

Effective Privacy Notices: The View from Communications Experts

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siegelgale

Bake the cake before you frost

- Focus has been on Wording and Design
- Process and Content have been neglected
 - Production methods and content need to be determined before writing and design begin
 - If not, the result is often visually uninviting and cumbersome documents

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share information about the other joint account holders. Choosing to opt out of this information sharing may limit opportunities for you to receive product and service information that may interest you.

Information Sharing Outside the Bank Family and Your Opportunity to "Opt Out"

We may share any of the personal information that we collect about you with companies or other organizations outside of the Bank family, including:

- financial service providers, such as mortgage bankers, securities broker-dealers and insurance agents;
- non-financial companies, such as retailers, direct marketers, membership clubs and publishers; and
- other companies and organizations, such as non-profit organizations.

If you prefer that we not share personal information about you with companies and organizations outside the Bank family (except information described below under "Other Information Sharing"), you may opt out; that is, you may direct us not to share this information by calling us toll-free at 1-888-888-8888.

If you choose to opt out of the sharing of personal information with companies and organizations outside of the Bank family, we will not share any personal information about you for any accounts or loans that you may have with us. For any accounts or loans that you hold jointly with another person, each person may separately opt out and joint account holders may opt out for each other. If only one joint account holder opts out, we may share information about the other joint account holders. Choosing to opt out of this information sharing may limit opportunities for you to receive product and service information that may interest you.

Other Information Sharing.

We may also share personal information about you with companies or other organizations outside of the Bank family as required by or permitted by law. For example, we may share personal information to:

- protect against fraud;
- respond to a subpoena; or
- service your account.

In addition, the Bank may work with companies or organizations outside of the Bank family to provide services to us or to provide you with opportunities

Dear Customer:

Customer ID# 00200200

The subject of privacy is receiving considerable public attention. New federal laws have been passed to help you understand how banks, credit card companies and other financial service providers use and protect customer information. In response, our bank would like you to know what our corporate Privacy Policy is and how we protect information about you. Please note that our bank is a member of the Bank group family of companies. We issue credit cards on behalf of other financial institutions, and that is why you are receiving this Consumer Information Values and Privacy Policy. Our Policy applies to the ways in which we provide service to you, how you interact with us online, and our agreements with suppliers and partners.

Four key values form the foundation of our Privacy Policy:

- 1. Information security is a priority.** One of our highest priorities is information security. We regularly review our security standards and practices to protect against unauthorized access to information.
- 2. Privacy is a shared responsibility.** You trust us to care for your financial needs, and you have a right to feel confident that we are responsibly managing your account and other information about you. At the same time, there are things you can do to help protect your privacy, such as knowing what information is on your credit report, understanding the choices you have about the use of your information, and protecting your passwords.
- 3. Responsible use of information is beneficial.** Information is important for meeting your needs and providing consistent service quality. Information is also the source of new ideas. The more we understand about you and your needs, the better we can suggest products and services, create new opportunities for you, and help you manage your financial assets.
- 4. Information flow and privacy are a balance.** We must meet expectations for privacy while still managing information to conduct our business and serve you. Information must be shared to fulfill your

Multiple Forms of Analysis

- Audience analysis
 - Reflect real-world attention spans, variety of segments, likely concerns
- Business requirements analysis
 - Budget, timing, goals for measuring success
- Production analysis
 - Production method should be selected to meet audience needs

Consider audience segments

- Consider the diversity of your audience
 - Multiple languages
 - Multiple accounts
 - Joint account holders
- Does one message fit all?

Consider multiple languages

- Reach all populations by sending the notice in whatever languages customers have selected for other regular communications

Atención clientes hispanoparlantes: Esta Declaración Sobre la Privacidad proporciona información sobre cómo manejamos información personal no publica acerca de nuestros clientes, las circunstancias bajo las cuales podemos compartir tal información con otras personas, y cómo usted puede pedir que no compartamos esa información con terceros que no sean afiliados nuestros. Si quisiera que le proporcionemos una traducción al español de la Declaración Sobre la Privacidad en su totalidad, sirvase comunicarse con nosotros escribiendo a HRS USA, PO Box 15521, Wilmington, DE 19850-5521 o llamándonos gratis al 1-800-899-8131.

*Household Insurance Group, Inc. includes Household Life Insurance Company, Wesco Insurance Company, Service General Insurance Company, First Central National Life Insurance Company of New York, Household Life Insurance of Delaware and such other companies Household Insurance Group may subsequently acquire. The Assurant Group includes American Reliable Insurance Company, American Bankers Insurance Company of Florida, American Bankers Life Assurance Company of Florida, Financial Insurance Exchange, Bankers American Life Assurance Company and Union Security Life Insurance Company.

Business requirements

- Need representation from several internal sources to ensure quality communication:
 - Legal/regulatory
 - Corporate communications
 - Database systems
 - Printing and distribution

Roles of internal groups

- Regulatory affairs – ensure compliance
- Corporate communications – determine tone, writing style, format and design
- Database systems – facilitate customization
- Printing and distribution – ensure feasibility of production

Production and distribution

- What method of production and distribution will be used?
- What quantities will be needed?
- The answers will greatly affect the ability to customize content, use color, determine size and shape, etc.



CUSTOMER NAME
10960 BIRCHWOOD AVE
NYACK, NY 20260-1410

Important Notice

How We Use and Protect Your Personal Information

Dear Valued Customer:

We share your concerns about privacy. We understand you want to know how we treat the personal information that we obtain from you or other sources in the course of providing you with products and services. As our customer, you may be wondering . . .

- What do we do with the personal information we have about you?
- What kind of personal information do we have, and where did we get it?
- How do we protect that information?
- How can you find out what information we have about you?

We hope this notice will help answer those questions. We want you to know—whether you're doing business with us through your local agent, our Customer Information Center, or weburl.com—that we respect the privacy of our customers.

What do we do with the personal information we have collected about you?

We do not disclose any of your personal information, or your medical information, to companies or organizations not affiliated with us that would use the information we have provided them to contact you about their own products and services.

Your agent or broker may use your personal information in his or her files for marketing purposes or to help you with your overall insurance program. We may also use your personal information to communicate with you about products, features, and options you have expressed an interest in or that we believe may be of interest to you. In addition, we may, as permitted by law and without your prior permission, provide personal information about you contained in our records or files to persons or organizations such as:

- persons who perform a business function for us,
- your agent or broker,
- insurance support organizations,
- other insurance companies in order to perform their role in an insurance transaction involving you,
- independent claim adjusters,
- businesses with whom we have a marketing agreement,
- businesses that conduct actuarial or research studies,
- regulatory or law-enforcement authorities,
- our affiliated companies,
- persons requesting information pursuant to subpoena or court order, and
- repair shops and recommended vendors.

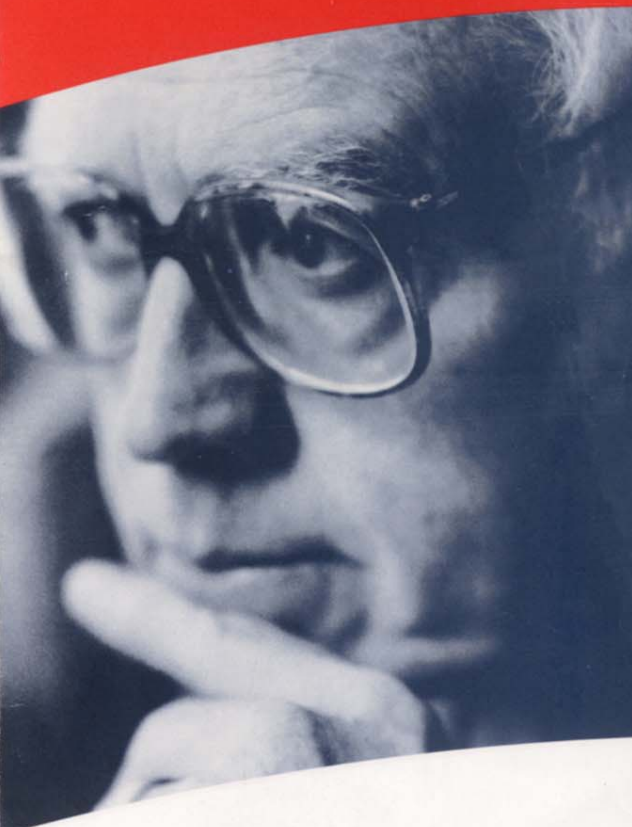
What kind of personal information do we have, and where did we get it?

Much of the personal information that we have about you comes directly from you. You disclosed much of this information to us on your application or request for insurance or other products we offer. We may contact you by telephone or mail for additional information. We also keep information about the types of products and services you purchase from us, as well as account balances and payment history.

Depending on the nature of the transaction you are completing with us, you may be required to provide us, our affiliates, agencies, or other entities working on our behalf with information. That information may include, for example, your name, address, birthdate, phone number, health information, E-mail address, the types and numbers of the policies you hold, mother's maiden name, Social Security number, credit card information, driver's license number, accident/violation history, information about vehicle operators, mortgages, lien/lease holders, or vehicle information. We may also collect information from our website such as your activity while using our site and information from online collecting devices known as "cookies" (for more information, see our online Privacy Statement at weburl.com).

Privacy Policy for Consumers

How we protect and use information



What you should know.

We recognize our obligation to keep information about you secure and confidential. It's important for you to know that, unlike many other financial institutions, we do not sell or share Customer Information with marketers outside the Bank Company family of companies. So, there is no need for you to tell us not to. Plus, all of our customers are given the opportunity to tell us they don't want to receive direct marketing offers from us. You also need to know that we carefully manage information among our family of companies to give you better service, more convenience, and to offer benefits based on your overall business with us.

This policy covers Customer Information, which means personally identifiable information about a consumer or a consumer's current or former relationship with our Company. This policy is provided to you as required by the Federal Financial Privacy Law.

PROTECTING INFORMATION ABOUT YOU FROM MARKETERS OUTSIDE THE BANK COMPANY FAMILY.

Our company does not sell or otherwise share any Customer Information with marketers outside the Bank Company family offering their products and services. *You don't need to take any action to prevent disclosure.* While we may offer products and services on behalf of outside companies, our company and companies that work for us control the information used to make those offers. However, you can control the offers we may extend to you. Please refer to the section *Honoring Your Preferences*.

MAKING THE SECURITY OF INFORMATION A PRIORITY.

Keeping financial information secure is one of our most important responsibilities. We value your trust and handle information about you with care. We limit access to Customer Information to those associates who need to know that information to provide products and services to you or to maintain or service those products or services. Our associates are bound by a code of ethics requiring confidential treatment of Customer Information and are subject to disciplinary action if they fail to follow this code.

We maintain physical, electronic and procedural safeguards to protect Customer Information. We continually assess new technology for protecting information and upgrade our systems when appropriate.

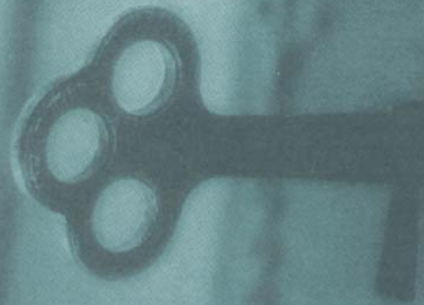
COLLECTING INFORMATION.

We collect and use various types of information to service your accounts, save you time and money and better understand your needs. We want to help you learn more about products and services that may be of interest to you.

Customer Information we collect is categorized as the following five types:

- 1 Information you provide to us on applications and through other means, such as your assets, income and other debt.

IMPORTANT
INFORMATION
ABOUT YOUR
PRIVACY



Production affects format, which affects readability

- A multi-page brochure with fold-out pages doesn't look simple and won't be read
- Brevity ensures longevity of attention span
- Keep all pages oriented in the same direction

Database systems

- Use what you already know about customers
 - Customize content
 - Anticipate questions
 - Head off unnecessary inquiries

Customize content

- Instill rather than undermine confidence

"If you are also a customer of one of our affiliates, and you receive a notice that it may share information about you with its affiliates, you will need to separately notify that affiliate if you do not want such information shared."

- How confident will the reader be if it sounds as though the company can't keep track of its customers?

Personalize content

- Address the person by name and include the account numbers you are using as the reason for contacting them
- Have a corporate executive sign the letter – computers don't value the concept of privacy, people do
 - Only a third of the sampling of notices I reviewed included a signature

Richard Cummins

Anticipate

- Anticipate reader's questions:
 - What personal information does the company know about me?
 - Is it accurate?
 - How did they get this information?

Process

- For example, be clear about whether opt-out requests apply to everyone on a joint account

An opt-out request by any party on a joint account will apply to all parties on the joint account. Opt-out requests will not apply to information sharing that is permitted by law. Please allow sufficient time for us to process your request.

Process

- A simplified process is easier to describe.
 - Let people call rather than write
 - Make it easy for people to find out how to contact you; put phone numbers and Web site info right up front
 - Consolidate your mailings

Anticipate the future

- Consider how the first notification will differ from subsequent, annual notices

Content

- Set context
 - Remember that the notice was not requested; from the reader's point of view it just appeared
 - Privacy is an emotional concept; respect the reader's feelings

Content

- Consider providing extra, helpful content
 - Marketing List opt-out and Identity Theft information is useful

Tips to Help You Protect Your Privacy

Marketing Lists:

You may limit the marketing material you receive through the mail, by telephone or by e-mail. If you would like to reduce the amount of advertising you receive from other companies, write to the Direct Marketing Association at the appropriate address listed below. You must provide your name, address and telephone number with your request:

Mail Preference Service
c/o Direct Marketing Assn.
P.O. Box 9008
Farmingdale, NY 11735-9008

Telephone Preference Service
c/o Direct Marketing Assn.
P.O. Box 9014
Farmingdale, NY 11735-9014

E-Mail Preference Service
www.e-mps.org

Identity Theft:

If someone has used your personal identification to fraudulently establish credit, report the incident as quickly as possible to each of the credit reporting agencies and request that a fraud alert be placed on your file.

Experian	888-397-3742
Equifax	800-525-6285
Trans Union	800-680-7289

Obtain a copy of your credit report from each of the credit reporting agencies. Check to see whether any additional accounts were opened without your consent or whether unauthorized charges were billed to your accounts. To request copies of your credit reports call:

Experian	888-397-3742
Equifax	800-685-1111
Trans Union	800-916-8800

Content

- Remove introductory barriers

“We at Megalopoly Insurance (which includes MegaMegalopoly Insurance Co., The Megalopoly Indemnity Co., Mega Life Insurance Co., and our affiliated mini-insurance companies and subsidiaries managed by Megalopoly Insurance)...”

- A better approach is to list the companies that are included at the end of the privacy notice.

***Thank you for choosing Crosscountry
We look forward to building a lifetime relationship with you.***

Crosscountry Mutual Insurance Company

Crosscountry Mutual Fire Insurance Company

Crosscountry Property and Casualty Insurance Company

Crosscountry General Insurance Company

Crosscountry Insurance Company of Florida

Crosscountry Lloyds

Colonial Crosscountry Mutual Insurance Company

Crosscountry Assurance Company

Crosscountry

Summary

- Don't concentrate on simplifying the description of a process; simplify the process itself
- Explore production methods early on
- Use database knowledge to personalize
- Consider economies and customization potential of laser printing

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