

From: Jolienne Rutter
Sent: Monday, November 19, 2007 3:03 PM
To: Behavioral Advertising Comments

Subject: Comments Regarding FTC ehavioral Town Hall - Nov. 1-2, 2007

Dear Commissioners and FTC Staff,

My colleague, Dr. Sandeep Krishnamurthy (University of Washington), and I have put together a very interesting and relevant powerpoint presentation that addresses both the key elements that impact the decision to click on the Internet Privacy Policy as well as the reality of what consumers face once they decide to click.

The results of the first study are currently under review at the Journal of Marketing and have been presented at the 2007 Marketing and Public Policy Conference. The second study has just been completed and will be prepared for peer review shortly.

After listening to the webcast of the recent FTC ehavioral sessions on Nov 1-2, 2007, it was apparent that most online entities acknowledge the importance of privacy, but little was resolved in terms of taking real steps toward changes in the corporate attitude toward the fundamental importance of this issue in light of new, and even more profitable ways to use consumer information. 'Privacy speak' was the talk of the day, but real change was lacking.

At the time of this seminar, the second study in the presentation was being compiled. In it you will find that if users want to send a simple email to websites to resolve or clarify privacy concerns -- (websites were specifically asked 1) if they share personal info collected on the site? and with whom? and 2) can personal information on the site be permanently deleted?) - consumer centric privacy policies and responsive sites are the exception, not the rule.

Websites say they care, but from this study you will see that is generally an empty statement.

In a very recent development, Channel 4 news out of the UK has televised a [situation](#) in which a user attempted to permanently delete their account on [Facebook.com](#). Although the individual was permitted to deactivate their account, the information remains on Facebook's servers indefinitely. This specific question was posed to over 105 popular US websites in our second study, as detailed in the attached powerpoint presentation. The results were poor - with most not even willing to address this issue.

The reports states, "We asked the Information Commissioner's Office, which oversees the implementation of the Data Protection Act. They promised to investigate our viewer's complaint. And gave us this statement: "Many people are posting content on social

networking sites without thinking about the electronic footprint they leave behind. It is important that individuals consider this when putting information online. However, it is equally important that websites also take some responsibility. In particular they should ensure that personal information is not retained for longer than necessary especially when the information relates to a person who no longer uses the site."

Dr. Krishnamurthy and I would like to contribute to the current efforts to address consumer privacy at the FTC. While government regulation is premature, the pressure that the FTC places on websites is very important to ensuring that data use is respectful of individual privacy preferences, consumers make informed choices, and when information is collected it's use is controlled to prevent mass transfers of information to untold companies severing the connection between where the consumer provided the data and where is it used.

We hope that you will consider the results of these studies in your analysis and look forward to discussing this further.

Thank you,

Jo Rutter, PhD

Before and After The Click



[Privacy Policy](#)

The Credibility Gap



*Manager's Perception of Privacy Protection
(Internal)*



Legal Requirement of Privacy Protection

*Customer's Perception of Privacy Protection
(External)*

Overview of Research Results

❑ Study 1: Before the Click

- ❑ Experimental study of the factors that impact the decision to click on the Internet Privacy Policy (IPP) link.

Motivation + Ability = Click

❑ Study 2: After the Click

- ❑ Once a user clicks on the privacy policy link, what do they encounter in the IPP? If websites suggest they care about a users privacy, what happens when the user submits a simple online inquiry about privacy practices of the website? Quantitative study of 105 IPP characteristics, response rate and quality of response.

Consumer centric privacy policies and responsive websites are the exception not the rule

Quantitative Empirical Research

Study 1: Online Experiment

Goal: Understand how motivation, opportunity and ability to process privacy information effect the decision to click on the Internet privacy policy link.

- Sample: 437 valid non-student respondents.
- Respondents obtained from email lists and invitation posts on web forums.
- Data collected from Sept – Nov 2006.
- Respondents exposed to realistic retail website related to dog product purchases – www.doggie.com
- Respondents provided with \$5 online gift card or option to donate \$5 to Humane Society of the United States.

Demographics

Representative Sample:

Corresponds well with national averages.

USC Center for Digital Future (2007)

Newspaper Association of America Online Consumer Study (2002)

US Census Data (2003)

Hartz National Survey (2005)

	Frequency		
	<u>Respondents</u>	<u>%</u>	<u>Mean</u>
Total	439 **		
Gender	Male	130	29.6%
	Female	309	70.4%
Age *	20 - 29	84	19.1%
	30 - 39	129	29.4%
	40 - 49	134	30.5%
	50 - 59	70	15.9%
	60 - 69	18	4.1%
	>= 70	4	0.9%
Frequency of Online Purchases in Last Three Months	>= 50	4	0.9%
	40 - 49	92	21.0%
	30 - 39	91	20.7%
	20 - 29	92	21.0%
	10 - 19	66	15.0%
	5 - 10	32	7.3%
	1-5	9	2.1%
	Never	53	12.1%
Ave \$ of Last Three Online Purchase	Never	4	0.9%
	\$ 0 - \$25	88	20.0%
	\$26 - \$50	155	35.3%
	\$51 to \$100	116	26.4%
	\$101 to \$150	33	7.5%
	\$151 to \$200	18	4.1%
	>= \$201	25	5.7%
Education	< High School	0	0.0%
	Some High School	13	3.0%
	High School Grad or Eq	71	16.2%
	Some College	142	32.3%
	College Graduate	151	34.4%
	Some Graduate School	24	5.5%
	Completed Graduate Degree	38	8.7%

* Age groups <= 19 were removed from sample

** Two respondents removed (final sample 437) due to standardized residuals greater than 2.258 (p<=.01)

Quantitative Empirical Research

- Scales:
 - Ability To Process Privacy Information (ABILITY) (KR -20 = 0.759)
 - Motivation to Process Privacy Information (MPPI) – Cronbach Alpha = .812
 - Strong reliability in both scales.
- Number of privacy-related mentions in response to open-ended questions - secondary motivation measure (PRIVACYSTMT)
 - What excites you most about online shopping?
 - What can be done to make the future of e-commerce brighter?
 - What would need to happen for you to shop more online?
- Opportunity Construct Manipulation - placed privacy policy link at top/bottom (TOPBOT) of page and used large/small font (FONT).

Qualitative Response Highlights



- What excites you most about shopping online?
 - Convenience
 - No lines
 - Discreteness
 - The ease and speed that it can be done
 - The immediate satisfaction of the purchase and no lines to wait in
 - Finding the best price
 - Many options
 - Not having to leave my home, finding better prices, delivery to my door
 - I can do it anytime!
- What can be done to make the future of e-commerce brighter?
 - Lower shipping costs
 - Finding great deals
 - Keep it tax free
 - Live support
 - More payment options
 - Better search capabilities
 - Easier to navigate websites
 - Better credit card security measures, more education about that security and privacy
 - Better identity safety and security
 - Let people know that they can trust their information will not be misused
 - Trustworthy
 - Show how safe it is
 - I would actually prefer fewer, more trustworthy sites
 - The protection of our personal information
- What would need to happen for you to shop more online?
 - More bargains
 - More choices, better product descriptions
 - Lower shipping costs
 - Increased protection
 - Having more confidence that e-commerce is safe and secure
 - I would say more theft security. I always feel kind of uneasy putting my credit card number online
 - More payment options
 - Identity theft would be guaranteed against
 - Hit the lotto!

Quantitative Results: Study 1

Independent Variables	β	S.E. β	Wald χ^2	df	p	e^β (odds ratio)
MPPI	.085	.02	18.382	1	.0001	1.088
TOPBOT	-.366	.224	2.665	1	.103	.694
FONT	.229	.223	1.062	1	.303	1.258
ABILITY	.262	.067	15.139	1	.0001	1.299
PRIVACYST MT	.563	.154	13.396	1	.0001	1.757
Constant	-5.81	.909	40.786	1	.0001	.003
<i>Overall Model</i>						
<i>Evaluation:</i>						
Likelihood ratio			56.66	5	.0001	
Score test			51.678	5	.0001	
<i>Goodness-of-fit test:</i>						
Hosmer - Lemeshow			11.420	8	.179	



Motivation and Ability are strong predictors of the decision to click

Implications

- Informed choice starts with targeting and enhancing consumer motivation and ability.
- Ability results suggest that consumers are relying on government protections that, in actuality, don't exist:
 - 40% answered TRUE : Internet privacy policies are required by law
 - 20% answered TRUE: A website must get their privacy policy reviewed by the government on an annual basis
- Privacy behavior instigators must be addressed to ensure new disclosures and design formats are effective.

Email Survey Study 2

105 Top Websites were contacted via an email and asked the following two questions tailored to the specific website type, such as the one below:

I would like to (buy products, register a profile, open an account) on your website. It looks great. But I have some concerns about my privacy and security on xyz.com. I have read your privacy policy, but some items are still unclear to me. First, if I no longer want to use your website, is there a way I can permanently delete my personal information? How? Also, will you share my information (name, address, profile, credit card (if app)) with another company? If so, who? Thanks for your help with these. Sometimes I get worried about putting all my private information on the net and these answers will help me understand your policy better.

Data collected from Oct – Nov 2007

Results Overview

Study 2

		<u>Contact</u>	<u>Average</u>	<u>Average</u>	<u>Response Rate</u>	<u>3rd Party Seals</u>
		<u>Ease</u>	<u># Wds in IPP</u>	<u>FKGL</u>		
Total Number of Sites Polled	105					
Social Networking	20	70%	2556	13.82	50%	15%
Search Engine	20	65%	2176	13.07	26%	30%
Employment	20	70%	1485	13.61	55%	10%
Retail	20	75%	2188	13.03	70%	25%
Financial	20	25%	2019	12.97	90%	5%
Children - Social Networking	5	100%	2262	14.62	60%	20%
Percentage with IPP	98%					
Percentage with IPP link at bottom of page	87.4%					

How easy to contact

How easy to read

Use of privacy seals

Length of the IPP

Customer care

IPP – Internet Privacy Policy

Contact Ease- Percentage of IPP's with link to email or online form within privacy policy

Average # Wds. IPP = Ave number of words in privacy policy (high/low indicated in yellow)

Average FKGL = Flesch Kincaid Grade Level – Ave grade level reading measure (high/low indicated)

Response Rate = Return rate of privacy inquiry requests

Truste/BBBonline = Percentage of sites that employ accreditation seals (yes indicated)

Most Responsive Sites

Websites That Provided Responses to Both Questions		
Social Networking youtube.com friendster.com xuga.com blackplanet.com xanga.com hi5.com livejournal.com	Employment careerbuilder.com monster.com collegegrad.com careerjournal.com manpower.com gojobs.com	Kids Social Networking clubpenguin.com Total 20 sites Rate 19.1%
Search Engine NONE	Retail cduniverse.com nike.com	

AND

19.1% of sites answered both questions posed

None of the websites provided a list of the companies with which they share personal information.

Interesting Observations

- The hardest sites to contact via the privacy policy were financial websites, which often collect the most personal information.
- A 2000 word privacy policy is approximately 4-6 pages of single-spaced reading.
- The longest privacy policies were from social networking sites and the shortest were from employment job sites.
- The hardest policies to read were the kids social networking sites and the easiest were the financial websites.
- Only 19% of the sites answered both questions posed in the email.
- The financial sites had the highest response rate at 90%, despite not answering both questions, compared to the search engine sites in which only 26% responded.
- The easiest privacy policy to read, with a grade level of 8.8, was at www.chase.com. The hardest one to read, with a grade level of 16.1 was www.manpower.com.
- The use of third party accreditation does not have widespread adoption, with only 17.1% of sites using these seals. The most popular seal program was Truste. BBBonline was most popular with retail sites; yet, only 3 were using this seal program.

Social Networking Privacy Policies

Website	Contact Method	Contact Ease	# Wds in IPP	FKGL	Response Time (Days)	TrustE	BBBOnline	Share	Perm Delete
myspace.com	privacy@myspace.com	Internal	1616	16.5	5	no	no	n/a	yes
youtube.com (b)	onsite form	Internal	820	13.2	no response	no	no		
facebook.com	privacy@facebook.com	Internal	3540	13.7	0	yes	no	yes	yes
digg.com	abuse@digg.com	Internal	2126	11.6	no response	no	no		
photobucket.com	support@photobucket.com	Internal	2041	15.4	no response	no	no		
match.com	privacy@match.com	Internal	1638	13.4	no response	no	no		
friendster.com	help@friendster.com	External	1991	12.6	0	no	no	no	yes
livejournal.com	privacy@livejournal.com	Internal	2511	15.0	19	no	no	no	yes
linkedin.com	privacy@linkedin.com	Internal	2844	13.2	3	yes	no	n/a	yes
xuqa.com	feedback@xuqa.com	Internal	2723	12.5	1	no	no	no	yes
typepad.com	privacy@sixapart.com	External (a)	2515	15.1	no response	no	no		
stumbleupon.com	onsite form	Internal	2680	14.5	no response	no	no		
blackplanet.com	membersafetyteam@mail.blackplanet.com	Internal	2427	12.9	3	no	no	no	yes
classmates.com	privacy@corp.classmates.com	Internal	4538	14.9	no response	yes	no		
xanga.com	online form	Internal	4863	13.7	3	no	no	no	yes
friendwise.com	online form	External	no privacy policy		1	no	no	no	n/a
bebo.com	online form	External	1878	12.4	no response	no	no		
hi5.com	online form	External	1984	14.8	0	no	no	no	yes
tagged.com	sitesquad@tagged.com	Internal	2910	14.0	no response	no	no		
reunion.com	online form	Internal	2917	13.1	no response	no	no		

Sites With Direct Link to Submit Privacy Inquiry	→	70%
Average No. of Words in IPP / Grade Level Syntax	→	2556 13.8
Response Rate	→	50%
Third Party Accreditation Seal	→	15%
Responses That Addressed Sharing Personal Info	→	80%
Responses That Addressed Permanently Deleting Personal Info	→	90%

(a) Email address in privacy policy is undeliverable
(b) Number of words in youtube.com IPP does not include reference to Google privacy policy

Contact Ease- Internal (link is in IPP) / External (link is elsewhere on site)
Wds. IPP = Number of words in privacy policy (high/low indicated)
FKGL = Flesch Kincaid Grade Level – Grade level reading measure (high/low indicated)
Truste/BBBOnline = indicates if site employs accreditation seals (yes indicated)
Share – Addressed issue of sharing of personal information in response email, n/a indicates issue not addressed
Perm Delete – Addressed issue of permanently deleting info in response email, n/a indicates issue not addressed

Search Engine Privacy Policies

Website	Contact Method	Contact Ease	# Wds in IPP	FKGL	Response Time (Days)	TrustE	BBBOnline	Share	Perm Delete
yahoo.com	online form	External	1481	13.3	0	yes	no	n/a	yes
google.com	online form	Internal	525	12.9	no response	no	no		
aol.com	privacyquestions@aol.com	Internal	2500	15.3	4	no	no	yes	n/a
go.com	ms_support@help.go.com	Internal	6441	15.8	no response	yes	no		
ask.com	privacyhelp@help.ask.com	External	3197	13.9	no response	no	no		
mininova.com	staff@mininova.org	External	76	10.8	no response	no	no		
msn.com	online form	Internal	385	11.5	1	yes	no	n/a	n/a
dogpile.com	privacy@infospace.com	Internal	1992	13.5	1	no	no	n/a	yes
snap.com	customerservice@snap.com	Internal	1441	13.4	no response	no	no		
webmd.com	online form	External	8061	13.8	7	yes	no	no	n/a
healthatoz.com	info@healthatoz.com	Internal	2143	11.5	no response	yes	no		
hotbot.com	privacy@lycos.com	Internal	5618	13.6	no response	yes	no		
helia.com	info@helia.com	External	675	10.8	no response	no	no		
gigablast.com	support@gigablast.com	External	no privacy policy		no response	no	no		
healthline.com	online form	External	1500	14.4	no response	no	no		
mayoclinic.com	online form	Internal	1853	12.5	no response	no	no		
dmoz.org	staff@dmoz.org	Internal	330	11.0	no response	no	no		
info.com	contact@info.co.uk	Internal	413	15.3	no response	no	no		
mamma.com	online form	Internal	2189	15.0	no response	no	no		
shadowsurf.com	support@shadowsurf.com	Internal	524	10.1	no response	no	no		

Sites With Direct Link to Submit Privacy Inquiry	→ 65%
Average No. of Words in IPP / Grade Level Syntax	→ 2176 13.07
Response Rate	→ 26%
Third Party Accreditation Seal	→ 30%
Responses That Addressed Sharing Personal Info	→ 40%
Responses That Addressed Permanently Deleting Personal Info	→ 40%

Contact Ease- Internal (link is in IPP) / External (link is elsewhere on site)

Wds. IPP = Number of words in privacy policy (high/low indicated)

FKGL = Flesch Kincaid Grade Level – Grade level reading measure (high/low indicated)

Truste/BBBOnline = indicates if site employs accreditation seals (yes indicated)

Share – Addressed issue of sharing of personal information in response email, n/a indicates issue not addressed

Perm Delete – Addressed issue of permanently deleting info in response email, n/a indicates issue not addressed

Employment Privacy Policies

Website	Contact Method	Contact Ease	# Wds in IPP	FKGL	Response Time (Days)	TrustE	BBBOnline	Share	Perm Delete
careerbuilder.com	online form	External	1883	13.7	2	no	no	no	yes
monster.com	privacystatement@monster.com	Internal	3542	14.7	2	yes	no	no	yes
bankjobs.com	contact@bankjobs.com	Internal	2851	15.1	no response		no		
momcorps.com	info@momcorps.com	Internal	529	10.7	1	no	no	no	n/a
execu-search.com	info@execu-search.com	Internal	2553	13.0	no response		no		
dice.com	privacy@dice.com	Internal	2639	15.5	no response		no		
indeed.com	online form	Internal	513	12.9	1	no	no	no	n/a
job.com	online form (a)	External	567	12.1	no response		no		
vault.com	feedback@staff.vault.com	Internal	2458	13.8	no response		no		
snagajob.com	info@snagajob.com	Internal	394	15.6	0	no	no	n/a	n/a
employmentguide.com	webmaster@employmentguide.com	Internal	705	13.7	no response		no		
quintcareers.com	online form	Internal	339	12.3	no response		no		
jobs.com	none (b)	External	824	12.1	no response		no		
collegegrad.com	online form	Internal	540	10.4	0	no	no	no	yes
sciencejobs.com	online form	External	721	14.7	no response		no		
jobbankusa.com	online form (a)	External	803	15.2	no response		no		
net-temps.com	pr@net-temps.com	Internal	2725	12.4	no response	yes	no		
careerjournal.com	online form	Internal	1865	14.0	0	no	no	no	yes
manpower.com	data.privacy@na.manpower.com	Internal	732	16.1	1	no	no	no	yes
gojobs.com	online form (a)	External	2512	14.1	0	no	no	no	yes
Sites With Direct Link to Submit Privacy Inquiry			→	70%					
Average No. of Words in IPP / Grade Level Syntax			→	1485	13.6				
Response Rate			→			55.0%			
Third Party Accreditation Seal			→					10%	
Responses That Addressed Sharing Personal Info			→					88%	
Responses That Addressed Permanently Deleting Personal Info			→					63%	
(a) Email address in privacy policy is undeliverable									
(b) No email address or online form provided on site									

Contact Ease- Internal (link is in IPP) / External (link is elsewhere on site)

Wds. IPP = Number of words in privacy policy (high/low indicated)

FKGL = Flesch Kincaid Grade Level – Grade level reading measure (high/low indicated)

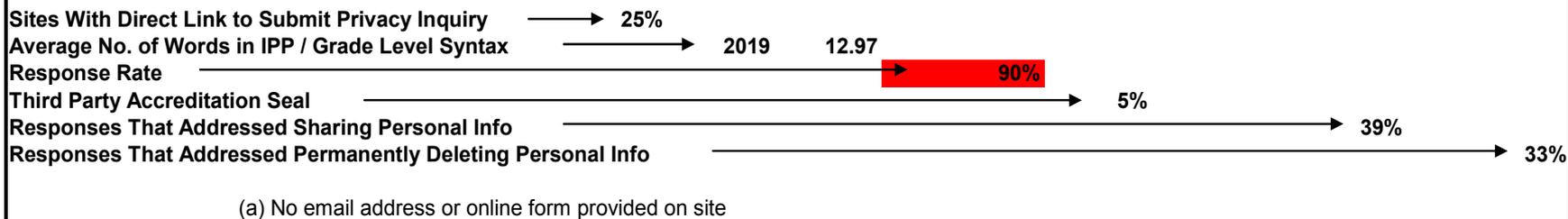
TrustE/BBBOnline = indicates if site employs accreditation seals (yes indicated)

Share – Addressed issue of sharing of personal information in response email, n/a indicates issue not addressed

Perm Delete – Addressed issue of permanently deleting info in response email, n/a indicates issue not addressed

Financial Privacy Policies

Website	Contact Method	Contact Ease	Wds in IPP	FKGL	Response Time (Days)	TrustE	BBBOnline	Share	Perm Delete
bankofamerica.com	online form	External	1222	13.1	0	no	no	n/a	n/a
chase.com	online form	External	1191	8.8	0	no	no	n/a	n/a
paypal.com	online form	Internal	1783	12.5	2	yes	yes	n/a	n/a
wamu.com	online form	External	2127	13.2	1	no	no	yes	n/a
capitalone.com	abuse@capitalone.com	External	2020	12.4	1	no	no	n/a	n/a
wachovia.com	online form	External	2040	14.0	0	no	no	n/a	n/a
citibank.com	online form	External	1625	14.0	1	no	no	n/a	n/a
americanexpress.com	Anti.Phishing.Team@aexp.com	External	1843	13.9	0	no	no	n/a	n/a
visa.com	askvisacorporate@visa.com	Internal	1986	13.2	1	no	no	n/a	n/a
hsbc.com	online form	External	3295	14.2	3	no	no	no	yes
usbank.com	1800usbanks@usabank.com	Internal	5726	13.5	2	no	no	no	n/a
wellsfargo.com	online form	External	1200	11.1	0	no	no	n/a	n/a
discovercard.com	none (a)	External	1795	13.3	no response	no	no		
westernunion.com	privacy@westernunion.com	Internal	1198	12.3	0	no	no	n/a	yes
commerceonline.com	online form	External	1988	14.2	3	no	no	no	yes
mastercard.com	none (a)	External	935	12.9	no response	no	no		
charlesschwab.com	privacy@schwab.com	Internal	4781	12.4	2	no	no	no	yes
fidelity.com	online form	External	1571	13.4	1	no	no	no	yes
salliemae.com	online form	External	1499	12.9	2	no	no	n/a	n/a
scottrade.com	support@scottrade.com	External	555	14.0	1	no	no	no	yes



Contact Ease- Internal (link is in IPP) / External (link is elsewhere on site)
 # Wds. IPP = Number of words in privacy policy (high/low indicated)
 FKGL = Flesch Kincaid Grade Level – Grade level reading measure (high/low indicated)
 Truste/BBBOnline = indicates if site employs accreditation seals (yes indicated)
 Share – Addressed issue of sharing of personal information in response email, n/a indicates issue not addressed
 Perm Delete – Addressed issue of permanently deleting info in response email, n/a indicates issue not addressed

Kids – Social Networking Privacy Policies

<u>Website</u>	<u>Contact Method</u>	<u>Contact Ease</u>	<u>Wds in IPP</u>	<u>FKGL</u>	<u>Response Tim (Days)</u>	<u>TrustE</u>	<u>BBBOnline</u>	<u>Share</u>	<u>Perm Delete</u>
webkins.com	support@webkins.com	Internal	1305	14.3	no response	no	no		
clubpenguin.com	online form	Internal	1477	14.4	2	no	yes	no	no
zwinky.com	privacy@help.zwinky.com	Internal	3911	14.8	no response	no	no		
neopets.com	privacy.neopets@neopets.com	Internal	2194	15.4	1	no	no	n/a	n/a
millsberry.com	online form	Internal	2421	14.2	6	no	no	n/a	n/a

Sites With Direct Link to Submit Privacy Inquiry	→ 100%
Average No. of Words in IPP / Grade Level Syntax	→ 2262 14.6
Response Rate	→ 60%
Third Party Accreditation Seal	→ 20%
Responses That Addressed Sharing Personal Info	→ 33%
Responses That Addressed Permanently Deleting Personal Info	→ 33%

Contact Ease- Internal (link is in IPP) / External (link is elsewhere on site)

Wds. IPP = Number of words in privacy policy (high/low indicated)

FKGL = Flesch Kincaid Grade Level – Grade level reading measure (high/low indicated)

Truste/BBBOnline = indicates if site employs accreditation seals (yes indicated)

Share – Addressed issue of sharing of personal information in response email, n/a indicates issue not addressed

Perm Delete – Addressed issue of permanently deleting info in response email, n/a indicates issue not addressed

Study 2

Response Email Examples



CAREERBUILDER.COM

Thank you for contacting CareerBuilder.com. My name is Levent and I will be assisting you with your privacy concerns today. We are committed to protecting our users' privacy and do not sell our users' email addresses to advertisers. Please read the following excerpt from our Privacy statement:

"We do not sell our users' personal information to anyone for any reason if the user has indicated a desire for us to keep the information private. When posting jobs and resumes, our users decide for themselves how much contact information they wish to display. (We enable private communication for those who choose to hide this information.) All users should be aware, however, that when they voluntarily display or distribute personal information (such as their email address or resume), that information can be collected and used by others. This may result in unsolicited messages from third parties for which CareerBuilder.com is not responsible. Also, you may have arrived at this Web site by following a link from a CareerBuilder.com newspaper affiliate or other affiliate. If so, please be aware that CareerBuilder.com may share your information with that affiliate and the affiliate may use the information consistent with its privacy policy instead of this one..."

If you would like to view our privacy statement as its entirety please copy and paste this bar into your browser window:

<http://www.careerbuilder.com/JobSeeker/Info/Privacy.htm>

Hi Marisa,

I can certainly understand your concerns about your personal information.

Please understand that any and all information that Nike collects is not shared or sold to any outside organization. It is used only for Nike Nike.com. At any time you can call and ask us to delete your information from Nike.com.

Please note that there are two instances where we would not be able to delete your information:

- 1 - if you place an order online at Nike.com, we will keep the order on file. We can delete to profile that is attached to the order, but we must keep that order on file.
- 2 - if you apply for a job with Nike online at NikeBiz.com, we can not delete your job candidate profile.

Hopefully you find this information helpful.

NIKE.COM

Please let me know if you have any additional questions.

We appreciate your concern for this matter. Please note that it is highly unlikely that Facebook will ever use any material that you have uploaded to the site. It is even more unlikely that we would use this material or license this material for the financial gain of Facebook. For legal reasons, we must keep the following clause in our Terms of Use to protect ourselves from possible litigation:

"By posting User Content to any part of the Site, you automatically grant, and you represent and warrant that you have the right to grant, to the Company an irrevocable, perpetual, non-exclusive, transferable, fully paid, worldwide license (with the right to sublicense) to use, copy, publicly perform, publicly display, reformat, translate, excerpt (in whole or in part) and distribute such User Content for any purpose on or in connection with the Site or the promotion thereof, to prepare derivative works of, or incorporate into other works, such User Content, and to grant and authorize sublicenses of the foregoing. You may remove your User Content from the Site at any time. If you choose to remove your User Content, the license granted above will automatically expire, however you acknowledge that the Company may retain archived copies of your User Content."

Additionally, all users retain the copyright for any information they post on the site and all users must obey all applicable copyright laws in any use of the information on the site, including in downloading or printing any materials.

I hope that this clarified any questions you may have had regarding material that you post on Facebook.

If you deactivate, your account is removed from the site. However, we save all your profile content (friends, photos, interests, etc.), so if you want to reactivate sometime, your account will look just the way it did when you deactivated. If you do want your information completely wiped from our servers, we can do this for you. However, you need to remove all profile content before we can do this. Once you have cleared your account, let us know and we'll take care of the rest.

Thanks for contacting Facebook,

FACEBOOK.COM

Study 2

Study 2 Implications

- Privacy policies are very difficult to read and clearly are not directed at key adoption age groups (15-25 years old), many who do not even have the requisite reading levels.
- Very few websites provide any information on the specific companies with which they share private information.
- It is not possible for someone to read the privacy policies of all the sites they visit, at lengths over 2,000 words each, consumers are left hoping that nothing happens.

While websites say they care, it is often very hard to simply contact a site via email to resolve privacy concerns.

Where Do We Go From Here?

- Study 1: We know when people are motivated and can generally understand basic privacy information, they are more likely to click on the IPP link.
- Study 2: Websites say they care, after all they provide a detailed privacy policy, but it is hard to read and difficult to make a simple email request if you have privacy concerns.

Just Make It Easier!

- [Direct Email Link](#) – Given the current infrastructure and website layout, when a user clicks on the privacy policy link, provide a very simple way for them to send an email or fill out a form to resolve any concerns they have. **RESPOND!**
- [Behavioral Marketing](#) – Complex programs can determine who a person is, their interests, likes, friends, places they visit on the web, etc. – but they can't determine if they are a privacy concerned user? Of course they can. Based on the profile and activity of a user, which tap into a user's motivation and ability to process privacy information, websites can provide targeted information at key points in the purchase/use decision making process. This information will only appear if the person either explicitly expresses an interest or appears to be a privacy concerned user. **MARKET PRIVACY!**
- [Active Presentation](#) – Users have limited time to refresh their knowledge of each websites privacy policy. Send an email with any updates, or on an annual basis as a reminder for those that have registered their email with the website. Sites such as Paypal.com, Ebay.com and Scottrade.com have started to do this. Remind users, through email, about Internet safety and privacy options and the steps you are taking to address these concerns. **EMAIL ME!**
- [Shorten It Up](#) – Do you really think users have to read over 2,000 words to understand the privacy intentions of a website? Focus on the key privacy concerns, use layered policies and summary charts, and don't waste time on providing detailed definitions. Legal minefields can exist in too much detail, as well as too little. **GIVE ME A BREAK!**
- [Public Service Website](#) – Create a public service website that provides definitions, addresses concerns and options as a consortium of sites banded together to promote informed consumer choice about privacy. See timetotalk.org or drugfree.org (over 1 million visitors per month) as examples. Government regulation will hamper Internet growth and be compliance costly (while hard numbers don't exist about the benefits of privacy disclosures, the costs of increased government regulation are very high). Be proactive about informing consumers about online privacy and security. **DON'T LET THE GOVERNMENT DECIDE!**



GOOD GRIEF, THE MAN NEXT DOOR IS STARING AT ME THROUGH HIGH-POWERED BINOCULARS.

SLANE

Researchers

Jolienne Rutter has broad experience in all aspects of public and private operations and financial leadership. She is currently a privacy consultant focused on understanding the effects of marketing privacy practices and is actively engaged in current research pursuits. She has served as a Co-founder of an Internet start-up in the travel industry which was sold to a large competitor. As an auditor, she has managed and directed audit teams throughout the United States, in industries that include retail Internet, financial services\banking, real estate, hotels, construction and government agencies. She has served as a member of the Enforcement Division of the US Securities and Exchange Commission and the executive management team of a community bank. Jolienne has a PhD (Business Administration), MBA (Finance) and BBA (Accountancy) and is a Certified Public Accountant. You can access her by email at rutterjo@gmail.com

Study 1 was performed in conjunction with Sandeep Krishnamurthy, Associate Professor of E-Commerce and Marketing at the University of Washington, Bothell. He studies the impact of the Internet on businesses, communities and individuals. He is the author of a successful MBA E-Commerce textbook- “*E-Commerce Management: Text and Cases*” and has edited two books, “*Contemporary Research in E-Marketing: Volumes I, II*”. His academic research has been published in journals such as *Organizational Behavior and Human Decision Processes (OBHDP)*, *Marketing Letters*, *Journal of Consumer Affairs*, *Journal of Computer-Mediated Communication*, *International Marketing Review*, *Business Horizons*, *Marketing Management*, *Marketing Research*, *Knowledge, Technology & Policy*, *Technovation* and *Quarterly Journal of E-Commerce*. He has served as the Associate Book Review Editor of the *Journal of Marketing Research* and a co-editor of a Special Issue of the *International Marketing Review* on E-Marketing. He has appeared in several major media outlets (TV- MSNBC, CNN, KING5 News; Radio- KOMO 1000, Associated Press Radio Network; Print- Inc, Seattle Post Intelligencer, The Chronicle of Higher Education, UW's The Daily; Web- MSNBC.com, Slashdot.org). You can access his web site at- <http://faculty.washington.edu/sandeep>.