

Privacy notice and choice

Lorrie Faith Cranor

September 29, 2015

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

Carnegie
Mellon
University

CyLab



Engineering &
Public Policy



Today you will learn

- How notice and choice has worked out in practice
- Ways to empirically test claims about the effectiveness of tools for consumers

But first... some notes on homework

- Optional reading summaries should be taken from optional reading assigned AFTER the last homework assignment was due, through the due date of the current assignment
- Highlights should show some insight or reflection on your part, not just a trivial observation

Summary and highlight example

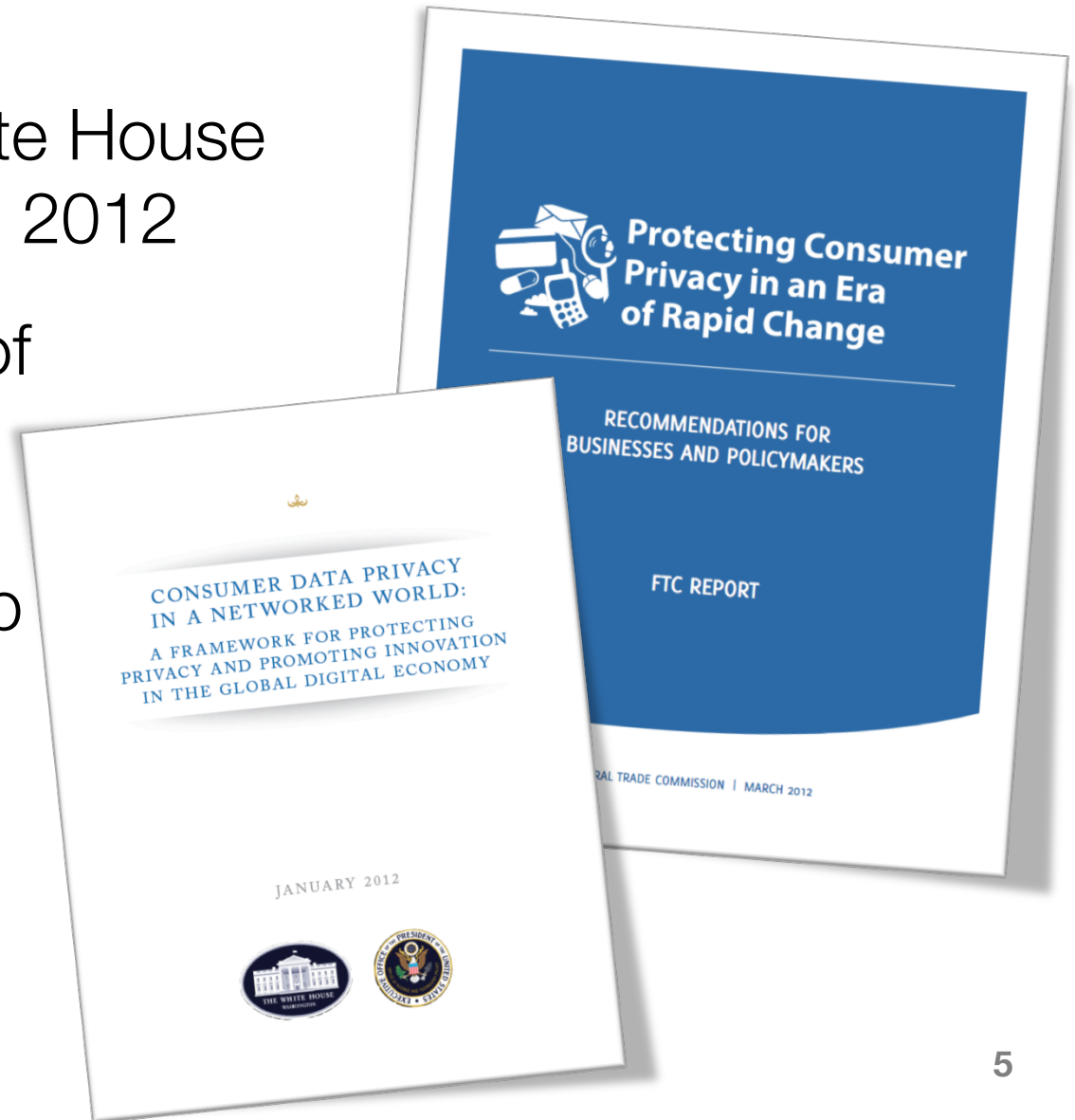
Question 1:

Brandimarte – Summary: The experiments described in this paper tested personal privacy attitudes in relation to the amount of control over the personal information being revealed. By varying control over information release in three separate studies, the experiments revealed a paradoxical effect such that increased control over the release of information increased willingness to share sensitive information, independent of how accessible the information is to others. This result raises the concern that technologies that give users greater control over the release of their information may actually expose them to greater risk if they lead to users being more willing to disclose information [1].

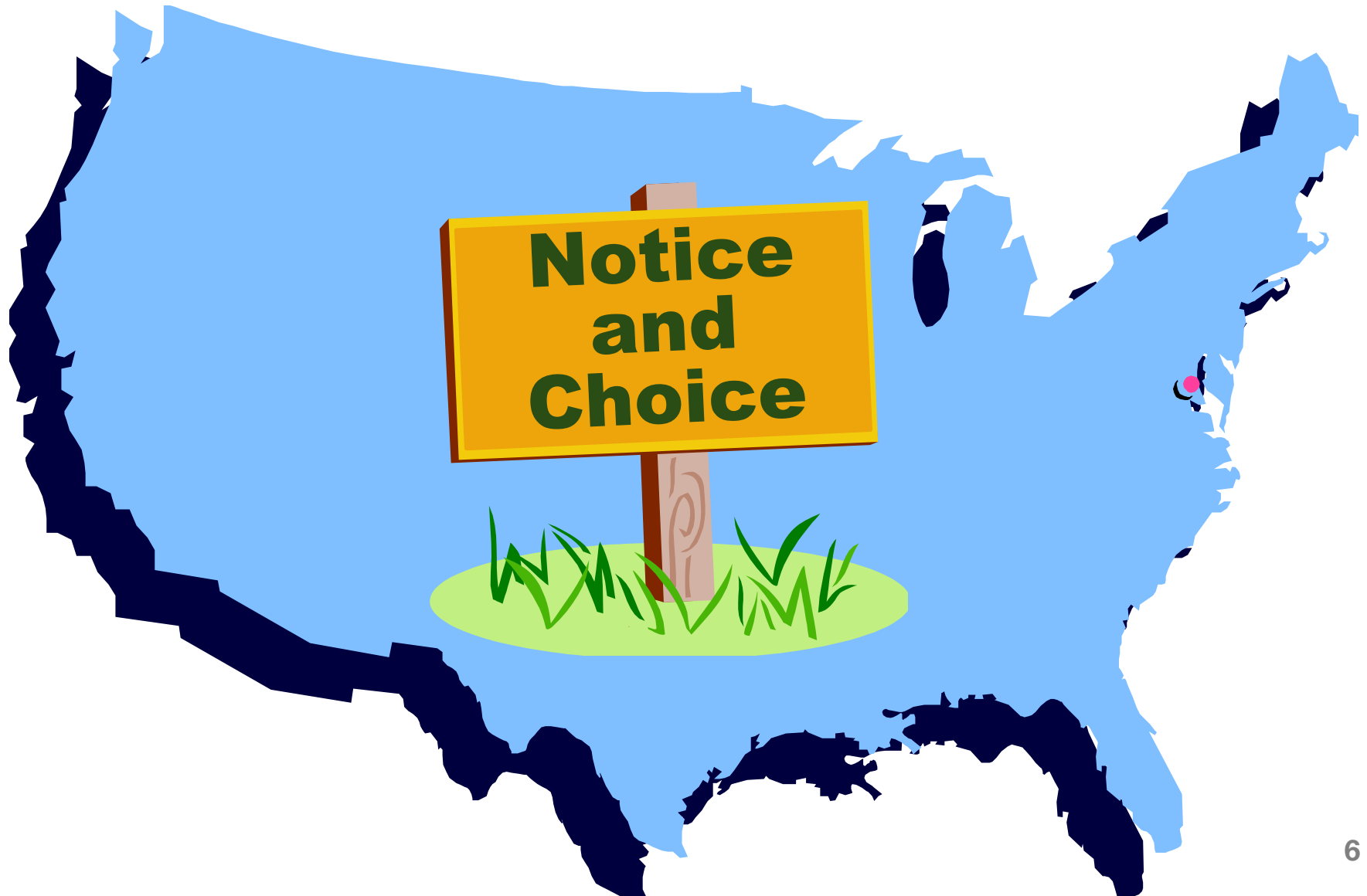
Brandimarte – Highlight: It is very interesting to me that perceived control over the dissemination of personal information has a greater effect on people's willingness to disclose information than the objective risk of the disclosure. Though all three experiments supported this conclusion, I think it was best reflected in Study 1, where students who were told their profiles would definitely be published online answered intrusive questions at a greater rate than students who were told that 50% of the profiles would be published at random. Even though the first set of students had a 100% chance of disclosure and the second set 50%, the perceived lack of control in the publication of the information seems to have had an influence on the privacy attitudes of those students [1].

US government privacy reports

- U.S. FTC and White House reports released in 2012
- U.S. Department of Commerce multi-stakeholder process to develop enforceable codes of conduct



Privacy self regulation



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

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

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.](#)

TRADER JOE'S®
SHREDDED
BITE SIZE
WHEATS

Nutrition Facts
 Serving Size 1 cup (49 g)
 Servings Per Container about 10

Amount Per Serving	% Daily Value*
Calories 180	Calories from Fat 10
Total Fat 1g	
Saturated Fat 0g	0%
Trans Fat 0g	0%
Cholesterol 0mg	0%
Sodium 0mg	0%
Potassium 180mg	5%
Total Carbohydrate 36g	13%
Dietary Fiber 5g	20%
Sugars 0g	
Protein 5g	

Vitamin A 0% • Vitamin C 0%
 Calcium 0% • Iron 8%
 Thiamine 8% • Riboflavin 2%
 Niacin 10% • Vitamin D 0%

INGREDIENTS: Whole Wheat, Vitamin E (to preserve freshness).

Dist. & Sold Exclusively By
 Trader Joe's,
 Monrovia, CA 91016



This product is sold by weight not volume. Some settling of contents may have occurred during handling and shipping.

BARBARA'S BAKERY
Shredded Spoonfuls®
Multigrain

Nutrition Facts
 Serving Size 3/4 Cup (32g)
 Servings Per Container About 21

Amount Per Serving	Calories	Total Fat	Saturated Fat	Trans Fat	Cholesterol	Sodium	Potassium	Total Carbohydrate	Dietary Fiber	Sugars	Protein
120	180	15	1	0	0	0	0	24	8	15	4

Vitamin A 0% • Vitamin C 0%
 Calcium 0% • Iron 8%
 Thiamine 8% • Riboflavin 2%
 Niacin 10% • Vitamin D 0%

TRADER JOE'S®
Very Berry Clusters CEREAL

Nutrition Facts
 Serving Size 1 cup (55 g)
 Servings Per Container about 7

Amount Per Serving	Calories	Total Fat	Saturated Fat	Trans Fat	Cholesterol	Sodium	Potassium	Total Carbohydrate	Dietary Fiber	Sugars	Protein
230	230	5	0	0	0	0	0	42	14	11	5

Vitamin A 0% • Vitamin C 2%
 Calcium 2% • Iron 6%

Nutrition Facts
 Serving Size 1/4 cup (30g)
 Servings Per Container about 12

Amount Per Serving	Multi Grains	1g Top	1g Top
110	150	5	10

Total Fat 0.5g 1% 1%
Saturated Fat 0g 0% 0%
Trans Fat 0g
Cholesterol 0mg 0% 1%
Sodium 125mg 5% 8%
Potassium 10mg 2% 8%
Total Carbohydrate 25g 8% 10%
Dietary Fiber 2g 8% 8%
Sugars 4g
Other Carbohydrate 19g
Protein 1g

Vitamin A 0% 4%
 Vitamin C 0% 0%
 Calcium 0% 15%
 Iron 25% 25%
 Vitamin D 0% 15%
 Thiamin 25% 30%
 Niacin 25% 25%
 Vitamin B6 25% 25%
 Folic Acid 25% 25%
 Phosphorus 8% 20%
 Magnesium 6% 10%
 Zinc 25% 30%

Shredded Oats™
Original

Nutrition Facts
 Serving Size 1-1/4 Cup (55g)
 Servings Per Container About 12

Amount Per Serving	Calories	Total Fat	Saturated Fat	Trans Fat	Cholesterol	Sodium	Potassium	Total Carbohydrate	Dietary Fiber	Soluble Fiber	Insoluble Fiber	Sugars	Protein
220	260	25	2	0	0	0	0	42	14	16	16	11	6

Vitamin A 0% 6%
 Vitamin C 35% 35%
 Calcium 2% 15%
 Iron 10% 10%
 Vitamin E 8% 8%
 Thiamin 10% 15%
 Riboflavin 4% 10%
 Niacin 6% 6%
 Phosphorus 15% 30%
 Magnesium 15% 20%
 Zinc 10% 15%
 Copper 10% 10%

TRADER JOE'S®
Organic HIGH FIBER O's

Nutrition Facts
 Serving Size 1 1/4 cup (55g)
 Servings per Container 8

Amount per Serving	Calories	Total Fat	Saturated Fat	Trans Fat	Cholesterol	Sodium	Potassium	Total Carbohydrate	Dietary Fiber	Soluble Fiber	Insoluble Fiber	Sugars	Protein
190	190	1	0	0	0	0	0	44	15	36	12	9	6

Vitamin A 0% • Vitamin C 130%
 Calcium 4% • Iron 30%
 Thiamin 25% • Riboflavin 25%
 Niacin 25% • Vitamin B6 25%
 Folate 25% • Vitamin B12 25%
 Zinc 15%

TRADER JOE'S®
Organic Corn Flakes

Nutrition Facts
 Serving Size 1 Cup (30g)
 Servings Per Container about 11

Amount Per Serving	Calories	Total Fat	Saturated Fat	Trans Fat	Cholesterol	Sodium	Potassium	Total Carbohydrate	Dietary Fiber	Sugars	Protein
110	110	0	0	0	0	0	0	26	3	3	2

Vitamin A 25% • Vitamin C 25%
 Calcium 0% • Iron 45%
 Vitamin D 25% • Thiamin 25%
 Riboflavin 25% • Niacin 25%
 Vitamin B6 25% • Folic Acid 50%
 Vitamin B12 25% • Zinc 25%

INGREDIENTS: WHOLE GRAIN WHEAT*, RICE*, CORN MEAL*, NATURALLY MILLED SUGAR*, SALT, MALT EXTRACT*, VITAMIN E (MIXED TOCOPHEROLS) ADDED TO PRESERVE FRESHNESS. *ORGANIC VITAMINS AND MINERALS: IRON AND ZINC MINERAL SUPPLEMENTS, A & VITAMIN B6 (THIAMIN MONONITRATE), VITAMIN B1 (PYRIDOXINE HYDROCHLORIDE), VITAMIN B2 (RIBOFLAVIN), VITAMIN B12 (CYANOCOBALAMIN). MAY CONTAIN ALMOND, SOY AND MILK INGREDIENTS.

DISTRIBUTED BY SMALL PLANET FOODS, INC. SEBRO-WOODLEY, WA 98054 USA
 PRODUCT OF CANADA

© 2008 Small Planet Foods, Inc.
CERTIFIED ORGANIC

This product is certified organic by the Washington State Department of Agriculture in accordance with the organic standards in the U.S. Department of Agriculture.

INGREDIENTS: Organic Whole Grain Wheat Flour, Organic Whole Bran, Organic Enriched Case Juice, Organic Gelatin, Soy Salt, Organic Soy Lecithin (AN EMULSIFIER), MIXED TOCOPHEROLS (VITAMIN E) ADDED TO PRESERVE FRESHNESS. VITAMINS & MINERALS: FERRIC ORTHOPHOSPHATE (IRON SOURCE), SODIUM ASCORBATE (VITAMIN C), VITAMIN A ACETATE, NIACINAMIDE (A B VITAMIN), ZINC OXIDE (ZINC SOURCE), FOLIC ACID (A B VITAMIN), CYANOCOBALAMIN (VITAMIN B12), CHOLECALCIFEROL (VITAMIN D), PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), RIBOFLAVIN (VITAMIN B2), THIAMIN MONONITRATE (VITAMIN B1).

Our vendors follow Good Manufacturing Practices to segregate ingredients to avoid cross contact with allergens. Made on shared equipment with milk, soy, nuts & soy. Facility processes eggs & peanuts.

Dist. & Sold Exclusively By
 Trader Joe's, Monrovia, CA 91016
 Certified Organic by
 Quality Assurance International (QAI)

INGREDIENTS: Organic Milled Corn, Organic Enriched Case Juice, Organic Enriched Case Juice, Organic Gelatin, Soy Salt, Organic Soy Lecithin (AN EMULSIFIER), MIXED TOCOPHEROLS (VITAMIN E) ADDED TO PRESERVE FRESHNESS. VITAMINS & MINERALS: FERRIC ORTHOPHOSPHATE (IRON SOURCE), SODIUM ASCORBATE (VITAMIN C), VITAMIN A ACETATE, NIACINAMIDE (A B VITAMIN), ZINC OXIDE (ZINC SOURCE), FOLIC ACID (A B VITAMIN), CYANOCOBALAMIN (VITAMIN B12), CHOLECALCIFEROL (VITAMIN D), PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), RIBOFLAVIN (VITAMIN B2), THIAMIN MONONITRATE (VITAMIN B1).

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Privacy Facts

[Redacted text block]

Privacy Facts

[Redacted text block]

Privacy Facts

[Redacted text block]

Privacy Facts

[Redacted text block]

“In theory there is no
difference between theory and
practice. In practice there is.”

—Yogi Berra

How effective is privacy
notice and choice **in practice**?



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Transparency

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HOW TO FILE
A privacy complaint

SECURING PERSONAL INFORMATION

News

Global Privacy Enforcement Network Internet Privacy Sweep Questions and Answers

May 6, 2013

What will happen during the Internet Privacy Sweep? What is the goal?

Privacy enforcement authorities participating in the Sweep will designate individuals within their organizations to search the Internet in a coordinated effort to assess privacy practices related to a predetermined theme – this year the theme is Privacy Practice Transparency.

The Sweep will provide flexibility for privacy enforcement authorities to tailor their search within this common theme to focus on issues that are relevant in the context of domestic legislation, market factors and strategic priorities.

The purpose of the Sweep is *not* to conduct an in-depth analysis of the privacy practice transparency of each website, but to replicate the consumer experience by spending a few minutes per site checking for performance against set common indicators.

The Sweep is not an investigation, nor is it intended to conclusively identify

News

Year:

Speeches

Year:

UPCOMING EVENTS

Media Relations

Contact:
[Anne-Marie Hayden](#)

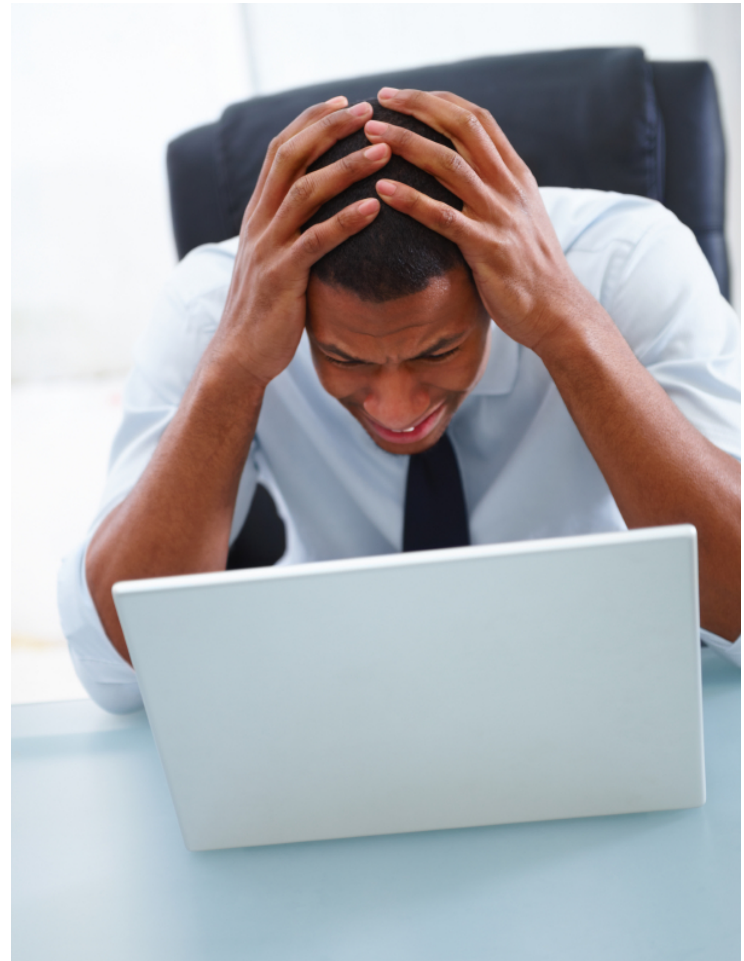
Non-journalists are invited to contact our Information Centre. Please call 1-800-282-1376 (toll free) or (613) 947-1698 and ask to speak with an Information Officer.

Address:
112 Kent Street
Ottawa, ON
K1A 1H3
Fax: (613) 995-1139

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”

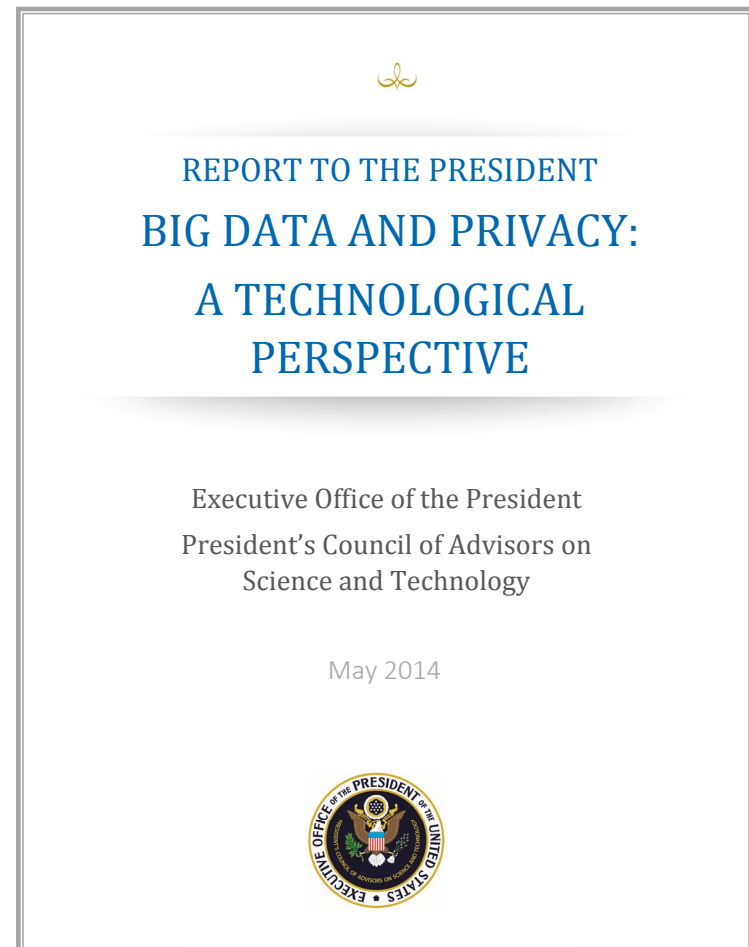
- *Protecting Consumer Privacy in an Era of Rapid Change. Preliminary FTC Staff Report. December 2010.*



Nobody actually reads policies

“Only in some fantasy world do users actually read these notices and understand their implications before clicking to indicate their consent.”

- *Big Data and Privacy: A Technological Perspective.* PCAST 2014.



Cost of reading privacy policies

- What would happen if everyone read the privacy policy for each site they visited once each month?
- Time = 244/hours year
- Cost = \$3,534/year
- National opportunity cost for time to read policies: \$781 billion



A. McDonald and L. Cranor. The Cost of Reading Privacy Policies. I/S: A Journal of Law and Policy for the Information Society. 2008 Privacy Year in Review Issue. <http://lorrie.cranor.org/pubs/readingPolicyCost-authorDraft.pdf>



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.



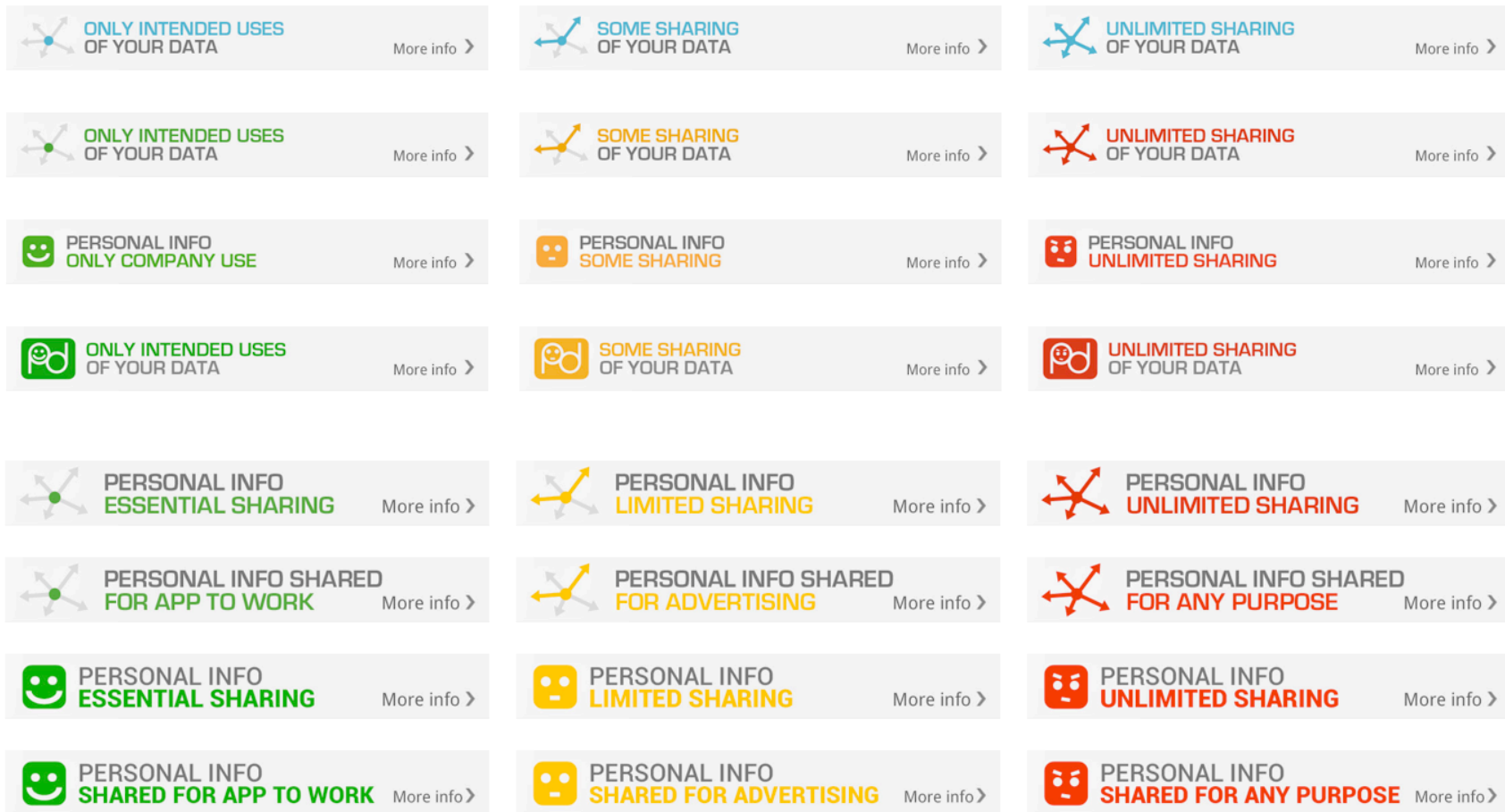
Data may be given to law enforcement even when legal process is not followed.



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

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

Apps

Word Weasel
concreterose Download

Next game starts in 33.3 seconds
Word Weasel
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

Apps

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

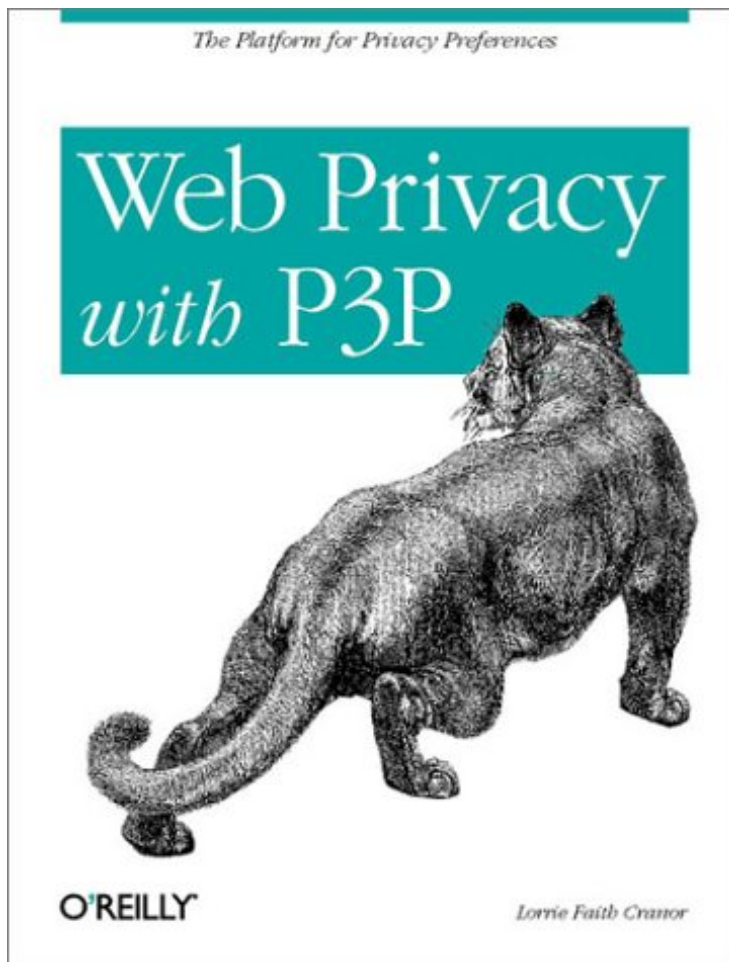
Average	5 stars	534
4.6	4 stars	210
★★★★☆	3 stars	37
793	2 stars	5
	1 star	7

Role play studies

- Task for participants in lab or online
 - Select apps for friend with new Android phone
 - Choose from 2 similar apps w/ different permission requests in each of 6 categories
 - Click on app name to visit download screens
- Post-task questionnaire
- Participants who saw Privacy Facts more likely to select apps that requested fewer permissions
 - Other factors such as brand and rating reduce effect

P.G. Kelley, L.F. Cranor, and N. Sadeh. Privacy as part of the app decision-making process. CHI 2013.

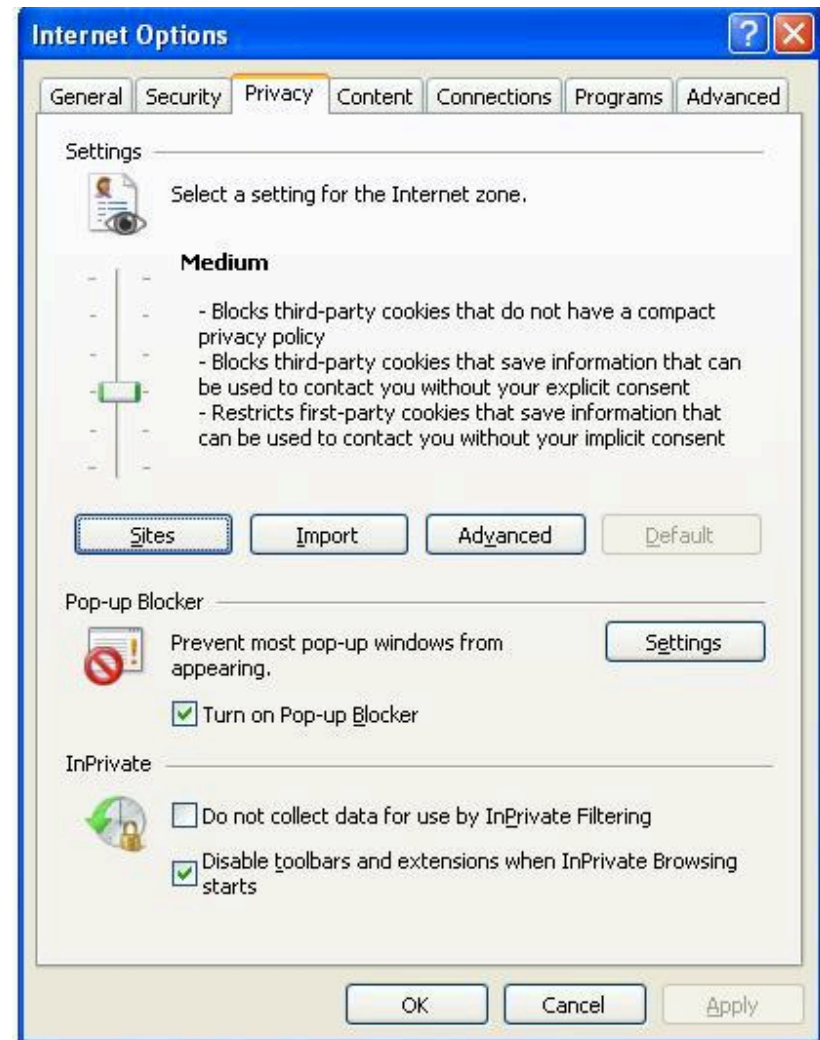
Let your computer read for you



- 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 Internet Explorer

- P3P implemented in IE 6, 7, 8, 9, 10 ...
- Default privacy setting
 - Rejects third-party cookies without a CP
 - Rejects unsatisfactory third-party cookies




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

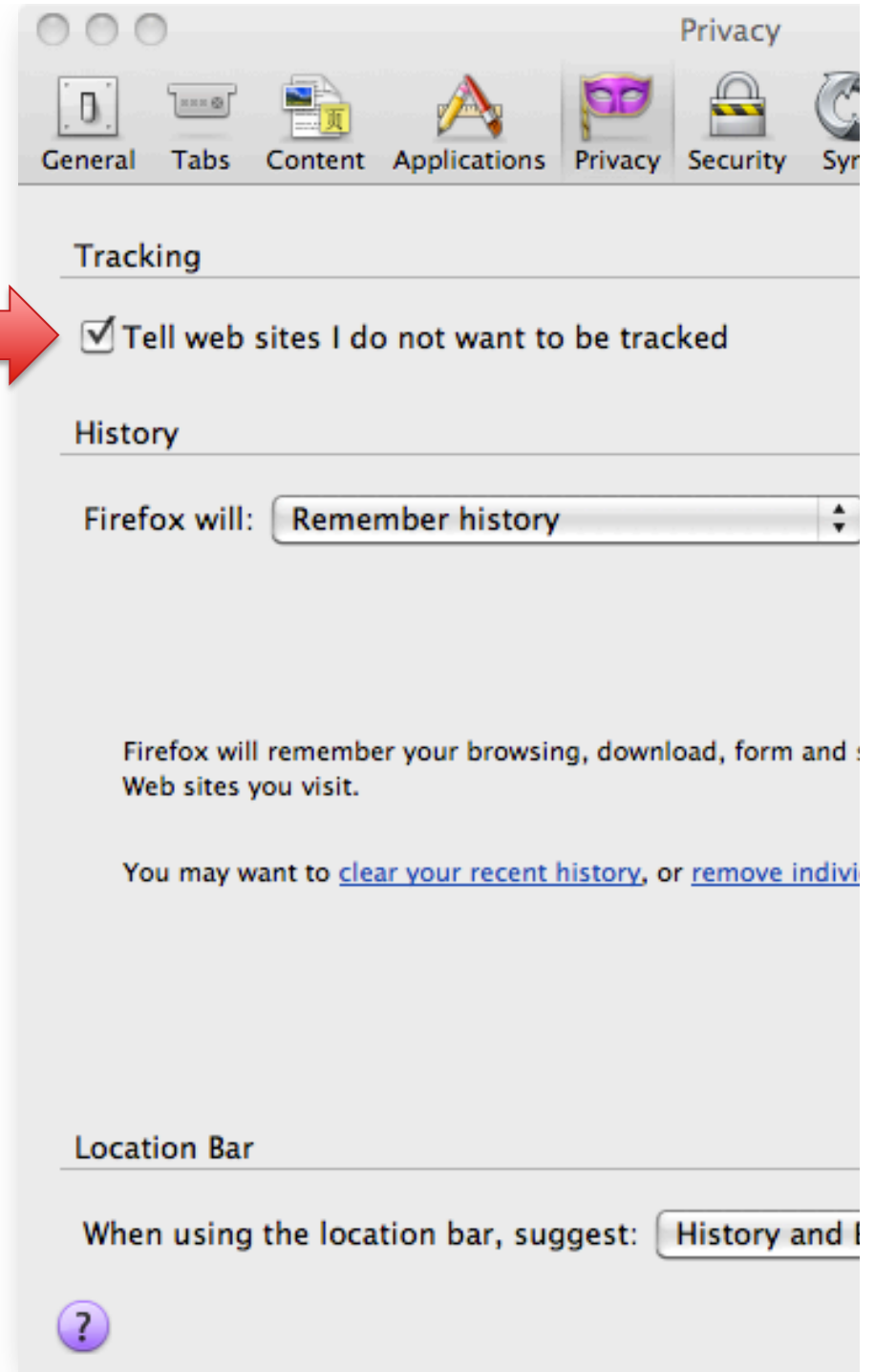
Languages

[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.

Do not track

- Proposed W3C standard
- User checks a box
- Browser sends “do not track” header to website
- Website stops “tracking”
- W3C working group trying to define what that means



Lots of tools to stop tracking

- Browser privacy settings
 - Cookie blocking
 - P3P
 - Tracking Protection Lists
 - Do Not Track
- Browser add-ons
- Opt-out cookies
- Digital Advertising Alliance (DAA) AdChoices icon and associated opt-out pages



DoNotTrackMe



Are any of these tools effective?

- Do the tools work?
 - Does technology do what it is supposed to do?
 - Do companies respect user choices?
- Can consumers use them?
 - Do users understand tracking?
 - Do users understand what tools do?
 - Can users make tools do what they want?

Why Johnny Can't Opt Out: A Usability Evaluation of Tools to Limit Online Behavioral Advertising

Pedro G. Leon, Blase Ur, Rebecca
Balebako, Lorrie Faith Cranor,
Richard Shay, and Yang Wang
CHI 2012

Three types of tools tested

Blocking Tools



Opt-out Tools



Privacy built in browser



Methodology

- Part of previous interview study
- 45 participants evaluated 9 tools
 - Between subjects study
 - Random assignment, controlled for preferred web browser and operating system


Testing protocol

- Semi-structured interview
- Usability testing
 - Task 1: Learn about and install the tool
 - Task 2: Change tool settings
 - Task 3: Browsing scenarios
- Exit questionnaire

DAA website

THE SELF-REGULATORY PROGRAM FOR ONLINE BEHAVIORAL ADVERTISING

Home The Principles For Consumers For Companies List of Participants Resources News Enforcement Contact

 **Advertising Option Icon**

Welcome to the online home of the Self-Regulatory Program for Online Behavioral Advertising.

Building on the [Self-Regulatory Principles for Online Behavioral Advertising](#) (Principles) released in July 2009, the nation's largest media and marketing associations have come together to launch this Program, which gives consumers a better understanding of and greater control over ads that are customized based on their online behavior (also called "interest-based" advertising).

Our participating companies share a commitment to delivering consumers a robust and credible Program of notice and choice for online behavioral advertising, and to enhancing consumer confidence in the online medium.

For Consumers

Learn about Online Behavioral Advertising: If you're an online user, you can [find out more](#) about online behavioral advertising and how it helps provide you with more relevant advertising on the websites you visit. You'll learn how online advertising supports the free content, products and services you use online; what choices you have; and how to use browser controls to enhance your privacy.

Exercise Your Choice: You can now [visit](#) the beta version of the Program's Consumer Opt Out Page, which allows users to

Participating Associations

- A's LEADERSHIP COMMUNITY ADVOCACY GUIDANCE
- AAF
- ANA Leading the Marketing Community
- BBB Start With Trust
- DMA Direct Marketing Association
- iab.
- NAI

CONSUMER CHOICE PAGE

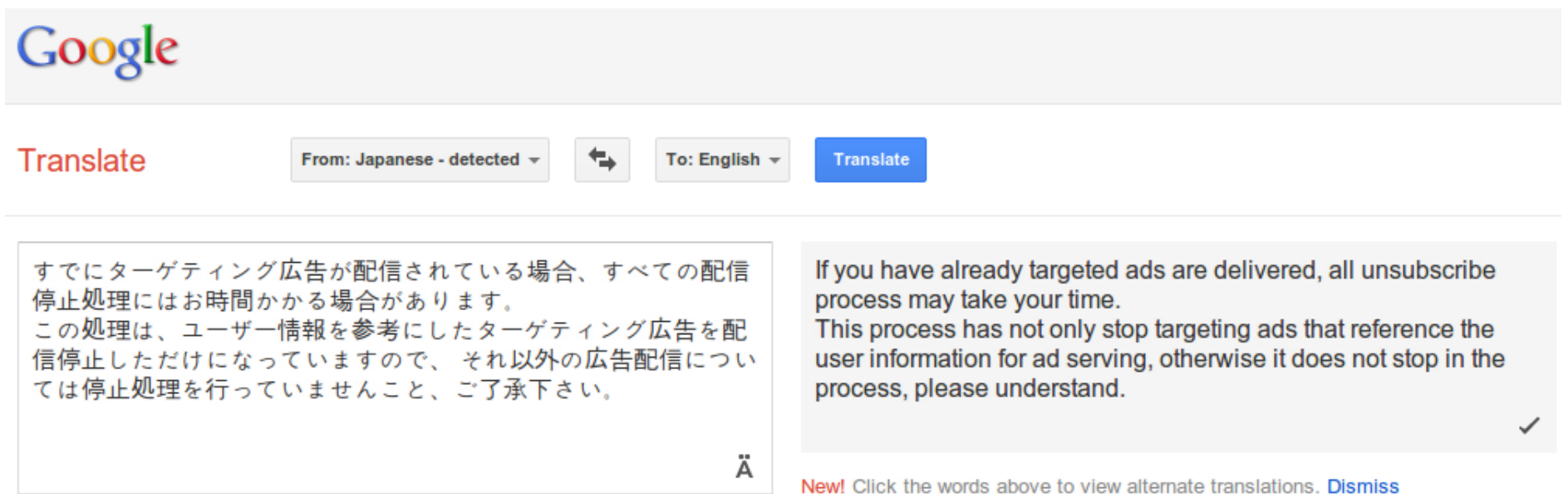
Make choices about interest-based ads from participating companies

[visit](#)

http://www.aboutads.info/home

5:03 PM 9/29/2011

Opting out can be challenging



The screenshot shows the Google Translate interface. At the top left is the Google logo. Below it, the word "Translate" is written in red. To the right of "Translate" are four buttons: "From: Japanese - detected" (with a dropdown arrow), a bidirectional arrow icon, "To: English" (with a dropdown arrow), and a blue "Translate" button. Below these buttons is a horizontal line. Under the line, there are two text boxes. The left box contains Japanese text: "すでにターゲティング広告が配信されている場合、すべての配信停止処理にはお時間かかる場合があります。この処理は、ユーザー情報を参考にしたターゲティング広告を配信停止しただけになっていますので、それ以外の広告配信については停止処理を行っていませんこと、ご了承下さい。" and a small "Ä" icon at the bottom right. The right box contains English text: "If you have already targeted ads are delivered, all unsubscribe process may take your time. This process has not only stop targeting ads that reference the user information for ad serving, otherwise it does not stop in the process, please understand." with a checkmark icon at the bottom right. Below the right box is a red "New!" label followed by the text "Click the words above to view alternate translations." and a blue "Dismiss" link.

Translate

From: Japanese - detected

To: English

Translate

すでにターゲティング広告が配信されている場合、すべての配信停止処理にはお時間かかる場合があります。この処理は、ユーザー情報を参考にしたターゲティング広告を配信停止しただけになっていますので、それ以外の広告配信については停止処理を行っていませんこと、ご了承下さい。

Ä

If you have already targeted ads are delivered, all unsubscribe process may take your time. This process has not only stop targeting ads that reference the user information for ad serving, otherwise it does not stop in the process, please understand.

New! Click the words above to view alternate translations. [Dismiss](#)

Ghostery configuration interface

The screenshot shows the Ghostery Options configuration interface in a browser window. The browser's address bar displays "ghostery/content/options.html". The interface is divided into two main sections: "Performance Options" and "Blocking Options".

Performance Options:

- Scan and block images served off the matched tracker domain
- Scan and block iframes served off the matched tracker domain
- Scan and block embed and object tags served off the matched tracker domain
- Look for and prevent redirection from known trackers
- Scan for dynamically inserted page elements

Blocking Options:

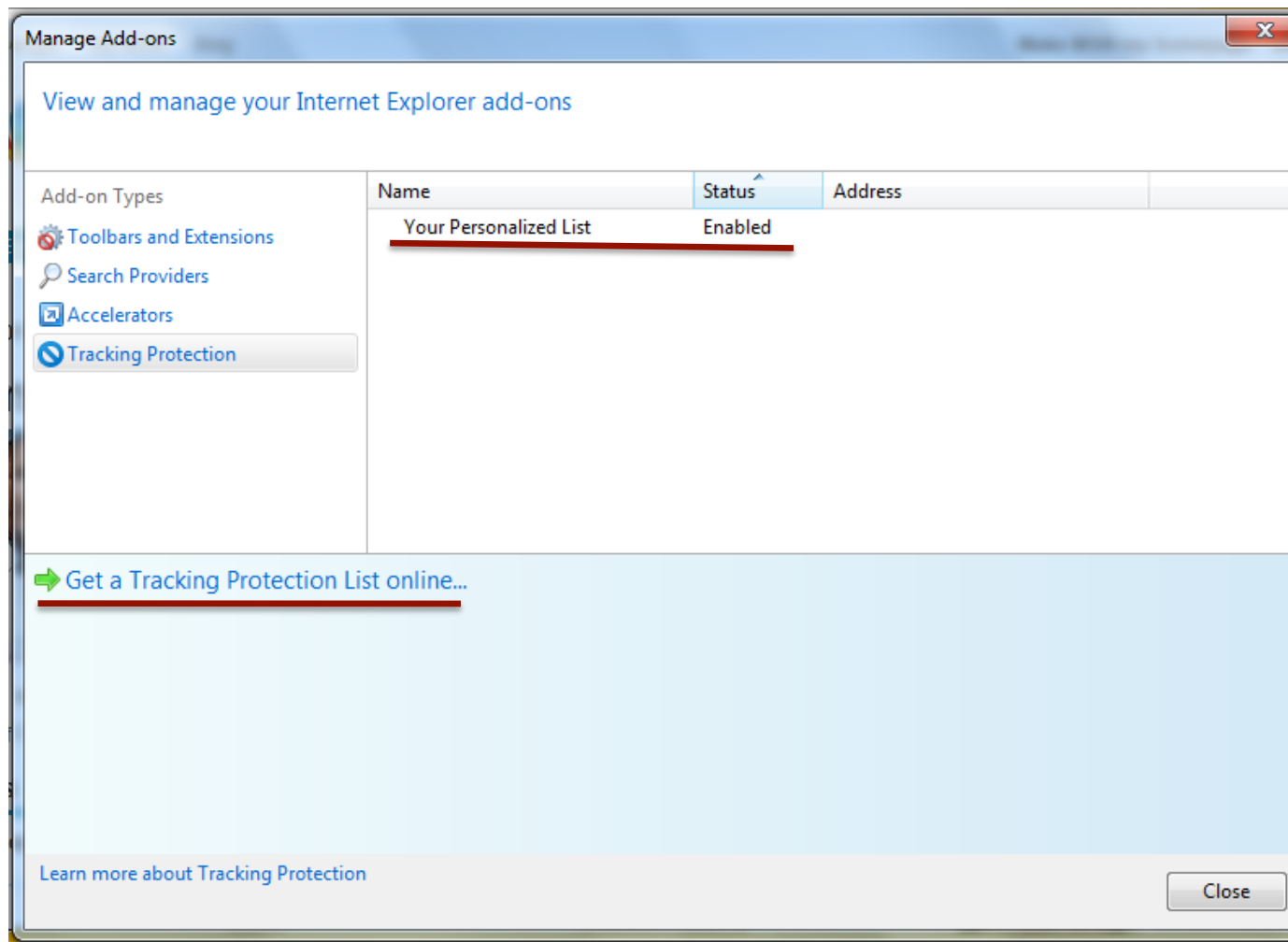
- Enable web bug blocking
- Enable cookie protection [experimental]

Below the Blocking Options, there is a summary and a list of blocked items:

659 bugs & 396 cookies (click for more info)

24/7 Real Media	iab. NAI	▶	🛡️	A+
2leep				
33Across	iab. NAI	▶		
3DStats				
5min Media	iab.			
[x+1]	NAI	▶		
Accelerator Media				
Aspen Media				

IE-TPL configuration interface



Takeaways

- Problematic defaults
- Poorly designed interfaces and jargon
- Feedback
- Misconceptions about opt-out tools
- Users unable to make meaningful decisions on a per-company basis

What Do Online Behavioral Advertising Disclosures Communicate to Users?

Pedro Giovanni Leon, Justin Cranshaw, Lorrie Faith Cranor, Jim Graves, Manoj Hastak, Blase Ur, and Guzi Xu. WPES 2012



AdChoices



Pop in. Stand out.

Buy Now!

TARGET P&G eStore amazon.com

AT&T.

The nation's largest 4G network.



LEARN MORE

Rethink Possible

4G speeds not available everywhere.

It's 1702, a decade after
The Crucible's infamous seductress
danced with the devil in Salem.

MAY 4-26, 2013

Abigail
1702

BY ROBERTO AGUIRRE-SACASA
DIRECTED BY TRACY BRIGDEN

CITY THEATRE

BUY TICKETS >

YAHOO!
--- ON THE ---
ROAD

Don't miss a beat

Ad Feedback

AdChoices

The industry claims total success

“The DAA has revolutionized consumer education and choice by delivering a real-time, in-ad notice more than 10 billion times every day through the increasingly ubiquitous DAA Advertising Option Icon (also known as the ‘Ad Choices’ Icon)”



Peter Kosmala, Former Managing Director of The Digital Advertising Alliance. Yes, *Johnny Can Benefit From Transparency and Control*. November 3, 2011.

Objectives

- Evaluate the effectiveness of different OBA disclosures at communicating notice and choice about OBA
- Find ways to improve effectiveness of OBA disclosures

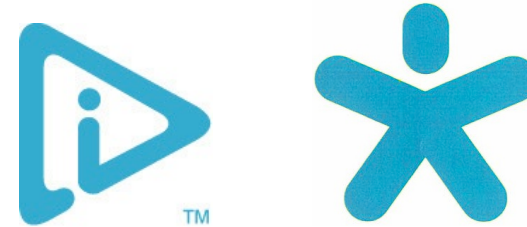
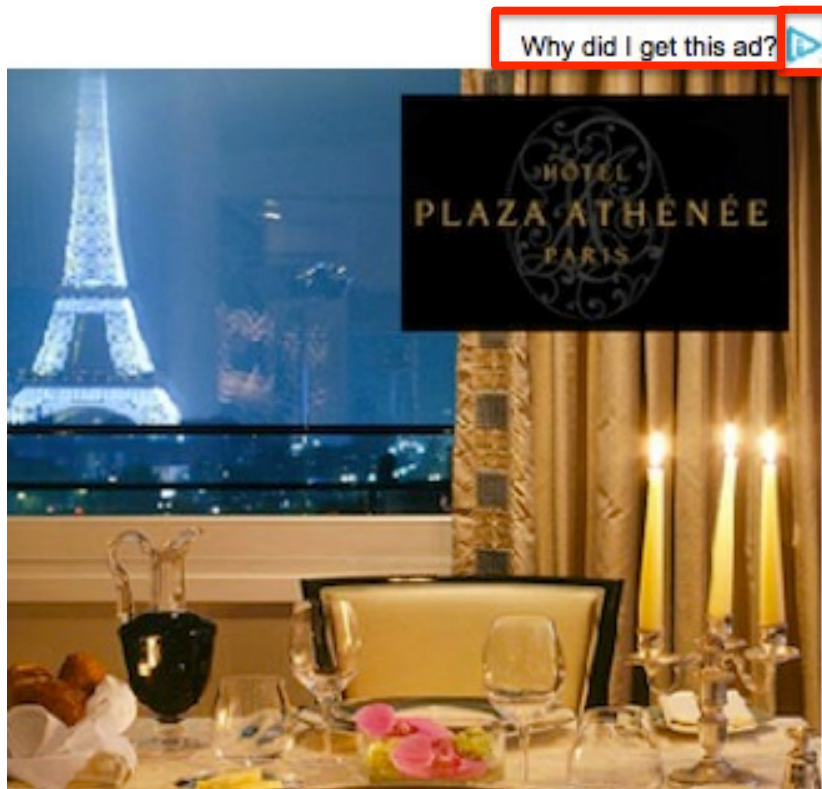
Methodology

- Large scale between-subjects online study
 - 1,505 participants
 - Over 100 participants per treatment
- Participants recruited through Amazon Mechanical Turk
- Guided browsing scenario
- Online survey

First exposure to OBA disclosures

The screenshot shows the front page of The New York Times website. At the top, navigation links include HOME PAGE, TODAY'S PAPER, VIDEO, MOST POPULAR, and TIMES TOPICS. On the right, there are links for Subscribe: Home Delivery / Digital, Log In, and Register Now. The main header features the newspaper's name, 'The New York Times', and the date, 'Tuesday, October 25, 2011', with a last update time of 11:21 PM ET. Two red boxes highlight 'Why did I get this ad?' links above Air France advertisements on the left and right sides of the page. The main content area is divided into several sections: a left sidebar with navigation links (Switch to Global Edition, JOBS, REAL ESTATE, AUTOS, ALL CLASSIFIEDS, WORLD, U.S., POLITICS, NEW YORK, BUSINESS, DEALBOOK, TECHNOLOGY, SPORTS, SCIENCE, HEALTH, OPINION, ARTS, Books, Movies, Music, Television, Theater, STYLE, Dining & Wine, Fashion & Style, Home & Garden, Weddings/); a central article titled 'Europe Faces New Hurdles in Crisis Over Debt' by Steven Erlanger and Rachel Donadio, dated 20 minutes ago; a photo of three metal chairs against a green wall with a payphone, captioned 'Dilip Vishwanat for The New York Times'; an article titled 'Baseball's Game of Telephone' by Pat Borzi, dated 3 minutes ago; and an article titled 'New Poll Finds a Deep Distrust of Government' by Jeff Zeleny and Megan Three-Brenan, dated 3 minutes ago. On the right, there is an 'OPINION' section with a link to 'Are Law Schools and Bar Exams Necessary?' by Clifford Winston, and a list of other opinion pieces including 'Brooks: The Fighter Fallacy', 'Nocera: Jobs's Biographer', 'Cohen: Defending the E.U.', 'Bruni: Have Glock', 'Editorial: Refinancing', and 'Room for Debate: Will Amazon Kill Off Publishers?'. A second red box highlights 'Why did I get this ad?' links above a Plaza Athénée advertisement in the bottom right corner, which shows a view of the Eiffel Tower at night from a restaurant window.

Second exposure to OBA disclosures



- Why did I get this ad?
- Interest based ads
- AdChoices
- Sponsor ads
- Learn about your ad choices
- Configure ad preferences
- 'No tagline'

Exposure to landing pages

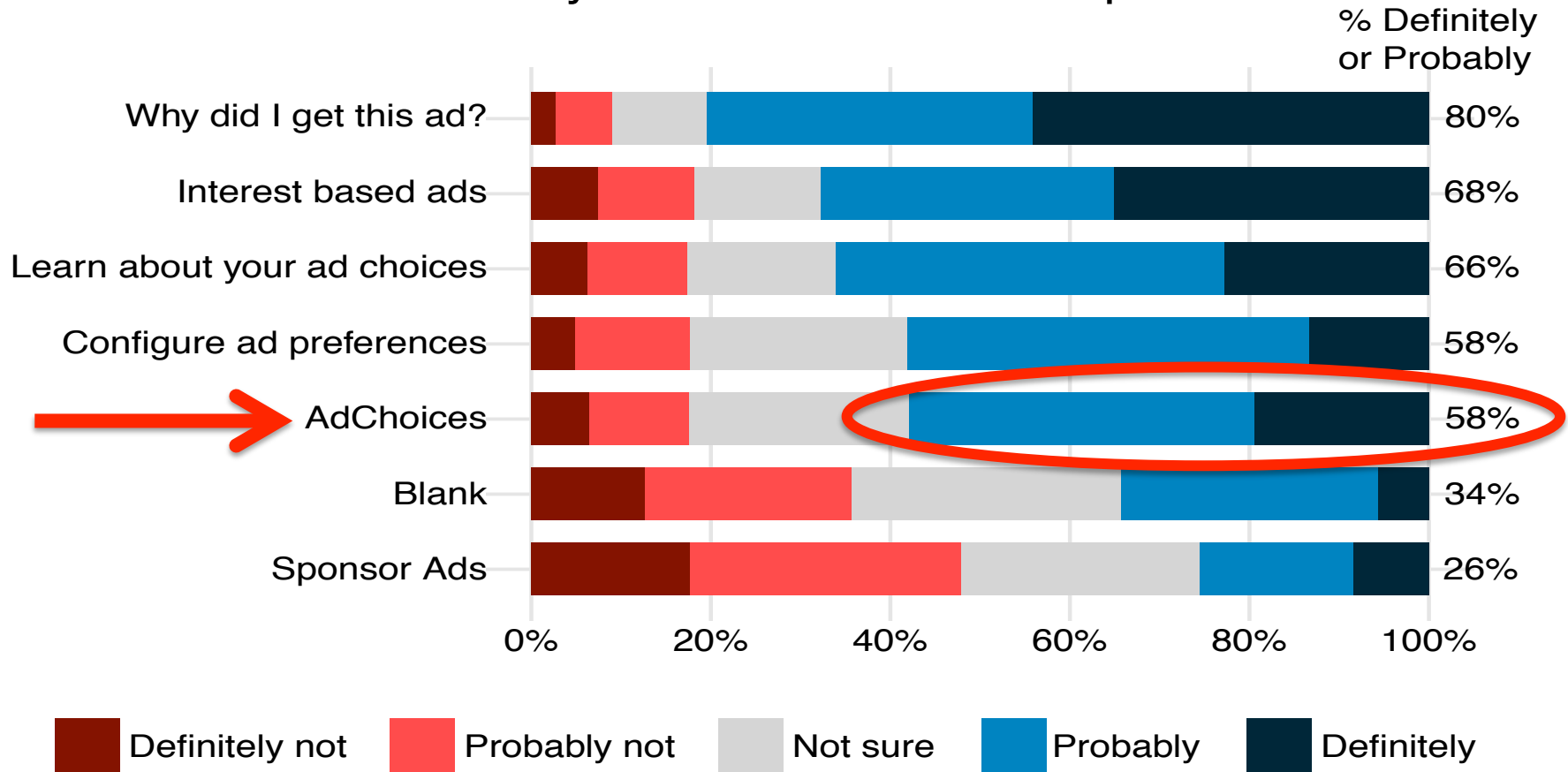


- AOL
- Yahoo!
- Microsoft
- Google
- Monster

Do icons and taglines suggest tailored ads?

- To what extent, if any, does this combination of the symbol and phrase, placed on the top right corner of the above ad suggest the following?
 - This ad has been tailored based on websites you have visited in the past. [true]

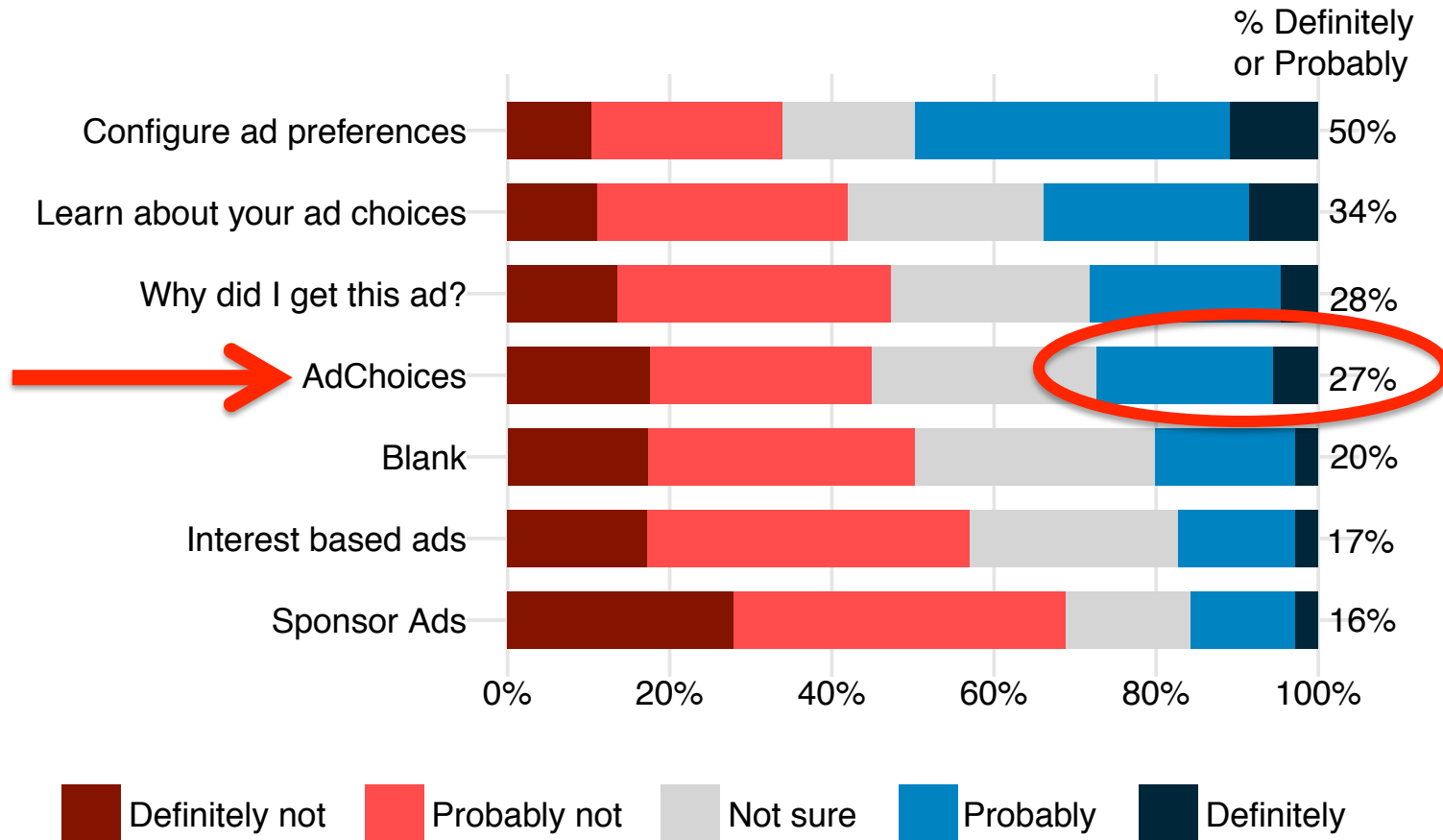
This ad has been tailored based on websites you have visited in the past



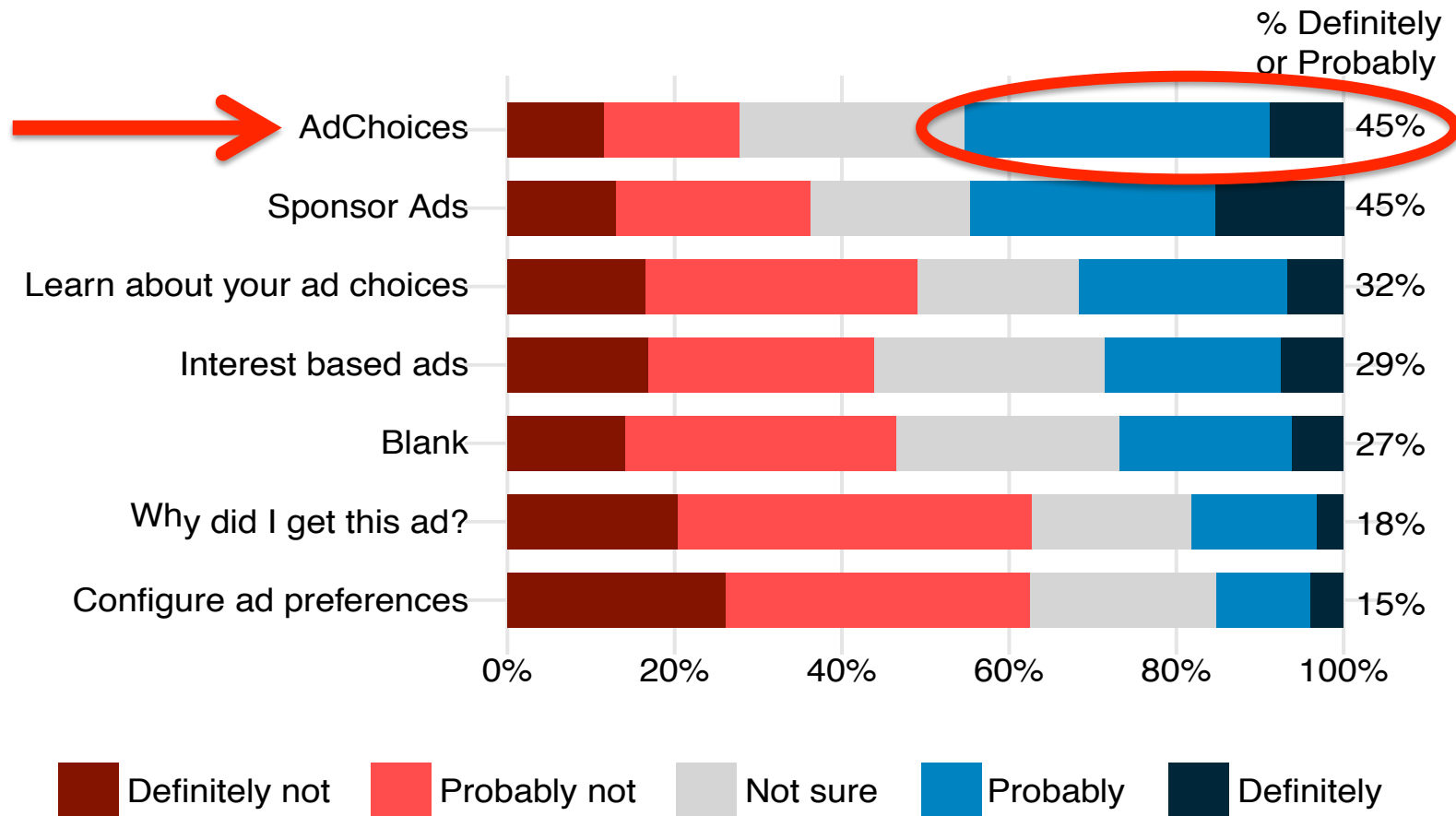
Willingness to click

- What do you think would happen if you click on that symbol or that phrase?
 - It will take you to a page where you can tell the advertising company that you do not want to receive tailored ads. [true]
 - More ads will pop up. [false]
 - It will take you to a page where you can buy advertisements on this website. [false]

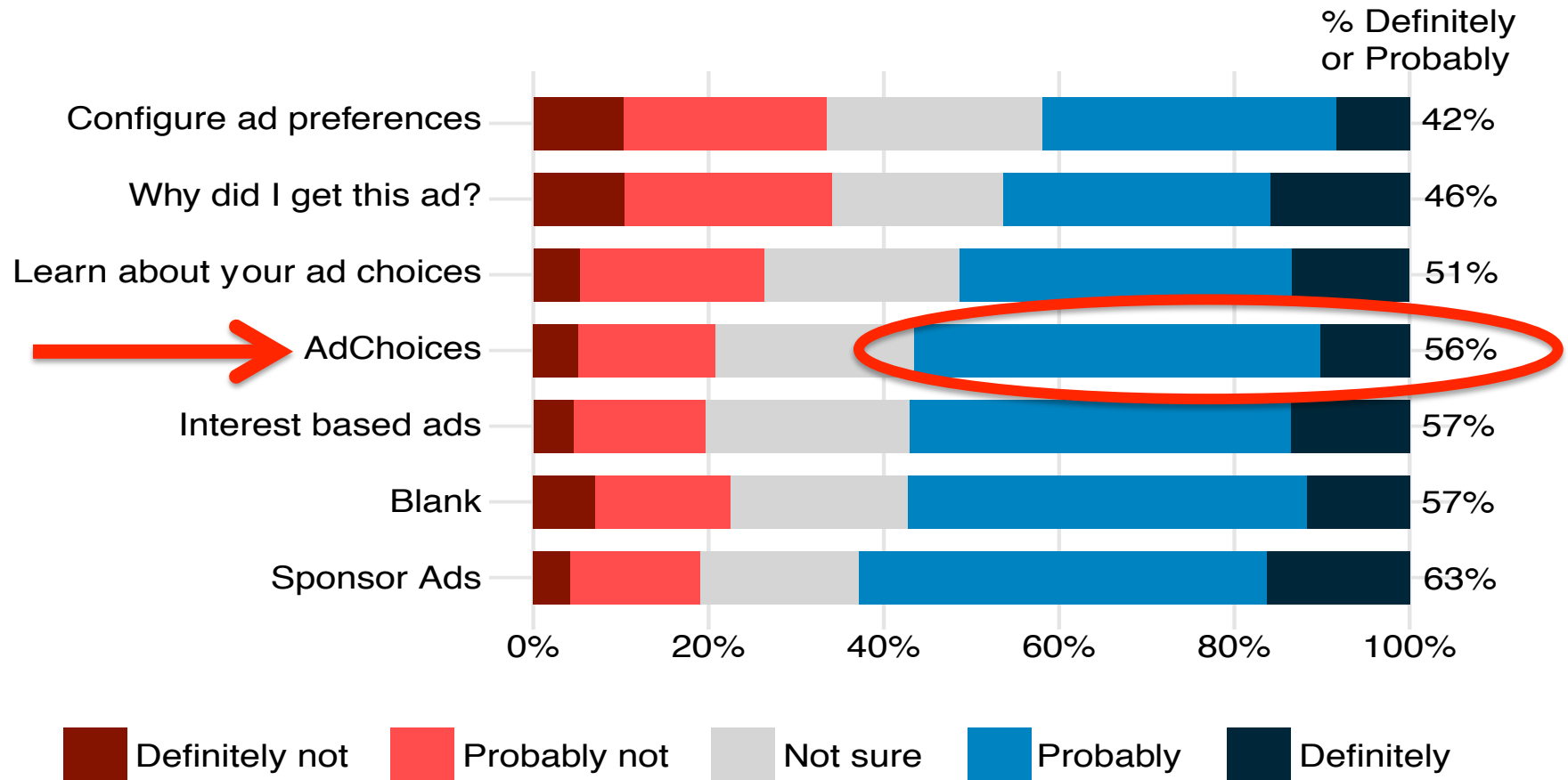
Will take you to a page where you can tell the advertising company that you do not want to receive tailored ads



Will take you to a page where you can buy advertisements on this website



More ads will pop up



Takeaways

- OBA icons and taglines are not noticed
- “AdChoices” was outperformed by other tagline treatments at communicating notice and choice about OBA
- Users are afraid to click on icon

How effective is privacy
notice and choice in practice?

Notice and Choice Mechanism	Effectiveness in Practice
Privacy policies	
Privacy nutrition labels	
Privacy Facts for Android	
P3P	
Do Not Track	
Tools to opt-out of tracking	
AdChoices icon	
Model financial privacy notice	

Notice and Choice Mechanism	Effectiveness in Practice
Privacy policies	Nobody reads
Privacy nutrition labels	Promising research, not used
Privacy Facts for Android	Promising research, not used
P3P	Used to circumvent browser privacy settings
Do Not Track	No agreement on what it means
Tools to opt-out of tracking	Difficult to use
AdChoices icon	Nobody knows what it means and people are afraid to click on it
Model financial privacy notice	Adopted by thousands of websites, could be more useful with directory

How to make notice and choice more effective

- Incentives for adoption
- Enforcement (legal and technical)
- Baseline requirements
- Standardized notice formats
- Machine-readable notice formats
- Reduce ambiguity
- Link to full disclosure
- Comparison tools
- More research

Are They Actually Any Different? Comparing Thousands of Financial Institutions' Privacy Practices

Lorrie Faith Cranor, Kelly Idouchi,
Pedro Giovanni Leon, Manya
Sleeper, Blase Ur, WEIS 2013



FACTS	WHAT DOES PNC DO WITH YOUR PERSONAL INFORMATION?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> ▪ Social Security number and income ▪ Account balances and account transactions ▪ Credit scores and payment history
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information, the reasons PNC chooses to share, and whether you can limit this sharing.

Reasons we can share your personal information	Does PNC share?	Can you limit this sharing?
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	Yes	No
For our marketing purposes — to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	Yes
For our affiliates' everyday business purposes — information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes — information about your creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	We don't share

To limit our sharing	<ul style="list-style-type: none"> ▪ Call 1-800-762-2118 — our menu will prompt you through your choice(s) ▪ Visit us online: www.PNC.com/privacy (Online Banking customers only.) <p>Please note: If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>
Questions?	Call 1-800-762-2118

FACTS **WHAT DOES CIT Group Inc. ("CIT") DO WITH YOUR PERSONAL INFORMATION?**

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

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

- Social Security Number and income
- account balances and transaction history
- credit history and credit scores

 When you are no longer our customer, we continue to share your information as described in this notice.

How? All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons CIT chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does CIT share?	Can you limit this sharing?
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	Yes	No
For our marketing purposes — to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes — information about your transaction	No	We don't share
For our affiliates' everyday business purposes — information about your creditworthiness	Yes	No
For nonaffiliates to market to you	No	No

Questions? Call: 1-800-681-[policy/index.h](http://www.pnc.com/policy/index.h)

FACTS **WHAT DOES BANK OF AMERICA DO WITH YOUR PERSONAL INFORMATION?**

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

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

- Social Security number and employment information
- account balances, transaction history and credit information
- assets and investment experience

How? All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Bank of America chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Bank of America share?	Can you limit this sharing?
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	Yes	No
For our marketing purposes — with service providers we use to offer our products and services to you (Please see below to limit the ways we contact you)	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes — Information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes — Information about your creditworthiness	Yes	No
For nonaffiliates to market to you — for all credit card accounts endorsed by another organization (e.g., debit card co-branded with a baseball team) "Sponsored Accounts"	Yes	Yes
For nonaffiliates to market to you — for accounts other than credit card accounts and Sponsored Accounts, such as insurance, investments, deposit and lending	Yes	Yes
For nonaffiliates to market to you — for accounts other than credit card accounts and Sponsored Accounts, such as insurance, investments, deposit and lending	No	We don't share

Gramm-Leach Bliley Act (1999)

- Mandated annual privacy disclosures
- Disclosures were full of fine print, difficult to read and compare



Standardized notice

- Eight federal agencies jointly released a model privacy form (2009)
 - Two pages
 - Optional, but widely adopted
 - Safe harbor

Model Privacy Form

Rev. (insert date)

FACTS			WHAT DOES [NAME OF FINANCIAL INSTITUTION] DO WITH YOUR PERSONAL INFORMATION?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.		
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> ■ Social Security number and [income] ■ [account balances] and [payment history] ■ [credit history] and [credit scores] 		
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons [name of financial institution] chooses to share; and whether you can limit this sharing.		
	Reasons we can share your personal information	Does [name of financial institution] share?	Can you limit this sharing?
	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		
	For our marketing purposes—to offer our products and services to you		
	For joint marketing with other financial companies		
	For our affiliates' everyday business purposes—information about your transactions and experiences		
	For our affiliates' everyday business purposes—information about your creditworthiness		
	For our affiliates to market to you		
	For nonaffiliates to market to you		
To limit our sharing	<ul style="list-style-type: none"> ■ Call [phone number]—our menu will prompt you through your choice(s) ■ Visit us online: [website] or ■ Mail the form below <p>Please note: If you are a <i>new</i> customer, we can begin sharing your information [30] days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>		
Questions?	Call [phone number] or go to [website]		

Mail-in Form									
<p>Leave Blank OR [If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.]</p> <p><input type="checkbox"/> Apply my choices only to me</p>	<p>Mark any/all you want to limit:</p> <p><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</p> <p><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</p> <p><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</p> <table border="1"> <tr> <td>Name</td> <td></td> </tr> <tr> <td>Address</td> <td></td> </tr> <tr> <td>City, State, Zip</td> <td></td> </tr> <tr> <td>[Account #]</td> <td></td> </tr> </table> <p>Mail to: [Name of Financial Institution] [Address1] [Address2] [City], [ST] [ZIP]</p>	Name		Address		City, State, Zip		[Account #]	
Name									
Address									
City, State, Zip									
[Account #]									

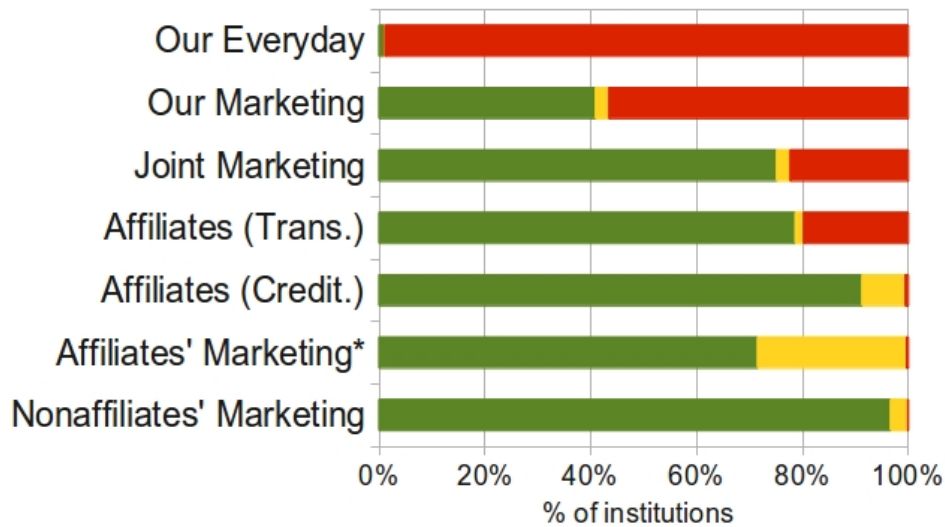
Page 2	
Who we are	
Who is providing this notice?	[insert]
What we do	
How does [name of financial institution] protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. [insert]
How does [name of financial institution] collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> ■ [open an account] or [deposit money] ■ [pay your bills] or [apply for a loan] ■ [use your credit or debit card] <p>[We also collect your personal information from other companies.] OR [We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.]</p>
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> ■ sharing for affiliates' everyday business purposes—information about your creditworthiness ■ affiliates from using your information to market to you ■ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. [See below for more on your rights under state law.]</p>
What happens when I limit sharing for an account I hold jointly with someone else?	[Your choices will apply to everyone on your account.] OR [Your choices will apply to everyone on your account—unless you tell us otherwise.]
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ■ [affiliate information]
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ■ [nonaffiliate information]
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> ■ [joint marketing information]
Other important information	
[insert other important information]	

Data collection and extraction

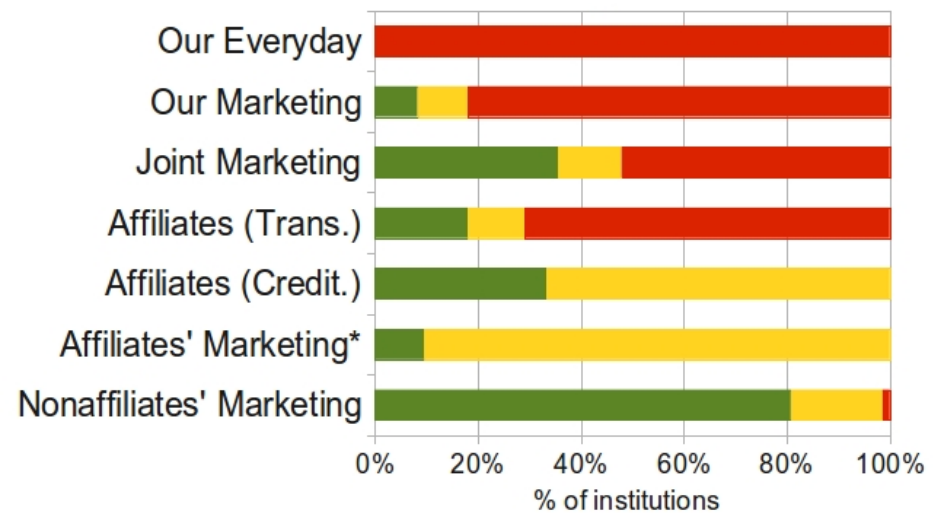
- FDIC directory of 7,072 institutions
- Searched for them all with Google queries
- Found model privacy form in HTML or PDF
- Parsed form and put it in a database
 - Many errors and deviations from model form had to be accounted for
 - Manual check shows our parsing accuracy to be >90%
- Currently collecting data for larger list FOIAed from the Federal Reserve

Sharing practices

Entire sample



100 largest banks



■ Don't share

■ Share, opt-out

■ Share, no opt-out

What Info is Collected, and How

- What: 24 options, SSN + choose exactly 5

What?

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

- Social Security number and [income]
- [account balances] and [payment history]
- [credit history] and [credit scores]

- How: 34 options, choose exactly 5

How does [name of financial institution] collect my personal information?

We collect your personal information, for example, when you

- [open an account] or [deposit money]
- [pay your bills] or [apply for a loan]
- [use your credit or debit card]

- The most commonly used terms were the examples listed in the model

Curiosities Encountered

- Self-contradictory statements (15)

Does Geneva State
Bank share?

Yes

Yes

Yes

Curiosities Encountered

- Self-contradictory statements (15)

Does Geneva State Bank share?	Can you limit this sharing?
Yes	We don't share
Yes	We don't share
Yes	We don't share

Curiosities Encountered

- Self-contradictory statements (15)

Does Geneva State Bank share?	Can you limit this sharing?
Yes	We don't share
Yes	We don't share
Yes	We don't share

- 24 institutions appear to be violating the Fair Credit Reporting Act (FCRA)
 - Not providing required opt-outs

Takeaways

- Model form needs some improvement
- Adoption happens when there are incentives
- Institutions are actually different!
 - Largest institutions have the worst practices
 - Opportunity for consumer privacy choice
- But we need to help consumers find the banks with good privacy

BANK PRIVACY Search | For Banks | About

We've collected 6,326 banks' privacy notices. See how your bank stacks up...

Look up a bank

...or find banks in your ZIP code...

Enter ZIP code

...or search for a privacy-protective bank.

Characteristic	Privacy practice
Specialization: ANY	Own marketing: ANY
Size: ANY	Joint marketing: Doesn't share
Headquarters: Maryland	Affiliates (transactions): Doesn't share
	Affiliates (creditworthiness): ANY
	Affiliates' marketing: ANY
	Nonaffiliates' marketing: ANY

Search for such a bank

Carnegie Mellon University

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



The following 7 banks meet your criteria:

Institution	Local branches	This institution's privacy practices						
		Everyday business	Our marketing	Joint marketing	Affiliates: trans...	Affiliates: credit...	Affiliates' marketing	Nonaffiliates' marketing
<u>Sandt Bank</u>	Indiana, PA	(Missing)	(Missing)	Doesn't share	Doesn't share	Doesn't share	(Missing)	Doesn't share
<u>Dollar Bank Federal Savings Bank</u>	Pittsburgh, PA	Shares	Shares	Doesn't share	Shares	Opt-out	Opt-out	Doesn't share
<u>PNC Bank National Association</u>	Wilmington, DE	Shares	Shares	Opt-out	Shares	Opt-out	Opt-out	Doesn't share
<u>Citizens Bank of Pennsylvania</u>	Philadelphia, PA	Shares	Shares	Shares	Shares	Doesn't share	Opt-out	Doesn't share
<u>Fifth Third Bank</u>	Cincinnati, OH	Shares	Shares	Shares	Shares	Opt-out	Opt-out	Doesn't share
<u>First Commonwealth Bank</u>	Indiana, PA	Shares	Shares	Shares	Shares	Opt-out	Opt-out	Doesn't share
<u>Northwest Savings Bank</u>	Warren, PA	Shares	Shares	Shares	Shares	Opt-out	Opt-out	Opt-out

Carnegie Mellon University

PNC Bank National Association

Headquartered in Wilmington, DE 19899
 Website: pnc.com

Standardized notice: [Cached](#)
 (Revised June 2013)

Reasons banks may share your personal information	Does PNC Bank National Association 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, offers opt-out 55.5% 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	Doesn't share?

The FDIC's database listed 2843 branch locations.

[Hide locations](#)

Address	City	State	ZIP
308 East Bay Street	Nassau		
130 King Street West, Suite 2140	Toronto		
10745 Highway 119 South	Alabaster	AL	35007
83183 Highway 9	Ashland	AL	36251
104 North 1st Street	Ashland	AL	36251
1044 Highway 72 East	Athens	AL	35611
2085 East University Drive	Auburn	AL	36830
1605 South College Street	Auburn	AL	36832
511 Dolive Street	Bay Minette	AL	36507
13825 South Wintzell Avenue	Bayou La Batre	AL	36509
1719 Fourth Avenue North	Bessemer	AL	35020
2407 Canterbury Road	Birmingham	AL	35223
9648 Parkway East	Birmingham	AL	35215

FOR BANKS: A TOOL FOR BUILDING PRIVACY NOTICES

This section of the site is designed for **financial institutions themselves**, rather than consumers. Our online database leverages annual GLBA privacy notices we automatically collected and parsed, as described in the "About" section of this website, as well as in greater detail in an academic paper we wrote about our project.

We at Carnegie Mellon University's CUPS lab have also designed a **free tool to help your institution prepare its privacy disclosure!** By answering the questions listed below, you will provide us enough information to automatically generate an HTML privacy notice for you following the guidelines of the model privacy notice. After you answer the questions, you will be taken to a page consisting of your privacy notice. We format notices using HTML5 and CSS. The notice we generate is self-contained; the CSS (stylesheet) is embedded in the HTML file itself. You simply need to use your browser to "Save page as." This option is normally found in a browser's "File" menu. Please let us know if you find our tool useful or have improvements to suggest. Note that this tool is still in beta testing; please report on any issues you find!

As you and your colleagues work to prepare the privacy notice for your institution, we also encourage you to reference the Federal Trade Commission's GLBA guidance pages, particularly guidance related to compliance, legal requirements, and writing effective privacy notices. In addition, the full full documentation of the model privacy form is invaluable.

Please answer the following questions so that we can generate a privacy notice for your institution:

1. What is the name of the financial institution providing the notice? (It can also be a common identity of affiliated institutions jointly providing the notice.)

Institution name (e.g., Pinnacle Bank of CMU)

2. What is your institution's contact phone number? Consumers will be instructed to call this phone number with questions or to opt out of sharing, if applicable.

Phone # (e.g., 1-800-000-0000)

3. Is the phone number you listed in the previous question a toll-free number?

Yes No

4. What is your institution's website URL? Consumers will be instructed to visit this website with questions or to opt out of sharing, if applicable.

Website URL (e.g., www.PinnacleBankCMU.com)

5. What types of personal information does your institution collect and share? Note that you must choose at least five. If you choose more than 5, only the first five will be displayed.

- Income
- Transaction history
- Credit scores
- Credit-based insurance scores
- Overdraft history
- Risk tolerance
- Mortgage rates and payments
- Employment information
- Account balances
- Transaction or loss history
- Assets
- Insurance claim history
- Purchase history
- Medical-related debts
- Retirement assets
- Wire transfer instructions
- Payment history
- Credit history
- Investment experience
- Medical information
- Account transactions
- Credit card or other debt
- Checking account information

6. Does your institution share customers' personal information for **your institution's everyday business purposes**, such as to process your transactions, maintain your account(s), respond to court orders and

Yes No

10. Does your institution share information about customers' **transactions and experiences for affiliates' everyday business purposes?**

Yes No

11. Does your institution share information about customers' **creditworthiness for affiliates' everyday business purposes?**

Yes No

12. Does your institution wish to **omit** the row of the sharing table about sharing customers' personal information for **affiliates to market to them?** If so, at least one of the following four statements also must be true: 1) your institution does not have affiliates; 2) your institution does not disclose customers' personal information to its affiliates; 3) your institution's affiliates do not use personal information in a manner that requires an opt-out; 4) your institution provides the affiliate marketing notice separately.

Yes No

13. Does your institution share personal information about customers for **nonaffiliates to market to them?**

Yes No

14. On what date has this notice been revised?

Revision date (e.g., 12/31/2014)

Build privacy notice

Rev. July 9, 2015

FACTS	WHAT DOES First City National trust DO WITH YOUR PERSONAL INFORMATION?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> ▪ Social Security number and account balances ▪ transaction history and transaction or loss history ▪ credit scores and overdraft history
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons First City National trust chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does First City National trust share?	Can you limit this sharing?
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	Yes	No
For our marketing purposes — to offer our products and services to you	Yes	Yes



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