

# Privacy Policies

*Patrick Gage Kelley*



## Amazon.com Privacy Notice

Last updated: October 1, 2008. To see what has changed, [click here](#).

Amazon.com knows that you care how information about you is used and shared, and we appreciate your trust that we will do so carefully and sensibly. This notice describes our privacy policy. **By visiting Amazon.com, you are accepting the practices described in this Privacy Notice.**

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## What Personal Information About Customers Does Amazon.com Gather?

The information we learn from customers helps us personalize and continually improve your shopping experience at Amazon.com. Here are the types of information we gather.

- **Information You Give Us:** We receive and store any information you enter on our Web site or give us in any other way. [Click here](#) to see examples of what we collect. You can choose not to provide certain information, but then you might not be able to take advantage of many of our features. We use the information that you provide for such purposes as responding to your requests, customizing future shopping for you, improving our stores, and communicating with you.
- **Automatic Information:** We receive and store certain types of information whenever you interact with us. For example, like many Web sites, we use "cookies," and we obtain certain types of information when your Web browser accesses Amazon.com or advertisements and other content served by or on behalf of Amazon.com on other Web sites. [Click here](#) to see examples of the information we receive.
- **E-mail Communications:** To help us make e-mails more useful and interesting, we often receive a confirmation when you open e-mail from Amazon.com if your computer

- **E-mail Communications:** Other than as set out above, you will receive notice when we send e-mails more useful and interesting, we often receive a confirmation when you open e-mail from Amazon.com if your computer supports such capabilities. We also compare our customer list to lists received from other companies, in an effort to avoid sending unnecessary messages to our customers. If you do not want to receive e-mail or other mail from us, please adjust your [Customer Communication Preferences](#).
- **Information from Other Sources:** We might receive information about you from other sources and add it to our account information. [Click here](#) to see examples of the information we receive.

### What About Cookies?

- Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your Web browser to enable our systems to recognize your browser and to provide features such as [1-Click](#) purchasing, [Recommend for You](#), personalized advertisements on other Web sites (e.g., Amazon Associates with content served by Amazon.com and Web sites using Checkout by Amazon payment service), and storage of items in your Shopping Cart between visits.
- The help portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Additionally, you can disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-on's settings or visiting the Web site of its manufacturer. However, because cookies allow you to take advantage of some of Amazon.com's essential features, we recommend that you leave them turned on. For instance, if you block or otherwise reject our cookies, you will not be able to add items to your Shopping Cart, proceed to Checkout, or use any Amazon.com products and services that require you to Sign In.

### Does Amazon.com Share the Information It Receives?

Information about our customers is an important part of our business, and we are not in the business of selling it to others. We share customer information only as described below and with subsidiaries Amazon.com, Inc. controls that either are subject to this Privacy Notice or follow practices at least as protective as those described in this Privacy Notice.

- **Affiliated Businesses We Do Not Control:** We work closely with affiliated businesses. In some cases, such as Marketplace sellers, these businesses operate stores at Amazon.com or sell offerings to you at Amazon.com. In other cases, we operate stores, provide services, or sell product lines jointly with these businesses. [Click here](#) for some examples of co-branded and joint offerings. You can tell when a third party is involved in your transactions, and we share customer information related to these transactions with that third party.
- **Third-Party Service Providers:** We employ other companies and individuals to perform functions on our behalf. Examples include fulfilling orders, delivering packages, sending postal mail and e-mail, removing repetitive information from customer lists, analyzing data, providing marketing assistance, providing search results and links (including paid listings and links), processing credit card payments, and providing customer service. They have access to personal information needed to perform their functions, but may not use it for other purposes.
- **Promotional Offers:** Sometimes we send offers to selected groups of Amazon.com customers on behalf of other businesses. When we do this, we do not give that business your name and address. If you do not want to receive such offers, please adjust your [Customer Communication Preferences](#).
- **Business Transfers:** As we continue to develop our business, we might sell or buy stores, subsidiaries, or business units. In such transactions, customer information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice (unless, of course, the customer consents otherwise). Also, in the unlikely event that Amazon.com, Inc., or substantially all of its assets are acquired, customer information will of course be one of the transferred assets.
- **Protection of Amazon.com and Others:** We release account and other personal information when we believe release is appropriate to comply with the law, enforce or apply our [Conditions of Use](#) and other agreements; or protect the rights, property, or safety of Amazon.com, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction. Obviously, however, this does not include selling, renting, sharing, or otherwise disclosing personally identifiable information from customers for commercial purposes in violation of the commitments set forth in this Privacy Notice.
- **With Your Consent:** Other than as set out above, you will receive notice when information about you might go to third parties, and you will have an opportunity to choose not to share the information.

### How Secure Is Information About Me?

- We work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information you input.
- We reveal only the last five digits of your

- **With Your Consent:** Other than as set out above, you will receive notice when we send information about you might go to third parties, and you will have an opportunity to choose not to share the information.

### How Secure Is Information About Me?

- We work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information you input.
- We reveal only the last five digits of your credit card numbers when confirming an order. Of course, we transmit the entire credit card number to the appropriate credit card company during order processing.
- It is important for you to protect against unauthorized access to your password and to your computer. Be sure to sign off when finished using a shared computer. [Click here](#) for more information on how to sign off.

### What About Third-Party Advertisers and Links to Other Websites?

Our site includes third-party advertising and links to other Web sites. We do not provide any personally identifiable customer information to these advertisers or third-party Web sites. [Click here](#) for more information about our Advertising Policies and Specifications.

These third-party Web sites and advertisers, or Internet advertising companies working on their behalf, sometimes use technology to send (or "serve") the advertisements that appear on our Web site directly to your browser. They automatically receive your IP address when this happens. They may also use cookies, JavaScript, web beacons (also known as action tags or single-pixel gifs), and other technologies to measure the effectiveness of their ads and to personalize advertising content. We do not have access to or control over cookies or other features that they may use, and the information practices of these advertisers and third-party Web sites are not covered by this Privacy Notice. Please contact them directly for more information about their privacy practices. In addition, the [Network Advertising Initiative](#) offers useful information about Internet advertising companies (also called "ad networks" or "network advertisers"), including information about how to opt-out of their information collection.

Amazon.com also displays personalized third-party advertising based on personal information about customers, such as purchases on Amazon.com, visits to Amazon Associate Web sites, or use of payment services like Checkout by Amazon on other Web sites. [Click here](#) for more information about the personal information that we gather. Although Amazon.com does not provide any personal information to advertisers, advertisers (including ad-serving companies) may assume that users who interact with or click on a personalized advertisement meet their criteria to personalize the ad (for example, users in the northwestern United States who bought or browsed for classical music). If you do not want us to use personal information that we gather to allow third parties to personalize advertisements we display to you, please adjust your [Advertising Preferences](#).

### Which Information Can I Access?

Amazon.com gives you access to a broad range of information about your account and your interactions with Amazon.com for the limited purpose of viewing and, in certain cases, updating that information. [Click here](#) to see some examples, the list of which will change as our Web site evolves.

### What Choices Do I Have?

- As discussed above, you can always choose not to provide information, even though it might be needed to make a purchase or to take advantage of such Amazon.com features as [Your Profile](#), [Web Logs](#), [Customer Reviews](#), and [Amazon Prime](#).
- You can add or update certain information on pages such as those referenced in the ["Which Information Can I Access?"](#) section. When you update information, we usually keep a copy of the prior version for our records.
- If you do not want to receive e-mail or other mail from us, please adjust your [Customer Communication Preferences](#). (If you do not want to receive our e-mail and other legal notices from us, such as this Privacy Notice, those notices will still govern your use of Amazon.com, and it is your responsibility to review them for changes.)
- If you do not want us to use personal information that we gather to allow third parties to personalize advertisements we display to you, please adjust your [Advertising Preferences](#).
- The help portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Additionally, you can disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-on's settings or visiting the Web site of its manufacturer. However, because cookies allow you to take advantage of some of Amazon.com's essential features, we recommend that you leave them turned on. For instance, if you block or otherwise reject

### Are Children Allowed to Use Amazon.com?

Amazon.com does not sell products for purchase by children. We sell children's products for purchase by adults. If you are under 18, you may use Amazon.com only with the involvement of a parent or guardian.

### Does Amazon.com Participate in the Safe Harbor Program?

Amazon.com is a participant in the Safe harbor program developed by the U.S. Department of Commerce and the European Union. We have certified that we adhere to the Safe Harbor Privacy Principles agreed upon by the U.S. and the E.U. For more information about the Safe Harbor and to view our certification, visit the [U.S. Department of Commerce's Safe Harbor](#) Web site. If you would like to contact Amazon.com directly about the Safe Harbor program, please send an e-mail to [safeharbor@amazon.com](mailto:safeharbor@amazon.com).

### Conditions of Use, Notices, and Revisions

If you choose to visit Amazon.com, your visit and any dispute over privacy is subject to this Notice and our [Conditions of Use](#), including limitations on damages, resolution of disputes, and application of the law of the state of Washington. If you have any concern about privacy at Amazon.com, please [contact us](#) with a thorough description, and we will try to resolve it. Our business changes constantly, and our Privacy Notice and the [Conditions of Use](#) will change also. We may e-mail periodic reminders of our notices and conditions, unless you have instructed us not to, but you should check our Web site frequently to see recent changes. Unless stated otherwise, our current Privacy Notice applies to all information that we have about you and your account. We stand behind the promises we make, however, and will never materially change our policies and practices to make them less protective of customer information collected in the past without the consent of affected customers.

### Related Practices and Information

- [Conditions of Use](#)
- [Discussion Boards](#)
- [Community Rules](#)
- [Help documents](#)
- [Most Recent Purchases](#)
- [Your Profile and Community Guidelines](#)

### Examples of Information Collected

#### Information You Give Us

You provide most such information when you search, buy, bid, post, participate in a contest or questionnaire, or communicate with customer service. For example, you provide information when you search for a product; place an order through Amazon.com or one of our third-party sellers; provide information in [Your Account](#) (and you might have more than one if you have used more than one e-mail address when shopping with us) or [Your Profile](#); communicate with us by phone, e-mail, or otherwise; complete a questionnaire or a contest entry form; complete [Web Logs](#) or other gift registries; provide employer information when opening a corporate account; participate in [Discussion Boards](#) or other community features; provide and rate [Reviews](#); specify a [Special Occasion Reminder](#); share information with [Amazon Friends](#); and employ other Personal Notification Services, such as Available to Order Notifications. As a result of those actions, you might supply us with such information as your name, address, and phone numbers; credit card information; people to whom purchases have been shipped, including addresses and phone numbers; people (with addresses and phone numbers) listed in [1-Click](#) settings; e-mail addresses of [Amazon Friends](#) and other people; content of reviews and e-mails to us; personal description and photograph in [Your Profile](#); and financial information, including Social Security and driver's license numbers.

#### Automatic Information

Examples of the information we collect and analyze include the Internet protocol (IP) address used to connect your computer to the Internet; login; e-mail address; password; computer and connection information such as browser type, version, and time zone setting; browser plug-in types and versions; operating system, and platform; purchase history, which we sometimes aggregate with similar information from other customers to create features such as [Purchase Guides](#) and [Tailored](#) the full Uniform Resource Locator (URL) clicked on, through, and from our Web site, including date and time; cookie number; products you viewed or searched for; and the phone number you used to call our 800 number. We may also use browser data such as cookies, Flash cookies (also known as Flash Local Shared Objects), or similar data on certain parts of our Web site for fraud protection and other purposes. During some visits we may use software tools such as JavaScript to measure and collect session information, including page response



today we will focus on  
evaluation methodology

but first, a little history.

# Federal Trade Commission

## *Privacy Online: A Report to Congress*

June 1998

“ In light of the Commission's findings and significant consumer concerns regarding privacy online, it is evident that substantially greater incentives are needed to spur self-regulation and ensure widespread implementation of basic privacy principles. ”

survey of over **1,400** Web sites

upward of **85%** – collect personal information from consumers.

only **14%** – provide any notice with respect to their information practices

**~2%** – provide notice by means of a comprehensive privacy policy.

“ The Commission has encouraged industry to address consumer concerns regarding online privacy through **self-regulation**. The Internet is a rapidly changing marketplace. Effective self-regulation remains desirable ... To date, however, the Commission has not seen an effective self-regulatory system emerge. ”

Chairman Pitofsky recommended that Congress pass legislation if self-regulation failed to produce significant progress. [EPIC2005]

However, by 1999 privacy policies were found on over 80% of top websites. [EPIC1999]

# Electronic Privacy Information Center (EPIC)

## *Privacy Self Regulation: A Decade of Disappointment*

March 2005

“ Industry progress has been far too slow since the Commission first began encouraging the adoption of voluntary fair information practices in 1996. Notice, while an essential first step, is not enough if the privacy practices themselves are toothless. ”

– Commissioner Sheila Anthony



**Notice, while an essential first step, is not enough if the privacy practices themselves are toothless...**



Common to all of these documents [hereinafter referred to as "fair information practice codes"] are five core principles of privacy protection:

1. Notice/Awareness
2. Choice/Consent
3. Access/Participation
4. Integrity/Security
5. Enforcement/Redress





May 21, 2004

Dear Consumer,

To answer your question of what rights you have over the information that we have about you, there are none. We are a third party data collection company and we import information about each subject from several different sources including credit bureaus and utility companies. If you find that the information supplied to you from us is inaccurate, you may take that up with those companies.

Thank you for using LocatePlus.

A handwritten signature in cursive script, appearing to read "Anne Ouellette".

Anne Ouellette  
LocatePlus.com Customer Service

“ The FTC should work with the banking agencies to develop a unified mechanism for opting out under the Gramm-Leach-Bliley and Fair Credit Reporting Acts. Just as it made no sense for individuals to opt-out of every telemarketing call, it currently makes no sense for an individual to have to contact every single financial institution separately to protect privacy. ”

“For example, they state that *you receive* unsolicited email messages instead of *we send* them.”

“The corpus of privacy policies contains 948 instances of *may* and 123 instances of *might, perhaps, sometimes, occasional(ly), and from time to time...*”

The average Flesch-Kincaid score required for the top 50 internet privacy policies (2003) was 34.2

The Wall Street Journal averages a 43  
Harvard Law Review averages a 32



Aleecia McDonald & Lorrie Cranor

# *The Cost of Reading Privacy Policies*

2008

p is the population of all Internet users

R is the average time to read one policy

n is the average number of unique sites Internet users visit annually

$$T_R = p \times R \times n$$

$p \approx$  **221 million** Americans online (Nielsen, May 2008)

$R$  = avg time to read a policy  
= # words in policy / reading rate

To estimate words per policy:

Measured the policy length of the 75 most visited websites

Reflects policies people are most likely to visit

Reading rate  $\approx$  250 WPM

Mid estimate: 2,514 words / 250 WPM = **10 minutes**

$n$  = number of unique sites per year

Nielsen estimates Americans visit 185 unique sites in a month:

but that doesn't quite scale x12, so **1462 unique sites** per year.

$$T_R = p \times R \times n$$

$$T_R = 221 \text{ million} \times 10 \text{ minutes} \times 1462 \text{ sites}$$

$R \times n \approx 244$  hours per year per person  
(lower: 181; upper: 304)

$T_R \approx 53.8$  billion hours for all United States Internet users per year  
(lower: 39.9 billion; upper: 67.1 billion)

Personal  
\$3,534  
\$2,226

National  
\$781 B  
\$492 B

“Time to read is greater than the time to handle spam, and on par with the current time websurfing”

“Value of time to read or skim is several times greater than the cost of broadband access”

# Industry Self Regulation in **Theory**

- Website owners voluntarily post online privacy policies
- FTC enforces policies via deceptive practices and fraud actions
- Consumers:
  - Visit new sites and read their online privacy policies
  - Compare policies between sites
  - Buy from sites with the best privacy policies
- This creates a market place that efficiently rewards privacy protections



# Industry Self Regulation in **Practice**

- Website owners voluntarily post online privacy policies
- FTC enforces policies via deceptive practices and fraud actions
- **Consumers:**
  - **Visit new sites** ~~and read their online privacy policies~~
  - ~~Compare policies between sites~~
  - **Buy from sites** ~~with the best privacy policies~~
- ~~This creates a market place that efficiently rewards privacy protections~~

Aleecia McDonald, Robert Reeder,  
Patrick Gage Kelley & Lorrie Cranor

# *A Comparative Study of Online Privacy Policies and Formats*

August 2009

“Do standardized policy  
formats help?”

August – December, 2008

Recruited via blogs and craigslist  
for gift certificate drawing

15 conditions

n = 749; 50 per condition

Younger, well-educated, and  
confident with computers

# Acme Privacy Summary

## Scope

This policy discloses what information we gather about you when you visit any of our Web sites (all acme.com and Acme Network sites) or buy product directly from us. For more details, please refer to our [full privacy policy](#).

## Personal Information

Acme collects two kinds of information about users:

1. data that users volunteer by signing up to receive news and product information, entering contests, completing surveys, or buying directly from us
2. aggregated tracking data we collect when users interact with us, such as access logs and web cookies

For more information about our information collection practices, please see our [full policy](#).

## Uses

- We use the personal information you provide voluntarily to send information you've requested and to fulfill orders.
- When you sign up online to receive Acme Network newsletters, Acme product and company news, and to participate in talkbacks on our sites you must provide your name, email address, and a password. We never sell or rent your email address or other personally identifiable information you provide us under these circumstances.
- When you register for an Acme conference, or sign up for a conference email list, we will send you email announcements and updates about Acme conferences. We send conference brochures to past conference attendees.
- When you order books directly from us, or request book catalogs, we add you to our snailmail list, and we'll send you catalogs and other marketing pieces.
- When you enter a contest or sweepstakes, we may ask for your name, address, and email



# Acme Incorporated Privacy Practices

[Opt-Out](#) | [Contact Site](#)

## Acme Incorporated may share your information with:

- Companies that help this site fulfill your requests (for example, shipping a product to you), but these companies must not use your information for any other purpose
- Delivery companies that help this site fulfill your requests and who may also use your information in other ways
- Companies that are accountable to this site, though their privacy policies may be different from this site's
- People who may access your information from a public area, such as a bulletin board, chat room, or directory -- only if you request this

## Privacy Policy Summary

### Policy Statement 1 - Access log information

Our Web server collects access logs containing this information.

[Show data collection, use, and sharing details...](#)

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

- HTTP protocol information
- click-stream information

### The ways your information may be used:

- For research and development, but without connecting any information to you
- To provide the service you requested
- To perform web site and system administration

### With whom this site may share your information:

Companies that help this site fulfill your requests (for example, shipping a product to you), but these



		NL Pages	Reading Ease	% Passive	# cross references	PF Words	NL Words
	A	13	31.8	11%	27	880	6329
	B	7	35.5	22%	0	1964	3725
	C	6	36.3	17%	7	2011	2920
	D	8	42.8	18%	2	554	2586
	E	8	44.9	11%	0	1373	2550
	F	3	46.3	9%	1	1843	928

Flesch-Kinkaid Reading Ease

- 0-29: Very Confusing
- 30-49: Difficult
- 50-59: Fairly Difficult

Training question first, company's address: end of policy

Percentage correct answers for four random order questions:

1. Does the Acme website use cookies?
2. Does the company provide a link to a webform that allows you to remove yourself from Acme's email marketing list?
3. Does this privacy policy allow Acme to share your email address with a company that might put you on their email marketing list (with or without your consent)?
4. Does this privacy policy allow Acme to use your phone number for telemarketing?

Also measured response times

## **All formats unsatisfactory**

- Low comprehension for synthesis questions
- Participants disliked all

## **Better readability for NL did not improve comprehension**

Larger than expected range within standardized formats

- Same practices, different results - Authors have much leeway

## **Current standardized formats not very different from NL**

- PF better for complexity if topic part of P3P specification
- Layered faster yet less accurate: link hides information

## **Policy implications:**

- Test new formats rigorously
- We do not suggest regulation requiring standardized formats
- Standardization remains a promising idea — can we do better in future revisions?



**LOW FALL FARES AT  
CONTINENTAL.COM.**

Continental Airlines

# The New York Times

Monday, October 5, 2009 Last Update: 10:16 PM ET

Fares from **\$117** round trip

Taxes and fees apply.

Continental Airlines

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REAL ESTATE  
AUTOS  
ALL CLASSIFIEDS

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SPORTS  
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Music  
Television  
Theater  
STYLE  
Dining & Wine  
Fashion & Style  
Home & Garden  
Weddings/  
Celebrations  
TRAVEL

## As Job Loss Rises, Obama Aides Act to Fix Safety Net

By JACKIE CALMES  
3 minutes ago

Administration officials said that a new effort to combat unemployment would not add up to a second stimulus package, only an extension of the first.

## U.S. Push to Expand in Pakistan Meets Resistance

By JANE PERLEZ 9 minutes ago

American efforts to increase aid, as well as the footprint of its embassy and of private security contractors, are aggravating an already volatile mood among senior Pakistani officials.

• Blast at U.N. Office in Pakistan Kills 5 3:27 PM ET

Post a Comment | Read (36)



Jenn Ackerman/The New York Times

## Soon, Bloggers Must Give Full Disclosure

By TIM ARANGO 12 minutes ago

The government will seek to slow the spread of false "word of mouth" promotions in exchange for free product samples. Above, Katja Presnal, a blogger in Beacon, N.Y.

## In Debate on Health, It's Coverage vs. Cost

By ROBERT PEAR

Democrats want people to pay affordable prices for health insurance, but they want those policies to offer

## North Korea Says U.S. Key to Nuclear Talks Return

By REUTERS 17 minutes ago

North Korea said it was ready to return to international talks on ending its nuclear weapons

## OPINION »

### THE OPINIONATOR Did Iran Blink?

Contrasting views on if last week's summit mattered.



- Krugman: The Politics of Spite | Comments
- Cohen: Public Imperative
- Douthat: Inequality
- Editorial: Supreme Court
- Home Fires: World's Wonders

## SCIENCE TIMES »

### A Hunt for Lost Art

Leonardo da Vinci probably would have loved the use of scientific gadgetry to locate his lost masterpiece.



- Post a Comment | Graphic
- TierneyLab: The Lost Masterpiece(s)

## HEALTH »

### How Nonsense Sharpens the Intellect

When things don't add up, the mind goes into high gear.



## MARKETS »

At 10:06 PM ET

JAPAN	CHINA
Nikkei	Shanghai
9,675.00	2,779.43
+0.51	Closed for holiday
+0.01%	Data
	delayed at least 15 minutes

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Stock, ETFs, Funds

Go

**HSBC  
PREMIER**  
The world's local bank

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Insurance, When the Patient Is a Pet



Thom Yorke's Unlikely New Band Has Its Debut



After Quiet Finish, Mets Plan for Busy Off-Season

## Notebook

The Forbes's™ billionaire review doesn't represent garden-variety inequality.



Bug by Bug, Google Fixes a New Idea



Letters: Assessing Those Who Grade the Tests

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Insurance, When the Patient Is a Pet



Thom Yorke's Unlikely New Band Has Its Debut



After Quiet Finish, Mets Plan for Busy Off-Season

## Notebook

The Forbes's™ billionaire review doesn't represent garden-variety inequality.



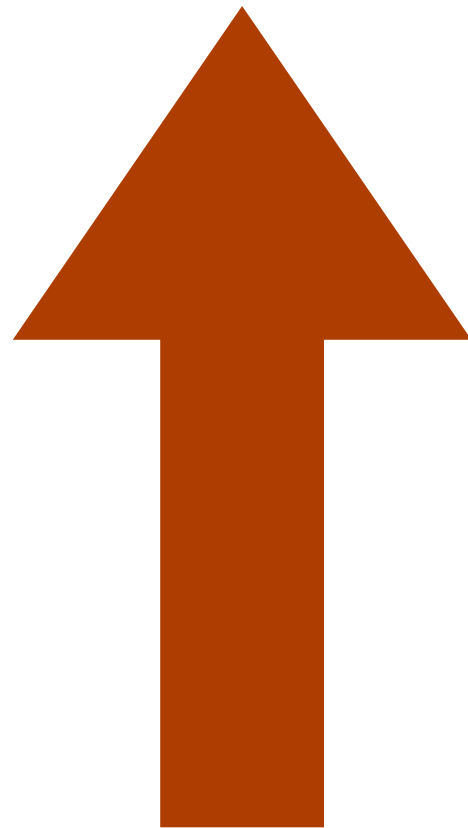
Bug by Bug, Google Fixes a New Idea



Letters: Assessing Those Who Grade the Tests

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# The New York Times Privacy Policy Highlights

Last Updated on July 1, 2009

The New York Times wants to make our privacy practices clear and easy to understand. This page provides highlights of The New York Times Privacy Policy. For more information, please review our [complete Privacy Policy](#).

The New York Times is a licensee of the TRUSTe Privacy Program. You may contact TRUSTe if you believe a privacy question is not properly addressed.

By using NYTimes.com, you are agreeing to our [Terms of Service](#).

## Scope

The New York Times privacy highlights and full Privacy Policy (available at: [www.nytimes.com/ref/membercenter/help/privacy.html](http://www.nytimes.com/ref/membercenter/help/privacy.html)) apply to the New York Times Web sites listed below, and to services that display or link to this notice.

- [NYTimes.com](#)
- [The New York Times Home Delivery](#)
- [The New York Times Store](#)
- [The New York Times Learning Network](#)

The New York Times Electronic Edition, which is maintained by NewsStand, maintains its own [Privacy Statement](#). The New York Times advertising portal, for advertisers of The Times, also maintains a separate [Privacy Policy](#).

## Information We Gather

The information we gather falls into two categories: 1) personal information you voluntarily supply when you subscribe, order, complete a survey, register for an online discussion, enter a contest or provide your e-mail address, and 2) tracking information collected as you navigate through our sites. [More](#).

## Use of Information

- If you have registered online to one of our sites, The New York Times will not sell, rent, swap or authorize any third party to use your e-mail address without your permission. This also applies to any information that personally identifies you, except as noted immediately below. We do, however, share information about our



The New York Times

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### The New York Times Privacy Policy Highlights

Last Updated on July 1, 2009

The New York Times wants to make our privacy practices clear and easy to understand. This page provides highlights of The New York Times Privacy Policy. For more information, please review our [complete Privacy Policy](#).

The New York Times is a licensee of the TRUSTe Privacy Program. You may contact TRUSTe if you believe a privacy question is not properly addressed.

By using NYTimes.com, you are agreeing to our [Terms of Service](#).

#### Scope

The New York Times privacy highlights and full Privacy Policy (available at: [www.nytimes.com/ref/membercenter/help/privacy.html](http://www.nytimes.com/ref/membercenter/help/privacy.html)) apply to the New York Times Web sites listed below, and to services that display or link to this notice.

- [NYTimes.com](#)
- [The New York Times Home Delivery](#)
- [The New York Times Store](#)
- [The New York Times Learning Network](#)

The New York Times Electronic Edition, which is maintained by NewsStand, maintains its own [Privacy Statement](#). The New York Times advertising portal, for advertisers of The Times, also maintains a separate [Privacy Policy](#).

#### Information We Gather

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#### Use of Information

- If you have registered online to one of our sites, The New York Times will not sell, rent, swap or authorize any third party to use your e-mail address without your permission. This also applies to any information that personally identifies you, except as noted immediately below. We do, however, share information about our audience in aggregate form. For example, we may want to know how long the average reader spends on our site, or which pages or features get the most attention.
- If you are a print subscriber to The New York Times newspaper and subscribed either by mail, phone or online, we may exchange or rent your name and mailing address (but not your e-mail address) with other reputable companies that offer marketing information or products through direct mail. If you prefer that we do not share this information, you may [opt-out](#).
- NYTimes.com may share personal information with The New York Times Company for analysis purposes. NYTimes.com will not share personal information about you as an individual to third parties without your consent.
- The New York Times may perform statistical analyses of subscribers and their subscribing and purchasing patterns for product development purposes and to generally inform advertisers about the nature of our subscriber base.
- We may use demographic and preference information to allow advertising on our Web sites to be targeted, in aggregate, to the users for whom they are most pertinent.
- We contract with other companies to provide services on our behalf, including credit-card and billing processing, shipping, e-mail distribution, list processing and analytics or promotions management.
- Any information you disclose when posting to a message board, along with your message board screen name or ID, becomes public and may be used by The New York Times for online and offline promotional or commercial uses in any and all media.
- [More](#).

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To view and edit your personal information, please visit the appropriate part of any of our Web sites. For example, to update your e-mail address on NYTimes.com, go to the [E-Mail Preferences page](#) in Member Center. For more information on how to view and edit your personal information, [click here](#).

#### Important Information

We encourage you to read our complete [Privacy Policy](#). The full New York Times Privacy Policy contains links to supplementary information about specific New York Times sites or services. We reserve the right to update our Privacy Policy.

Our Privacy Policy may be amended from time to time. Any such changes will be posted on our [main Privacy Policy page](#). If we make a significant or material change in the way we use your personal information, the change will be posted thirty (30) days prior to taking effect and registered users will be notified via e-mail.

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## The New York Times Privacy Policy

*Last Updated on July 1, 2009*

This Privacy Policy discloses the privacy practices for The New York Times newspaper and NYTimes.com. For the purposes of this Privacy Policy, unless otherwise noted, all references to “The New York Times” include NYTimes.com and The New York Times newspaper.

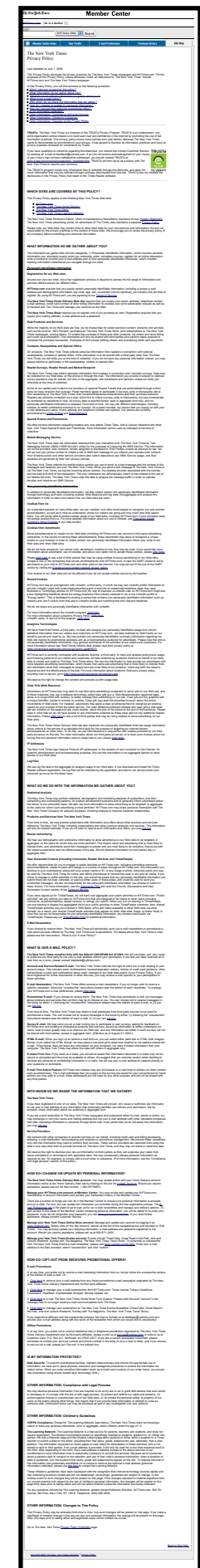
In this Privacy Policy, you will find answers to the following questions:

- [Which sites are covered by this policy?](#)
- [What information do we gather about you?](#)
- [What do we do with the information we gather about you?](#)
- [What is our e-mail policy?](#)
- [With whom do we share the information that we gather?](#)
- [How do I change or update my personal information?](#)
- [How do I opt-out from receiving promotional offers?](#)
- [Is my information protected?](#)
- [Other information: Compliance with legal process](#)
- [Other information: Children's Guidelines](#)
- [Other information: Changes to this Privacy Policy](#)

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If you have questions or concerns regarding this statement, you should first contact Customer Service by sending an e-mail to [feedback@nytimes.com](mailto:feedback@nytimes.com). If you do not receive acknowledgment of your inquiry or your inquiry has not been satisfactorily addressed, you should contact TRUSTe at [www.truste.org/consumers/watchdog\\_complaint.php](http://www.truste.org/consumers/watchdog_complaint.php). TRUSTe will then serve as a liaison with The New York Times to resolve your concerns.

The TRUSTe program covers only information that is collected through this Web site, and does not cover information that may be collected through software downloaded from this site. TRUSTe has not certified the disclosures in this Privacy Policy that relate to the Times Reader software.



Please keep in mind that any opt-out choices you make will not apply in situations where (a) you either have made, simultaneously make, or later make a specific request for information from a member of The Acme Family of Companies, (b) The Acme Family of Companies uses your personal information for either "Operational Uses" or "Fulfillment Uses" (as described above in A3), (c) you either have engaged, simultaneously engage, or later engage in either Non-Registered Transactions or Sponsored Activities (as described above in A3), or (d) The Acme Family of Companies shares your personal information under the provisions of A3 above with respect to "Companies That Facilitate Communications and Transactions With You," "Companies That You Previously Authorized to Obtain Your Information," "Purchase or Sale of Businesses," or "Disclosures to Comply with Laws and Disclosures to Help Protect the Security and Safety of Our Web Sites, The Acme Family of Companies and Others." Also, any opt-out choices you make will not apply to personal information that you provide

this is what consumers  
are up against.



design of a  
**“nutrition label”**  
for privacy

# PLATFORM FOR PRIVACY PREFERENCES (**P3P**)

# 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



```

51 <!-- Consequence -->
52 <CONSEQUENCE>
53 We collect personal information to provide you with a safe, smooth, efficient, and
  · customized experience. We use "cookies" on certain of our pages to help analyze our
  · web page flow; customize our services, content and advertising; measure promotional
  · effectiveness, and promote trust and safety. We use your personal information to
  · provide the service and customer support you request; resolve disputes, collect
  · fees, and troubleshoot problems; prevent potentially prohibited or illegal
  · activities, and enforce our User Agreement; customize, measure, and improve our
  · services, content and advertising; tell you about targeted marketing, service
  · updates, and promotional offers based on your communication preferences; and compare
  · information for accuracy, and verify it with third parties.</CONSEQUENCE>
54
55 <!-- Use (purpose) -->
56 <PURPOSE><admin/><contact required="opt-out"/><current/><develop/><pseudo-
  · analysis/><pseudo-decision/><individual-analysis/><individual-decision/><tailoring/
  · ><telemarketing required="opt-out"/></PURPOSE>
57
58 <!-- Recipients -->
59 <RECIPIENT><ours/><other-recipient required="opt-in"/></RECIPIENT>
60
61 <!-- Retention -->
62 <RETENTION><indefinitely/></RETENTION>
63
64 <!-- Base dataschema elements. -->
65 <DATA-GROUP>
66 <DATA ref="#dynamic.miscdata"><CATEGORIES><physical/></CATEGORIES></DATA>
67 <DATA ref="#dynamic.miscdata"><CATEGORIES><online/></CATEGORIES></DATA>
68 <DATA ref="#dynamic.miscdata"><CATEGORIES><uniqueid/></CATEGORIES></DATA>
69 <DATA ref="#dynamic.miscdata"><CATEGORIES><purchase/></CATEGORIES></DATA>
70 <DATA ref="#dynamic.miscdata"><CATEGORIES><computer/></CATEGORIES></DATA>
71 <DATA ref="#dynamic.miscdata"><CATEGORIES><navigation/></CATEGORIES></DATA>

```



# P3P

A Policy is composed of Statements

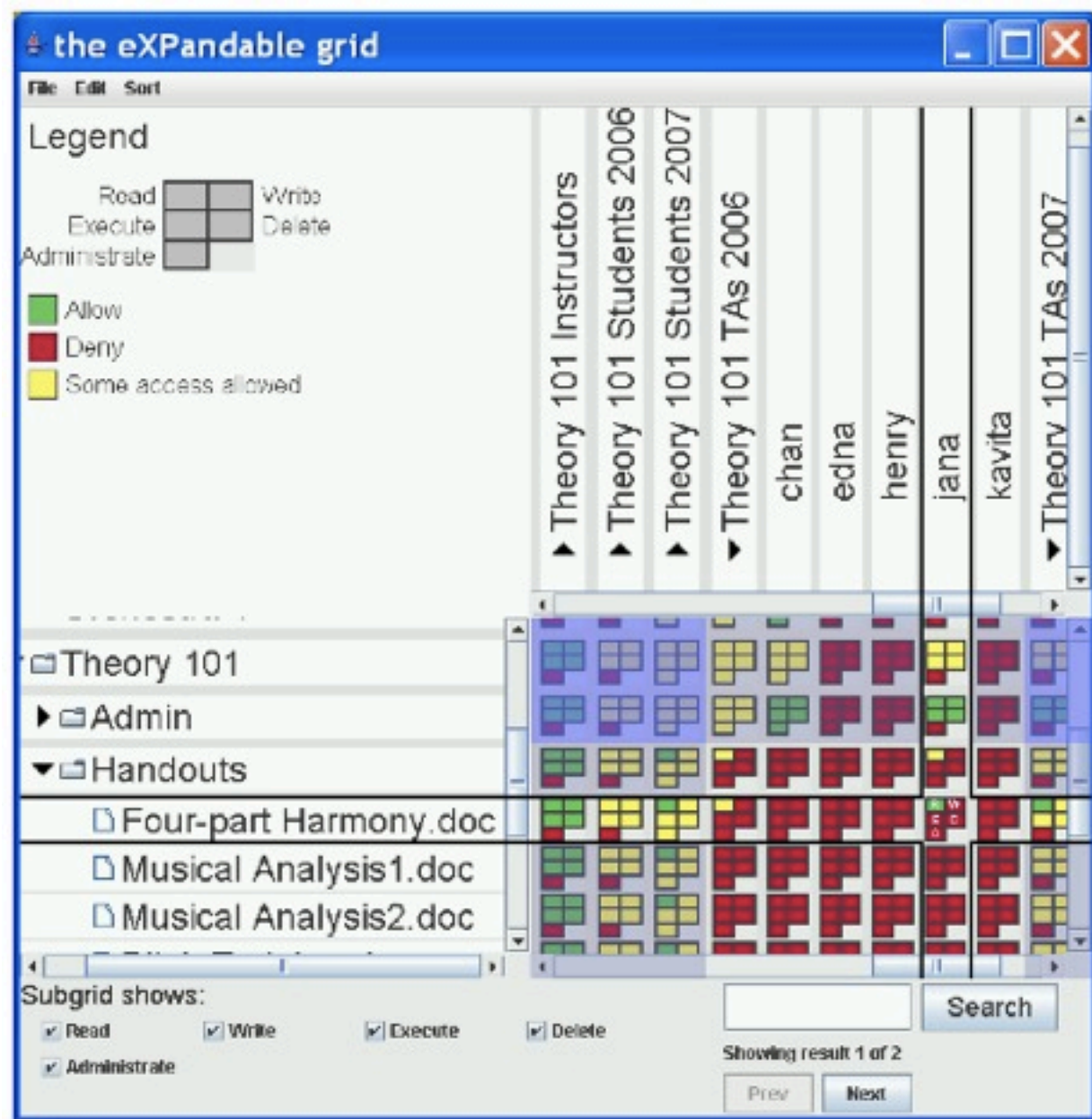
Statements have triples of information:

<statement>

<purpose> admin, current, develop,...

<recipient> ours, other, public,...

<data> physical, cookies, computer,...



Robert Reeder, et al. Expandable Grids for Visualizing and Authoring Computer Security Policies. WPES 2008.

**Whole policy.** The Grid shows the whole policy, including principal/resource combinations for which there is no explicit rule.

**Effective policy.** The Grid shows the effective policy, while Windows merely shows component rules.

**Group membership information.** The Grid integrates group membership information into the file permissions display, while Windows puts it in a separate application from the file permissions interface.

**Simple changes.** The Grid requires a simple click on a colored box to change a permission, while the Windows interface requires adding a new rule to its list.

**New policy semantics.** The Grid's new policy semantics allows for easy conflict resolution by simply clicking on a colored box, the same way any other policy change would be made.

**Visual pop-out.** The Grid allows for easy detection of anomalous permissions that visually pop out from the rest of the policy display.


# ACME Privacy Policy


[Contact Site](#)


## WHO may use your information


## HOW your information may be used


Hide Unused Information 



 Information **not** used

 Information may be used

 May be used, **only if you request this**

 May be used, **unless you [opt-out](#)**

 Expand the column for more information

  Some information may be used - **expand for details**

opt-in opt-out

Companies who help us

click for more...

Other companies

click for more...

People who read your public postings

click for more...

Provide service and maintain site

click for more...

Research & Development

click for more...

Profiling

Analysis

- not linked to you
- linked to you

Decisions affecting you

- not linked to you
- linked to you

Marketing


- Postal, email, etc.
- Telemarketing

Other

click for more...


### 1. Access log and cookies


Our Web server collects access logs and cookies. A cookie is a small data file that we transfer to your computer's hard drive through your web browser when you visit our sites. Cookies enable our systems to recognize your computer, so that we can provide you with personalized information and features. We also use cookies to track user traffic patterns. **Retention Time: Indefinitely**

 Types of Information Collected


### 2. Ordering Books and Conferences


We collect information in order to process your purchase. If you register for an Acme conference, or sign up for a conference email list, we will send you email announcements and updates about Acme conferences. We send conference brochures to past conference attendees. **Retention Time: Indefinitely**

 Types of Information Collected


 Name, address, phone number, etc.


 User Information

 Name

 Home Contact Information


 Business Contact Information

 Email address, online contact info

 Web Browsing Information

Cookies (optional)

 User Information

 Third Party Information

# CAN WE CREATE A BETTER DESIGNED PRIVACY POLICY?

*Easy to understand*

*Fast to find information*

*Easy to compare*

*More enjoyable*



# Nutrition Facts

Serving Size 1 cup (228g)  
Serving Per Container 2

## Amount Per Serving

Calories 250      Calories from Fat 110

% Daily Value\*

Total Fat	12g	18%
Saturated Fat	3g	15%
Cholesterol	30mg	10%
Sodium	470mg	20%
Total Carbohydrate	31g	10%
Dietary Fiber	0g	0%
Sugars	5g	
Protein	5g	

Vitamin A	4%
Vitamin C	2%
Calcium	20%
Iron	4%

\* Percent Daily Values are based on a 2,000 calorie diet.  
Your Daily Values may be higher or lower depending on your calorie needs:

	Calorie	2,000	2,500
Total Fat	Less than	65g	80g
Sat Fat	Less than	20g	25g
Cholesterol	Less than	300 mg	300mg
Sodium	Less than	2,400 mg	2,400 mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

LOW

**Fat**  
7.7g per serving

LOW

**Saturates**  
2.0g per serving

HIGH

**Sugars**  
42.2g per serving

MED

**Salt**  
2.0g per serving



**WARNING:**  
**CHOKING HAZARD**  
This toy is a small ball.  
Not for children under 3 yrs.

Based on standard U.S. Government tests

# ENERGYGUIDE

Refrigerator-Freezer  
With Automatic Defrost  
With Side-Mounted Freezer  
Without Through-the-Door-Ice Service

XYZ Corporation  
Model ABC-W  
Capacity: 23 Cubic Feet

**Compare the Energy Use of this Refrigerator with Others before You Buy.**

This Model Uses  
776 kWh/year

Energy Use (kWh/year) range of all similar models

Uses Least  
Energy  
742

Uses Most  
Energy  
836

kWh/year (kilowatt-hours per year) is a measure of energy (electricity) use.  
Your utility company uses it to compute your bill. Only models with 22.5 to 24.4 cubic feet and the above features are used in this scale.

Refrigerators using more energy cost more to operate.  
This model's estimated yearly operating cost is:

**\$68**

Based on a 1992 U.S. Government national average cost of 8.24¢ per kWh for electricity. Your actual operating cost will vary depending on your local utility rates and your use of the product.

Important: Removal of this label before purchase is a violation of Federal law (42 U.S.C. 6295).

## Drug Facts

### Active ingredient (in each tablet)

Chlorpheniramine maleate 4 mg.....Antihistamine

### Purpose

**Uses** temporarily relieves these symptoms due to hay fever or other upper respiratory allergies: ■ sneezing ■ runny nose ■ itchy, watery eyes ■ itchy throat

### Warnings

Ask a doctor before use if you have

- glaucoma ■ a breathing problem such as emphysema or chronic bronchitis
- trouble urinating due to an enlarged prostate gland

Ask a doctor or pharmacist before use if you are taking tranquilizers or sedatives

When using this product

- you may get drowsy ■ avoid alcoholic drinks
- alcohol, sedatives, and tranquilizers may increase drowsiness
- be careful when driving a motor vehicle or operating machinery

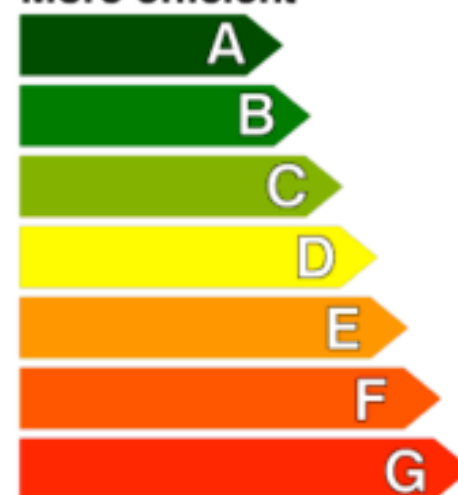


# Energy

Manufacturer  
Model

Washing  
machine

More efficient



Less efficient

Energy consumption

**1.75**

# Nutrition Labeling

## Sample Label for Macaroni and Cheese

**Start Here**

**Limit these  
Nutrients**

**Get Enough  
of these  
Nutrients**

**Footnote**

### **Nutrition Facts**

Serving Size 1 cup (228g)  
Servings Per Container 2

Amount Per Serving

Calories 250

Calories from Fat 110

% Daily Value\*

Total Fat 12g	18%
Saturated Fat 3g	15%
Trans Fat 1.5g	
Cholesterol 30mg	10%
Sodium 470mg	20%
Total Carbohydrate 31g	10%
Dietary Fiber 0g	0%
Sugars 5g	
Protein 5g	
Vitamin A	4%
Vitamin C	2%
Calcium	20%
Iron	4%

\* Percent Daily Values are based on a 2,000 calorie diet.  
Your Daily Values may be higher or lower depending on  
your calorie needs:

	Calories:	2,000	2,500
Total Fat	Less than	65g	80g
Sat Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

**Quick Guide  
to % DV**

**5% or less  
is low**

**20% or more  
is high**



# Gramm-Leach-Bliley Act (GLBA) 1999

## § 6803. Disclosure of institution privacy policy

### (a) Disclosure required

At the time of establishing a customer relationship with a consumer and **not less than annually during the continuation of such relationship, a financial institution shall provide a clear and conspicuous disclosure to such consumer**, in writing or in electronic form or other form permitted by the regulations prescribed under section 6804 of this title, of such financial institution's policies and practices with respect to—

- (1) disclosing nonpublic personal information to affiliates and nonaffiliated third parties, consistent with section 6802 of this title, including the categories of information that may be disclosed;
- (2) disclosing nonpublic personal information of persons who have ceased to be customers of the financial institution; and
- (3) protecting the nonpublic personal information of consumers.



Kleimann Communication Group

*Evolution of a Prototype  
Financial Privacy Notice*

February 2006

**Chapter 4. Focus Groups in Baltimore, Maryland** discusses the baseline information we collected in two focus groups. These results produced the first versions of the prototype.

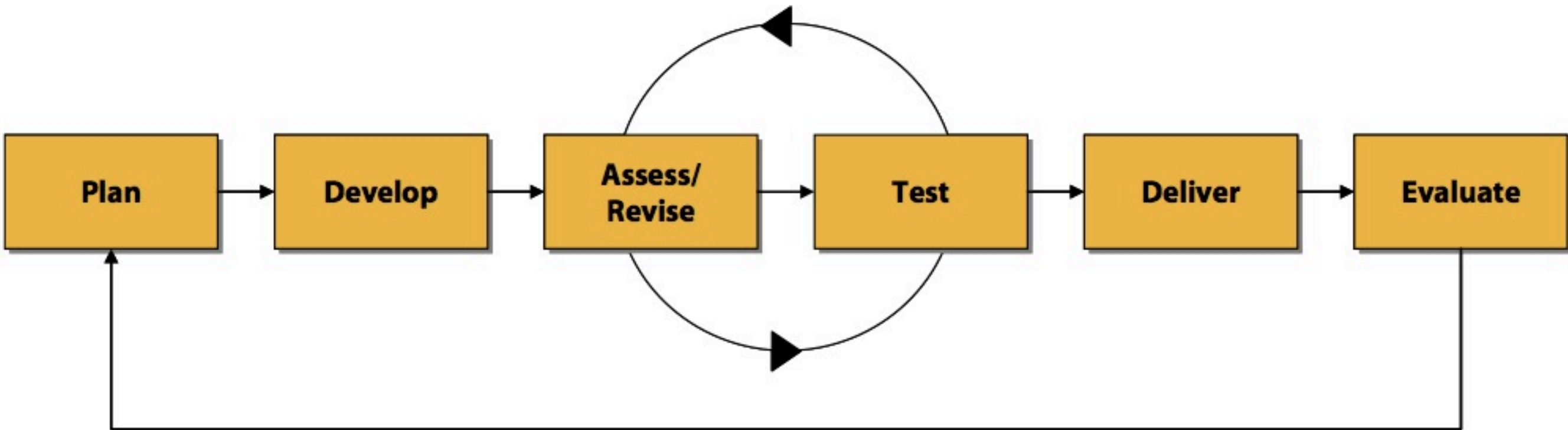
**Chapter 5. Preference Testing in Washington, DC** reports the results of a series of interviews in which we asked consumers about language, titles, and ordering.

**Chapter 6. Pretest in Baltimore, Maryland** discusses the failures of the initial designs with consumers and the importance of providing sufficient context for them to understand the disclosure information.

**Chapter 7. Diagnostic Usability Testing in San Francisco, California** discusses the first workable version of the prototype and the consumer issues that arose as consumers compared sharing practices using the prototype.

**Chapter 8. Diagnostic Usability Testing in Richmond, Virginia** discusses the further validation of the prototype used in San Francisco and suggestions for additional changes to the prototype. We also identify emerging consumer issues.

**Kleimann Communication Group's Information Design Model**



Plan	Develop	Assess/ Revise	Test	Deliver	Evaluate
Conduct a needs analysis to identify <ul style="list-style-type: none"><li>▪ Audience</li><li>▪ Task</li><li>▪ Context</li><li>▪ Purpose</li><li>▪ Logistics</li><li>▪ Issues</li><li>▪ Political and policy concerns</li></ul>	Develop the documents, using information from the needs analysis.	Assess the documents internally to see how they work and make revisions based on this review.	Test the documents for usability with targeted user groups to find out what is working and what is not.	Deliver the documents in the most user-centered format.	Evaluate the short-term and long-term effectiveness of the documents.

RQ 1: What are participants' attitudes and general level of knowledge about privacy notices before looking at the initial designs?

**Many participants thought that the font size of the privacy notices they'd received in the past from their financial institutions discouraged them from reading the notices.**

*“I’ve got to put two pair[s] of reading glasses on in order to see the print. And I get frustrated and just, well [assume] if it’s anything important they’ll let me know and [I] throw it away.” (Focus Group 2)*

**Participants in both focus groups mistakenly thought that all financial institutions share information in the same way and, therefore, all privacy notices say the same thing.**

*“I mean banks and institutions are governed by the government, so shouldn’t the policies pretty much be the same”? (Focus Group 1)*

F A C T S

WHAT DOES NEPTUNE DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

■ Social Security number and income

■ account balances and payment history

■ credit history and credit scores

When you close your account, we continue to share information about you according to our policies.

How?

All financial companies need to share customers’ personal information to run their everyday business—to process transactions, maintain customer accounts, and report to credit bureaus. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons Neptune chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Neptune share?	Can you limit this sharing?
For our everyday business purposes—to process your transactions, maintain your account, and report to credit bureaus	Yes	No
For our marketing purposes—to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates’ everyday business purposes—information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes—information about your creditworthiness	Yes	Yes (Check your choices, p. 3)
For our affiliates to market to you	Yes	Yes (Check your choices, p. 3)
For nonaffiliates to market to you	Yes	Yes (Check your choices, p. 3)

Contact Us

Call 1-800-XXX-XXXX or go to [www.neptune.com/privacy](http://www.neptune.com/privacy)

p. 1 of 3

p. 1 of 3

**Do not change**

**Instructions**

**Possible types of information they collect**

**Purpose of the policy**

**Will they share your information “for this purpose”**

**Can you opt-out?**

**Contact information**



# Privacy Facts

What does *ACME Corporation* do with Your Personal Information?

**WHAT** information do they collect?

**Information about your interactions with this site**

including information about your computer and pages you visited on this website

**Your social and economic categories or group memberships**

**Your contact information (optional)**

including your email address and your phone number

**Financial or purchase information**

**HOW** do they use your information?

Can you limit this use?

**For everyday business purposes–**

to process your transaction, administer our site, or customize our site for you

No

**For marketing purposes–**

to offer products and services to you (but not through telemarketing)

**Yes**

(check your [choices](#) below)

**For profiling purposes–**

to do analysis with your data, both linked and not linked to you

This is only used on  
your request

**WHO** may your information be shared with?

Can you limit this sharing?

**Our company and companies who help us.**

**Companies who have similar policies to ours**

No

**CONTACT US**

Call 1-800-898-9698 or go to [www.acme.com/privacy](http://www.acme.com/privacy)

If you want to limit your sharing please contact us by telephone, go online to our full policy,  
send us [this form](#) by mail, or use our [opt-out page here](#).

What we collect	How we use your information						Who shares your information	
	Provide service and maintain site	Research and development	Marketing	Telemarketing	Profiling not linked to you	Profiling linked to you	Other companies	Public forums
Contact information	!	!	OUT	OUT	!	!	in	
Content	!	!	OUT	OUT	!	!	in	!
Cookies	!	!	OUT	OUT		!	in	
Demographic information	!	!	OUT	OUT		!	in	
Social security no. and gov't ID	!							
Preferences	!	!	OUT	OUT		!	in	!
Purchase and financial data	!	!	OUT	OUT	!	!	in	
Web browsing information	!	!	OUT	OUT		!	in	!
Unique identifiers	!	!	OUT	OUT		!	in	!

## Understanding this privacy report



Data is collected and used in this way.



You can opt-out of this data use.



Your data will not be used in this way unless you opt-in.



You can opt-in or opt-out of some uses of this data.

# The Acme Policy

types of information	how we use your information					who we share your information with	
	provide service & maintain site	research & development	marketing	telemarketing	profiling	other companies	public forums
contact information	!	!	OUT	OUT	—	IN	—
cookies	!	!	OUT	OUT	—	IN	—
demographic information	—	—	—	—	—	—	—
financial information	—	—	—	—	—	—	—
health information	—	—	—	—	—	—	—
preferences	!	!	OUT	OUT	—	IN	!
purchasing information	!	!	OUT	OUT	—	IN	—
social security number & govt ID	!	—	—	—	—	—	—
your activity on this site	!	!	OUT	OUT	—	IN	!
your location	—	—	—	—	—	—	—

# User Testing

## **5 focus groups**

- 7-11 participants each
- explored attitudes towards privacy policies
- tested understanding of labels and symbols

# Focus Group Script

## **Introduction**

The purpose of this focus group is to figure out how we can change an existing design to make it easier to understand. I'll pass out copies of the design and then we can talk about the things that are confusing. If there's anything that doesn't make sense to you then please talk about it; it will help us make the design better. We're interested in as many points of view as possible. We will never use your names outside of today's exercise.

I'd like to stress that we're not testing you; we're trying to make the design better.



# Focus Group Script

## **Background Questions**

Before I pass out the design I'm going to ask a few questions about privacy online:

A privacy policy is the link at the bottom of most websites that says "Privacy Policy". Raise your hand if you've ever read a privacy policy online before. Those with your hands raised: why did you read the policy?

Those who didn't raise your hands: imagine you were going to read a privacy policy online. What would you look for?

# Focus Group Script

## **Privacy Policy Mark-Up**

*Pass out privacy policy*

Please carefully look-over the design and without talking circle any words, phrases or symbols that aren't clear to you or that you find confusing.

*Allow several minutes*

# Focus Group Script

## **Privacy Policy Discussion**

*Encourage a group conversation, and ask prompting questions when the discussion slows.*

Now we're going to talk about the things that were confusing or unclear about the design. Can anyone share something that they were confused about? Was anyone else confused about that? Did someone have an idea of what it means?

*Sample Prompting Question: Was anyone confused about this symbol (point to the opt out symbol)?  
What does this mean and how does it affect you?*

# The Acme Policy

## how we use your information

types of information	provide service & maintain site	research & development	marketing
contact information	!	!	!
cookies	!	!	!
demographic information	—	—	—
financial information	—	—	—
health information	—	—	—
preferences	!	!	!
purchasing information	!	!	!
social security number & govt ID	!	—	—
your activity on this site	!	!	!
your location	—	—	—

# Button Co.

## how we use your information

types of information	provide service & maintain site	research & development	marketing	telemarketing	profiling	other companies	public forums
contact information	!	!	OUT	OUT	!	OUT	—
cookies	!	!	OUT	OUT	!	OUT	—
demographic information	!	!	OUT	OUT	!	OUT	!
financial information	—	—	—	—	—	—	—
health information	—	—	—	—	—	—	—
preferences	—	—	—	—	—	—	—
purchasing information	!	!	—	—	—	—	—
social security number & govt ID	!	—	—	—	—	—	—
your activity on this site	!	!	OUT	OUT	!	OUT	!
your location	—	—	—	—	—	—	—

## who we share your information with

Allows for information to be found in the same place every time

# The Acme Policy

types of information	how we use your information					who we share your information with	
	provide service & maintain site	research & development	marketing	telemarketing	profiling	other companies	public forums
contact information	!	!	OUT	OUT	—	IN	—
cookies	!	!	OUT	OUT	—	IN	—
demographic information	—	—	—	—	—	—	—
financial information	—	—	—	—	—	—	—
health information	—	—	—	—	—	—	—
preferences	!	!	OUT	OUT	—	IN	!
	!	!	OUT	OUT	—	IN	—
	—	—	—	—	—	—	—
	!	!	OUT	OUT	—	IN	!
your location	—	—	—	—	—	—	—

Removes wiggle room and complicated terminology by using four standard symbols



The Acme Policy							
types of information	how we use your information					who we share your information with	
	provide service & maintain site	research & development	marketing	telemarketing	profiling	other companies	public forums
contact information	!	!	OUT	OUT	▬	IN	▬
cookies	!	!	OUT	OUT	▬	IN	▬
demographic information	▬	▬	▬	▬	▬	▬	▬
financial information	▬	▬	▬	▬	▬	▬	▬
health information	▬	▬	▬	▬	▬	▬	▬
preferences	!	!	OUT	OUT	▬	IN	!
purchasing information	!	!	OUT	OUT	▬	IN	▬
social security number & govt ID	!	▬	▬	▬	▬	▬	▬
your activity on this site	!	!	OUT	OUT	▬	IN	!
your location	▬	▬	▬	▬	▬	▬	▬

Allows for quick high-level visual feedback by looking at the overall intensity of the page

# The Acme Policy

types of information	how we use your information					who we share your information with	
	provide service & maintain site	research & development	marketing	telemarketing	profiling	other companies	public forums
contact information	!	!	OUT	OUT	—	IN	—
cookies	!	!	OUT	OUT	—	IN	—
information	—	—	—	—	—	—	—
health information	—	—	—	—	—	—	—
preferences	!	!	OUT	OUT	—	IN	!
purchasing information	!	!	OUT	OUT	—	IN	—
social security number & govt ID	!	—	—	—	—	—	—
your activity on this site	!	!	OUT	OUT	—	IN	!
your location	—	—	—	—	—	—	—

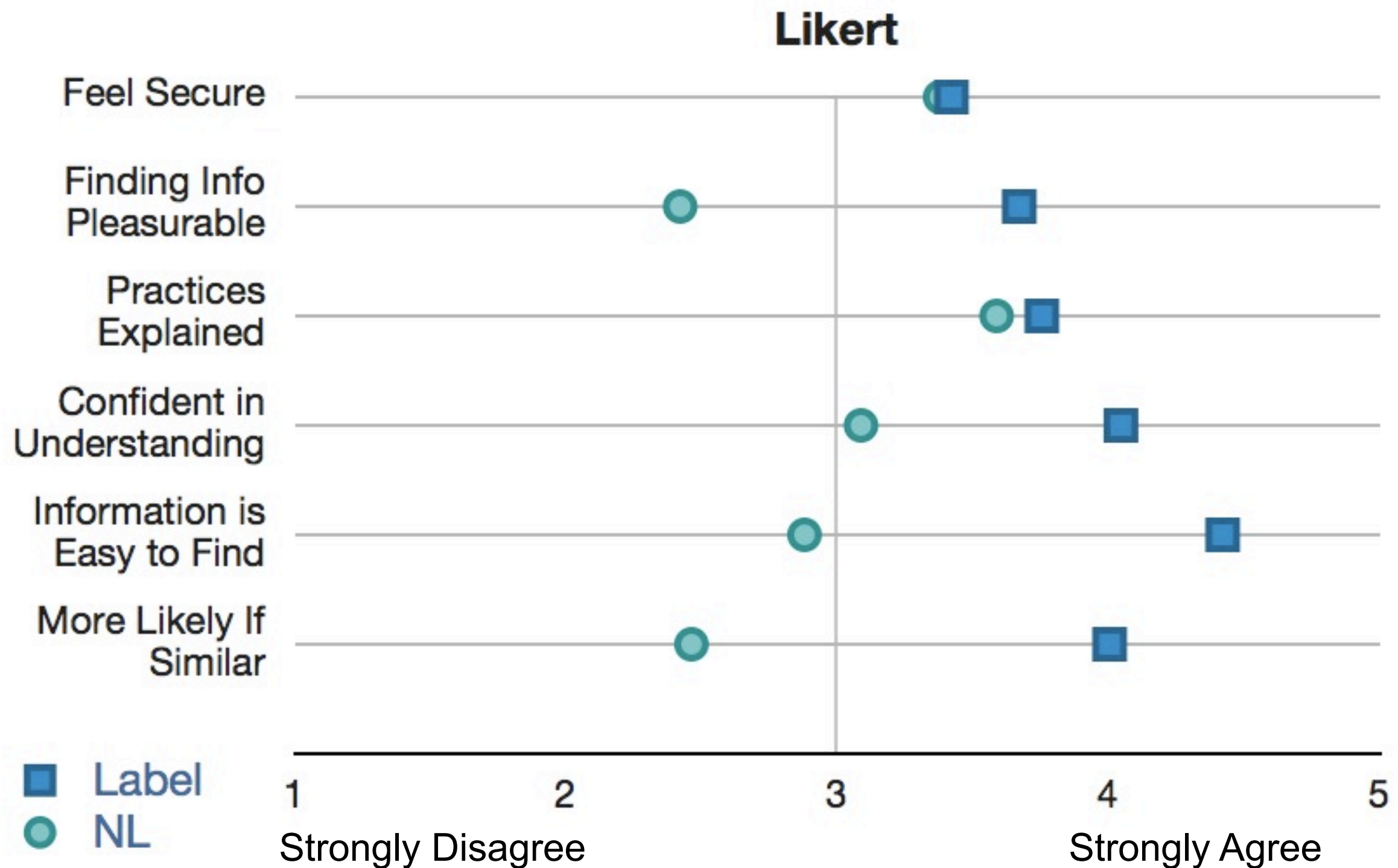
Can be printed, fits in a standard browser window

# User Testing

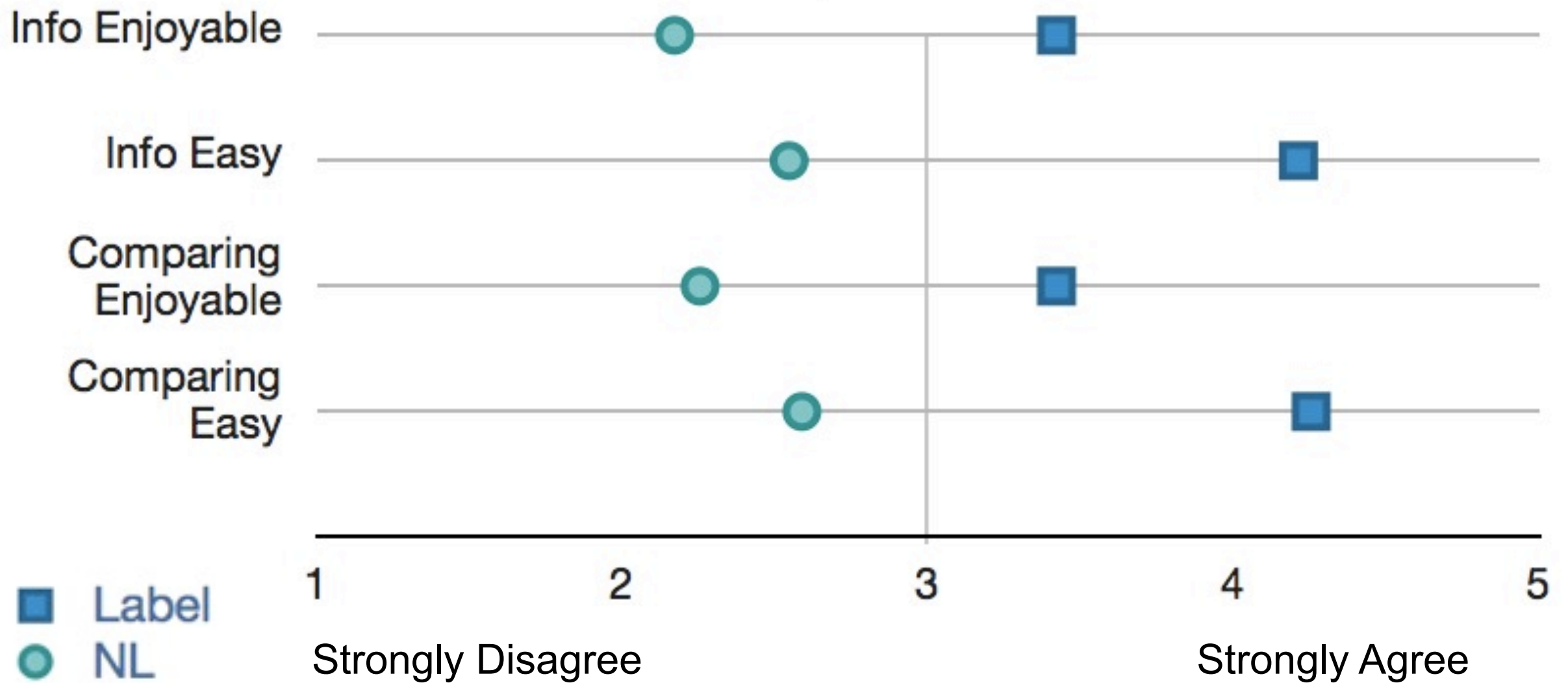
## Laboratory Study

- 24 participants
- within subjects design to compare label and text policies
- 8 tasks, measured time and accuracy
- 6 opinion questions

# Like-ability Results



# Comparison Like-ability Results





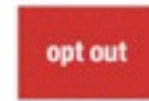
# The final label design we have proposed here:

- Allows for information to be found in the same place every time
- Removes wiggle room and complicated terminology by using four standard symbols
- Allows for quick high-level visual feedback by looking at the overall intensity of the page
- Can be printed, fits in a standard browser window
- And most importantly people who have used it to find privacy information have rated it as not just more pleasurable than text, but actually enjoyable

# Amazon Privacy Policy



we **will** collect and use your information in this way



by default, we **will** collect and use your information in this way unless you tell us not to by opting out



we **will not** collect and use your information in this way



by default, we **will not** collect and use your information in this way unless you allow us to by opting in

## how we use your information

## who we share your information with

types of information	provide service & maintain site	research & development	marketing	telemarketing	profiling	other companies	public forums
contact information	!	!	opt out	opt out		opt in	
cookies	!	!	opt out	opt out		opt in	
demographic information							
financial information							
health information							
preferences	!	!	opt out	opt out		opt in	!
purchasing information	!	!	opt out	opt out		opt in	
social security number & govt ID	!						
your activity on this site	!	!	opt out	opt out		opt in	!
your exact location							

# The Acme Policy

types of information	how we use your information				who we share your information with	
	provide service and maintain site	marketing	telemarketing	profiling	other companies	public forums
contact information	!	opt out	opt out		opt in	
cookies	!	opt out	opt out		opt in	
demographic information						
financial information						
health information						
preferences	!	opt out	opt out		opt in	!
purchasing information	!	opt out	opt out		opt in	
social security number & gov't ID	!					





we **will** collect and use your information in this way

**opt out**

by default, we **will** collect and use your information in this way unless you tell us not to by opting out



we **will not** collect and use your information in this way

**opt in**

by default, we **will not** collect and use your information in this way unless you allow us to by opting in

---

## Definitions

### **contact information**

Contact information may include name, address, phone number, email address, or other online or physical contact information.

### **cookies**

Cookies or mechanisms that perform similar functions. A cookie is a small text file that a website can place on your computer's hard drive to collect information about your activities on the site or to allow the site to remember information about you and your activities.

### **demographic information**

Demographic information may include social and economic categories that apply to you, such as your gender, age, income, or where you are from.

### **financial information**

### **provide service and maintain site**

Collecting information to provide the service you requested, to customize the site for your current visit, to perform web site and system maintenance, or to enhance, evaluate, or otherwise review the site, but without connecting any information to you.

### **public forums**

A public area, such as a bulletin board, chat room, or directory.

### **purchasing information**

Information about your purchases may include the payment methods you used.

### **social security number & govt ID**

Includes government-issued identifiers such as your social security number.

# CAN WE CREATE A BETTER DESIGNED PRIVACY POLICY?

*Easy to understand*

*Fast to find information*

*Easy to compare (claimed)*

*More enjoyable*



# User Testing

## Mechanical Turk

- 789 participants
- **between** subjects design to compare standardized label and text policies

	Std. Table	Std. Short Table	Std. Short Text	Full Policy Text	Layered Text
A	105	84	88	88	
B	90	88	90	77	79

# Acme

information we collect	ways we use your information				information sharing	
	provide service and maintain site	marketing	telemarketing	profiling	other companies	public forums
contact information		opt out	opt out			
cookies						
demographic information		opt out	opt out			
financial information						
health information						
preferences		opt out	opt out			
purchasing information		opt out	opt out			
social security number & gov't ID						
your activity on this site		opt out	opt out			
your location						

#### Access to your information

This site gives you access to your contact data and some of its other data identified with you

**How to resolve privacy-related disputes with this site**  
Please email our customer service department

acme.com  
5000 Forbes Avenue  
Pittsburgh, PA 15213 United States  
Phone: 800-555-5555  
help@acme.com

# Acme

information we collect	ways we use your information				information sharing	
	provide service and maintain site	marketing	telemarketing	profiling	other companies	public forums
contact information		opt out	opt out			
cookies						
demographic information		opt out	opt out			
preferences		opt out	opt out			
purchasing information		opt out	opt out			
your activity on this site		opt out	opt out			

**Information not collected or used by this site:** social security number & government ID, financial, health, location.

#### Access to your information

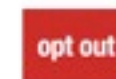
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we will collect and use your information in this way



by default, we will collect and use your information in this way unless you tell us not to by opting out



we will not collect and use your information in this way



by default, we will not collect and use your information in this way unless you allow us to by opting in

# Acme

Acme will collect your contact information. They will use this information for providing you service and maintaining the site and profiling. They will also use this information for marketing and telemarketing unless you opt out. They will share this information with other companies unless you opt out. They will share this information on public forums if you opt in.

Acme will collect your activity on this site, demographic information, your health information, and cookie information. They will use this information for providing you service and maintaining the site and profiling. They will also use this information for marketing and telemarketing unless you opt out. They will not share this information.

Acme will collect your preferences and your purchase information. They will use this information for providing you service and maintaining the site and profiling. They will also use this information for marketing and telemarketing unless you opt out. They will share this information on public forums if you opt in.

**Information not collected or used by this site:**  
financial, SSN or government ID, and location.

**Access to your information**

This site gives you access to your contact data and some of its other data identified with you

**How to resolve privacy-related disputes with this site**  
Please email our customer service department

acme.com  
5000 Forbes Avenue  
Pittsburgh, PA 15213 United States  
Phone: 800-555-5555  
help@acme.com



# Acme Privacy Notice Highlights

(last updated May 2008)



## Scope

This notice provides highlights of the full [Acme Online Privacy Statement](#). This notice and the full privacy statement apply to those Acme Web sites and services that display or link to this notice.

## Personal Information

- When you register for certain Acme services, we will ask you to provide personal information.
- The information we collect may be combined with information obtained from other Acme services and other companies.
- We use cookies and other technologies to keep track of your interactions with our sites and services to offer a personalized experience.

## Your Choices

- You can stop the delivery of promotional e-mail from a Acme site or service by following the instructions in the e-mail you receive.
- To make proactive choices about how we communicate with you by e-mail, telephone, and postal mail, follow the instructions listed in the [Communication Preferences](#) of the full privacy statement.
- To opt-out of the display of personalized advertisements, go to the [Display of Advertising](#) section of the full privacy statement.
- To view and edit your personal information, go to the [access section](#) of the full privacy statement.

## Uses of Information

- We use the information we collect to provide the services you request. Our services may include the display of personalized content and advertising.
- We use your information to inform you of other products or services offered by Acme and its affiliates, and to send you relevant survey invitations related to Acme services.
- We do not sell, rent, or lease our customer lists to third parties. In order to help provide our services, we occasionally provide information to other companies that work on our behalf.

## Important Information

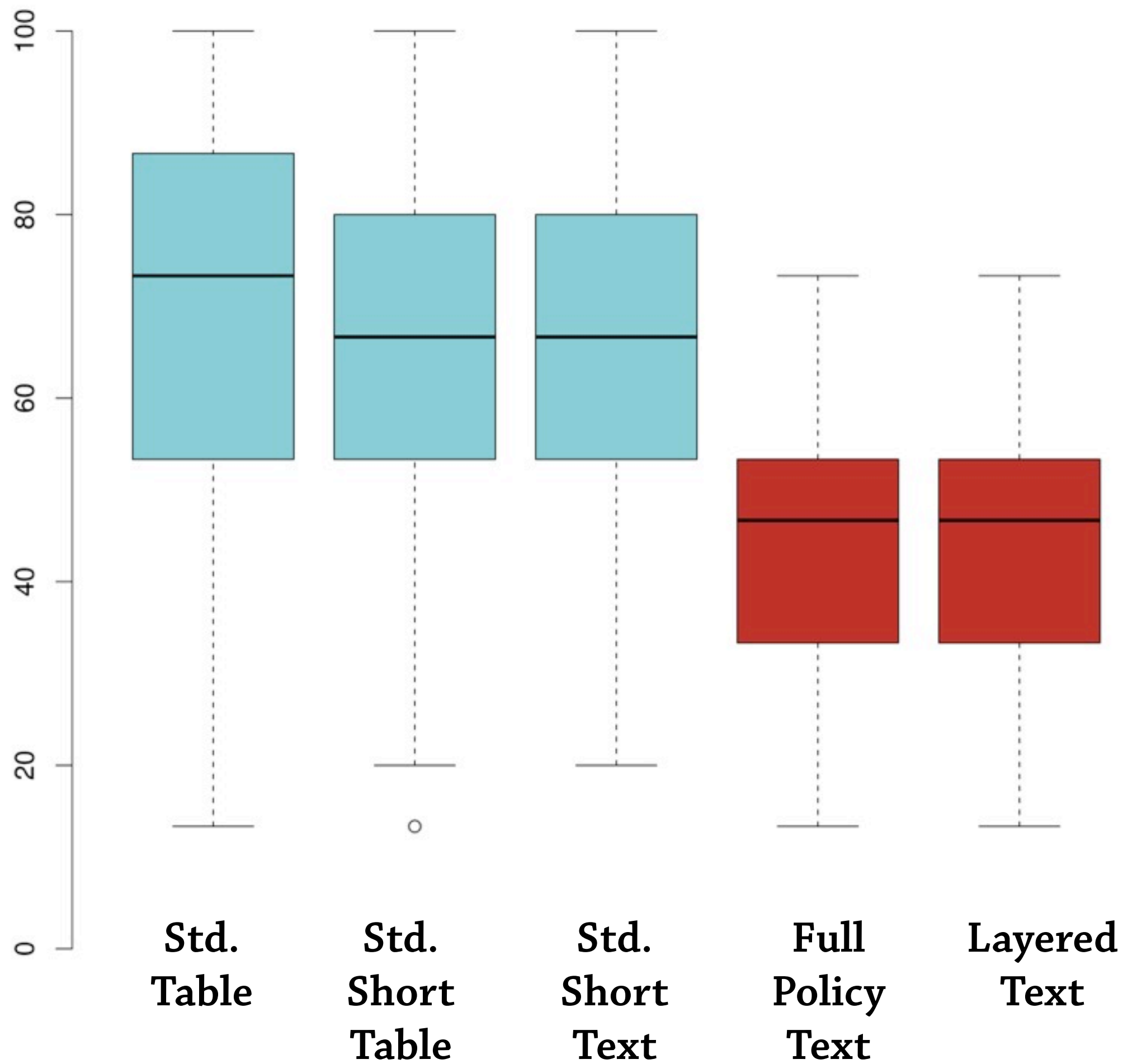
- The full [Acme Online Privacy Statement](#) contains links to supplementary information about specific Acme sites or services.
- The sign in credentials (e-mail address and password) used to sign in to most Acme sites and services are part of the [Acme Networks](#).
- For more information on how to help protect your personal computer, your personal information and your family online, visit our [online safety resources](#).
- Acme is a member of the [TRUSTe](#) privacy seal program.

## How to Contact Us

For more information about our privacy practices, go to the full [Acme Online Privacy Statement](#). Or write us using our [Web form](#). If you have a technical or general support question, please visit <http://support.Acme.com> to learn more about Acme Support offerings.

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# CAN WE CREATE A BETTER DESIGNED PRIVACY POLICY?

*Easy to understand*

*Fast to find information*

*Easy to compare*

*More enjoyable*

“ By providing a **fuller context** for the disclosure of information sharing characteristics by a particular institution, the part-to-whole display approach seems to help consumers focus on information sharing as important and differentiating features of financial institutions. ”

Levy-Hastak Report



<http://cups.cs.cmu.edu>

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