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FOR INFORMATION
POLICY LEADERSHIP
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May 29, 2007

Office of the Secretary
Federal Trade Commission
Room 135 (Annex C)
600 Pennsylvania, Avenue
Washington, D.C. 20580

Re: Model Privacy Form, FTC File No. P034815

Dear Sirs and Madams:

The Center for Information Policy Leadership at Hunton & Williams LLP appreciates this opportunity to file comments in response to Model Privacy Form, FTC File No. P034815. The Center is a business process-oriented think tank supported by forty organizations. The Center's members include financial as well as non-financial companies. The Center develops processes that promote use of information to create economic and social value while furthering data privacy and security and protecting consumers from harm. The Center's views are its own, and do not necessarily reflect the views of its members, Hunton & Williams LLP, or any clients of Hunton & Williams LLP.

The Center has been deeply involved in the development of systems of privacy notices that are easy to understand, complete and legally compliant. To facilitate the creation of such notices, the Center developed the concept and prototype for multilayered notices. It coordinated a global effort by governments, data protection authorities, civil society and business to create an international norm for notices. That work included a session and resolution at the 25th Annual International Data Protection Conference in Sydney, Australia; a global workshop in Berlin and the development of the Berlin Memorandum; and the adoption of a common position by the Article 29 Working Party of the European Commission. Numerous businesses and government agencies have adopted the multi-

layered notice format, including the U.S. Postal Service, the Australian government, the New Zealand Data Protection Commissioner, and the British Columbia Information Commissioner. As an outcome of this work, the Center published “Ten Steps to Effect Multi-Layered Notices,” which is attached as an appendix to these comments and referred to later in this submission.

The primary focus of these comments is not the issues specific to financial services companies as they consider whether to adopt the proposed model. Many other organizations will comment on those issues. Instead, the Center will address the value of the research and the strengths and limitations of the resulting model form.

1. The research and public process conducted by the financial services regulators provides important information and insights about how privacy notices should be designed to best serve consumers.

The research conducted to develop this model provides critical information not only about the model for Gramm-Leach-Bliley notices, but also about privacy notices more generally.

In engaging the services of the Kleinman Communications Group, the federal financial services regulators underscored the importance of conducting in-depth, disciplined research when writing rules about privacy. The research conducted by Kleinman set measurable objectives and proceeded without preconceived notions about outcomes. The research provides insight into what effectively communicates to consumers. It reveals important information about how people learn about privacy, about the use of tables to facilitate comparisons across companies, and about the need to inform consumers about why they are receiving a privacy notice. In addition, the regulators solicited the input of a full range of constituencies concerned with Gramm-Leach-Bliley notices, who brought a practical perspective to the process. Businesses, policymakers and advocates can learn a great deal from the research and the process engaged in by the regulators.

2. The proposed model format narrowly addresses the requirements of Gramm-Leach-Bliley, but may lack flexibility necessary for widespread adoption by companies

The Regulatory Relief Act of 2006 required the agencies regulating entities subject to the requirements of Gramm-Leach-Bliley to propose by April 11, 2007 a model form for making the required Gramm-Leach-Bliley annual privacy disclosure. The model form was to meet the following requirements:

- (A) *Be comprehensible to consumers, with a clear format and design;*
- (B) *Provide for clear and conspicuous disclosures;*

(C) Enable consumers easily to identify the sharing practices of a financial institution and to compare privacy practices among financial institutions; and

(D) Be succinct, and use an easily readable type font.

The proposed form meets all of the objectives set forth in the Regulatory Relief Act of 2006. However, the model form will only be effective if financial institutions actually implement it. It is not clear to the Center that the proposed form is sufficiently flexible and adaptable to evolving, complex business requirements to be optimally useful to companies and consumers. In addition, providing the notice in the manner prescribed will introduce additional costs to companies that does not result in a commensurate increase in privacy awareness for consumers.

A. The model form lacks necessary flexibility.

The research conducted to develop the model notice was narrowly focused to support the specific requirements that Gramm-Leach-Bliley sets forth for consumer privacy notices. In reality, however, Gramm Leach Bliley represents only one issue about which financial services institutions must inform consumers. Further, it responds to the needs of a very specific business model, in which privacy concerns almost exclusively involve information sharing. There are, however, privacy issues in addition to sharing that companies must address, and financial services companies need to comply with other laws regulating those uses of information, such as the California On-line Privacy Protection Act. The model form would make compliance with those other laws more difficult, making it necessary for some companies to send a second privacy notice just to comply with those additional rules. Moreover, for many institutions robust privacy protection and the resulting benefit to customer relations and brand reputation presents a competitive advantage. The prohibition against introducing additional elements into the notice, and the absence of a “Other Important Information” section makes the model form unattractive to those companies.

The model format also lacks the flexibility necessary to easily adapt to new business technologies and practices used to communicate with customers. In particular, the model format is designed for a paper-based environment, at a time when more and more communications with consumers occur electronically. It would be necessary to make, and arguably obtain government approval of, significant alterations to the proposed model format to render it usable in online, electronic interactions.

Moreover, many companies are defined as financial institutions that are neither depositories nor credit card issuers. For example, personal financial management software providers that include an online interface with financial institutions are considered to be financial institutions as well. It is not clear that all the context of the model form makes sense for these companies.

B. The model format is unduly costly.

Privacy is important to companies and their customers, but it is not the only consumer issue businesses must manage. The model form has the potential to be expensive and not fit within existing business processes, taking resources away from other initiatives.

While consumers should be educated about the use and protection of information about them, mailing notices annually to consumers is costly and reputedly does not add to the consumers understanding of privacy. Consumers have shown little interest in reading notices other than when they request them directly, when they are beginning a relationship with a business, or when there are changed circumstances. However, Gramm-Leach-Bliley requires that an annual notice be sent to the consumer. The model form exacerbates a less than optimal situation because of the required length of its presentation (three pages) and because of the rules required that it be mailed annually. These requirements increase costs, and create a disincentive for financial institutions to use the new form. It may make more sense to send the form to consumers at the time that a business relationship is entered into between the business and consumer, and use a shorter form for the annual notice as required by law.

Further, as more organizations become more conscious of environmental issues in their business processes, the length of this notice, and the need the notice may create to send supplemental notices to meet other privacy requirements runs counter to industry efforts to address environmental concerns.

As stated earlier, many aspects of the model format, *e.g.*, its use of tables, framing behavior against a norm, and defining the purpose of the notice, offer benefits to companies and consumers. However, if financial institutions find this notice difficult to adapt to changing business requirements, or too expensive to implement, the improvements the model format offers will not be available to the market.

3. The model proposed is not broadly applicable to companies not governed by the requirements of Gramm-Leach-Bliley and does not correspond to international norms about privacy notices.

The financial services regulatory agencies invested significant resources in developing the narrowly focused research that supports this specific model form. However, this form applies to privacy in a regulated industry whose governing laws allow for specific kinds of data sharing. These kinds of data sharing arrangements are unique to the financial services industry and do not reflect data practices of companies outside of that sector.

While the Federal Trade Commission has encouraged organizations outside of the financial services industry to develop privacy notices that are simple and easy to understand, the FTC must recognize that while this model form may work for financial services organizations and the kinds of data sharing in which it engages, it has no

applicability to notices in general commerce. Most industries can not reduce privacy to the seven classes of sharing of the information that are reflected in the model form.

Moreover, the provisions of Gramm-Leach-Bliley specify that only some elements of fair information practices as expressed in the Privacy Guidelines of the Organization for Economic Cooperation and Development, and in the Asia Pacific Economic Cooperation Framework be reflected in the notices. This model form does not incorporate an expression of these practices, which may be necessary for comprehensive notice and is insufficient in broader commerce.

Also of concern, the model form blurs the concepts of information “sharing” and of information “use.” The Center suggests that the regulatory agencies have an interest in educating the American public about the important difference between these two concepts. Given that in the 21st century consumers will have to make important decisions regarding the use and sharing of their personal information by public and private institutions, the model form should aim to keep those two concepts separate and clearly distinguished.

Further, given the global nature of data flows, it is increasingly important that privacy notices link to international norms. Companies like IBM, P&G, Lenovo, Microsoft, and the United States Postal Service appreciate this need and publish notices that are in a common format, have been approved in Europe, and are endorsed by privacy agencies in Asia. This international linkage is very important to the success of their business models and their ability to efficiently serve consumers.

4. The proposed model notice is narrowly applicable to financial services companies in a paper-based environment, but does not serve evolving information collection and sharing models and emerging data collection technologies.

The model form addresses issues that were raised when banking and financial transactions were conducted in a paper-based environment. Information technology has changed the manner in which information is collected, matched with other data, and used to create economic and social value, both in financial services and in other industries. It has also enabled real time communication to customers (and other consumers) online.

Notices must be adaptable to online businesses and transactions, and must serve international data flows. In addition, the emergence of new data collection technologies, such as radio frequency identification and near-field computing introduce the possibility of data collection and sharing in ways that consumers would not anticipate. Concise notices that can be read in real time - “notice-at-a-glance” - will be necessary to provide key information to consumers as they engage with these new technologies. While the research will help to inform the best manner to deploy this kind of notice, the model format will not resolve the concerns these new technologies and information management practices raise.

5. Conclusion

The strength of the model notice is also its weakness. The researchers focused on creating a notice to educate consumers about the sharing of information in financial services markets. They developed a model form that perfectly meets that need. However, the model form may not be used by financial institutions because of its cost and its lack of flexibility. Furthermore, this model form does not link to the evolving international standard, and has limited application outside of financial services.

The Center urges that, going forward, regulators be mindful of the need for notices that reflect and serve the needs of a dynamic business and technology environment and international data flows. As the regulators consider these remarks, and the remarks submitted by other stakeholders, the Center urges them to refer to the multilayered notice¹ the Center developed that has been widely adopted by companies with an international presence. See attached. The multilayered notice was developed through a dialogue among data protection authorities, governments, business and consumers advocates. It seeks to provide a flexible, compliant model that can be adapted to changing business models and evolving technologies and processes.

We are happy to answer any questions, and look forward to working with the regulators as their effort on this important issue continues.

Respectfully submitted,

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¹ A layered notice is one that meets all consumers privacy needs for understanding and completeness. The heart of the layered noticed is a template that highlights key aspects of the privacy policy, and in so doing, provides the consumer with the essential elements of how information is managed by an organization. Online, this highlights notice links to complete notice that gives the interested consumer a complete picture of how information is managed. This complete notice is also available in printed form upon request. Where space is limited, such as on a mobile phone, an organization may provide the consumer with an initial layer that identifies the collecting organization's name, and where the consumer may obtain subsequent layers that provide more complete information.

APPENDIX

MODEL PRIVACY FORM, FTC File No. P034815

Ten steps to develop a multilayered privacy notice

Prepared by
leading lawyers and experts in privacy with
The Center for Information Policy Leadership

THE CENTER
FOR INFORMATION
POLICY LEADERSHIP
HUNTON & WILLIAMS LLP

Foreword

Experts agree that good privacy begins with effective transparency. Transparency requires privacy notices that are easy to understand, facilitate comparison, and are actionable. Privacy notices must also comply with legal requirements that may differ from country to country, and jurisdiction to jurisdiction. Research on how people learn has shown that for notices to be easy to read and understand, they must be short, use plain language, and be presented in a common format. Complete notices tend to be longer and more complex, so it is impossible to have both sets of requirements in one document. A multilayered notice is made up of a condensed notice that contains all the key factors in a way that is easy to understand and is actionable, and a complete notice with all the legal requirements. A growing number of privacy officials and experts agree that multilayered notices meet the transparency objective. Corporate and government sponsored research shows that multilayered notices build both trust and compliance. The work of the European Article 29 Working Party gives us confidence that layering a privacy notice is legally compliant.

The purpose of this ten step guide is to help privacy practitioners in organizations of all sizes to assess their privacy notices and build effective multilayered notices, if appropriate.

After several years of testing and development, the international privacy community has begun to adopt multilayered privacy notices that make it easy for consumers to understand how their information is used and protected, and to compare companies' privacy policies. These new notices also encourage compliance and make it possible for organizations to use the same privacy notices worldwide. While there are still differences of opinion on notice content, we are at a point where organizations may feel comfortable using the notices discussed in this ten step guide to develop an easy to read and compare privacy notice, compliant with the emerging standard.

The guide begins with background on multilayered notices and a discussion of why you might like to change or update your notice. It then provides the reader with ten steps that can be followed by organizations of all sizes when developing multilayered privacy notices. Finally, the guide provides the reader with resources available on the internet for reference when developing a multilayered notice.

Background

With the growth of the internet in the 1990s, more and more organizations began publishing privacy notices. The complexity of the notices began to mirror the increasing complexity of information practices. Consumers found these notices confusing, and policymakers began to realize that the notices were failing to give the individual a clear picture of how their information would be used. Organizations had conflicting goals of creating notices that were easy to understand, complete, and compliant. By 2003, privacy leaders were beginning to discuss a concept called layered notices. A layered notice would be a short notice in a common template format, combined with a longer complete notice. This concept was endorsed by the 25th International Data Protection Conference, held in Sydney, Australia in 2003.

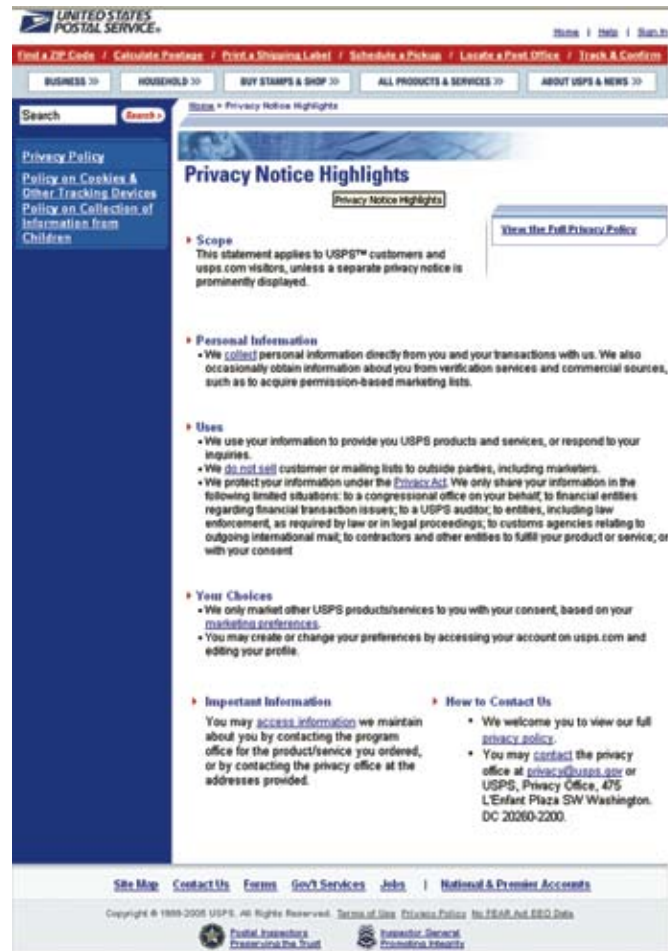
This basic concept was explored further at a workshop in Berlin in March 2004. The workshop, attended by data protection commissioners, other government officials, European consumer leaders and business, led to the Berlin Memorandum. The memorandum called for multilayered notices to be made up of as many as three layers. The additional layer would be a very short notice designed for use on portable digital devices, coupons and other places where space would be very limited. The Berlin Memorandum was discussed by the European Union's Article 29 Working Party, which adopted a common position endorsing multilayered notices in December 2004.

The Australian Data Protection Commissioner recommended this evolving norm in a 2005 review of the Australian private sector privacy law. The Australian government subsequently adopted a layered notice

on its website. The Ontario Information Commissioner, working with the Ontario Bar Association, used layered notices as the basis for their new health care privacy notices. The US Postal Service adopted a multilayered notice in July 2005. The Data Protection Commissioners of New Zealand and British Columbia became the first Data Protection Agencies to publish condensed notices in November 2005.

Example

USPS notice



The first layered notices began appearing on US business websites in 2003. Companies began publishing multilayered notices in different languages in 2005. There are now condensed notices in over forty languages, including Arabic, Chinese, French, German, Korean, Japanese, Polish, and Russian.

This guide follows the recommendations in the European Union (EU) Article 29 common position of December 2004, which has gained wide acceptance within and outside the EU. This structure is as follows.

- Layer 1 - The short notice: the very minimum, for example, when space is very limited, providing only the identity of the data controller, contact details, and the purposes of processing.
- Layer 2 - The condensed notice: covering the basics in less than a page, ideally using subheadings, and covering Scope; Personal information collected; Uses and sharing; Choices (including any access options); Important information; How to contact us.

→ Layer 3 - The full notice.

Why create a multilayered notice?

Privacy notices must be kept current. When updating the notice, organizations should strongly consider the multilayered approach. Multilayered notices are a big 'win' for organizations, consumers, and regulators.

Companies win because multilayered notices easily build consumer trust. Research conducted in Hong Kong, Germany, the United Kingdom, and the United States shows that consumers prefer the template-based condensed notice to longer text-based notices. The US Postal Service changed its notice when the template-based notice scored highest in a survey of public trust. Consumers like multilayered notices because they like information that is clear, graphically appealing, and easy to compare.

Companies also win because regulators in Europe and the Asia Pacific regions have agreed on the core concepts that need to be covered in short and condensed notices. This results in a single notice that can be translated into many languages, rather than a notice with different text for each country. This makes web notices much easier. P&G, MSN, and IBM have all published their web-based notices in more than 40 different languages.

Example

P&G French notice

the P&G network cliquez ici pour retourner sur fr.pg.com

Procter & Gamble

Déclaration de confidentialité de P&G

Domaine d'action
Cette déclaration s'applique aux sites Internet exploités par ou pour le compte de The Procter & Gamble Company et ses sociétés affiliées et filiales (P&G).

Procter & Gamble Privacy notice

Informations personnelles

[Cliquez](#)

[ici](#) pour de plus amples informations

- Nous collectons les informations que vous choisissez de donner, telles que votre adresse e-mail ou postale.
- Nous collectons des informations non personnelles telles que le type de navigateur, le système d'exploitation et les pages Internet visitées pour nous aider à gérer nos sites.
- Nous utilisons des cookies et d'autres technologies Internet pour gérer nos programmes e-mail et Internet. Nous n'utilisons pas ces technologies pour collecter ou conserver des informations personnelles.
- Il est possible que nous obtenions des informations supplémentaires vous concernant, telles que des informations démographiques, provenant de sources disponibles dans le commerce.

Utilisations

[Cliquez](#)

[ici](#) pour de plus amples informations

- Nous utilisons vos informations personnelles pour vous fournir les données et échantillons demandés, pour vous apporter une utilisation interactive personnalisée, et pour nous aider à développer de nouveaux produits et services qui répondent à vos besoins.
- Nous ne communiquerons pas vos informations personnelles à d'autres sociétés commerciales sauf si nous vous l'avons demandé et si nous avons obtenu votre consentement explicite. Si vous ne nous avez pas donné votre consentement, nous ne communiquerons pas vos informations personnelles.
- Nous utilisons les informations personnelles que vous nous avez fournies uniquement dans un but conforme à la raison pour laquelle vous nous les avez fournies.
- Lorsque nous fournissons, de façon temporaire, des informations personnelles aux sociétés qui nous prêtent leurs services, par exemple pour vous envoyer des e-mails ou des échantillons, nous demandons à ces sociétés de protéger les informations de la même façon que P&G. Ces sociétés de service ne peuvent utiliser vos informations personnelles dans un but différent de celui pour lequel vous les avez fournies à P&G.

Vos droits et choix

[Cliquez](#)

[ici](#) pour de plus amples informations

- Vous avez le droit de posséder une copie des informations personnelles que vous avez fournies et de les modifier ou les actualiser.
- Vous pouvez demander à P&G de supprimer tout consentement préalable que vous auriez donné pour divulguer vos informations personnelles à d'autres sociétés commerciales.
- Vous pouvez demander à P&G de vous supprimer des programmes que vous avez souscrits à l'aide du lien de désinscription figurant dans nos programmes d'e-mail ou du lien ci-dessous.
- [Cliquez ici](#) pour sélectionner votre pays et pour être redirigé à l'adresse correcte à utiliser pour obtenir une copie des informations personnelles que vous avez fournies, supprimer votre consentement concernant la divulgation d'informations ou être supprimé de nos programmes.

Comment nous contacter

- Pour nous contacter avec une question [cliquez ici](#) (pour les adresses spécifiques des pays)
Ou écrivez-nous à :
P&G Privacy Team
2 P&G Plaza
Cincinnati, OH 45202 USA
- Pour lire toute notre Déclaration de confidentialité en ligne [cliquez ici](#).
- Notre politique générale de confidentialité fournit des informations sur la façon dont nous protégeons d'autres types d'informations personnelles, tel que celles des employés ou des candidats. Pour lire notre politique générale de confidentialité, [cliquez ici](#).

Informations importantes

- P&G s'engage à travailler avec les consommateurs pour obtenir une résolution juste de toute réclamation ou problème concernant la confidentialité.
- P&G respecte les lois de protections des données des pays.
- Nous coopérons avec les autorités de protection des données des pays si elles pensent qu'un problème de confidentialité s'est produit.
- La confidentialité de nos sites américains est certifiée par le cachet de confidentialité du Better Business Bureau (Bureau d'éthique commerciale) [Online](#) des États-Unis.

Data protection authorities like multilayered notices because they increase public understanding of privacy and data protection — a clear goal for regulation. Many regulators also believe that multilayered notices will result in increased compliance with existing notice requirements.

The bottom line is that all parties win when privacy notices are easy to read and understand.

Creating a multilayered notice

Creating a privacy notice should not be viewed as an intimidating process. Developing a multilayered notice is no more difficult than a full legally compliant notice. If an organization has already created a full legally compliant notice, they can skip the first 5 steps below and move directly to creating a condensed notice in step 6. Good practice principles would suggest a legal review before publishing any notice.

The ten steps

Step 1 Determine what your company does with personal data

Catalogue the organization's collection, use, sharing, protection, and destruction of information that is about individuals. There are many means of doing this. You could start with the data and map its flows throughout the organization. You could also begin with the uses, and determine the data needed to fulfill those uses. An organization must understand its data flows before creating notices.

- What personally identifiable data is collected directly from individuals, from transactions with individuals, or from third parties?
- Where is that information collected?
- How is the information used by the organization?
- Is it shared with third parties? If so, with whom, and for what purposes?
- How long is the information kept? How is it destroyed?
- How is the information secured?
- What choices does the individual have related to that use, retention, and sharing of information?
- Does the consumer have opportunities to access and make corrections related to the information, either because of requirements in law or policy in the organization?

The OECD, the US Direct Marketing Association, and many other organizations have websites, guides, and online tools that may help you develop your full notice.

Step 2 Determine whether your company's treatment of personal data is legally compliant

Review the laws, regulations, industry codes, contracts, and corporate promises that cover the collection and use of personally identifiable information to make sure the processes mapped meet legal expectations.

- Is the data or use covered by law or industry codes of conduct?
- Is there a contract in place to limit data use?

-
- Is the data limited by consumers' choices exercised either directly with the organization or with third parties?
 - Does the law require special notifications or disclosures to consumers? If so, how must those notifications or disclosures be addressed?

Step 3 Develop and test an internal privacy policy that reflects how your company treats personal data

Write an internal information policy to describe the processes. Make sure that the employees covered by the policy understand it.

- The internal policy should match the organization's culture. Write it in a way that matches the organization's identity standards, bearing in mind plain language.
- Test the policy with the legal department and other senior stakeholders.
- Test with line managers to make sure the internal policy actually reflects corporate behavior.
- Finally, test with employees to make sure they understand the policies. This testing should be done in a way that actually tests current compliance.

Step 4 Use that internal policy to create the organization's complete external privacy policy

Make sure the external policy is consistent with the practices in step 1. This is the long, complete policy that meets all compliance requirements.

- Have you included all the legal requirements in the complete notice? If you are using the complete notice in many countries, it might have special sections to address particular national requirements.
- Have you included every significant use and sharing? Don't forget to mention if you use outside vendors, agents, and processors.
- Have you discussed information security? While the condensed notice doesn't require a security section, almost all complete notices should.

Step 5 Test and revise the full privacy notice

Test the language and structure of the complete external policy to make sure it is understood by the target audience.

- Is the long notice in language that most individuals would understand? Just because the notice is long doesn't mean it should be hard to read. You should not need a university education to understand the notice. Keep the sentences simple and easy to read. Consistently use the same words to mean the same thing. This will also help translation.

Test the notice directly with consumers. This testing need not be costly. You can test a notice on your organization's website. Once you have tested the notice you should revise it based on the research, and then retest.

Step 6 Create the condensed notice

Summarize the main elements of the complete policy in the six categories of the condensed notice. Use language that is easy to understand. If possible, take sentences directly from the full notice. This will help with consistency. You should compare the condensed and complete notices to make sure that

nothing has been left out of the condensed notice that is important or would be beyond the reasonable expectations of individuals.

→ **Scope**

Who is covered by the notice? The organization collecting the information? A family of companies? An entire industry? The scope should be defined clearly in as few sentences as possible. You should avoid long lists of affiliates - that detail should be in the longer notice.

Example

Scope

This statement applies to XYZ company Web Sites Worldwide.

→ **Personal information collected**

This section should describe the types of information collected from the individual, from transactions with the individual, and from third parties about the individual. You should mention information gained from third parties such as credit bureaus or credit referencing services used to make decisions about the individual. You should also mention if you use cookies, if they are linked to personally identifiable information.

Example

Personal information

- We collect information you choose to provide during your registration.
- We use common internet technologies, such as cookies and beacons, on our websites and emails.
- We sometimes obtain additional information about you from other sources, such as your demographics and lifestyle information.
- For more information about our information collection practices, please [click here](#).

→ **Uses and sharing**

This section discusses how the organization uses the information it collects. The organization should describe its own uses, uses by affiliated parties not listed in the scope, and non-affiliated sharing. The organization should list its own uses first, followed by affiliates and then non-affiliated third parties.

There has been a great deal of discussion about whether to mention sharing with vendors and agents in the condensed notice. Discussions with consumer, business, and data protection agency privacy leaders have led to a consensus that, in most cases, sharing with vendors and agents should be covered in the long notice. Any use and sharing that would be beyond the reasonable expectations of individuals, however, should be highlighted in the condensed notice.

Example

Uses

- We use personal information to provide you with information and samples you request, and to help us develop new products and services that meet your needs.
- We do not share your personal information with other marketers unless we have asked for and obtained your explicit consent. If you do not provide your consent, we will not share your information.
- We will use personal information you provide only for purposes consistent with the reason you provided it.
- When we temporarily provide personal information to companies that perform services for us, such as to send you email or samples, we require those companies to protect the information in the same manner as XYZ. These service companies cannot use your personal information for any other purpose than the reason you provided it to XYZ.

→ Choices

This section would include choices the individual has relating to the information collected and used. In some instances the choices are consents, while in other instances they are opt-outs. In many jurisdictions the consumer has the right to request access to information and request corrections or deletions. These choices should be in this section.

Example

Choices

- You may access personal information that we hold about you. You can ask us to correct any errors or delete the information we have about you.
- You may opt-out of any further contact from us.
- To protect your privacy and the privacy of others, we may have to verify that you are who you say you are before we can give you access to, or change, information about you.

→ Important information

Every organization has factors unique to its management of personally identifiable information. Some organizations have seal programs, while other organizations have special protections for information. This section is where organizations would place seals and other important facts. You could also mention special legal requirements in a particular jurisdiction, or information about where a person can complain.

Example

Important information

BBBOnline reviews and enforces our compliance with this privacy notice. XYZ participates in the EU/Department of Commerce Safe Harbor Program.

→ How to contact us

The last section gives the individual information on how to contact the organization for a complete notice, to ask questions, and to exercise choices. Many organizations give the individual more than one way to contact the organization.

Example

How to contact us

E-mail: privacy@xyz.com.

By post: XYZ, Privacy Office, 475 Morningside Drive, Rochester, NY 12345.

To see our full privacy policy, [click here](#).

Step 7 Harmonize the full and condensed notices together

Now that you have developed the condensed notice it is time to go back and look at the full notice to see if there are any format changes to make them consistent. In some countries, many consumers will want to see the full notice. The complete and condensed notice must work together whether the complete notice will be available from a click-through on-line, or on request off-line.

- Does the complete notice need to be reorganized so that topics are in the same order as the condensed notice?
- On-line, do you want to hyperlink the complete and condensed notice?
- Are there words and phrases that need to be made consistent?
- Do the two notices reflect the same organizational identity?

Step 8 Create the short notice

If the organization collects information over a hand-held computer, mobile phone, or with coupons, you should now develop the short notice for these applications.

The short notice must contain three items of information.

- Who is collecting the information?
- What is the primary use for the information? You should also include non-primary uses that would be beyond the reasonable expectations of the consumer.

-
- Can you contact the organization easily for the condensed or complete notice? For example, maybe through a phone number, e-mail address or a message saying 'text 123 for more information.'

Step 9 Review and test the multilayered notices

It is important to see whether the target audience understands how the three layers work together. This may be through consumer research on your website. Finally, you should read through the notices again to make sure that there is nothing in the complete notice that would be beyond the reasonable expectations of the consumer, that has been left out of the condensed notice. In some jurisdictions, this lack of consistency might be perceived as deliberate deception.

- Do the layers work together?
- Are there important facts that have been left out of the notice?
- Are all the notices consistent? Would the reader be surprised reading the full notice after reading the condensed notice?

Step 10 Publish your new multilayered notice

Make sure the various layers are published in the correct locations. All employees with consumer contact must be aware of the notice layers and how to provide a complete notice when asked.

- Have your consumer affairs staff been educated on the various notice layers?
- Can they explain your policies to the intended audiences?
- Have you placed the various layers where they legally must be placed, as well as where you want them placed to build trust?

Resources

For more information and for the documents referenced in this paper, please visit the Center for Information Policy Leadership at www.informationpolicycenter.com. You will also find useful information at:

- 1 Direct Marketing Association Privacy Policy Generators
www.the-dma.org/privacy/privacypolicygenerator.shtml
- 2 BBBOnLine
www.bbbonline.org/reliability/privacy/
- 3 OECD Privacy Statement Generator
www.oecd.org/sti/privacygenerator

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Government of Australia


The screenshot displays the Australia.gov.au website interface. At the top, there is a header with the Australian Government logo, the text 'Australia.gov.au Your connection with government', and navigation links for 'ABOUT THIS SITE', 'CONTACT US', and 'HELP'. Below the header is a secondary navigation bar with links for 'HOME', 'GOVERNMENT IN AUSTRALIA', 'WEBSITES A TO Z', 'PUBLICATIONS', 'MEDIA', 'WEB FEEDS', and 'CONTACTS'. The main content area is titled 'Privacy Notice Highlights' and is organized into several sections:

- SCOPE:** This statement applies to the australia.gov.au website only. The website is managed by the Department of Finance and Administration.
- PERSONAL INFORMATION:** Australia.gov.au collects personal information that you choose to give us, for example your email address. We do not collect identifiable personal information about you if you only browse this website.
- USES:** We only use your personal information for the purposes for which you gave it to us. We do not share information about you with other government agencies or other organisations without your permission unless it:
 - is necessary to provide you with a service that you have requested;
 - is required or authorised by law; or
 - will prevent or lessen a serious and imminent threat to somebody's health.We analyse non-identifiable web site traffic data to improve our services. We do not use cookies or web bugs.
- YOUR CHOICES:** You may gain access to personal information about you that we hold. You can have us correct any errors or delete the information we have about you. You may opt out of any further contact from us. To protect your privacy and the privacy of others, we may have to gain evidence of your identity before we can give you access to information about you or change it.
- IMPORTANT INFORMATION:** This website is bound by the Information Privacy Principles of the Privacy Act 1988. We also follow the Guidelines for Federal and ACT Government Websites issued by the Office of the Privacy Commissioner.
- HOW TO CONTACT US:** [Contact us](#) about any of your privacy concerns or to suggest further improvements to this website. Alternatively, write to us at:
Manager, australia.gov.au
Australian Government Information Management Office
Department of Finance and Administration
John Gorton Building
King Edwards Terrace
Parkes ACT 2600
AUSTRALIA
For more information about our privacy practices, see our [full privacy statement](#).

At the bottom of the page, there is a footer with links for 'Privacy', 'Copyright', 'Disclaimer', 'Accessibility', and 'Site Map'.

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Chase (English)




Home About Us Careers Contact Us Find Us Privacy & Security Site Map

Individuals Small Business Advice & Planning Customer Center

Privacy & Security Privacy Highlights

Search

Log On



Privacy Policy Highlights

Related Topics

- > Privacy Highlights
- > Privacy Policy
- > Online Consumer Information Practices
- > Online Security Measures
- > Online Security Tips
- > Your Privacy Choices
- > Protect Your Identity
- > FAQs

Contact Us on questions regarding privacy & security.

Important Security Reminder
Protect the security of your online account.

For more information, read our [Full Privacy Policy](#).

PERSONAL INFORMATION

- We get information from your requests for our products or services. One example is income on loan applications.
- We get information about your transactions with us and with others. For example, we have your account balance information.
- We get information, such as your credit history, from credit bureaus.

SCOPE

- These statements apply to the Chase and Bank One family of companies owned by JPMorgan Chase & Co. and to our consumer customers.

USES

- We manage information to serve you.
- We may share information about you within our family to offer you financial products and services.
- We may share information about you with outside companies that work for us. These may include firms that assist in marketing our products.
- We may share information about you with outside financial companies to allow you the opportunity to receive additional products or services.
- We may share information about you outside of our family as permitted by law, including our service providers, credit bureaus and law enforcement.

YOUR PRIVACY CHOICES

- You may tell us not to share information about you with non-financial companies outside of our family of companies.
- You may tell us not to share certain information about you within our family of companies.
- To make any of these choices, submit your privacy choices [online](#) or contact us at 1-888-868-8618.

IMPORTANT INFORMATION

- Review helpful information on [identity theft](#) or how to get help if you become a victim.
- View our [online consumer information practices](#).
- View the [Privacy & Security FAQs](#).
- Some states have different privacy provisions.

HOW TO REACH US

- [Contact us](#) via email or by calling 1-888-868-8618.
- Submit your privacy choices [online](#).

For more information, read our [Full Privacy Policy](#).

This site is directed at persons in the United States only. Persons outside the United States may visit [International Banking](#).

[En Español](#)

Home | JPMorgan | JPMorgan Chase

[Terms & Conditions](#)
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MSN (Japanese)

msn.co.jp **msn** MSN プライバシーに関する通知 ご意見ご感想

最終更新日: 2005 年 3 月



この通知について

本通知は、[MSN プライバシーに関する声明](#)の全文に対するダイジェスト版です。本通知およびプライバシーに関する声明の全文は、MSN の Web サイトおよびサービスに適用されます。

個人情報の収集

[詳細情報](#)

- MSN では、お客様が MSN のサービスに登録する際、お客様に個人情報をお尋ねしています。
- 収集した情報を、他の Microsoft Corporation のサービスおよび他社から取得した情報と結合することもあります。
- MSN では、お客様と MSN のサイトおよびサービスのやりとりを記録し、お客様ごとのサービスを提供するために、Cookie およびその他の技術を使用しています。

オプション

[詳細情報](#)

- お客様と MSN の連絡方法を選択するには、「[MSN プライバシーの紹介](#)」にアクセスしてください。
- MSN ニュースレターの購読の申し込みや解除を行うには、Hotmail の「[無料メールマガジン](#)」の設定ページにアクセスしてください (英語版の MSN ニュースレターについては、[newsletters.msn.com](#) にアクセスします)。
- 個人情報の表示および編集方法については、「[個人情報の管理](#)」を参照してください。

個人情報の利用

[詳細情報](#)

- MSN では、お客様の要求にお応えするサービスを配信するために、情報を収集しています。MSN のサービスでは、お客様の興味に合わせたコンテンツおよび広告が表示されることがあります。
- MSN では、お客様の個人情報を利用して、Microsoft Corporation およびその関連会社が提供するその他の製品を宣伝したり、MSN のサービスに関するアンケートのお願いを送信しています。
- MSN が顧客リストを第三者に販売したり貸し出したりすることはありません。ただし、サービスの提供を促進するため、個人情報の取扱いの全部又は一部を他社に委託することがあります。

重要な情報

- 特定の MSN サービスに関する情報については、[プライバシーに関する声明 \(全文\)](#) の「[特定の MSN サイトおよびサービスに関する特定情報](#)」をよくお読みください。
- MSN の登録サービスおよびサインイン サービスには、Microsoft Passport Network を使用しています。Passport サービスの詳細については、[Microsoft Passport Network プライバシーに関する声明](#)をお読みください。
- お客様のプライバシーに関するその他の対策について確認するには、[プライバシーに関する声明 \(全文\)](#) の「[お客様の個人情報の収集および使用](#)」を参照してください。
- お客様のコンピュータ、受信トレイ、個人情報、およびご家族とのオンラインコミュニケーションの保護に関する詳細については、「[オンラインの安全](#)」にアクセスしてください。

お問い合わせ先

プライバシー保護の実施内容に関する詳細については、「[MSN Web サイトのプライバシーに関する声明](#)」(全文) (http://privacy1.msn.com/jp/fullnotice_armv) にアクセスしてください。または、以下の宛先まで郵便でご連絡ください。

MSN Privacy
Microsoft Corporation
One Microsoft Way
Redmond, WA 98052
U.S.A.

インターネットでのお問い合わせは [こちら](#) から受け付けております。

家族のインターネット MSN プレミアムウェブサービス ご意見ご感想

12

IBM Slovenija [zamenjaj] | Pogoji uporabe

Domača stran | Proizvodi | Storitve & rešitve | Podpora & datoteke | Moje nastavitve

Zasebnost

IBM-ovi postopki za varovanje zasebnosti na spletu

Področje veljavnosti
Ta izjava se nanaša na spletna mesta IBM po vsem svetu.

Zasebnost
IBM-ov pravilnik o zasebnosti
Piškotki (Cookies)

Sorodne povezave
• TRUSTe

Osebne informacije

Na internetu nas lahko obiščete brez identifikacije ali podajanja osebnih informacij. Občasno pa bomo od vas morda zahtevali informacije, na primer: za obdelavo naročila, za odgovarjanje na vprašanja, za zagotavljanje naročnine ali v zvezi z vašo prošnjo za delovno mesto. Te informacije lahko dopolnimo za izvedbo transakcije ali za nudenje boljših storitev

Uporabe

- Za izpolnitev vaših zahtev z naše strani ali strani drugih, ki so vključeni v izpolnitev.
- Za stopanje v stik z vami za ankete o zadovoljstvu strank, za raziskovanje trga ali v povezavi z določenimi transakcijami.
- S strani IBM-a in izbranih organizacij za namene trženja, če ste tako uporabo dovolili.
- V nedoločljivi obliki za analizo (npr. podatki o poteku obiskov spletnih strani).
- Za razvoj našega poslovnega odnosa, če predstavljate IBM-ovega poslovnega partnerja ali prodajalca.

Vaše izbire

- Ko zbiramo vaše informacije, nam lahko poveste, da ne želite, da so le-te uporabljene za nadaljnje trženje, in vaše želje bomo upoštevali.
- V brskalniku lahko izklopite piškotke.

Pomembne informacije

IBM je član programa TRUSTe (www.truste.org). IBM upošteva določila okvirnega sporazuma Safe Harbor med EU in ZDA. Za popraviljanje nepravilnosti v IBM-ovem zapisu vaših osebnih informacij se obrnite na pošiljatelja ali IBM na access_request@us.ibm.com.

Za celotno IBM-ovo obvestilo si oglejte [IBM-ov pravilnik o zasebnosti](#).

Kako stopiti v stik z nami

Vprašanja o tej izjavi ali IBM-ovi obravnavi vaših informacij lahko pošljete na:
prvcy@us.ibm.com ali
Privacy, IBM, 1133 Westchester Avenue, White Plains, NY 10604 USA.

O IBM | Zasebnost | Stik

Portfolio of condensed notices

Lenovo (German)

The screenshot shows the Lenovo website's privacy policy page in German. The header includes the Lenovo logo, a search bar, and navigation links for 'Deutschland [ändern]', 'Nutzungsbedingungen', 'Home', 'Lenovo Store', 'Support & Downloads', and 'Mein Profil'. The main content is titled 'Datenschutz' (Data Protection) and includes a sub-header 'Umgang mit den Lenovo Datenschutzbestimmungen im Web'. A sidebar on the left contains links for 'Datenschutz', 'Datenschutz Details', and 'Cookies'. The main text is organized into several sections: 'Geltungsbereich' (Scope of Application), 'Persönliche Informationen' (Personal Information), 'Verwendung Ihrer Daten' (Use of Your Data), 'Ihre Auswahlmöglichkeiten' (Your Options), and 'Wichtige Informationen' (Important Information). A 'Kontakt' (Contact) section provides an email address and physical address. The footer contains links for 'Lenovo in Deutschland', 'Datenschutz', and 'Kontakt'.

Deutschland [ändern] | Nutzungsbedingungen

Home | **Lenovo** Store | Support & Downloads | Mein Profil

Datenschutz

Umgang mit den Lenovo Datenschutzbestimmungen im Web

Geltungsbereich
Diese Erklärung betrifft die Lenovo Websites weltweit.

Datenschutz
Datenschutz Details
Cookies

Persönliche Informationen
Im Normalfall können Sie unsere Internetseiten aufrufen, ohne irgendwelche Angaben über Ihre Person zu machen. In Einzelfällen benötigen wir jedoch Informationen von Ihnen, beispielsweise um mit Ihnen zu korrespondieren, um einen Auftrag auszuführen, um ein Abonnement abzuwickeln oder wenn Sie sich auf eine Stellenausschreibung bewerben. Gegebenenfalls beziehen wir Dritte ein, um eine Transaktion auszuführen oder um einen besseren Service anbieten zu können.

Verwendung Ihrer Daten

- Zum Ausführen Ihrer Anforderungen durch uns oder durch in die Auftragsabwicklung einbezogene Dritte.
- Um Sie im Rahmen einer Umfrage zur Kundenzufriedenheit oder für Marktforschungszwecke oder in Verbindung mit einer Transaktion zu kontaktieren.
- Für Marketingzwecke von Lenovo und ausgewählten Dritten, wenn Sie zugestimmt haben, dass Ihre Daten für derartige Zwecke verwendet werden dürfen
- Als anonyme Informationen zur Analyse (z. B. Click-Stream-Daten).
- Zum Ausbau der Geschäftsbeziehungen, wenn Sie ein Lenovo Business Partner oder Lieferant sind.

Ihre Auswahlmöglichkeiten

- Wenn wir Daten von Ihnen erfassen, können Sie uns auffordern, diese Daten nicht für weitere Marketingkontakte zu verwenden. Diesen Wunsch werden wir respektieren.
- Sie können die Cookies in Ihrem Browser deaktivieren.

Wichtige Informationen
Um falsche Angaben im Lenovo Datenschutz mit Ihren persönlichen Daten zu korrigieren, antworten Sie dem Absender
Die vollständige Lenovo Erklärung finden Sie unter [Lenovo Datenschutzbestimmungen](#)

Kontakt
Fragen zu dieser Erklärung oder zum Umgang von Lenovo mit Ihren Daten können an folgende Adresse geschickt werden:
Privacy, Lenovo
1133 Westchester Ave.
White Plains, NY 10604
privcy@us.lenovo.com

Lenovo in Deutschland | Datenschutz | Kontakt