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## **Preface**

For ten years **P&AB** has been providing the business community with information on privacy policies. In 1993, companies that attended **P&AB**'s first annual conference received a compilation of business privacy policies. The volume was slim, but the numbers have continued to grow over the years. Beginning in 1994, **P&AB** began publishing the Handbook of Business Privacy Policies and Codes. The Handbook grew over the years and began to incorporate transborder data flow issues facing multinationals and various international laws and model codes.

Recognizing the growing prominence of Internet companies and organizations with online components, **P&AB** started compiling an online directory of privacy policies in 1998. Located on our PrivacyExchange.org website, these policies have been broken down by sector.

**P&AB** believes that now is the right time to introduce an interactive and searchable Privacy Policy Database. We are pleased to provide users with a database that brings together the policies of major organizations throughout multiple industry sectors and, will allow our users to benchmark their own company's policy and search for policies that meet a variety of privacy criteria.

# Privacy Policy Primer

## Privacy Policies and the Current Privacy Environment

As access to personal information becomes increasingly widespread, so do concerns over consumer privacy and the uses of personal data. Consumer concerns have escalated in the last few years over information sharing, online tracking, junk mail, telemarketing calls, and the spread of identity theft. Consumers are demanding that businesses develop and provide privacy policies detailing how their consumer information will be protected and used.

Government has taken a major role in responding to consumer interests by passing federal legislation to control the collection and use of financial, health and child-related information. Federal and state regulatory agencies and state attorneys general have stepped up their oversight and enforcement efforts, pursuing organizations that engage in alleged privacy violations. Organizations have also been contending with individual and class-action lawsuits generated by privacy practices. Enforcement actions and lawsuits have resulted from such practices as deceptive uses of customer information not addressed in a privacy policy or unintentional disclosures or breaches of customer information in violation of confidentiality assurances. Investigations and lawsuits can also create unwanted media attention.

Even when no formal investigation or lawsuit has been initiated, organizations' privacy practices have received public scrutiny from privacy, consumer advocacy and public interest groups. Such criticisms – which can be directed at a single company or based on a study of companies believed to represent a particular industry – often receive media coverage. The majority of this coverage is not favorable to business and, in some cases, the organizations being scrutinized are not given an opportunity to dispute the allegations.

The current privacy environment creates a number of obstacles for organizations trying to implement an effective privacy strategy. Advocacy groups have been highly critical of the content and style of privacy policies, especially in the Internet and financial services sectors. At the same time, companies want to make sure that they are adhering to all legal requirements and that the policies accurately reflect business practices.

Recognizing the controversies associated with privacy policies, the Federal Trade Commission has tried to clarify issues involving privacy policy scope and content. FTC Chairman Tim Muris has noted that privacy policies are applicable to all company practices, regardless of their off or online location. The FTC also sponsored a privacy policy workshop for members of the financial services community. "Get Noticed: Effective Financial Privacy Notices," discussed consumer, advocacy group and industry opinions, addressed readability and content concerns, provided information on privacy policy generators and other tools, and stressed the importance of educating consumers about privacy policies.

## Do consumers want privacy policies?

*Survey Data*

Surveys have provided evidence of consumer privacy fears and heightened security expectations. According to a 2001 Privacy Leadership Initiative survey, 83-91% of online consumers are somewhat or very concerned about the privacy of their information on the Internet. Two in five adults refuse to purchase over the Internet and 43% state "security" as the number one reason. Eighty-six percent of Americans familiar with privacy notices feel it is important for a website to have a privacy notice and 56% think it is very important. Nearly half of online users are willing to provide their personal information to a site that posts a notice. The top reasons for trusting a website include an adequate and thorough privacy notice that is both understandable and written in plain language.

More recently, **P&AB's** 2002 survey, "Privacy On & Off the Internet: What Consumers Want," reiterated consumers' privacy expectations. The majority of respondents believe that companies not following the promises laid out in their privacy policies is a major concern. Nearly 90% indicated that it is somewhat or very important that websites contain privacy notices. **P&AB** asked respondents how a privacy notice posted on a business website's homepage would affect their confidence in providing personal information to that website. While 79% of respondents indicated that such a notice would increase confidence to some degree, 16% believe that such a notice would provide a great deal of confidence and 21% said that it would help a lot. The numbers significantly increased when respondents were asked about a privacy policy that is detailed, easily accessible, explains how information is collected and used, and allows consumers to choose how their personal information is shared. Eighty-nine percent indicated an increased level of confidence, with 25% believing that such a notice would provide a great deal of confidence and 33% saying that it would help a lot.

Since a large majority of respondents are concerned about the accuracy of privacy policies, it is no surprise that consumers want independent verification of those policies. In fact, **P&AB's** survey found that consumers rate independent verification of privacy policies and a recommendation from a friend or family member as equally important when choosing a company with which to conduct business. Ninety-one percent of respondents would be somewhat or much more willing to conduct business with a company whose privacy policy has been verified. Conversely, 83% of respondents said that they would stop doing business with a company if they thought customer information was being used in an improper way.

#### *Adapting to Varying Consumer Privacy Expectations*

Although the survey data demonstrates a clear consumer belief in the importance of privacy policies, different types of consumers display different actions and behaviors on privacy issues. The three major segmentations formulated by **P&AB's** Dr. Alan Westin are Privacy Fundamentalists, who are very concerned about privacy; Privacy Unconcerned, who have little or no privacy concerns; and Privacy Pragmatists, who represent a privacy middle ground in which the costs and benefits of sharing personal information and privacy-protection promises are assessed on a case-by-case basis. According to the results of a 2003 Harris Interactive survey of Dr. Westin's privacy segmentation of the U.S. public, the majority of consumers are Privacy Pragmatists (64%), about a quarter are Privacy Fundamentalists (26%), and 10% are Privacy Unconcerned.

To account for different consumer segments, **P&AB** advocates the creation of a multi-tier privacy notice. In the **P&AB** model, tier 1 consists of a short notice that includes a clear, but brief treatment of the company's core privacy policy components. Tier 2 is a full privacy presentation, in which the main privacy policy components are reviewed in further detail and examples are presented. The third tier of the policy contains detailed legal and technical information. Since some consumers will not read privacy policies at all, others tend to evaluate the broad promises, and some skeptical consumers will closely evaluate the entire policy, multi-tier privacy policies can serve these varying consumer behaviors and expectations.

## **How can privacy policies help business?**

### *Consumer Trust in the Current Privacy Environment*

Consumers' increased awareness of privacy issues over the last few years is due, in part, to heightened media attention of consumer profiling, marketing techniques, affiliate and third party information sharing and other uses of consumers' personally identifiable information that have been exacerbated by the Internet and other technological advances.

In addition to general awareness, consumers have been confronted with the negative effects associated with current data practices and procedures. Identity theft stories have bombarded media reports, both in major newspapers and network television. The Federal Trade Commission noted that identity theft has become the number one consumer complaint. In fact, Identity theft concerns have spawned a whole new line of products. Recognizing consumer anxiety, companies are offering identity theft insurance, providing unlimited access to various credit reports, and even offering to monitor credit activity and notify the consumer if anything suspicious shows up.

While consumer awareness of privacy issues has gone up, confidence in business has not. **P&AB** surveys have tracked a steady decline in the public's trust of business since the late 1990s. In the 2002 "What Consumers Want" survey, only 43% of the public said that they would place trust in business leaders. This level of trust was lower than TV newscasters and pollsters.

**P&AB's** survey data showed that privacy policies are a way for business to gain consumer trust and increase confidence levels in business practices. With consumer awareness of privacy issues up and trust in business down, privacy policies can provide businesses with a way to differentiate themselves from competitors, and instill trust in current and potential customers.

### *Privacy as a Selling Point*

Privacy policies are a way for organizations to communicate with consumers. Many businesses have begun to use their privacy practices as a selling point. Such initiatives have been launched across multiple industry sectors, taking advantage of the specific consumer privacy concerns within a particular industry. Internet service providers are increasingly trying to assure customers that they are offering and enhancing programs to keep unwanted junk e-mail to a minimum. Likewise, several financial services organizations have used their policies regarding the collection, use and dissemination of

customer information as a way to attract business and differentiate themselves from competitors.

When consumer and privacy advocacy groups conduct studies and surveys, organizations that receive high privacy marks can receive favorable press attention. In a recent 2003 study of the food, beverage and tobacco industry's online privacy practices by the Customer Respect Group, participants receiving high marks were noted in media reports for their display of privacy policies and providing customers with a way to easily contact the company.

### **How Can Not Having a Privacy Policy Hurt Business?**

If a privacy policy can increase consumer trust and confidence in an organization's data practices, then not having a privacy policy can have the opposite effect. In the past, companies with privacy policies were the minority. Presently, through consumer pressure, changing business models and legal requirements, privacy policies are no longer a rarity. Online, a large majority of websites have a privacy policy, or at the very least, privacy information embedded in other materials, such as terms of service agreements or statements on website security. As company privacy policies continue to be seen more and more as the norm, companies without privacy policies risk adverse reactions from consumer segments that actively seek out such notices.

In addition to merely having a privacy policy, business can also be affected by policy content. In the financial services industry, for example, the Gramm-Leach-Bliley Act requires that customers receive annual privacy notices. Merely having a privacy policy will not differentiate an organization from competitors. Instead, consumers may rely on specific company privacy practices to gauge their level of trust in an organization.

**P&AB's** 2002 "What Consumer Want" survey found that consumers' greatest concerns are companies selling their information to third parties, individuals improperly accessing their information, and personal information being stolen or used by a hacker. So companies that do not explain their data collection, use and dissemination practices in a manner that is understandable to the customer also risk diminished trust levels, which in turn could affect a company's bottom line.

## Privacy Policy Database Tutorial

Welcome to the Privacy Policy Database! Now that the PPD is nearing completion, **P&AB** believes that the Ninth Annual National Conference is a good time to provide our members and others who will use PPD with an overview of the database's content and how to maximize privacy policy searches.

The Privacy Policy Database is organized around 13 industry sectors, including financial services, healthcare, telecommunications, Internet, tourism and education. Each industry has search capabilities based on privacy policy topics and consumer options.

### How PPD was created

**P&AB** experts have assembled privacy policies from both company websites and offline mailers. Privacy policies located online were converted into PDF form. Online policies located on more than one webpage were combined into a single PDF file. To provide users with a more accurate account of how consumers would be expected to read and navigate through a policy, the table of contents for multi-page policies has been given live links. Offline policies have been scanned and placed into a single PDF file in a manner most closely resembling their true appearance.

Once the policies were assembled, the **P&AB** staff coded each policy based on a list of terms thought to be useful to PPD users. Two different types of terms were used for coding.

- The first involves information stated in the privacy policy, such as company third party information sharing practices and the methods by which a consumer can opt-out of certain types of information sharing.
- The second category of terms does not involve information stated in a policy. Instead, **P&AB** experts have included a list of unstated terms we believe our users will find useful. These include the industry (or industries) that a specific organization belongs to and the specific privacy-related laws that an organization is legally obligated to follow.

Some of these terms can have multiple meanings or be interpreted in a variety of ways. Furthermore, actual business practices do not always fit perfectly into a particular category. To ensure accuracy and consistency throughout the coding process, **P&AB** has created a detailed glossary of all the coded terms and the specific way the each term was applied during the coding process.

### What the PPD is

The Privacy Policy Database provides users with a way to see how other organizations are formulating and expressing their privacy policies. Each industry is distinct and no "model" privacy policy can be all-encompassing or ideal for every company. The nature of the data collected, how it is used and varying business-consumer relationships all

require privacy policies to be case-specific. As such, the PPD was set up to provide users with the flexibility to search for policies that meet their organization's objectives. Users can benchmark their policies against those in the same industry, generate a list of policies bound by the same privacy-related federal regulations, or view a list of policies that explain a specific Internet term.

What the user can learn from the results is open-ended. For example, users can evaluate the scope of policies among industry peers, or see how organizations explain their use of cookies or other online tracking devices.

### **What the PPD is not**

The Privacy Policy Database does not rank the attributes of a policy, such as readability or content. The policies do provide users with a representative sample of privacy policies within a specific industry.

**P&AB** has coded each organization's privacy policy based on the policy's presentation and the specific privacy practices communicated by the organization. **P&AB** makes no promise that organizations will actually adhere to and comply with the privacy practices laid out in their policies. For example, if a company provides a toll-free number for customers to opt-out of third party information sharing in its privacy policy, then "toll-free number" will be coded as a consumer response method. **P&AB** does not try to verify that such a consumer response method is actually available or how well it is administered.

Conversely, organizations might adhere to certain privacy practices, but fail to explicitly state them in their privacy policy. For example, if Company A provides a toll-free number for customers to opt-out of third party information sharing, but fails to note this in its policy, searching for companies that provide toll-free numbers will not yield Company A. Since privacy policies are a way for organizations to communicate with customers, **P&AB** has based its coding system only on the terms that are explicitly communicated in the policy.

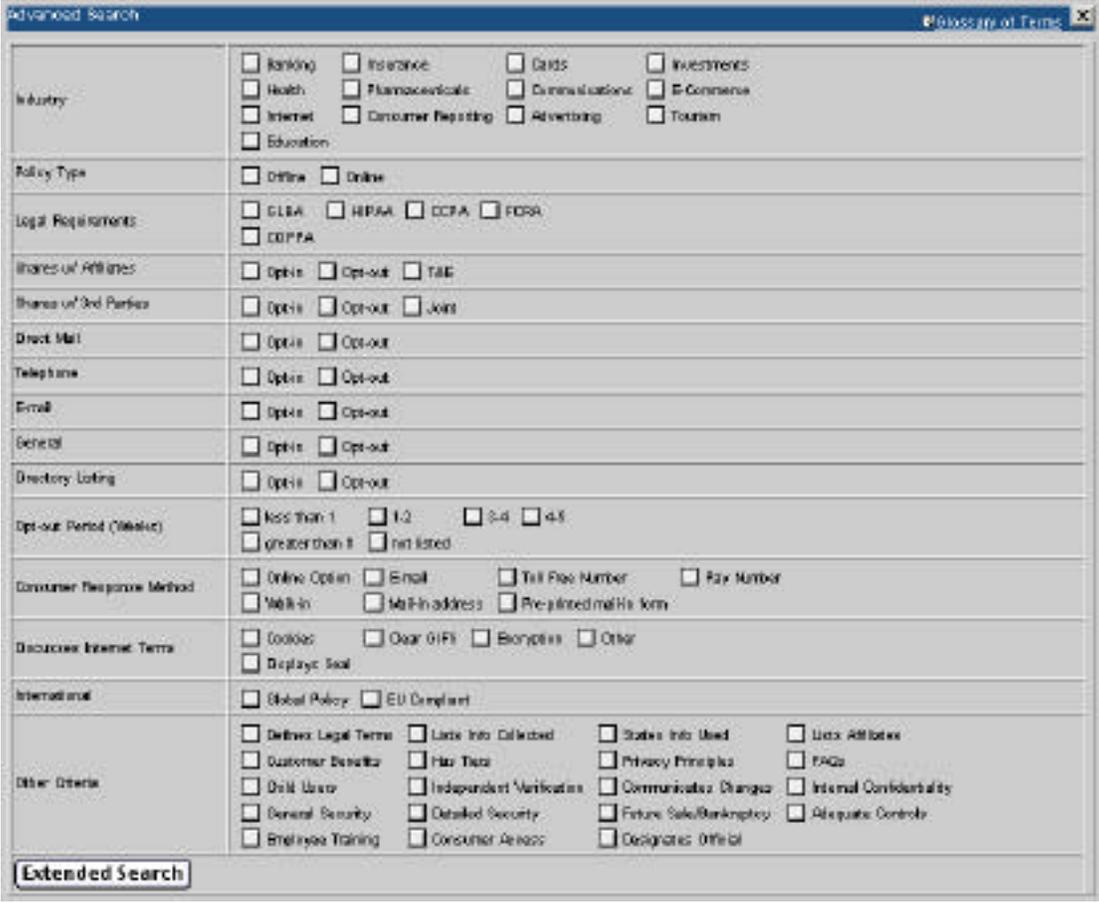
## How to use the PPD

### ADVANCED SEARCH PAGE

As of early March 2003, the PPD has nearly 200 company privacy policies coded and in its files (and more will be added quarterly).

By checking a term and hitting the search button, a user will generate a list of all policies that apply to that term. For example, checking “banking” and hitting the search button will generate a list of all bank privacy policies.

Checking multiple terms and hitting the search button will generate a list of policies that cover ALL of the selected terms. For example, checking “banking,” “online,” and “cookies” will generate a list of online bank privacy policies that discuss cookies. Online bank policies that do not discuss cookies will NOT be included in the search results.



The screenshot shows a web-based search interface titled "Advanced Search" with a "History of Terms" link. The interface is organized into several sections, each with a list of search criteria and checkboxes:

- Industry:** Banking, Health, Internet, Education, Insurance, Pharmaceuticals, Consumer Reporting, Finance, Communications, Advertising, Investments, Consensus, Tourism.
- Policy Type:** Offline, Online.
- Legal Requirements:** GLBA, HIPAA, CCPA, FDPA, COPPA.
- Shores of Affiliates:** Opt-in, Opt-out, T&E.
- Shores of 3rd Parties:** Opt-in, Opt-out, Joint.
- Direct Mail:** Opt-in, Opt-out.
- Telephone:** Opt-in, Opt-out.
- Email:** Opt-in, Opt-out.
- General:** Opt-in, Opt-out.
- Directory Listing:** Opt-in, Opt-out.
- Opt-out Period (Weeks):** Less than 1, 1-2, 3-4, 4-5, greater than 5, not listed.
- Consumer Response Method:** Online Opt-in, Email, Mail-In, Mail-In address, Pre-printed mail-In form, Toll Free Number, Pay Number.
- Discuss Internet Terms:** Cookies, Clear GIFs, Encryption, Other, Display Seal.
- International:** Global Policy, EU Compliant.
- Other Criteria:** Deliver Legal Terms, Update Info Collected, State Info Used, Link Affiliates, Customer Benefits, Hit Tags, Privacy Principles, FAQs, Do Not Track, Independent Verification, Communicator Changes, Internal Confidentiality, General Security, Detailed Security, Future Sale/Bankruptcy, Adequate Controls, Employee Training, Consumer Access, Designate Official.

At the bottom of the form is a button labeled "Extended Search".

- To view a list of all companies with privacy policies in the database, simply leave all term boxes unchecked and hit the search button.

## RESULT DISPLAY

Search results will be displayed on the Result Display page. Users will see a list of organizations with privacy policies that match the desired search criteria. Next to each organization will be a link to a detailed description of the organization's privacy policy.

PRIVACY & AMERICAN BUSINESS  
A Comprehensive Report and Information Service  
CONTACT P&AB PRIVACY POLICY P&AB MEMBERSHIP

PANDAB.org | Member Policy Database  
[Welcome](#) | [My Profile](#) | [Policy Database](#) | [Log Out](#)

Welcome | [Home](#) - Please select from your menu options above!

P&AB Policy Library - Result Display - Total Records:2 Found [Privacy of Terms](#)

[Advanced Search](#)

| Key | Company Name | Industry             | View Details            |
|-----|--------------|----------------------|-------------------------|
| 1   | Company A    | Banking              | <a href="#">Details</a> |
| 2   | Company B    | Banking, Investments | <a href="#">Details</a> |

## RECORD DETAILS

This page will present the user with a profile of an organization. All of the terms that apply to the organization's privacy policy will be displayed. Additionally, the Record Details page will allow users to view a copy of the organization's privacy policy.

PRIVACY & AMERICAN BUSINESS  
A Comprehensive Report and Information Service  
CONTACT P&AB PRIVACY POLICY P&AB MEMBERSHIP

PANDAB.org | Member Policy Database  
[Welcome](#) | [My Profile](#) | [Policy Database](#) | [Log Out](#)

Welcome | [Home](#) - Please select from your menu options above!

P&AB Policy Library - Record Details - 1 Record Found [Privacy of Terms](#)

|                           |  |
|---------------------------|--|
| Company Name:             | Company B  |
| PDF File Upload:          | <a href="#">CompanyB.pdf</a>   |
| Industry:                 | Banking, Investments   |
| Policy Type:              | Online   |
| Legal Requirements:       | GLBA, FDRA   |
| Share w/ Affiliates:      | Opt-In   |
| Direct Mail:              | Opt-In   |
| Telephone:                | Opt-In   |
| Email:                    | Opt-In   |
| General:                  | Opt-In   |
| Consumer Response Method: | Online Option, Toll Free Number  |
| Other Criteria:           | Links Info Collected, General Security, Detailed Security, Consumer Access |

[Advanced Search](#) | [Back](#)

## Definition of Terms

### Industry

Lists all industries that the policy applies to. Many companies operate in more than one industry included in our database.

- **Banking:** traditional banks, online banks, and lenders.
- **Insurance:** property and casualty, life, and health insurers.
- **Cards:** credit card companies.
- **Investments:** brokerage firms and other investment companies.
- **Health:** health providers, health insurers, and online health information services.
- **Pharmaceuticals:** drugstores, pharmacy benefits providers, and drug manufacturers.
- **Communications:** telephone, wireless, cable and related companies.
- **E-Commerce:** online retail sites offering products and information.
- **Internet:** service providers, search engines.
- **Consumer Reporting:** credit bureaus and other consumer reporting organizations
- **Advertising:** online advertising companies.
- **Tourism:** airlines, hotels, car rental companies, and online reservation services.
- **Education:** colleges and universities.

### Policy Type

Denotes the location and coverage of the policy.

- **Offline:** Hardcopy version of a privacy policy.
- **Online:** Policy is located online.

### Legal Requirements

Whether the organization falls under the jurisdiction of certain law:

- **GLBA:** Gramm-Leach-Bliley Act
- **HIPAA:** Health Insurance Portability and Accountability Act
- **CCPA:** Cable Communications Policy Act
- **FCRA:** Fair Credit Reporting Act
- **COPPA:** Children's Online Policy Protection Act

### Shares with Third Parties

Whether the policy offers an opt-in or opt-out for information sharing with unaffiliated third parties, or whether the policy indicates joint marketing.

### Shares with Affiliates

Whether the policy offers an opt-in or opt-out for information sharing with affiliates, and whether the policy states that the company does or may share "transaction and experience information" and/or non-credit related information with affiliates.

- **Affiliate:** A company that owns or is owned by, or is related to another company by common ownership.
- **Transaction and experience information:** Information about the transactions a consumer conducts with the company and the experiences that the company has with a consumer. Examples of transaction and experience information include a consumer's payment history with his or her credit card company or the information related to a consumer's transactions made with his or her credit card. Examples of

non-credit related information may include identification information, such as name and address.

### **Direct Mail, Telephone, E-mail, General**

Does the policy offer an opt-in or opt-out for receiving direct marketing offers from the company by mail, telephone, or e-mail? "General" indicates that the policy states that the company offers an opt-in or opt-out for direct marketing offers from the company, but does not specify whether the choice applies to direct mail, telephone, and/or e-mail.

### **Directory Listing**

Does the policy state that the consumer's personal information will be used to create a public directory listing, for instance in a telephone book or Internet white pages, and does the policy state that the company offers the consumer an opt-in or opt-out choice for the directory?

### **Opt-Out period**

The length of time it takes for consumers' choices to be processed following a response to an opt-out. The numbers indicate the number of weeks the policy states that it will take an opt-out request to be processed. "n/i" indicates that the period for which it takes an opt-out to be processed is not included in the policy.

### **Consumer Response Methods**

What options does a consumer have to express preferences? These include the following:

- **Online option:** the company provides a secure online form on its Web site for the consumer to indicate opt-out or opt-in choices.
- **E-mail:** the company provides an e-mail address by which the consumer can express choices, or an unsubscribe link or address in an e-mail sent by the company.
- **Toll-free number:** the company provides a toll-free number.
- **Pay number:** the company provides a telephone number for expressing choice, but it is not toll-free.
- **Walk-in:** the company allows consumers to express choices in person at company branches and offices.
- **Mail-in address:** the company provides an address to which the consumer can express choices via a written letter.
- **Pre-printed mail-in form:** the company provides a pre-printed form on which the consumer can express choices and an address where the form should be sent.

### **Discusses Internet Terms**

Does the policy specifically explain terms and technologies particular to the online environment? This category is divided into the following subcategories:

- **Cookies, Clear GIFs, and Encryption:** "Clear GIFs" are also called "Web beacons," "Web Bugs," or "Action Tags."  
**Other:** "Other" indicates that the policy discusses other online terminology not delineated in the three subcategories above.
- **Has Seal** Does the policy state that the company is a member of an online privacy seal program?

**International**

- **Global Consumer Privacy Policy:** Does the policy state that it is global in scope, applying to all users or customers worldwide?
- **EU Compliant:** Does the policy state that it is compliant with the EU Safe Harbor privacy requirements?

**Other Criteria****Definitions of Legal Terms**

Does the policy use definitions to explain difficult legal terminology, such as "nonpublic personal information" and "affiliate"?

**Lists Information Collected**

Does the policy list what types of information are collected?

**States Information Used**

Does the policy state how consumer information is used?

**Lists Affiliates**

Does the policy contain lists of affiliates with whom it shares information?

**Explains Customer Benefits**

Does the policy appeal to the consumer by stating the benefits of sharing information or collecting information from the viewpoint of a consumer?

**Has Tiers**

Does the policy begin with a brief summary of the company's privacy policy, followed by a more detailed explanation? The brief summary would be a first tier. The more detailed explanation would be a second tier. Some companies may include an additional tier further explaining their privacy policies.

**Has Privacy Principles**

Does the company adhere to a set of privacy principles distinct from its privacy policy, and list these principles along with its privacy policy?

**Has FAQ's**

Is there a link to the privacy policy with a FAQs (Frequently Asked Questions) page explaining the privacy policy with questions and answers or further explaining certain online or legal terms?

**Independent Verification**

Does the policy state that the company is audited at regular intervals by an independent third party or governmental agency to verify that the company is following its privacy policy?

**Communicates Changes**

Does the policy include a section noting updates to the policy or what happens in event of a change in privacy policy?

**General Security Requirements**

Does the policy explain briefly that there are security measures to protect customer information?

**Detailed Procedures for Sensitive Information Transmission/Storage**

Does the policy go into further detail about security measures and procedures, discussing specific measures that the company takes, such as the use of encryption, firewalls and passwords?

**Internal Confidentiality**

Does the policy mention limiting access to sensitive information internally within the company?

**Future Sale or Bankruptcy**

Does the policy state what will happen to personal information in the event of a future sale or bankruptcy of the company?

**Adequate Controls**

Does the policy state that the company will take disciplinary actions in the event of a breach in the stated privacy policy?

**Employee Training**

Does the policy state that the company conducts employee training in relation to its privacy policy?

**Consumer Access**

Does the policy detail how consumers can keep their records up-to-date and accurate and how they can request changes in the record?

**Addresses Child Users**

Does the privacy policy address the company's privacy practices relating to children under 13?

**Designated Official**

Does the policy state that the company has a CPO or other designated official that oversees the company's privacy policy?

## **Supplementary Information**

The following is a list of supplementary materials that will be available to users at the Privacy Policy Database website.

### Privacy Compliance Primer

A summary of the privacy laws listed under “Legal Requirements” and how they affect business.

### Seal Programs

- Overview of Seal Programs
- Parts of a Seal Program
- Characteristics of a Seal Program
- List of Common Seal Programs

### Cautionary Tails

A review of organizations whose privacy policies have generated media attention. This includes organizations that have:

- Allegedly violated their privacy policies
- Been scrutinized for changes to their privacy policies
- Been charged with privacy policy inadequacies
- Received attention for the readability of their privacy policies

### Other Resources

Where to go for additional information and assistance on privacy policies, including:

- Books with information on privacy policies
- Privacy policy generators
- Regulatory assistance
- Industry associations guidelines