

Progettare informative privacy

comprensibilità ed efficienza tra tecniche comunicative e legal design

e-privacy 2022 - autumn edition

A cura di:

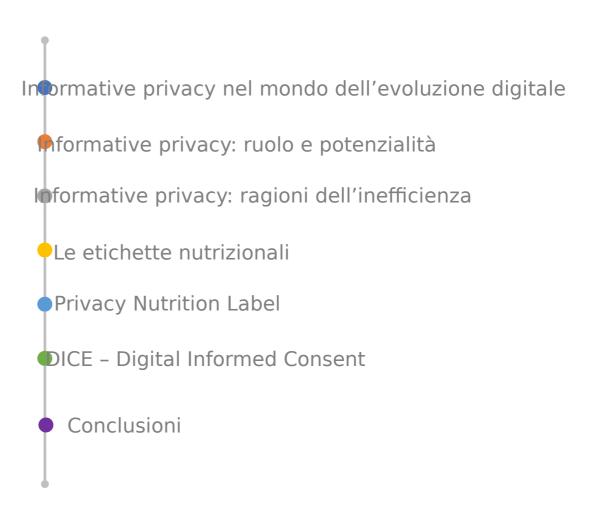
Chiara Vescovi

Dottoranda in Informatica giuridica presso Università Bicocca Cyber Law Expert per ReD OPEN Srl

Progettare informative privacy

Agenda della Presentaz ione







Informative privacy nel mondo dell'evoluzione digitale (1)



Informative privacy nel mondo dell'evoluzione digitale (2)

Recent news reports have highlighted the often **confusing nature of privacy policies**, and the staff who reviewed the content of privacy policies reported similar frustration in parsing the sometimes **contradictory language** of many of these policies. Perhaps as a result of such confusing policies, **64% of consumers have indicated that they do not trust even those sites with posted privacy policies**. [...] The confusion caused by poorly-drafted privacy disclosures can be broadly grouped into three problem areas:

- contradictory language,
- unclear descriptions of how consumers can exercise choice, and
- the possibility of changes to the policy at any time

U.S. Federal Trade Commission, Privacy Online: Fair Information Practices in the Electronic Marketplace - A report to Congress, 2000, p.24



«Given the key role that individuals play in transmitting personal data, education and awareness activities may be required to help them better understand the risks involved in posting information about themselves and others online, and further consideration may need to be given to their role in privacy protection frameworks. »

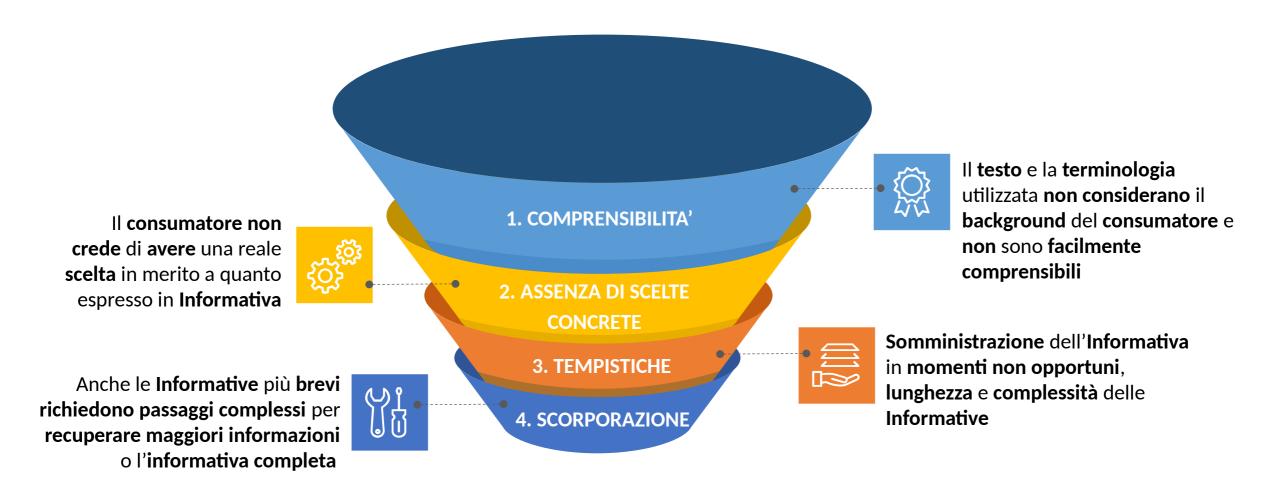
OECD, The OECD Privacy Framework, Parigi, 2013, p.98.



Informative privacy: ruolo e potenzialità



Informative privacy: ragioni dell'inefficienza





Esempi di risoluzione dell'inefficienza



- 1) Multilayered Privacy Policy
- 2) Proposta del Kleimann Group
- 3) Privacy Nutrition Label ("Etichette Privacy")
 - P3P
 - Simplified
 - Privacy Nutrition Label



1) Multilayered Privacy Policy

Nei primi anni 2000 lo studio legale Hunton & William ha creato il Center for Information on Privacy Leadership a cui ha affidato il compito di ripensare alle Informative in un'ottica di standardizzazione delle informazioni.

> **Informativa** in **forma breve**: **Multilayered Policy** (informativa multistrato).



Struttura

Un generico documento a sezioni espandibili, da somministrare prima dell'Informativa completa



Pro

Struttura standard, aiuta il consumatore nella lettura e l'ente nell'organizzazione dei trattamenti, flessibilità e facilità di confronto tra informative diverse



Contro

Comprensibilità per l'utente ancora difficoltosa





australia.gov.au Your connection with government

GOVERNMENT IN AUSTRALIA

INFORMATION FOR

BROWSE BY SUBJECT

ONLINE SERVICES

searchgov Australia

Search Advanced Search

Privacy Notice Highlights

This statement applies to the australia.gov.au website only. The website is managed by the Department of

Australia gov.au collects personal information that you choose to give us, for example your email address. We do not collect identifiable personal information about you if you only browse this website.

We only use your personal information for the purposes for which you gave it to us.

We do not share information about you with other government agencies or other organisations without your permission unless it:

- · is necessary to provide you with a service that you have requested;
- · is required or authorised by law; or
- · will prevent or lessen a serious and imminent threat to somebody's health

We analyse non-identifiable web site traffic data to improve our services. We do not use cookies or web bugs.

You may gain access to personal information about you that we hold. You can have us correct any errors or delete the information we have about you.

You may opt out of any further contact from us.

To protect your privacy and the privacy of others, we may have to gain evidence of your identity before we can give you access to information about you or change it.

EMPORTANT INFORMATION

This website is bound by the Information Privacy Principles of the Privacy Act 1988.

We also follow the Guidelines for Federal and ACT Government Websites issued by the Office of the Privacy Commissioner

HOW TO CONTACT US

Contact us about any of your privacy concerns or to suggest further improvements to this website.

Alternatively, write to us at:

Manager, australia.gov.au

Australian Government Information Management Office

Department of Finance and Administration

John Gorton Building King Edwards Terrace

Parkes ACT 2600

AUSTRALIA

For more information about our privacy practices, see our full privacy statement.

2) Kleimann Group

Il Gramm-Leach-Bliley Act nel 1999 ha imposto alle istituzioni finanziarie la divulgazione delle proprie pratiche di condivisione delle informazioni, varie Associazioni di categoria si lanciarono nella creazione di nuovi modelli di informativi.

Da interviste cognitive e focus group scaturi la soluzione del Kleimann Group



Struttura

Informativa diviso in quattro parti: il titolo, il contesto, una parte informativa e un form di opt-out ∏Forte tentativo di sintesi



Pro

Approccio multidisciplinare anche nella realizzazione, focus sull'organizzazione dei contenuti [] aiuto per il titolare nell'organizzazione del proprio lavoro



Contro

Aree tematiche rigide (poca flessibilità), non parla il linguaggio del consumatore



FACTS

Questions?

Go to: www.ally.com/privacy

WHAT DOES ALLY 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 services you have with us. This information can include:			
	Social Security number and income Account balances and payment history Credit history and transaction history			
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 Ally chooses to share; and whether you can limit this sharing.			
Reasons we	can share your personal information	Does Ally 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 investigation, 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 credit worthiness		YES	YES	
For our affiliates to market to you		YES	YES	
For nonaffiliates to market to you		YES	YES	
To limit our sharing	Call 800-204-2197 – have your account number available and our menu will prompt you through your choice(s) or Visit us online: Auto and Bank customers log in to your Ally account and look for Profile and Privacy Preferences or Go to www.ally.com/privacy and choose the "Manage My Privacy Preferences" link Please note: If you are a new customer, we can begin sharing your information 45 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.			
	I rome real from comment that it may make to main our armin	4		

3) La svolta: le etichette nutrizionali

Il CyLab Usable and Security Laboratory (CUPS) della **Carnegie Mellon University** invece di creare strumenti nuovi, propose di utilizzare modelli già conosciuti ai consumatori

Example of Graphic Enhancements used by FDA



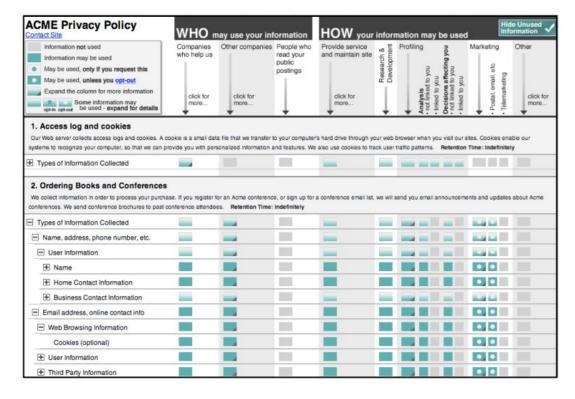
Le Etichette Nutrizionali

- attenzione ad aspetti di design e formattazione
- limitato e selezionato numero di informazioni
- rilevanza dell'educazione scolastica nella comprensibilità
- rilevanza del sostrato culturale (es. diet culture)



Le Etichette Nutrizionali

P3P Expandable Grid

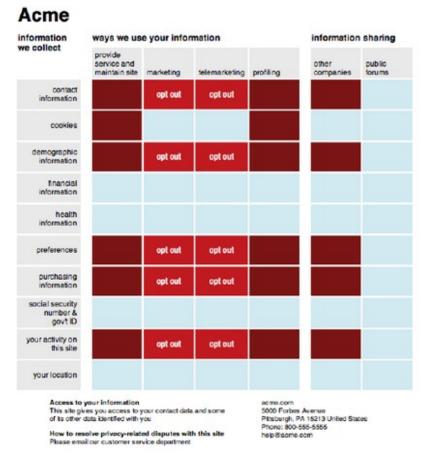




	E Corporation do with Your Persona	
WHAT informa	tion do they collect?	
	interactions with this site out your computer and pages you visited on this website	
Your social and econom	ic categories or group memberships	
Your contact information including your email add	n (optional) ress and your phone number	
Financial or purchase in	formation	
HOW do they	use your information?	Can you limit this use?
For everyday business p to process your transaction	ourposes- on, administer our site, or customize our site for you	No
For marketing purposes— to offer products and services to you (but not through telemarketing)		Yes (check your choices below
For profiling purposes— to do analysis with your data, both linked and not linked to you		This is only used on your request
WHO may yo	ur information be shared with?	Can you limit this sharing?
Our company and comp Companies who have si	No	
CONTACT US	Call 1-800-898-9698 or go to www.acme.com/p	privacy
	If you want to limit your sharing please contact us by telephores send us this form by mail, or use our opt-out page here.	one, go online to our full policy,

Simplified Label

Un nuovo prototipo: Privacy Nutrition Label



information ways we use your information information sharing we collect provide service and other public telemarketing profiling maintain site marketing companies forums contact opt out information cookies demographic opt out opt out information preferences opt out opt out purchasing opt out opt out information your activity on opt out opt out this site Information not collected or used by this site: social security number & government ID, financial, health, location. Access to your information This site gives you access to your contact data and some 5000 Forbes Avenue of its other data identified with you Pittsburgh, PA 15213 United States Phone: 800-555-5555

Acme

we will colect and use your information in this way

Please email our customer service department

How to resolve privacy-related disputes with this site

you tell us not to by opting out

by default, we will collect and use your information in this way unless

we will not collect and use your information in this way

by default, we will not colect and use your information in this way unless you allow us to by opting in

moo.omo.com

- ✓ Design iterativo
- ✓ Accompagnate da un breve glossario
- ✓ Brevi, immediata lettura
- ✓ Formulazione tabellare che permette il confronto
- ✓ Scelta ragionata dei colori



Privacy Nutrition Label

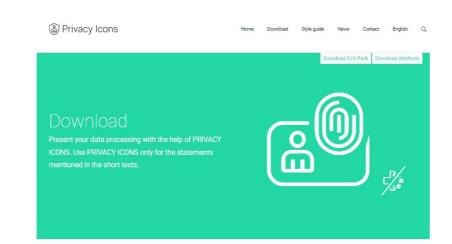


App Privacy See Details The developer, Apple, indicated that the app's privacy practices may include handling of data as described below. For more information, see the developer's privacy policy. Data Linked to You Data Not Linked to You The following data may be collected and The following data may be collected but it is linked to your identity: not linked to your identity: Contact Info Search History Location Identifiers Diagnostics Financial Info Purchases ■■■ Usage Data User Content

Privacy practices may vary, for example, based on the features you use or your age. Learn More









Aggiornamento dei Termini e dell'Informativa sulla privacy di WhatsApp



Non stiamo apportando modifiche alla privacy delle tue conversazioni personali.

Questo aggiornamento dei nostri Termini e della nostra Informativa sulla privacy fornisce maggiori informazioni, anche in merito a come puoi comunicare con le aziende, se lo desideri. Questo include:



Come le aziende possono gestire le chat grazie agli strumenti di Facebook. Le chat con queste aziende sono facoltative e sono contrassegnate chiaramente nell'app.



Maggiori informazioni su come funziona WhatsApp, incluse le modalità di trattamento dei dati e come garantiamo la sicurezza del tuo account.

I termini entreranno in vigore il 15 maggio 2021. Ti invitiamo ad accettarli per continuare a usare WhatsApp dopo questa data. Per maggiori informazioni sul tuo account, ti invitiamo a leggere questa pagina. Per saperne di più su come elaboriamo i tuoi dati, consulta la nostra Informativa sulla privacy aggiornata.



DICE - Digital Informed Consent

A giugno 2019 un gruppo di lavoro dell'Università Bicocca di Milano, guidato dal Professor Cabitza ha rilasciato il risultato di uno studio sul consenso, ricorrendo ad elementi grafici ma prendendo anche in considerazione la maturità di comprensione del lettore, la sua sfera emotiva e l'evidente difficoltà nel capire una terminologia tecnica (in questo caso giuridica).



Struttura

Un consenso informato in forma elettronica, accessibile online tramite Web Browser



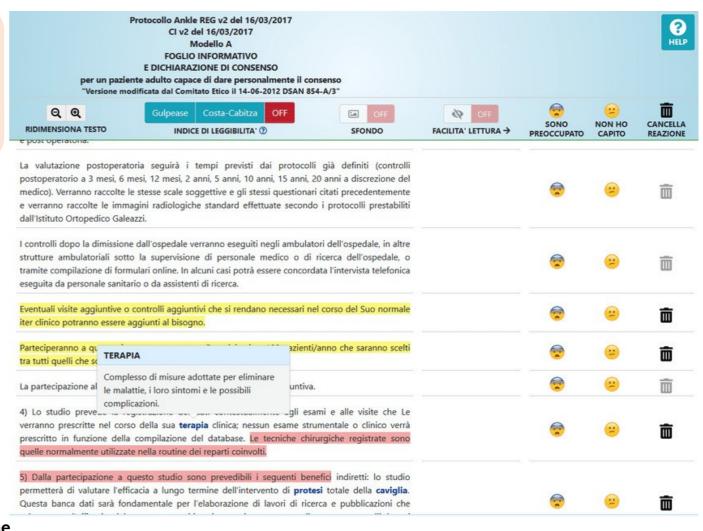
Pro

Spiegazioni dei termini medici, considerando il livello culturale dell'utente, utilizzo di strumenti di design, stimola l'interazione medico-paziente, considerazione del livello emotivo del paziente



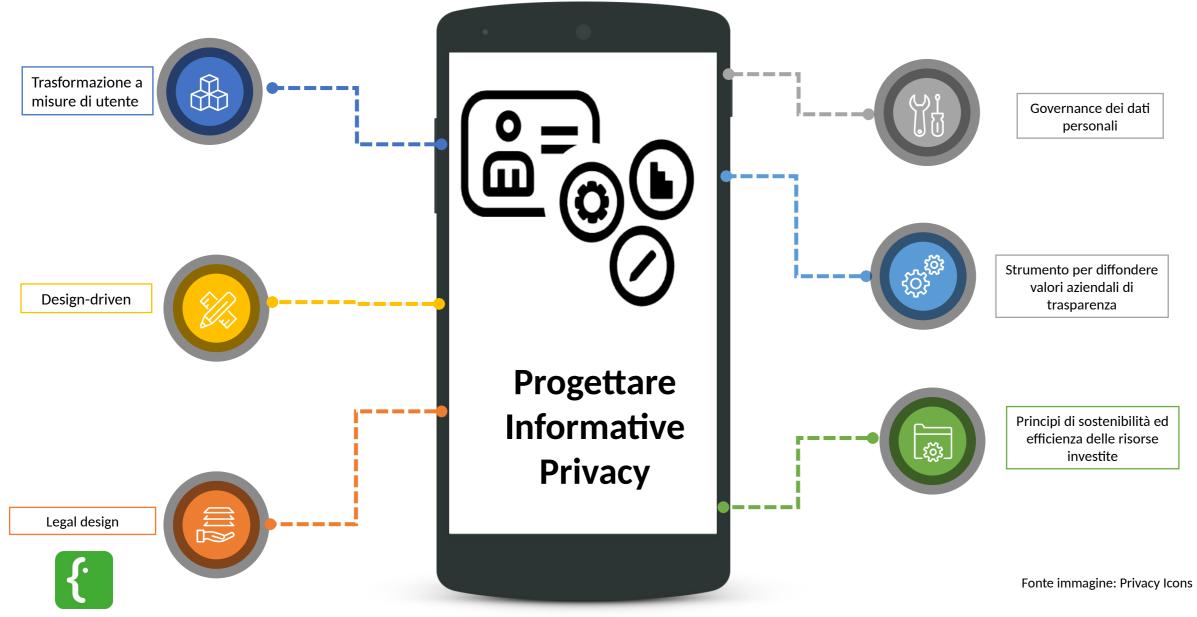
Contro

Difficoltà di gestione da parte degli operatori sanitari, poca flessibilità, richiede un livello di consapevolezza delle emozioni da parte del paziente, tempistiche lunghe





Conclusioni





Grazie per l'attenzione!

Chiara Vescovi

RECAPITI:

chiara.vescovi@redopen.it
chiara.vescovi@unimib.it

30/09/2022