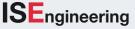


# A Human-in-the-Loop Approach for Information Extraction from Privacy Policies under Data Scarcity

Michael Gebauer, Faraz Maschhur, Nicola Leschke, Elias Grünewald, and Frank Pallas

Information Systems Engineering TU Berlin





Opinion | THE PRIVACY PROJECT

# We Read 150 Privacy Policies. They Were an Incomprehensible Disaster.

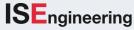
By Kevin Litman-Navarro

In the background here are several privacy policies from major tech and media platforms. Like most privacy policies, they're verbose and full of legal jargon — and opaquely establish companies' justifications for collecting and selling your data. The data market has become the engine of the internet, and these privacy policies we agree to but don't fully understand help fuel it.

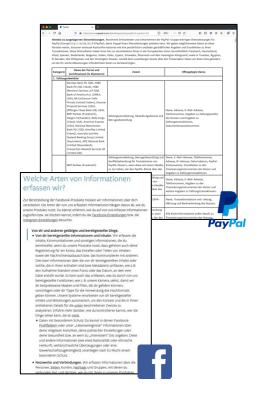
https://www.nytimes.com/interactive/2019/06/12/opinion/facebook-google-privacy-policies.html

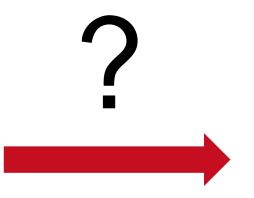


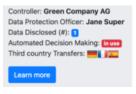
https://www.designboom.com/readers/dima-yarovinsky-visualizes-facebook-instagram-snapchat-terms-of-service-05-07-2018/











Browser-Plugins

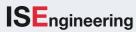


Visualising Data-Sharing-Networks



Privacy Icons

Grünewald et al. (2023). "Enabling Versatile Privacy Interfaces Using Machine-Readable Transparency Information". In Privacy Symposium 2023



# Indispensable: machine-readable representation



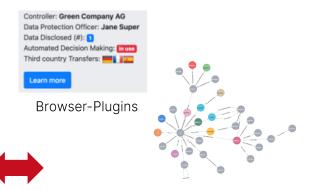




# Transparency Information Language & Toolkit

```
"name": "Green Company AG",
 "division": "Product line e-mobility",
  "address": "Wolfsburger Ring 2, 38440 Berlin",
  "country": "DE",
  "representative":
    "name": "Jame Super",
    "email": "contact@greencompany.de",
    "phone": "0049 151 1234 5678"
"dataProtectionOfficer":
  "name": "Jane Super",
  "address": "Wolfsburger Ring 2, 38440 Berlin",
  "country": "DE",
  "email": "contact@greencompany.de",
  "phone": "0049 151 1234 5678"
"dataDisclosed":
    "_id": "f1424f86-ca0f-4f0c-9438-43cc00509931",
    "category": "E-mail address",
    "purposes": [
```

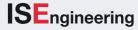
Grünewald and Pallas (2021). "TILT: A GDPR-Aligned Transparency Information Language and Toolkit for Practical Privacy Engineering". In ACM FAccT 2021.



Visualising Data-Sharing-Networks

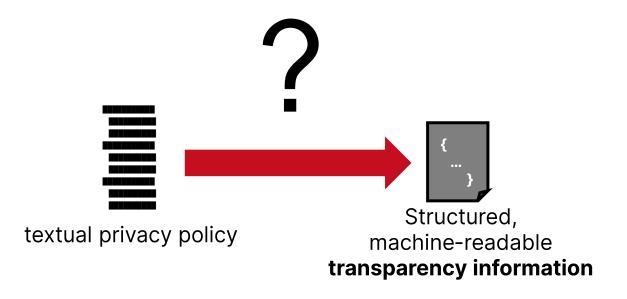


Privacy Icons



### How to get TILT?

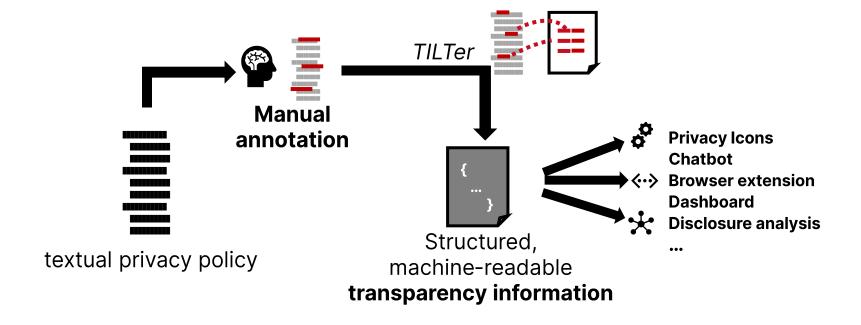






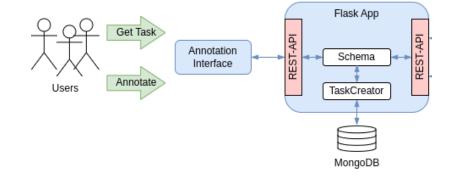
### **General Approach**





## **TILTer**





#### **Annotation Interface**



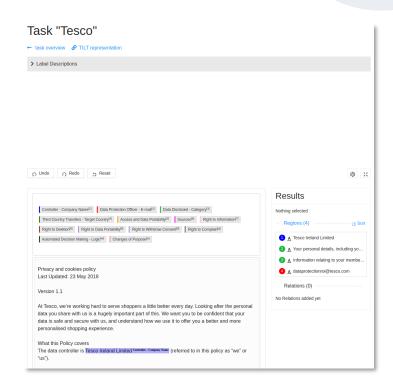
#### Hierarchically structured labels for:

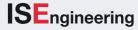
- Tokens, e.g.
  - DPO (name, e-mail, address, ...)
  - categories
  - purpose
- Sentences, e.g.
  - data subject rights
  - automated decision making
  - changes

#### Multiple tasks per policy:

Identify labels for a specific hierarchical level

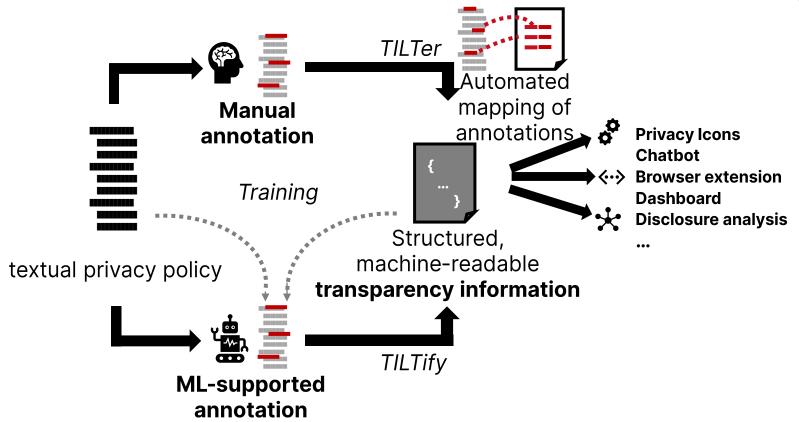
## → still, very tedious work!





### NLP Coming to the Rescue!





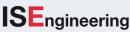


## **ML-supported Annotation of Privacy Policies**



OPP-115 data set (Wilson et al. 2016)

- Polisis (Harkous et al. 2018)
- TLDR (Alabduljabbar et al. 2021)
- ✓ reliable classification (F1: 0.83/0.91)
- improving navigability
- × data scarcity
- × creating detailed and accurate machine-readable representations



## Refining the Classification Task



#### **Annotations** for:

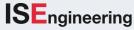
- Tokens, e.g.
  - DPO
  - categories
  - purpose
- Sentences, e.g.
  - data subject rights
  - automated decision making
  - changes

"We therefore would like to inform you about data privacy for websites under \*.tu.berlin."

"You can obtain information about the data we have stored about you free of charge at any time-without having to give a reason."

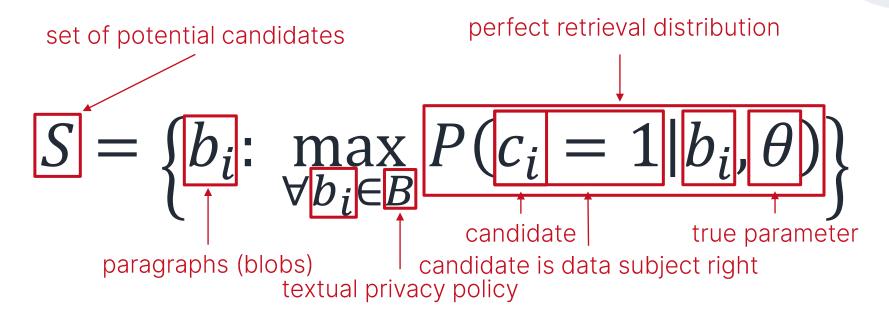
"You also have the right to object at any time to the processing of personal data concerning you that is carried out on the basis of Article 6 paragraph 1 lit. e and f EU-GDPR."

https://www.tu.berlin/en/data-protection



#### Sentence-based Information Retrieval







#### Sentence-based Information Retrieval

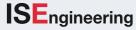


perfect retrieval distribution

$$S = \left\{b_i: \max_{\forall b_i \in B} P(c_i = 1 | b_i, \theta)\right\}$$

$$\hat{f}(b_i, \hat{\theta})$$

extraction model



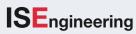
#### **Extraction Model**



Static Word Embeddings & Naive Bayes

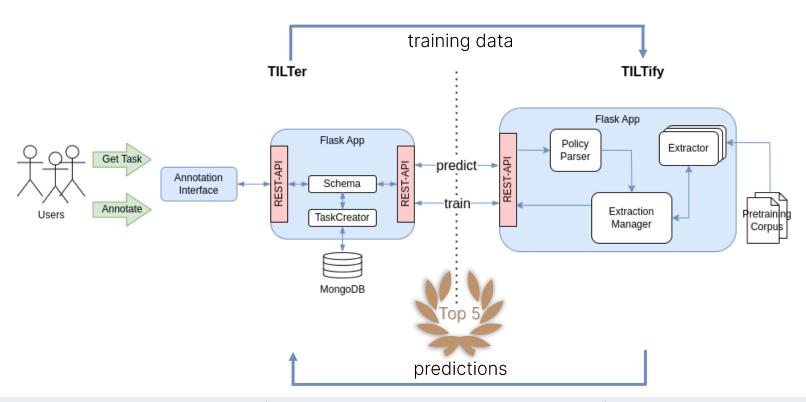
BinaryBERT

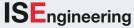
SentenceBERT

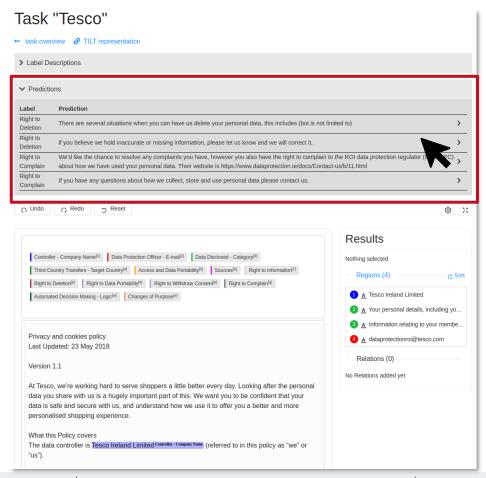


# Human-in-the-Loop

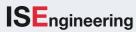






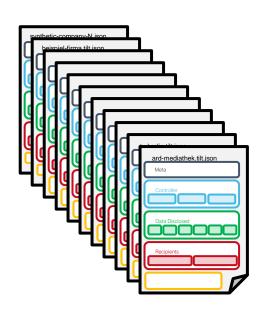






# Evaluation Dataset

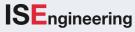




- German language
- data scarcity
- differing amounts of data subject rights
- 🕶 data imbalance:
  - >16600 paragraphs
  - <450 containing data subject rights

60 annotated policies

https://github.com/DaSKITA/tiltify/tree/main/data/annotated\_policies

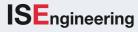






	Static Word Embeddings & Naive Bayes	BinaryBERT	SentenceBERT
Right to Information	0.18	0.0	0.93
Right to Deletion	0.0	0.0	0.86
Right to Data Portability	0.0	0.0	0.86
Right to Complain	0.29	0.15	0.93
Right to Withdraw Consent	0.0	0.08	0.90

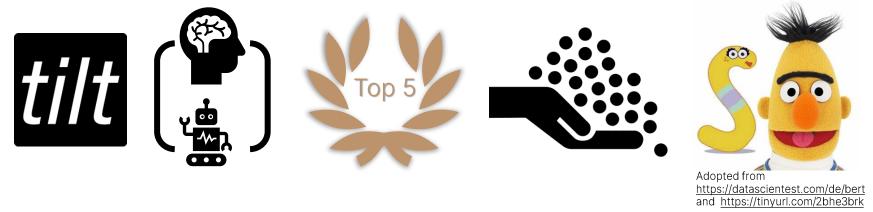
F1 Score (for 5-rank, if not stated otherwise)



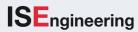
### Take-aways



We tackled problem of retrieving machine-readable transparency information from privacy policies under the constraint of data scarcity.



S-BERT - in conjunction with k-rank approaches - is extremely promising to simplify the annotation of privacy policies, even with few training data.







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