# Standardizing Privacy Notices: An Online Study of the Nutrition Label Approach

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#### 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.

- What Personal Information About Customers Does Amazon.com Gather?
- What About Cookies?
- Does Amazon.com Share the Information It Receives?
- How Secure Is Information About Me?
- What About Third-Party Advertisers and Links to Other Websites?
- Which Information Can I Access?
- What Choices Do I Have?
- Are Children Allowed to Use Amazon.com?
- Does Amazon.com Participate in the Safe Harbor Program?
- Conditions of Use, Notices, and Revisions
- Examples of Information Collected

#### 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. <u>Click here</u> 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. <u>Click here</u> 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 Communicatione: To help us make emails more useful and interacting, we often relative a continuation when you open e-mail from Amazon.com if your compare supports such capabilities. We also compare now dustamer tool to take necesived them other companies, in an effect to avoid sending unnecessary messages to our customers. If you do not work to receive e-mail ar other mail from us, please edged your <u>Customer</u> Communication Holmman.com

sources and add it to our account information. <u>Click here</u> 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 receptize your browser and to rovide features such as 2-Chile purchasing. tecommended for You, personalized advertisements on other Web sites (e.g., Amazon Associates with content served by Amazon.com and Web sites using Checkout by ment service), and storage of ms in your Shopping Carl between The Heip portion of the toolbar on most browsers all tell you how to prevent your browser from accepting new capities, how to have the browser notify you when you receive a new cookle, or how to disable cookles attogether, Additionally, you can disable or delete similar data used by browser add-one. such as Flash cookies, by changing the add on's settings or visiting the Web site of its nanufacturer. However, because cookies allow you to take advantage of some of Amazon.com/s essential features, we commend that you leave them turned on, r instance, if you block or otherwise reject our cookies, you will not be able to add items to your Shepping Cart, proceed to Checkout, or use any Amazon.com products and toes that require you to Sign in.

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

Momentation about our customers to an important part of our business, and we are not. In the business of setting it is others. We share outsimer' information only as described below and with subsidiaries Amazon.com, Inc. controls that eliter are subject to this Privacy Notice or follow practices at least as protective as these described in this Privacy fostices.

· Affiliated Businesses We Do Not Control: We work closely with affiliated busin 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 sintly with these businesses. Click here for one examples of co-branded and joint offerings. You can tell when a third party is involved in your transactions, and we share uniomer information related to those with that third par Third Party Service Providers: Vic empiry sies and individuats to perform functions on our behalf, Examples include Aufiling orders, delivaring packages, sending postal mail and e-mail, removing repetitive information from customer tota, analyzing data, providing marketing assistance, principling search results and links (including ped listings and links), processing credit card psymetris, and providing customer service. They have access to personal informatio releded to perform their functions, but may not use it for other purposes. Promotional Offers Donetimes 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 restrive such offers, please edget your <u>Contenent Communication</u> Indexember **6 Suriness Transform**: As we continue to develop our business, we wright sell or how stores, substitutions, or business events. In such transactions, customer information generally is one of the transformed business essets but

remains subject to the premises made in any pre-executing Privacy batters (unless, or doarne, the outcome consents otherwise). Allow, in the unlikely event that Amazen.com, Dol, or understending and of as seens are accured, outcome information will of ourse be one of the transformed assets.

release account and other personal information when we ballway release is appropriate to compary with the law, entrince or apply our <u>Conditions</u> of use and other agreements, or pretext the rights, progenity, as safety of Ansaun com, our sens, or others. This includes exchanging information with other compares and organizations for Asial pretections and chalf into reduction. Obviously, however, this does not include estimation devices for commercial purposes in visionation of the commitments set family in the minant of the commitments set family in the

Privacy Notice. • With Year Generatic Other than as not out adver, yns will needle notice when information allowd you might go to thind perties, and you will have an opportunity to choose net to share the information. How Secure Is Enformation About He?

· We work to protect the security of your

Information during transmission by using Secure Sockets Learer (SSL) software, which encrypts information you input. We reveal only the last five digits of your  With Year Generatis Other than as set out above, you will necesse notice when information about you might go to third perties, 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 Benure Bockets Layer (SRJ) software, which encryptic Information you input.
 We reveal only the last five digits of your credit card involves which spontaneous order. Of course, we transmit the antire credit card involves which approximate credit card in number to the appropriate credit card in number to the appropriate credit card in service.

B is important for you to protect against unauthorized access to your password and to your computer. Be sure to sign of 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 bind party Web sites. <u>Click Mark</u> for more information about our Advertising Polices and Searchasters.

These third party Web altes and advertisers, or Internet advertising companies working on their behalf, sometimes use technology to send (or "server") the advertisements that appear on bur Wak alls directly is your browser. They automatically receive your IP address when this happens. They may also use cookies, lavadoript, with basicons (also known as action tags or singlepixel gift), 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 <u>Sedwork Advertising</u> Initiative offers useful information about Internet advertising companies (also called "ad networks" or

"network advertisers"), including information about new to opt-out of their information collection. Amagine, cam also disative personalized third-outly.

advertising based on personal information about customers, such as purchases an Amazon.com, visits to Amazon Associate Web sites, or use of payment services like Checkput by Amazon on other Web altes. 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 ates who bought or browsed for stassisal 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 eccase to a trivial range of information about your eccess to a trivial range of interrections with Amazon com for the limited purpose of vessing and, in certain cases, updating that orderination. <u>Click here</u> 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 these exits provide information, exert though it might be needed to make a purchase or to take advertage of such Amazon.com Restures as <u>True Portine, Walk Lake, Caritement Berleines, and Amazon Johnson</u>.
 You can add or update certain information or pages such as brase referenced in the <u>"Which Entrument, Cari J.Accaust"</u> section. When you update information, we usually keep a ropy of the page version fine care researd.

 If you do not want to receive e-mail or other mail from us, please adjust your <u>Continues</u> <u>Commendation, Performant</u>, (If you do not want to receive <u>Conditions of Use</u> and other legal notices from us, such as the Privacy Value, Pene notices will all general your case of Amagon.com, and it is your responsibility to review them for changes.)
 If you do not want on use personal

information that we gather to allow third parties to personalize advantisements we sloping to you, phase adjust your <u>Advantance</u> trafference.

The heig pertion of the topliar on most between will fell you have to prevent your bornear front location or excision, now to have the locates ratify you when you receive a new costes, or here to distant outside and delete similar data und by browser add ana, such as flash outside, by hereign the addor's settings or visiting the Web site of its manufacture, intervent, because costes aflore you to take advertage of some of Anazon, sam's essential holowas, we recommend they you leave them turned on.

For instance, if you black or other

Are Children Allewed to Use d Amazan.com? Amazan.com? Amazan.com dees not sell products for purchase by children. We sell children's products for purchase by adulta. If you are under 18, you may use a Amazon.com only with the inversement of a parent

or pupplies.

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

Amazon.com is a performant in the faith Hartler program developed by the U.S. Department of Commerce and the European Union. We have confided that we adhere to the Safe Intribe Privacy Principles apreed upon by the U.S. and the E.U. for more information about the Safe Intribe Part wave our certification, visit the U.S. Copartment of Commerce's Earls Factor Web Site. If you would like to certain Amazon.com directly about the Safe marker program, please send an a mail to adhere the Safe Part Interim

#### Conditions of Use, Notices, and Revisions

If you choose to visit Amazon.com, your visit and any dispute over privacy is subject to this hotce. and our Conditions of Use, including traitations 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 contract up with a thorough description, and we will by to resolve it. Our business changes constantly. and our Privacy Rotice and the Conditions of Line ell change also. We may e-mail periodic reminder of our retices and conditions, unless you have instructed us not to, but you should check our Web aits frequently to see recent changes. Unless stated otherwise, our current hvivacy hotics applies to all information that we have about you and you account. We stand beford the promises we make, howmose, and will never materially shange 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

### Canalitions of Jose Decument, Route Decument, Route Community, Rules Mate Assertionst Mater Assert, Auchaese Your Provide and Community, Buildiview

Examples of Information Collected

You provide most such information when you

Information You Give Us

search, buy, bid, post, participate in a contest or questionnairs, or communicate with customer service. For example, you provide information when you search for a product; place an order through Amagon, 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 Time Profile; communicate with us by phone, e-mail, or otherwise; complete a questionnaire or a contast. entry form; compile that Lists or other gift. registries; provide employer information when opening a corporate account; performate 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 these actions, one would 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 number; people (with addresses and phone numbers) listed in L-Click settings; e-mail addresses of Amazon Franks and other people; content of reviews and a 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 callect and analyze include the Internet protocol (IP) address used to connect your computer to the Internet; login; amail 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 apprepris with similar information from other customers to create **Assiures such as Purchase Circles and Tep Sellers:** the full Uniform Resource Locator (URL) clickstream te, 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 pur 802 number. We may also use browner slata such as cookles, Flash cookles (also known as Plash Local Shared Olgects), or similar data on cartain parts of our Web site for fraud prevention and other purposes. During some visits we may use software tools such as Javaticrist to measure and

# Privacy Policies

- Inform consumers about privacy practices
  - Consumers can decide whether practices are acceptable, when to opt-out
- Most policies require college-level skills to understand, long, change without notice
  - Few people read privacy policies

• Existing privacy policies are not an effective way to inform consumers or give them privacy controls

# Privacy Policies Format Study

- Participants answered reading-comprehension and opinion questions about privacy policies in various formats
- Accurate answers to questions where they could find the answer by scanning or key-words
  - Does Acme use cookies? (98%)
- People had trouble with more **reading comprehension** 
  - Does this policy allow Acme to put you on an email marketing list? (71%)
  - Does this policy allow Acme to share your email address with a marketing company that might put you on their email marketing list? (52%)
- Even well-written policies are not well-liked and difficult to use
- Layered notices didn't appear to help much

Can more intentionally designed, standardized privacy policy formats benefit consumers?

### Can more intentionally designed, standardized privacy policy formats benefit consumers?

- Ease of understanding
- Speed of information-finding
- Ability to make comparisons
- Consumer opinion

### Full Policy Text

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- 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

and or give us in any other way. Lick here to see examples of what we collect. You can hoose not to provide certain information, but hen 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

· Automatic Information: we receive and store certain types of information whenever interact with us. For example, like many Web sites, we use "cookies," and we obtain certain types of information when your Webbrowser accesses Amazon.com or provider accesses Amagon.com or advertisements and other context served by or on behalf of Amagon.com on other Web altes. <u>Click here</u> to see examples of the mation we receive. · E-mail Communications: To help us make a-

mala more useful and interesting, we often receive a conformation when you open e-mail from Amazon.com if your computer supports such capabilities. We also compare our justomer tail to tabl received from other impanies, in an effort to avoid sending mecessary messages to our customers. F you do not want to receive e-mail or other mail from us, please adjust your Customer · Information from Other Sources: Vie might receive information about you from other

sources and add it to our account information. Club here to see examples of the information What About Cookies?

 Cookies are alphanumaric identifiers that we transfer to your computer's hard drive through your Web browser to enable our systems to reception your browser and to provide features such as <u>2-Chip</u> purchasing facommended for You, personalized advertisements on other Web sites (e.g., Amazon Associates with content served by Amazon com and their sites using thecknut by Amazon payment service), and storage of learns in payment service), and storage of learns in pay Shapping Carl between visits. • The Heip parton of the toelbar on most browsers all tell you how to prevent your provider from accepting new califies, have to have the browser notify you when you receive a new cookie, or how to disable cookies attogether, Additionally, you can disable or delete similar data used by browser add-one. 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 Shepping Cart, proceed to Checkout, tr use any Amazon.com products and services that require you to Sign In.

#### Does Amazon.com Share the Information **D** Receives?

Information about our customers is an important part of our business, and we are not in the business of setting 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 these described in this Privacy Notice.

· Affiliated Businesses We Do Not Control: We work closely with affiliated businesses. In some cases, such as Marketplace selfers, 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 pinity 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 unioner information related to these transactions with that third party.

• Third Party Service Providers: Vic omploy other companies and individuals to perform functions on our behalf, Examples include functions on our behalf, champes include Auffiling orders, delivaring packages, sending geolal mail and e-mail, removing repetitive information from customer tutz, 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 net use it for other purposes. Promotianal Offers: Sumatimes we ser offers to selected groups of Amazon.com imes we send ountomers 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 rication Preferences.

· Business Transfers: As we continue to develop our business, we might sell or buy stirres, 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 per-existing Privacy Notice (unless mass in any per-existing Privacy Notice (unless, at corres, the custome consents atherwise). Also, in the unlikely event that Amazon.com, Inc., or substantially all of its assets are acquired untomar information will of course be one of Protection of Amazon.com and Others: Inv release account and other personal information when we believe release is appropriate to comply with the tax; enterce or apply our <u>Conditions of use</u> and other agreements; or protect the rights, property, or safety of Amazon.com, our users, or

egal notices from us, such as this Privacy Notice, those notices will still govern your use of Amagon.com, and it is your responsibility others. This includes exchanging information

substantially all of its assets are acquired will of course be one of

 Protection of Amazon.com and Others: 111 velease account and other personal information when we believe release is repriate to comply with the law; enforce or apply our <u>Conditions of uss</u> 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 disclosing personality identification information from customers for commercial purposes in

violation of the commitments set forth in this . With Your Consent: Other than as not out above, you will receive notice when information about you might go to third Are Children Allowed to Use Amagan.com? parties, and you will have an apportunity to

ond and to

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 Amagon, cam only with the involvement of a parent or guardian.

+ The Help portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cackies, now to

have the browser notify you when you receiv

antogether. Additionally, you can disable or delete similar data used by browser add one, such as Plash cookies, by changing the add-

on's settings or visiting the Web site of its

For instance, if you block or otherwise reject

our costenia, or you with not be able to add items to your Stopping Cart, proceed to Oreclosol, or use any Amazon.com products and services that require you to Sign In.

manufacturer, However, because cool after you to take advertisize of some of Amazon com's essential features, we recommend that you leave them turned on.

a new mobile, or how to disable contries

Does Amazon.com Participate in the Safe Harbor Program?

like to contact Amazon.com directly about the Safe

**Conditions of Use, Notices, and Revisions** 

If you choose to visit Amagon.com, your visit and

any dispute over privacy is subject to this hotce.

and our Conditions of Use, including Invitations on

damages, resolution of disputes, and application of

the law of the state of Washington. If you have any

contract up with a thorough description, and we will

by to resolve it. Our business changes constantly.

and our Privacy Notice and the Conditions of Line

of our notices and conditions, unless you have

will change also. We may e-mail periodic reminder

instructed up tot to, but you should that's our Web.

aits frequently to see record changes. Unless stated

otherwise, our current Privacy Notice applies to all

account. We stand beford the promises we make

policies and practices to make them less protective

however, and will never materially change our

of customer information collected in the past

· Your Profile and Community Dublelines

Examples of Information Collected

You provide most such information when you

search, buy, bid, post, participate in a context or

service. For example, you provide information whe

provide information in Your Account (and you might

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 contant.

entry form; compile that Lass or other gift registries; provide employer information when

spening a corporate account; participate in

provide and rate Basiance; specify a Special

Discussion Boards or other community features.

friends; and employ other Personal Notification

Services, such as Available to Order Notifications.

As a result of these actions, uso 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) listed in 2-Club

settings; e-mail addresses of Amazon Friends and

other people; content of reviews and a mails to us;

personal description and photograph in Your Profile.

and financial information, including Social Security

and driver's license numbers.

Automatic Information

addresses and phone number; people (with

Occasion Reminder; shere information with Amazon

have more than one if you have used more than

you search for a product; place an order through

Amazon.com or one of our third-party sellers:

questionnaire, or communicate with customer

without the consent of affected customers.

Related Practices and Information

· Conditions of Line

Decumion Boards
Community Bulks
Tarla Jopenizment

Information You Give Us

Most, Recent, Purchases

information that we have about you and your

concern about privacy at Amazon.com, please

marbor program, please send an e-mail to

Amazon.com is a perticipant in the Safe Harbor program developed by the U.S. Department of Commerce and the European Union. We have cartified that we adhere to the Safe Harber Privacy Principles agreed upon by the U.S. and the E.U. for more information about the fails marbor and to view our certification, visit the U.S. Department of Commerce's Bale Harber Web site. If you would

aafaharbor@umason.com

What About Third-Party Advertisers and Links to Other Websites? Our site includes third party advertising and links to

rahed using a shared computer. Click here

Wiwacy Rodice.

choose not to share the information.

How Secure 1s Information About Me?

· We work to protect the security of your

monypta information you input.

. We reveal only the last five digits of your oradit card numbers when cardining an order. Of course, we transmit the entire credit card number to the appropriate credit.

and company during order processing. · It is important for you to protect against

unauthorized access to your password any your computer. Be sure to sign off when

for more information on how to sign off

information during transmission by using Secure Sockets Layer (SSL) software, which

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 Resolutions.

These third party Web altes and advertisers, or Internet advertising companies working on their behalf, sometimes use technology to send (or "serve") the advertisements that appear on bur Wak also directly to your browser. They automatically receive your IP address when this happens. They may also use cookies, lavafloript, web beacons (also known as action tags or singlepixel gift), 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 Industry Advertising Initiative offers useful information about Internet advertising comparies (also called "ad networks" or

how to opt-out of their information collection. Amazon, cam also displays personalized third-party advertising based on personal information about customers, such as purchases an Amazon.com, visits to Amazon Associate Web sites, or use of payment services like Checkout by Amazon on other Web altes. Click here for more information about the personal information that we gether. Atthough Amazan.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

setwork advertisers"), including information about

Blates 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 Advections, Professorae.

ad the example, users in the northwestern United

#### 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.

#### 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 Restures as Your Profile, Wah Lots, Customer Reviews, and Amazon Prime.

You can add or update certain information or pages such as hose referenced in the "<u>Which</u> thromation can 1 Access" section. When you pdate information, we usually keep a copy of the prior version for our records. F you do not want to receive a mail or other mail from us, please adjust your <u>Customer</u> Communication Profesences. (27 year do not want to receive Conditions of Use and other

Examples of the information we collect and analyze include the Internet protocol (IP) address used to convect your computer to the Internet; login; email address; password; computer and correction information such as browser type, version, and

# Layered Policy

### **Acme Privacy Notice Highlights**

Scope

(last updated May 2008)

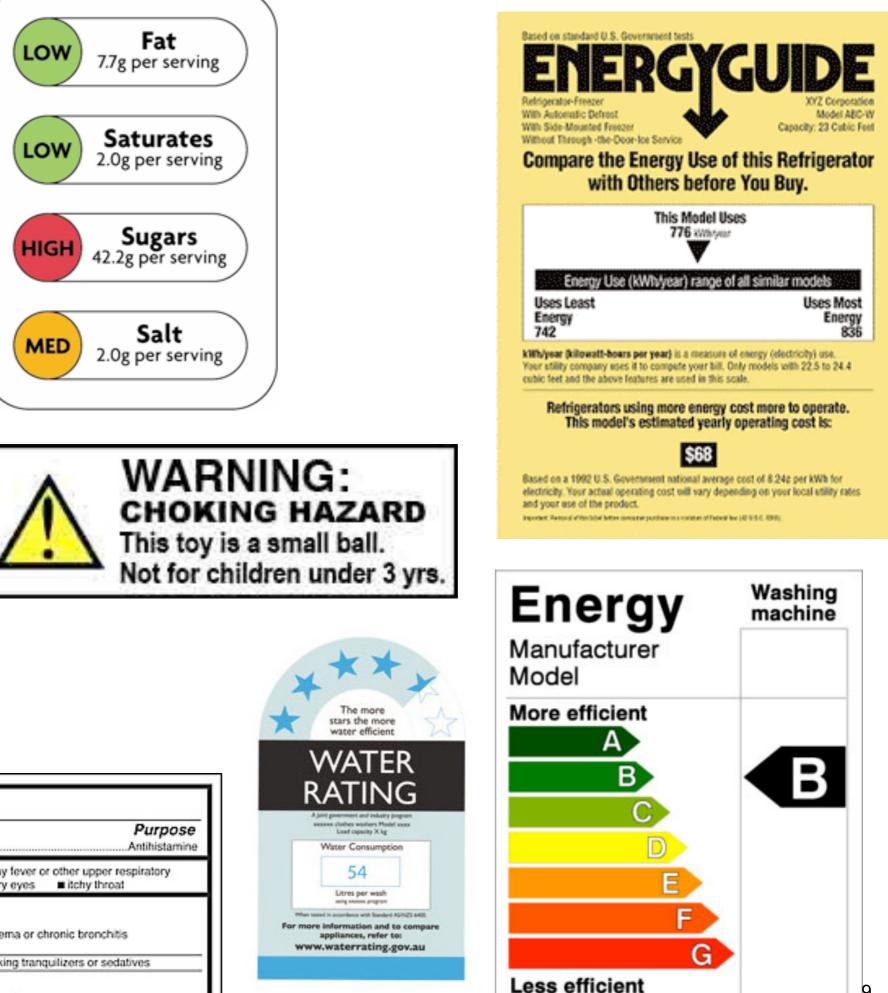


This notice provides highlights of the full Acme Online Privacy Statement. This notice and the full privacy statement apply to those Acme Web sites and services that display or link to this notice.

Personal Information	Your Choices			
<ul> <li>When you register for certain Acme services, we will ask you to provide personal information.</li> <li>The information we collect may be combined with information obtained from other Acme services and other companies.</li> <li>We use cookies and other technologies to keep track of your interactions with our sites and services to offer a personalized experience.</li> </ul>	<ul> <li>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.</li> <li>To make proactive choices about how we communicate with you by e-mail, telephone, and postal mail, follow the instructions listed in the <u>Communication Preferences</u> of the full privacy statement.</li> <li>To opt-out of the display of personalized advertisements, go to the <u>Display of Advertising</u> section of the full privacy statement.</li> <li>To view and edit your personal information, go to the <u>access section</u> of the full privacy statement.</li> </ul>			
Uses of Information	Important Information			
<ul> <li>We use the information we collect to provide the services you request. Our services may include the display of personalized content and advertising.</li> <li>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.</li> <li>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.</li> </ul>	<ul> <li>The full <u>Acme Online Privacy Statement</u> contains links to supplementary information about specific Acme sites or services.</li> <li>The sign in credentials (e-mail address and password) used to sign in to most Acme sites and services are part of the <u>Acme Networks</u>.</li> <li>For more information on how to help protect your personal computer, your personal information and your family online, visit our <u>online safety resources</u>.</li> <li>Acme is a member of the <u>TRUSTe</u> privacy seal program.</li> </ul>			
How to Contact Us				
For more information about our privacy practices, go to the full <u>Acme Online Privacy</u> <u>Statement</u> . Or write us using our <u>Web form</u> . If you have a technical or general support question, please visit <u>http://support.Acme.com</u> to learn more about Acme Support offerings.				
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Nutri	tior	n Fa	cts	
Serving Size 1	cup (228a)			
Serving Per Co				
Amount Per Serv				
Calories 250	Cak	ories fron	n Fat 110	
	%	Daily Val	ue*	
Total Fat 12g	,		18%	
Saturated Fat 3g				
Cholesterol 30mg				
Sodium 470mg				
Total Carboh	ydrate 3	1g	10%	
Dietary Fiber Og				
Sugars 5g				
Protein 5g				
Vitamin A			4%	
Vitamin C			2%	
Calcium			20%	
Iron				
* Percent Daily Valu Your Daily Values n your calorie needs:	nay be higher	· · · · ·		
Total Fat	Less than	65g	80g	
Sat Fat	Less than	20g	25g	
Cholesterol Sodium	Less than Less than	300 mg 2,400 mg	300mg 2,400 mg	
Total Carbohydrate	Loss that	2,400 mg	375g	
		25g	30g	

Active ingredient (in each tablet) Chlorpheniramine maleate 4 mg	Purpose Antihistamine
Uses temporarily relieves these symptoms due to hay fever or oth allergies: sneezing runny nose itchy, watery eyes	er upper respiratory itchy throat
Warnings Ask a doctor before use if you have glaucoma a breathing problem such as emphysema or chroni trouble urinating due to an enlarged prostate gland	ic bronchitis
Ask a doctor or pharmacist before use if you are taking tranquiliz	ters 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 consumption

9

1 75

### Iterative Design Approach

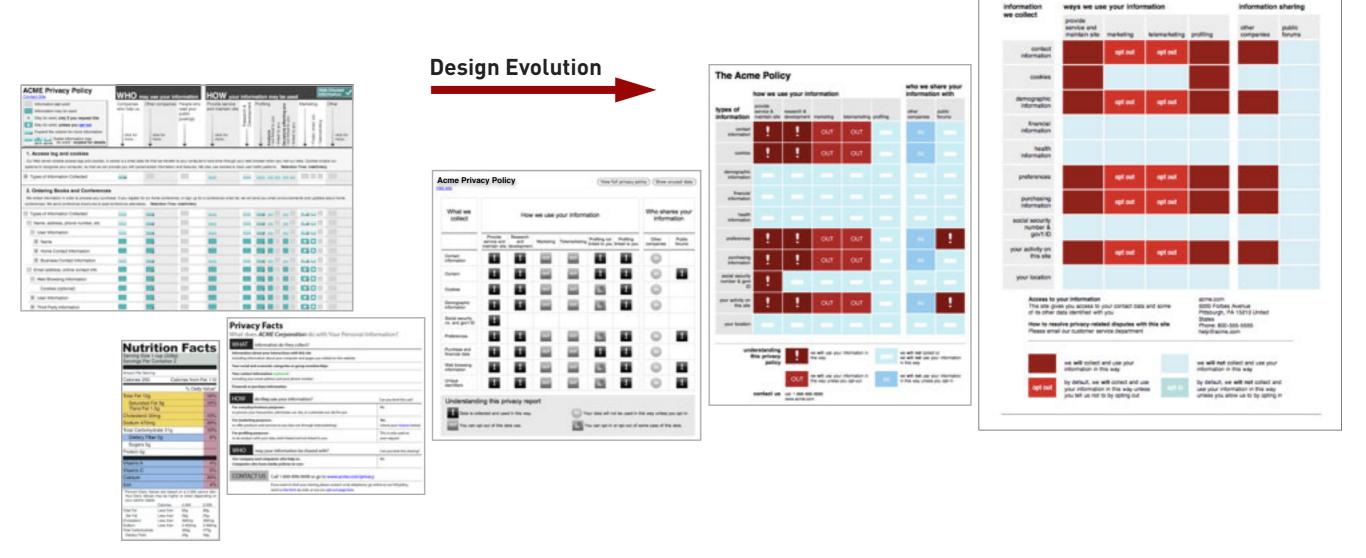
### 5 focus groups

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

Laboratory Study

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

# Design Evolution

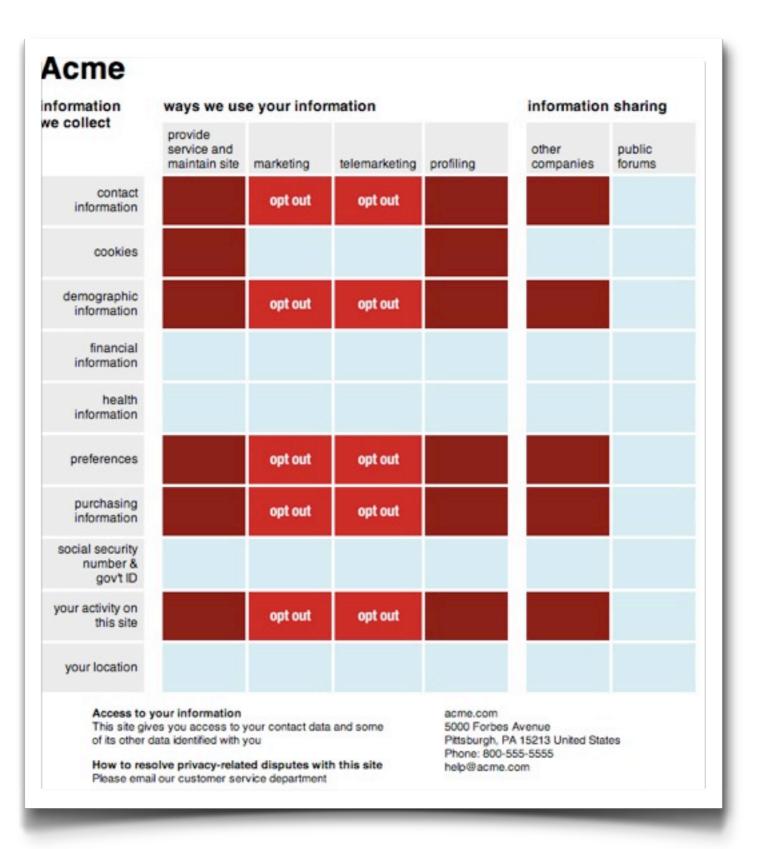


### **Final Proposed Design**

Acme

Patrick Gage Kelley, Joanna Bresee, Lorrie Faith Cranor, and Robert W. Reeder. A "Nutrition Label" for Privacy. SOUPS 2009.

### Standardized Label

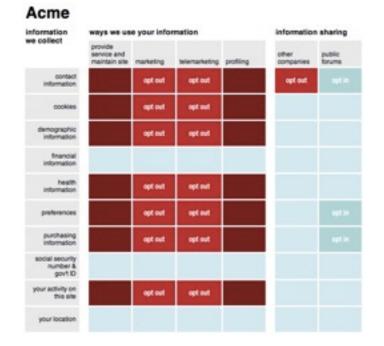


Removes wiggle room and complicated terminology by using four standard symbols

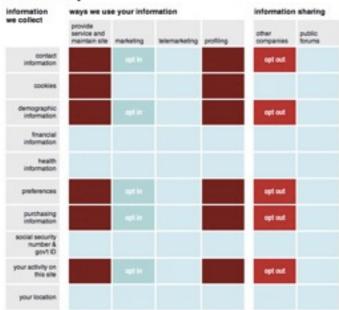
13

### Acme

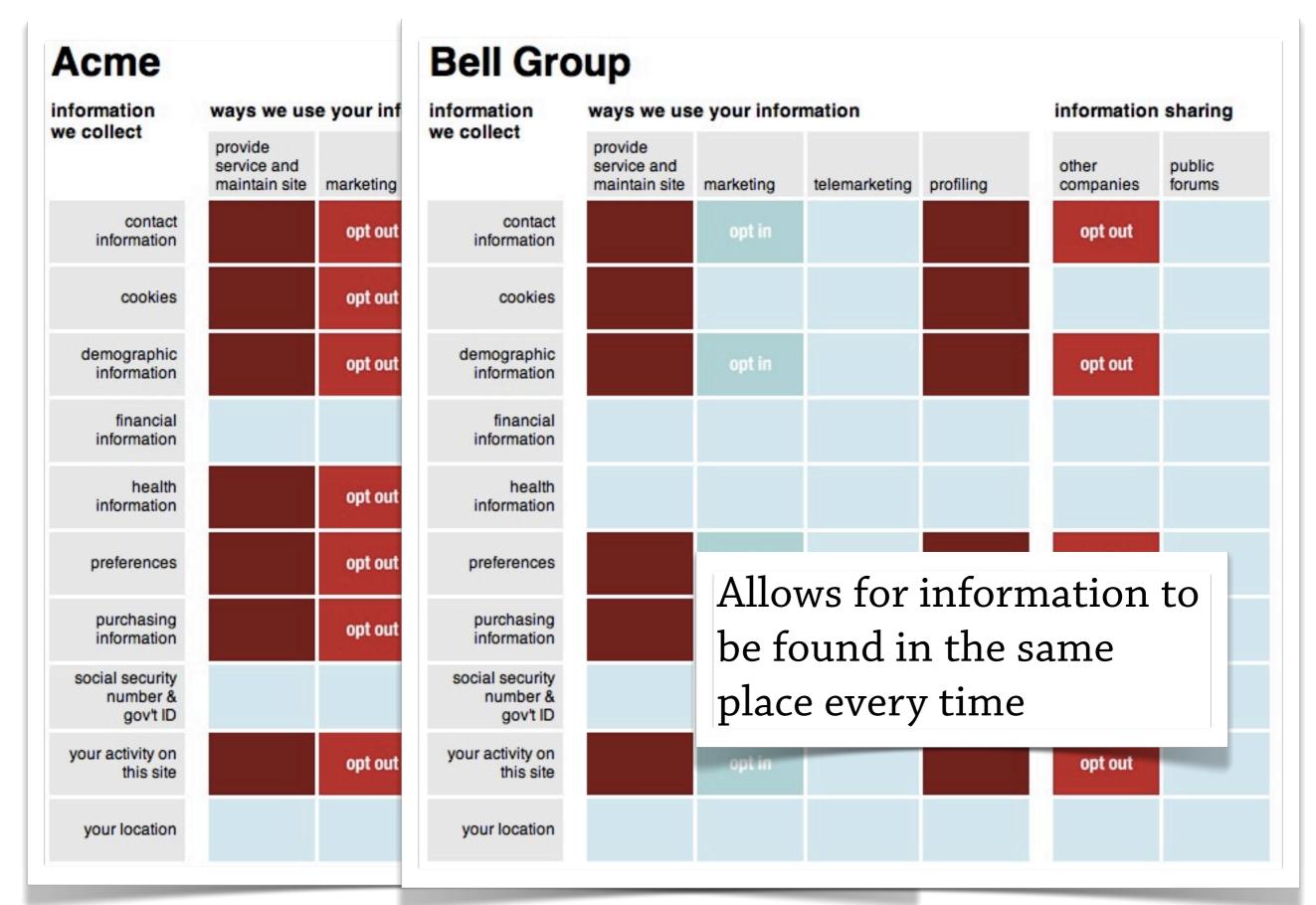
information	ways we use your information				information sharing	
we collect	provide service and maintain site	marketing	telemarketing	profiling	other companies	public forums
contact information		opt out	opt out		opt out	opt in
cookies		opt out	opt out			
demographic information		opt out	opt out			
financial information						
health information		opt out	opt out			



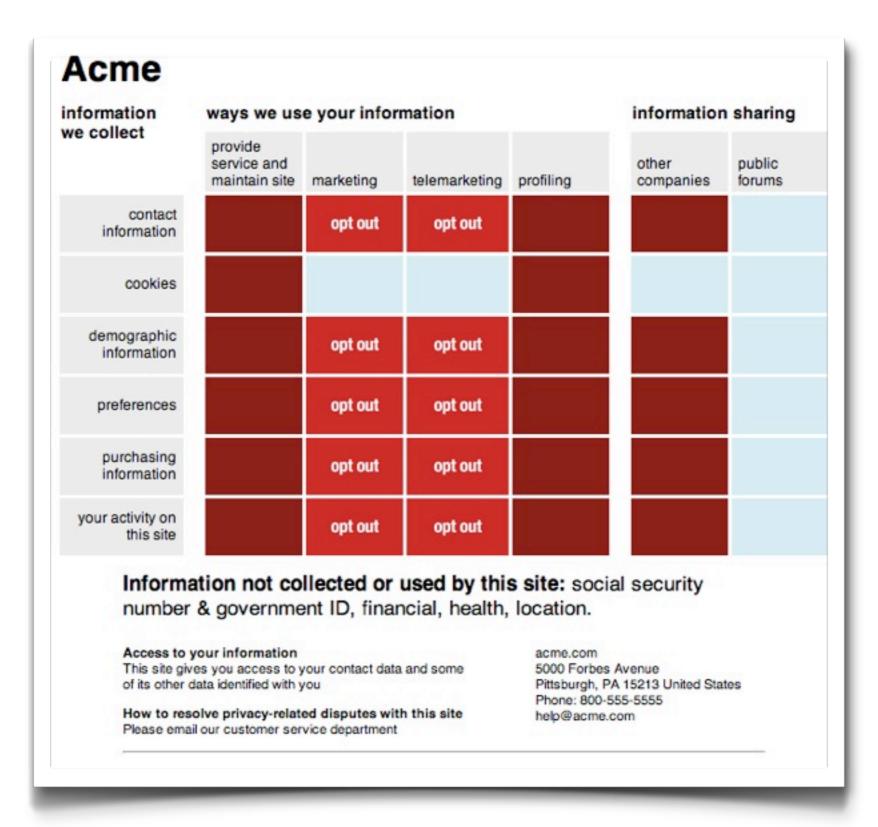
#### **Bell Group**



Allows for quick highlevel visual feedback by looking at the overall intensity of the page

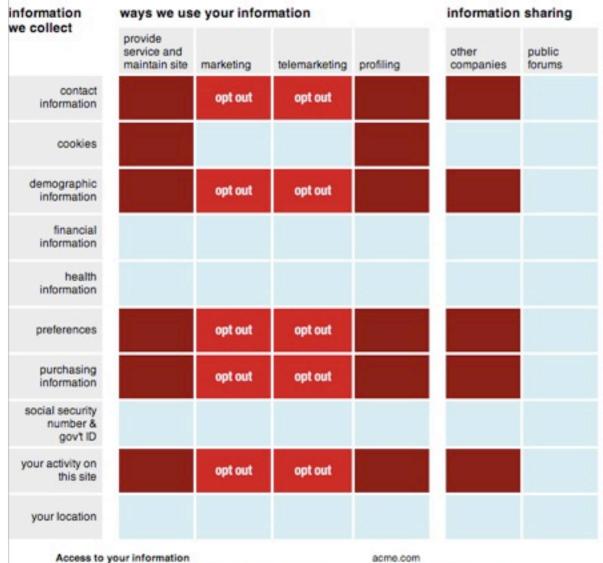


### Standardized Short Label



### Labels Compared

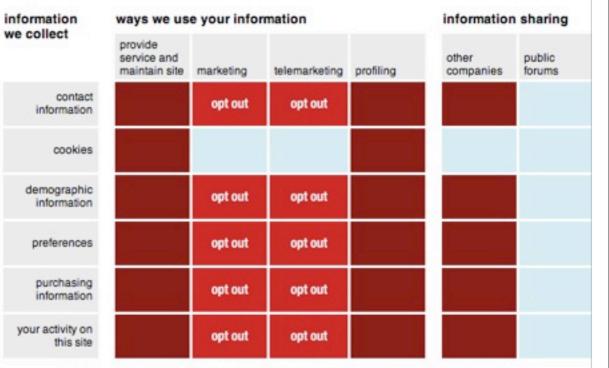
#### Acme



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

### Short Standardized Text

### 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

### Legend & Definitions

we

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 opt in

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

we will not collect and use your

information in this way

### Definitions

#### contact information

opt out

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

Financial information may include your accounts, balances, and transactions.

### 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.

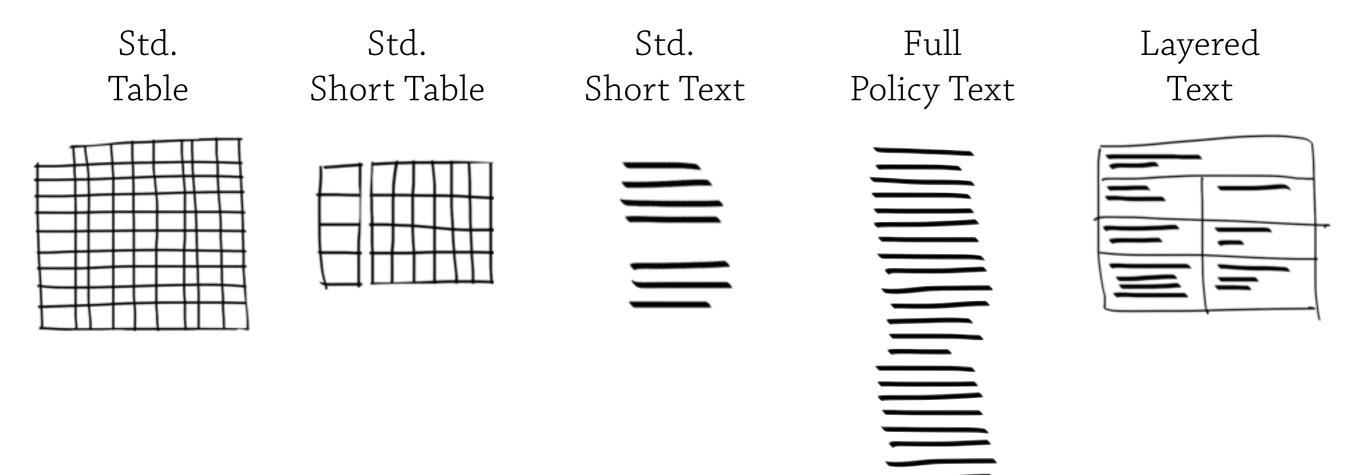
### social security number & govt ID

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

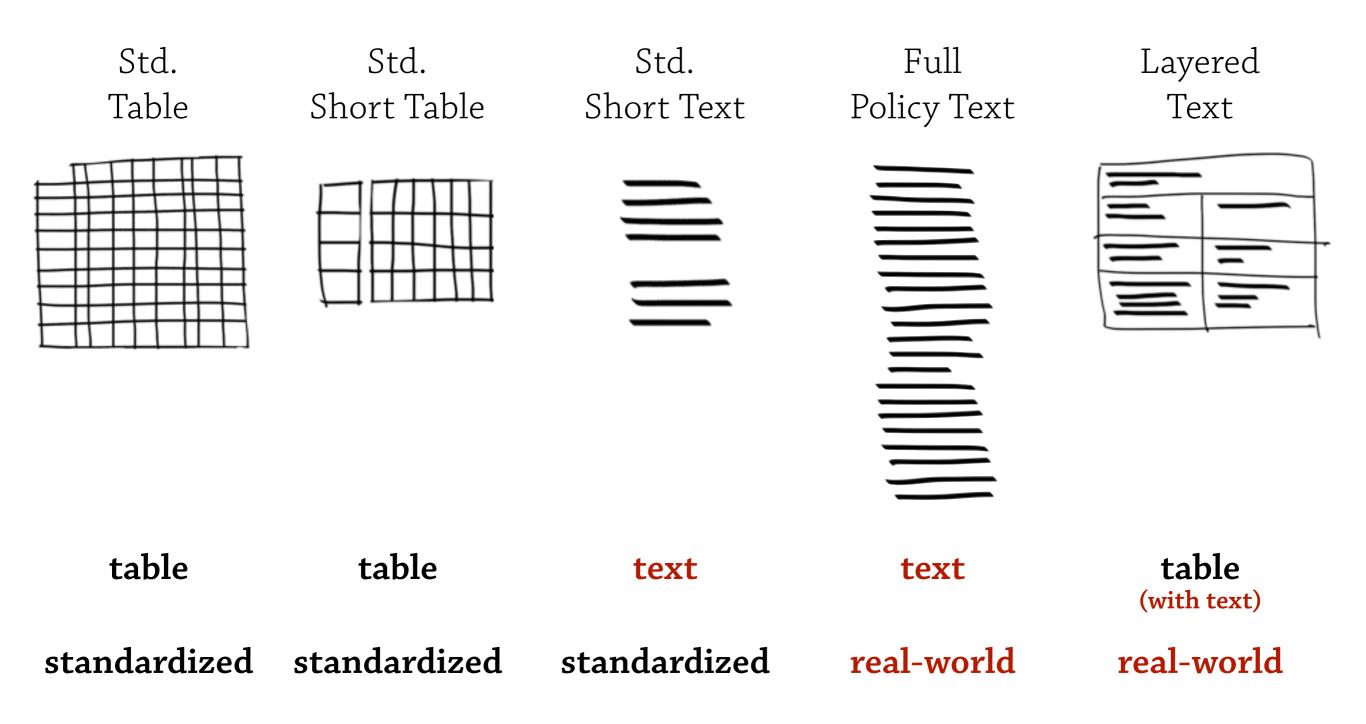
### telemarketing

Contacting you by telephone to market services or

# Five Formats Compared



# Five Formats Compared



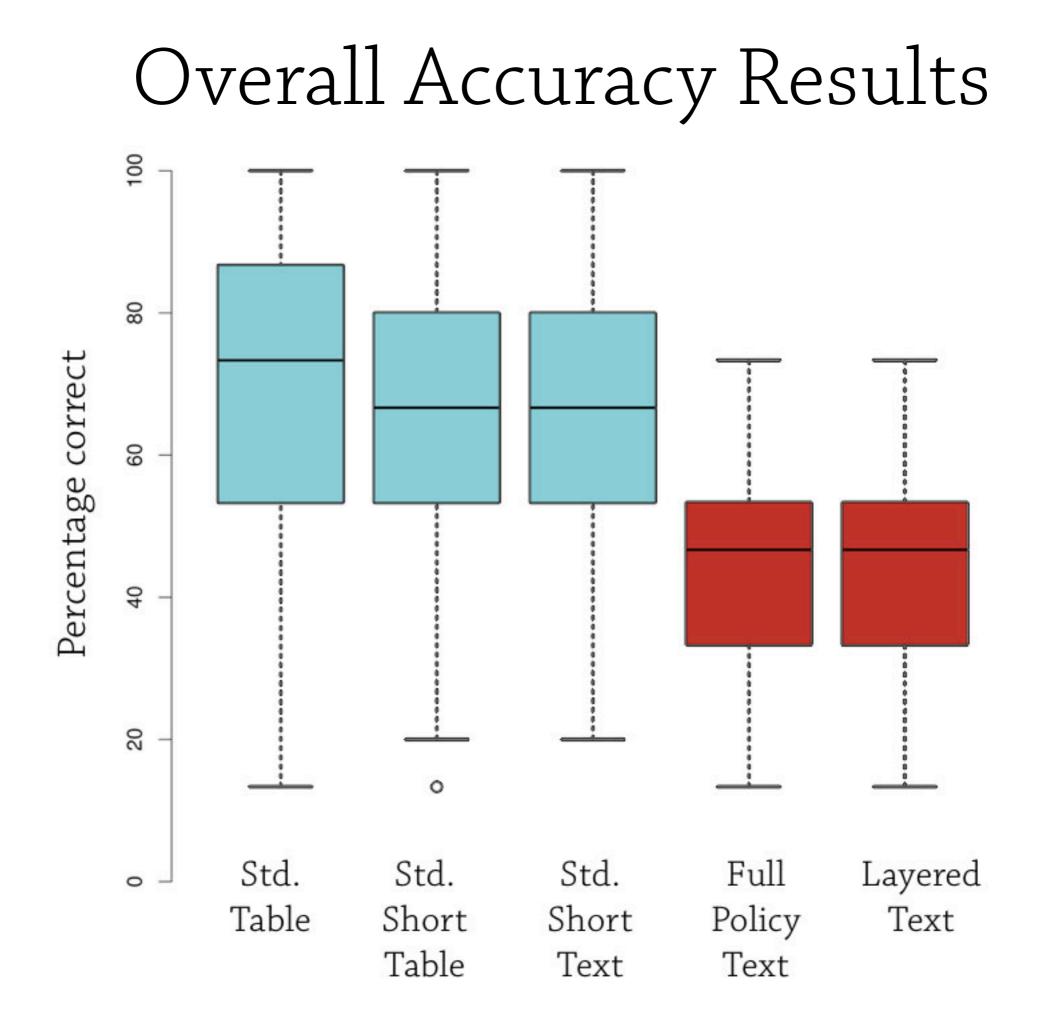
### User Testing

### Amazon's Mechanical Turk

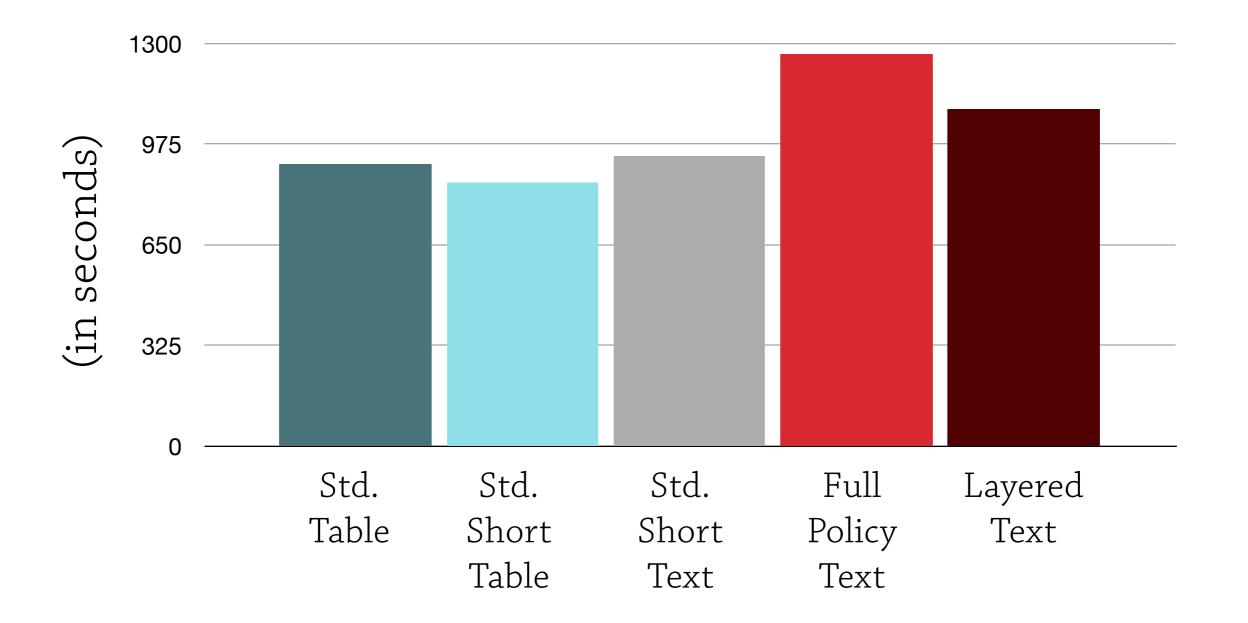
- 764 participants
- between subjects design
- average time to complete ~15 minutes

# Study Questions

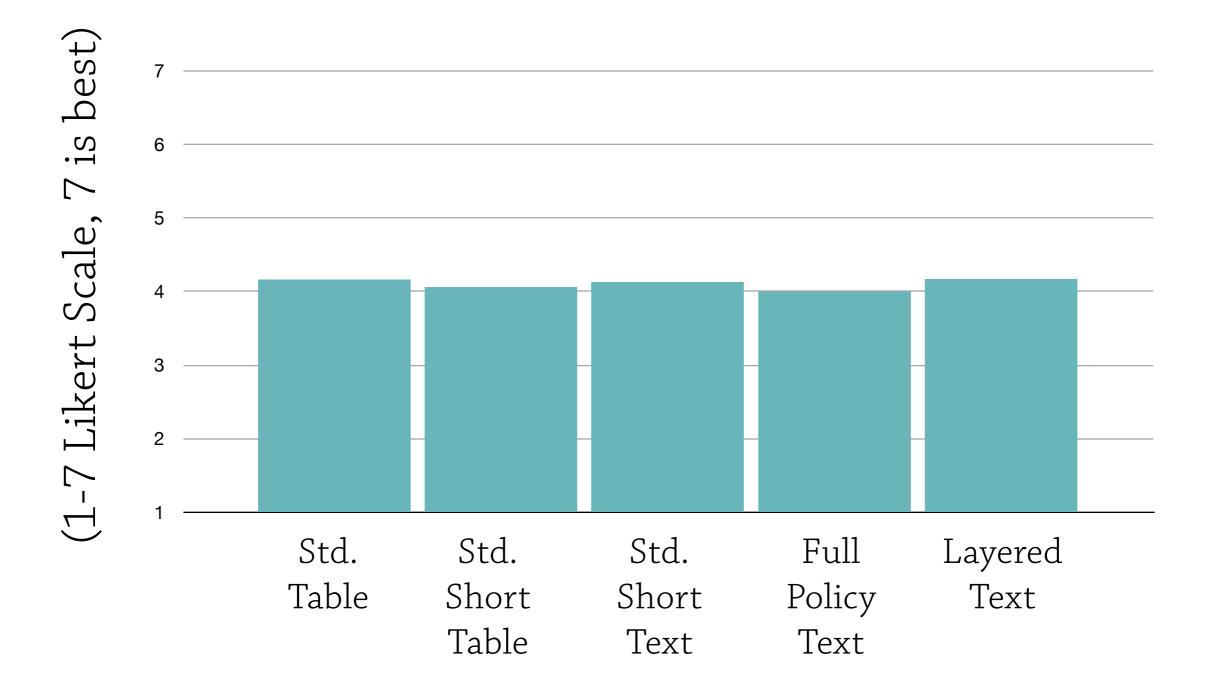
- Demographics
- Internet and Privacy
- Simple Tasks
  - Can be answered from single row or column
- Complex Tasks
  - Interaction between rows and columns
- Single Policy Likeability
- Comparison Tasks
- Policy Comparison Likeability



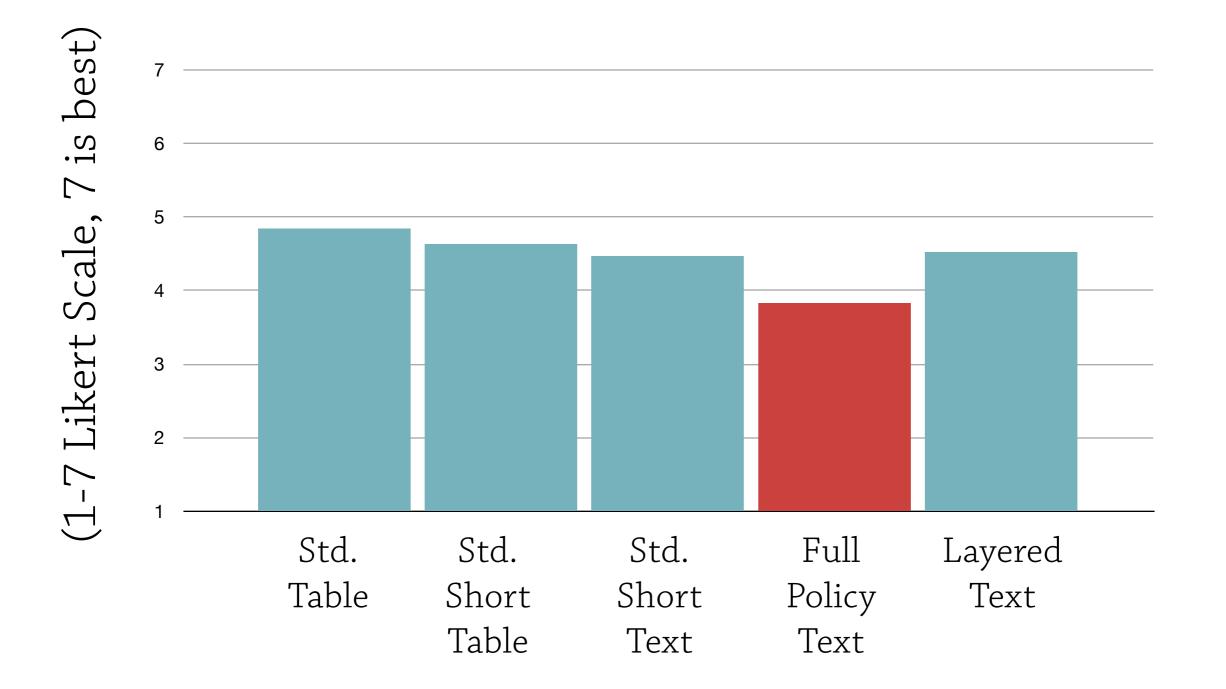
# Timing Results



# Enjoyability - Single Policy



# Enjoyability - Comparisons



# Participant Comments

- The full policy text described as:
  - "torture to read and understand"
  - likened them to "Japanese Stereo Instructions"
- The standardized-format were more complimentary:
  - "This layout for privacy policies is MUCH more consumer friendly. I hope this becomes the industry standard"

### Standardized formats outperformed text and layered formats

Benefits of standardized approach:

- Structured information presentation
- Clear labeling of information that is not used or collected
- Standardized terminology to minimize length and increase the clarity of the text
- Definitions of standardized terms

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 Bell Group, (b) The Bell Group 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 Bell Group 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

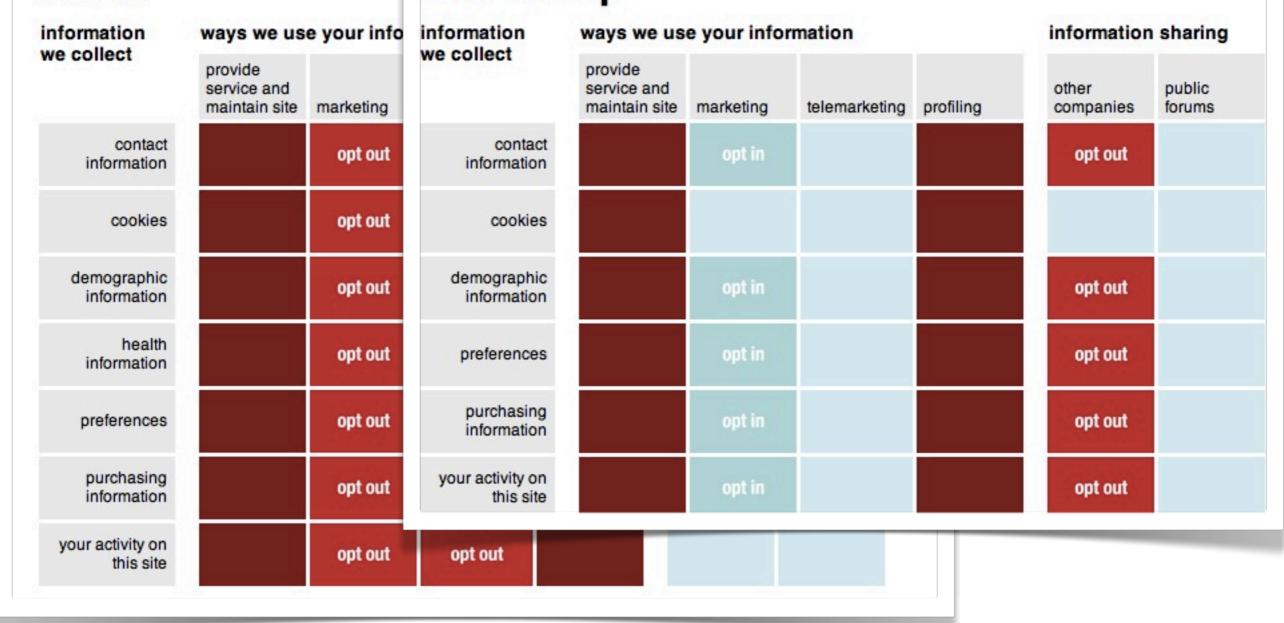
30

# Minor differences between standardized formats

Standardized table presents holistic view of policy

Short table takes up less space but sometimes makes comparison tasks and tasks about data not collected more difficult

Text doesn't scale well for complex policies, people more likely to miss text in the middle of paragraphs



11

### **Bell Group**

Acme

### Acme

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### Information not collected or used by this site:

financial, SSN or government ID, and location.

# Layered policy did not perform well

Layered performed similarly to full policy

Some information was not in layered policy yet few people clicked through to full policy to look for it

Layered not standardized enough – many differences between companies •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.

to

•T

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C

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•When you register for certain A one services we will ask you

### **Collection of Your Personal Information**

At some Acme sites, we ask you to provide personal information, such as your e-mail address, name, home or address, or telephone number. We may also collect demographic information, such as your ZIP code, age, ge preferences, interests and favorites. If you choose to make a purchase or sign up for a paid subscription servic ask for additional information, such as your credit card number and billing address, which is used to create a A account.

In order to access some Acme services, you will be asked to sign in with an e-mail address and password, where refer to as your Acme ID or Acme credentials. You can use the same credentials to sign in to many different Action and services, as well as those of select Acme partners. By signing in on one Acme site or service, you may be automatically signed into other Acme sites and services. If you access our services via a mobile phone, you muse your telephone number and a PIN as an alternative credential to your username and password. As part of your credentials, you may also be requested to provide questions and secret answers, which we use to help videntity and assist in resetting your password, as well as an alternate e-mail address. Some services may require security, and in these cases, you may be asked to create an additional security key. Finally, a unique ID numb assigned to your credentials which will be used to identify your credentials and associated information.

We may collect information about your interaction with Acme sites and services. For example, we may use we analytics tools on our site to retrieve information from your browser, including the site you came from, the search engine(s) and the keywords you used to find our site, the pages you view within our site, your browser add-one browser's width and height. We may also use technologies, such as cookies and web beacons (described bell collect information about the pages you view, the links you click and other actions you take on our sites and see Additionally, we collect certain standard information that your browser sends to every website you visit, such a address, browser type and language, access times and referring Web site addresses. We also deliver advertise (see the Display of Advertising section below) and provide Web site analytics tools on non-Acme sites and ser we may collect information about page views on these third party sites as well.

### Can more intentionally designed, standardized privacy policy formats benefit consumers? **Yes**.

- Ease of understanding
- Speed of information-finding
- Ability to make comparisons
- Consumer opinion

# Ongoing Work

- Integration into http://privacyfinder.org/
- Make the label interactive
- Real-world field studies
- Test with a major search engine?

Try it yourself

http://privacyfinder.org

http://cups.cs.cmu.edu/privacylabel



### http://cups.cs.cmu.edu

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with Lucian Cesca, Joanna Bresee, and Lorrie Faith Cranor

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