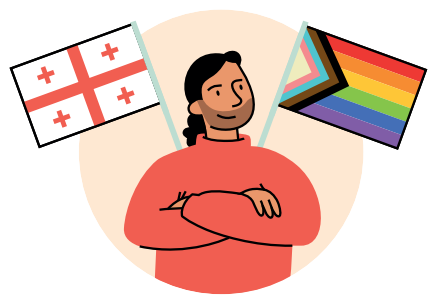
The story of Emzar from Georgia

Meet Emzar. His moving life story immediately highlights the delicate issue of privacy. Emzar was part of the LGBTQIA+ community in Georgia but fled his homeland in 2018 after facing homophobic remarks from his family and subsequent death threats. Now in Belgium, he continues to fight against the homophobic government in Georgia. Together with a friend, he founded an NGO to support the Georgian LGBTQIA+ community.

However, sharing his story publicly carries risks, not only for his own privacy but also for that of his friends, fellow activists, and family. Despite these dangers, Emzar believes it is essential to speak out about the reality of LGBTQIA+ life in Georgia. That is why he chose to share his migration story with our museum, an experience that gave him more confidence and energy as an activist.
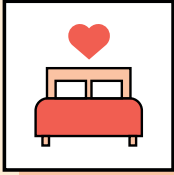
◉ VIEW EMZAR'S STORY

Through Emzar's story, we want to illustrate how our museum works to prevent privacy breaches. When he shares his gripping life story, he also indirectly reveals information about others. This isn't limited to names or photos; even a place of residence or other personal details can be sensitive data that must be handled with care. That is why we follow strict privacy guidelines and ensure that more than just Emzar's consent is obtained before sharing any information.
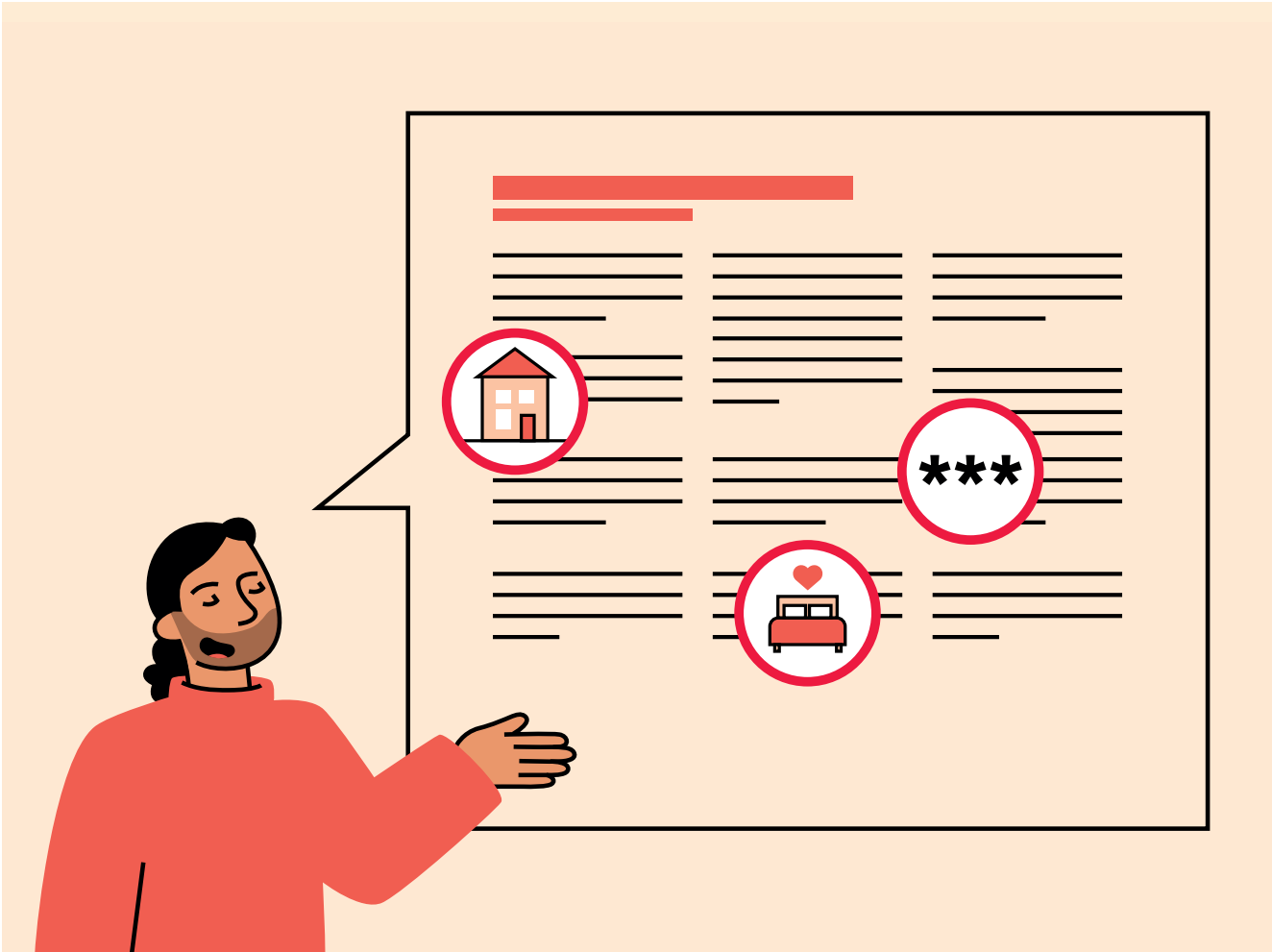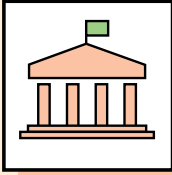
From data to risk

At the Red Star Line Museum, we process a vast amount of data: ranging from newspaper articles and photos to quotes, written narratives, and more. In Emzar's case, we are dealing with an interview. All of this data must be processed responsibly, meaning we must carefully consider who handles the information and how it is used.

Disclosing - or making public - Emzar's story carries significant privacy risks for him, his friends, fellow activists, and his family in Georgia. Do they even want their identities to be made public? Would they be comfortable knowing that anyone could look up Emzar's story? Some people do not want certain stories about them to be shared at all. How would you handle this?

DATA ABOUT SEXUAL LIFE

POLITICAL DATA

UNION RELATED DATA

In the interview, Emzar discusses his sexual orientation, activism, and the political situation in Georgia. This type of information falls under the special categories of personal data or sensitive personal data. You can read all about these categories on page 8.
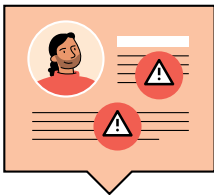
Rights and freedoms

By now, you have realized how important it is to handle privacy with care. But what does privacy actually mean? Natural persons, i.e. people of flesh and blood, have rights and freedoms. These fundamental principles shape our laws, society, and ethical standards. One of these rights is the protection of personal data: in other words... privacy!
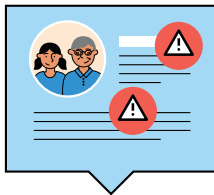
We must always process personal data in an honest way. There must always be a specific purpose attached to the processing and, moreover, everything must always be done with the consent of the data subject(s) (or with another valid legal basis). That is why we cannot simply post a list of all interviewees on our website or disclose their addresses.

The risk analysis

So, we know there are strict regulations around privacy, and we cannot carelessly share personal data. But what does this mean in practice? Have personal stories become off-limits since 2018? Not at all! Instead, we must carefully assess and mitigate risks while verifying the information we collect. This ensures that our collection remains both reliable and complete. Since obtaining consent from all data subjects is often impossible, we rely on a structured risk analysis.

Emzar's story contains a great deal of personal and privacy-sensitive information. If misused, this information could be manipulated or shared inappropriately, resulting in a breach of privacy. This is precisely why we use a tool known as the Data Protection Impact Assessment (DPIA).

With the help of the DPIA, we developed an ethical framework for our collection. We also conducted a thorough risk analysis, our preferred term moving forward instead of DPIA. This risk analysis serves as a useful tool, especially when ethical or legal concerns arise regarding the use of personal stories. You can read more about the different phases of this risk analysis starting on page 6.

A DPIA or risk analysis falls under article 35 of the GDPR and has thus been a legal requirement in Europe since 2018.

Oral history

We use a risk analysis to identify, assess, and properly handle sensitive information across all types of data. While an interview helps preserve memories of Emzar's past life, it also raises important privacy concerns. Given the biographical migration heritage in our museum collection, we developed a structured risk analysis. In doing so, we drew inspiration from The British Library's trusted method for assessing interviews on sensitive topics.

In the following chapters, we outline the steps of our risk analysis, ensuring full compliance with the GDPR.

RISK ANALYSIS APPROACH

Could data processing put someone at risk of physical, material, or emotional harm? In our biographical migration heritage collection, interviews often touch on sensitive themes, like Emzar's story, which can be deeply emotional for everyone involved. This is where a risk analysis serves as a reliable and essential tool.

To avoid all these privacy questions, we stick to a predefined order in the risk analysis. We detail each step in the following chapters:
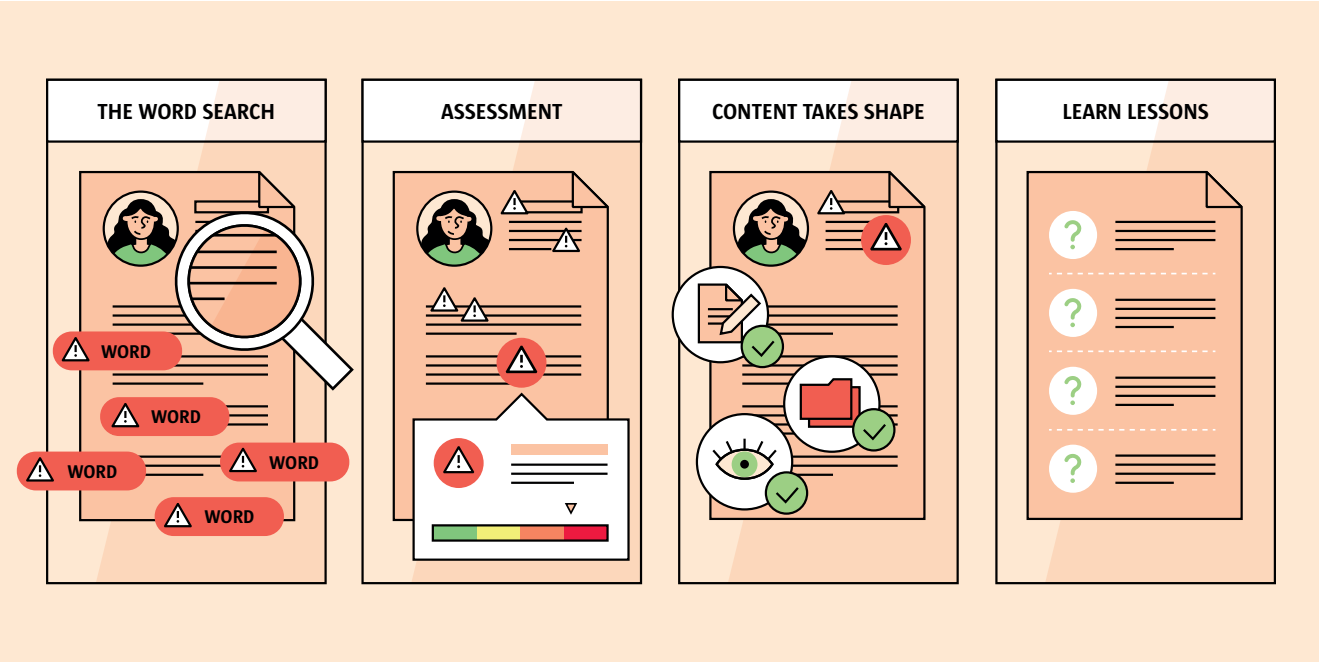
1. The word search

   a.   We first consider the context of the data. What background information is relevant to Emzar's interview?
   b.   In the transcript of the interview, we look for a wide range of sensitive terms such as 'homosexual', 'LGBTQIA+', 'homophobic', etc.
   c.   We assess these terms in context. How significant are the potential privacy risks? Could publishing the interview without verification and consent lead to serious consequences for Emzar?

2. Assessment

   a.   A risk analysis is conducted on the identified sensitive terms. The potential risks are categorized visually.
   b.   We evaluate the risks and consider measures to mitigate them.

3. Content takes shape

Based on the risk level, we take appropriate actions. Our goal is to register, preserve, and/or disclose (make public) Emzar's interview in a responsible manner.

4. Learn lessons

Via an evaluation, we gain insights which make future risk analysis and decision-making easier. We ask ourselves many questions, as does the interviewee; in this case Emzar. How did he experience this risk analysis? Did it meet his expectations? And what does this process mean for us as a cultural heritage institution?

THE WORD SEARCH

What is the broad context of the data?

An interview never stands alone: it always has a context and a framework. To be able to fully dig out possible breaches of privacy, we have to look at that context. The preparation phase is ideal for this.

Among the questions we ask ourselves are:

WHO CONDUCTED THE INTERVIEW WITH EMZAR?

WHY WAS THIS INTERVIEW ORGANISED, AND WHO INITIATED IT?

WHAT WAS ITS PURPOSE?

IS THE CONTENT PRESERVED OR NOT?

DO THE PEOPLE INVOLVED KNOW EACH OTHER OR WAS THERE AN INTERMEDIARY?

Consent, the key to success

Once the context of the interview is clear, we start to look more broadly. We explore any form of unease experienced by the interviewee; in this case Emzar. If the interview touches on sensitive subjects and there are no clear agreements regarding the publication, publishing the content carries a risk.

An interview cannot simply be made public if certain factors come into play, such as:

THE INTERVIEWEE FELT UNCOMFORTABLE

THERE IS NO AGREEMENT REGARDING PUBLICATION OF THE CONTENT

THE SENSITIVE SUBJECTS MAKE ETHICAL PUBLICATION DIFFICULT

THERE IS A FEELING OF HESITATION AFTER THE INTERVIEW

Objective framework

Does this mean we can't make any sensitive content public? Not necessarily! Under strict conditions, the GDPR allows us to process certain types of data. In fact, this legislation provides a solid framework for doing so.

Using this objective framework, we assess whether an interview contains highly personal information, such as medical, criminal, biometric, ethnic, political, or religious data. Information about association memberships and sexual orientation must also be handled with care, in line with GDPR regulations. Emzar's interview contains extensive details about sexual orientation, politics, and activism.

SPECIAL CATEGORIES OF PERSONAL DATA
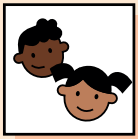
RACIAL OR ETHNIC DATA	**DATA ABOUT SEXUAL LIFE**	**BIOMETRIC DATA**	**MINORS**	**POLITICAL DATA**	**UNION-RELATED DATA**
PHILOSOPHICAL OR RELIGIOUS BELIEFS	**MEDICAL DATA**	**CRIMINAL DATA**	**MILITARY ACTIVITY**	**INSULT, SLANDER AND DEFAMATION**	

Additional screening for possible insults, slander, defamation, information about minors, or any form of discomfort is essential to prevent privacy issues.
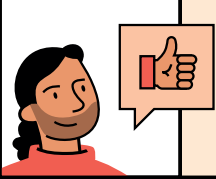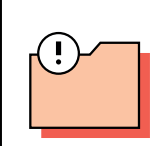
Processing the content literally

Clearly, we must process a vast amount of information to determine whether an interview violates privacy rights. And therein lies the challenge. Every single word of Emzar's conversation must be carefully reviewed. A time-consuming process, to say the least!

Fortunately, (automated) transcription tools help streamline this task by converting spoken words into searchable text files. These allow us to efficiently scan for sensitive personal data and other key terms. Additionally, supplementary documents, such as summaries or content sheets, can provide further insights into potentially sensitive content.

Sensitive = rejected?

Does Emzar's interview contain sensitive information? In this case, it certainly does. The key question is whether this sensitivity creates a privacy risk for the data subjects. As we examined earlier, the context of Emzar's interview plays a crucial role in ensuring GDPR compliance.

Because the risk analysis has a legal basis, at least one of the following three conditions must be met for processing sensitive content. As a museum, we aim to satisfy one of the first two:

THE DATA SUBJECTS GAVE THEIR EXPLICIT CONSENT (INSOFAR AS THIS WAS POSSIBLE). ?

THE DATA HAVE BEEN MADE PUBLIC BY THE DATA SUBJECTS. ?

THE PROCESSING OF THE CONTENT IS ESSENTIAL FOR ARCHIVING IN THE PUBLIC INTEREST, SCIENTIFIC OR HISTORICAL RESEARCH, OR FOR STATISTICAL PURPOSES. ?

Archiving for historical research

As a museum, our processing of personal data falls under the condition of 'archiving for historical research'. This makes it legally safe for us to process material without the consent of the data subjects. But that goes against our norms!
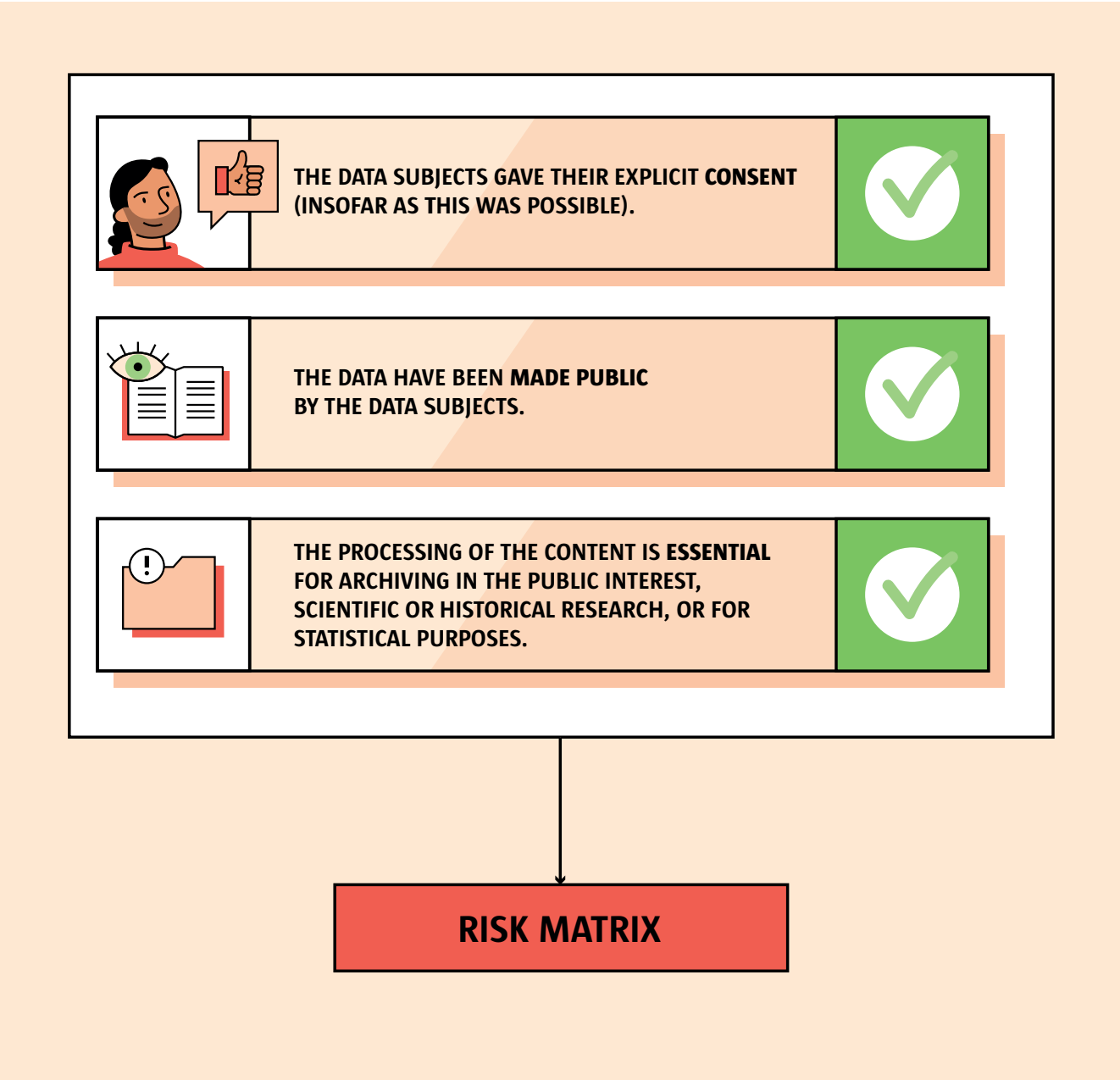
Since we place great importance on ethics, we prefer to obtain the consent of data subjects, which is often difficult to achieve. That's why this risk analysis serves as our ethical framework, and we require either the data subject's consent or data that they have made public themselves.

Ultimately, our goal is to respect Emzar and his privacy. In the next step of our process, we assess the different risk levels associated with the sensitive content.

ASSESSMENT

How high is the risk with regard to privacy questions?

Do we fully understand the broader context of Emzar's interview? Are we aware of the sensitive terms involved? Is there a clear agreement on the disclosure of its content? If so, it is time to assess the potential risks to Emzar's rights and freedoms, as well as those of other data subjects. For this, we use a structured approach: a risk matrix.

THE DATA SUBJECTS GAVE THEIR EXPLICIT **CONSENT** (INSOFAR AS THIS WAS POSSIBLE).

THE DATA HAVE BEEN **MADE PUBLIC** BY THE DATA SUBJECTS.

THE PROCESSING OF THE CONTENT IS **ESSENTIAL** FOR ARCHIVING IN THE PUBLIC INTEREST, SCIENTIFIC OR HISTORICAL RESEARCH, OR FOR STATISTICAL PURPOSES.

RISK MATRIX

Risk matrix

A risk matrix allows us to measure, categorize, and visualize risks effectively. Each risk is assessed based on two key factors:

- the probability of the risk
- the impact thereof

By combining these two factors, we assign a risk score: the higher each factor, the greater the risk of adverse consequences for the rights and freedoms of the data subjects.

IMPACT

	HIGHLY UNLIKELY (1)	UNLIKELY (2)	POSSIBLE (3)	PROBABLE (4)	VERY PROBABLE (5)
5 CATASTROPHIC	5 LOW	10 MODERATE	15 HIGH	20 HIGH	25 VERY HIGH
4 LARGE	4 LOW	8 MODERATE	12 MODERATE	16 HIGH	20 HIGH
3 SERIOUS	3 LOW	6 MODERATE	9 MODERATE	12 MODERATE	15 HIGH
2 MODERATE	2 LOW	4 LOW	6 MODERATE	8 MODERATE	10 MODERATE
1 SMALL	1 LOW	2 LOW	3 LOW	4 LOW	5 LOW

PROBABILITY

In the matrix, 'impact' and 'probability' have their own scale. An impact on someone's privacy ranges from value 1 (small) to value 5 (catastrophic). The probability of such a risk occurring ranges from value 1 (highly unlikely) to value 5 (very likely). This method allows us to quickly determine the severity of each risk: from 'low' and 'moderate' to 'high' and 'very high'.
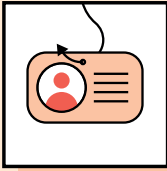
Concrete risks

But what exactly constitutes a 'risk'? Article 75 of the GDPR defines this in precise terms: it concerns risks to the rights and freedoms of individuals that may result in:

OVERVIEW OF DIFFERENT RISKS

**DISCRIMINATION
OR EXCLUSION**

**IDENTITY THEFT
OR FRAUD**

**FINANCIAL
PROBLEMS**

**REPUTATIONAL
DAMAGE**

**PUBLIC DISCLOSURE
OF CONFIDENTIAL
PERSONAL DATA**

NAAM

**THE IDENTIFICATION
OF ANONYMOUS PERSONS**

**ANY SIGNIFICANT FINANCIAL
OR SOCIAL DISADVANTAGE**

All these risks are classified under one of these five categories, namely **harm** caused by:

CATEGORIES CONTENT MATRIX

1

**SENSITIVE PERSONAL
DATA**
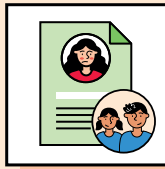
2

**MENTION IN
SENSITIVE CONTEXT**

3

**CONFIDENTIAL INFO
THAT HAD TO
REMAIN SECRET**

4

**SENSITIVE PERSONAL
DATA AFFECTING THE
IMMEDIATE FAMILY**

5

**MENTION IN SENSITIVE
CONTEXT THAT
DISADVANTAGES
THE IMMEDIATE FAMILY**

Data subjects

The data subjects, who may face privacy risks when the interview becomes public, in Emzar's case, are:

**THE INTERVIEWEE:
EMZAR HIMSELF**

**THIRD PARTIES
MENTIONED BY EMZAR**
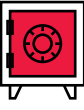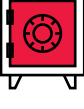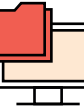
**IMMEDIATE FAMILY
OF EMZAR**
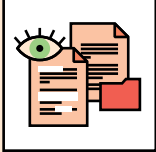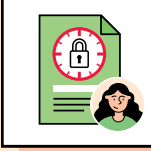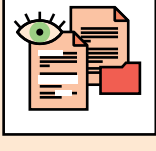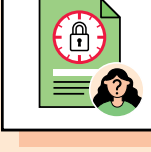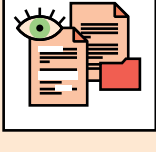
Table: basic risks
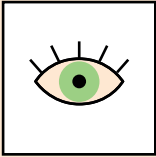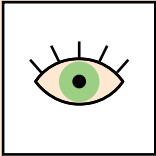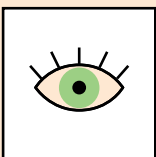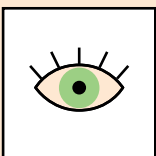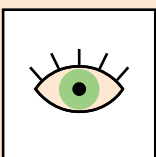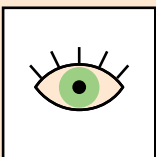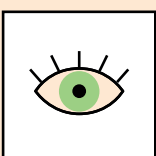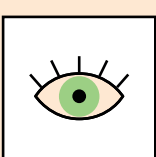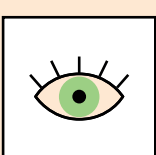
In the table below, we outline the basic risks and specify the appropriate action for each risk level.

You can read all about the actions associated with each risk level in Chapter 5 ('Content takes shape').

RISK

Content	Risk	Action
THE CONTENT CONTAINS SENSITIVE PERSONAL DATA OF THE DONOR, SUCH AS ADDRESS, SEXUAL ORIENTATION, POLITICAL AFFILIATION, MEDICAL INFO OR MORE.	**25** VERY HIGH	
THE DONOR IS MENTIONED IN SENSITIVE CONTEXTS, SUCH AS ADULTERY, VIOLENCE OR CRIME.	**25** VERY HIGH	
THE STORY CONTAINS CONFIDENTIAL (POSSIBLY PROFESSIONAL) INFORMATION THAT DISADVANTAGES THE DONOR AND IS NOT YET TIME-BARRED.	**25** VERY HIGH	

RISK

Content	Risk	Action
SENSITIVE PERSONAL DATA (SUCH AS STRICTLY PERSONAL INFORMATION) CAUSE HARM TO FAMILY MEMBERS.	**20** HIGH	
FAMILY MEMBERS ARE MENTIONED IN A SENSITIVE CONTEXT (SUCH AS ADULTERY, VIOLENCE, CRIME, ETC.).	**20** HIGH	
THE CONTENT CONTAINS PERSONAL DATA OF IDENTIFIABLE DATA SUBJECTS, SUCH AS ADDRESS, ORIENTATION, POLITICAL AFFILIATION, ETC.	**16** HIGH	
FAMILY MEMBERS EXPERIENCE HARM THROUGH CONFIDENTIAL (POSSIBLY PROFESSIONAL) INFORMATION THAT IS NOT YET TIME-BARRED.	**16** HIGH	

RISK

IDENTIFIABLE DATA SUBJECTS ARE MENTIONED IN SENSITIVE CONTEXTS (SUCH AS ADULTERY, VIOLENCE, CRIME, ETC.).	**12** MODERATE	→
IDENTIFIABLE DATA SUBJECTS EXPERIENCE HARM DUE TO CONFIDENTIAL (POSSIBLY PROFESSIONAL) INFORMATION THAT IS NOT YET TIME-BARRED.	**12** MODERATE	→
FAMILY MEMBERS EXPERIENCE HARM DUE TO CONFIDENTIAL (POSSIBLY PROFESSIONAL) INFORMATION THAT IS NOW TIME-BARRED.	**12** MODERATE	→
THE DATA SUBJECTS ARE POTENTIALLY IDENTIFIABLE AND THE CONTENT CONTAINS THEIR PERSONAL DATA, SUCH AS ADDRESS, SEXUAL ORIENTATION, POLITICAL AFFILIATION, ETC.	**9** MODERATE	→
IDENTIFIABLE DATA SUBJECTS EXPERIENCE HARM DUE TO CONFIDENTIAL (POSSIBLY PROFESSIONAL) INFORMATION THAT IS NOW TIME-BARRED.	**9** MODERATE	→
THE DATA SUBJECTS MAY BE IDENTIFIABLE AND EXPERIENCE HARM FROM CONFIDENTIAL (POSSIBLY PROFESSIONAL) INFORMATION THAT IS NOT YET TIME-BARRED.	**9** MODERATE	→
THE CONTENT CONTAINS PERSONAL DATA OF IDENTIFIABLE DECEASED PERSONS, SUCH AS ADDRESS, SEXUAL ORIENTATION, POLITICAL AFFILIATION, ETC.	**9** MODERATE	→

RISK

		RISK	
	THE DATA SUBJECTS MAY BE IDENTIFIABLE AND EXPERIENCE HARM DUE TO CONFIDENTIAL (POSSIBLY PROFESSIONAL) INFORMATION THAT IS NOW TIME-BARRED.	4 LOW	
	THE DATA SUBJECTS MAY BE IDENTIFIABLE AND MENTIONED IN SENSITIVE CONTEXTS (SUCH AS ADULTERY, VIOLENCE, CRIME, ETC.).	4 LOW	
	IDENTIFIABLE DECEASED PERSONS EXPERIENCE HARM DUE TO CONFIDENTIAL (POSSIBLY PROFESSIONAL) INFORMATION THAT IS NOT YET TIME-BARRED.	4 LOW	
	IDENTIFIABLE DECEASED PERSONS ARE MENTIONED IN SENSITIVE CONTEXTS (SUCH AS ADULTERY, VIOLENCE, CRIME, ETC.).	3 LOW	
	THE CONTENT CONTAINS PERSONAL DATA OF UNIDENTIFIABLE DATA SUBJECTS, SUCH AS ADDRESS, ORIENTATION, POLITICAL AFFILIATION, ETC.	1 LOW	
	UNIDENTIFIABLE DATA SUBJECTS ARE MENTIONED IN SENSITIVE CONTEXTS (SUCH AS ADULTERY, VIOLENCE, CRIME, ETC.).	1 LOW	
	UNIDENTIFIABLE DATA SUBJECTS EXPERIENCE HARM DUE TO CONFIDENTIAL (POSSIBLY PROFESSIONAL) INFORMATION THAT IS NOT YET TIME-BARRED.	1 LOW	
	UNIDENTIFIABLE DATA SUBJECTS EXPERIENCE HARM DUE TO CONFIDENTIAL (POSSIBLY PROFESSIONAL) INFORMATION THAT IS ALREADY TIME-BARRED.	1 LOW	
	IDENTIFIABLE DECEASED PERSONS EXPERIENCE HARM DUE TO CONFIDENTIAL (POSSIBLY PROFESSIONAL) INFORMATION THAT IS ALREADY TIME-BARRED.	1 LOW	

Without risk matrix

Do we always need to use a full risk matrix? Not necessarily. A quicker tool is the table below. We first calculate the risk level.
A description of the risk and a recommendation about the best method of disclosure helps us in making the correct decision.

VERY HIGH RISK

DATA ABOUT:
- THE DONOR
- IDENTIFIABLE, LIVING THIRD PARTIES

CONTAINS CONFIDENTIAL INFO

PROBABILITY OF DAMAGE FOR:
- THE DONOR
- DIRECT FAMILY
- THIRD PARTIES

KEPT IN A CLOSED PRIVATE ENVIRONMENT

HIGH RISK

DATA ABOUT:
- THE DONOR
- IDENTIFIABLE, LIVING THIRD PARTIES

CONTAINS CONFIDENTIAL INFO

PROBABILITY OF DAMAGE FOR:
- THE DONOR
- DIRECT FAMILY
- THIRD PARTIES

ONLY CONSULTABLE ON REQUEST VIA THE BACK OFFICE

MODERATE RISK

DATA ABOUT:
- POTENTIALLY IDENTIFIABLE LIVING THIRD PARTIES

CONTAINS CONFIDENTIAL INFO

MODERATE PROBABILITY OF DAMAGE FOR:
- THIRD PARTIES

ONLY PARTIALLY MAKE PUBLIC

LOW RISK

SENSITIVE PERSONAL DATA ABOUT DECEASED PERSONS / (POTENTIALLY) UNIDENTIFIABLE THIRD PARTIES

SENSITIVE PERSONAL DATA ABOUT POTENTIALLY IDENTIFIABLE THIRD PARTIES

SMALL PROBABILITY OF DAMAGE FOR:
- THIRD PARTIES

MAKE PUBLIC BOTH ONLINE AND OFFLINE

CONTENT TAKES SHAPE

How public do we make the content?

Once the risk level is determined, the next step is to implement concrete measures for disclosure. This includes decisions on how best to register, preserve, and/or disclose interviews and stories within our collection management system and across public platforms.

We register interviews from the Red Star Line Museum collection in our collection management system. In this system, we record usage restrictions in the 'Special requirements' and 'Confidentiality details' fields. These fields are filled in when the risk level reaches 'moderate' or higher, taking into account the access that colleagues from Antwerp city museums and heritage institutions have via the city's image database.

There are four levels of risk with regard to privacy questions and there are three ways in which these interviews can be made public:

RISK METER

- VERY HIGH
- HIGH
- MODERATE
- ► LOW

METHODS OF DISCLOSURE

THE INTERVIEW IS VISIBLE (BUT NOT DOWNLOADABLE) FOR ANY INTERNET USER.

THE INTERVIEW CAN ONLY BE CONSULTED VIA THE BACK OFFICE. THIS RESTRICTS ACCESS ONLY TO ALL USERS OF THE CITY IMAGE DATABASE, EXTERNAL RESEARCHERS AND STAFF MEMBERS OF THE RED STAR LINE MUSEUM.

THE INTERVIEW IS KEPT SECURELY IN A CLOSED PRIVATE ENVIRONMENT. ONLY STAFF MEMBERS OF THE RED STAR LINE MUSEUM HAVE ACCESS.

Decision-making

In order to decide how we preserve and disclose these interviews, we simply follow the four risk levels.

STORIES WITH A LOW RISK LEVEL ARE MADE PUBLIC, BOTH ONLINE AND OFFLINE (TYPE A).
The viewer gets to see all the accompanying metadata and personal and other information. In the city image database, the interviews are visible but cannot be downloaded and are accompanied by clear information regarding rights as indicated below:

'The work and/or media file are subject to copyright and/or other restrictions. You may not copy and use the Work and/or the media file without the consent of the rights holder(s).'

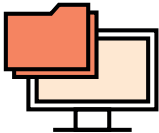**WHERE THERE IS A MODERATE RISK LEVEL, WE MAKE ONLY FRAGMENTS OF THE DATA PUBLICLY AVAILABLE (TYPE B).**
We store the original interview in the back office, accessible only to people with an account with the city image database. External users can consult it only upon request and under specific conditions. The rights notice in the system states:

'The media file is intended only for preservation or documentation and is therefore only visible to users of the city image database. The Work and/or the media file may also be subject to copyright. External users who wish to use the Work must first contact the managing institution.'

WE KEEP STORIES WITH A HIGH RISK LEVEL ONLY IN THE BACK OFFICE, WHERE THEY CAN ONLY BE ACCESSED ON REQUEST AND UNDER STRICT CONDITIONS (TYPE B).

WE DO NOT MAKE VERY HIGH RISK LEVEL STORIES PUBLIC. WE KEEP THEM IN A CLOSED ENVIRONMENT TO WHICH ONLY EMPLOYEES OF THE RED STAR LINE MUSEUM HAVE ACCESS (TYPE C).

Data retention expiration

If a risk level is classified as moderate, we refrain from making the full story publicly available online for the time being. However, privacy considerations, much like copyrights, can become time-barred. What happens after many years? Eventually, all of Emzar's data may be disclosed if the need arises. If the data is no longer relevant, it must be erased or anonymized.

Thus, full public disclosure of the interview remains a possibility, provided it aligns with the GDPR.

For full disclosure, choose a time according to this decision tree:

WAS THE PERSON POSSIBLY A CHILD (<16 YEARS OLD)?

WAS THE CHILD IN EDUCATION AT THE TIME?

WAS THE PERSON AN ADULT?

DISCLOSE THE FULL STORY **95 YEARS** AFTER THE INTERVIEW.

DISCLOSE THE FULL STORY **100 YEARS** AFTER THE INTERVIEW.

DISCLOSE THE FULL STORY **85 YEARS** AFTER THE INTERVIEW.

WAS THE PERSON 60 YEARS OR OLDER?

DISCLOSE THE FULL STORY **40 YEARS** AFTER THE INTERVIEW.

DO PORTRAIT RIGHTS APPLY?

ADD **20 YEARS** TO THE DISCLOSURE YEAR

Does Emzar's story feature multiple identifiable third parties (friends, acquaintances, fellow activists) whose rights and freedoms could be at risk? If so, we use the youngest identifiable third party as the reference point in our decision tree.

Our museum assumes a maximum lifespan of 100 years. Once a person has passed away, GDPR no longer applies to their data, altering the risk assessment. However, ethical considerations remain. If the person appears in visual materials, portrait rights must also be taken into account.

LEARN LESSONS

Even though every risk analysis can undergo the same pattern of context determination, screening for sensitivities and risk assessment, the final decisions vary in each case.

High risk, yet public

In Emzar's case, the privacy risks were significant, with potential infringements on rights and freedoms. Yet, the decisive factor was the donor's intent. Emzar considered it essential to publicly share his reality as an LGBTQIA+ activist in Georgia. Speaking out empowered him, boosted his self-confidence, and reinforced his determination to persist as an activist.

Deciding means dialogue

What if the risk matrix does not provide a clear answer? Or if the process lacks transparency? In such cases, we carefully document our decision-making process to ensure consistency and to inform both current and future colleagues.

Additionally, we engage in open discussions with the donor. In Emzar's case, we took the time to reflect on his concerns and the challenges he encountered throughout the process. We also examined our own role: how could we improve our approach in similar cases? Finally, we considered the consequences of sharing the content, not only for Emzar but also for his loved ones.

Each story is equally unique

As a heritage institution, we treat every story with equal care and attention. The processing of oral history is influenced by numerous factors, both positive and negative. That is why acting in good faith and with integrity is always our guiding principle — just as it was in Emzar's case.

The Red Star Line Museum aims to create a safe environment as a trusted confidant. In doing so, we ensure fair interaction and careful exchange of information, valuing both heritage and the people behind the stories. This enables us to find witnesses with compelling stories and share them in an ethical manner, with respect for all those involved.

COLOPHON