

# Standardised Privacy Policies: A Post-mortem and Promising Developments

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Reuben Binns  
[r@reubenbinns.com](mailto:r@reubenbinns.com)  
@RDBinns



## Privacy Policy

### Self Regulatory Frameworks

### Key terms

### Features

### Updates

## Privacy Policy

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#### How we use information we collect

#### Transparency and choice

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Last modified: March 21, 2014 (view archived version)

Hide examples

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There are many different ways you can use our services – to search for and share information, to communicate with other people or to create new content. When you share information with us, for example by creating a [Google Account](#), we can make these services even better – to share your [own relevant search results](#) and ads, to help you [connect with people](#) or to make [sharing with others a quicker and easier](#) . As you use our services, we want you to be clear how we're using information and the ways in which you can protect your privacy.

Our Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- The choices we offer, including how to access and update information.

We've tried to keep it as simple as possible, but if you're not familiar with terms like cookies, IP addresses, pixel tags and beacons, then read about these [key terms](#) first. Your privacy matters to Google so whether you are new to Google or a long-time user, please do take the time to get to know our products – and if you have any questions, [contact this page](#).

### Information we collect

We collect information to provide better services to all of our users – from figuring out basic stuff like which language you speak, to more complex things like which [ads you'll find most useful](#) or the [people who matter most to you online](#).

We collect information in two ways:

- Info we gather you give us.** For example, many of our services require you to sign up for a [Google Account](#). When you do, we'll ask for [personal information](#), like your name, email address, telephone number or [social media](#). If you want to take full advantage of the sharing features we offer, we might also ask you to create a publicly visible [Google Profile](#), which may include your name and photo.

- Info we gather we get from your use of our services.** We may collect [info we gather](#) about the services that you use and how you use them, like when you visit a website that uses our advertising services or you [view and interact with our ads](#) and content. This information includes:

#### Device information

We may collect [device-specific info we gather](#) (such as your hardware model, operating system version, unique device identifiers, and mobile network information including phone number). Google may associate your [device identifier](#) or [phone number](#) with your [Google Account](#).

#### Log information

When you use our services or view content provided by Google, we may automatically collect and store certain information in [server logs](#). This may include:

- Details of how you used our service, such as your search queries.
- Telephone log information like your phone number, calling party number, forwarding number, time and date of calls, duration of calls, SMS, sending information and types of calls.
- Internet protocol address.
- Device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and related URL.
- Cookies that may uniquely identify your browser or your [Google Account](#).

#### Location information

When you use a location-enabled Google service, we may collect and [store some info we gather about your actual location](#), like GPS signals sent by a mobile device. We may also use various technologies to determine location, such as sensor data from your device that may, for example, provide information on nearby WLAN access points and cell towers.

#### Unique application numbers

Certain services include a unique application number. This number and information about your installation (for example, the operating system type and application version number) may be sent to Google when you install or uninstall that service or when that service periodically contacts our servers, such as for automatic updates.

#### Local storage

We may collect and store information (including personal information) locally on your device using mechanisms such as [browser web storage](#) (including HTML5) and application data caches.

#### Cookies and anonymous identifiers

We and our partners use various technologies to collect and store information when you visit a Google service, and this may include sending one or more [cookies](#) or [anonymous identifiers](#) to your device. We also use cookies and anonymous identifiers when you interact with services we offer to our partners, such as [other things we view](#) or Google features that may appear on other sites.

### How we use information we collect

We use the information we collect from all of our services to provide, maintain, protect and improve them, to [develop new ones](#), and to [provide Google and our users](#) . We also use this information to offer you tailored content – like giving you more relevant search results and ads.

We may use the name you provide for your [Google Profile](#) across all of the services we offer that require a [Google Account](#). In addition, we may replace your name associated with your [Google Account](#) so that you are represented consistently across all our services. If other users already have your email, or other information that identifies you, we may show them your publicly visible [Google Profile](#) information, such as your name and photo.

When you contact Google, we may keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming changes or improvements.

We use information collected from cookies and other technologies, like [pixel tags](#), to [help you see your experience](#) and the overall quality of our services. For example, by saving your language preferences, we'll be able to have our services appear in the language you prefer. When viewing you tailored ads, we will not associate a cookie or anonymous identifier with [variable categories](#), such as those based on race, religion, sexual orientation or health.

We may [work with you to control info we gather](#) from one site or view with [info we gather](#), including [personal info we gather](#), from other [Google services](#) – for example to [make it easier](#) to share a [thing with people you know](#). We will not combine DoubleClick cookie information with personally identifiable information unless we have your opt-in consent.

We will ask for your consent before using information for a purpose other than those that are set out in this Privacy Policy.

Google processes personal information on our servers in many countries around the world. We may process your personal information on a server located outside the country where you live.

### Transparency and choice

People have different privacy concerns. Our goal is to be clear about what information we collect, so that you can make meaningful choices about how it is used. For example, you can:

- [Review and control](#) certain types of information tied to your [Google Account](#) by using [Google Dashboard](#).
- [View and edit](#) your preferences about the ads shown to you on Google and across the web, such as which categories might interest you, using [Ads Settings](#). You can also opt out of certain Google advertising services here.
- [Use our tools](#) to view and adjust how your [Google Profile](#) appears to particular individuals.
- [Control](#) who you share information with.
- [Take information](#) out of many of our services.

You may also opt your browser to block all cookies, including cookies associated with our services, or to indicate when a cookie is being set by us. However, it's important to remember that many of our services [may not function properly](#) if your cookies are disabled. For example, we may not remember your language preferences.

### Information you share

Many of our services let you share information with others. Remember that when you share information publicly, it may be [indexable by search engines](#), including Google. Our services provide you with different options on [sharing and removing your content](#).

### Accounting and updating your personal information

Whenever you use our services, we aim to provide you with [access to your personal info we gather](#). If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. When updating your personal information, we may ask you to verify your identity before we can act on your request.

We may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing product), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup systems).

When we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort. We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems.

### Information we share

We do not share personal information with companies, organizations and individuals outside of Google unless one of the following circumstances apply:

#### With your consent

We will share personal information with companies, organizations or individuals outside of Google when we have your consent to do so. We require opt-in consent for the sharing of any [variable personal information](#).

#### With domain administrators

If your [Google Account](#) is managed for you by a [domain administrator](#) (for example, for [Google Apps users](#)) then your domain administrator and members they provide case support to your organization will have access to your [Google Account information](#) (including your email and other data). Your domain administrator may be able to:

- view statistics regarding your account, like statistics regarding applications you install.
- change your account password.
- suspend or terminate your account access.
- access or retain information stored as part of your account.
- receive your account information in order to satisfy applicable law, regulation, legal process or enforce rights, [privacy controls](#) or respond
- restrict your ability to delete or edit information or privacy settings.

Please refer to your domain administrator's privacy policy for more information.

#### For internal processing

We provide personal information to our [affiliates](#) or other related businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

#### For legal reasons

We will share personal information with companies, organizations or individuals outside of Google if we have a [good faith belief](#) that access, use, preservation or disclosure of the information is [materially necessary](#) to:

- meet any applicable law, regulation, legal process or enforceable governmental request.
- enforce applicable Terms of Service, including investigation of potential violations.
- detect, prevent, or otherwise address fraud, security or technical issues.
- protect against harm to the rights, property or safety of Google, our users or the public as required or permitted by law.

We may share [aggregated, non-personally identifiable information](#) publicly and with our partners – like publishers, advertisers or connected sites. For example, we may share information publicly to [show trends](#) about the general use of our services.

If Google is involved in a merger, acquisition or asset sale, we will continue to assure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

### Information security

We work hard to protect Google and our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold in custody.

- We encrypt many of our services using SSL.
- We offer you two-step verification when you access your [Google Account](#), and a [Safe Browsing feature](#) in [Google Chrome](#).
- We secure our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We restrict access to personal information to Google employees, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

### When this Privacy Policy applies

Our Privacy Policy applies to all of the services offered by Google Inc. and its affiliates, including services offered on other sites (such as our advertising services), but excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you in search results, sites that may include Google services, or other sites linked from our services. Our Privacy Policy does not cover the information practices of other companies and organizations who administer our services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

### Compliance and cooperation with regulatory authorities

We regularly review our compliance with our Privacy Policy. We also adhere to several [self regulatory frameworks](#). When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

### Changes

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes). We will also keep your reviews of this Privacy Policy in an archive for your review.

### Specific product practices

The following notices explain specific privacy practices with respect to certain Google products and services that you may use:

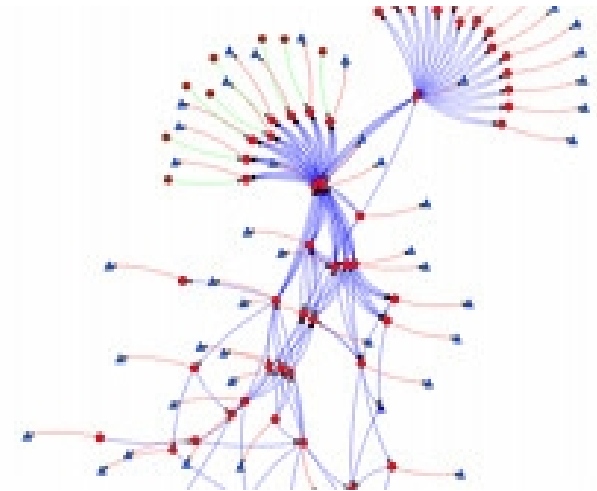
- [Chrome and Chrome OS](#)

# Incentives

- Creating a standard is costly
- Adopting a standard is costly
- Extra scrutiny = loss of reputation

# Network Effects

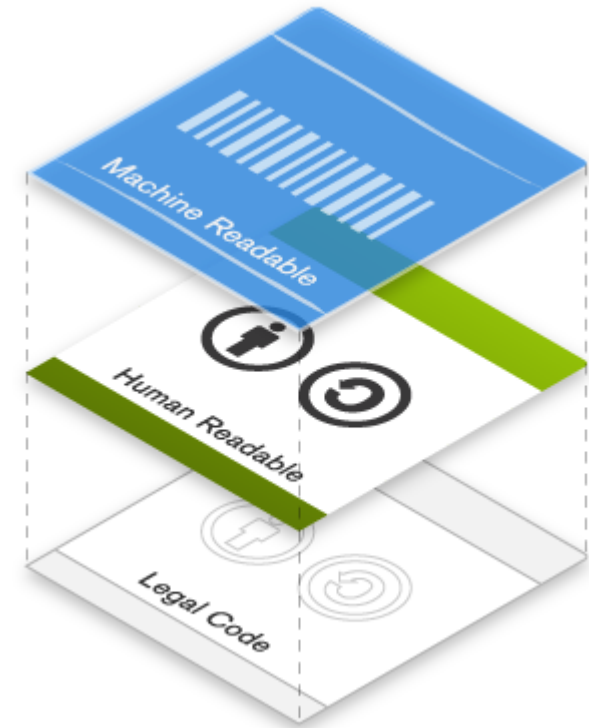
- Collective action problem
- Unilateral effort from multiple stakeholders: organisations, browsers, intermediaries, users
- Too many standards dilute efforts.



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# Legalese -> human -> machine

- Loss, addition or mutation of meaning
- Questionable legal standing
- Requires combination of skills from radically different domains



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# “Wouldn't it be great if we had standardised templates for privacy policies?”

Platform for Privacy Preferences <http://www.w3c.org/P3P> (1997 – 4 years before CC!)

Mozilla Privacy Icons <http://www.azarask.in/blog/post/privacy> (2010)

Privacy simplified <http://yale.edu/self/psindex.html> (2012)

Privacy commons <http://www.privacycommons.org> (2009)

Khula project <http://www.khulaproject.com/> (2011)

Open Digital <http://blog.opendigital.org/2012/03/identonomics> (2012)

Know privacy <http://www.knowprivacy.org> (2009)

Netzpolitik (2007)

European privacy open space <http://www.privacyos.eu> (2009)

Privacy Icons (for email) <http://privicons.org/> (2011)

Clearware <http://www.clearware.org> (2006)

Privacy labels <http://cups.cs.cmu.edu/privacyLabel/> (2010)

Internet Governance Forum <http://identityproject.lse.ac.uk/mary.pdf> (2006)

I agree to <http://www.iagreeo.org> (2011)

Standard Label <http://standardlabel.org/> (2012)

OwnTerms <http://ownterms.pbworks.com/w/page/6985495/FrontPage> (2009)

Lex publica <http://lexpubli.ca/> (2010).

Portability Policy <http://portabilitypolicy.org/generator.html>

Iubenda <http://www.iubenda.com>

PrivacyChoice <http://www.privacychoice.org>

Disconnect <https://disconnect.me/icons>

Open Notice <http://www.opennotice.org>

ToS;DR <http://www.tosdr.org>

# Promising Developments

- Efficient regulatory compliance
- Digitised legal work (robo-lawyers)
- Independent / crowd-sourced ratings
- Natural language processing and machine learning



# docracy

the web's only open collection of legal contracts and the best way to negotiate and sign documents online.

[find documents](#) [sign documents](#)

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*- Kathy F., Elyria, Ohio*



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**Our Services**

Cookie Audit

Cookie Policy Generator

Optanon ePrivacy

Custom Development

Consultancy

Reseller Program


## Cookie Policy Generator

Having an accurate and up-to-date cookie policy, that explains exactly how you cookies on your site, is crucial to making sure you are obtaining **informed consent** from visitors.

On its own, it may not make your site **strictly compliant** with the cookie law in all parts of the EU, but if you want to avoid user intrusive pop-ups or opt-out controls, it is regarded by many as the **absolute minimum** any website should have.



Our Cookie Policy Generator is a simple solution to putting together an easy to

 | PRIVACY POLICY GENERATOR FOR: [Websites](#) [Facebook apps](#) [Mobile apps](#) [Login / Signup](#) [GE](#)  
[FEATURES](#) [LEGAL INFO](#) [USE CASES](#) [PRICING](#) [GUIDES](#) [BLOG](#)

# Generate a privacy policy in seconds Easy. Fast. Beautiful.

Start **generating** a privacy policy,  
or **scroll down** to learn more :)

[Follow](#) [Share](#)

You don't have a website (yet), but you'd like to receive an update once in a while?  
Leave your email!

Generate a privacy policy for your website  



# Terms of Service Didn't Read

**“I have read and agree to the Terms” is the biggest lie on the web. We aim to fix that.**

We are a user rights [initiative](#) to [rate and label](#) website terms & privacy policies, from very good [Class A](#) to very bad [Class E](#).

Terms of service are often **too long to read**, but it's important to understand what's in them. Your rights online depend on them. We hope that our ratings can help you get informed about your rights. Do not hesitate to click [on a service below](#), to have more details! You can also get the ratings directly in your browser by installing our web browser add-on:

# Ratings

Services Topics

Search e.g. facebook, twitter, search...

## Google Class C

- 👎 Google keeps your searches and other identifiable user information for an undefined period of time
- 👎 Google can use your content for all their existing and future services
- 👎 This service tracks you on other websites
- 👎 Google can share your personal information with other parties
- 👎 No promise to inform you about data requests from governments

📖 [More details](#)

## YouTube Class D

- 👎 Terms may be changed any time at their discretion, without notice to the user
- 🚫 They can remove your content at any time and without prior notice
- 👎 The copyright license is broader than necessary
- 👎 Reduction of legal period for cause of action
- 🚫 Deleted videos are not really deleted

📖 [More details](#)

## SoundCloud Class B

- 👍 You stay in control of your copyright
- 👍 Collected personal data used for limited purposes
- 👍 6 weeks to review changes
- 👎 Indemnification from claims related to your content or your account
- 👎 Personal information can be disclosed in case of business transfer or insolvency

📖 [More details](#)

## GitHub Class B

- 👍 You don't grant any copyright license to github
- 👎 Changes can happen any time, sometimes without notice
- 👎 You shall defend and indemnify GitHub
- 👍 Your personal information is used for limited purposes
- 👎 Your account can be suspended and your data deleted any time for any reason

📖 [More details](#)

# Ratings

Services Topics

Google

- Google keeps you...
- Google can use yo...
- This service track...
- Google can share...
- No promise to info...

More details

SoundCloud

- You stay in contro...
- Collected persona...
- 6 weeks to review changes
- Indemnification from claims related to your content or your account
- Personal information can be disclosed in case of business transfer or insolvency

More details

## YouTube

Share review <http://tosdr.org/#youtube>

**CLASS D** The terms of service are very uneven or there are some important issues that need your attention.

- 👍 Terms may be changed any time at their discretion, without notice to the user** [Discussion](#)  
They can change the terms of service any time they see fit, even without notification to the user. Your use of the service supposedly constitutes acceptance of the changes in the terms.
- 👎 They can remove your content at any time and without prior notice** [Discussion](#)  
Youtube reserves the right to decide if a video violates the terms of service, not only if the user is a copyright infringer, but also not limited to: if the content is about pornography, obscenity, excessive length. The content may be removed and the user's account terminated without prior notice and in the sole discretion of Youtube.
- 👍 The copyright license is broader than necessary** [Discussion](#)  
The user grants Youtube a worldwide, non-exclusive, royalty-free license that is sublicenseable and transferable, and that can be used without limitation for the promotion of the service, in any media format and through any media channel, provided it is in connection with Youtube, its successors' and affiliates'.
- 👍 Reduction of legal period for cause of action** [Discussion](#)

- You shall defend and indemnify GitHub
- Your personal information is used for limited purposes
- Your account can be suspended and your data deleted any time for any reason

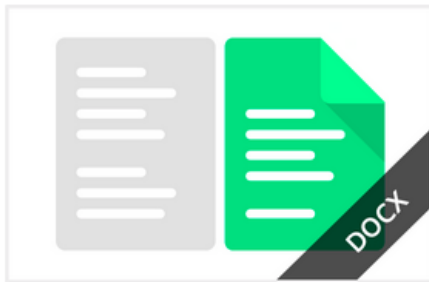
More details



LEGALSIFTER

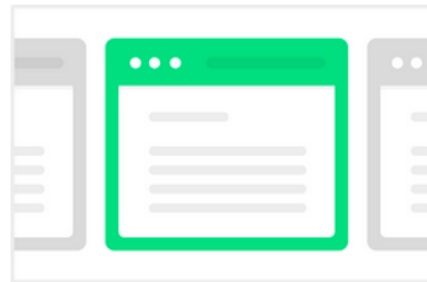
Upload a Contract

## How Does it Work?



### Upload a Word Doc

Upload Any Creative Project Contract, Whether You're a Designer or Developer



### Our Servers Process It

Our Servers Use Natural Language Processing to Analyze the Text



### Suggestions in 30 Seconds

See 3 Ways to Improve Your Contract Based on Real Legal Knowledge

“How fair is your contract? Find out in seconds.” - LegalSifter.com

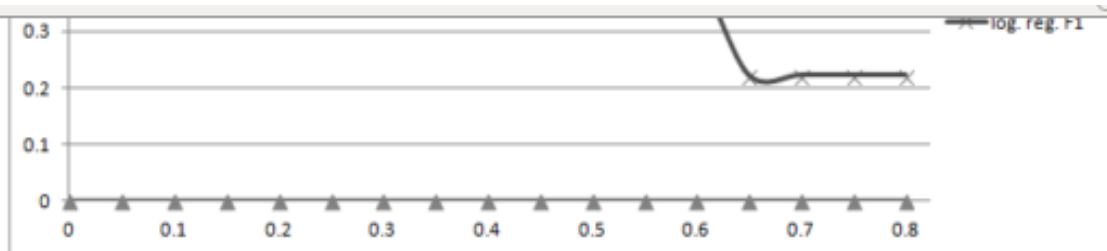


Figure 1: Performance results for the transparency task.

Feature	Average Impact	% of 0-Label	% of 1-Label	Feature	Average Impact	% of 0-Label	% of 1-Label
account	13.09	100	100	information	-19.63	100	100
access	6.04	100	100	personally identifiable	-4.86	67	43
share	4.2	100	86	personally identifiable	-4.41	67	43
data	2.78	92	100	cookies	-3.58	92	71
using	2.07	83	86				

Table 2: Features with the greatest-magnitude positive (left) and negative (right) impact scores.

to the classification decisions for a given test set. We measure the average impact of a feature  $f$  in a train/test split of the data using the following formula:

$$\text{impact}(f) = \frac{1}{|split|} \sum_{(trainset, testset) \in splits} \text{weight}(f|trainset) \sum_{doc \in testset} \text{value}(f|testdoc) \quad (1)$$

Despite the use of  $L_2$  regularization, some frequent but not obviously informative features such as