



The Privacy Box: A Compact Summary of Web Site Privacy Policies

www.studentaidpolicy.com/privacy-box/

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Executive Summary

There is a need for a simplified, standardized way of visually summarizing the privacy policies of a web site.

Consumers do not have the time to read the privacy policies of most web sites, which are often long and complicated. The typical privacy policy is about 9 pages long, but the lengths of some privacy policies can be much longer. For example, the Microsoft privacy policy is 51 pages long. (See Appendix B for the page length of the privacy policies of the top 50 most popular web sites.) Although this provides greater transparency, many consumers may be unwilling to read long legal documents before using a web site. The length of such privacy policies may prevent consumers from making an informed decision about the privacy tradeoffs inherent in using a web site.

Consumers do not have the time to read the privacy policies of most web sites. The Privacy Box provides a standardized way of visually summarizing the privacy policies of a web site.

This article presents the Privacy Box, a concise and compact diagram that summarizes the privacy policies of a web site. The focus of the Privacy Box is on the aspects of privacy policies that are potentially harmful to consumers.

The Privacy Box

The Privacy Box displays a web site's privacy policy in a two-dimensional grid, with types of private information in the rows and actions in the columns. If the web site performs the specified action with regard to the particular category of private information, a dot is placed in the corresponding cell at the intersection of the specified row and column in the Privacy Box. If the Privacy Box has many dots, it will appear darker, indicating that the web site has a more intrusive privacy policy.

The percentage of the cells that have a dot in them is displayed in the upper left corner of the Privacy Box, from 0% to 100%. A lower percentage corresponds to a more protective and less invasive privacy policy.

A short URL for the privacy policy is displayed below the Privacy Box, along with a telephone number and address for questions about the privacy policy. The privacy URL is standardized as the web site's domain name followed by /privacy.

See Appendix A for an example of a Privacy Box.

Actions

The columns of the Privacy Box provide information about potentially harmful actions that may be taken with regard to private information. These actions include:

1. **Collect.** Collecting private information involves the gathering of this information.
2. **Save.** Saving private information involves the storage and retention of this information for a period of time.

3. **Use.** The use of private information involves taking an action based on the information, combining the information with other data, analyzing the information or transforming the information. Examples of the use of private information include identity verification, searching for people who match a specified set of characteristics, targeting advertising and communications based on private information and predictive analytics, re-identification of de-identified data, and tracking people across visits to different web sites.
4. **Disclose.** The disclosure of private information occurs when the information is shared with or accessed by a third party.
5. **Sell.** The selling of private information is a specialized form of use or disclosure in which the use or disclosure of the information is in exchange for payment of a fee. This can include sale of data, co-registration, transmission of messages (e.g., communications by text message, tweet, post, email, postal mail or telephone) and paid advertising (e.g., inclusion of text, images, video, links and forms on a web page or in a message). It can also include fees charged for exercising control over private information, such as fees to block access to or modify the contents of private information.

The privacy box reports on actions involving the private information of individuals, not aggregate information involving a group of individuals, provided that the cell size of the aggregate information is large enough to prevent identification of individuals. For example, aggregate information might include gathering statistics on the frequency of data and associations of data. An email provider might use aggregate data concerning the frequency of spelling errors in email messages to improve the accuracy of spelling correction algorithms.

Mitigating Actions

The Privacy Box does not include actions that may have mitigating effects, such as:

- **Modify.** The modification of private information includes the addition, deletion and changing of private information. It can also include verification of private information (confirm or challenge accuracy), correction of errors and updating information that has changed.
- **Protect.** The protection of private information involves the use of security protocols to prevent unauthorized use or disclosure of the information. Protection of private information also includes backup of the information to prevent loss.
- **Log.** Logging is a form of metadata that records details concerning past actions, such as use and disclosure, of private information. A log might record who accessed which private information and when the access occurred.
- **Control.** Control of private information restricts and enables actions concerning the information. It can limit the collection, use and disclosure of private information. Do Not Track signals are an example. Consent may be specified concerning a particular action, recipient or type of private information. The ability to provide consent may be limited to individuals who are older than a specified age of consent.

The negation of absence of these mitigating actions might be seen as harmful. Examples include the failure to protect private information and the failure to allow the subject of private information to correct or delete the private information. However, the Privacy Box does not currently summarize the absence of specific components of a privacy policy.

Private Information

The rows of the Privacy Box specify types of private information. These types of private information include:

1. **Identity** (Name, Social Security Number, Date of Birth, Place of Birth, Age, Likeness, Cookies and Other Unique Identifiers)
2. **Contact Information** (Postal Address, Email Address, Telephone Numbers)
3. **Social Media** (Facebook, Twitter, Pinterest, YouTube, Blog Posts)
4. **Characteristics** (Gender, Race, Religion, National Origin, Sexual Orientation, Marital Status, Family Relationships, Adoptions, Political Affiliation, Language Fluency, Genetic Testing, Weight, Height, Hair Color, Eye Color, Skin Color)
5. **Location** (Physical Location, Locations Visited)
6. **Financial Information** (Income, Assets, Property Records, Home Ownership, Car Ownership, Application for and Receipt of Financial Aid, Accounts, Debts, Credit History, Delinquency, Default, Bankruptcy, Foreclosure, Repossession, Judgments, Liens)
7. **Medical Records**
8. **Employment Information** (Occupation, Employer, Volunteer Activities, Security Clearances, Licensing)
9. **Education Records** (Grades, Test Scores, Degrees, Certificates, Diplomas, Honors and Awards, Institutions Attended, Dates of Attendance)
10. **Criminal Records** (Arrests, Prosecutions, Convictions, Judgments, Moving Violations, Parking Tickets, Drunk Driving, Domestic Violence)
11. **Personal Records** (Contact Lists, Calendar, Messages Sent/Received/Read/Written, Documents, Presentations, Spreadsheets, Photos, Videos, Audio, Folders, Tags and Other Tools for Organizing Private Information)
12. **Activities** (Interactions with web pages, such as when you viewed the web page, clicked on a link, submitted a form, read an article, posted a comment, watched a video, saw an advertisement, clicked on the advertisement and web search query terms)

Appendix A: Example Privacy Box

The following is an illustration of a privacy box.

37%

	Collect	Save	Use	Disclose	Sell
Identity	•	•	•	•	
Contact	•	•	•	•	
Social Media					
Characteristics	•	•	•	•	
Location					
Financial					
Medical					
Employment					
Education	•	•			
Criminal					
Personal	•	•	•	•	
Activities	•	•	•	•	

www.somewebsite.com/privacy

1-800-555-1212

Appendix B: Privacy Policies of Top Web Sites

This chart shows the lengths of the privacy policies of the top 50 most popular web sites, as reported by comScore's [rankings](#) by unique visitors in February 2018.¹ Since the page length may vary depending on design and font metrics, the table reports the number of words and assumes that there are 500 words per page. The average word-count is 4,685 words, corresponding to an average page-length of 9.4 pages.

Rank	Property	# Words	# Pages	Rank	Property	# Words	# Pages
1	Google Sites	3,968	8	26	Fox News Digital Network	3,830	8
2	Oath	2,264	5	27	New York Times Digital	3,998	8
3	Facebook	2,716	5	28	Netflix Inc.	3,049	6
4	Microsoft Sites	25,261	51	29	Pandora.com	5,947	12
5	Amazon Sites	2,677	5	30	WashingtonPost.com	3,052	6
6	Comcast NBCUniversal	8,491	17	31	Vox Media	4,565	9
7	CBS Interactive	7,317	15	32	VICE Media	8,593	17
8	Meredith Digital	6,171	12	33	Disney-ABC Media	2,075	4
9	Apple Inc.	3,250	7	34	WebMD Health	6,235	12
10	Twitter	3,846	8	35	TripAdvisor Inc.	4,490	9
11	Turner Digital	4,152	8	36	Insider Inc.	2,146	4
12	Snapchat, Inc	3,276	7	37	Spotify	6,541	13
13	PayPal	5,629	11	38	ESPN	2,075	4
14	USA TODAY Network	3,127	6	39	tronc	4,333	9
15	Wikimedia Foundation Sites	6,599	13	40	Dotdash	5,796	12
16	Hearst	877	2	41	SheKnows Media	3,789	8
17	Conde Nast Digital	12,184	24	42	Reddit	2,659	5
18	Weather Company, The	4,711	9	43	Fusion Media Group	2,042	4
19	Pinterest	2,316	5	44	Dropbox Sites	1,437	3
20	Wal-Mart	4,069	8	45	Buzzfeed.com	3,765	8
21	CafeMedia	3,706	7	46	Scripps Networks	4,542	9
22	eBay	5,322	11	47	WordPress.com	3,333	7
23	Linkedin	5,136	10	48	Expedia Inc	4,334	9
24	Yelp	3,272	7	49	Groupon	4,407	9
25	Zillow Group	2,948	6	50	Cox Enterprises Inc.	3,930	8

¹ This data predates the rush to update privacy policies due to the EU General Data Protection Regulation (GDPR) becoming effective on May 25, 2018. The GDPR likely increased the length of the privacy policies on these web sites.