Personalised Privacy Policies

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**privacy policy** is a legal document (according to privacy laws) that discloses how (personal) data is -

a) gathered  
b) used  
c) disclosed  
d) managed
Reading the Privacy Policies You Encounter in a Year Would Take 76 Workdays  - Alexis C. Madrigal - The Atlantic - Mar 1, 2012

THE REAL COST OF PRIVACY

Median length of a privacy policy: 2,518 words
Average time to read that policy: 10 minutes
Number of privacy policies you encounter in a year: about 1,462
Number of work days it would take to read those: 76
Number of hours it would take US users to read them: 53.8 billion

Hypothetical national opportunity cost of reading privacy policies:

$781 billion
then came GDPR...

GDPR, which became enforced from 25th May specifies additional rights and obligations for information to be provided by the controller to the data subject before collecting happens.
Soon after 25th May...

Current state of my inbox:

We’ve updated our privacy policy.
We’ve updated our privacy policy.
We’ve updated our privacy policy.
We’ve updated our privacy policy.
We’ve updated our privacy policy.
We’ve updated our privacy policy.
...

4:15 AM - 26 Apr 2018 from Dublin

7,684 Retweets 30,125 Likes

Update to our Terms of Service and Privacy Policy

As we continue to improve Twitter’s products and features, we’ve also been working on improving our Terms of Service and Privacy Policy.

Our Terms of Service are now easier to read and better organized, which should help users worldwide. Our Privacy Policy has been updated to include a section on the EU-US Privacy Shield program. In addition, we’ve updated and clarified how various services have changed over time. For example, we’ve included adding additional information on non-public communications, using multiple accounts, logged out access, and our advertising services. Feel free to learn more about this in the Help Center.

Please take a moment to read our Terms of Service and Privacy Policy, and keep in mind that by using our services on or after September 30, 2016, you agree to the revisions. Thanks for using Twitter.

- Twitter

“Personalised Privacy Policies” at TELERISE2018  http://openscience.adaptcentre.ie/
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GDPR says...

Provide *specific* information to the user about how *their* data is being collected, used, stored, and shared.

Exactly what data?  
How is it collected?  
Shared with whom?  
Stored for how long?

- Only for me i.e. Data Subject  
- Not common to everyone  
- Not generalised
But the Privacy Policy still says...

a) we “may” collect your data  
b) we “may” store your data  
c) we “may” use your data  
d) we “may” share your data

Q: Are you collecting data?  
A: Yes. No. “Maybe”.

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http://opencode.adaptcentre.ie/  
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Personalised Privacy Policies at TELERISE2018

Represent the system as a model of steps and artefacts.
Resolving Ambiguity

A meta model of the system

Analysis of Privacy Policies

E.g. Airbnb Ireland

Section

Sub-Section

Policy → Data Collection → legal basis

Source

Data Subject

Third Party

legitimate purposes

opt-in/voluntary

given by user

collection mechanism

automatic

Section

field

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Privacy Policy

This privacy policy is part of a research project (see openscience.adaptcentre.ie) and is made available under the CC-by-4.0 license.

This privacy policy was derived from the policy provided by Airbnb Ireland (archived copy available here).

This Privacy Policy describes how we collect, use, process, and disclose your information, including personal information.

Information We Collect

There are three general categories of information we collect.

1.1 Information You Give to Us.

1.1.1 Information that is necessary for provision of services

We ask for and collect the following personal information from you when you use our service. This information is necessary for the adequate performance of the contract between you and us and to allow us to comply with our legal obligations. Without it, we may not be able to provide you with all the requested services.

○ Account Information When you sign up for an account, we require certain information such as your first name, last name, email address, and date of birth.
○ Profile and Listing Information To use certain features, we may ask you to provide additional information, which may include your ID address, phone number, and a profile picture.
○ Identity Verification Information To help create and maintain a trusted environment, we may collect identity verification information (such as images of your government issued ID, passport, national ID card, or driving license, as permitted by applicable laws) or other authentication information.
○ Payment Information To use certain features of the such as booking, we may require you to provide certain financial information (like

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1. Systematic representation of privacy policy metadata
2. Can generate privacy policy when system changes
3. Automation of policies
4. Structured metadata
5. Better for Data Subjects (more information available)
6. Metadata is also useful for compliance purposes
TWO approaches - do it myself, or automate

A. Manually
   i) complex
   ii) requires legal clarity for concepts
   iii) time consuming

B. Automate
   i) faster
   ii) difficult to implement
   iii) can scale to large number of policies
Future Work - More Annotations

1. Method
   - annotate
   - serialize → ontology
   - model metadata

2. Test
   - compare with right to data portability
   - compare with methods that extract data from policies

3. Demo
Future Work - Demo

1. Define model
2. Convert to metadata
3. Generate privacy policy

Privacy Policy

Data subject: Harshvardhan J. Pandit
Data collected: name, email, age, address
Reccomend data: name, email
Optional data: address, age
Applicable consent: provided on 02-06-2018
Data used in process:
1. Registration - Recover name, email
2. Marketing - Optional, provided consent
3. Analytics - we do not use your data for analysis unless you did not provide consent.

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Q: Are all privacy policies structured similarly?
Ans: No. A large number of them are, but others are similar in structure.

Why?

Q: Will companies adopt this measure?
Ans: Unlikely. Unless it becomes legally mandated. But this can be useful in other domains.

Q: Where is your implementation?
Ans: Work-in-progress! More details?

Q: Will it become a law?

Will it become a law?