Nano-Notice: Privacy Disclosure at a Mobile Scale
Mobile Privacy

- High-profile privacy “surprises”

- CA AG’s office enforces the California Online Privacy Protection Act
  - Apps must have privacy policies if sold to California residents
  - Major app stores to require privacy policies (promised Feb 2012)

- New mobile guidelines & interest from US government offices
Mobile Privacy is Different

- Privacy notices inherit the same problems as desktop websites
- Hardware
  - Tiny screens
  - New sensor & data types
  - Carried everywhere
- Software
  - Apps initially had all-or-nothing permissions
  - Fewer self-help tools
- Wetware
  - Users may be on the go
  - Users may be seeking instant gratification, especially kids
  - Years with no privacy policies
Online Survey Methods

- Firefox test pilot 9/12, $n = 534$
  - 86% male
  - 28% “expert” in at least one computer language
  - 53% < 36 years old
  - slightly more concerned with privacy (Westin)
- Between subjects on “personal information” v. PII
- Between subjects on policy type
  - Natural language
- Split on data use categories
  1. Preferred timing for privacy disclosures
  2. Surprise around practices
Nearly all data collection is a surprise, even for first parties.
“Just-in-time notice” may be at time of purchase
Creating short notices

Can users ask questions or opt-out?

Summary
- You can ask privacy questions.
- You can ask privacy questions or opt-out of marketing.

Details

If you have any questions or concerns about our privacy policies, please contact us:
[CONTACT FORM URL] OR [EMAIL]
[PHYSICAL MAILING ADDRESS]

If you have given us contact information but do not want us to contact you with promotional or marketing information, you can opt-out here:
[LINK TO OPT-OUT FORM]

Please allow sufficient time for us to process your request.

Tips
- Nearly all privacy policies offer a way for users to contact you with privacy questions or concerns, and this is a legal requirement in some jurisdictions.
- **Option 1** applies if you do not send marketing communications by email, physical mail or otherwise.
- **Option 2** applies if you send marketing communications and have an opt-out process on your website (this may be the same as the opt-out link inserted in your marketing emails.
- You must insert your company contact information (email address or a link to your contact form) into the Details section, as well.

privacy choice
Resulting short notices

Privacy Policy

Effective on 2012-07-05

This privacy statement describes how Acme, Inc. collects and uses the personal information you provide. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

- Location Services
- Collection and Use
- Sharing Your Information
- Tracking and Ads
- Security
- Other Information
- Contact

Location Services

Some services on this site make use of location-based data. If you allow these services, we will collect information about the Wi-fi routers closest to you and the cell IDs of the towers closest to you.

We use this information to provide the requested location-based service, not to identify you. You will be asked for your permission each time a location-based service is requested.

- Provide you content based upon your location.

Back to top
Short notices are helpful for basic information
Hypothesis: users hear “Personally Identifiable Information” as simply information that is personal.
Nearly all data are seen as personal
Nearly all data are seen as Personally Identifiable Information
Implications (1 of 2)

* Privacy policy generators
  * In position to do a great deal of good for app developers and users. Point of leverage for best practices.
  * Did help comprehension for basic questions
  * Yet for each question, about 20% unsure

* Timing of notice
  * “Just in time” or contextual notice is often at point of purchase
  * Many users (think they) want notice every time
  * 10% never want notice. Design for them, too
Implications (2 of 2)

- Surprise
  - For nearly all types of data collection and use, for wallpaper app
  - Surprise likely captures context of the app (future work)
  - Unclear if surprise is a good heuristic. Does app do the task you asked it to do?

- Personal information and PII
  - Nearly all categories seen as both
  - Privacy policies that state they do not collect PII may be confusing
  - May not make sense to treat different types of data very differently
Nano-Notice: Privacy Disclosure at a Mobile Scale
Images

- All logos belong to their respective owners