



**Homeland
Security**

The following document was received by the DHS Privacy Office as part of the Privacy Office Workshop Series.

For more information please visit the website at www.dhs.gov/privacy.

Additional Contact Information:

The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Telephone: 571.227.3813
Fax: 571.227.4171
Email: privacy@dhs.gov
Email: privacycommittee@dhs.gov

Layering Notices: Communications and Accountability

Marty Abrams

Center for Information Policy Leadership

April 5, 2006

- Societies are always looking for the balance between public observation and an individual's right to solitude
- Transparency plays a key role in assuring that balance
- Effective notices are a key aspect of transparency

- Formed in 2001 to respond to public dismay with private sector notices
- Created the concept of multilayered notices
- Worked with many parties to create an international transparency norm

Privacy Notices Have Two Purposes

- Define in great detail
 - What is being collected
 - For what purpose
 - By whom
 - Under what conditions
- Give individuals the information they need in an understandable fashion so they may participate in the process
- Achieving both objectives at the same time is difficult

→ Layering

- Notices need to be complete and very easy to understand
- Very long complex notices are complete, but not easy to understand
- Brief notices may be easy to understand, but won't capture all the detail
- Multilayered notices offers a system of notices that are responsive to legal requirements and individual needs

- Objective: Assure privacy notices are easy to understand, compare and complete
- Achieved by communicating a privacy notice in layers
 - Very short three line notice where space is very limited
 - Condensed notice in a common template for most consumers facing interfaces
 - Complete notice on request

- Individual comprehension requires
 - Notices must be relatively short
 - No more than seven topics
 - They must be in plain language
 - No jargon
 - They must be in a common format that makes it easy for the consumer to understand and compare

- Common template with six critical elements
 1. The party covered by the notice
 2. Data collected from and about the consumer
 3. Uses (purposes) and sharing
 4. Individual choices and how to make them
 5. Other, important information
 6. How to contact the organization



P&G Privacy Notice

Scope

This statement applies to websites operated by or on behalf of **The Procter & Gamble Company and its affiliated companies and subsidiaries (P&G)**.

Personal Information

information

[Click here](#) for more

- We collect information you choose to provide such as your email or postal address.
- We collect non-personal information such as browser type, operating system, and web pages visited to help manage our websites.
- We use cookies and other internet technologies to manage our website and e-mail programs. We do not use these technologies to collect or store personal information.
- We may obtain additional information about you, such as demographic information, from commercially available sources.

Uses

information

[Click here](#) for more

- We use personal information to provide you information and samples you request, to give you a customized interactive experience, 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 use personal information you provide only for purposes consistent with the reason you provided it.
- When we temporarily provide personal information to companies who 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 P&G. These service companies cannot use your personal information for any other purpose than the reason you provided it to P&G.

Your Rights & Choices

[Click here](#) for more information

- You have the right to have a copy of the personal information you provide, and to correct or update your personal information.
- You may instruct P&G to remove you from our programs you have subscribed to by using the unsubscribe link provided in our email programs, or using the link provided below
- You may instruct P&G to remove any previous consent you provided to share your personal information with other companies.
- [Click here](#) to select your country and be linked to the correct address to use to: obtain a copy of the personal information you provided, be removed from our programs, or remove your consent for information sharing.

How to Contact Us

- To contact us with a question [click here](#) (for country specific addresses)
Or write to us at:
P&G Privacy Team
2 P&G Plaza
Cincinnati, OH 45202 U.S.A.
- To read our full Online Privacy Statement [click here](#):
- To read our Global Privacy Policy [click here](#)

Important Information

- P&G is committed to working with consumers to obtain a fair resolution of any complaint or concern about privacy.
- P&G complies with country data protection laws.
- We cooperate with country data protection authorities if they believe a privacy problem has occurred.
- Our U.S. websites are privacy certified by the U.S. [Better Business Bureau OnLine OnLine](#)® Privacy Seal.



宝洁公司隐私权声明

范围

本声明适用于由宝洁公司及其附属公司和子公司直接或委托运营的网站。

个人信息

如欲了解详情，请[单击此处](#)

- 我方收集您所选择提供的个人信息，例如您的电子邮件或邮政地址等。
- 我方还收集非个人信息，如浏览器类型、操作系统以及您访问过的网站页面等，以帮助我方管理网站。
- 此外，我方还通过 cookies 以及其它互联网技术管理我们的网站和电子邮件活动。此技术不会被用于收集或保存个人信息。
- 我方也可能通过可用的商业性渠道获得您的其它信息，如地理位置等。

使用

如欲了解详情，请[单击此处](#)

- 我方使用个人信息为您提供您所要求的信息和样品，带给您自订制的互动式体验，并协助我方开发新的产品和服务以满足您的需求。
- 除非我方已经向您提出请求并征得您的明确同意，否则我方不会将您的个人信息提供给其它商家。如果您不同意，我方将不会与他人共享您的个人信息。
- 我方仅将您提供的个人信息用于与您提供信息原因一致的目的。
- 如果我方暂时将您的个人信息提供给为我方服务的公司，诸如向您发送电子邮件或递送样品的公司，我方将要求这些公司采取与宝洁同样的方式保护您的个人信息。这些服务公司不会将您的个人信息用于与您提供信息原因不符的其它目的。

您的权利与选择

如欲了解详情，请[单击此处](#)

- 您有权拥有您所提供的个人信息的一份副本，有权更改或更新您的个人信息。
- 您可以通知宝洁公司取消您对宝洁与其它商家共享您的个人信息而做出的同意。
- 我们的美国网站已获得美国 [Better Business Bureau \(商业服务监督局\)](#) [OnLine](#)® 隐私权认证。

- 请[单击此处](#)选择您所在的国家，然后进入新的链接地址，您可以在其中：获得您提供的个人信息的一份副本，取消您对个人信息共享的同意或订制的活动。

重要信息

- 宝洁公司承诺同消费者一起努力公正地解决有关隐私权的任何投诉和质疑。
- 宝洁公司遵守国家数据保护法律。
- 如果国家数据保护机构确信我方存在隐私权的问题，我方将与其进行合作解决问题。

如何联系我们

- 如果您有任何疑问，请[单击此处](#)（获得所在国家的地址）联系我们，或写信至：

- 要阅读我们完整的“在线隐私权声明”，请[单击此处](#)；
- 我们的“全球隐私权政策”提供了有关我方如何保护其它类型的个人信息（如雇员或职位申请人等）的信息。要阅读我们完整的“全球隐私权政策”，请[单击此处](#)。

- Governments need to communicate their collection and use practices
- Detail is still needed for accountability purposes
- Layered notices work for this purpose
- The additional cost is minimal



Australian Government

Privacy Notice Highlights

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](http://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](#).



Privacy Notice Highlights

▶ Scope

This statement applies to USPS™ customers and usps.com visitors, unless a separate privacy notice is prominently displayed.

[View the Full Privacy Policy](#)

▶ Personal Information

- We [collect](#) personal information directly from you and your transactions with us. We also occasionally obtain information about you from verification services and commercial sources, such as to acquire permission-based marketing lists.

▶ Uses

- We use your information to provide you USPS products and services, or respond to your inquiries.
- We [do not sell](#) customer or mailing lists to outside parties, including marketers.
- We protect your information under the [Privacy Act](#). We only share your information in the following limited situations: to a congressional office on your behalf; to financial entities regarding financial transaction issues; to a USPS auditor; to entities, including law enforcement, as required by law or in legal proceedings; to customs agencies relating to outgoing international mail; to contractors and other entities to fulfill your product or service; or with your consent

▶ Your Choices

- We only market other USPS products/services to you with your consent, based on your [marketing preferences](#).
- You may create or change your preferences by accessing your account on usps.com and editing your profile.

▶ Important Information

You may [access information](#) we maintain about you by contacting the program office for the product/service you ordered, or by contacting the privacy office at the addresses provided.

▶ How to Contact Us

- We welcome you to view our full [privacy policy](#).
- You may [contact](#) the privacy office at privacy@usps.gov or USPS, Privacy Office, 475 L'Enfant Plaza SW Washington, DC 20260-2200.

New Zealand Privacy Commissioner's Notice

Office of the Privacy Commissioner Website Privacy Notice

Scope:

This privacy notice applies to personal information collected on the New Zealand Privacy Commissioner's website:
www.privacy.org.nz

Personal Information:

- We do not collect personal information on this site unless you volunteer it.
- There are several places on the site where you may volunteer personal information to us: joining the mailing list for *Private Word* or other publications, using the feedback button, emailing us an enquiry or complaint, making a submission on a proposed code of practice or other public consultation. You can also print out a form for registering for a training workshop (but will need to post or fax it to us).
- We do not collect identifiable information about you if you only browse our website.

Use and disclosure:

- We only use personal information that you provide to us through this site for the purposes you supplied it, for directly related purposes or for other reasons permitted under the Privacy Act 1993.
- We do not share personal information volunteered to us through this site with others unless this is necessary for the purpose for which it is provided (e.g. to seek an answer to a complaint from a person complained about) or required by law.
- We may make information about submissions made to us in public consultation processes available publicly either by publishing the submissions or in response to requests under the Official Information Act 1982.
- We may analyse non-identifiable web traffic data to improve our services.

Your Rights and Choices:

- You may seek access to personal information held about you by the Office of the Privacy Commissioner in accordance with your rights under the Privacy Act. You have the right to ask to have information corrected or deleted. To protect your privacy, and that of others, we may ask you to verify your identity as part of dealing with an access or correction request.
- You can ask to be removed from the *Private Word* or other mailing list.
- Information provided will be held by the Office of the Commissioner.

Important Information:

Further explanation of the purpose for which information may be needed, and how it will be handled, is provided at the parts of the site at which you can volunteer information (such as the mailing list and feedback form, workshop registration brochure, and notice concerning public consultations on codes of practice).

How to contact us:

Office of the Privacy Commissioner:

- Email: enquiries@privacy.org.nz
- Auckland Office, PO Box 466 (tel 09-302 8680, fax 09-302 2305)
- Wellington Office, PO Box 10-094 (tel 04-474 7595, fax 04-474 7595)
- Privacy enquiries 0800 803 909 (in Auckland 302 8652)



OFFICE OF THE INFORMATION & PRIVACY COMMISSIONER
FOR BRITISH COLUMBIA

Website Policy

Scope

This notice applies to our website.

Personal Information

We only collect personal information that you choose to give us (for example, your email address when you email us at info@oipbc.bc.ca).

We do not collect your personal information if you browse or download from our website. Some information, such as your Internet domain name or IP address, may identify you. The extent of personal identification depends, in large part, on the "naming standards" followed by your Internet service provider. You may wish to check their policies and practices in this regard. To the extent that our web server may collect personal information, that information is used only for the operation and security of our website.

Uses

If you choose to give us personal information, we only use it for the purposes for which you give it to us.

We do not share your personal information with government agencies or other organizations without your permission unless:

- it is necessary to provide you with a service that you have requested;
- it is required or authorized by law; or
- compelling circumstances exist that affect anyone's health or safety.

We may analyze non-identifiable web site traffic data to improve our services. We do not use cookies or web bugs. We do not track use of our website.

Your choices

You can choose whether to give us personal information, as noted above.

Important Information

This website is covered by the *Freedom of Information & Protection of Privacy Act*. Although we try to see that all information posted on our website is accurate and complete, we do not represent that it is so, or guarantee it, and accept no liability or obligation for accuracy or completeness. If there is any discrepancy between information posted on our website and the original paper version, the paper original is the authoritative version.

How to contact us

Contact us at info@oipbc.bc.ca about any of your privacy concerns or to suggest further improvements to this website.

Alternatively, you can write to us at:

Office of the Information & Privacy Commissioner for BC
P.O. Box 9038, Stn. Prov. Govt.
Victoria, BC V8W 9A4

Compliance Issues Are Not New

- GLBA, HIPAA and various data protection laws are complex
- Enforcement authorities have recognized completeness based on the entire package

"Ten Step Guide To Develop a Multilayered Privacy Notice"

1. Map data process
2. Review laws
3. Write internal policy
4. Translate internal policies into complete external policy
5. Test the language
6. Capture the key elements in condensed notice
7. Harmonize the complete and condensed notice
8. If the organization collects data via PDAs develop short notice
9. Conduct final test
10. Publish