

Privacy regulation and self-regulation

Rebecca Balebako

Lorrie Faith Cranor

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Privacy Policy, Law, and Technology



By the end of class, you will be able to

- List ways companies in the US have self-regulated privacy protection
- Describe pros and cons of privacy policies

Privacy self-regulation

- Since 1995, the US FTC has pressured companies to “self regulate” in the privacy area
- Self regulation may be completely voluntary or mandatory (or somewhere in between)

Self-regulatory programs and initiatives

- CPOs
- Seals
- Privacy policies
- Standards – P3P and DNT
- Multi-stakeholder agreements (NTIA)
- Industry guidelines
- Voluntary compliance (safe harbor)



Privacy Office

Authorities and Responsibilities

[Contacts](#)

Authorities and Responsibilities of the Chief Privacy Officer

The activities of the Privacy Office serve to build privacy into departmental programs. The following is a framework of privacy laws through which the Privacy Office accomplishes its activities and mission:

- Privacy Act of 1974, as amended (5 U.S.C. § 552a): Embodies a code of fair information principles that governs the collection, maintenance, use, and dissemination of personally identifiable information by federal agencies;
- E-government Act of 2002 (Public Law 107-347): Mandates Privacy Impact Assessments (PIAs) for all Federal agencies when there are new collections of, or new technologies applied to, personally identifiable information;



SECURITY ADVISER

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Why your company needs a chief privacy officer

Chief privacy officers

- Companies are increasingly appointing CPOs to have a central point of contact for privacy concerns
- Role of CPO varies in each company
 - Draft privacy policy
 - Respond to customer concerns
 - Educate employees about company privacy policy
 - Review new products and services for compliance with privacy policy
 - Develop new initiatives to keep company out front on privacy issue
 - Monitor pending privacy legislation

Some States have CPOs

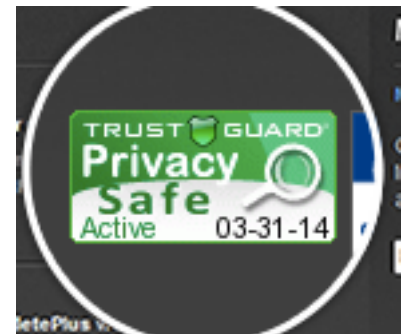
- Arizona, Ohio, West Virginia, South Carolina
- Others may have CIO/CISO with privacy responsibilities
- State budgets may be a limiting factor

Seal program problems

- Certify only compliance with stated policy
 - Limited ability to detect non-compliance
- Minimal privacy requirements
- May not address privacy issues that go beyond the web site
- Nonetheless, reporting requirements are forcing licensees to review their own policies and practices and think carefully before introducing policy changes

Seal programs

- TRUSTe – <http://www.truste.org>
- Japanese Privacy Mark
- Trust Guard



Standards

- Several standards-setting bodies
 - W3C
 - ISO (cloud privacy)
 - NIST (Guide to Protecting the Confidentiality of Personally Identifiable Information (PII))

Multi-stakeholder agreements

- National Telecommunication and Information Administration tasked with holding privacy multi-stakeholder agreements
 - Mobile App Transparency
 - Facial Recognition
 - Unmanned Aircraft

FTC Privacy Framework (2012)

- Privacy by Design
 - incorporate substantive privacy protections
 - maintain comprehensive data management procedures
- Simplified Consumer Choice
 - Companies should simplify consumer choice.
- Transparency
 - Privacy notices
 - Access
 - Consumer Education

Privacy policies

- Inform consumers about privacy practices
- Important part of privacy self regulation
- Consumers can decide whether practices are acceptable, when to opt-out
- Existing privacy policies are not an effective way to inform consumers or give them privacy controls

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

- **E-mail Communications:** 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 supports such capabilities. We also compare our customer list to lists received from other companies, in an effort to avoid sending unnecessary messages to our customers. If you do not want to receive e-mail or other mail from us, please adjust your [Customer Communication Preferences](#).
- **Information from Other Sources:** We might receive information about you from other sources and add it to our account information. [Click here](#) to see examples of the information we receive.

What About Cookies?

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

Does Amazon.com Share the Information It Receives?

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

Affiliated Businesses We Do Not Control:

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

How Secure Is Information About Me?

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

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

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

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

Amazon.com also displays personalized third-party advertising based on personal information about customers, such as purchases. Amazon.com visits to Amazon Associate Web sites, or use of payment services like Checkout by Amazon on other Web sites. [Click here](#) for more information about the personal information that we gather.

Although Amazon.com does not provide any personal information to advertising advertisers (including ad-serving companies) may assume that users who interact with or click on a personalized advertisement meet their criteria to personalize the ad (for example, users in the northwestern United States who bought or browsed for classical music). If you do not want us to use personal information that we gather to allow third parties to personalize advertisements we display to you, please adjust your [Advertising Preferences](#).

Which Information Can I Access?

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

What Choices Do I Have?

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

Are Children Allowed to Use Amazon.com?

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

Does Amazon.com Participate in the Safe Harbor Program?

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

Conditions of Use, Notices, and Revisions

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

Related Practices and Information

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

Examples of Information Collected

Information You Give Us

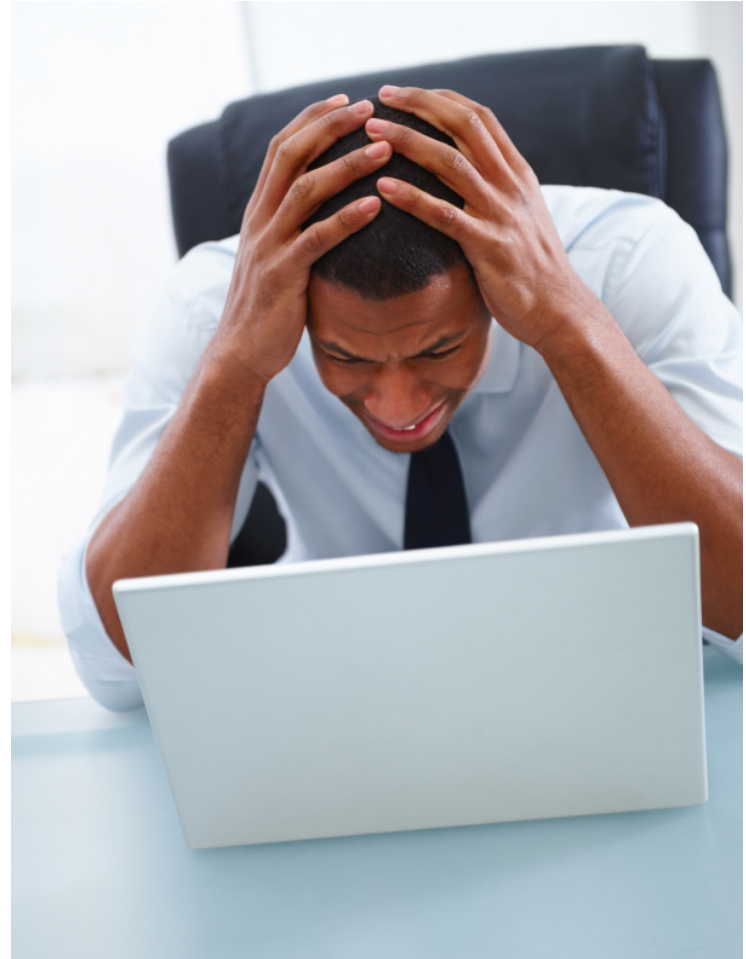
You provide most such information when you search, buy, bid, post, participate in a contest or questionnaire, or communicate with customer service. For example, you provide information when you search for a product, place an order through Amazon.com or one of our third-party sellers; provide information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

Automatic Information

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

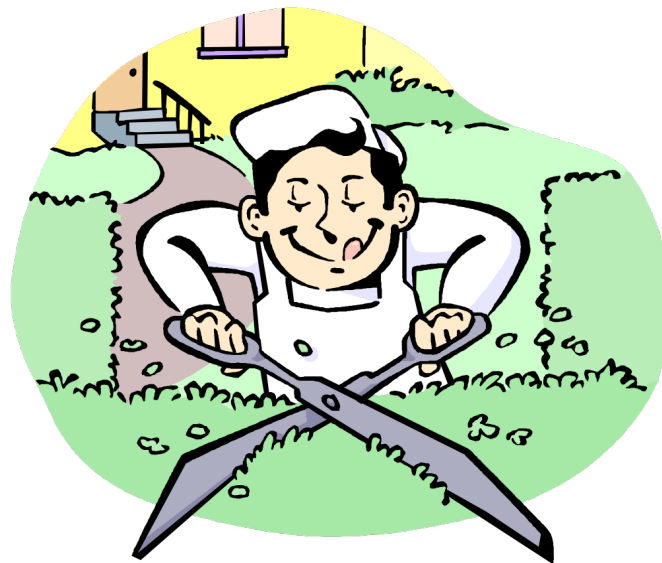
What's wrong with privacy policies?

- Long
- Require college-level reading skills
- Include legalese and obfuscated language
- Difficult to compare
- May change at any time without notice



Typical policies have > 20 hedging claims

- may
- might
- perhaps
- in/at our discretion
- except as
- on a limited basis
- we reserve the right to
- including but not limited to



- Pollach, I. 2007. What's wrong with online privacy policies?. Commun. ACM 50, 9 (Sep. 2007), 103-108. DOI=<http://doi.acm.org/10.1145/1284621.1284627>

“Nonetheless, except as separately permitted by other provisions of this Privacy Policy, these companies are allowed to gather, receive, and use your information only for the purposes described in this paragraph or to facilitate compliance with laws.”

Privacy policy components

- Identification of site, scope, contact info
- Types of information collected
 - Including information about cookies
- How information is used
- Conditions under which information might be shared
- Information about opt-in/opt-out
- Information about access
- Information about data retention policies
- Information about seal programs
- Security assurances
- Children's privacy

There is lots of information to convey -- but policy should be brief and easy-to-read too!

Short Notices

- Project organized by Hunton & Williams law firm around 2002
 - Create short version (short notice) of a privacy notice
 - Sometimes called a “layered notice” as short version would advise people to refer to long notice for more detail
 - Now being called “highlights notice”
 - Focus on reducing privacy policy to at most 7 boxes
 - Standardized format but only limited standardization of language
- Alternative proposals from privacy advocates focused on check boxes

P&G Privacy Notice

Scope

P&G's Global Consumer Privacy Policy applies to consumer information, including personal information, collected and used by **The Procter & Gamble Company** and its affiliated companies and subsidiaries ("P&G").

To read P&G's full Global Consumer Privacy Policy [click here](#).

Information P&G Collects

[Click here](#) for more information

- P&G collects information about you from a variety of sources, including:
 - Information we collect from you directly.
 - Information we collect about you when you call us, visit our sites, use our mobile applications or services, or view our online advertisements.
 - Information we collect about you from other sources, such as commercially available sources.
- All the information P&G collects about you may be combined to improve our communications with you, and to develop world-class products and services.

Uses / Information Sharing

[Click here](#) for more information

- P&G uses the information we collect for P&G business purposes such as:
 - To provide the products and services you request.
 - To tell you about P&G products and services and those offered by our carefully selected business partners.
 - To manage our sites and services.
- We do not sell your personal information to marketing companies outside of P&G.
- We may share your information:
 - With our carefully selected business partners for co-promotions or other joint programs, but only if we have obtained your consent.
 - With our third-party service providers who perform P&G business operations on our behalf.
 - With our third-party service providers who work on behalf of P&G and our business partners to send you joint communications that we hope you find of interest.
 - As part of a sale of a P&G brand to another company.
 - To protect and defend P&G (including enforcing our Terms and Conditions).
 - When required by law and/or government authorities.
- If you do not wish to provide your personal information to us, we may not be able to provide the products and services you request, or to tell you about other products and services offered by P&G.

Your Choices

[Click here](#) for more information

- You can stop receiving promotional email or postal communications from P&G by following the instructions in those messages, or through this Privacy Notice. Please [click here](#) to select your country and learn how to unsubscribe.
- [Click here](#) to select your country and learn how to access and update information you provide to P&G.

Important Information

- P&G is committed to working with consumers and data protection authorities to resolve any privacy concern.
- P&G complies with country data protection laws.
- P&G self-certifies compliance with the [U.S.-EU Safe Harbor Program](#).
- P&G participates in the US Council of [Better Business Bureau's \(BBB\)](#) Accredited Business Program and BBB EU Safe Harbor Dispute Resolution.

Links to Third-Party Sites and Social Media

[Click here](#) for more information

- P&G sites may include links to third party sites. P&G does not control these third party sites, and we encourage you to read the privacy policy of every site you visit.
- P&G sites may also have "plugins" (such as the Facebook "Like" button) to third-party sites or offer login (such as log in with Facebook) through a third-party account. Third-party plugins and login features, including their loading, operation and use, are governed by the privacy policy and terms of the third-party providing them.

How to Contact Us

- [Click here](#) (for country specific email and/or postal addresses).
- [Click here](#) to view answers to Frequently Asked Questions.



Privacy & Cookies

[Frequently Asked Questions](#) [Microsoft Services Agreement](#)

Last Updated: **July 2015**

[Expand All](#) [Print](#)

Microsoft Privacy Statement

Your privacy is important to us. This privacy statement explains what personal data we collect from you and how we use it. It applies to Bing, Cortana, MSN, Office, OneDrive, Outlook.com, Skype, Windows, Xbox and other Microsoft services that display this statement. References to Microsoft services in this statement include Microsoft websites, apps, software and devices.

We encourage you to read the summaries below and to click on "Learn More" if you'd like more information on a particular topic. The Service-Specific Details below provide additional information relevant to particular Microsoft services.

Personal Data We Collect

How We Use Personal Data

Reasons We Share Personal Data

Access & Control Your Personal Data

Cookies & Similar Technologies

Microsoft account

Other Important Privacy Information

Personal Data We Collect

Microsoft collects data to operate effectively and provide you the best experiences with our services. You provide some of this data directly, such as when you create a Microsoft account, submit a search query to Bing, speak a voice command to Cortana, upload a document to OneDrive, or contact us for support. We get some of it by recording how you interact with our services by, for example, using technologies like [cookies](#), and receiving error reports or usage data from software running on your device. We also obtain data from third parties (including other companies).

[Learn More](#)

How We Use Personal Data

Microsoft uses the data we collect to provide you the services we offer, which includes using data to improve and personalize your experiences. We also may use the data to communicate with you, for example, informing you about your account, security updates and product information. And we use data to help make the ads we

Privacy Policy

Information we collect

How we use information we collect

Transparency and choice

Information you share

Accessing and updating your personal information

Information we share

Information security

When this Privacy Policy applies

Compliance and cooperation with regulatory authorities

Changes

Specific product practices

Other useful privacy and security related materials

Self Regulatory Frameworks

Welcome to the Google Privacy Policy

When you use Google services, you trust us with your information. This Privacy Policy is meant to help you understand what data we collect, why we collect it, and what we do with it. This is important; we hope you will take time to read it carefully. And remember, you can find controls to manage your information and protect your privacy and security at [My Account](#).



Privacy Policy

Last modified: August 19, 2015 ([view archived versions](#))

[Hide examples](#)

 [Download PDF version](#)

There are many different ways you can use our services – to search for and share information, to communicate with other people or to create new content. When you share information with us, for example by creating a [Google Account](#), we can make those services even better – to show you more relevant search results and ads, to help you connect with people or to make sharing with others quicker and easier. As you use our services, we want you to be clear how we're using information and the ways in which you can protect your privacy.

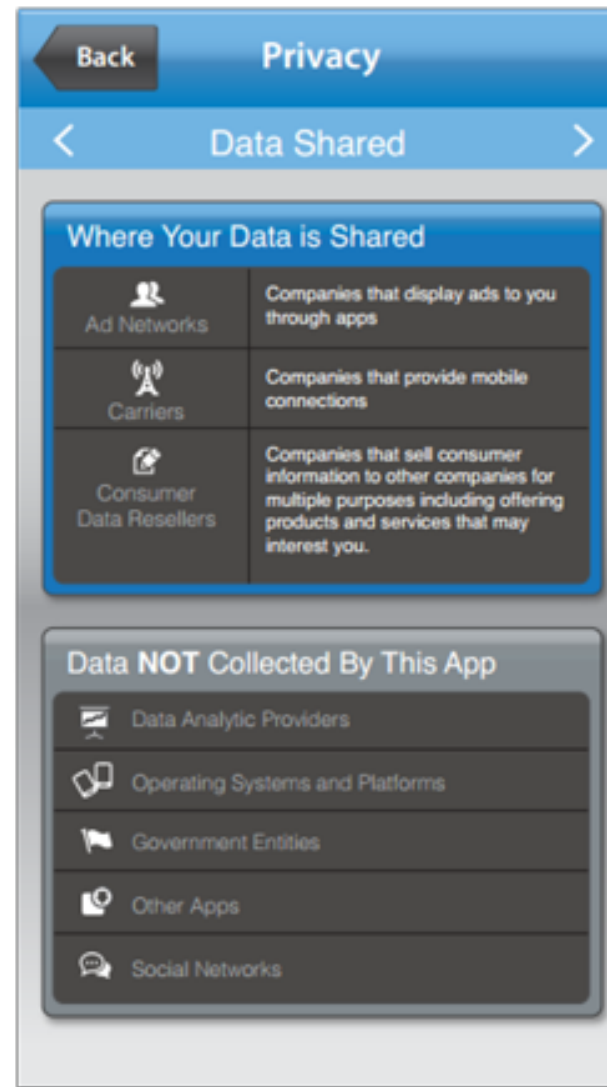
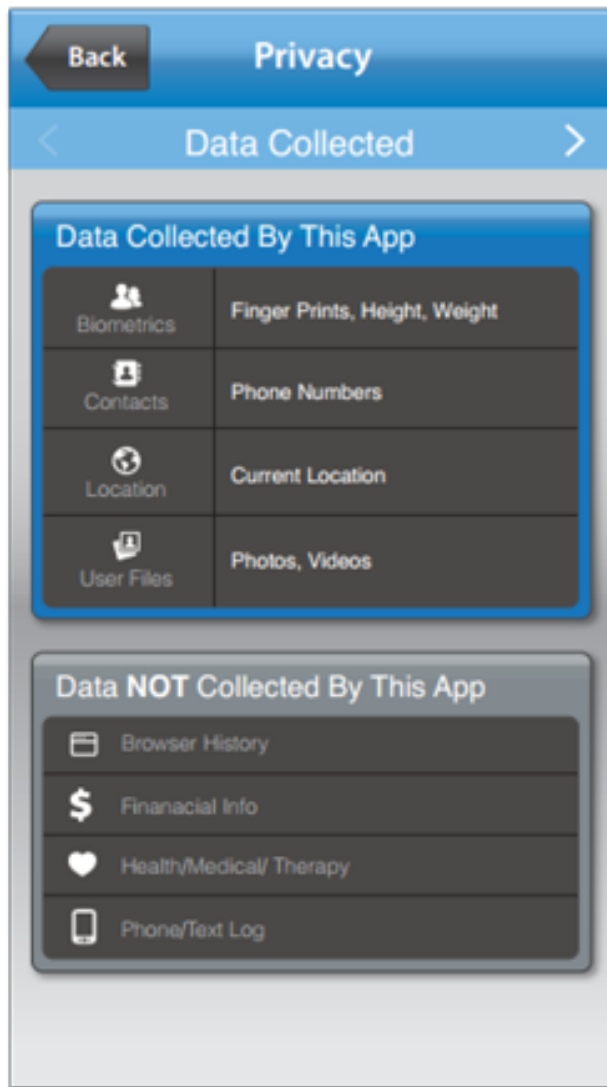
Our Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.

Example shorter notice

- [Gramm-Leach-Bliley Act](#)

NTIA mobile app transparency



About the IAPP

Contact us

Mission and background

Media inquiries

Corporate members

Board of directors

Advisory boards

Annual awards

Staff

IAPP careers

Governance

Privacy Statement

Updated: July 17, 2014

At the International Association of Privacy Professionals, we know you care about your personal privacy and about the terms and conditions that govern your use of this Web site (this "Site"). Because we are dedicated to serving your needs and respecting your preferences, we have adopted the policies and practices described in this Privacy Statement and Conditions of Use.

Our Collection and Use of Your Personally Identifiable Information

In general, we collect and use information about you for membership administration, to deliver member benefits (e.g., our newsletter) and to inform you of IAPP-related conferences, benefits and/or other opportunities. Except as described herein, we do not sell, rent or otherwise share or disclose your private, personally identifiable information to third parties.



Carnegie Mellon University
CyLab

isr institute for
SOFTWARE
RESEARCH

**Engineering &
Public Policy**

Industry privacy guidelines

- Direct Marketing Association Privacy Promise
<http://www.dmaconsumers.org/privacy.html>
- Network Advertising Initiative Principles
<http://www.networkadvertising.org/>
- DAA Self-Regulatory Principles
<http://www.aboutads.info/principles>
- CTIA Location-based privacy guidelines
http://www.ctia.org/business_resources/wic/index.cfm/AID/11300
- GSMA Mobile Privacy Principles
<http://www.gsma.com/publicpolicy/mobile-and-privacy/mobile-privacy-principles>

Privacy Notice Highlights Template

Template prepared
by the Notices
Project, a program
of the Center for
Information Policy
Leadership at
Hunton & Williams

© 2002 Center for
Information Policy
Leadership

Dated: May 28, 2002

Acme Company Privacy Notice

SCOPE

This statement applies to Acme Company and several members of the Acme family of companies.

PERSONAL INFORMATION

We collect information directly from you and maintain information on your activity with us, including your visits to our website.

We obtain information, such as your credit report and demographic and lifestyle information, from other information providers.

USES

We use information about you to manage your account and offer you other products and services we think may interest you.

We share information about you with our sister companies to offer you products and services.

We share information about you with other companies, like insurance companies, to offer you a wider array of jointly-offered products and services.

We share information about you with other companies so they can offer you their products and services.

YOUR CHOICES

You may opt out of receiving promotional information from us and our sharing your contact information with other companies. To exercise your choices, call (800) 123-1234 or click on "choice" at ACME.com.

IMPORTANT INFORMATION

You may request information on your billing and payment activities.

HOW TO REACH US

For more information about our privacy policy, write to:

Consumer Department

Acme Company

11 Main Street

Anywhere, NY 10100

Or go to the privacy statement on our website at acme.com.



Search

[Home](#) | [Products](#) | [Services & industry solutions](#) | [Support & downloads](#) | [My IBM](#)**Privacy**[Privacy details](#)[Cookies](#)**Related links**[• TRUSTe](#)

Privacy

IBM Privacy practices on the web**Scope**

This statement applies to IBM Web Sites Worldwide.

Personal information

In general, you can visit us on the internet without telling us who you are or giving us personal information. There are times when we may need information from you, for instance: to process an order, to correspond, to provide a subscription or in connection with a job application. We may supplement this information to complete a transaction or to provide a better service.

Uses

- To fulfill your requests by us or by others involved in fulfillment.
- To contact you for customer satisfaction surveys, market research or in connection with certain transactions.
- By IBM and selected organizations for marketing purposes if you have permitted such use.
- In an non-identifiable format for analysis (e.g., Clickstream Data)
- To develop our business relationship if you represent an IBM Business Partner or Vendor

Your choices

- When we collect information from you, you may tell us that you do not want it used for further marketing contact and we will respect your wishes.
- You may also turn off cookies in your browser.

Important information

IBM is a member of TRUSTe (www.truste.org). IBM abides by the EU/US Safe Harbor Framework. To correct inaccuracies in IBM's record of your personal information respond to the sender or contact IBM at access_request@us.ibm.com

For IBM's complete notice see [IBM's Privacy policy](#).

How to contact us

Questions about this statement or about IBM's handling of your information may be sent to:

prvcy@us.ibm.com, or

Privacy, IBM
1133 Westchester Ave.
White Plains, NY 10604
USA

Checkbox proposal

WE SHARE [DO NOT SHARE] PERSONAL INFORMATION WITH OTHER WEBSITES OR COMPANIES.

Collection:

YES

NO

- | | | |
|---|-------------------------------------|-------------------------------------|
| We collect personal information directly from you | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| We collect information about you from other sources: | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| We use cookies on our website | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| We use web bugs or other invisible collection methods | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| We install monitoring programs on your computer | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Uses: We use information about you to:

With Your

Without Your

Consent

Consent

- | | | |
|---------------------------|-------------------------------------|-------------------------------------|
| Send you advertising mail | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Send you electronic mail | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Call you on the telephone | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Sharing: We allow others to use your information to:

With Your

Without Your

Consent

Consent

- | | | |
|-------------------------------------|-------------------------------------|-------------------------------------|
| Maintain shared databases about you | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Send you advertising mail | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Send you electronic mail | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Call you on the telephone | N/A | N/A |

Access: You can see and correct {ALL, SOME, NONE} of the information we have about you.

Choices: You can opt-out of receiving from

Us

Affiliates

Third Parties

- | | | | |
|------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| Advertising mail | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Electronic mail | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Telemarketing | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | N/A |

Retention: We keep your personal data for: {**Six Months** **Three Years** **Forever**}

Change: We can change our data use policy {AT ANY TIME, WITH NOTICE TO YOU, ONLY FOR DATA COLLECTED IN THE FUTURE}

Source: Robert Gellman, July 3, 2003

IAPP

- International Association of Privacy Professionals
- <http://www.privacyassociation.org/>