

P3P

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8-533 / 8-733 / 19-608 / 95-818:
Privacy Policy, Law, and Technology

**Carnegie
Mellon
University**

CyLab



Engineering &
Public Policy



Today's agenda

- Quiz
- Questions/comments about the readings
- P3P

By the end of class you will be able to:

- Understand the history of P3P and the motivation for its development and adoption
- Understand the major components of P3P
- Understand how web sites are circumventing P3P to avoid IE cookie blocking
- Understand how to read a W3C specification

Original Idea behind P3P

- A framework for automated privacy discussions
 - Web sites disclose their privacy practices in standard machine-readable formats
 - Web browsers automatically retrieve P3P privacy policies and compare them to users' privacy preferences
 - Sites and browsers can then negotiate about privacy terms

P3P history

- Idea discussed at November 1995 FTC meeting
- Ad Hoc “Internet Privacy Working Group” convened to discuss the idea in Fall 1996
- W3C began working on P3P in Summer 1997
 - Several working groups chartered with dozens of participants from industry, non-profits, academia, government
 - Numerous public working drafts issued, and feedback resulted in many changes
 - Early ideas about negotiation and agreement ultimately removed
 - Automatic data transfer added and then removed
 - Patent issue stalled progress, but ultimately became non-issue
- P3P issued as official W3C Recommendation on April 16, 2002
 - <http://www.w3.org/TR/P3P/>

P3P1.0 – A first step

- Offers an easy way for web sites to communicate about their privacy policies in a standard machine-readable format
 - Can be deployed using existing web servers
- This will enable the development of tools that:
 - Provide snapshots of sites' policies
 - Compare policies with user preferences
 - Alert and advise the user

P3P is part of the solution

- P3P1.0 helps users understand privacy policies but is not a complete solution
- Seal programs and regulations
 - help ensure that sites comply with their policies
- Anonymity tools
 - reduce the amount of information revealed while browsing
- Encryption tools
 - secure data in transit and storage
- Laws and codes of practice
 - provide a base line level for acceptable policies

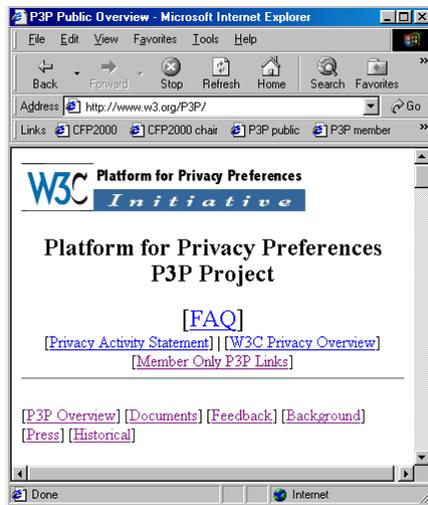
The basics

- P3P provides a standard XML format that web sites use to encode their privacy policies
- Sites also provide XML “policy reference files” to indicate which policy applies to which part of the site
- Sites can optionally provide a “compact policy” by configuring their servers to issue a special P3P header when cookies are set
- No special server software required
- User software to read P3P policies called a “P3P user agent”

P3P1.0 Spec Defines

- A standard vocabulary for describing set of uses, recipients, data categories, and other privacy disclosures
- A standard schema for data a Web site may wish to collect (base data schema)
- An XML format for expressing a privacy policy in a machine readable way
- A means of associating privacy policies with Web pages or sites
- A protocol for transporting P3P policies over HTTP

A simple HTTP transaction

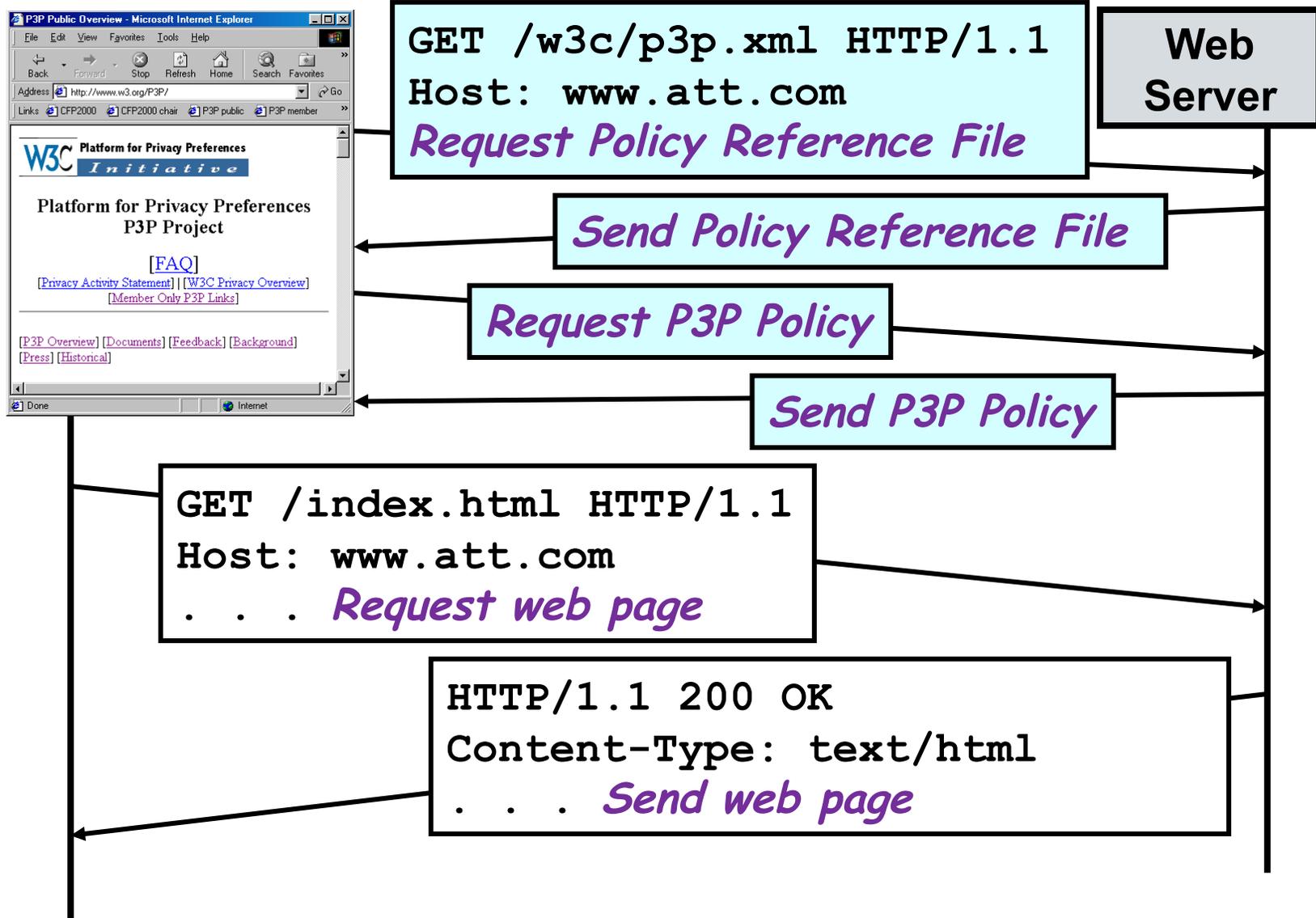


GET /index.html HTTP/1.1
Host: www.att.com
. . . *Request web page*

HTTP/1.1 200 OK
Content-Type: text/html
. . . *Send web page*

Web
Server

... with P3P 1.0 added



Transparency

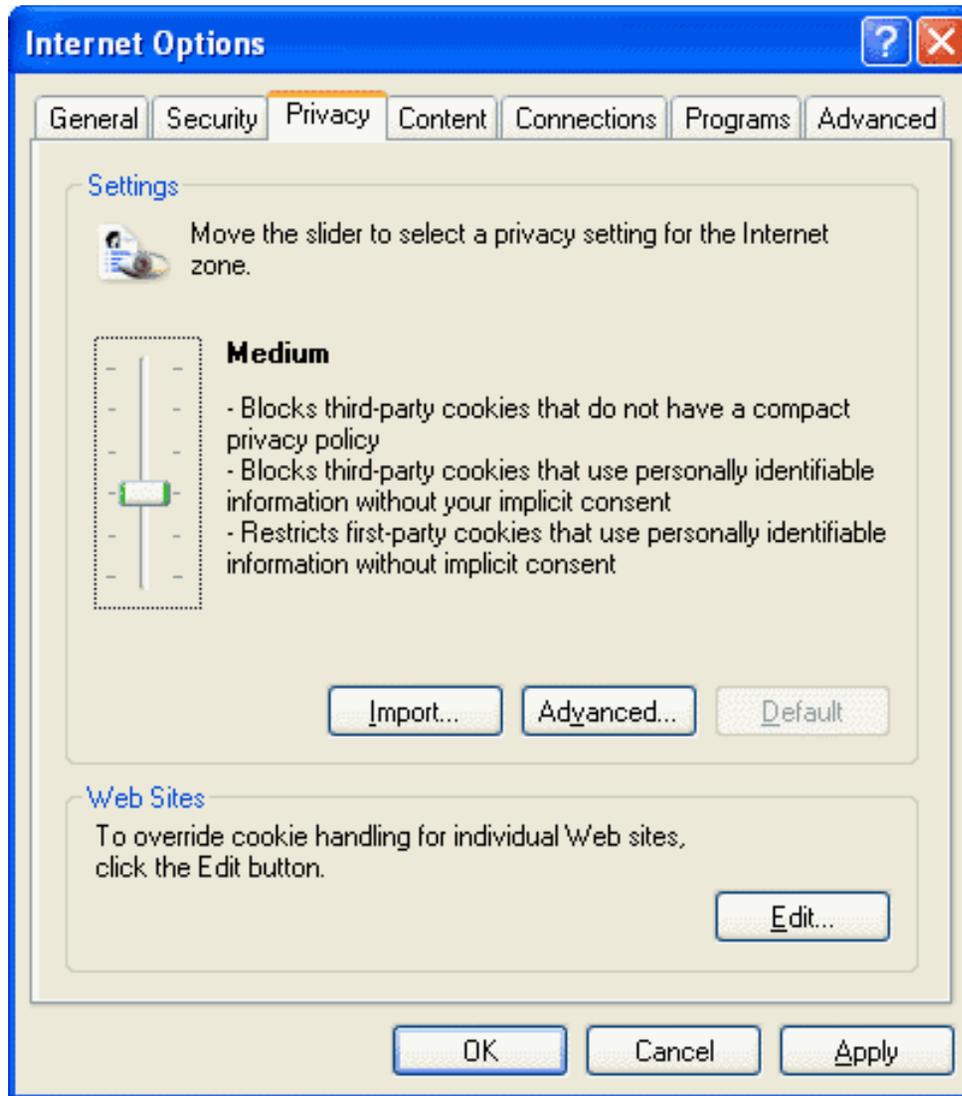
- P3P clients can check a privacy policy each time it changes
- P3P clients can check privacy policies on all objects in a web page, including ads and invisible images

<http://www.att.com/accessatt/>



<http://adforce.imgis.com/?adlink|2|68523|1|146|ADFORCE>

P3P in IE6



Automatic processing of compact policies only;
third-party cookies without compact policies blocked by default



Privacy icon on status bar indicates that a cookie has been blocked - pop-up appears the first time the privacy icon appears



GigaLaw.com: Legal Information for Internet Professionals - Microsoft Internet Explorer

File Edit View Favorites Tools Help

Back Forward Stop Refresh Home Favorites Media History Print

Address <http://www.gigalaw.com/>

Links [P3P Public](#) [P3P Spec](#) [Google](#) [AT&T](#) [AT&T VCS](#) [AT&T WN](#) [CDT](#)

New & Noteworthy:

[Analyzing the Supreme Court's Opinion on the Child Online Protection Act](#)

Crime
[Hacking and Viruses, Terrorism Privacy, Computer Fraud and Abuse Act, Insurance](#)

Methods

Politics
[Voting, Government, Di](#)

Databases

Disabilities

Privacy
[Basics, Protection, Priv Regulation, Free Speech](#)

Privacy Report

Based on your privacy settings, some cookies were restricted or blocked.

Show:

Web sites with content on the current page:

Site	Cookies
http://rcm.amazon.com/e/cm?t=gigalawcom&l=st1&...	Blocked
http://rcm-images.amazon.com/images/P/00286422...	Blocked
http://rcm-images.amazon.com/images/G/01/rcm/1...	Blocked

To view a site's privacy summary, select an item in the list, and then click Summary.

[Learn more about privacy...](#)

Summary Settings... Close

[The Complete Idiot's Guide](#)
Richard C. Levy
Only \$13.97!

[Patent Strategy for Researchers and...](#)
H. Jackson Knight

[Getting Permission](#)
Richard Stim

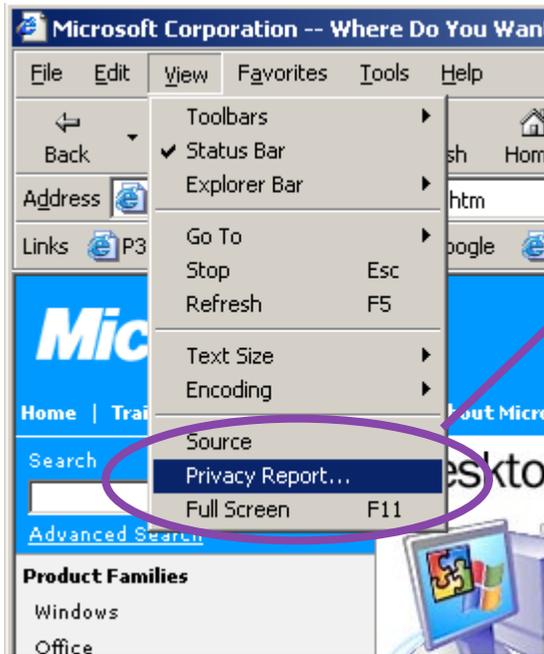
[Will It Sell? How to Determine If Yo...](#)
James E. White

[Digital Copyright](#)
Jessica Litman

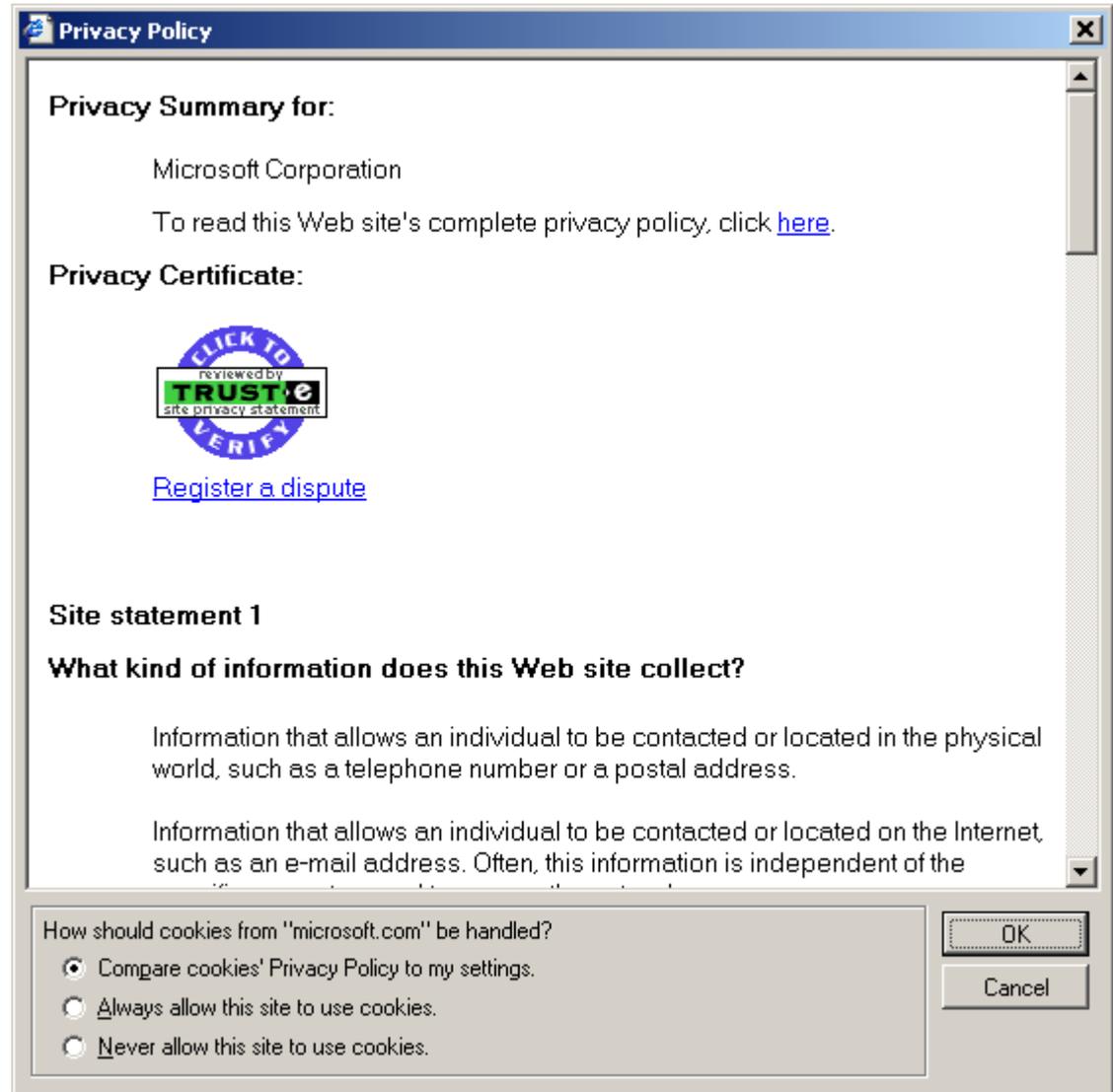
[Intellectual Property](#)

Internet

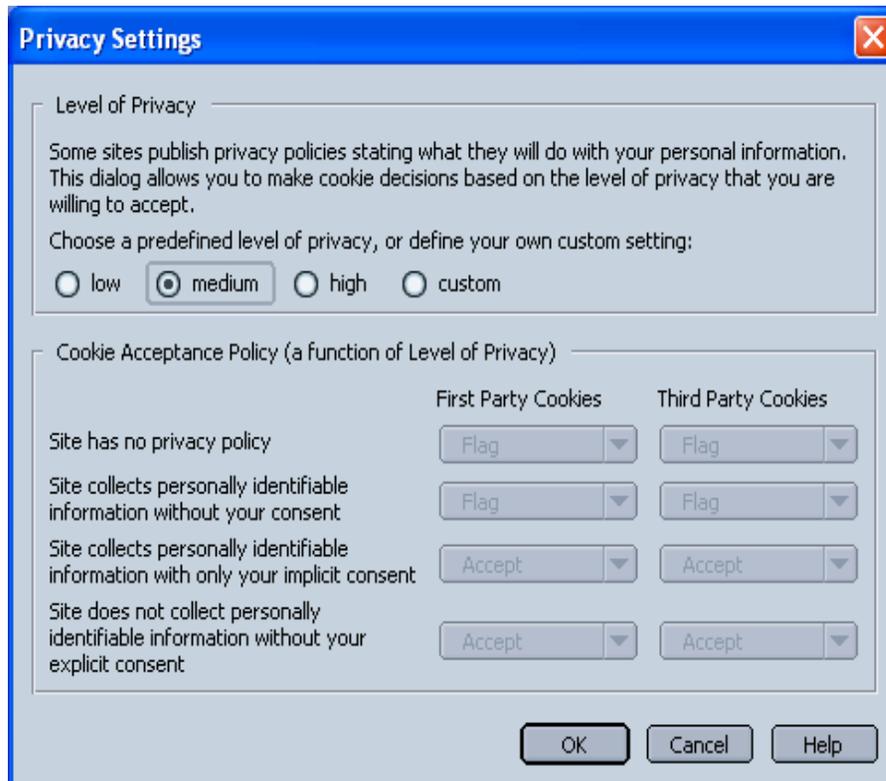
Users can click on privacy icon for list of cookies; privacy summaries are available at sites that are P3P-enabled



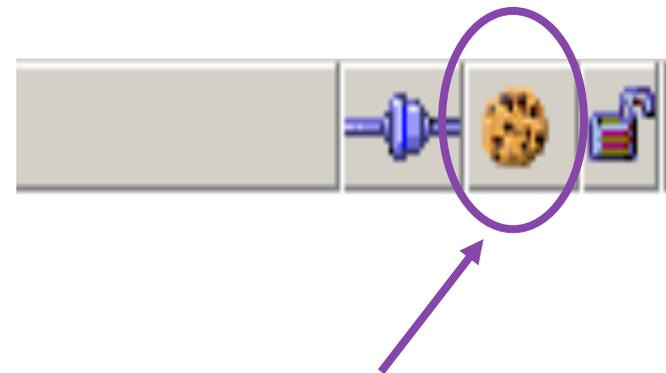
Privacy summary report is generated automatically from full P3P policy



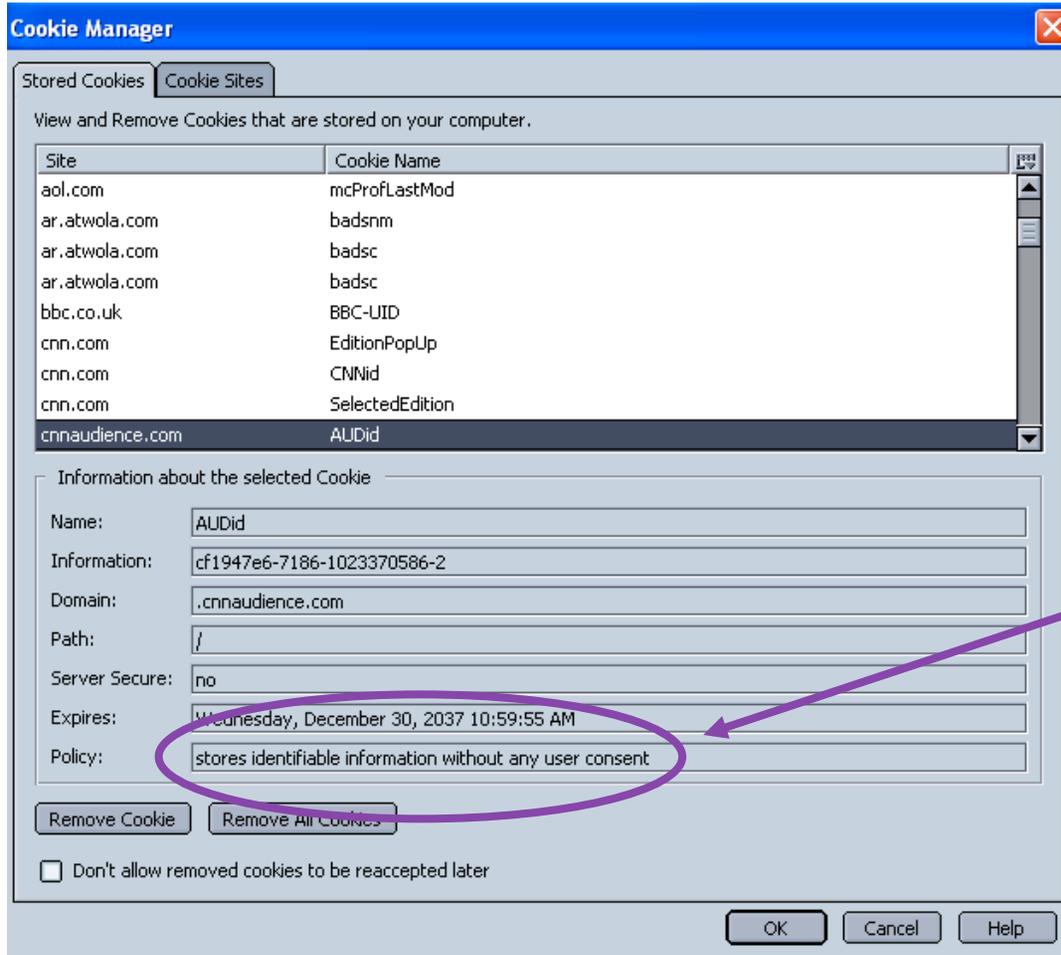
P3P in Netscape 7



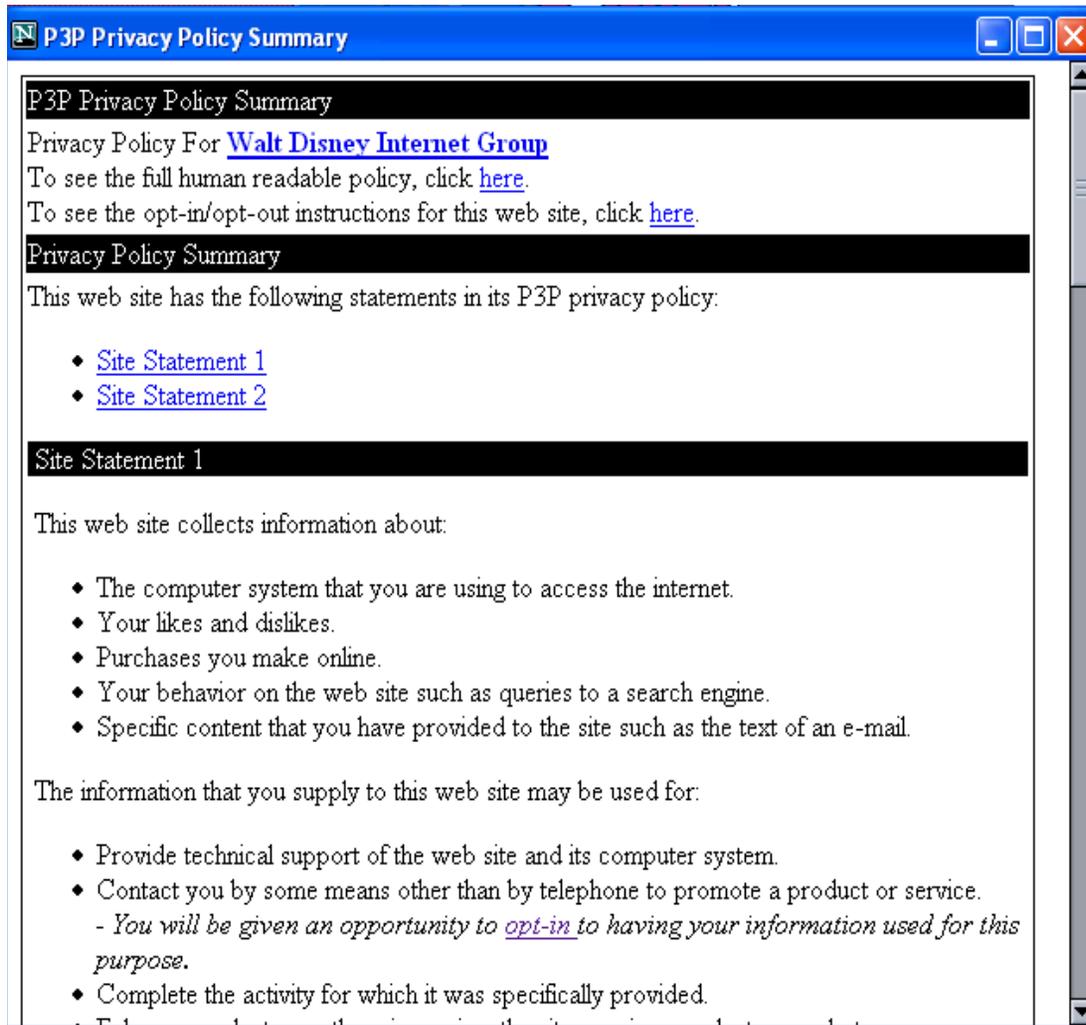
Preview version similar to IE6, focusing, on cookies; cookies without compact policies (both first-party and third-party) are “flagged” rather than blocked by default



Indicates flagged cookie



Users can view English translation of (part of) compact policy in Cookie Manager



A policy summary can be generated automatically from full P3P policy

What's in a P3P policy?

- Name and contact information for site
- The kind of access provided
- Mechanisms for resolving privacy disputes
- The kinds of data collected
- How collected data is used, and whether individuals can opt-in or opt-out of any of these uses
- Whether/when data may be shared and whether there is opt-in or opt-out
- Data retention policy

Why web sites adopt P3P

- Demonstrate corporate leadership on privacy issues
 - Show customers they respect their privacy
 - Demonstrate to regulators that industry is taking voluntary steps to address consumer privacy concerns
- Distinguish brand as privacy friendly
- Prevent IE6 from blocking their cookies
- Anticipation that consumers will soon come to expect P3P on all web sites
- Individuals who run sites value personal privacy

P3P early adopters

- News and information sites – CNET, About.com, BusinessWeek
- Search engines – Yahoo, Lycos
- Ad networks – DoubleClick, Avenue A
- Telecom companies – AT&T
- Financial institutions – Fidelity
- Computer hardware and software vendors – IBM, Dell, Microsoft, McAfee
- Retail stores – Fortunoff, Ritz Camera
- Government agencies – FTC, Dept. of Commerce, Ontario Information and Privacy Commissioner
- Non-profits - CDT

Web site adoption of P3P

- AT&T study surveyed 5,856 websites in 2003, found 538 P3P policies
 - Adoption highest among popular websites (~30% of top 100 sites)
 - Web site adoption increasing slowly, but steadily
 - Low adoption for government sites – but changed with new regulations
- Large number of P3P policies contain technical errors
 - Most errors due to old version of P3P spec or minor technical issues
 - 7% have severe errors such as missing required components

Byers, S., Cranor, L. F., and Kormann, D. 2003. Automated analysis of P3P-enabled Web sites. ICEC '03, vol. 50. ACM Press, New York, NY, 326-338. DOI=<http://doi.acm.org/10.1145/948005.948048>

Legal issues

- P3P specification does not address legal standing of P3P policies or include enforcement mechanisms
- P3P specification requires P3P policies to be consistent with natural-language privacy policies
 - P3P policies and natural-language policies are not required to contain same level of detail
 - Typically natural-language policies contain more detailed explanations
- In some jurisdictions, regulators and courts may treat P3P policies equivalently to natural language privacy policies
- The same attorneys and policy makers involved in drafting natural-language policy should help create P3P policy

Privacy policy

Designed to be read by a human

Can contain fuzzy language with “wobble room”

Can include as much or as little information as a site wants

Easy to provide detailed explanations

Sometimes difficult for users to determine boundaries of what it applies to and when it might change

Web site controls presentation

P3P policy

Designed to be read by a computer

Mostly multiple choice – sites must place themselves in one “bucket” or another

Must include disclosures in every required area

Limited ability to provide detailed explanations

Precisely scoped

User agent controls presentation

P3P Interface design challenges

- P3P 1.0 specification focuses on interoperability, says little about user interface
 - P3P 1.1 spec will provide explanations of P3P vocabulary elements suitable for display to end users
- P3P user agents typically need user interfaces for:
 - informing users about web site privacy policies
 - configuring the agent to take actions on the basis of a user's privacy preferences

Informing users about privacy is difficult

- Privacy policies are complex
 - Over 36K combinations of P3P “multiple choice” elements
- Users are generally unfamiliar with much of the terminology used by privacy experts
- Users generally do not understand the implications of data practices
- Users are not interested in all of the detail of most privacy policies
- Which details and the level of detail each user is interested in varies

Specifying privacy preferences is difficult

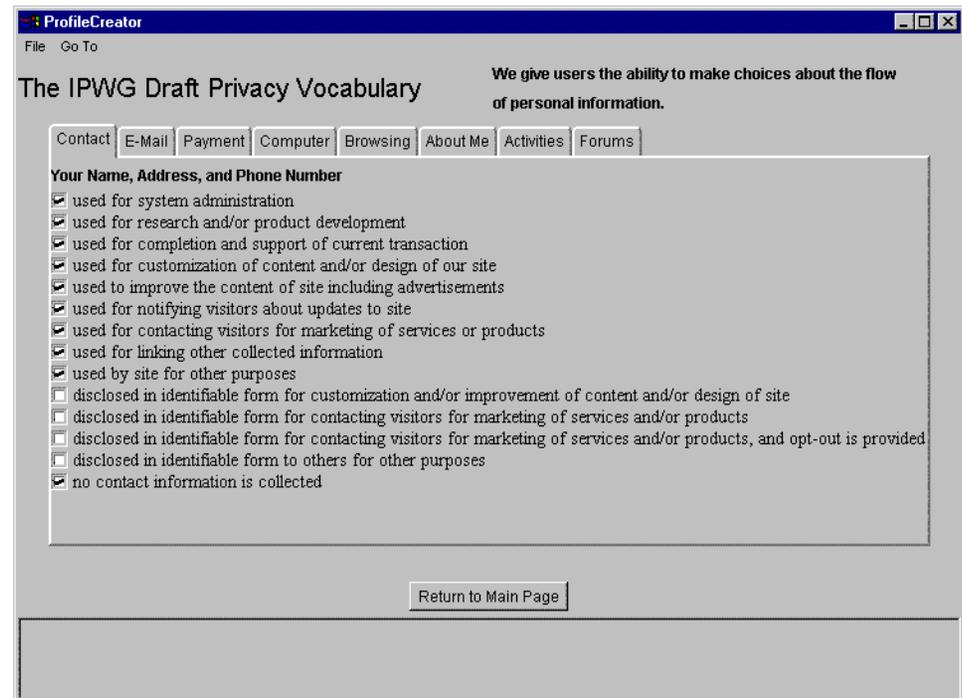
- Privacy policies are complex
- User privacy preferences are often complex and nuanced
- Users tend to have little experience articulating their privacy preferences
- Users are generally unfamiliar with much of the terminology used by privacy experts

Iterative design approach

- Four P3P user agent prototypes developed over 4-year period while P3P specification was under development
 - 1997 - W3C prototype
 - 1999 - Privacy Minder
 - 2000 - AT&T/Microsoft browser helper object
 - 2001 - AT&T usability testing prototype
- AT&T Privacy Bird beta released Feb. 2002
 - August 2002 user study
 - Beta 1.2 released Feb. 2003

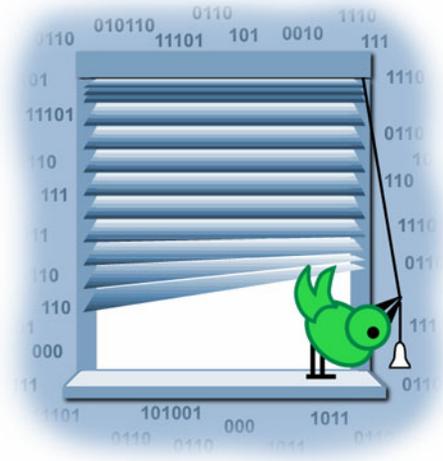
W3C prototype

- Based on pre-W3C draft of P3P vocabulary with 3 fields, $7 \times 9 \times 2 = 126$ combinations of elements
- Preference interface eliminated the impractical combos, combined 2 dimensions → $7 \times 14 = 98$ combinations
- Matrix represented by tabbed interface
- Feedback: too complicated, too many choices

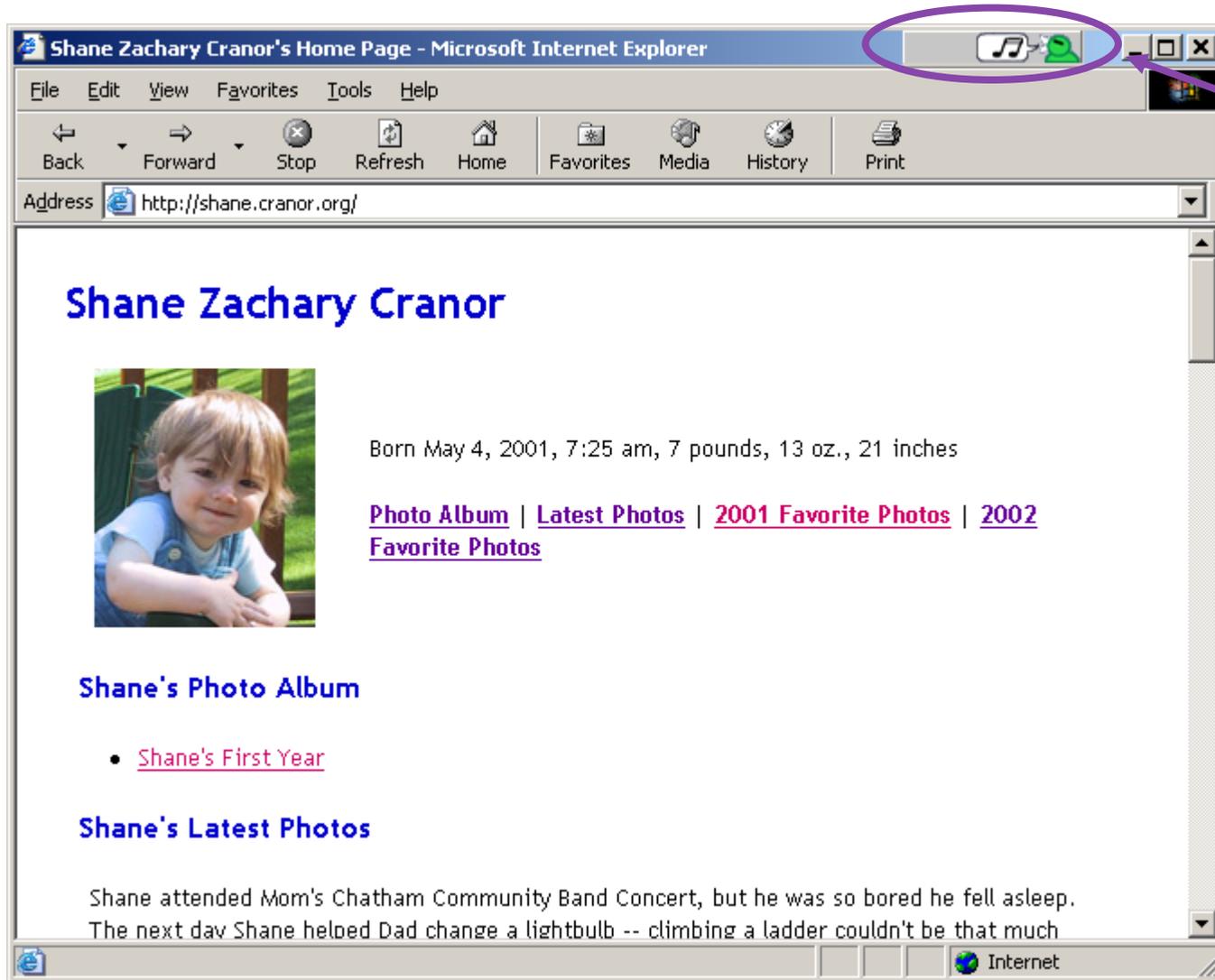


AT&T Privacy Bird

- Free download of beta from <http://privacybird.com/>
- “Browser helper object” for IE 5.01/5.5/6.0
- Reads P3P policies at all P3P-enabled sites automatically
- Puts bird icon at top of browser window that changes to indicate whether site matches user’s privacy preferences
- Clicking on bird icon gives more information
- Current version is information only – no cookie blocking



Chirping bird is privacy indicator



Click on the bird for more info

The screenshot shows a Microsoft Internet Explorer browser window with the address bar displaying <http://shane.cranor.org>. The main content area features a profile for Shane Zachary, including a photo of a young child and links to a photo album and latest photos. A 'Policy Summary' window is overlaid on the right side of the browser, titled 'Shane Cranor's Home Page Privacy Practices'. This window contains a 'Privacy Policy Check' section with a green message stating that the site's privacy policy matches the user's preferences. Below this is a 'Privacy Policy Summary' section that lists the following statements in its policy:

- [Site Statement 1](#)

Site Statement 1

Types of Information Collected:

- HTTP protocol information
- Click-stream information

How your information will be used:

- Research and development
- To complete the activity for which the data was provided
- Web site and system administration

Who will use your information:

- This web site and its agents

Privacy policy summary - mismatch

1-800-FLOWERS.COM - Flowers, Plants, Gourmet and Sweets, Unique Gifts a

1-800-FLOWERS.COM - Flowers, Plants, Gourmet and Sweets, Unique Gifts and Specialty Boutiques - Microsoft Internet Explorer

Back Forward

Address http://1-800-flor

1-800-flowers
your trusted guide

home flowers

welcome
you

may events:
27 Memorial Day

Policy Summary

1-800-Flowers.com, Inc. Privacy Practices

Privacy Policy Check

1-800-Flowers.com, Inc.'s privacy policy *does not match your preferences:*

- Unless you [opt-out](#), site may share financial information or information about your purchases with other companies (other than those helping the site provide services to you)
- Unless you [opt-out](#), site may share information that personally identifies you with other companies (other than those helping the site provide services to you)

Privacy Policy Summary

This site has the following statements in its policy:

- [Site Statement 1 - All users and customers](#)

Site Statement 1 - All users and customers

Types of Information Collected:

Link to opt-out page

33

Expand/collapse added in beta 1.2

Policy Summary

+ **Federal Trade Commission**

Privacy Policy Check

Federal Trade Commission's privacy policy *matches your preference*

Privacy Policy Summary

+ **Policy Statement 1 - Basic Information**
Data collected from all Web users: access logs, and search strings (if entered).

+ **Policy Statement 2 - Data Collection**

- **Access to your information**
This site allows you to access your own information about you from its records

+ **How to reach this site**

+ **How to resolve privacy-related issues**

More Information

Policy Summary

Click + for more

+ **Federal Trade Commission Privacy Practices**

Privacy Policy Check

Federal Trade Commission's privacy policy *matches your preference*

Privacy Policy Summary

- **Policy Statement 1 - Basic Information**
Data collected from all Web users: access logs, and search strings (if entered).

Types of Information that may be collected:

- search terms
- click-stream information

How your information may be used:

- To complete the activity for which the data was provided
- To do web site and system administration

Who may use your information:

- This web site and the companies that help the site provide services to you

Bird checks policies for embedded content

The screenshot shows a Microsoft Internet Explorer browser window displaying the Lycos website. An 'Embedded Content' dialog box is open, listing various URLs and their privacy check results. The dialog box has a title bar 'Embedded Content' and a close button. Below the title bar is a text area with the following text: 'The images and/or other content embedded in this web page are listed below. Some of this content may be covered by a different privacy policy than the rest of the page. Select a URL to view the privacy information related to that content.'

URL	Privacy Check	Type
http://a284.g.akamai.net/1/284/987/2h/lygo.com/s.gif	Unknown	Image
http://a676.g.akamai.net/1/676/987/12h/lygo.com/ly/0/hp/dotline_1...	Unknown	Image
http://a676.g.akamai.net/1/676/987/12h/lygo.com/ly/0/hp/foot_angl...	Unknown	Image
http://a676.g.akamai.net/1/676/987/12h/lygo.com/ly/0/hp/hp_shop_...	Unknown	Image
http://a676.g.akamai.net/1/676/987/12h/lygo.com/ly/0/hp/hp_shop_...	Unknown	Image
http://a676.g.akamai.net/1/676/987/12h/lygo.com/ly/0/hp/hp_topics...	Unknown	Image
http://a676.g.akamai.net/1/676/987/12h/lygo.com/ly/0/hp/hp_topics...	Unknown	Image
http://a676.g.akamai.net/1/676/987/12h/lygo.com/ly/0/hp/news_Bu...	Unknown	Image
http://a676.g.akamai.net/1/676/987/12h/lygo.com/ly/0/hp/s.gif	Unknown	Image
http://a676.g.akamai.net/1/676/987/12h/lygo.com/ly/0/hp/tools_ang...	Unknown	Image
http://a676.g.akamai.net/1/676/987/12h/lygo.com/ly/0/hp/tools_righ...	Unknown	Image
http://a676.g.akamai.net/1/676/987/12h/lygo.com/ly/0/hp/tools_righ...	Unknown	Image
http://a676.g.akamai.net/1/676/987/12h/lygo.com/ly/0/hp/topics_do...	Unknown	Image
http://a676.g.akamai.net/1/676/987/12h/lygo.com/ly/0/hp/valentine...	Unknown	Image
http://a676.g.akamai.net/1/676/987/12h/lygo.com/s.gif	Unknown	Image
http://hb.lycos.com/header?Z=142153&VID=1401&LHM=0&LHS=8	Matched	IFrame
http://ln.doubleclick.net/adi/ly.ln/f;h=f;pos=1;sz=468x60;tile=1;ord=10...	Matched	IFrame
http://lygo.com/ly/0/hp/s.gif	Unknown	Image
http://m.doubleclick.net/viewad/718598-buybooks468.gif	UnMatched	Image
http://www.lycos.com/css/genesis_ie.css	Matched	StyleShee

At the bottom of the dialog box, there are four buttons: 'Help', 'Policy Summary', 'View P3P Source', and 'Close'. The background shows the Lycos website with a navigation menu and a news headline: 'In News... "We Will Prevail!" Bush says America will be victorious in the State of Union...'

Privacy Bird icons



Privacy Preference Settings [X]

These settings control when a warning icon will be displayed at the top of your browser window. You can click on the warning icon for more information.

Select Privacy Level: Low Medium High Custom Imported

HEALTH OR MEDICAL INFORMATION

Warn me at web sites that use my health or medical information :

- For analysis, marketing, or to make decisions that may affect what content or ads I see, etc.
- To share with other companies (other than those helping the web site provide services to me)

FINANCIAL OR PURCHASE INFORMATION

Warn me at web sites that use my financial information or information about my purchases :

- For analysis, marketing, or to make decisions that may affect what content or ads I see, etc.
- To share with other companies (other than those helping the web site provide services to me)

PERSONALLY IDENTIFIABLE INFORMATION (name, address, phone number, email address, etc.)

Warn me at web sites that may contact me to interest me in other services or products :

- Via telephone
- Via other means (email, postal mail, etc.)
- And do not allow me to remove myself from marketing/ mailing lists

Warn me at web sites that use information that personally identifies me :

- To determine my habits, interests, or other characteristics
- To share with other companies (other than those helping the website provide services to me)
- Warn me at web sites that do not allow me to find out what data they have about me

NON-PERSONALLY IDENTIFIABLE INFORMATION (demographics, interests, web sites visited, etc.)

Warn me at web sites that use my non-personally identifiable information :

- To determine my habits, interests, or other characteristics
- To share with other companies (other than those helping the website provide services to me)

Evaluating P3P user agents

- Questions
 - Does P3P user agent perform useful function?
 - Can users use it effectively?
- Evaluation techniques
 - User survey
 - Laboratory study

Privacy Bird user survey

- ~20,000 downloads in first six months of beta trial
- Users asked whether they were willing to participate in survey when they downloaded software
- 2000 email addresses randomly selected from those willing to participate
- Sent invitation to fill out online 35-question survey

Privacy settings

- How often did you change your privacy settings?
 - Never: 25%
 - Once or twice: 52%
 - Several times: 21%
 - Ten or more times: 2%
- P3P experts changed their settings more frequently
- A few comments that people did not fully understand what all the choices mean

Example:
Sending flowers



1-800-SEND-FTD®

Customer Service ?
Shopping Cart
My Account

Search

GO

Flowers

Plants

Roses

Gourmet Gifts

More Gift Ideas

Deliver It Today

International Deliveries | Find a Florist | Reminder Service | Our Guarantee | Browse Our Store

Sign up for Savings!

FTD's 'Good as Gold' Guarantee – Fresh, beautiful flowers and plants that will last at least 7 days.

Email:

GO

Holidays

Valentine's Day

Occasions

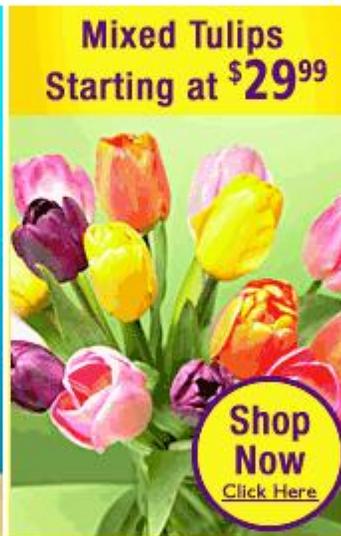
- Anniversary
- Birthday
- Congratulations
- Friendship
- Get Well
- Gifts for Business
- I'm Sorry
- Love & Romance
- New Baby
- Sympathy & Funeral
- Thank You
- Thinking of You
- Wedding

Shop By Price

Under \$25



Order Now More like this
\$34.99



Mixed Tulips
Starting at \$29⁹⁹

Shop
Now
Click Here



Order Now More like this
\$29.99

Privacy Finder

- Prototype developed at AT&T Labs, improved and deployed by CUPS
- Uses Google or Yahoo! API to retrieve search results
- Checks each result for P3P policy
- Evaluates P3P policy against user's preferences
- Reorders search results
- Composes search result page with privacy annotations next to each P3P-enabled result
- Users can retrieve "Privacy Report" similar to Privacy Bird policy summary

The screenshot shows a Mozilla Firefox browser window with the title "PrivacyFinder Search for: p3p:barnesandnoble.com/ - Mozilla Firefox". The address bar contains the URL "http://search.privacybird.com/?appel=medium&q=p3p:barnesandnoble.com/". The main content area displays a privacy policy summary for the site. It lists the types of information collected, how it is used, with whom it is shared, and how users can access their information.

PrivacyFinder Search for: p3p:barnesandnoble.com/ - Mozilla Firefox

File Edit View Go Bookmarks Tools Help

http://search.privacybird.com/?appel=medium&q=p3p:barnesandnoble.com/ Go

Show data collection, use, and sharing details...

This site may collect the following types of information about you:

- search terms
- HTTP protocol information
- click-stream information
- use of HTTP cookies
 - Information about your tastes or interests
 - Cookies and mechanisms that perform similar functions
 - Which pages you visited on this web site and how long you stayed at each page
 - Website login IDs and other identifiers (excluding government IDs and financial account numbers)
 - Information about the computer you are using, such as its hardware, software, or Internet address
 - Email address or other online contact information
 - Name, address, phone number, or other contact information
- third party's name
- home contact information (optional)
- server stores the transaction history
- user's name (optional)

The ways your information may be used:

- To aid in historical preservation as governed by a law or policy described in this privacy policy
- To contact you through means other than telephone (for example, email or postal mail) to market services or products -- unless you [opt-out](#)
- To make decisions that directly affect you using information about you, for example to recommend products or services based on your previous purchases -- unless you [opt-out](#)
- To customize the site for your current visit only
- To do research and analysis in which your information may be linked to an ID code but not to your personal identity
- To contact you by telephone to market services or products -- unless you [opt-out](#)
- For research and development, but without connecting any information to you
- To perform web site and system administration
- To provide the service you requested

With whom this site may share your information:

- Other companies whose privacy policies are unknown to this site -- unless you [opt-out](#)
- Companies that have privacy policies similar to this site's -- unless you [opt-out](#)
- Delivery companies that help this site fulfill your requests and who may also use your information in other ways

Access to your information

Done

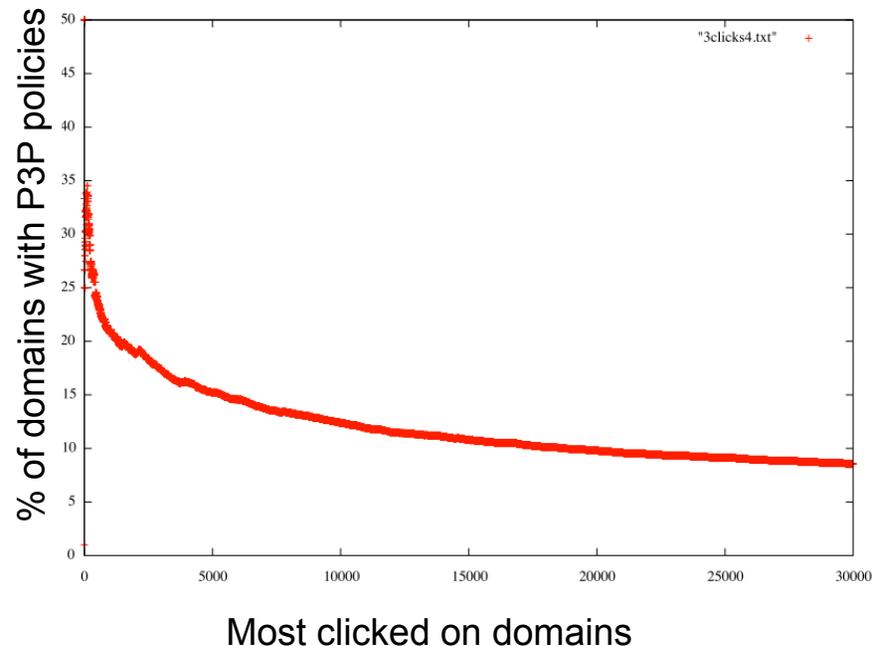
P3P Adoption Studies

- Compiled two lists of search terms:
 - Typical: 20,000 terms randomly sampled from one week of AOL user search queries
 - Ecommerce: 940 terms screen scraped from Froogle front page
- Submitted search terms to Google, Yahoo!, and AOL search engines and collected top 20 results for each term
- Checked each result for P3P policy and evaluated policies against 5 “rulesets” and P3P validator
- Saved 1,232,955 annotated search results in database
- Separately checked for P3P policies on 30,000 domains most clicked on by AOL search engine users

L. Cranor, S. Egelman, S. Sheng, A. McDonald, and A. Chowdhury.
[P3P Deployment on Websites](#). Electronic Commerce Research and Applications, 2008.

Results: P3P deployment

- 10% of results from typical search terms have P3P
- 21% of results from ecommerce search terms have P3P
- More popular sites are more likely to have P3P
 - 5% of sites in our cache have P3P
 - 9% of 30K most clicked on domains have P3P
 - 17% of clicks to 30K most clicked on domains have P3P



Results: Frequency of P3P-enabled hits

- 83% of searches had at least one P3P-enabled site in top 20 results
- 68% of searches had at least one P3P-enabled site in top 10 results
- For top 20 search results returned by AOL search engine for typical search terms:
 - 29% return at least 1 P3P-enabled hit that matches medium privacy preferences
 - 34% return at least 1 P3P-enabled hit in that does not share data
 - 31% return at least 1 P3P-enabled hit that does not market without opt-in
 - Thus, ~ 1/3 of the time AOL users will find site with “good” privacy policy in first 2 pages of results

Does Privacy Finder influence purchases?

- Yes!
- J. Tsai, S. Egelman, L. Cranor, and A. Acquisti.
[The Effect of Online Privacy Information on Purchasing Behavior: An Experimental Study.](#)
Paper presented at the Workshop on the Economics of Information Security, June 7-8, 2007, Pittsburgh, PA.

P3P deployment overview

- Create a privacy policy
- Analyze the use of cookies and third-party content on your site
- Determine whether you want to have one P3P policy for your entire site or different P3P policies for different parts of your site
- Create a P3P policy (or policies) for your site
- Create a policy reference file for your site
- Configure your server for P3P
- Test your site to make sure it is properly P3P enabled

One policy or many?

- P3P allows policies to be specified for individual URLs or cookies
- One policy for entire web site (all URLs and cookies) is easiest to manage
- Multiple policies can allow more specific declarations about particular parts of the site
- Multiple policies may be needed if different parts of the site have different owners or responsible parties (universities, CDNs, etc.)

Third-party content

- Third-party content should be P3P-enabled by the third-party
- If third-party content sets cookies, IE6 will block them by default unless they have P3P compact policy
 - But this can be circumvented!
- Your first-party cookies may become third-party cookies if your site is framed by another site, a page is sent via email, etc.

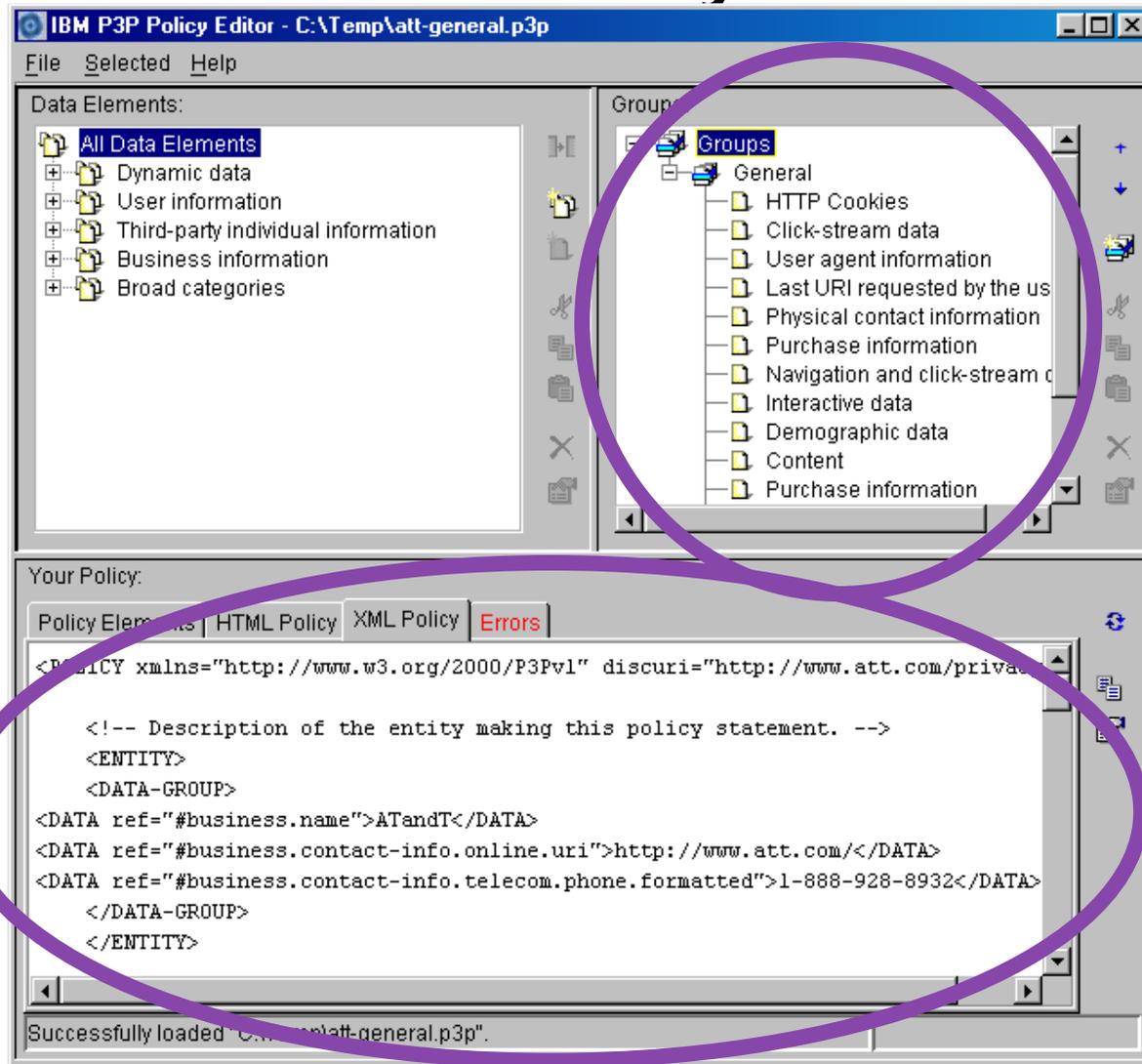
Cookies and P3P

- P3P policies must declare all the data stored in a cookie as well as any data linked via the cookie
- P3P policies must declare all uses of stored and linked cookie data
- Sites should not declare cookie-specific policies unless they are sure they know where their cookies are going!
 - Watch out for domain-level cookies
 - Most sites will declare broad policy that covers both URLs and cookies

Generating a P3P policy

- Edit by hand
 - Cut and paste from an example
- Use a P3P policy generator
 - Recommended: IBM P3P policy editor
<http://www.alphaworks.ibm.com/tech/p3peditor>
- Generate compact policy and policy reference file the same way (by hand or with policy editor)
- Get a book
 - Web Privacy with P3P
by Lorrie Faith Cranor
<http://p3pbook.com/>

IBM P3P Policy Editor



Sites can list the types of data they collect

And view the corresponding P3P policy

Locating the policy reference file

- Place policy reference file in “well known location” /w3c/p3p.xml
 - Most sites will do this
- Use special P3P HTTP header
 - Recommended only for sites with unusual circumstances, such as those with many P3P policies
- Embed link tags in HTML files
 - Recommended only for sites that exist as a directory on somebody else’s server (for example, a personal home page)

Compact policies

- HTTP header with short summary of full P3P policy for cookies (not for URLs)
- Not required
- Must be used in addition to full policy
- Must commit to following policy for lifetime of cookies
- May over simplify site's policy
- IE6 relies heavily on compact policies for cookie filtering – especially an issue for third-party cookies

Server configuration

- Only needed for compact policies and/or sites that use P3P HTTP header
- Need to configure server to insert extra headers
- Procedure depends on server – see P3P Deployment Guide appendix
<http://www.w3.org/TR/p3pdeployment> or Appendix B of Web Privacy with P3P

Don't forget to test!

- Make sure you use the P3P validator to check for syntax errors and make sure files are in the right place <http://www.w3.org/P3P/validator/> or <http://validator.privacyfinder.org/>
 - But validator can't tell whether your policy is accurate
- Use P3P user agents to view your policy and read their policy summaries carefully
- Test multiple pages on your site

Assertions in a P3P policy

- General assertions
 - Location of human-readable policies and opt-out mechanisms – discuri, opturi attributes of <POLICY>
 - Indication that policy is for testing only – <TEST> (optional)
 - Web site contact information – <ENTITY>
 - Access information – <ACCESS>
 - Information about dispute resolution – <DISPUTES> (optional)
- Data-Specific Assertions
 - Consequence of providing data – <CONSEQUENCE> (optional)
 - Indication that no identifiable data is collected – <NON-IDENTIFIABLE> (optional)
 - How data will be used – <PURPOSE>
 - With whom data may be shared – <RECIPIENT>
 - Whether opt-in and/or opt-out is available – required attribute of <PURPOSE> and <RECIPIENT>
 - Data retention policy – <RETENTION>
 - What kind of data is collected – <DATA>

P3P/XML encoding

```
<POLICIES xmlns="http://www.w3.org/2002/01/P3Pv1">  
<POLICY discuri="http://p3pbook.com/privacy.html"  
  name="policy">
```

P3P version

Location of
human-readable
privacy policy

P3P policy name

Site's
name
and
contact
info

```
<ENTITY>  
<DATA-GROUP>  
  <DATA  
    ref="#business.contact-info.online.email">privacy@p3pbook.com  
  </DATA>  
  <DATA  
    ref="#business.contact-info.online.uri">http://p3pbook.com/  
  </DATA>  
  <DATA ref="#business.name">Web Privacy With P3P</DATA>  
</DATA-GROUP>  
</ENTITY>
```

Access disclosure

Human-readable
explanation

Statement

```
<ACCESS><nonident/></ACCESS>  
<STATEMENT>  
  <CONSEQUENCE>We keep standard web server logs.</CONSEQUENCE>  
  <PURPOSE><admin/><current/><develop/></PURPOSE>  
  <RECIPIENT><ours/></RECIPIENT>  
  <RETENTION><indefinitely/></RETENTION>  
  <DATA-GROUP>  
    <DATA ref="#dynamic.clickstream"/>  
    <DATA ref="#dynamic.http"/>  
  </DATA-GROUP>  
</STATEMENT>
```

How data may
be used

Data recipients

Data retention policy

Types of data collected

```
</POLICY>  
</POLICIES>
```

Reading the P3P specification

- <http://www.w3.org/TR/P3P11/>



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