Demystifying Privacy Policy of Third-Party Libraries in Android Apps

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Abstract—The privacy of personal information has received significant attention in mobile software. Although previous researchers have designed methods to identify the conflict between app behavior and privacy policies, little is known about investigating regulation requirements for third-party libraries (TPLs). The regulators enacted articles to regulate the usage of personal information for TPLs (e.g., the CCPA requires businesses clearly notify consumers if they share consumers' data with third parties or not). However, it remains challenging to analyze the legality of TPLs due to three reasons: 1) Difficulties in collecting TPLs privacy policies. TPLs are mainly published on public repositories (e.g., Maven Repository, GitHub). The repositories do not require providing privacy policies to describe artifacts' privacy access behaviors. Thus, there is no unique channel, like Google Play, to collect privacy policies of TPLs. 2) Difficulties in analyzing TPL's user privacy access behaviors. TPLs are mainly provided in binary files, such as jar or aar, and TPL's whole functionalities are usually not executed independently without host apps. 3) Difficulties in identifying consistency between TPL's functionalities and privacy policies, and host app's privacy policy and data sharing with TPLs. This not only requires analyzing privacy policies of TPLs and host apps, but also requires analyzing their functionalities. In this paper, we propose an automated system named ATPChecker to analyze whether Android TPLs comply with the privacy-related regulations. We construct a data set that contains a list of 458 TPLs, 351 TPL's privacy policies, 187 TPL's binary files and 642 host apps and their privacy policies. Then, we analyze the bytecode of TPLs and host apps, design natural language processing systems to analyze privacy policies, and implement an expert system to identify TPL usagerelated regulation compliance. The experimental results show that 23% TPLs violate regulation requirements for providing privacy policies. Over 37% TPLs miss disclosing data usage in their privacy policies. Over 52% host apps share user data with TPLs while 65% of them miss disclosing interactions with TPLs. Our findings remind developers to be mindful of TPL usage when developing apps or writing privacy policies to avoid violating regulations.

Index Terms-Privacy policy, third-party library, Android

I. Introduction

Nowadays, smartphone and mobile apps are playing essential roles in our daily lives [1]. Besides, more and more developers tend to use many off-the-shelf third-party libraries (TPLs) to facilitate the development process, to avoid reinventing the wheel [2]. However, developers may omit the privacy threat in TPLs. For example, the advertisement libraries may leak users' personal information (e.g., IMEI) [3]. Some TPLs (e.g., advertising and analytic libraries) rely on

personal information to provide better service [4]. However, TPLs may collect user data that is not necessary for providing related services. Such behaviors may lead to privacy leakage or even security concerns [5]-[7]. Besides, the permission mechanism of Android also increases the possibility of leaking user privacy by TPLs [8]–[18]. Since the host apps share the same process space and permissions with TPLs, the mechanism violates the principle of least privilege, which leads to TPLs being over-privileged. Recent papers find that permission abuse makes TPLs access users' personal information and causes potential privacy leakage [19]-[26]. In addition, the incorrect use of TPLs [26]–[28] may cause serious personal information leakage. For example, a recent report [26] discloses that popular Android apps with over 142.5 million installations leak user data to unauthorized third parties. Zhang et al. [27] disclose 120 of 555 apps that share users' personal information to analytic service TPLs without encryption. Besides, linking and mining large amounts of unencrypted personal information probably pose threats to serious personal privacy leakage [28], [29]. Thus, it is urgent to design a system to check the data access behavior and privacy policies of TPLs so that we can determine if TPLs are compliant with privacy regulations.

To normalize privacy-related behaviors and prevent privacy leakage, various privacy-related regulations (e.g., California CONSUMER PRIVACY ACT (CCPA), GENERAL DATA PROTECTION REGULATION (GDPR)) [30]-[34]) have been promulgated to protect people's personal information from being abused. However, app developers may unconsciously violate regulations of used TPLs because they do not need to understand the execution logic of these TPLs, they just need to follow the user guidelines to invoke these TPLs. Due to a lack of security consciousness, developers may never check whether these used TPLs in their apps have a privacy policy and whether these TPLs may have security risks with respect to privacy leakage. The latest Google Play Developer Program policies (GPDP) [35] asks developers to ensure the TPLs used in their apps are compliant with GPDP [36]. Developers of TPLs are required to provide privacy policies and disclose data usage. Otherwise, apps may violate regulation or market's requirements and be removed from the app market [37], [38]. To help TPLs comply with regulations and help developers correctly use TPLs, it is necessary to analyze the consistency between TPLs' data usage and privacy policies.

Previous work [27], [39]-[44] has proposed methods to analyze privacy issues of apps, such as analyzing the consistency between apps' privacy policy descriptions and behaviors. However, existing methods cannot identify the app's privacy issues related to the usage of TPLs inside apps because existing methods fail to identify TPLs functionalities or analyze TPL privacy policies. PoliCheck [39] performs dynamic analysis to get traffic flow for analyzing the apps' data usage. Then, it applies data and entity dependency tree analysis to extract data usage statements from the privacy policy, and designs rules to identify the conflicts. PPChecker [40] discovers the trustworthiness of apps' privacy policies, and identifies consistency of app's behavior and privacy policy statements and the consistency of privacy policies from different sources. PPChecker concentrates on apps' privacy policies and is outof-dated to satisfy the latest regulations.

Based on our study, we find there is still a research gap with respect to discrepancy analysis between the privacy-related behaviors of TPLs and regulations. To this end, we propose a tool, named ATPChecker (Automated Third-party library **Privacy** compliance **Checker**) to automatically check whether the usages of in-app TPLs complies with privacy-related regulations (e.g., GDPR Article I.(47), COPPA 312.2, CFR 332.6). As regulation analysis requires expert knowledge of both legal and software engineering, we invited one expert and one senior researcher to read through related regulations [30]-[33], [45]–[47] and summarize requirements for TPLs. Both of them have conducted research on software engineering and privacy policy analysis with experience over seven years and two years, respectively. ATPChecker identifies the inconsistency between TPLs and regulation by analyzing TPLs' bytecode (§III-A) and privacy policies (§III-B). For example, ATPChecker discovers whether TPLs correctly provide privacy policies. ATPChecker discloses whether host app's TPL usage comply with regulations(§III-C, §III-D).

It remains challenging to develop ATPChecker. First, it is non-trivial to get TPLs and corresponding privacy policies because TPLs are mainly published on repositories, such as Maven Repository [48] and GitHub, which do not require developers to provide privacy policies to describe their user privacy access behaviors. To counter this issue, we first construct a data set that contains TPL repository and host app repository. The TPL repository contains a) a TPL list, which contains 458 TPLs crawled from AppBrain [49], b) 187 TPLs' binary files, which are in the format of jar or aar, from Maven Repository [48], and c) 351 TPLs' privacy policies which are manually collected. The details of dataset components and relations are given in §IV. The host app repository contains a) 642 distinct host apps which are collected from Google Play based on the list from AppBrain and b) the host app's privacy policies. Second, it is not easy to analyze TPLs' user privacy access behavior because TPLs are mainly provided in the format of binary files, such as jar and aar, and TPLs' whole functions may not be executed independently without being triggered by host apps. ATPChecker performs static analysis [50], [51] on TPLs and uses data flow analysis to trace TPLs' personal information usage without depending on TPLs' source code (§III-A). We exclude dynamic analysis since it cannot execute all possible paths in apps or TPLs [52]. Third, analyzing privacy policy is difficult because developers use various natural languages to describe the usage of personal information and TPLs. To analyze data and TPL usage-related statements in privacy policies, ATPChecker implements an expert system to extract abstract data usage patterns (§III-D) and analyzes TPL usage compliance.

Overall, our contributions are summarized as follows:

- We propose a novel system named ATPChecker to analyze the compliance of Android TPLs. ATPChecker uses static analysis to identify TPL's user data access behaviors and host apps' data interaction with TPLs, and uses natural language processing techniques to analyze TPLs' and host apps' privacy policies. Combining the results of bytecode analysis and privacy policy analysis, ATPChecker determines whether TPLs and usage of TPLs in host apps comply with the regulation.
- To evaluate the performance of ATPChecker and facilitate further research in this area, we construct a privacy dataset that includes 187 TPLs' binary files and their privacy policies, and 642 host apps and their privacy policies. Our dataset contains TPLs' privacy policies with related data access behavior. Our dataset includes the host apps' privacy policies that contain labels related to host apps' interaction with TPLs. ATPChecker's website with instructions to request access is at: https://atpchecker.github.io.
- ATPChecker discovers over 23% of TPLs miss providing privacy policies and 37% of TPLs' privacy policies conceal data usage. ATPChecker finds over 65% of host apps violate the regulation requirements for clearly disclosing data interactions with TPLs.

II. BACKGROUND

A. Android Third-party Libraries

Android TPLs provide abundant functions (e.g., user data analysis and advertising recommendations). Developers can reuse them in their apps to facilitate development progress. Although TPLs bring functionality conveniences, TPLs also import data leakage. According to Android permission mechanism, TPLs share the same privileges with host apps [19]–[21]. TPLs may abuse permissions to access users' personally identifiable information without users' consent [22], [23], which results in personal information leakage [8]–[18], [53].

Android third-party libraries are generally available as binary files, such as *.jar or *.aar. Developers mainly import binary files into their projects to use the TPLs without inspecting the TPLs' data usage, which results in the violation of regulation requirements. Furthermore, it is very time-consuming for developers to understand TPLs' data usage behavior. Thus, developers can not clearly describe the TPLs' data usage in their privacy policies or just provide links to TPLs' privacy policies [40] which may make their apps and privacy policies violate regulations and lead their apps off shelves.

B. Privacy Policy

Privacy policies are legal documents that prevent personal information from being abused [30]–[33]. Privacy policies describe how the data controllers use, disclose, store, manage and share users' personal information. Regulations require privacy policies to describe TPLs' data access behaviors clearly. Besides, the coverage of personal information [32] is not limited to identical information, such as ID, but also includes any information that can be used to identify or infer a specific person [32]. To comply with regulation requirements, privacy policies should clearly claim the following information [54]: 1) personal information, 2) the software's contact information, 3) the purpose of collecting personal information, 4) types of data shared with third parties and 5) the rights that users have.

C. Regulation Requirements for TPLs and Usage of TPLs

Regulations have enacted Articles to normalize personal information usage by software. California Consumer Privacy ACT (CCPA) [33] ARTICLE 1798.120 claims that "a business should notify consumers if they sell consumers' personal information to third parties". CYBERSECURITY PRACTICES GUIDE-LINES-SECURITY GUIDELINES FOR USING SOFTWARE DEVELOP-MENT KIT (SDK) FOR MOBILE INTERNET APPLICATIONS (APP) (SGSDK) [31], has been enacted to standardize the management of third-party libraries. For example, SGSDK ARTICLE 5.1 D) claims "The SDK discloses the scope, purpose, and rules of the SDK's processing of personal information to the App in a clear, understandable and reasonable manner. The actual behavior of the SDK's collection and use of personal information should be consistent with the statement in the public document." Similar requirements are also mentioned in GDPR [32] ARTICLE 14.2 and CCPA [33] ARTICLE 4. INFORMATION SECURITY TECHNOLOGY-PERSONAL INFORMATION (PI) SECURITY SPECIFICATION (PISS) [30] Article 9.7 specifies the requirements for third parties. Regulations [55] also enact Articles to regulate usage of TPLs. For example, regulations [30]–[32], [34], [55] require apps to disclose the purpose, method and scope of usage of TPLs. In PISS, GDPR and CCPA, TPLs are regarded as data controllers and are required to expose their data usage.

III. METHODOLOGY

This section introduces how ATPChecker identifies TPLs' data usage(§III-A) and how to identify the consistency of TPLs' data usage with the statements in privacy policies (§III-B). We will also describe how to determine whether host apps describe TPLs usage correctly in their privacy policies (§III-D) and whether host apps use TPLs correctly(§III-C). Fig. 1 shows the framework of ATPChecker.

TABLE I: Tracked data types in static analysis.

Data Type

Ad ID, username, password, name, location, contact, phone number, email address, IMEI, Wi-Fi, MAC address, GSF ID, Android ID, serial number, SIM serial number

A. Identify personal information usage in third-party libraries

ATPChecker analyzes TPL's personal information (PI) usages by performing static analysis based on *soot* [50] and does not require TPLs' source code. ATPChecker conducts data flow analysis, specifically variable use-define analysis [56], to locate data of interest (DOI) (Tab. I), which are mainly related to user identification information summarized from regulations. ATPChecker uses function call graphs (FCG) to trace PI flow among methods. However, our analysis discovers that the soot cannot effectively discover the TPL's main functions and entry points to construct a valid FCG [51]. Thus, we propose the following methods to optimize the FCG construction and improve the data flow analysis precision.

TPL FCG construction: ATPChecker iterates over each class and method. Since apks mainly use TPLs by invoking their *public* methods, ATPChecker extends TPLs *public* methods to entry points set to optimize FCG construction.

TPL DOI identification: We summarize PI from regulations [30]–[33] as listed in Tab. I. Then, we manually crawl PI-related APIs [57]. Based on those APIs, ATPChecker iterates over all statements and locates DOI with target variables. ATPChecker performs inter and intra-procedural data flow analysis to identify all PI-related statements.

Algorithm 1 sketches the TPL data usage analysis method. ATPChecker iterates over all statements in TPL to locate the target variables (var) that represent personal information listed in Tab.I. Then, ATPChecker conducts both interprocedure and intra-procedure analysis to get the data flow. For inter-procedures analysis, ATPChecker backward analyzes statement s_t in method m_t with the DOI v_t (line 1). The backward analysis locates the definition statements (defs) in m_t that relates to DOI v_t (line 11). For statements in defs, ATPChecker iterates defs and locates the variable signature of v_t in d (line 12-13). ATPChecker iterates FCG of target TPL and finds the methods ($caller_{list}$) that invoke m (line 14). For each caller m, ATPChecker locates the statements (src_{stmt}) in m that invoke m_t . ATPChecker finds the variable (src_v) in src_{stmt} that corresponds to DOI v_t (line 17). If src_v is a variable, ATPChecker continues backward analysis, starts with src_{stmt} in src_m and focuses analysis on variable src_v (line 18-19); if src_v is a constant, ATPChecker finds one piece of code that describes the data usage of var (line 21).

To locate the v_t 's data usage in m_t , ATPChecker performs intra-method analysis. Specifically, ATPChecker locates all statements (uses) that uses var in method m (line 5). For each statement u in uses, ATPChecker stores the usage of variable var (line 7) because the target variable have been used in the statement u. Then, ATPChecker use forward analysis (line 8) to identify whether var is used further. For each statement s in tar_{stmt} , ATPChecker stores the data flow describing the data usage. If s contains invoke statements, ATPChecker locates the method tar_m that calls stmt (line 28), builds the variable tar_v corresponding to target variable v_t and continues the forward analysis (line 30).

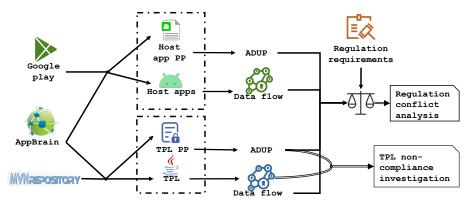


Fig. 1: Framework of ATPChecker.

B. Identify data usage statements in TPL's privacy policy

TPL privacy policy analysis aims to identify the data usage statements. The pipeline of our privacy policy analysis consists of three steps: 1) preprocessing of privacy policy, 2) named entity extraction, and 3) data usage action construction. Finally, each privacy policy is abstracted into a set of **a**bstract **d**ata **u**sage **p**atterns (ADUP) that describes *who* will (*not*) access what kinds of data with whom. Each ADUP is in form of {data_entity, action, {data_type}, {data_recipient}, {neg}}. For example, "We share your personal information with our service providers," (in Adad's privacy policy) is abstracted as {app, share, {personal information}, {service provider}, false}.

- 1) Preprocessing privacy policy: To download the apps' privacy policies from Google Play [58], we use the Selenium Webdriver [59] to open websites of privacy policies. Then, we use html2text [60] to transform downloaded privacy policies into plain text. However, the transformed plain text contains many special characters, e.g. * and |, which will lead to unnatural segmentation of sentences. ATPChecker first uses patterns [61] to eliminate special characters. Besides, privacy policies use enumeration items [41] to detail related data items, which may lead to a whole sentence being segmented by item index and further cause losing information. ATPChecker merges the items by searching for sentences ending in a colon, and the next sentence starts with list items, such as bullets, roman numerals, and formatted numbers.
- 2) Data access extraction: With preprocessed privacy policy sentences, ATPChecker analyzes each sentence to identify data access descriptions. Since the interrogative sentences are commonly used in privacy policies but do not describe the types of accessed personal information, we omit them by checking the interrogative words (i.e., who, where, when, why, whether, what, and how). For example, the sentence "What personal information do we collect" is omitted. Then, we construct the part-of-speech (POS) tagging, and dependency parsing tree (DPS) for each sentence. We will omit sentences without verb words because those sentences will not claim data access behaviors. For example, "Do-Not-Track Signals and Similar Mechanisms" in Facebook Open Source Privacy Policy only claims the title of the paragraph. For the remaining sentences, we follow the following steps to extract data action,

data entity, and data actor.

Identification of data action words. We first identify whether the verb words are in the data usage word list (Tab. III). We stem the word using *nltk* [62] to deal with English verb tenses. We also identify the modifier of the target verb because the privacy policies also claim the data they will not use or collect. To achieve this, we analyze the dependency parsing tree and recognize the words whose relation with the target verb is "advmod" (adverbial modifier) or "mmod" (modal verb modifier). If the words or their tags are negative (i.e., "neg"), we regard the data usage action as negative one. To this end, ATPChecker identifies data sharing or collection operations.

Identification of data entity. We identify objects of identified collecting and sharing words (target verb) according to DPS. ATPChecker first merges the noun phrase (NP) tag into one noun tag according to POS tagging to simplify sentence structure. For example, consider the following sentence in the privacy policy of the app video.reface.app "With the use of Google Analytics, we collect such data as IP-Address, your device model, screen resolution and operation system, session duration, your location". As only one noun or noun phrase will be identified as the object of the target verb [63], ATPChecker locates all coordinating nouns for the object. Specifically, ATPChecker iterates the constituency parsing tree, which is calculated by two stages conditional random field (CRF) model [64], to find the sub-trees whose a) root label are common noun (NN tag) or Noun Phrase (NP) or b) coordinating conjunction (CC tag) or punctuation exist in the sub-tree. The condition a) denotes that the leaves in the tree can be merged into one noun, and b) indicates there may exist enumeration items or coordinating nouns. If we omit the relations, ATPChecker cannot fully extract all data entities, i.e., false-positive occurs. To this end, we obtain all candidate data objects in each sentence.

Identification of data actor. To identify the data actor, ATPChecker analyzes DPT and locates the words whose relation with sharing and collection verbs is nominal subject ("nsubj") or direct object ("dobj"). Suppose the sentence or the object is a prepositional complement or clausal complement of a preposition ("ccomp"). We iterate the DPT to find the coordinating verb and then locate the nominal subject of the target verb. The nominal subject and the verb will be added to

Algorithm 1: Data usage analysis **Input:** method m_t , statement s_t , variable v_t **Output:** data usage FD of variable v_t 1 BackwardAnalysis (m_t, s_t, v_t) 2 IntraMethodVarAnalysis (m_t, s_t, v_t) 3 \mathbf{Def} IntraMethodVarAnalysis (m, stmt, var): 4 uses = find statements that use var in method mfor u in uses do 5 store(var, u) in DFForwardAnalysis(m, u, var)8 9 **Def** BackwardAnalysis (m_t, s_t, v_t) : $defs = getDefsOfAt(v_t, s_t, cfg)$ 10 **for** d in defs **do** 11 src_{var} = get the signature of v_t in d12 $caller_{list}$ = find methods that invoke m_t 13 14 for m in $caller_{list}$ do src_{stmt} = statements that invoke m_t in m15 src_v = variables in src_{stmt} that correspond 16 to v_t if src_v is Variable then 17 18 BackwardAnalysis(src_v , src_{stmt} , src_m) else if src_v is Constant then 19 store (v_t, src_{stmt}) in DF20 21 22 **Def** ForwardAnalysis (m, stmt, var): tar_{stmt} = find all statements that contain stmt23 for s in tar_{stmt} do 24 store (var, s) in DF25 if s contain invoke statements then 26 tar_m = method that invokes stmt in s27 tar_v = variable in tar_m that correspond to 28 ForwardAnalysis(tar_{method} , s, tar_v) 29

the actor list and the sharing/collection verb list, respectively. We also consider the data actor as users separately, under which situation the real data actor is the user rather than the supplier. For example, "we will not collect the personal information you shared with us". The data actor should be "you" while the data recipient is "us".

Post-process To eliminate false detection, e.g., conditional clauses, we design rules to avoid false data usage extractions. For sentences that start with condition or assumption hints, such as 'if' ("if you do not provide your personal information"), we will not identify the data usage pattern inside.

C. Extract host apps' interaction with TPLs

To identify whether host apps' privacy policies are consistent with their TPL usage ATPChecker conducts static analysis to identify the host apps' interaction with TPLs. ATPChecker

TABLE II: Personal information and corresponding APIs.

PI	Class Name	Method Name
Ad ID	AdvertisingIdClient	AdvertisingIdClient
Bluetooch address	android.bluetooth.BluetoothAdapter	getAddress
Camera	android.hardware.Camera	setPreviewDisplay
Cell Loca- tion	android.telephony.TelephonyManager	getCellLocation
Contact	android.provider.ContactsContract	PhoneLookup
	android.location.Location	getLatitude
	android.location.Location	getLongitude
GPS Location	android.location.LocationManager	getLastKnownLocation
	android.location.LocationManager	requestLocationUpdates
	android.location.LocationManager	getLongitude
Sim Num- ber	android.telephony.TElephonyManager	getSimSerialNumber
IMEI	android.telephony.TElephonyManager	getDeviceId
IMSE	android.telephony.TElephonyManager	getSubscriberId
TimeZone	java.util.Calendar	getTimeZone
MAC ad- dress	android.net.wifi.WifiInfo	getMacAddress
Password	android.accounts.AccountManager	getPassword
Phone Number	android.telephony.TelephonyManager	getLine1Number
SMS	android.telephony.SmsManager	sendTextMessage
SSID	android.net.wifi.WifiInfo	getSSID
User Cre- dential	android.accounts.AccountManager	getAccounts
UserName	android.os.UserManager	getUserName

discloses what kinds of PI data (Tab. I) are shared with TPLs. ATPChecker uses Flowdroid [51] to construct FCG of apps. Since Flowdroid optimizes Android app analysis process [51], ATPChecker directly uses the FCG constructed from Flowdroid. ATPChecker performs the data flow analysis (§III-A) to find the PI related data flow. To identify TPLs, ATPChecker identifies whether the statement contains the TPLs' name or package name or not. After obtaining TPLs and PI data, we identify whether the method exists in the data flows. Besides, we optimize the signature of method invocation (SMI) using the invoking statement. ATPChecker matches the SMI in both PIs' data flow and TPLs' data flow. Once the SMI is matched between TPL_i and PI_i , ATPChecker regards the host app sharing the PI_j with the TPL_i . If the SMI only exits in PI_i 's data flow, ATPChecker identify that the host app collects PI_i without sharing it with TPLs.

D. Identify TPLs usage statements in host apps' privacy policy

To identify the TPL usage statements in host apps, we extract two descriptions from the privacy policy: a) the *data* sharing related statements and b) TPL-related descriptions. The *data sharing* related statements claim how the app dis-

TABLE III: Data sharing and collecting words.

Action Type	Keywords
Collect	access, check, collect, gather, know, obtain, receive, save, store, use
Sharing	accumulate, afford, aggregate, associate, cache, combine, convert, connect, deliver, disclose, distribute, disseminate, exchange, gather, get, give, keep, lease, obtain, offer, post, possess, proxy, provide, protect against, receive, rent, report, request, save, seek, sell, share, send, track, trade, transport, transfer, transmit

closes users' personal information under which situations. For example, the app (flipboard.boxer.app) claims that "We share personal information with vendors and service providers that help us offer and improve our service". The statement indicates that flipboard.boxer.app will share users' personal information with vendors and service providers. If ATPChecker also identifies the app's data flow sharing users' data with TPLs tagged as vendors or service providers, ATPChecker regards the app's privacy policy as consistent with its behavior.

After preprocessing TPLs' privacy policies (§III-B1), we use NLP methods [63] to get the tokenization, POS tagging and DPS for each sentence. For sentences with verbs, we check whether the verb is in *sharing* word list (Tab. III). After obtaining the data sharing verb, we identify the data recipient to determine which TPL the data are shared with. Specifically, we iterate the words in the sentence. If the word is the object of a preposition (pobj) or an indirect object (iobj) of the verb, we identify the words as candidate data recipients, i.e., TPLs. For enumeration patterns, once we identify the sentence that a) starts with a noun or noun phrase (denoted as tar_{TPL}) that is involved in our TPL list, v) the noun ends with colon following only noun or noun phrases, we regard the noun (phrases) following colon as the shared data with tar_{TPL} .

E. TPL privacy compliance investigation

ATPChecker investigates TPL privacy compliance by performing *normativeness analysis*, *privacy policies legality analysis*, and *privacy non-compliance transmissibility analysis*.

Normativeness analysis identifies whether TPL provides privacy policies. According to GDPR Article 12(1) and Article 13(1), TPLs, who act as the data controller, or third party of personal data, should infer users about data access behaviors in a concise, transparent, intelligible and easily accessible form. Legality analysis identifies conflicts between TPLs' behavior and privacy policy statements. Specifically, ATPChecker identifies whether TPLs' data access actions are clearly claimed in their privacy policies by combining the data flow results (§III-A) and PP ADUP (§III-B). If ATPChecker identifies data usage in TPL data flow results are not mentioned in data_types of ADUP set, the TPL will be regarded as violating legal requirements.

Privacy non-compliance transmissibility analysis checks to what extent the TPLs (TPL_v), whose privacy policies violate the regulation requirements, affect other TPLs or apps. ATPChecker summarizes artifacts that use TPL_v from *Maven Repository* to investigate the impact of TPL's privacy non-compliance. Specifically, ATPChecker crawls *Usages* information in *Maven Repository* to count the number of artifacts that use TPL_v .

F. Regulation issue analysis

Regulation conflict analysis discovers whether the usage of TPLs in host apps comply regulation requirements. Two kinds of conflict will be identified:

• ATPChecker identifies whether usage of TPLs from data flow analysis (§III-C) is clearly claimed in their privacy policy

TABLE IV: List of TPLs without Privacy Policies.

PL Categories TPL Name		Reasons	
Ad Network	Fractional Media	NOS	
Au Network	YuMe	NOS	
Cooled librory	Smack API	NPOS	
Social library	Twitter4j	NPOS	
Development Tool	Android In-App Billing Library	GNP	
	Apache Commons Codec	NPOS	
	Apache Commons I/O	NPOS	
	Apache Commons Lang	NPOS	
	Apache Commons Logging	NPOS	
	Apache Http Auth	NOS	
	Apache HttpMime API	NOS	
	Apache James Mime4j	NPOS	
	Apache Thrift	NPOS	
	AChartEngine	GNP	
	FasterXML Jackson	GNP	
	Android ViewBadger	GNP	
	Kin	GNP	
	Material App Rating	GNP	
	OpenStreetMap tools for Android	GNP	
	Android GIF Drawabl	GNP	
	Crouton	GNP	
	Google GData client	GNP	
	Google Guava	GNP	
	Google gson	GNP	
	HttpClient for Android	GNP	
	JSON.simple	GNP	
	greenDAO	NPOS	
	libgdx	NPOS	
	Material DateTime Picker	GNP	

NOS: No Official webSite; NPOS: No Privacypolicies on Official webSite; GNP: Github project without Privacypolicies

statements (§III-D). ATPChecker investigates whether the TPL package names in data flow analysis match the *data_entity* or *data_recipient* in ADUP of host app privacy policy results.

• ATPChecker discloses whether the host apps clearly state their data interaction with TPLs. ATPChecker identifies whether the apps' TPL interaction behavior (§III-C) is clearly stated in host apps' privacy policies (§III-D).

IV. EVALUATION

We evaluate the performance of ATPChecker by answering the following research questions:

RQ1: Normativeness Analysis of TPLs. How many TPLs provide privacy policy documents?

RQ2: Legality Analysis of TPLs. Do TPLs' privacy policies meet regulation requirements, and do TPLs' privacy policies correctly claim data usage actions?

RQ3: Host apps behavior analysis. Whether do host apps conduct privacy data interaction with TPLs?

RQ4: Legality of host app's privacy policies. Whether do host app's privacy policies comply with requirements for disclosure of TPL usage?

A. RQ1: Normativeness Analysis of TPLs.

Experimental Setup. This research question evaluates all Android TPLs listed in AppBrain [49] including three types: Ad networks, social libraries, and development tools. The list gives the TPLs that are widely used by top 500 installed apps in Google Play. The data set contains 458 TPLs that include 141 ad networks, 25 social libraries, and 292 development

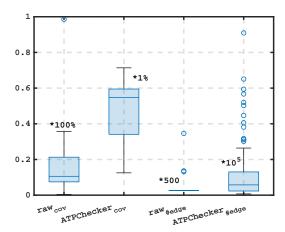


Fig. 2: Evaluation of function call graph construction.

tools. Then, we gather the privacy policies of those TPLs by visiting the homepage provided by each TPL information page on AppBrain. We manually crawl information of TPLs whose homepages are not provided. For TPLs in Github or Bitbucket, we visit their public repositories and check whether privacy policies are provided. During visiting the homepage of TPLs, we search the homepage with keywords, such as *privacy*, *policy*, *legal* and *policies*, to find potential privacy policy links on the homepage. Besides, we also manually check whether policy links are given in the typical layout [65], such as the bottom of the website. Finally, we collect 201 unique privacy policies as some TPLs are built by the same companies or developers.

Results. According to regulation requirements (§II-C), data controllers should clearly disclose their data usage in privacy policies. This research question discloses whether TPLs satisfy the requirements of regulations, i.e., do TPLs correctly provide privacy policies. With the TPL list and privacy policies, ATPChecker discovers that 2 of 141 Ad network TPLs, 2 of 25 social libraries, and 103 of 292 development tools TPLs do not provide privacy policy websites. We find that some TPLs are created by individual developers and released on GitHub [66]. We manually crawl their privacy policies for GitHub repositories. Tab. IV summarizes partial TPL names and the reasons that the TPLs do not provide privacy policies. Tab. IV demonstrates that 16 of 22 TPLs that do not provide privacy policies are published as Github repositories (GNP). Five TPLs without privacy policies miss official websites (NOS), and the left does not provide privacy policy documents on their websites (NPOS). For development tool TPLs, we also observe that 66 TPLs from Google Inc. share the same privacy policy [67] that may lead to over-claiming the personal information usage for specific TPLs. For nine TPLs from Apache, six TPLs (6/9) do not provide privacy policies and two TPLs' (2/9) websites are Not Found.

Answer to RQ1: ATPChecker reveals 23% TPLs do not provide privacy policies. Over 14% TPLs from the same company provide one general privacy policy.

B. RQ2: Legality Analysis of TPLs.

Experimental Setup. We collect the resources of TPLs from Maven Repository [48] based on the TPL list from AppBrain (§IV-A). We manually crawl TPL binary files from Maven Repository by searching the TPL's name in Appbrain's list and finally get 187 different TPLs including 85 "aar" and 102 "jar" files. More specifically, we get 45 ad networks, 132 development tool libraries and 10 social libraries.

Results. ATPChecker discloses whether the TPLs' privacy policies satisfy the regulation requirements by comparing TPLs' binary files analysis results (§III-A) and privacy policies analysis results (§ III-B). ATPChecker analyzes TPLs' privacy policies and obtains the ADUP of personal information usage-related statements. ATPChecker identifies personal information in the TPL through static analysis (§III-A). Finally, ATPChecker matches the consistency between AUDP and personal information.

TPL privacy policies analysis. ATPChecker analyzes privacy policy documents of 187 TPL whose binary files and privacy policies are both available. We analyze 42,895 sentences with sharing and collection (SAC) words, and each privacy policy has an average of 420.5 sentences and 136 SAC words. Among sentences with SAC words, 19,750 sentences start with 5W1H (who, why, when, whether, what, how) words that are considered as data usage actions. Besides, 1,654 sentences only vaguely state that the TPL will collect personal information without specific data types. For example, com.xiledsystems only claims "We collect your personal information in order to provide and continually improve our products and services," but no specific personal information is given. In data usagerelated actions, ATPChecker analyzes the personal information that is mostly used by TPLs. Fig. 3 shows the times that are mentioned in TPLs' privacy policies. It can be observed that contact is the most used personal information. This may be caused by the fact that, by getting contact, the TPLs can easily expand and prompt their services. Account, address and email are the second most popular data mentioned in TPLs' privacy policies. Among the statements that claim to collect accounts, addresses, and email, 21.13% of sentences claim that they collect related data for contacting users. For example, one of them claims that "we will use your email, phone number, or other contact information you provide us by written or oral means for contacting you and providing you with the services and information that you request".

TPL data usage analysis. As the basis of data flow analysis, we first evaluate the effectiveness of ATPChecker in improving the FCG construction performance. We analyze TPLs' FCG quality through comparing the a) FCG coverage and b) the number of edges between the raw FCG built by soot and our optimized FCG. FCG coverage is calculated by:

$$cov_{FCG} = \frac{\#Nodes_{FCG}}{\#Nodes_{TPL}},\tag{1}$$

where $\#Nodes_{FCG}$ is the number of nodes (methods) in FCG and $\#Nodes_{TPL}$ is the total number of TPLs' methods. Fig. 2

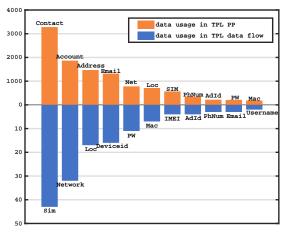


Fig. 3: Popularity of data types that are used in TPLs' data flow and PP.

illustrates the box plots of ATPChecker's performance in optimizing FCG construction, and the number at the top of boxes denotes measuring units of the data for better illustration. Fig. 2 demonstrates that ATPChecker's FCG coverage achieves an average performance of 55%, while the FCG coverage of raw FCG only achieves an average of 0.34%, which means it nearly fails to construct the FCG of TPLS. $raw_{\#edge}$ denotes the raw FCG only contains the 159 average edges, while the $ATPChecker_{\#edge}$ shows the improved FCG can extract 12,960 edges. The results indicate that the soot nearly fails to analyze the FCG of TPLs, and ATPChecker optimizes construction performance and improves the FCG quality.

ATPChecker analyzes the data usage of TPLs to identify the consistency with their privacy policy statements. ATPChecker analyzes the data flow of TPLs and discovers that 65 out of 187 TPLs access users' personal information. ATPChecker identifies 146 data usage from 2,396 traces. Among data usage behavior, 31 out of 146 invokes Android APIs (such as "android.telephony.TelephonyManager: java.lang.String getSimSerialNumber()") to access Android Sim Serial number. Fig. 3 shows the data frequencies that are mostly used in TPLs' data flow (shown in orange color). It can also be observed that TPLs' privacy policies tend to disclose non-identical information, such as contact, while their actions tend to access identical information.

ATPChecker identifies the compliance of TPLs by combing the privacy policies analysis results and data flow analysis results. Specifically, ATPChecker identifies how many TPLs comply with regulations by identifying whether the PI in data flow is also mentioned in ADUP. ATPChecker concentrates on 65 TPLs that access users' personal information identified by ATPChecker and discovers that 24 out of 65 (37%) TPLs violate the regulation requirements, i.e., the TPLs collect at least one PI without clearly disclosing them in privacy policies. *Investigation on perniciousness of TPLs' non-compliant behavior*. After identifying TPLs that do not satisfy the regulation requirements, we also identify the harm of TPLs' non-compliant behavior on a large scale. TPLs may integrate other TPLs to enhance their functionalities or facilitate usability [2]. Thus,

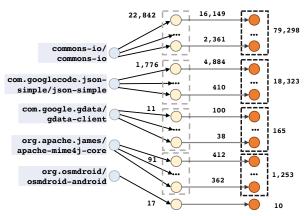


Fig. 4: TPL Privacy Policy Non-compliance Propagation. The first column is raw TPLs identified by ATPChecker that potentially violate regulation requirements. The second column is TPLs affected by raw TPLs and the number above the arrow is the number of TPLs infected by raw TPLs. The third column is TPLs affected by the TPLs in the second column.

once one TPL (TPL_v) violates the regulation, other artifacts integrated TPL_v may spread the threats and make their privacy policies violate regulation requirements. To expose the impacts, ATPChecker analyzes the dependencies among TPLs. Specifically, ATPChecker crawls the TPLs (TPL_U) that use TPL_v , that are analyzed in §III-A-III-B, from Maven Repository. Then starting from TPL_U , ATPChecker crawls the list of artifacts that use TPL_U . In this way, ATPChecker investigates the propagation of TPL_v 's threats under two times integration and visualizes it in Fig. 4. ATPChecker starts analysis with 25 unconventional TPLs. Fig. 4 demonstrates the harm of that privacy policy inconsistency propagation with five selected TPLs. It can be observed that after one round of propagation, even five TPLs will affect 24,737 TPLs (25 TPLs affects extra 79,471 TPLs). After two rounds of propagation, the threats even spread to 18,323 TPLs (25 to 447,300). Fig. 4 also demonstrates that not only the popular TPLs demonstrate infective (be widely used by other TPLs), such as "common-io/commons-io", some minority TPLs, such as "com.google.gdata/gdata-clien" are directly used by only 11 TPLs. After two rounds of propagation, the number of TPLs they affect increases exponentially. This observation indicates that developers should pay attention to the usage data of TPLs, especially the functions that are related to privacy.

Answer to RQ2: ATPChecker identifies over 37% TPLs miss disclosing their data usage in privacy policy documents. ATPChecker investigates that the perniciousness of privacy policy non-compliance harms spread exponentially.

C. RQ3: Analysis of host apps' interaction with TPLs

Experimental Setup. We collect the host apps of TPLs from AppBrain to investigate host apps' interaction with TPLs. We gather the host app list using the mapping relations between host apps and used in-app TPLs provided in AppBrain. We can access the top ten installation host app list for each TPL

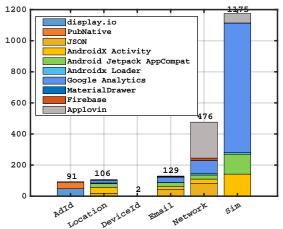


Fig. 5: Statistics of host apps' data interaction with TPLs.

and then download the apps. Finally, we gather a total of 642 distinct apps because some apps may use multiple TPLs and one TPL can be used by different apps.

Results. ATPChecker uses data flow analysis to investigate whether host apps conduct personal information interaction with TPLs and what kinds of PI are shared with TPLs. ATPChecker analyzes 642 distinct apps. However, limited to computation resources and flowdroid's capacity, we finally successfully analyzed 354 apps while 174 out of 642 apps are in the form of ".xapk" [68] which cannot be analyzed by flowdroid and 114 out of 642 apps cannot be analyzed because some apps apply protection methods and some apps are too large which exhaust our computation resources. ATPChecker identifies over 52.8% (187 out of 354) host apps share PI with TPLs. ATPChecker measures the suspicious behavior by counting the times of PI-related invocations in apps' data flow and traces 2,216 times data-sharing behaviors with TPLs and finds that over 53.1% traces share users' sim serial number with TPLs such as "Google Analytics". Although "Google Analytics" is a well know TPL that provides users abundant Google services, the sharing of sim serial number is sensitive to identify one individual. Fig. 5 shows the top five data shared by host apps with TPLs. Fig. 5 shows that the secondary data the host app need to share with TPLs is network status, as TPLs may connect the server to provide services, like advertising or data analytics. ATPChecker also observes that "Google Analytics" is the TPL that accesses the most PI from host apps. Although "Google Analytics" provides abundant functionalities, such as gmail and music, TPLs should avoid collecting information like SIM serial number that is easy to identify an individual and provide privacy policies to state the purpose of data access. TPLs should not ask for unnecessary data which out of the scope of their services [30]-[33].

Answer to RQ3: ATPChecker identifies that over 52.8% of host apps share personal information with TPLs. Among shared PI, sim serial number accounts for over 53.1% of traces in identified user data access actions. ATPChecker also discovers that while well-known TPLs provide rich functionalities, they also request personal information.

D. RQ4: Host apps privacy policy analysis.

Experimental Setup. We also collect the privacy policy of host apps to analyze whether the apps' data usage behavior is consistent with the privacy policies. For each host app in our dataset, we get its privacy policy by crawling the homepage from Google Play. To evaluate the performance of ATPChecker, we collect extra 256 apps, which can be successfully analyzed, and corresponding privacy policies. Then, one expert and one senior researcher in software engineering and privacy policy analysis manually label the privacy policies.

Results. ATPChecker identifies whether host apps' privacy policies comply with regulation requirements concerning descriptions about TPLs by analyzing whether privacy policies disclosure their usage and interaction with TPLs. ATPChecker implements this by integrating the static analysis results and privacy policy analysis results. ATPChecker identifies a) whether apps integrate TPLs in their code without disclosure in privacy policies and b) whether apps conduct data interaction with TPLs without descriptions. We select extra 256 apps that can be successfully analyzed and evaluate the identification performance. To annotate the privacy policies, one expert and senior researcher, who have conducted research on privacy policy and software engineering for over seven years and two years respectively, manually label the sentences that include data usage, TPL usage, and data interaction with TPLs. The annotation process is conducted in an in-house manner [69], [70] that guarantees the quality and agreement of the labels.

ATPChecker identifies 65.63% (168/256) apps violating regulation requirements, i.e., their privacy policies miss disclosing TPL usage in their privacy policies. ATPChecker identifies over 25% privacy policy's user data access conceal behavior is related to the TPL, i.e., "Alipay SDK Java". This may lie in the fact host apps only use the TPL for payment and do not use the TPL for user data access behavior. Even so, host apps are still required to claim TPL usage in their privacy policies [31]. Among concealed data interaction with TPLs, the most popular PI data, that the app interacts with TPL but not discloses in the PP, are device ID, mac address, and sim serial number, which account for 95.82% (321/335) conflicts.

To this end, we also evaluate the performance of AT-PChecker. We evaluate the eight metrics (i.e., true-positive, true-negative, false-positive, false-negative, accuracy, recall, precision, and F1-score) concerning the identification performance of ATPChecker on a) identifying the mis-disclosure of TPLs in host apps' privacy policies and b) identifying the mis-disclosure of PI interaction with TPLs (Tab. V). The true positive denotes that ATPChecker's detection is consistent with manual checks. For example, ATPChecker identifies the usage of TPLs being claimed in privacy policies and our manual check also identifies the same conclusion. To calculate the metrics, we manually labeled host apps' privacy policies related to TPL usage and PI interaction with TPLs. It is not easy to access the ground truth of host apps sharing what kinds of PI with which TPL. We can only identify the existence of the identified TPL list or PI interaction with

TABLE V: Evaluation of ATPChecker for identifying host apps' compliance.

	TP	TN	FN	FP
TPL_list	95	0	0	9
TPL_data	223	/	/	12
	Accuracy	Precision	Recall	F1
TPL_list	0.91	0.91	1	0.95
TPL_data	/	0.95	/	/

TPLs in privacy policies. Thus, we can only identify the false-positive rate of host apps' data interaction with TPLs, i.e., the detected usage in apps' code is not disclosed in privacy policies. Tab. V demonstrates that ATPChecker achieves 95% F1 score for identifying used TPL in apps and privacy policies, and achieves 95% accuracy for identifying apps' PI interaction with TPLs.

Answer to RQ4: ATPChecker identifies over 65% of apps comply with regulations requirements for disclosing data interaction with TPLs.

V. DISCUSSION

ATPChecker our system is designed to identify the compliance between TPLs' behavior and privacy policies, and host apps' TPL usage and privacy policies. TPLs are mainly used as an additional part of apps to enhance app functionalities and may not be responsible for data access behaviors or work in the role of data controllers as defined in GDPR. However, we can not assume all TPLs only conduct user data access behavior for assisting apps. Existing work [6], [71], [72] has demonstrated that development tool TPLs, such as firebase [6], may leak users' privacy without developers' consciousness. Besides, regulations, such as GDPR Article 35 and SGSDK Article 5.3, request clearly giving the purpose of data processing. Even if we could assume TPLs only access user data for specific functionalities and would never share or collect the data, we still recommend TPLs provide privacy policies to clearly state their user data access behavior and related purpose. This can not only help app developers better understand TPL's functionalities but also help TPL developers suffer from legal disputes. Thus, we assume all TPLs should provide privacy policies when evaluating ATPChecker. Next, we discuss the limitation of ATPChecker, threats to validity and future work.

A. Limitations

ATPChecker is designed to identify whether TPLs' personal information usage complies with regulations and whether host apps' TPL usage complies with regulations. ATPChecker is limited to analyzing TPLs and corresponding privacy policies under the version we collect the data and documents. TPLs' functionalities keep changing with the update of the TPL versions. It is still available to trace TPL versions from Maven Repository, but not easy to trace the privacy policy of corresponding versions. Besides, ATPChecker is built upon static

analysis (i.e., soot and flowdroid). ATPChecker cannot handle some dynamic behaviors of TPLs (e.g., reflection, dynamic class loading) and it cannot process large apk [51] files due to the limited memory space. Furthermore, ATPChecker cannot handle host apps in the format of xapk which is created by Apkpure [68]. Besides, TPL non-compliance identification research is still limited to large-scale labeled data sets. We only crawl the TPL list and the top 10 host apps from AppBrain as the role of academic researchers. It is very laborious to label privacy policies and ground truth of data usage in software and privacy policies. Besides, ATPChecker are limited to predefined patterns and string matching to identify the statements and TPL usage in collected privacy policies. ATPChecker will fail detection once those adversaries target our detection tool and conduct adversarial attacks [7], [73] using novel patterns to hide their data usage statements. Besides, ATPChecker is currently designed to analyze the Android TPLs excluding those native libraries.

B. Threats to Validity

(I) The first threat comes from the language used in privacy policies, it is not trivial to identify and switch the language of privacy policy during the collecting phase, which may lead to missing collection of some privacy policies. As TPLs or apps are published in different countries, such as China or Korea, the default language used in the privacy policy website is provided using their native language. (II) Another threat comes from inconsistent versions of TPLs and their privacy policies. Notice that all our data is collected from Feb-2022 to Apr-2022. There may be cases where the TPL or app functions have been updated, but the privacy policies have not been updated in time. This can lead our system to misidentify that the behavior of the software is inconsistent with the privacy policy and violates regulation requirements. We will mine software and privacy policy version issues in future work.

C. Future work

To further improve ATPChecker, we will integrate analyzing the data collection purpose into ATPChecker. When analyzing privacy policies of TPLs or apps, ATPChecker analyzes data usage-related statements but is limited to analyzing the purpose. During our analysis of privacy policy documents, we believe that purpose descriptions can help researchers 1) better understand the code or functionalities and 2) more precisely understand whether apps violate regulation requirements. In future work, we will investigate more information and integrate them into ATPChecker. Furthermore, writing legal privacy policies remains a challenging and time-consuming work for TPL developers. Automatic privacy policy generation methods are under urgent needs. Although there existing privacy policy generation methods [54], [74] for APKs, those methods are not suitable for generating privacy policies for TPLs. In future work, we will develop automatic TPL privacy policy generation methods by combing regulations requirements analysis [31]–[33], natural language processing methods [70] and TPL analysis techniques.

Privacy Policy Conflict Identification. XFinder [44] identifies the cross-library data harvesting in Android apps with dynamic analysis. XFinder identifies third-party libraries' usage by comparing the caller's and callee's package names. XFinder also restores reflection invocations using two predefined patterns. For conflict identification, XFinder manually parses the term-of-service of 40 TPLs and then uses NLP techniques to extract data sharing policies. Nguyen et al. [43] investigate whether apps achieve users' consent before sharing personal information. The authors use dynamic analysis to identify the network traffic and data sharing behaviors. They identify whether the shared data are identifiable personal data by comparing the same traffic collected from different times or the same traffic from different devices. The ablation experiments are designed to determine whether the data-sharing action achieves users' explicit consent.

PAMDroid [27] analyzes the impact of misconfigurations of analytic services in Android. After analyzing 1000 popular apps, PAMDroid finds 52 of 120 apps misconfigure the services and lead to a violation of either the service providers' term-of-service or the app's privacy policy. PPChecker [40] also identifies the conflict in apps' privacy policies, but only identifies whether apps' privacy policies provide TPLs' privacy policy links and interactions of five permission related personal information with 81 TPLs. POLICHECK [39] identifies the app's data sharing with third parties using dynamic analysis. POLICHECK finds that 49.5% of apps disclose their third-party sharing practices using vague terms and 31.1% of data flows as omitted disclosures. Existing works ignore analyzing whether TPLs satisfy the regulation of requirements.

TPL data leakage identification. Razaghpanah et al. [75] detect third-party advertising and tracking service using dynamic analysis. They use dynamic analysis to identify the advertising and tracking services. Specifically, they use a free app, namely Lumen Privacy Monitor, to collect all network traffic generated by all apps installed on the device. With limitations of Lumen, the proposed system can only identify limited personally identifiable information and unique identifier, e.g., IMEI. He et al. [76] use dynamic analysis to analyze the invocation path between predefined source and sink to identify the privacy leakage of third-party libraries. Their system only concentrates on Android permission-related personal information. Their experiments on 150 popular apps demonstrate that their proposed dynamic methods achieve realtime detection and 97.4% accuracy. Ekambaranathan et al. [77] concentrate on children's apps data usage and disclosure. The researchers conduct surveys and interview with app developers to understand why apps disclose children's personal data. Liu et.al. [78] analyze the data leaking of nine analytics libraries in 300 apps. They conduct static and dynamic analyses to mitigate the privacy risk caused by analytics libraries.

VII. CONCLUSION

We propose an automatic third-party library regulation compliance checker system, namely ATPChecker. ATPChecker is designed to identify whether TPLs satisfy regulation requirements, i.e., whether TPLs provide privacy policies and correctly claims their data usage, and whether host apps correctly disclose their usage and data interaction with TPLs. ATPChecker discovers that over 23.4% TPLs incorrectly provide the privacy policies, 37% TPLs do not disclose all of their data usages, and over 65.64% apps miss disclosing their personal information interaction with TPLs. Besides, ATPChecker also analyzes the harm and impact of such data breaches at large-scale TPLs.

VIII. DATA AVAILABILITY

We make our dataset and tool publicly available to facilitate research in this area. We release the code and data to other researchers by responsibly sharing a private repository. The project website with instructions to request access is at: https://atpchecker.github.io/. Besides, our data set is constructed by gathering publicly available privacy policy websites and apps without posing any ethical problems.

IX. ACKNOWLEDGMENT

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