

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 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
 Dated: April 2004

A complete privacy notice is available on request

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.

ACCESS

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

HOW TO REAGREE

For detailed notice or access and correction:

- Privacy Department World Company, Klostreeg 11, 1850 Strombeck, Belgium
- Call 00 32 626 66 22
- Or go to the privacy notice on our website at 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
- 25th 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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