

Using the P3P Vocabulary in Data Transfer

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Although P3P was originally envisioned as a tool to facilitate privacy interactions between an individual and a Web site, there was a realization early in the process that P3P could be used to document privacy policies and help empower users in the onward transfer of personal information. This could happen in various ways, for example each field of data could retain an attached P3P policy or an entire database could have a single policy associated with all of the fields contained within it. The ability to use P3P or similar privacy language in this way is central to verifying user consent and will aid organizations in auditing use of personal information.

History¹

The first drafts of the P3P spec attempted to take on the standardization of data transfer. Yet in September 1999, the P3P spec group realized that the data transfer mechanism in P3P was unlikely to be used. At that time, implementers were building proprietary systems and seemed unlikely to adopt the data transfer mechanism in P3P. Also, the P3P specification was already three years in development at that point and was becoming too complex. Removing data transfer certainly helped P3P become a final recommendation, but the benefits of using P3P tags to ensure onward data protection still exist and are under examination by companies, organizations and standards setting bodies.

Implementation and Suggested Interaction Plan

Today, there are several XML-based specifications that are looking into utilizing data transfer capabilities. Some of these groups have actively looked into use of the current P3P vocabulary for this purpose. Others do not seem to know about the potential benefits involved or have expressed interest in creating a separate privacy rights language.

I would like to suggest that the P3P working group make a concerted effort to reach out to relevant working groups and beyond — specifically the other W3C working groups, IETF, OASIS, the Liberty Alliance, and others to get their feedback on the use of the P3P vocabulary for data transfer. Based on this feedback, the P3P working group could update the P3P vocabulary for this purpose.

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¹ Daniel LaLiberte at the W3C drafted “Removing Data Transfer from P3P” <<http://www.w3.org/P3P/data-transfer.html>> at the time that it was removed offering a more complete history.