

## Dignity Begins with an Understandable Privacy Notice

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## Privacy Begins With Transparency

- Dignity begins with individual knowledge about collection, use, disclosure and choices
- This is a global issue
- This presentation will discuss global harmonization around multi-layered notices

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## What Are We Talking About?

- A system of privacy notices that both communicate clearly and are compliant with applicable law
- Achieved via layering
  - **Very short notice where necessary**
  - **Template-based condensed notice for most situations**
  - **Complete notice on request**

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## The Way We Learn Should Drive Notices

- Academic research shows that individuals:
  - **Can absorb only a limited number of concepts**
  - **Have difficulty translating complex words into words they understand**
  - **Need to use short-term and long-term memories to process information**

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## Translation To Notices

- Notices must really be short
  - **No more than seven categories**
  - **No more than 28 lines of text**
- Notices must be in plain language
- Notices must use a common format
  - **Standardized template works best**

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## Notices Must Match the Situation

- Very short notices when space is limited
  - **One or two sentences may work**
- Condensed notices for most situations
  - **Template-based, with common format**
- Complete notice always available upon request
  - **Contains all legally-mandated elements as well complete description of corporate practices**

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**Very Short Notice**

**Privacy Message**  
 Marty's Store collects and uses information for marketing purposes.  
 To learn more call 0800 33 333 or go to [www.martys.com](http://www.martys.com) and click on privacy.

**Condensed Notice For Most Situations**

- Six categories
  - Who is accountable for the notice
  - What is being collected
  - How will it be used and shared
  - Choices
  - Contact information
  - Other important information

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**World Company**  
 Condensed Privacy Notice  
 A complete privacy notice is available on request

Dated: April 2004

**SCOPE** This privacy notice applies to World Company and all of its family of companies that share the World name.

**PERSONAL INFORMATION**

- We collect information directly from you when you open an account or buy a product.
- We maintain information on your activity with us, including your visits to our website.
- We use information from other companies to qualify you for an account.

**PURPOSES & DECISIONS**

- We use this personal information to fulfill your requests, manage your account and offer you other products and services.
- We use information collected from our website to personalize your repeat visits to our website.
- We disclose this information to our family of companies with the same name so they may offer your products and services.
- We disclose information to co-marketers so that we may offer their products to you.

**YOUR CHOICE**

- You may opt out of receiving advertisements from us.
- You may opt out of product offers from others. This opt out covers co-marketing.
- To exercise your choices, call 00 32 2 326 2288 or click on "choice" at [world.com](http://world.com).

**ACCESS**

- You may request access to your information.
- You may request correction or removal of information you believe to be inaccurate.

**HOW TO REACH US**

For detailed notice or access and correction:

- Privacy Department World Company
- Kloostreeg 11
- 1850 Strombeek, Belgium
- Call 00 32 626 66 22
- Or go to the privacy notice on our website at [world.com](http://world.com)

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**Multi-Layered Notice History**

- Triggered by US legislation mandating privacy notices by financial services companies
- CIPL Notices Project
- December 2001 workshop
- 25<sup>th</sup> Data Protection Commissioners' Conference Resolution
- Berlin Workshop

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**Global Developments**

**Europe**

- Article 29 Working Party signaled support of multi-layered notices at Cambridge Conference
- Common position expected in the Fall

**OECD**

- Multi-layered notices are on their work plan
- 2005 Workshop in development

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**Global Developments**

**United States**

- Health & Human Services has endorsed healthcare privacy notices
- Financial services alternative notices process
  - Conducting research
- Treasury recommendation
  - Food label-like notices

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## Global Developments

### Canada

- Condensed notices being developed for healthcare

### Asia Pacific

- Hong Kong testing
- Australian private sector initiative
- ECOM recommendation in Japan

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## Tasks

- Research
- Education and dialog
- Standards for short and condensed notice format and language

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## Questions or Comments...

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