

The Notices Project: Common Short Informing Notices

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Digital Age Privacy Laws Expect a Great Deal from Notices

- We expect notices to inform consumers about a corporation's use of information
 - Short and simple
 - Plain English
 - Explain what's not obvious
- We expect notices to give us a road map to accountability
 - Complete
 - Precisely written
- You can't accomplish both in the same notice



CIPL Believes

- Notices should be layered
 - One short informing notice
 - Linked to another longer accountability notice for complex organizations
- Short notices should be simple, easy to understand and have a common look
- Short informing notices should be educational



Research Backs This View

- Consumers can not absorb more than 7 different concepts in a notice.
- The language should not require the consumer to translate.
- Repetition in reading different notices helps the consumer understand and compare policies and practices.



CIPL Organized the Notices Project to Explore the Concept of Teaching Notices

- Supported by the Privacy Leadership Initiative and CIPL participating companies
- Participants included financial services, consumer products, data management and technology companies
- A seal program and academic advisor assisted the project



Participants Included

- Acxiom
- Citigroup
- Capital One
- DoubleClick
- IBM
- J.P. Morgan Chase & Co.
- Kodak
- Procter & Gamble
- U.S. Bancorp



Project Objectives

- Create short informing notices that:
 - Are easy to understand
 - Describe how information is used in a template like format
 - The template format
 - Improves understanding by consumers
 - Allows comparisons between companies
 - Could be used by any industry



First Phase

- First Phase Goals:
 - Agree on:
 - Issues to be conveyed
 - Common elements to be used
 - Easily understood common vocabulary
 - Determine
 - If the situational nature of privacy makes short notices possible?
 - If different industries can use the same template?



Stipulations

1. Short notices would be short and concise
2. Short notices would not include the obvious
3. The words would be as simple as possible
4. Details would be reserved for longer accountability notice



Where Are We in the Process?

- We have agreed on the six elements that should be covered by short notices.
- We have agreed what information should be conveyed in those six elements.
- We are working on the common vocabulary.



Next Steps

- Develop worksheets to assure consistency across industries
- Test the elements and common words with consumers
- Discuss the elements and language with consumer leaders
- Design a format(s) that will work for consumers



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