

Warden Privacy Policy

This Privacy Policy explains how **Warden** (“Warden”, “we”, “us”, “our”) collects, uses, and retains personal data in connection with its products and services (the “**Services**”). It applies to individuals who use the Services (“**Users**”) as well as individuals whose data may be processed through the operation of the Services.

Warden is committed to protecting personal data and ensuring transparency in accordance with the General Data Protection Regulation (GDPR).

1. Data Controller Information

For the purposes of the GDPR, **Warden acts as the data controller** for the personal data described in this Privacy Policy.

Controller Name: Warden

Contact Email: kline@vwarden.org

Primary Contact Method: Warden Discord - <https://discord.com/invite/MVNZR73Ghf>

2. Categories of Data Collected

The amount and type of data collected depends on the purpose of processing. Warden does not sell personal data. Data is never transmitted to outside parties except in anonymized form (e.g., aggregated statistics).

Warden processes the following categories of data:

- Blacklist Data
- Usage Data

3. Blacklist Data

3.1 Purpose of Processing

Blacklist Data is processed to maintain the safety and integrity of communities using the Services, specifically in relation to intellectual property theft and video game cheating within the CitizenFX platform ecosystem.

Data may be provided by:

- Warden Contributors
- Warden Staff

This data may be collected without prior notice to the individual concerned where necessary for moderation and community protection purposes.

3.2 Categories of Blacklist Data

Blacklist Data may include:

- **Discord User ID** (“**UserID**”)
- **Guild ID and Guild Name** of the server in which the User was identified (“**Guild Information**”)
- **Roles** assigned to the User within that Guild

3.3 Data Retention

- The **UserID** is retained for identification purposes and future enforcement of blacklist measures.
- The data is not actively kept up to date and is only updated if re-collected.
- Guild Information and Roles are retained to allow affected individuals to submit appeals and to inform them of the context in which they were blacklisted.

4. Legal Basis for Processing (Article 6 GDPR)

Warden processes Blacklist Data under **Article 6(1)(f) GDPR — Legitimate Interests**.

The legitimate interest pursued is maintaining the safety, integrity, and trustworthiness of Discord communities using the Services. Warden protects over 8000 Discord guilds through centralized moderation, blacklist enforcement, and anti-abuse systems.

Warden moderation is entirely configurable by Discord Guild owners/operators and requires being added and configured by the guild owner/operator before functioning. Guild owners/operators inherently opt-in and configure Warden moderation functions.

5. Legitimate Interest Assessment

Purpose Test

The purpose of processing is to protect communities from users involved in disruptive or malicious activities, including cheating, leaking, or reselling intellectual property.

Necessity Test

The Discord User ID is the only reliable and persistent identifier for enforcing blacklist measures. Usernames or other identifiers are insufficient due to their ability to be changed.

Balancing Test

Warden limits processing to minimal and non-sensitive data:

- The UserID is publicly accessible through the Discord API and available to anyone who comes into contact with or shares a space with the User.
- No private messages, IP addresses, or sensitive personal data are stored.
- Data is not used for marketing or profiling.
- Access is restricted to Warden Staff for moderation and appeal handling only.

Warden believes that the legitimate interest in protecting thousands of communities is not overridden by the individual's privacy rights, given the limited and proportionate scope of processing.

6. Right to Erasure (Article 17 GDPR)

Under **Article 17(3)(b) GDPR**, the right to erasure does not apply where processing is necessary for:

- The establishment, exercise, or defence of legal claims; or
- Protecting the rights and freedoms of others (including the communities safeguarded by Warden).

Requests for deletion may therefore be denied where a User has been reliably associated with conduct that threatens community integrity or safety.

All requests will be assessed on a case-by-case basis.

7. Usage Data

7.1 Purpose of Processing

Warden collects Usage Data to:

- Prevent abuse of the Services
- Log and resolve errors
- Confirm functionality
- Improve and develop the Services
- Generate anonymized usage metrics

7.2 Categories of Usage Data

This may include:

- Identifying information about Guilds using the Services

- Information about Users directly interacting with the Services
- Aggregated or anonymized service metrics

Non-anonymized Usage Data is not shared outside of Warden Staff or the Services infrastructure.

8. Data Sharing

Warden does not sell personal data.

Personal data is not shared with third parties except:

- Where required by law
- Where necessary to protect legal rights
- In anonymized and aggregated form for statistical purposes

9. Data Subject Rights Under GDPR

Individuals located in the European Economic Area (EEA) have the right to:

- Access their personal data
- Request rectification
- Request erasure (subject to legal limitations)
- Restrict processing
- Object to processing under Article 6(1)(f)
- Lodge a complaint with a supervisory authority

Requests can be submitted to the data controller contact above.

Versioning

This document was last updated May 4th 2026 and is version 4.