

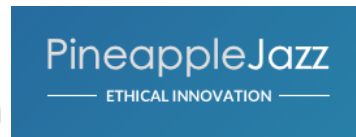


Privacy Label

SIDN Connect
28 november 2019



Platform voor de
InformatieSamenleving





Tijmen Schep

Technology Critic
&
Privacy Designer



Coen Steenhuisen

Privacy deskundige
&
Product Designer



Platform voor de
InformatieSamenleving



PineappleJazz
— ETHICAL INNOVATION —

SIDNfonds

PRIVACY LABEL



Which is longer?

**Much ado
about
nothing**

Shakespeare

**iTunes
Terms &
Service**

Apple

PRIVACY LABEL



Which is longer?

**Much ado
about
nothing**

~ 32000

**iTunes
Terms &
Service**

~ 31000

PRIVACY LABEL

TECHNOLOGY

Reading the Privacy Policies You Encounter in a Year Would Take 76 Work Days

ALEXIS C. MADRIGAL MAR 1, 2012



Share



Tweet



Email

One simple answer to our privacy problems would be if everyone became maximally informed about how much data was being kept and sold about them. Logically, to do so, you'd have to read all the privacy policies on the websites you visit. A few years ago, two researchers, both then at Carnegie Mellon, decided to calculate how much time it would take to actually read every privacy policy you should.

First, Lorrie Faith Cranor and Aleecia McDonald needed a solid estimate for the average length of a privacy policy. The median length of a privacy policy from the top 75 websites turned out to be 2,514 words. A standard reading rate in the academic literature is about 250 words a minute, so each and every privacy policy costs each person 10 minutes to read.

Next, they had to figure out how many websites, each of which has a different privacy policy, the average American visits. Surprisingly, there was no really good estimate, but working from several sources including their own monthly tallies and other survey research, they came up with a range of between 1,354 and 1,518 with their best estimate sitting at 1,462.

MORE STORIES

Artificial Intelligence Shows Why Atheism Is Unpopular

SIGAL SAMUEL

**Microfilm Lasts Half a Millennium**

CRAIG SAPER

**The Elon Musk Impersonators of the Internet**

MARINA KOREN

**The Authors Who Love Amazon**

ALANA SEMUELS



Opinion | [THE PRIVACY PROJECT](#)

We Read 150 Privacy Policies. They Were an Incomprehensible Disaster.

By Kevin Litman-Navarro

Minutes to Read

In the background here are several privacy policies from major tech and media platforms. Like most privacy policies, they're verbose and full of legal jargon — and opaquely establish companies' justifications for collecting and selling your data. The data market has become the engine of the internet, and these privacy policies we agree to but don't fully understand help fuel it.



We can do better...

Design Thinking!



The EU recognises the
problem in the GDPR



...but those icons...
Oh, and 'machine readable'

~~P~~ R I V A C Y L A B E L



Can you design something new?

- ECP, Platform for the Information Society

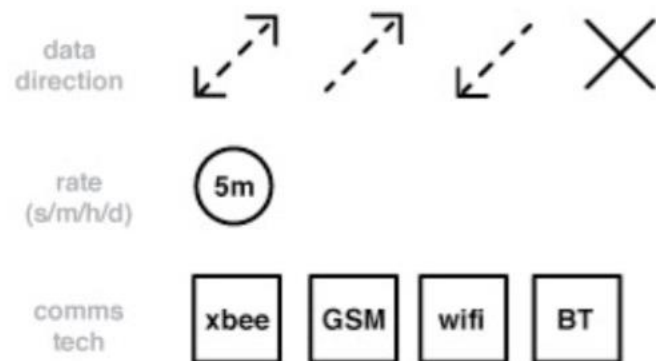
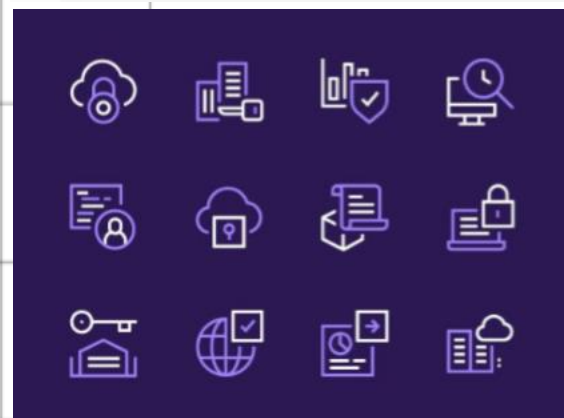


1. What do we need?
2. What we made
3. Plans for the future

What do we need?



	No personal data are collected beyond the minimum necessary for each specific purpose of the processing
	No personal data are retained beyond the minimum necessary for each specific purpose of the processing
	No personal data are processed for purposes other than the purposes for which they were collected
	No personal data are disseminated to commercial third parties
	No personal data are sold or rented out
	No personal data are retained in unencrypted form



- Google keeps your searches and other identifiable user information for an undefined period of time
 - This service tracks you on other websites
 - Google can use your content for all their existing and future services
 - Partial archives of their terms are available
 - Google may collect your device fingerprint.
- [More details](#)



Personal data policies



Tracking data policies



= 100
Best score



COOKIE COMPLIANCE

Compliance with EU cookie laws: ePrivacy Directive and GDPR



WEBSITE SCANNING

Continuous website scanning against the largest cookie database



CONSENT TOOLS

Easy-to-use and customizable website visitor consent tool.



INTEGRATED PLATFORM

Integrated with OneTrust privacy management platform



Obligations of your organisation towards the data subject

- demonstrate compliance
- implement privacy by design
- joint controllers clarify their arrangements
- clear agreements between controllers and processors
- processors only work on written instructions
- controllers keep records of all processings
- controllers and processors guarantee security
- controllers notify the data subject of a breach

data subject

Rights and obligations under the general data protection regulation

Rights of the data subject towards your organisation

- be informed about processing
- inquire about processings
- require to delete personal data
- take information to a different organisation
- ask to postpone or stop processing data
- object to automated decision making



Device

Uses statistical algorithms to infer IDs from information provided by the connected device, browser, app, or operating system.



Client

The users' browser, app, or operating system establishes a consistent ID that is made available to requesting parties, along with user preferences.



Network

Third-party servers positioned between the users' device and the publishers' servers set IDs that are used to track user information and manage preferences.



Server

The currently used approach, in which cookies are used to track user information and manage preferences.



Cloud

Tracks user information and manages preferences via a centralized service that multiple parties agree to work with, potentially bridging user recognition across multiple solution classes.

Obligations of your organisation towards the supervisory authority

Competences of the supervisory authority towards your organisation

your organisation

Learn more about privacy governance and data mapping on [privacyperfect.com](https://www.privacyperfect.com)
Social: www.twitter.com/privacyperfect
[linkedin.com/company/privacyperfect](https://www.linkedin.com/company/privacyperfect)

PRIVACY NOTICE

About Us

XYZ Limited, High Street, Somertown, LX1 1XX United Kingdom. www.xyz.com.

We are a social housing provider located in the United Kingdom. Our DPO is John Smith. dpo@xyz.com.

Summary

We are using a CCTV system to capture high definition video images to help us to monitor antisocial behaviour, crime, and emergency incidents/situations. The CCTV data is shared with a small number of organisations including G4S and the Police. The CCTV data is stored overseas in secure locations. We are processing CCTV data without the consent of the data subjects in pursuit of our legitimate interests and those of the data subjects whose data we process.

Purposes



Sources



Retention



Territories



Sharing



Your Rights

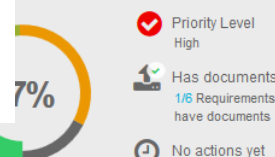


Further Information

Scan the QR code to download a copy of our privacy notice.

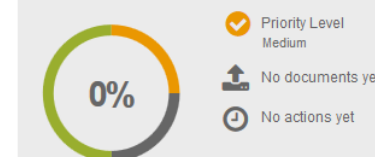


2 - Policy and Legal Basis



Last updated: 18/01/2016

3 - Notices to Data Subjects



Last updated: 18/01/2016

4 - Encryption, Security and Access Controls



Last updated: 18/01/2016

5 - PIAs and Risk Analysis



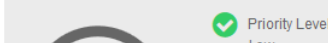
Last updated: 18/01/2016

6 - Obligations to Data Subjects



Last updated: 18/01/2016

7 - Obligations to Data Protection Authorities



8 - Policies and Training



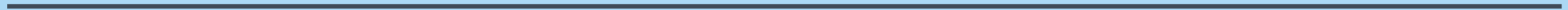
9 - Data Breach Notification





Factual

Judgemental





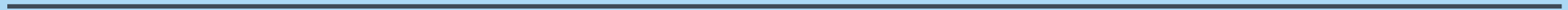


**Data may
damage your
job prospects**



Voluntary

Enforced



PRIVACY LABEL

echo dot

「アレクサ、
音楽をかけて」

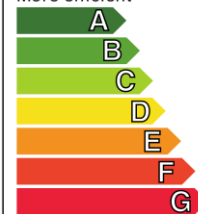


 FAR-FIELD
VOICE CONTROL

Privacy

Manufacturer
Model

More efficient



Less efficient

Also works cloudless

Third party profiling

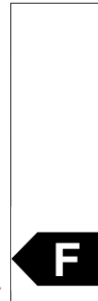
Data crosses EU border

Encryption and security

Privacy as default setting

Further information is continued
in product brochures

Nest
Thermostat



No

Yes

Yes

A B C D E F G

A B C D E F





~~Icons?~~ Template!

 PRIVACY LABEL



[Banking](#)

[Borrowing](#)

[Investing & Retiring](#)

[Insurance](#)

[Online Banking](#)

Privacy Notice

[Home](#) > **Privacy Notice**

FACTS

**WHAT DOES HSBC DO WITH YOUR
PERSONAL INFORMATION?**

Privacy Policies

[Online Privacy Statement](#) >

[California Privacy](#) >

[Privacy Notice](#) >

[Private Banking Privacy Notice](#) >



Banking

Borrowing

Investing & Retiring

Insurance

Online Banking

FACTS

WHAT DOES HSBC DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and account transactions
- Account balances and credit history
- Income and assets

How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons HSBC chooses to share; and whether you can limit this sharing.

Privacy Policies

[Online Privacy Statement >](#)

[California Privacy >](#)

[Privacy Notice >](#)

[Private Banking Privacy Notice >](#)

Security

[Protect You >](#)

[Report Fraud >](#)

[Protect Your Business >](#)

[Protecting Consumers >](#)

[Other Security Resources >](#)

[Alerts >](#)

[HSBC Safeguard >](#)



Banking

Borrowing

Investing & Retiring

Insurance

Online Banking

Reasons we can share your personal information	Does HSBC share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes – information about your creditworthiness	Yes	Yes
For affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	We don't share

To limit our sharing

- Call 877.394.HSBC (4722) - our menu will prompt you through your choice(s). If you are calling from outside the United States or Canada, you may call us collect at 716.841.7394. Both options are available 24 hours a day, 7 days a week.

Please note:

If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we

Kokosmelk

200 ml

4 porties (50 ml)

Ingrediënten:

56% kokosextract,
water, emulgator (E407),
verdikkingsmiddel
(guarpitmeel), stabilisator
(xanthaangom).

Allergie-informatie: -

glutenvrij melkrij



Voedingswaarde per 1

energie _____ 705 kJ /

vetten _____

waarvan

verzadigde vetzuren _____

enkelvoudig

onverzadigde vetzuren _____

meervoudig

onverzadigde vetzuren _____

koolhydraten _____

waarvan suikers _____

vezels _____

eiwitten _____

zout * _____

* Zout is enkel afkomstig uit

natuurlijk voorkomende zouten



Informative & Voluntary

PRIVACY LABEL

What we made



Demo label

Here you can describe in slightly more detail what the label is for. It might be for a web form, a company, or for hiring more employees.



Collected data

- We receive from you personal data [?]
- We receive from others aggregated data, sensitive personal data & special categories data [?]
- We observe aggregated data & personal data [?]
- We create personal data, sensitive personal data & special categories data [?]
- We purchase aggregated data & sensitive personal data [?]



Usage

- Human resources [?]
- Providing goods and services [?]



Location

- Most data is processed outside the EU [?]



Duration

- Most data more than 10 years [?]
- Some data less than 1 year [?]
- A little data less than a month [?]
- The least amount less than 10 years [?]



Legal basis

- We have a legal obligation [?]
- We have a contract [?]

Demo

Go to:

www.privacylabel.org/manager



The left side of Privacy Label shows how personal data flows through the organisation.

The right side of Privacy label shows important additional information on processed personal data..

Collected data:

Usage:

Automated decision making:
Does the organisation make use of automated decision making?

Automated decision making:
Does the organisation make use of automated decision making?

Last update of this Privacy Label

Where is personal data processed?

For how long is personal data stored?

For what legal basis is personal data being processed?

How can you get more information and exercise your rights?

Privacy Label version

Demo label Here you can describe in slightly more detail what the label is for. It might be for a web form, a company, or for hiring more employees.	
 Collected data • We receive from you personal data ² • We receive from others aggregated data, sensitive personal data & special categories data ² • We observe aggregated data & personal data ² • We create personal data, sensitive personal data & special categories data ² • We purchase aggregated data & sensitive personal data ²	 Location • Most data is processed outside the EU ²  Duration • Most data more than 10 years ² • Some data less than 1 year ² • A little data less than a month ² • The least amount less than 10 years ²
 Usage • Human resources ² • Academic research ² • Sales and customer relations ² • Financial administration ² • Authorisation management ² • Crime and national security ²  Automated decision making • We do not make use of automated decision making ²	 Legal basis • We have a legal obligation ² • We have a contract ² • We have a vital interest ² • We have a public task ² • You gave consent ² • We have a legitimate interest ²  Data sharing • We share data with advertisers ² • We share data with processors ² • We share data with government ² • We share data with service providers ² • We share data with partners ²  Take action • Contact our privacy officer ◦ info@privacylabel.org ◦ +31123456789 • Read our privacy policy

Last updated 2019-10

Privacy Label version 2019-09 BETA

The left side of Privacy Label shows how personal data flows through the organisation.

The left side of Privacy Label shows how personal data flows through the organisation.

The right side of Privacy label shows important additional information on processed personal data..

The right side of Privacy label shows important additional information on processed personal data..

Collected data:

Collected data:

Which types of data are collected and how?

Usage:

For what purpose is personal data processed?

Automated decision making:

Does the organisation make use of automated decision making?

Data sharing:

How does personal data flow out of the organisation?

Last update of this Privacy Label

Demo label	
Here you can describe in slightly more detail what the label is for. It might be for a web form, a company, or for hiring more employees.	
Collected data - We receive from you personal data [?] - We receive from others aggregated data, sensitive personal data & special categories data [?] - We observe aggregated data & personal data [?] - We create personal data, sensitive personal data & special categories data [?] - We purchase aggregated data & sensitive personal data [?]	Location Most data is processed outside the EU [?]
Usage - Human resources [?] - Academic research [?] - Sales and customer relations [?] - Financial administration [?] - Authorisation management [?] - Crime and national security [?]	Duration - Most data more than 10 years [?] - Some data less than 1 year [?] - A little data less than a month [?] - The least amount less than 10 years [?]
Automated decision making We do not make use of automated decision making [?]	Legal basis - We have a legal obligation [?] - We have a contract [?] - We have a vital interest [?] - We have a public task [?] - You gave consent [?] - We have a legitimate interest [?]
Data sharing - We share data with advertisers [?] - We share data with processors [?] - We share data with government [?] - We share data with service providers [?] - We share data with partners [?]	Take action - Contact our privacy officer info@privacylabel.org +31123456789 Read our privacy policy

Last updated 2019-10

Privacy Label version 2019-09 BETA

Location:

Where is personal data processed?

Duration:

For how long is personal data stored?

Legal basis:

For what legal basis is personal data being processed?

Take action:

How can you get more information and exercise your rights?

Privacy Label version

The left side of Privacy Label shows how personal data flows through the organisation.

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Collected data:

Usage:

Automated decision making:
Does the organisation make use of automated decision making?

Automated decision making:
Does the organisation make use of automated decision making?

Last update of this Privacy Label

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For how long is personal data stored?

For what legal basis is personal data being processed?

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 Data sharing • We share data with advertisers [?] • We share data with processors [?] • We share data with government [?] • We share data with service providers [?] • We share data with partners [?]	

Introduction

Information Google collects

Why Google collects data

Your privacy controls

Sharing your information

Keeping your information secure

Exporting & deleting your information

Retaining your information

Compliance & cooperation with regulators

About this policy

Related privacy practices

Demo label

Here you can describe in slightly more detail what the label is for. It might be for a web form, a company, or for hiring more employees.



Collected data

- We receive from you personal data ?
- We receive from others aggregated data, sensitive personal data & special categories data ?
- We observe aggregated



Location

- Most data is processed outside the EU ?



Duration

- Most data more than 10 years ?
- Some data less than 1 year ?

Privacy

Verzamelde persoonsgegevens →



- We ontvangen creëren kopen verzamelen niet-persoonlijke gegevens.
- We ontvangen creëren kopen verzamelen persoonsgegevens.
- We ontvangen creëren kopen verzamelen bijzondere persoonsgegevens.

Details



- De meeste persoonsgegevens zijn opgeslagen in de EU
- Sommige persoonsgegevens zijn opgeslagen buiten de EU



Gebruik van persoonsgegevens



- Onderwijsactiviteiten
- Alumni-activiteiten
- Wetenschappelijk onderzoek
- Bedrijfsvoering



- We maken niet gebruik van automatische besluitvorming

Juridische basis



- De meeste persoonsgegevens worden voor de vervulling van publieke taken
- Echter, de UM kan jouw persoonsgegevens ook verwerken op grond van:
 - - De uitvoering van een overeenkomst met jou

Gedeelde persoonsgegevens →



- We delen sommige persoonsgegevens met derde partijen:
 - - Aan de UM gelieerde derden
 - - Overheidsinstanties
 - - Andere onderwijsinstellingen
 - - Derden
- We delen persoonsgegevens wanneer we dat wettelijk verplicht zijn

Wat kun je doen?



- Neem contact op met onze FG over dit onderwerp via:
 - - E-mail: fg@maastrichtuniversity.nl
- Lees onze volledige privacyverklaring
- Je persoonsgegevens opvragen

[Privacystatement](#)
[Cookie statement](#)
[Algemene voorwaarden](#)
[Disclaimer en beveiliging](#)
[Home](#) [Privacystatement](#)

Privacystatement

Windesheim neemt jouw privacy uiterst serieus en gaat zorgvuldig om met persoonlijke gegevens van potentiële studenten, relaties en bezoekers. Bij de verwerking van persoonsgegevens houden wij ons aan de eisen die de Algemene Verordening Gegevensbescherming daaraan stelt. Het College van Bestuur is verantwoordelijk voor de gegevensverwerking van de Stichting Christelijke Hogeschool Windesheim, Campus 2, 8017 CA Zwolle.

Verzamelde
persoonsgegevens →



- We ontvangen creëren verzamelen niet-persoonlijke gegevens.
- We ontvangen creëren verzamelen persoonsgegevens.
- We ontvangen bijzondere persoonsgegevens.

Gebruik van
persoonsgegevens



- Onderwijsactiviteiten
- Bedrijfsvoering



- We maken niet gebruik van automatische besluitvorming

Gedeelde persoonsgegevens →



- Jouw gegevens stellen wij niet beschikbaar aan derden, tenzij dat noodzakelijk is voor de uitvoering van onze dienstverlening aan jou.

Details



- De meeste persoonsgegevens zijn opgeslagen in de EU

Juridische basis



- De meeste persoonsgegevens worden voor het

Wat kun je doen?



- Neem contact op over dit onderwerp via:
- E-mail:

Direct
downloaden



[Meldingen gebruik
persoonsgegevens](#)
[Regels tentaminering](#)
[Privacy statement student](#)



KONINKLIJKE NEDERLANDSE AKADEMIE VAN WETENSCHAPPEN

[HOME](#) [ACTUEEL](#) [DE KNAW](#) [LEDEN](#) [INSTITUTEN](#) [ADVIEZEN](#) [FONDSEN & PRIJZEN](#) [INTERNATIONAAL](#) [THEMATISCH](#)[Home](#) [De KNAW](#)

PRIVACYVERKLARING KONINKLIJKE NEDERLANDSE AKADEMIE VAN WETENSCHAPPEN (KNAW)

[Beleid](#)[Taken](#)[Organisatie](#)[Akademie van Kunsten](#)[De Jonge Akademie](#)[Comeniusnetwerk](#)[Werken bij de KNAW](#)[Talentontwikkeling bij de KNAW](#)[Geschiedenis KNAW](#)[Het Trippenhuis](#)[Privacyverklaring KNAW](#)

Verzamelde persoonsgegevens



We ontvangen creëren kopen verzamelen niet-persoonlijke gegevens.

We ontvangen creëren kopen verzamelen persoonsgegevens.

We ontvangen creëren kopen verzamelen bijzondere persoonsgegevens.

Gebruik van persoonsgegevens



Uitvoeren van wettelijke taken

ondersteunen van, adviseren over en stimuleren van wetenschap

Uitvoeren van rol als werkgever

Communicatie



We maken niet gebruik van automatische besluitvorming

Gedeelde persoonsgegevens



We delen sommige persoonsgegevens met derde partijen:

- Wanneer hier een wettelijke verplichting voor is
- Wanneer hier een grondslag zoals bedoeld in artikel 6 AVG voor aanwezig is

[DEEL DIT ARTIKEL](#)

Details



De meeste persoonsgegevens

Juridische basis



Wij verwerken persoonsgegevens

Wat kun je doen?



Neem contact op over dit onderwerp

3.

Our Plans





2019 Q4: Beta testing



2020:
Promoting!

#PRIVACY LABEL



Get in touch!

www.privacylabel.org
info@privacylabel.org



PRIVACY LABEL

The left side of Privacy Label shows how personal data flows through the organisation.

The right side of Privacy label shows important additional information on processed personal data..

Collected data:

Usage:

Automated decision making:
Does the organisation make use of automated decision making?

Automated decision making:
Does the organisation make use of automated decision making?

Last update of this Privacy Label

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For what legal basis is personal data being processed?

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