

17 – Usability of privacy policies and the dimensions of privacy notice

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w/ special guest Florian Schaub

March 17, 2015

05-436 / 05-836 / 08-534 / 08-734
Usable Privacy and Security

**Carnegie
Mellon
University**

CyLab



Engineering &
Public Policy



Notice and choice

Protect privacy by giving people control over their information

Notice about data collection and use

Choices about allowing their data to be collected and used in that way

Yahoo! Privacy Policy

Hi, Lorrie | Sign Out | Help

Make Y! home, help a school

YAHOO! PRIVACY

Home Products Topics Privacy Tools Help

YAHOO! PRIVACY CENTER

Welcome to the Yahoo! Privacy Center—take a look around. You'll learn how Yahoo! treats your personal information, along with ways to control your preferences and settings. As always, Yahoo! is committed to gaining your trust.

WHAT THIS PRIVACY POLICY COVERS

Information Collection and Use

Information Sharing and Disclosure

Cookies

Confidentiality and Security

Questions and Suggestions

WHAT THIS PRIVACY POLICY COVERS

Yahoo! takes your privacy seriously. Please read the following to learn more about our privacy policy.

The federal government and technology industry have developed practical steps to help you protect your privacy and protect your personal information.

How Yahoo! Uses Your Personal Information

This policy covers how Yahoo! treats personal information that Yahoo! collects and receives, including information related to your past use of Yahoo! products and services. Personal information is information about you that is personally identifiable like your name, address, email address, or phone number, and that is not otherwise publicly available.

This privacy policy only applies to Yahoo!

This policy does not apply to the practices of companies that Yahoo! does not own or control, or to people that Yahoo! does not employ or manage. In addition, some companies that Yahoo! has acquired have their own privacy policies.

RELEVANT ADVERTISING

By bringing content and advertising to you that is relevant and tailored to your interests, Yahoo! provides a more compelling online experience. Our

Highlights

What was Updated?

Manage Interest-Based Ads

To help make your experiences with Yahoo! more relevant, we employ interest-based ads. Manage your interest-based categories, or opt-out of all categories, from the Yahoo! Ad Interest Manager.

Go to "http://us.lrd.yahoo.com/?_yt=Ad-Manager_OkUpDWW0SkZML2xak5/SIG=11cm1q9d/EXP=1318861679/**http%3A//pulse.yahoo.com/y"

Ad Interest Manager

Hi, Lorrie | Sign Out | Help

Make Y! home, help a school

YAHOO! PRIVACY

Home Products Topics Preferences Help

Ad Interest Manager BETA

Yahoo! Privacy Policy > Yahoo! Privacy Policy > Ad Interest Manager

Email Print

Ad-Supported Websites

Yahoo! is an advertising supported website. Most of the products and services we offer are largely free of charge to you because we display advertising. Other websites also partner with Yahoo! to show ads on their sites to support their offerings.

Additional Choices

Yahoo! will apply your ad interest opt-out to certain other products we offer. By opting out of receiving interest-based ads, you will also be opting out of both receiving interest-based content and data collection through partner sites for our analytics products.

Other Inputs

Ad Interest Manager BETA

To make our ads more relevant and useful for you, we make educated guesses about your interests based on your activity on Yahoo!'s sites and services. Some of the ads we show you reflect these interests. You can opt out of interest-based advertising altogether using the tools on this page. [Learn more.](#)

Your Interest Categories ?

We use information about many of the pages you have visited, ads you have seen and clicked, and some of your searches on Yahoo! to create interest categories that help us choose the kinds of ads you'll see. You can edit or de-select categories here or opt out of interest-based ads altogether. [See All Standard Categories](#)

Interest Categories: Set to:

Miscellaneous > Government and Military

ON OFF

Interest-based Ads:

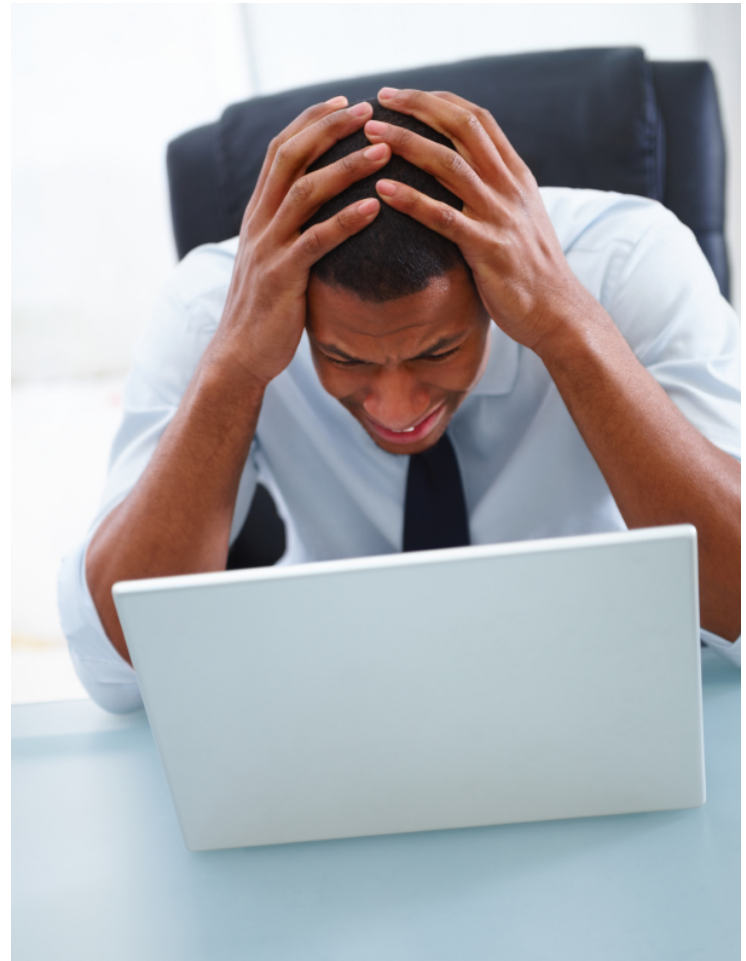
Are currently on.

You must allow cookies from Yahoo! in order to opt out. To make your opt-out apply to every computer you use you must be signed in to your Yahoo! account. [Learn more.](#)

Nobody wants to read privacy policies

“the notice-and-choice model, as implemented, has led to long, incomprehensible privacy policies that consumers typically do not read, let alone understand”

- *Protecting Consumer Privacy in an Era of Rapid Change. Preliminary FTC Staff Report. December 2010.*



Towards a privacy “nutrition label”

- Standardized format
 - People learn where to find answers
 - Facilitates policy comparisons
- Standardized language
 - People learn terminology
- Brief
 - People find info quickly
- Linked to extended view
 - Get more details if needed



Iterative design process

- Series of studies
 - Focus groups
 - Lab studies
 - Online studies
- Metrics
 - Reading-comprehension (accuracy)
 - Time to find information
 - Ease of policy comparison
 - Subjective opinions, ease, fun, trust

P.G. Kelley, J. Bresee, L.F. Cranor, and R.W. Reeder. A “Nutrition Label” for Privacy. SOUPS 2009.

P.G. Kelley, L.J. Cesca, J. Bresee, and L.F. Cranor. Standardizing Privacy Notices: An Online Study of the Nutrition Label Approach. CHI2010.





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

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

Privacy label for Android

Word Weasel
concreterose [Download](#)

Next game starts in 33.3 seconds
wink
Score 18
gone · wig · wise · wink · won
Last game: score 0

Wait for next game | Join game in progress

Privacy score ★★★★★ 793
10,000+ downloads
1.9MB

DESCRIPTION

Like word games? Like weasels? This is the game for you. Word Weasel is a fast word game where you find as many words as you can from 9 letters in 50 seconds. Compete with everyone else playing at the same time, a new game starts every minute!

"The most fun you can have on your own with 9 random letters. Brilliantly simple, devilishly addictive." --Kim, Android Market comment

Word Weasel
concreterose [Download](#)

comment

Ad supported, with ability to upgrade to ad-free full version in game.

Uses the SOWPODS word list containing 100,000+ words. They may be obscure, but yes those are words!

Privacy Facts

THIS APP COLLECTS YOUR

- Personal information
- Contacts
- Location
- Calendars
- Credit card / financial
- Diet / nutrition
- Health / medical
- Photos

THIS APP USES

- Advertising
- Analytics

REVIEWS

Average	5 stars	534
4.6	4 stars	210
★★★★☆	3 stars	37
793	2 stars	5
	1 star	7

P Privacy Icons

<http://www.azarask.in/blog/post/privacy-icons/>

2010



Your Data is Used Only for the Intended Use



Your Data May be Used for Purposes You Do Not Intend



Your data is never given to advertisers.



Site gives your data to advertisers.



Your data is never bartered or sold.



Your data may be bartered or sold.



Data is given to law enforcement only when legal process is followed.



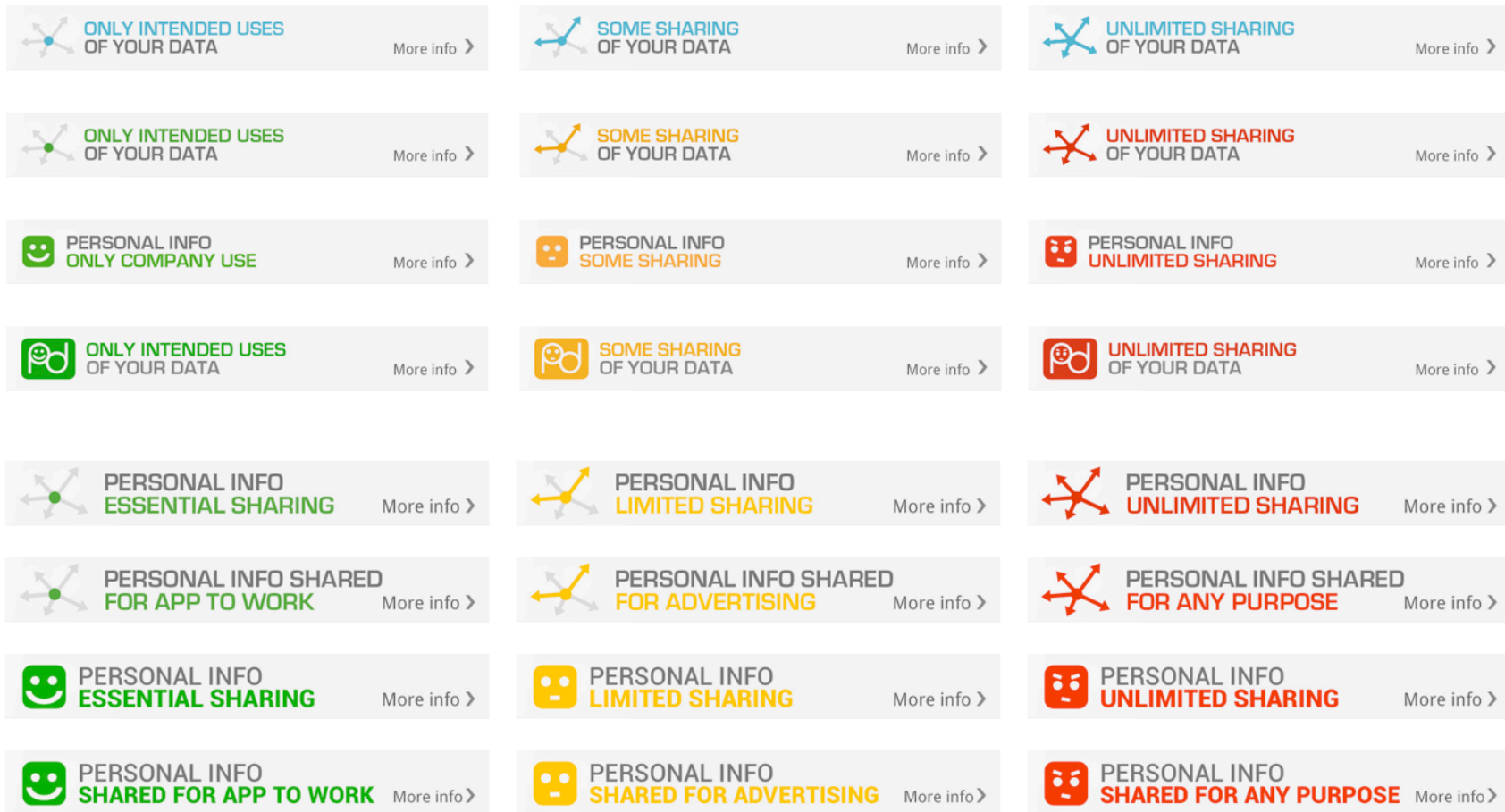
Data may be given to law enforcement even when legal process is not followed.



Your data is kept for less than 1 month.

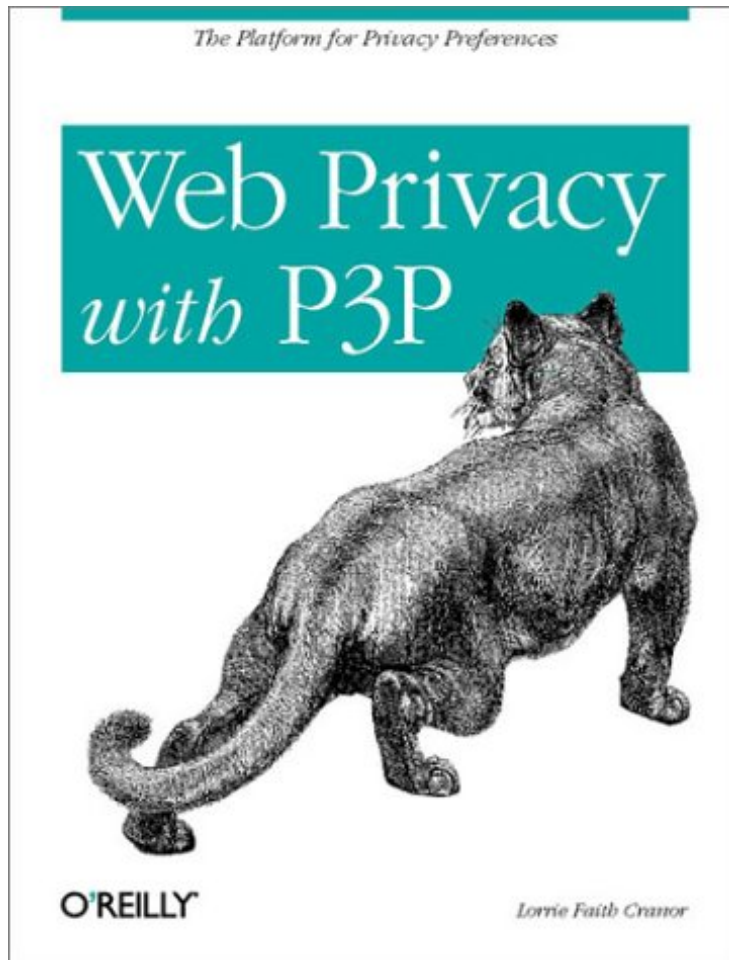


Your data may be kept indefinitely.



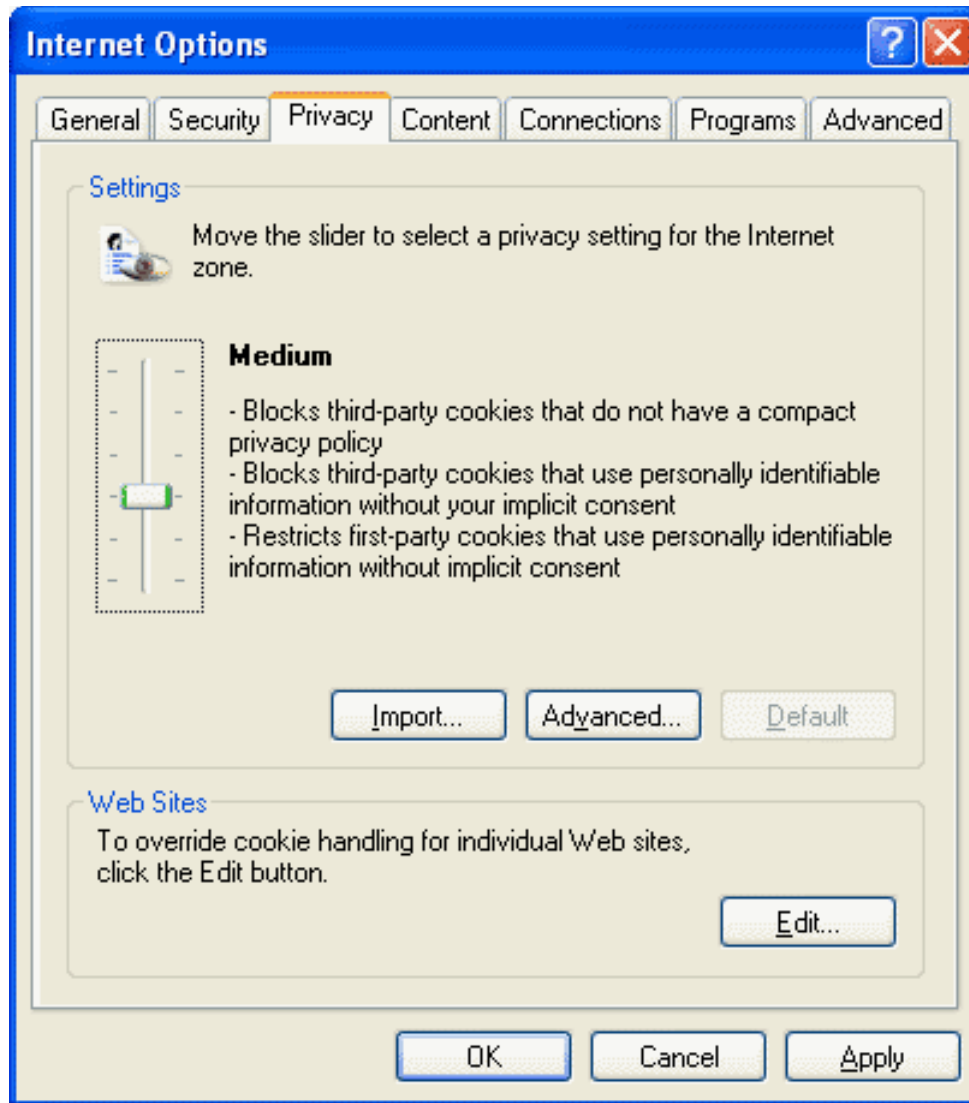
Smartphone App Privacy Icon Study Conducted for LifeLock, Inc. by Cranor et al., 2013

Let your computer read for you

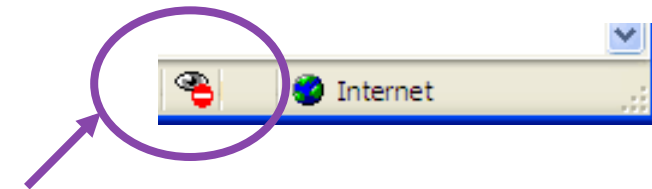


- Platform for Privacy Preferences (P3P)
- W3C specification for XML privacy policies
 - Proposed 1996
 - Adopted 2002
- Optional P3P compact policy HTTP headers to accompany cookies
- Lacks incentives for adoption

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

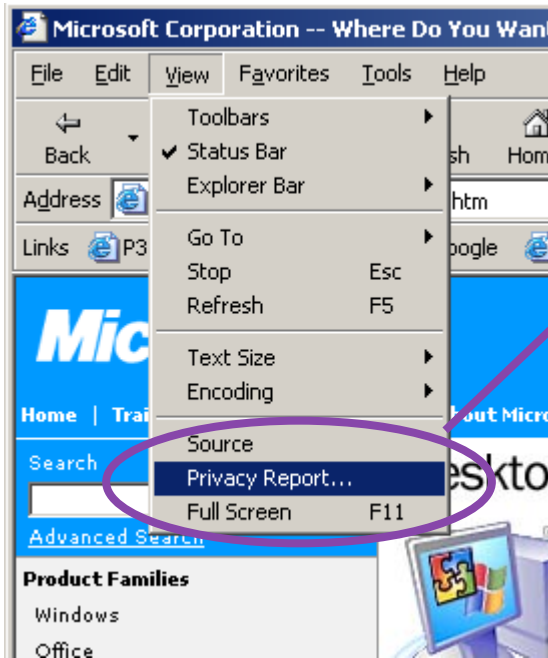
[Will It Sell? How to Determine If Yo...](#)
James E. White

[Digital Copyright](#)
Jessica Litman

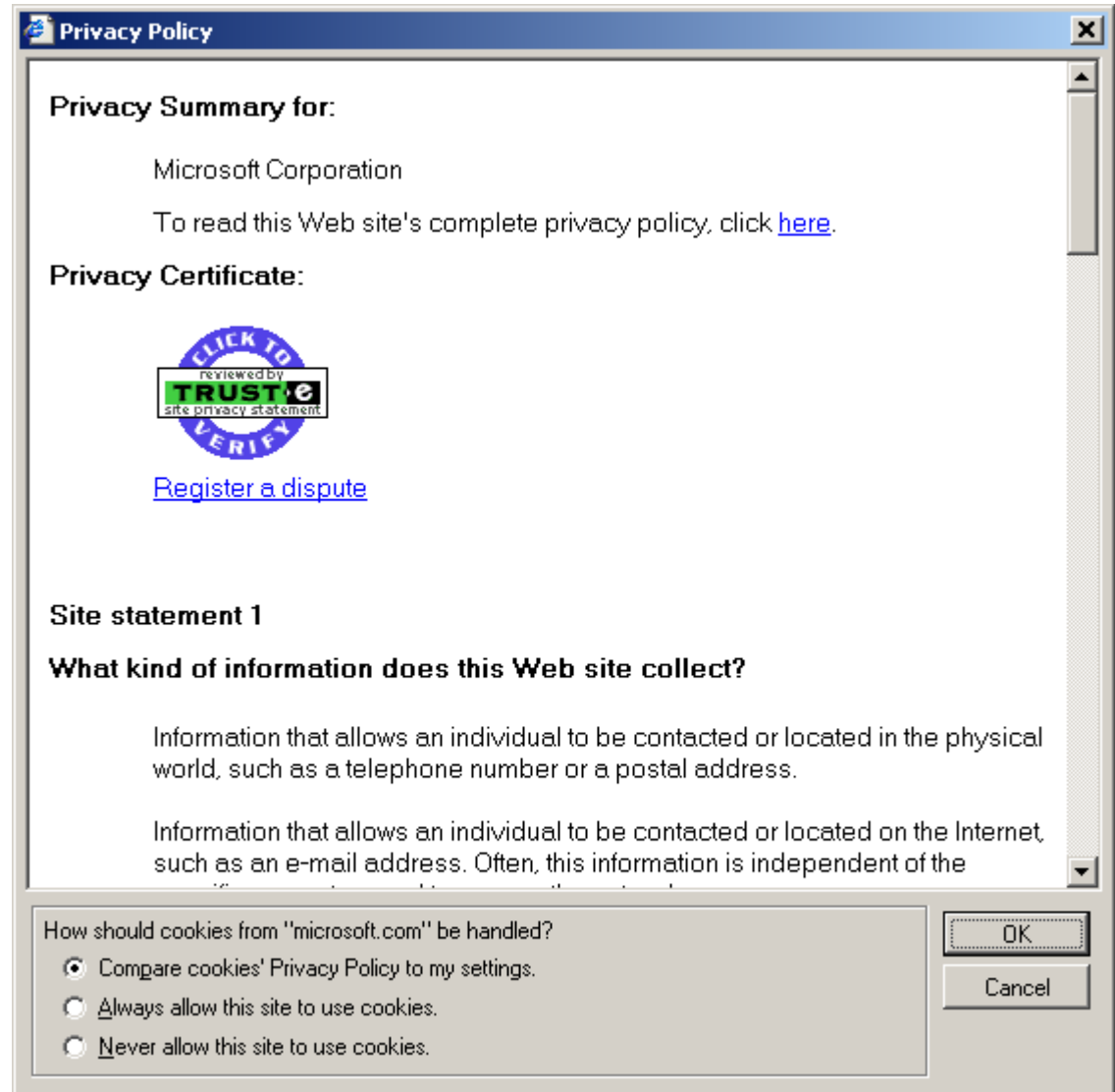
[Intellectual Property](#)

Internet

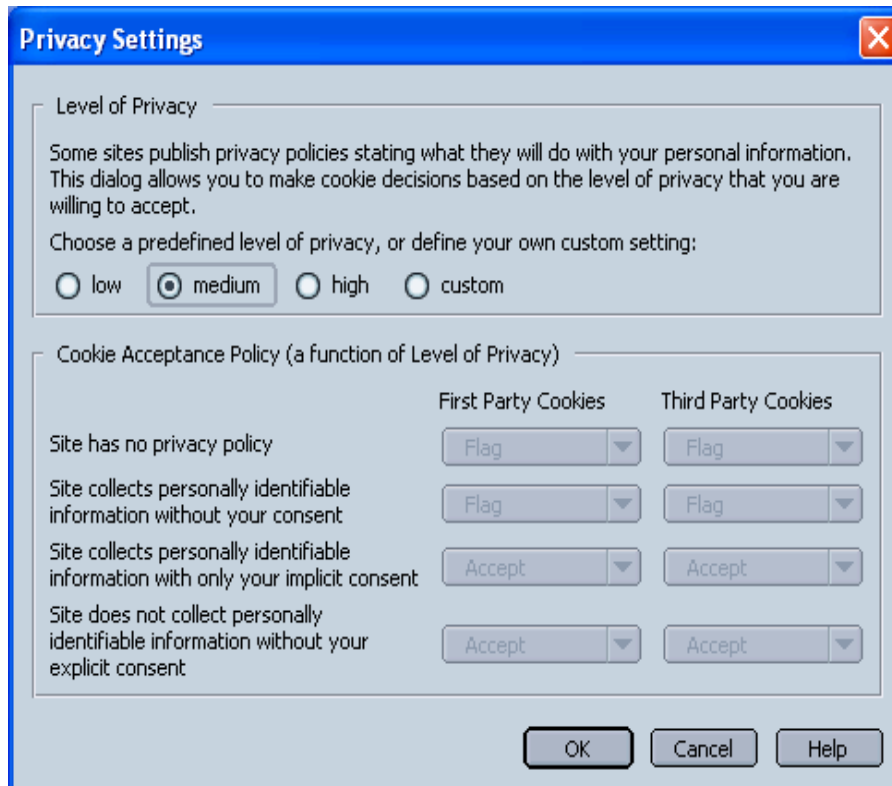
Users can click on privacy icon for list of cookies; privacy summaries are available at sites that are P3P-enabled



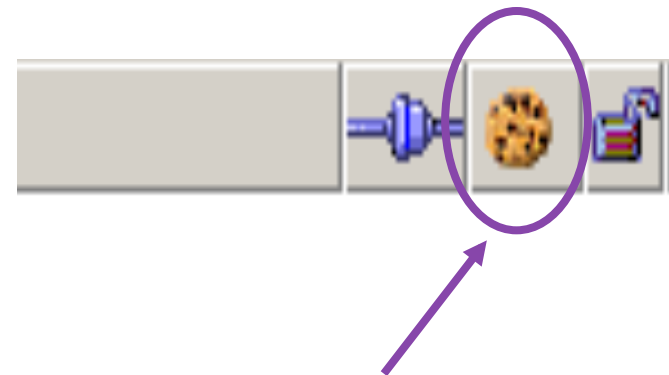
Privacy summary report is generated automatically from full P3P policy



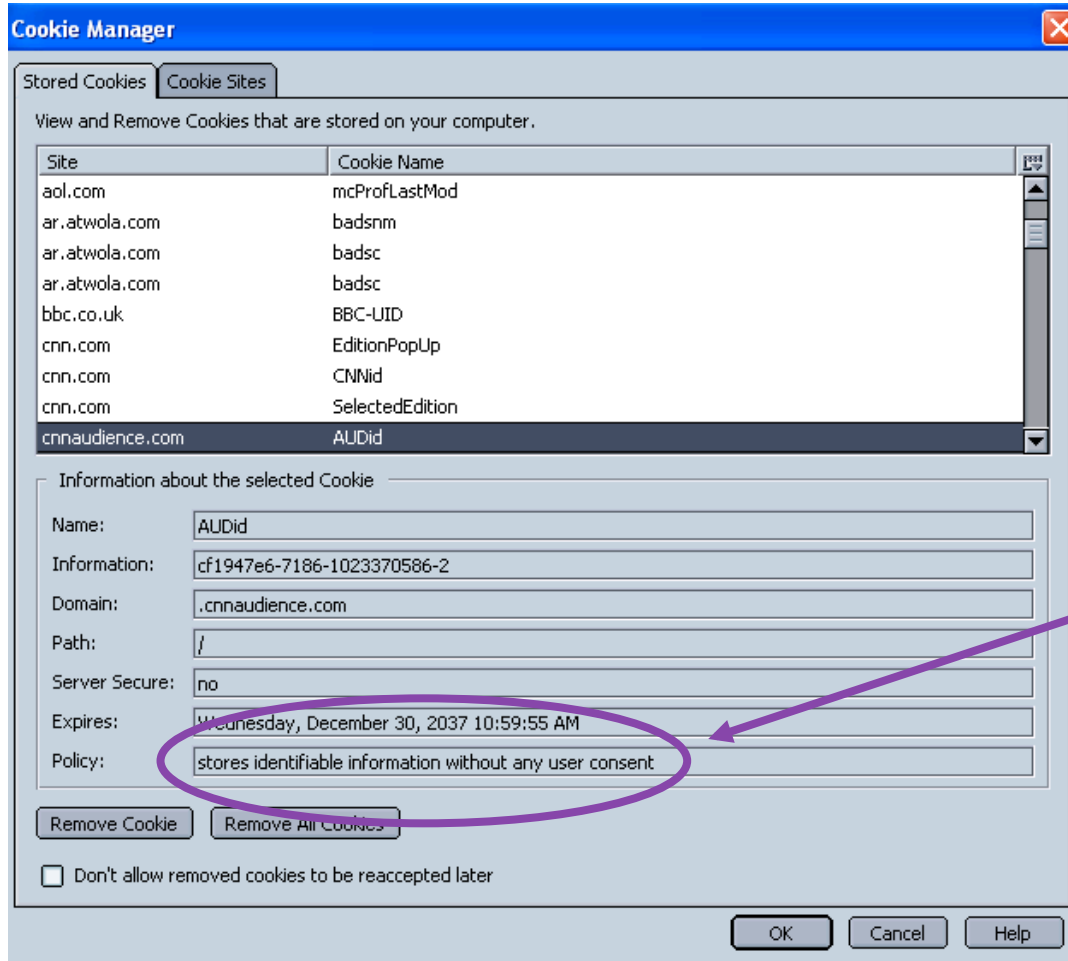
P3P in Netscape 7



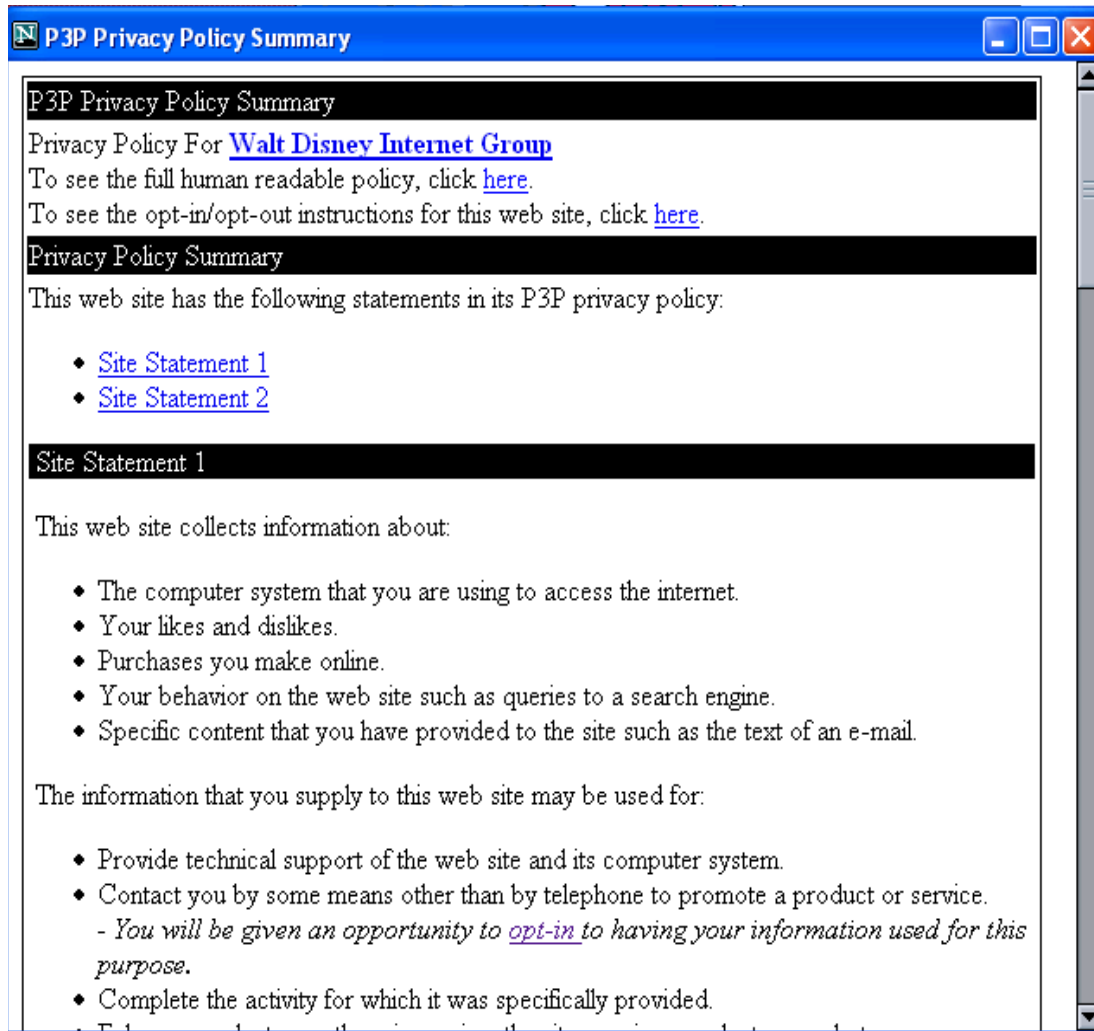
Preview version similar to IE6, focusing, on cookies; cookies without compact policies (both first-party and third-party) are “flagged” rather than blocked by default



Indicates flagged cookie



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



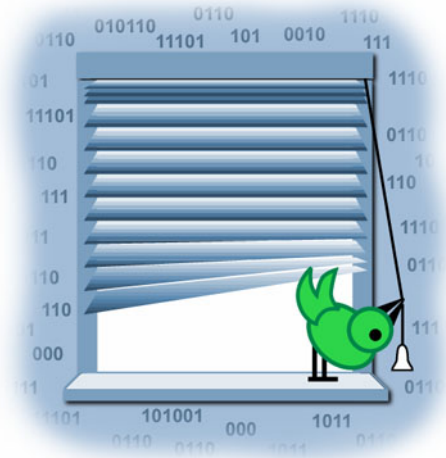
A policy summary can be generated automatically from full P3P policy

What's in a P3P policy?

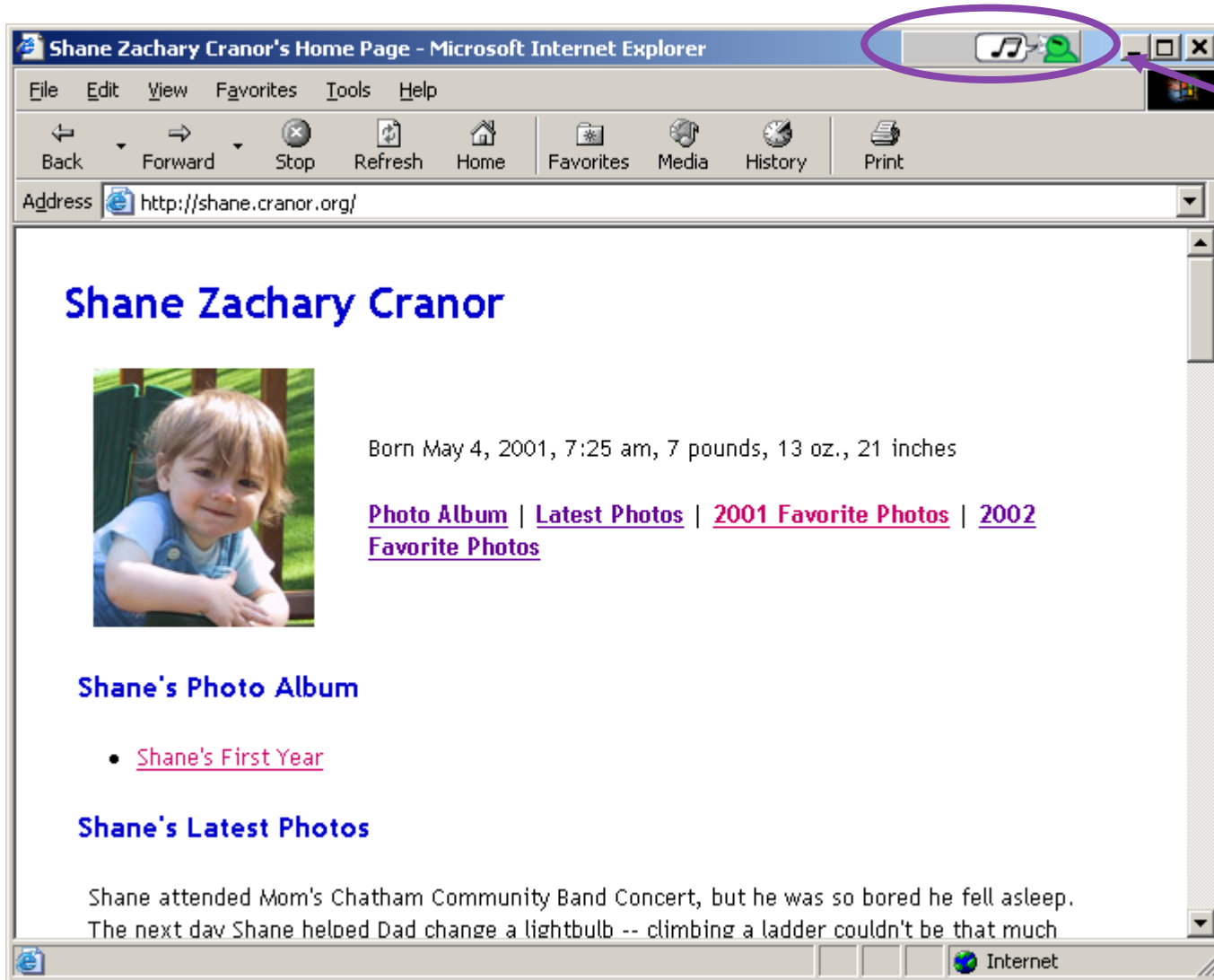
- Name and contact information for site
- The kind of access provided
- Mechanisms for resolving privacy disputes
- The kinds of data collected
- How collected data is used, and whether individuals can opt-in or opt-out of any of these uses
- Whether/when data may be shared and whether there is opt-in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

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 on the left features a profile for Shane Zachary, including a photo of a young child and links to a photo album and latest photos. A right-hand sidebar, titled "Policy Summary", is overlaid on the page, displaying the following information:

Shane Cranor's Home Page Privacy Practices

Privacy Policy Check

Shane Cranor's Home Page's privacy policy *matches your preferences.*

Privacy Policy Summary

This site has 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 Explor

Back Forward

Address http://1-800-fl

1-800-flower
your trusted guide

home flowers

welcom
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

20

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 homepage. An 'Embedded Content' dialog box is open, listing various URLs and their privacy check results. The dialog box contains 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/i/284/987/2h/lygo.com/s.gif	Unknown	Image
http://a676.g.akamai.net/i/676/987/12h/lygo.com/ly/0/hp/dotline_1...	Unknown	Image
http://a676.g.akamai.net/i/676/987/12h/lygo.com/ly/0/hp/foot_angl...	Unknown	Image
http://a676.g.akamai.net/i/676/987/12h/lygo.com/ly/0/hp/hp_shop_...	Unknown	Image
http://a676.g.akamai.net/i/676/987/12h/lygo.com/ly/0/hp/hp_shop_...	Unknown	Image
http://a676.g.akamai.net/i/676/987/12h/lygo.com/ly/0/hp/hp_topics...	Unknown	Image
http://a676.g.akamai.net/i/676/987/12h/lygo.com/ly/0/hp/hp_topics...	Unknown	Image
http://a676.g.akamai.net/i/676/987/12h/lygo.com/ly/0/hp/news_Bu...	Unknown	Image
http://a676.g.akamai.net/i/676/987/12h/lygo.com/ly/0/hp/s.gif	Unknown	Image
http://a676.g.akamai.net/i/676/987/12h/lygo.com/ly/0/hp/tools_ang...	Unknown	Image
http://a676.g.akamai.net/i/676/987/12h/lygo.com/ly/0/hp/tools_righ...	Unknown	Image
http://a676.g.akamai.net/i/676/987/12h/lygo.com/ly/0/hp/tools_righ...	Unknown	Image
http://a676.g.akamai.net/i/676/987/12h/lygo.com/ly/0/hp/topics_do...	Unknown	Image
http://a676.g.akamai.net/i/676/987/12h/lygo.com/ly/0/hp/valentine...	Unknown	Image
http://a676.g.akamai.net/i/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.

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)

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

-  Shop by Product
-  Shop by Occasion
-  About Our Services
-  Request a Catalog
-  Comments & Inquiries
-  Floral Care & Giving

PHILLIP'S
1-800-FLORALS
 1-800-356-7257

1800Florals SEARCH

Choose A Product
 Choose An Occasion
 All Price Ranges
Select one or more options and go!



Send Flowers Online! Local, National & International Florist Delivery. Secure Ordering. Satisfaction Guaranteed. Since 1923.

PICKS OF THE WEEK



FTD® Star Gazer™ Bouquet #3061X \$109.95



Multicolor Roses Bowl #0683T \$59.95



Pastel Basket Planter #1112T \$49.95



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 p3p:barnesandnoble.com/.

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


No P3P syntax checking in IE

- IE accepts P3P policies containing bogus tokens or missing required tokens
- Example of valid compact policy:

 **CAO DSP COR CURa ADMa DEVa OUR
IND PHY ONL UNI COM NAV INT DEM PRE**

- Examples of invalid policies accepted by IE:

 **AMZN**

 **Facebook does not have a P3P policy.
Learn why here: <http://fb.me/p3p>**

P. Leon, L. Cranor, A. McDonald, and R. McGuire. Token Attempt: The Misrepresentation of Website Privacy Policies through the Misuse of P3P Compact Policy Tokens. WPES 2010.

[MSDN Blogs](#) > [IEBlog](#) > [Google Bypassing User Privacy Settings](#)

Google Bypassing User Privacy Settings

Published Monday, February 20, 2012 1:31 PM

 152 comments

When the IE team heard that Google had bypassed user privacy settings on Safari, we asked ourselves a simple question: is Google circumventing the privacy preferences of Internet Explorer users too? We've discovered the answer is yes: Google is employing similar methods to get around the default privacy

Languages

[English](#)[Français](#)[Deutsch](#)[Português \(Brasil\)](#)[한국어](#)[日本語](#)[简体中文](#)[Русский](#)

Microsoft uses a “self-declaration” protocol (known as “P3P”) dating from 2002 It is well known – including by Microsoft – that it is impractical to comply with Microsoft’s request while providing modern web functionality.

Carnegie Mellon University School of Computer Science

Towards Usable Privacy Policies: The Usable Privacy Policies Project

Florian Schaub

March 17, 2015

Why privacy policies?

- Transparency about a service provider's data practices
- Notice & Choice framework in the US
- Informed(?) user consent

- Goal: Reduce power asymmetry between provider and user

Proposals to improve notices

- Summary interfaces and layered privacy policies
 - e.g. privacy nutrition labels, short notices, privacy icons
- Machine-readable privacy policies (e.g. P3P, DNT)

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				
purchasing information		opt out				
social security number & gov't ID						
your activity on this site			opt out			
your location						

Access to your information
This site gives you access to your contact or its other data identified with you

How to resolve privacy-related disputes
Please email our customer service department



P. G. Kelley, L. Cesca, J. Bresee & L. F. Cranor *Standardizing privacy notices: an online study of the nutrition label approach*, CHI '10, ACM 2010.

Proposals to improve notices

- Summary interfaces and layered privacy policies
 - e.g. privacy nutrition labels, short notices, privacy icons
- Machine-readable privacy policies (e.g. P3P, DNT)
- Lack of industry support & adoption incentives

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				
purchasing information		opt out				
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The Usable Privacy Policies Project

- NSF SaTC Frontier project (3.5 years)
- Principal investigators:
 - Norman Sadeh (Lead PI, CMU)
 - Alessandro Acquisti (CMU)
 - Travis Breaux (CMU)
 - Lorrie Cranor (CMU)
 - Aleecia McDonald (Stanford)
 - Joel Reidenberg (Fordham)
 - Noah A. Smith (CMU)

www.usableprivacy.org

**Carnegie
Mellon
University**



FORDHAM UNIVERSITY
THE JESUIT UNIVERSITY OF NEW YORK

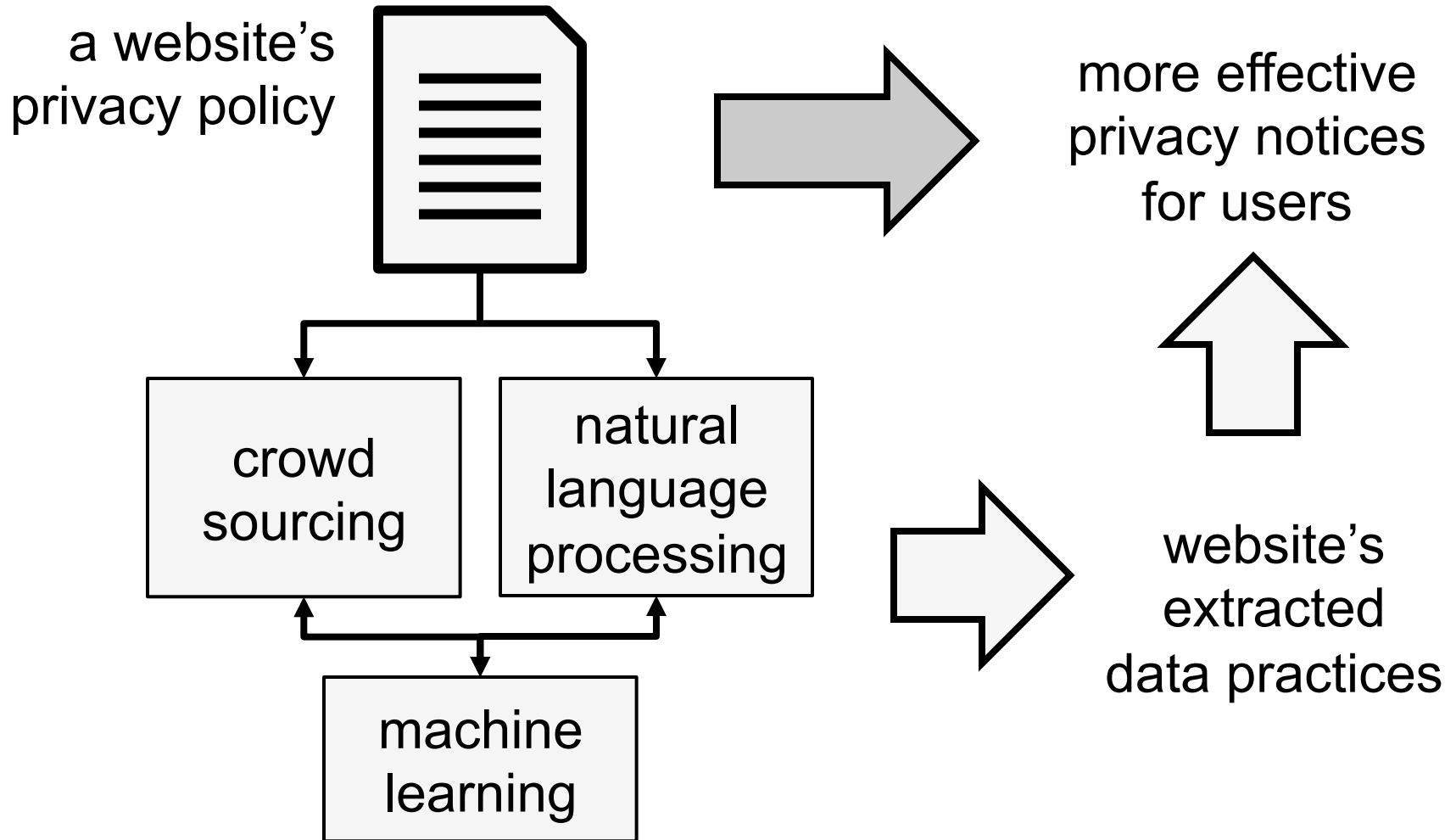
Stanford University



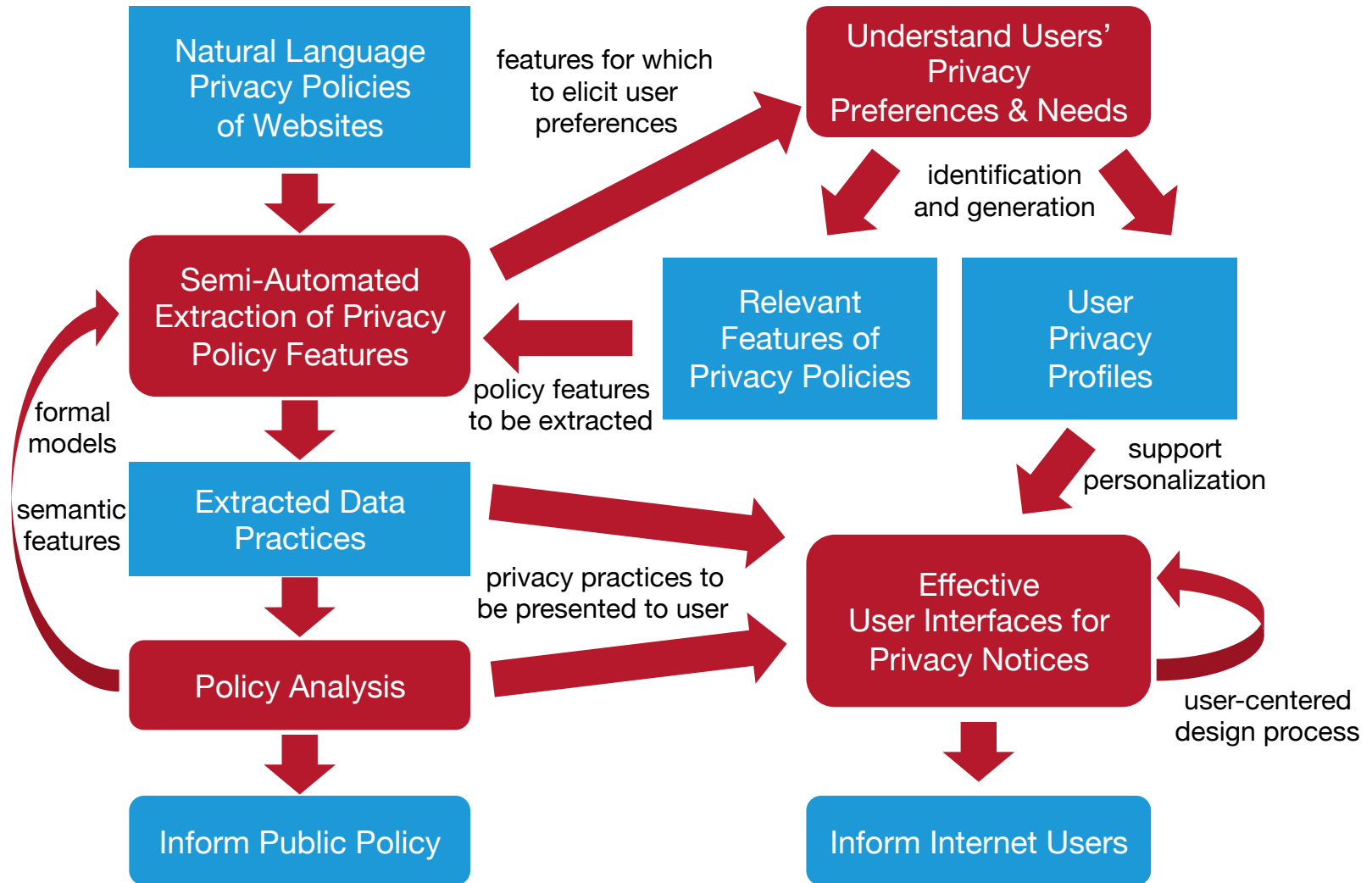
Our approach

- **Semi-automatically extract data practices from privacy policies** by combining crowdsourcing, machine learning & natural language processing
- Understanding and modeling **user's privacy preferences** to focus on data practices users care about
- Provide **effective user interfaces** for privacy notices
- **Large-scale analysis** of website privacy policies

General idea

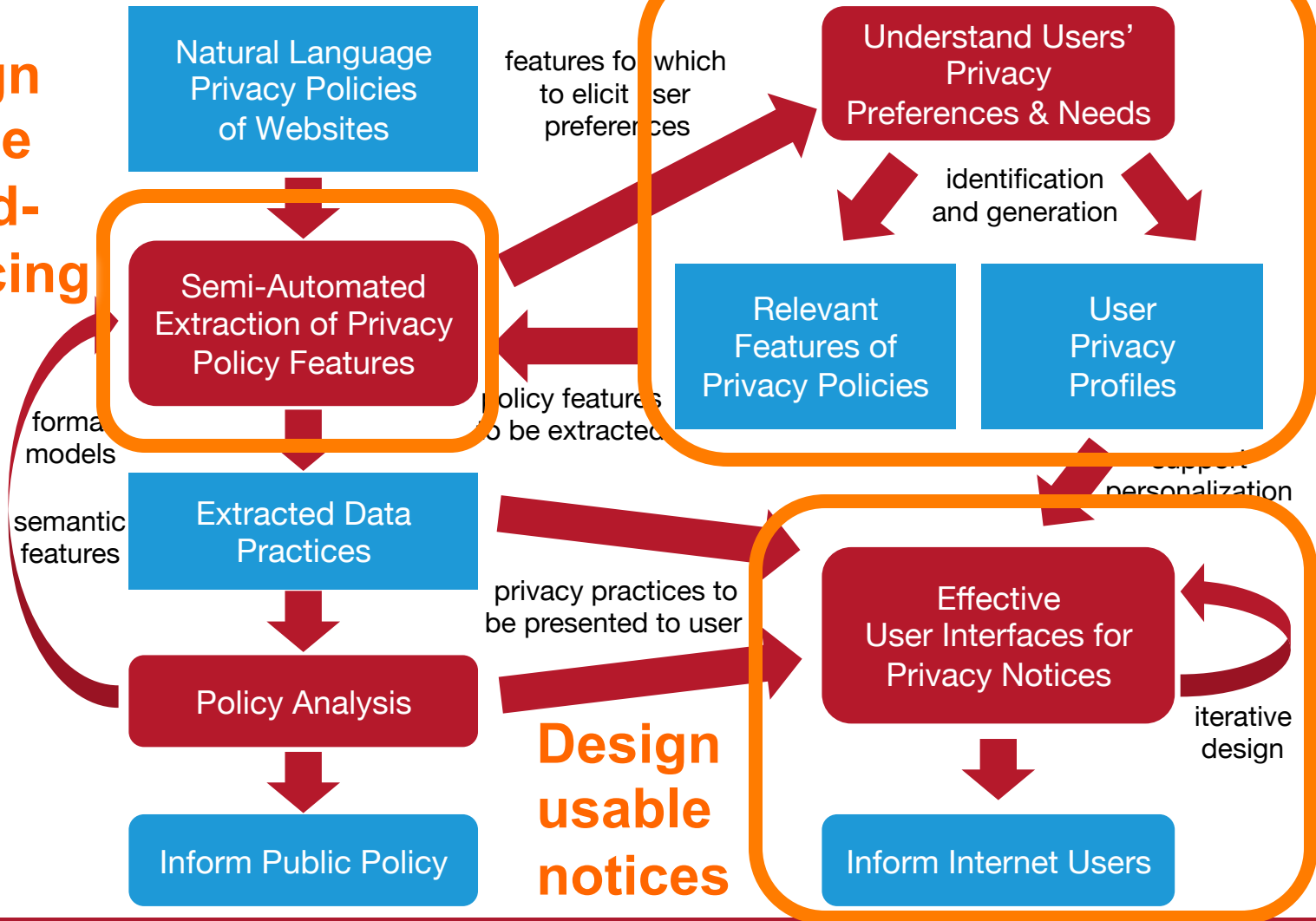


Overall Approach



Usability Aspects

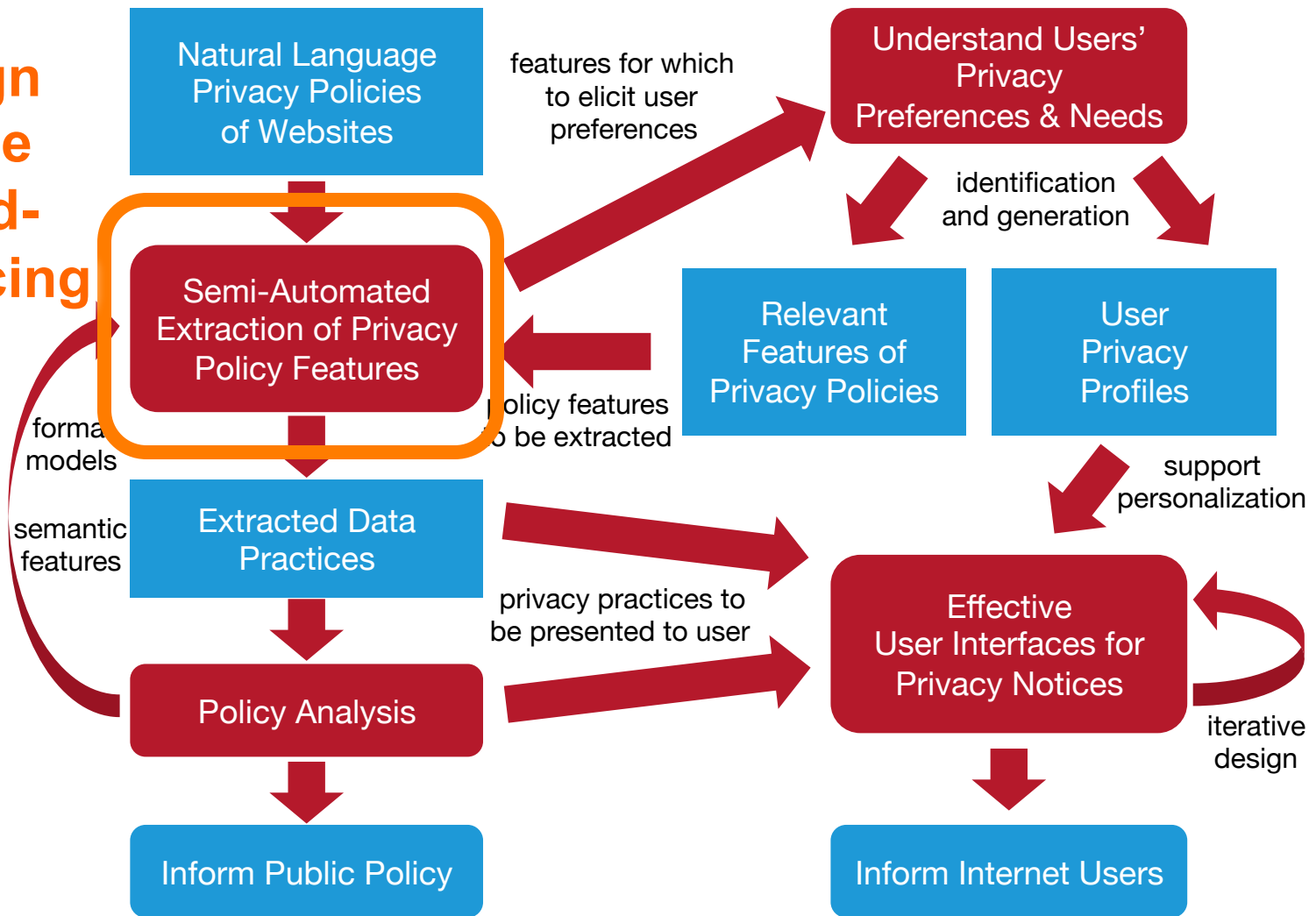
Design usable crowd-sourcing tasks



Understand what data practices are relevant

Usability Aspects

**Design
usable
crowd-
sourcing
tasks**



Relevant data practices

- Analysis of 165 US federal class action cases
- Analysis of 116 FTC enforcement complaints
 - Unauthorized **disclosure of personal information**
 - Surreptitious **collection of personal information**
 - Unlawful **retention of personal information**
 - Failure to secure personal information
- Prior studies on privacy preferences & concerns
 - information types: **contact, location, financial health**

J. R. Reidenberg, N.C. Russell, A. J. Callen, S. Qasir, T. B. Norton, *Privacy harms and the effectiveness of the notice and choice framework*, *I/S: Journal of Law and Policy for the Information Society*, (to appear). Available on SSRN.

Crowdsourcing privacy policy extractions

- Not your typical crowdsourcing task
- Challenges
 - obtain **high quality annotations**
 - with **manageable cost**
 - from **non-expert crowd workers**
 - from **complex policy documents**

Privacy policy annotation tool

usableprivacy User Profile Task Settings Logout

Search this policy

time.com

Sports Illustrated
PRIVACY POLICY

Table of Contents

- The Information We Collect
- How We Use the Information
- Privacy Options
- Your California Privacy Rights: Notice to California Customers
- Collection of Information by Third-Party Sites and Sponsors
- Cookies
- Our Commitment to Security
- Accessing, Correcting, and Deleting Your Personal Information
- Retention of Personal Information
- Special Note for Parents
- Changes to this Privacy Policy
- How to Contact Us
- Safe Harbor Privacy Policy

European Union Privacy Information
For citizens of member countries of the European Union, and Switzerland, Norway, Lichtenstein, Iceland, Australia, and New Zealand

Canada Privacy Information

This is the Privacy Policy which applies to you if you live outside the European Union, Switzerland, Norway, Lichtenstein, Iceland, Australia, New Zealand, and Canada.

Answer the following questions

[Click here to view the instructions again](#)

Question:
Does the policy state that the **website** might **collect contact information** about its users?

Your personally identifiable information may be required to engage in these activities as well as to receive products and services that you may have requested.

- No** - the policy explicitly states that the **website** will not collect **contact information**.
- Yes** - the policy explicitly states that the website might collect contact information.
- Unclear** - the policy does not explicitly state whether the website might collect contact information or not, but the selected sentences could mean that contact information might be collected.
- Not applicable** - this question is not addressed by this policy.

Your Progress

Privacy policy annotation tool

- Iterative design
- Goals & insights
 - policy and questions visible at same time
 - clear & accessible instructions
 - sequential and go-to navigation
 - sentence selection with undo
 - concise questions & response options, yet understandable
 - keyword definitions
 - unclear is a valid answer

Annotation results

collection of contact information

2x **Yes:** The policy explicitly states that the website might collect contact information

6x **Unclear:** The policy does not explicitly state whether the website might collect contact information or not

The Information We Collect

At some Turner Network sites, you can order products, enter contests, vote in polls or otherwise express an opinion, subscribe to one of our services such as our online newsletters, or participate in one of our online forums or communities. In the course of these various offerings, we often seek to collect from you various forms of personal information. Examples of the types of personally identifiable information that may be collected at these pages include: name, address, e-mail address, telephone number, fax number, credit card information, and information about your interests in and use of various products, programs, and services.

At some Turner Network sites, you may also be able to submit information about other people. For example, you might submit a person's name and e-mail address to send an electronic greeting

Interpretation of privacy policies

- Comparative annotation study with **privacy policy experts, skilled annotators, AMT Crowdworkers** on 6 privacy policies
- **Result Highlights**
 - Data collection relatively easy to identify
 - Data sharing practices more difficult
 - Even experts do not always agree
 - Finer nuances difficult to extract
 - Policy language too ambiguous



Reidenberg et al., *Disagreeable Privacy Policies: Mismatches between Meaning and Users' Understanding*, Berkeley Technology Law Journal (to appear), available on SSRN

How good are crowdworkers?

- Only considering answers where 8 of 10 crowdworkers agree:
 - 76% of cases: they agree on **same answer as experts***
 - 2% of cases: they agree on different answer than experts*
 - 22% of cases: crowdworkers do not reach agreement

*3 of 4 experts agree on same answer in 90.1% of cases

Crowdworkers agree with experts or not at all

Reidenberg et al., *Disagreeable Privacy Policies: Mismatches between Meaning and Users' Understanding*, Berkeley Technology Law Journal (to appear), available on SSRN

Predicting & highlighting relevant paragraphs

Skip to highlighted paragraph: [Previous](#) [Next](#)

privacy practices specific to the website or online service.

This Privacy Statement describes the types of personal information we collect on the Site, how we may use that information and with whom we may share it. The Privacy Statement also describes the measures we take to protect the security of the personal information. We also tell you how you can reach us to ask us to update your preferences regarding how we communicate with you or answer any questions you may have about our privacy practices.

Information We Collect

You may choose to provide us with personal information (such as name, contact details and payment information), such as:

Contact information, such as your name, address, telephone number, and email address, and your title or occupation.

Login and access credentials (such as username and password) for Lowe's accounts.

Payment information, such as your payment card number and expiration date.

Date of birth.

The geolocation of your device (such as if you opt to use the "Find Near Me" feature of the mobile-optimized portion of our websites or our Mobile Applications).

The unique ID number associated with certain Lowe's accounts.

Answer the following questions

[Click here to view the instructions again](#)

Question 2:
Does the policy state that the **website** might **collect financial information** about its users?

[Select sentence from policy and click](#) [Remove last selection](#)

Find the answer in the document, highlight the sentences containing the answer, and click the blue button above to paste the text here

No - the policy explicitly states that the **website** will not collect **financial information**.

Yes - the policy explicitly states that the website might collect financial information.

Unclear - the policy does not explicitly state whether the website might collect financial information or not, but the selected sentences could mean that financial information might be collected.

Not applicable - this question is not addressed by this policy.

[Previous](#) [Next](#)

11% Your Progress

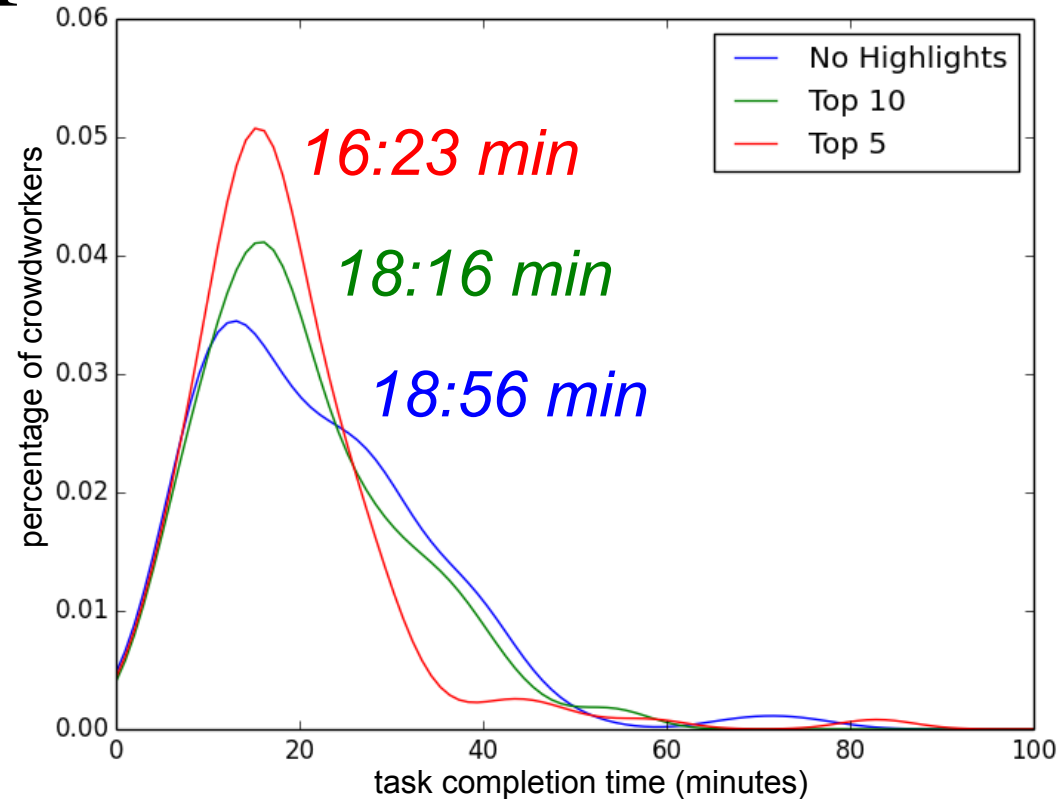
[Jump directly to question ▾](#)

Predicting relevant paragraphs

- Analysis of sentences selected by experts and skilled annotators
 - 110 data practice specific regular expressions
 - Logistic regression to rank paragraphs based on probability of containing the answer to question x
 - Regression features: regex matches, n-grams
- Evaluation study with crowdworkers
 - between subjects crowdworkers (no, 5 or 10 highlights)
 - compared to skilled annotator gold standard data

Highlighting experiment results

- 10 highlights increase accuracy
- 5 highlights significantly faster, but less accurate
- Workers still select text from non-highlighted parts
- Self-reported understanding of legal text increases



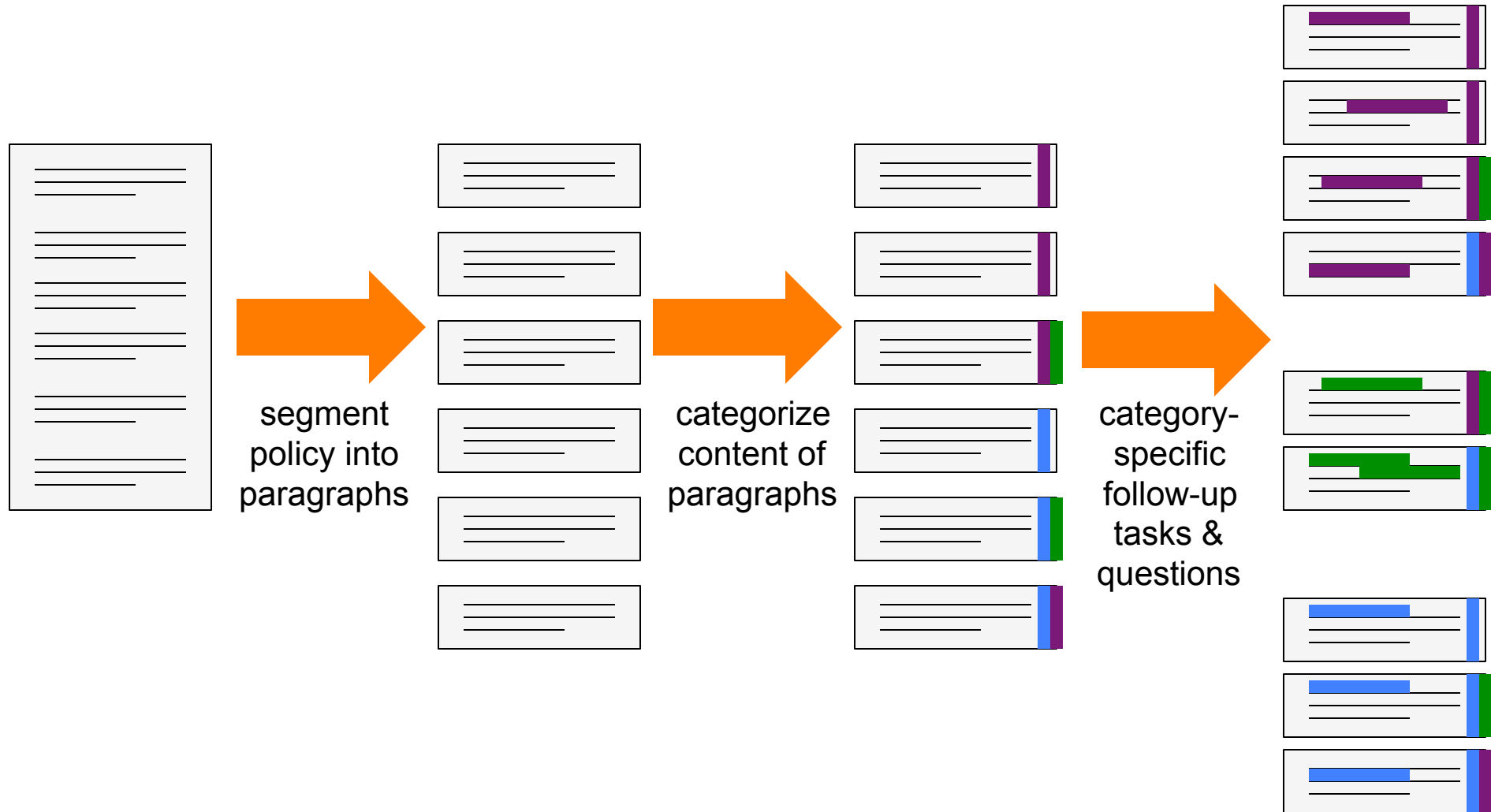
Condition	Correct	Wrong	No Convergence
NOHIGH	76 (84.4%)	4 (4.4%)	10 (11.1%)
TOP05	74 (82.2%)	9 (10 %)	7 (7.8 %)
TOP10	81 (90.0%)	3 (3.3%)	6 (6.7 %)

Challenges

- Long completion times
- Adapt number of workers to question difficulty
- Interpretative ambiguity

Annotation task workflow

Annotation task workflow



Categorize paragraphs

This is a paragraph from the privacy policy of **nytimes.com**
Select all categories that fit.

To enable payment and donations via the NYT Services, we collect and store name, address, telephone number, email address, credit card information and other billing information. This information will only be shared with third parties who help to complete the purchase transaction. Examples of this include fulfilling orders and processing credit card payments.

- collection** information is collected by the main website or provided by the user
- sharing** information is collected by or shared with a third party
- purpose** why information is being collected, shared, etc. or what it is used for
- consent** any choices or privacy controls offered to users (opt-in, opt-out, etc.)
- other** the paragraph talks about other topics or aspects

submit

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Select all categories that fit.

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submit

Category-specific follow-up tasks

- For each label ask label-specific follow-up questions
- Worker selects answer option and marks respective text.
- Example: collection
 - What information collected?
 - For what purpose?
- Example: third party sharing
 - Shared with whom?
 - For what purpose?
 - Use limitations?

Category-specific follow-up tasks

[Click here to read the expanded instructions with an example.](#)

Short Instructions: Select the action verbs with your mouse cursor and then press one of the following keys to indicate when the verb describes an act to:

- Press 'c' for **collect** - any act by Zynga to collect information from another party, including the user
- Press 'u' for **use** - any act by Zynga or another party to use or modify information for a particular purpose
- Press 't' for **transfer** - any act by Zynga to transfer or share information with another party, including the user
- Press 'r' for **retain** - any act by Zynga to retain, store or delete information

In the following paragraph, any pronouns "We" or "Us" refer to the game company Zynga, and "you" refers to the Zynga user.

Paragraph:

We may **collect** or **receive** information from other sources including (i) other Zynga users who choose to **upload** their email contacts; and (ii) third party information providers.

Submit Query

Clear Last

Clear All

Response options for categorization

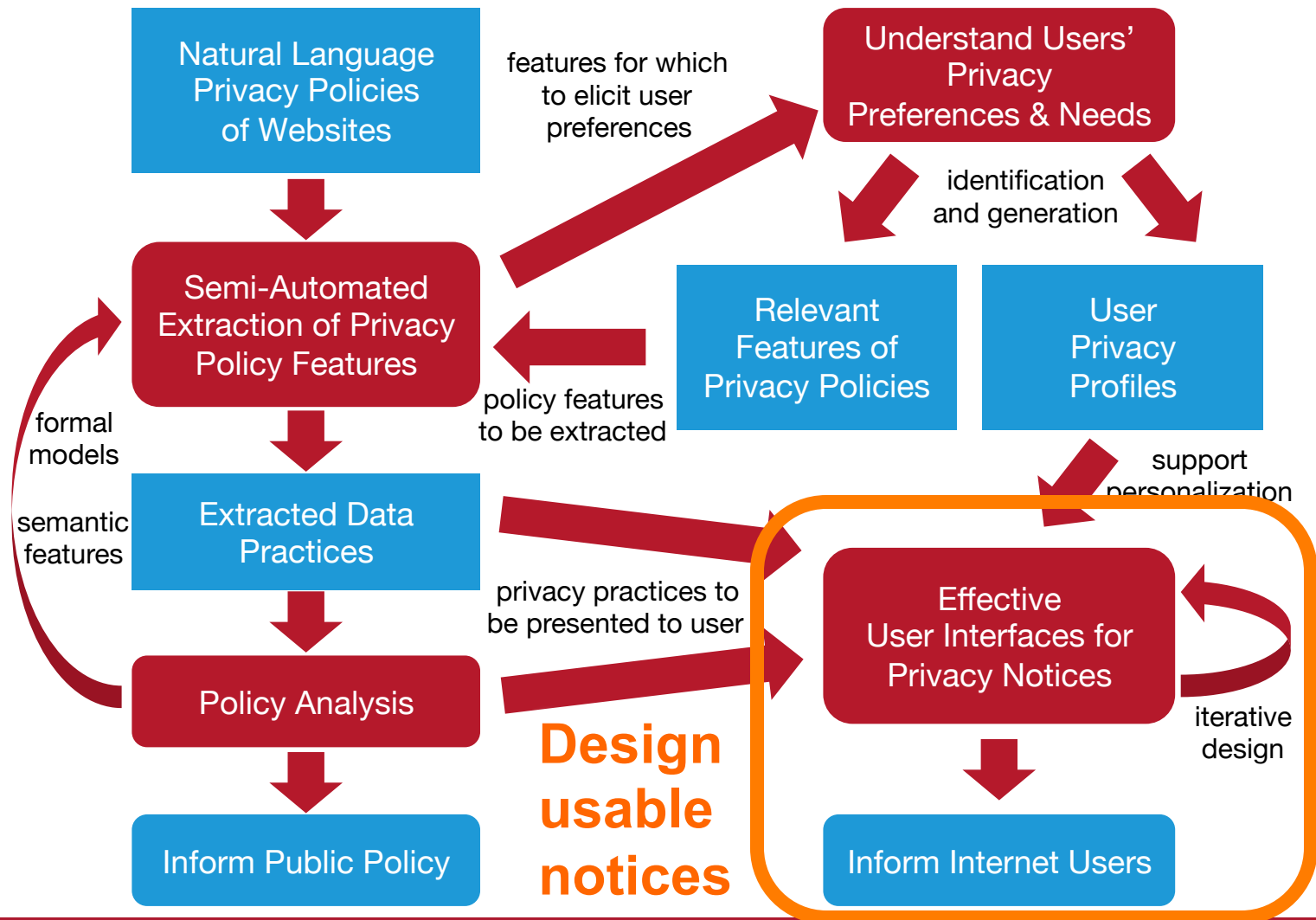
Select relevant words and press button

Travis Breaux & Florian Schaub, *Scaling Requirements Extraction to the Crowd: Experiments with Privacy Policies*, RE 2014.

Advantages & Challenges

- Fine-granular annotation rather than holistic interpretation
- Recombination of results
- Disambiguating scope
- Determining the required number of annotators

Effective Privacy Notices



Existing Privacy Notices & Browser Extensions

DISCONNECT Help Props

f 1 g 0 t

- Advertising: 6 requests
 - KruX: 1 request
 - Outbrain: 1 request
 - TRUSTe: 1 request
 - InsightExpress: 1 request
 - AudienceScience: 1 request
 - Nielsen: 1 request
- Analytics: 2 requests
- Social: 0 requests
- Content: 2 requests

Privacy Badger

Detected 5 trackers from these sites:

- cdn.gigya.com
- cdn1.gigya.com
- gscounters.us1.gigya.com
- cdn.optimizely.com

Bell Group

information we collect

	provide service and maintain site	marketing	telemarketing	profiling	other companies	public forums
contact information		opt in			opt out	
cookies						
demographic information		opt in			opt out	
financial information						
health information						
preferences		opt in			opt out	
purchase information		opt in			opt out	
security number & gov't ID						
activity on this site		opt in			opt out	
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.

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

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

Disconnect Privacy Icons Info Share

examplesite.com

Icons: Home, Share, Location, App, User, DNT, Lock, Heart, Refresh

WOT Warning!

warez.com

This website has a poor reputation based on user ratings

Trustworthiness: ● Very poor

Child safety: ● Very poor

Users have identified the following issues

Terms of Service Didn't Read

CLASS C The terms of service are okay but some issues need your consideration.

Google keeps your searches and other identifiable user information for an undefined period of time.

Google collects a lot of information about the services you use and how you use them, including when you visit a website using a Google service for advertisement. In the past, Google stated in their Privacy Policy: "We strike a reasonable balance between the competing pressures we face, such as the privacy of our users, the security of our systems and the need for innovation. We believe anonymizing IP addresses after 9 months and cookies in our search engine logs after 18 months strikes the right balance". Today, these limitations of time are gone from the Privacy Policy, although some pages still acknowledge this. So we must conclude that Google has decided to stop trying to find the right balance between privacy of users and their own needs.

Limited copyright license to operate and improve all Google Services

BANK PRIVACY

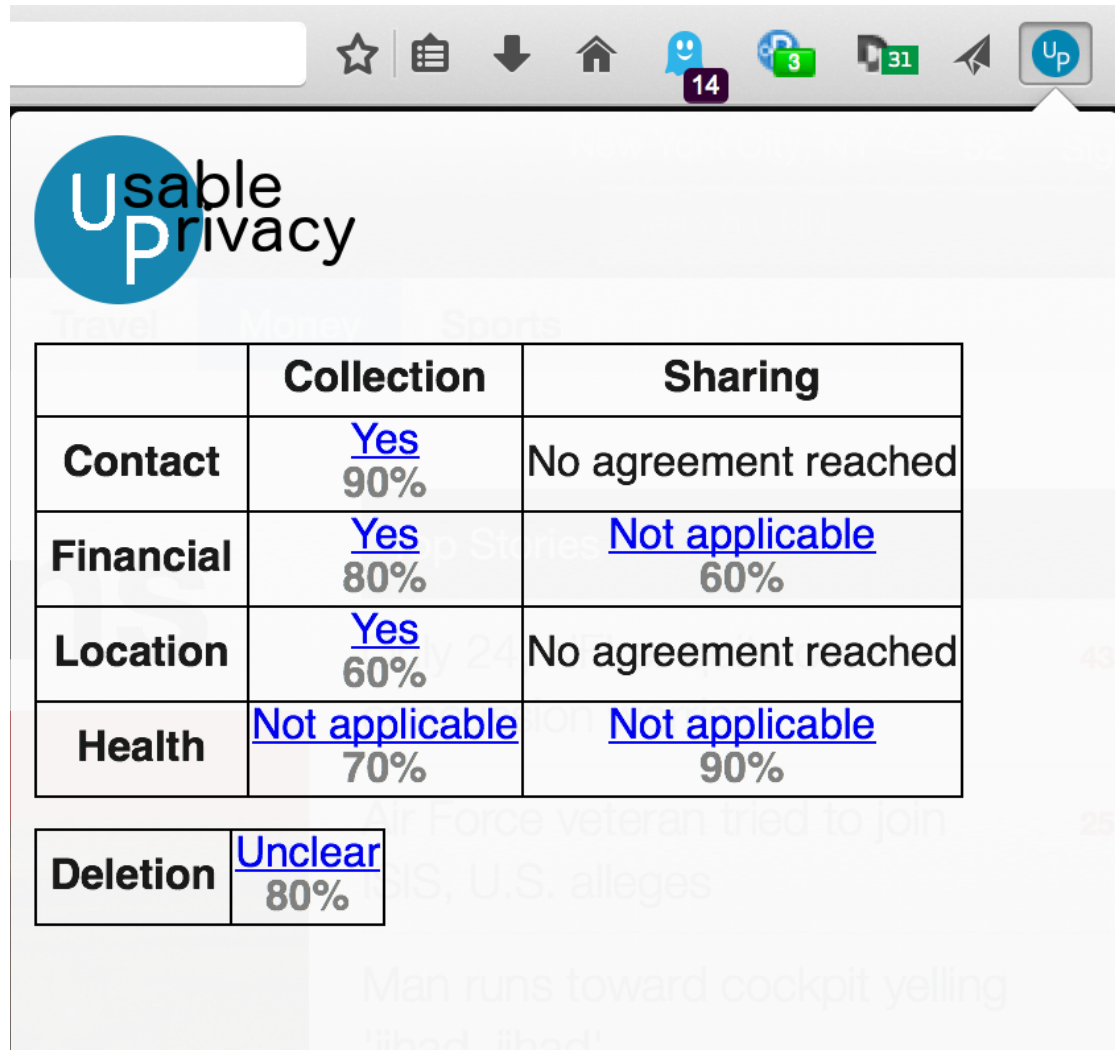
Reasons banks may share your personal information	Does Citibank share?
For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Shares, no opt-out 0.8% do better?
For our marketing purposes to offer our products and services to you	Shares, no opt-out 35.8% do better?
For joint marketing with other financial companies	Shares, no opt-out 64.6% do better?
For our affiliates' everyday business purposes information about your transactions and experiences	Shares, no opt-out 75.2% do better?
For our affiliates' everyday business purposes information about your creditworthiness	Shares, offers opt-out 85.9% do better?
For our affiliates to market to you	Shares, offers opt-out 27.2% do better?
For nonaffiliates to market to you	Shares, offers opt-out 88.2% do better?

Ghostery found 10 trackers www.cnn.com

- Audience Science Beacons
- Detected tracker source URLs: http://js.revsci.net/gateway/gw.js?csid=A09801
- ChartBeat Analytics
- Dynamic Logic Beacons
- Facebook Connect Widgets, Social
- InsightExpress Analytics, Analytics

Buttons: Pause Blocking, Whitelist Site, ?

Version 0



The screenshot shows a web browser interface with the Usable Privacy logo at the top left. Below the logo is a table with two columns: 'Collection' and 'Sharing'. The table contains five rows of data, each representing a different type of data collection. The 'Collection' column contains a percentage and a status (Yes, Not applicable, or Unclear). The 'Sharing' column contains a status (No agreement reached or Not applicable).

	Collection	Sharing
Contact	<u>Yes</u> 90%	No agreement reached
Financial	<u>Yes</u> 80%	<u>Not applicable</u> 60%
Location	<u>Yes</u> 60%	No agreement reached
Health	<u>Not applicable</u> 70%	<u>Not applicable</u> 90%
Deletion	<u>Unclear</u> 80%	

Goals

- Browser extension showing extracted data practices
 - Provide relevant information to users
 - Easy to understand
 - Make information actionable
 - Enable meaningful comparisons
- Collect users' needs
- Encourage users to contribute annotations
- Enable website operators to clarify practices

Design considerations

- Emphasize unexpected data practices
- Provide assessment of data practices
- Provide alternatives
- Avoid jargon and use simplified non-technical wording
- Leverage interactions (e.g., expandable menus, details on demand)
- Encourage users to contribute to annotations

Mockup 1

- Overall assessment & relative comparison
- summary of user choices
- summary of data practices
- summary rating per category
- user feedback & contribution

My Privacy at [Website]

Worse than at similar websites [\[Learn more\]](#)

Based on privacy policy retrieved on: February 4th, 2015

YOUR CHOICES:

- ▶ Find a privacy-respectful website: [\[Find site\]](#)
- ▶ Block Third-party Trackers: **Block Trackers**
- ▶ Limit Third-party Sharing: [\[URL/email/unavailable\]](#)
- ▶ Limit unrequested Marketing: [\[URL/email /unavailable\]](#)
- ▶ Limit Profiling: [\[URL/email/unavailable\]](#)

What this website does?

- ⊕ Third-parties: **Low Protection** [Learn more](#)
 - Website shares your information with third-parties, you can't limit it
 - Third-parties collect your information on this website, you can limit it
 - Trackers detected on this website
- ⊕ Secondary Uses: **Low Protection** [Learn more](#)
 - Website will send you marketing propaganda, you can't limit it
 - Website may treat you different based on what it learns about you, you can't limit it
 - Website may use your information for other unspecified purposes
- ⊕ Profile Management: **Low Protection** [Learn more](#)
 - You can't delete your user account
 - You can't delete information that the website has collected from you
- ⊕ Data Collection: **Low Protection** [Learn more](#)
 - Website collects your location
 - Website logs more than what is minimally needed to provide service
- ⊕ Policy Changes: **Low Protection** [Learn more](#)
 - Website may change its data practices at any time without providing adequate notice and choices to you
 - Your information may be sold or transferred if the company is acquired by another company without providing adequate choices to you

Dislike anything or want to learn more about this website? [Click Here](#)

The Usable Privacy Project FAQ

Mockup 2

- highlight some practices
- choices and practices integrated
- slider interface to expand practices
- reduced text

NYTimes may treat your data badly

based on current privacy policy from Jan 15, 2015

most news sites do **better!**

why?

● No limits on data use

The website may use your data for any purpose.

see
policy

not
ok?

Risk: they could sell your data to advertisers

● Sharing with third parties

The website shares your data with others, namely advertisers and law enforcement.

see
policy

change
privacy
settings

Risk: you can't control who gets your data

● Few trackers

Some other websites and companies can track you on this website.

see
policy

block
trackers!

Risk: you may not know these trackers, but they learn a lot about you

what data is collected about you?

3

what do third parties learn?

2

can you control your data?

1

Concerned? Tell us!

We will contact the website for you anonymously

Mockup 3

- sorted by good, bad, unclear data practices

NYTimes may treat your data badly

based on current privacy policy from Jan 15, 2015

most news sites do **better!**

Click to see & control what NYTimes can do with your data

good privacy practices

the website informs users about policy changes.

1

unexpected privacy practices

no limits on how data can be used.
data sharing with advertisers.

2

● No limits on data use

The website may use your data for any purpose.

see
policy

not
ok?

Risk: they could sell your data to advertisers

● Sharing with third parties

The website shares your data with others, namely advertisers and law enforcement.

see
policy

change
privacy
settings

Risk: you can't control who gets your data

unclear & unknown practices

1

Concerned? Tell us!

We will contact the website for you anonymously

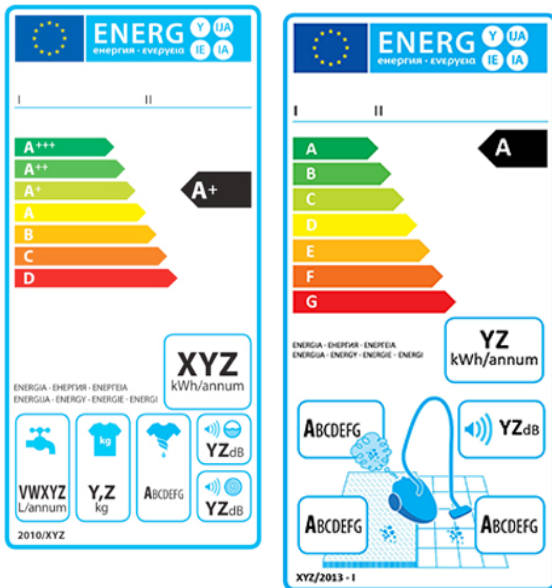
Mockup 4

- emphasize comparison

Website's Data Practices:	
⊕ Third-parties:	Worse than similar sites [Compare]
⊕ Secondary Uses:	Worse than similar sites [Compare]
⊕ Profile:	Worse than similar sites [Compare]
⊕ Data Collection:	Same as similar sites [Compare]
⊕ Policy Changes:	Same as similar sites [Compare]

Mockup 5

- rate website on scale
- give specific alternatives
- inspired by energy labels



NYTimes' privacy rating



based on current privacy policy, last updated on Jan 15, 2015

most news sites do **better!**

here are some privacy-friendly alternatives:

- WashingtonPost.com (A++)
- The Guardian (A+)
- HuffingtonPost.com (A)

NYTimes Privacy Practices in Detail

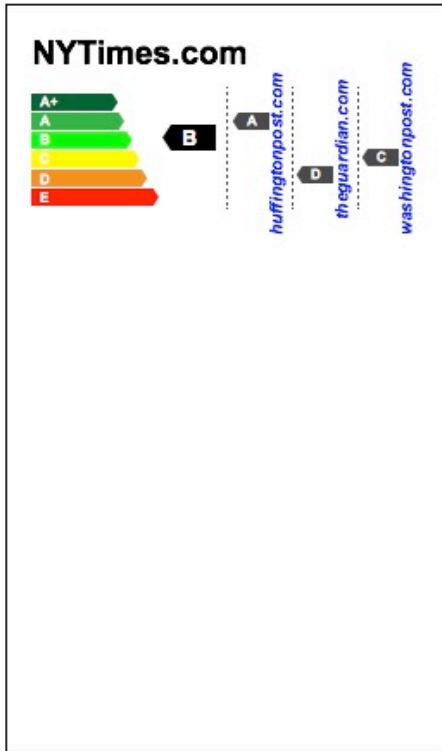
Click a category to see & control what NYTimes can do with your data

data collection	A
third parties	D
choices & control	B

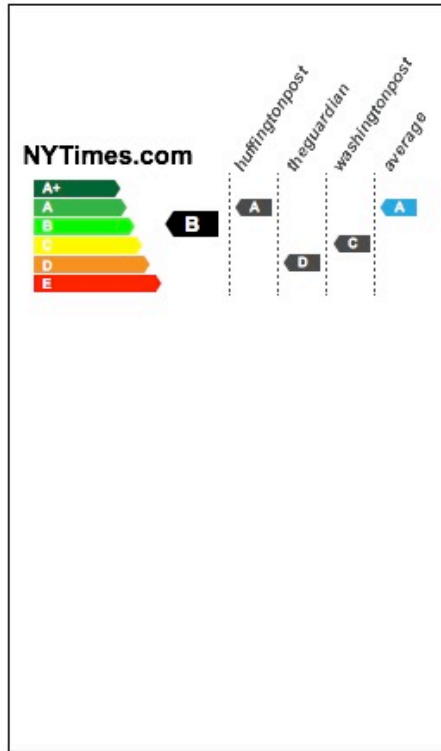
Concerned? Tell us!

We will contact the website for you anonymously

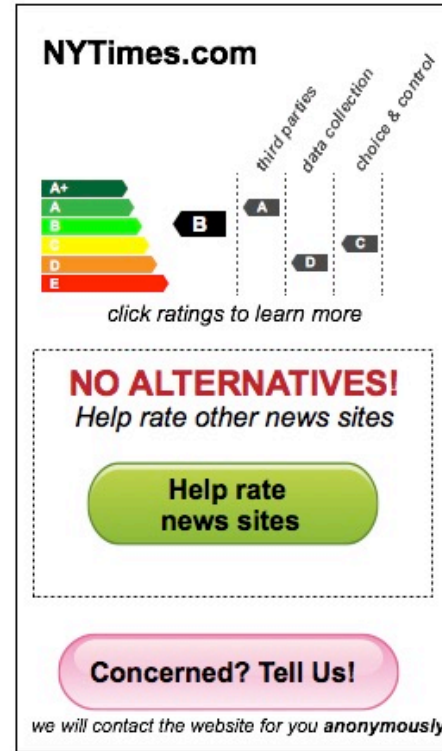
Mockup 6



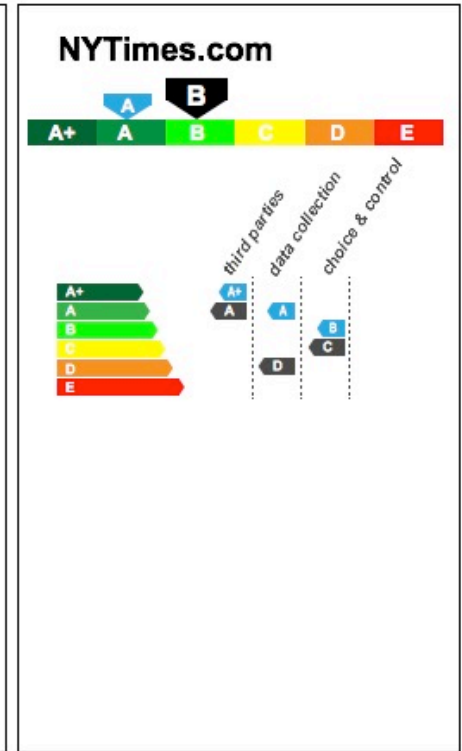
visual ranking of alternatives



visualize average



overall ranking and for data practices



average comparisons

Next steps

- Refine plugin design and build functional prototypes
- 2-4 focus groups
 - test and refine terminology and main UI elements
 - participatory design
- Lab study
 - within subjects study to assess usability of few different variants
- Online or field study
 - evaluate final extension at large scale and in different website contexts

Take-aways

- Semi-automatic extraction of data practices from privacy policies with crowdsourcing and NLP/ML
- Provide notices that are relevant, understandable, and actionable
- Truly interdisciplinary effort

fschaub@cmu.edu

www.usableprivacy.org

Norman Sadeh et al., *The Usable Privacy Policy Project: Combining Crowdsourcing, Machine Learning and Natural Language Processing to Semi-Automatically Answer Those Privacy Questions Users Care About*, Tech. report CMU-ISR-13-119, CMU, December 2013
<http://reports-archive.adm.cs.cmu.edu/anon/isr2013/abstracts/13-119.html>