

Visually Enhanced Privacy Policies

Privacy Icons etc.

Christian Laux



CDO Roundtable
25 June 2021

The Problem



Privacy Notice

Versions:

LAST UPDATED: NOVEMBER 2, 2020

California residents: Please visit our [California Supplemental Privacy Notice](#) for more information on our privacy practices.

1. Introduction

This Privacy Notice applies to all the products, services, websites and apps offered by SurveyMonkey Inc., SurveyMonkey Europe UC, SurveyMonkey Brasil Internet Eireli, Usabilla BV, and other SurveyMonkey affiliates (collectively "SurveyMonkey"), except where otherwise noted. We refer to those products, services, websites, and apps collectively as the "services" in this notice. Unless otherwise noted in your contract, our services are provided by SurveyMonkey Inc. inside of the United States, by SurveyMonkey Brasil Internet Eireli inside of Brazil, and by SurveyMonkey Europe UC everywhere else.

References to "data" in this Privacy Notice will refer to whatever data you use our services to collect, whether it be survey or questionnaire responses, data collected in a form or application, or data inserted on a site hosted by us – it's all your data! Reference to personal information or just information, means information about you personally that we collect or for which we act as custodian.

If you want to identify your data controller please see the ["Who is my data controller"](#) section below.

For a quick snapshot of how SurveyMonkey treats data and personal information see our [Privacy Basics](#).

2. Information we collect

2.1 Who are "you"?

We refer to "you" a lot in this Privacy Notice. To better understand what information is most relevant to you, see the following useful definitions.

Creators: You hold an account within a SurveyMonkey service and you either directly create surveys, forms, applications, or questionnaires or you are collaborating on, commenting on, or reviewing surveys, forms, applications, or questionnaires within an account.

Respondents: You have received a survey, form, application, or questionnaire powered by a SurveyMonkey service.

Panelists: You have signed up and agreed to take surveys sent to you by SurveyMonkey on behalf of creators. We deal with panelists in an entirely separate section of our Privacy Notice, [which you can read here](#).

Visitors: You are just visiting one of our websites because you are curious, or you have heard about us from our marketing and sales channels!

2.2 Information we collect about you.

Contact Information (for example name or email address).

You might provide us with your contact information, whether through use of our services, a form on our website, an interaction with our sales or customer support team, or a response to one of SurveyMonkey's own surveys or forms.

Usage information.

We collect usage information about you whenever you interact with our websites and services. This includes which webpages you visit, what you click on, when you perform those actions, what language preference you have, what you buy and so on.

Device and browser data.

We collect information from the device and application you use to access our services. Device data mainly means your IP address, operating system version, device type, device ID/MAC address, system and performance information, and browser type. If you are on a mobile device we also collect the UUID for that device.

Information from page tags.

We use first party and third party cookies and tracking services that employ cookies and page tags (also known as web beacons) to collect data about visitors to our websites. This data includes usage and user statistics. Emails sent by SurveyMonkey or by users through our services also include page tags that allow the sender to collect information about who opened those emails and clicked on links in them. We provide more information on cookies [below](#) and in our [Cookies Notice](#).

Log Data.

Like most websites today, our web servers keep log files that record data each time a device accesses those servers. The log files contain data about the nature of each access, including originating IP addresses, internet service providers, the files viewed on our site (e.g. HTML pages, graphics, etc.), operating system versions, device type and timestamps.

Referral information.

If you arrive at a SurveyMonkey website from an external source (such as a link on another website or in an email), we record information about the source that referred you to us.

Information from third parties and integration partners.

We collect your personal information from third parties where, for example, you give permission to those third parties to share your information with us, where such information is publicly available online or through your device/browser data.

If you are a Creator, we may also collect:

Account Information

Registration information.

You need a SurveyMonkey account before you can use SurveyMonkey services. When you register for an account, we collect your first and last name, username, password and email address. If you choose to register by using a third party account (such as your Google or Facebook account), please see "Information from third parties" below.

Billing information.


If you make a payment to SurveyMonkey, we require you to provide your billing details, a name, address, email address and financial information corresponding to your selected method of payment (e.g. a credit card number and expiration date or a bank account number). If you provide a billing address, we will regard that as the location of the account holder to determine the SurveyMonkey entity with whom you contract and the sales tax, if applicable, to be applied to your purchase.


Account settings


The Problem





Voicing the Problem


 DuckDuckGo **Grade A**

This service does not track you 


No need to register 


The cookies used by this service do not contain information that would personally identify you 


IP addresses of website visitors are not tracked 


This service provides archives of their terms of service so that changes can be viewed over time 


[View All Points on Phoenix!](#)


[View Documents](#) [Visit Service](#)  DuckDuckGo Privacy Grade A


 YouTube **Grade E**

Tracking via third-party cookies for other purposes without your consent. 


This service can view your browser history 

This service may use your personal information for marketing purposes 

Reduction of legal period for cause of action 

This service gathers information about you through third parties 

[View All Points on Phoenix!](#)

[View Documents](#) [Visit Service](#)  YouTube Privacy Grade E

Early Work on it



[Privacy Bird \(privacyfinder.org\)](https://privacyfinder.org)

Early Work on it

- Back in 2007, as a student at the Stanford Cyberlaw Clinic, during my work to come up with an automated Privacy Policy Generator, I came across privacy icons.
- Together with Lauren Gelman, we were also discussing Privacy Icons, e.g. with ICLU and others.
- The Creative Commons project launched in 2001 considerably fuelled this idea.

Early Work on it

I need help selecting a license.

- 2 Confirm that CC licensing is appropriate**
I confirmed the appropriateness of CC licensing.
- 3 Attribution**
Anyone can use my work, even without giving me attribution.
- 4 Commercial Use**
Others can not use my work for commercial purposes.
- 5 Derivative Works**
Others can remix, adapt, or build upon my work.
- 6 Sharing Requirements**
Others must use the same CC license if they adapt my work.
- 7 Attribution Details**
Filling out this form is optional, but helps others attribute your work to you, and fills in machine-readable code.
Title of Work

Creator of Work ⓘ

CC BY-NC 4.0
Attribution-NonCommercial 4.0 International

This license requires that reusers give credit to the creator. It allows reusers to distribute, remix, adapt, and build upon the material in any medium or format, for noncommercial purposes only.

BY: Credit must be given to you, the creator.

NC: Only noncommercial use of your work is permitted.
Noncommercial means not primarily intended for or directed towards commercial advantage or monetary compensation.

[See the License Deed](#)

MARK YOUR WORK
Choose the kind of work to get appropriate license code or public domain marking.

Website **Print Work or Media**

If you are licensing or marking one work, paste the code next to it. If you are licensing or marking the whole page or blog, you can paste the code at the bottom of the page.

Rich Text **HTML** **XMP**

This work is licensed under **Attribution-NonCommercial 4.0 International**
© ⓘ

license abbreviation ☒ full license name ☐

Copy

Creative Commons:

Human Readable Code

instead of only

«Lawyer Readable Code»

<https://creativecommons.org/>

Early Work on it

In 2016, Lauren Gelman pushed a workshop for privacy icons (at that time, Lauren worked on this since a decade already):

- <http://cyberlaw.stanford.edu/events/privacy-icons-legal-hackathon>

Many more similar initiatives have popped up, to name some:

- <https://privacyiconsforum.eu/gdpr-data-protection-icons-and-transparency-where-do-we-stand-panel-at-the-cpdp-2020>
- <https://design.cnil.fr>

The Mozilla Project has provided very relevant thoughts for scoping purposes:

- <https://www.slideshare.net/azaraskin/mozilla-privacy-icons-project>

Impact

Apple Privacy Policy

Updated June 1, 2021

Apple's Privacy Policy describes how Apple collects, uses, and shares your personal data.

In addition to the information that you provide to Apple, Apple may collect information about you and your device, including information about your location, usage, and other activities.

You can review this information and control your privacy settings in the Settings app on your device.

Please contact Apple Support for more information about Apple's privacy practices, or visit [apple.com/privacy](#).

[Download a copy of this Privacy Policy \(PDF\)](#)

[Your California Privacy Disclosures >](#)
[Apple Health Study Apps Privacy Policy >](#)

What Is Personal Data at Apple?

+

Your Privacy Rights at Apple

+

Personal Data Apple Collects from You

+

Personal Data Apple Receives from Other Sources

+

Apple's Use of Personal Data

+

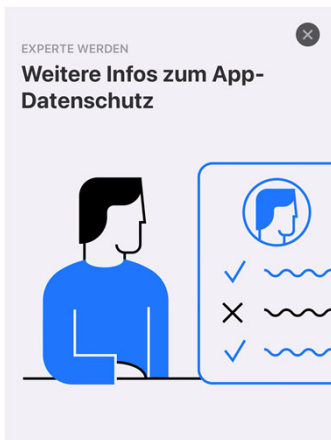
Apple's Sharing of Personal Data

+

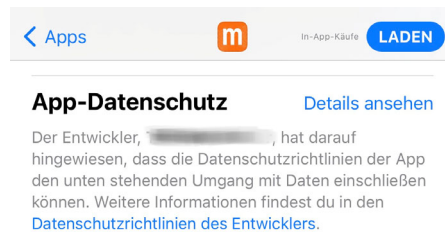
Protection of Personal Data at Apple

+

Impact



Der Abschnitt zum **App-Datenschutz** enthält Informationen über die Arten von Daten, die vom Entwickler oder seinen Drittpartnern während der normalen Nutzung der App erfasst werden können, beschreibt jedoch möglicherweise nicht alle Praktiken des Entwicklers. Die von dir erfassten Daten können auch von den in diesem Abschnitt angezeigten Daten abweichen. Beispielsweise können die erfassten Daten davon abhängen, welche Funktionen du verwendest, ob du nur eine



Mit dir verknüpfte Daten

Die folgenden Daten werden möglicherweise erfasst und mit deiner Identität verknüpft:



Gekaufte Artikel



Kennungen



Nutzungsdaten



Diagnose



Nicht mit dir verknüpfte Daten

Die folgenden Daten werden zwar möglicherweise erfasst, aber nicht mit deiner Identität verknüpft:



Suchverlauf

Die Datenschutzpraktiken variieren beispielsweise abhängig von den verwendeten Funktionen und von deinem Alter. [Weitere Infos](#)

Walks in ...

Icons als Datenschutz-
hinweise für jede und jeden



<https://privacy-icons.ch>

What it is ...

Type of personal data



No General Data

We do not process general personal data about you.



No Financial Data

We do not process your financial data.



No Health Data

We do not process your health data.



No Location Data

We do not process your location data.



No Biometric Data

We do not process your biometric data.



No Intimate Data

We do not process intimate data about you.

<https://privacy-icons.ch>

What it is ...

Source of personal data



Provided Data

We process personal data that you provide to us.



Collected Data

We process personal data that we collect about you.



Received Data

We process personal data about you that we receive from third parties.

Source of personal data



No Provided Data

We do not process personal data that you provide to us.



No Collected Data

We do not process personal data that we collect about you.



No Received Data

We do not process personal data about you that we receive from third parties.

<https://privacy-icons.ch>

Why it is relevant

- the point of having standardized icons is a common meaning
- it is like having a common language
- that is why it is relevant that privacy-icons.ch has support of large companies within Switzerland
- while it may not solve all issues, it is good to already establish a common «privacy language» within Switzerland

Why it is relevant

if we establish a common «privacy language» within Switzerland:

- we get to a common language
- we establish means to efficiently communicating about privacy
- permitting to establish a framework for assessing OK / NOK

In short: a common language translates into a **common culture**
(it is good to establish a culture of privacy within Switzerland)

How to apply this

DATENSCHUTZERKLÄRUNG

Wer wir sind und wie wir Ihre Personendaten bearbeiten

Wir sind die Lothal Datentechnik & Partner AG - spezialisiert auf Software-Lösungen für die Zeitwirtschaft und verantwortlich für die in dieser Datenschutzerklärung beschriebenen Datenbearbeitungen.

Datenschutz und Datensicherheit ist uns wichtig - genauso wie Ihr Vertrauen in unsere Software-Lösungen und Dienstleistungen. In dieser Datenschutzerklärung informieren wir Sie darüber, wie wir Personendaten (Daten, die Sie direkt oder indirekt identifizieren) erheben und bearbeiten.

Wir bearbeiten Ihre Personendaten verantwortungsvoll, in Übereinstimmung mit anwendbaren gesetzlichen Bestimmungen und gemäss dieser Datenschutzerklärung. Dabei halten wir uns an die Anforderungen des Schweizerischen Bundesgesetzes über den Datenschutz (DSG) und orientieren uns am Standard der EU-DSGVO.

<https://www.lothal.ch/kontakt/datenschutz-richtlinien>



Allgemeine Personendaten



Überlassene Daten



Erhobene Daten



Datenweitergabe



Weltweit



Weiterführende Informationen

How to apply this ...



Worum geht es?






Die Datenschutzerklärung beschreibt, wie und wozu wir Personendaten erheben, bearbeiten und verwenden. Sie können die Datenschutzerklärung hier abrufen: www.migros.ch/de/datenschutz. Sie gilt für alle Geschäftsbereiche des Migros-Genossenschaftsbunds.

Was macht die Migros für den Datenschutz?

Der verantwortungsvolle Umgang mit Kundendaten war der Migros schon immer ein wichtiges Anliegen. Seit 2002 verfügt unser Bonusprogramm Cumulus über das Datenschutz-Zertifikat Good Privacy und wird in diesem Rahmen jährlich einem unabhängigen Audit

<https://www.migros.ch/de/datenschutz.html>

How to apply this

CHATBOT	LAW FIRM	ADVISORS	CONTACT	BLOG	D // E
	MAKING THE WEBSITE AVAILABLE AND USING IT				+
	CHATBOT – BOTS ARE SMART, BUT THEY CAN FORGET				+
	WE DO NOT USE COOKIES				+
	PROCESSING FOR THE PURPOSE OF PROVIDING OUR SERVICES				+
	DATA STORAGE AND SECURITY IN THE CLOUD				+

<https://www.lauxlawyers.ch>

Moving on ...

START WHY WITH



The book cover for 'Start Why' by Simon Sinek features the title in large, bold, red letters. A black starburst graphic on the right side of the title reads 'MORE THAN ONE MILLION COPIES SOLD'.

SIMON SINEK
*New York Times bestselling author of *Leaders Eat Last* and *Together Is Better**

Do we want to tell a story?

Apple Privacy Policy

Updated June 1, 2021

Apple's Privacy Policy describes how Apple collects, uses, and shares your personal data.

In addition to this Privacy Policy, we provide data and privacy information embedded in our products and certain features that ask to use your personal information. This product-specific information is accompanied by our Data & Privacy Icon.



You will be given an opportunity to review this product-specific information before using these features. You also can view this information at any time, either in Settings related to those features and/or online at apple.com/legal/privacy.

Please take a moment to familiarize yourself with our privacy practices, accessible via the headings below, and [contact us](#) if you have any questions.

[Download a copy of this Privacy Policy \(PDF\)](#)

[Your California Privacy Disclosures >](#)
[Apple Health Study Apps Privacy Policy >](#)

07.07.2021

What Is Personal Data at Apple?



Your Privacy Rights at Apple



Personal Data Apple Collects from You



Personal Data Apple Receives from Other Sources



Apple's Use of Personal Data



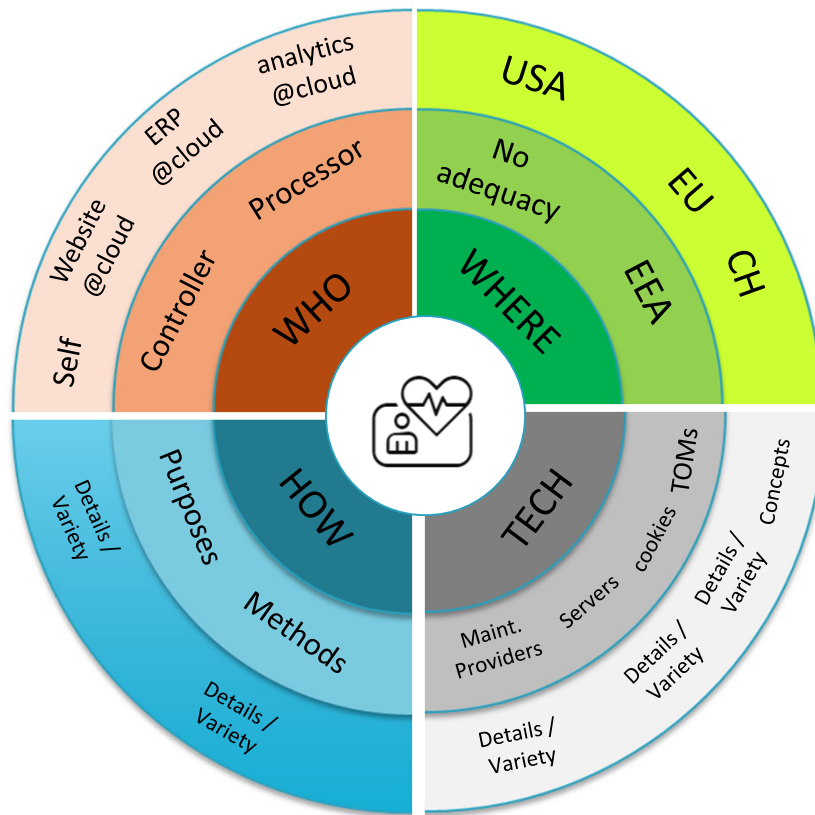
Apple's Sharing of Personal Data



Protection of Personal Data at Apple



Or be even more helpful?



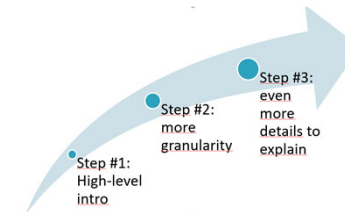
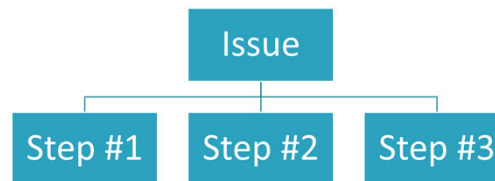
This is meant to spur further improvements to providing easy-to-digest information about certain aspects (relevance, impact, etc.) a user might want to know about data related practices of companies, etc.

Three-prong-analysis



Same as we see it with the three con-centric circles (previous slide) other three-prong graphical visualisations would be conceivable.

An example is in the left (but many more are possible). The three-step approach permits to add further granularity with every step. (Obviously, one could add a forth and a fifth layer, etc.; but there is also the experience that people get overwhelmed by too much complexity. So, one should limit oneself ...)



Kontakt



Dr. Christian Laux
Rechtsanwalt
christian.laux@lauxlawyers.ch

LAUX LAWYERS AG
<http://www.lauxlawyers.ch>

Seegartenstrasse 2
Postfach 360
CH – 8024 Zurich
+41 44 880 24 24