

Privacy Policy Regulation (PPR)

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Problem Statement

- California Online Privacy Protection Act & Federal Trade Commission Guidelines are inadequate
 - Technological advances
 - Not covering all cases
- Example:
 - HeLa Cells
 - Hello Barbie
 - Google WiFi Sniffing



Inspiration



- Guiding Principles
 - Belmont Principles
 - Solove's Taxonomy of Privacy
- References
 - California Online Privacy Protection Act
 - The EU General Data Protection Regulation

Framework

- ❑ Privacy Policy Overview
- ❑ Data
- ❑ Individual Choice & Access
- ❑ A/B Testing
- ❑ Privacy Invasion
- ❑ Privacy Policy Regulation Rubric
- ❑ Accountability & Enforcement

Privacy Policy Overview

- Scope
- Availability
 - Mobile Application Download
- Readability
 - Privacy Policy Rubric

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▀ Data

- Data Accessibility
 - View, Download, Delete
 - Granular control optional
- Data Collection
 - Physically located in the US
 - Don't collect information on others without consent
- Data Analysis
 - Personally Identifiable Information vs Broader trends
- Data Sharing
 - Delete data from affiliates & subsidiaries
- Data Recession
 - Easy to delete any data
- Data Protection
 - Measures in case of data breach
 - Accountable for Non-state sponsored data breach

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Individual Choice & Access

- Choice in analysis, sharing and recession of data
- In case of default opt-in, User needs to be warned. Require Consent before proceeding.
- Reasonable amount of time to honor request.



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A/B Testing

- Informed Consent
 - Related to content
 - How to opt-out
- Assessment of Risks and Benefits
 - Compensation
 - Need not be monetary
 - No discrimination
- Selection of Subjects
 - Choose fairly

Your organization's responsibility to explain A/B testing in simple language and type of testing that can be expected.

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Privacy Invasion



- User must be notified in case of privacy invasion
- You are responsible for third-party actions regarding insights
- Denial of service or reduced service.
- User can choose to remove any information

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Privacy Policy Regulation Rubric

Overview →	Scope		Availability		Readability	
Data →	Accessibility	Collection	Analysis	Recession	Sharing	Protection
Choice →						
A/B Testing →	Consent		Compensation		Selection	
Invasion →						

Good
Average
Poor

Example

Overview →	Scope		Availability		Readability	
Data →	Accessibility	Collection	Analysis	Recession	Sharing	Protection
Choice →						
A/B Testing →	Consent		Compensation		Selection	
Invasion →						

Good

Average

Poor

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Accountability & Enforcement

- ✓ Section 5 of FTC Act
- ✓ California's Unfair Competition Law
- ✓ 5 % of global annual revenue – Multi tier



References

- [EU Data Protection Directive](#)
- [The Belmont Principles](#)
- [FTC Guidelines](#)
- [California Online Privacy Protection Act](#)
- [A Taxonomy of Privacy – Daniel Solove](#)
- [The EU General Data Protection Regulation](#)
- [A/B Testing](#)
- [FTC Enforcement](#)
- [California's Unfair Competition Law Enforcement](#)