



How is the GDPR Affecting Privacy Policies?

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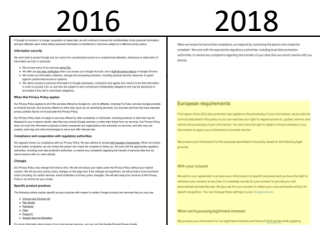
<https://EvadeML.org>

Background

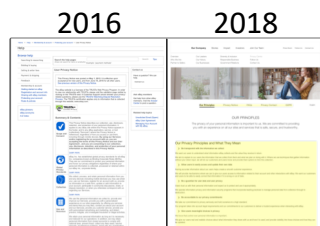
Effective May 25th, 2018, the General Data Privacy Regulation (GDPR) mandates a sweeping set of rules governing data protections and user privacy for European citizens and residents. The GDPR outlines 19 major requirements for notification of data practices.

Objectives

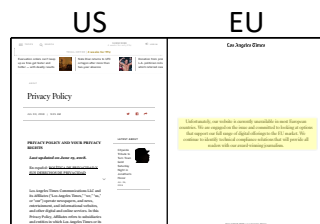
How have privacy policies changed since adoption of the GDPR?



New GDPR-related content?



User-centric language and formatting?



IP-based geo-blocking?

Methodology



Privacy policy collection



All US-based organizations on the Alexa Top 1000 List



Current privacy policies collected using Bing search API



Pre-GDPR policies collected from Wayback Machine



Manual policy analysis



Analyzed GDPR, creating a list of privacy policy disclosure requirements

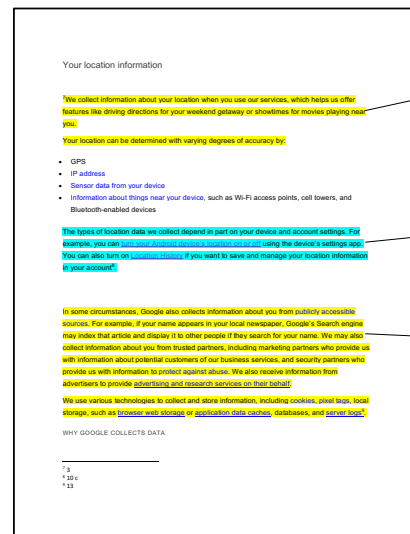


Selected five sites from Alexa Top 50 List



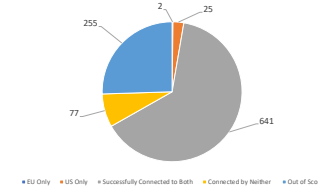
Using a new browsing session and a VPN, we collected policies through a proxy in London, England

Labeling Disclosure Requirements

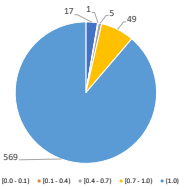


Preliminary Results

Alexa Top 1000: Policy Retrieval



US-EU Policy Similarity Ratio



Differences in Privacy Policies for Same Organization

Webpage	Before/After GDPR	US/EU	Redesign
Google	X	X	
Facebook	X	X	
Netflix	X	X	X
Twitch	X		
eBay	X		X

EU User: GDPR Privacy Policy Disclosure Requirements Met

Disclosure Requirement	Google	Facebook	Netflix	Twitch	eBay
Contact info of Controller	X	X	X	X	X
Contact details of DPO	X	X	X		X
Purposes & legal basis for processing	X	X	X	X	X
Categories of data concerned	X	X	X	X	X
Recipients of data				X	X
Intention of transfer to 3rd party	X	X	X	X	
Transfer adequacy decision	X	X	X		
Copy of safeguards	X			X	X
Period of data storage	X	X		X	X
Right to request access/rectify data	X		X	X	X
Request erasure or restrict	X		X	X	X
Ability to restrict processing	X	X	X	X	X
Object to processing	X	X	X	X	X
Right to data portability	X		X	X	
Right to withdraw consent	X	X	X	X	X
Right to lodge a complaint with S.A.		X	X	X	
Whether provision of data is required				X	X
Automated decision-making/profiling				X	X
Source of data about user	X	X	X	X	X

Planned Research



Customize GATE: Privacy Policy Annotation Tool



GDPR Privacy Policy Corpus



Measure Changes at Scale



Automated Tool for Policy Analysis