

TRUSTe Wireless Privacy Principles and Guidelines

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INTRODUCTION

The convergence of wireless technology and the internet has created new opportunities for mobile computing, and with that, some new privacy issues. While the basic framework for addressing Privacy Principles and Practices on the Internet still applies to the world of mobile computing, certain characteristics of wireless services must be considered in determining how best to implement the Principles of Notice, Choice, Access, Security and Redress as set forth in the Federal Communications Commission, Federal Trade Commission and Department of Commerce Fair Information Practices¹:

Advent of Location Based Services

Consumers may perceive Location Based Services as more privacy-invasive than other wireless services and applications. In particular, consumers may be concerned about how and when information about their location is generated, used and stored, thus raising issues of Notice, Choice and Retention.

Variety of Technological Constraints

While large computer screens enable easy delivery of Notice and Choice options in real time, the small size and limited processing power of many Wireless Devices challenges the degree to which Notice and Choice can be communicated.

Principles in Progress

To move from a theoretical discussion of Wireless Privacy Principles to practical application, these Wireless Privacy Principles and Implementation Guidelines leave some issues to be addressed at a later date, as the technology and consumers' use of it grows. These issues are outlined in Appendix 2.

¹ <http://www3.ftc.gov/reports/privacy3/fairinfo.htm>

PROGRAM OVERVIEW

Organization

The mission of this program is to create Wireless Privacy Principles and Implementation Guidelines that engender consumer trust and integrate both industry and consumer requirements. The Wireless Advisory Committee that drafted these Wireless Privacy Principles and Implementation Guidelines is comprised of wireless carriers, content providers, consumer groups, and other industry leaders involved in the creation, use, management, sharing and retention of information about the Consumer, which results from wireless activity. This Committee will continue to meet to discuss new issues and resolve issues as they arise in the implementation of these principles and implementation guidelines.

The following companies and organizations are members of the Wireless Advisory Committee:

- AT&T Wireless
- Hewlett Packard
- Microsoft
- Mobile Marketing Association (MMA)
- PriceWaterhouseCoopers
- Center For Democracy and Technology (CDT)
- Privacy Rights Clearinghouse (PRC)
- Wireless Location Industry Association (WLIA)

Operating Assumption for Implementation

This first version of the Wireless Privacy Principles and Implementation Guidelines assumes that the Consumer has desktop/laptop computer access to the internet, so that the Consumer may receive the full privacy statement, handle preference setting and gain access to Personally Identifiable Information.

In addition the Advisory Committee identified what it viewed as the top issues that needed to be addressed during this first phase of the Wireless Privacy Principles and Implementation Guidelines.

- Top issues :
 - Device-appropriate delivery of Notice and Choice
 - Appropriate management and use of location information
 - Unauthorized sharing of information
 - Ability to access and edit permissions
 - Consistency with existing practices for online privacy
 - US-focus

PRINCIPLES AND IMPLEMENTATION GUIDELINES

Scope of Principles

These Wireless Privacy Principles and Implementation Guidelines are designed for companies that provide wireless content, including SMS Services, data and wireless web services geared toward Wireless Devices. These organizations, collectively referred to as “Wireless Service Providers,” include wireless carriers, content providers, and applications service providers. Wi-fi and Telematic Technologies are not considered in the scope of these Wireless Privacy Principles and Implementation Guidelines. These Wireless Privacy Principles and Implementation Guidelines build upon the Federal Communications Commission, Federal Trade Commission’s, Department of Commerce existing privacy principles, as applicable, and do not seek to change the underlying privacy principles from the internet simply because the Consumer chooses to access internet-based activities on a Wireless Device.

I. NOTICE

Principle: Notice should be available, where technically feasible, during the use of Wireless Services and must also be delivered whenever Choice is offered. For example, with SMS technology, it is not technically feasible, whereas with WAP technology it is. Notice should be easily accessible to the Consumer.

Instruments for delivering Notice to the Consumer include:

1. Full Privacy Statement
2. Notice of the Statement
3. Supplemental Privacy Statement
4. Notice of Material Change

The medium and circumstances in which Notice is being provided will determine which instrument to use.

Implementation Guideline:

A. Full Privacy Statement

Wireless Service Providers should provide a Full Privacy Statement to the Consumer prior to or during the collection of personally identifiable information, or upon first use of the Wireless Service. It should always be available prominently on the Wireless Service Provider’s website, and may be identified by the presence of a Wireless Privacy Seal.

1. Content Requirements
 - a. The name of the organization collecting the Personally Identifiable Information.
 - b. What types of information, including Personally Identifiable Information, unique identifiers and Location Information, the Wireless Service Provider collects.
 - c. What Personally Identifiable Information is collected via a Third Party.
 - d. How the Wireless Service Provider uses the information.
 - e. With whom the Wireless Service Provider may share Personally Identifiable Information and/or Location Information, including any Agents.
 - f. What choices are available to the Consumer regarding collection, use, and distribution of Personally Identifiable Information and/or Location Information.
 - g. What types of security procedures are in place to protect the loss, misuse or alteration of Personally Identifiable Information collected from the Consumer by the Wireless Service Provider.
 - h. How the Consumer may access and correct any inaccuracies.
 - i. Whether Location Information is retained beyond the time period reasonably needed to complete the Transaction requested by the Consumer.

2. Delivery Requirements: The Full Privacy Statement should be delivered as follows:
 - a. If a Transaction is conducted offline, the Wireless Service Provider should do at least one of the following:
 - i. Deliver the Full Privacy Statement separately;
 - ii. Include the Full Privacy Statement in product or service brochures or the service contract; or
 - iii. Include a clear and conspicuous statement in the product or service brochure that the Full Privacy Statement is available by asking an associate or provide a short form privacy notice onsite. This statement should also include the URL of the web page where the Full Privacy Statement is located.
 - b. If a Transaction is conducted online, but not on a Wireless Device, the Wireless Service Provider should provide a link to the web page where the Full Privacy Statement is located.
 - c. If a transaction is conducted on a Wireless Device, the Wireless Service Provider should do at least one of the following:
 - i. Deliver the Notice of the Statement; or
 - ii. Deliver the Full Privacy Statement, as soon as practical, in an appropriate medium, for example through postal mail or email.

B. Notice of the Statement

Notice of the Statement may only be used to deliver Notice on a Wireless Device and should be clear and easily accessible to the Consumer. If the Wireless Service Provider provides the full privacy statement on the Wireless Device, the Notice of the Statement is not required.

1. Content Requirement: The Notice of the Statement should include the URL or link to the Full Privacy Statement or the Supplemental Privacy Statement on the Wireless Service Provider website.
2. Delivery Requirements:
 - a. In instances where viewing technology is based on optimized protocols utilizing a proxy server between the device and content source, such as WAP, the Notice of the Statement should be delivered as follows:
 - i. The Wireless Service should include a “Privacy” option which includes the word “Privacy” in the title;
 - ii. When the Consumer selects the “Privacy” option, the URL or link to the Full Privacy Statement or the Supplemental Privacy Statement on the Wireless Service Provider website should be presented;
 - b. In instances where the Wireless Service Provider does not have control over the contents of the menu, it will recommend to its partner providing the service or the application developer that the Privacy option be placed on the menu.
 - c. In instances where plain text or rich text messages are delivered using network components to push the message to the device when the device is available to receive the message, such as SMS, the Notice of the Statement should be delivered as follows:
 - i. The Wireless Service Provider will send the Notice of the Statement to the Wireless Device, to the extent practical at no charge at the time the Consumer signs up for the service, unless the Full Privacy Statement has been provided by another means.

C. Supplemental Privacy Statement

The Supplemental Privacy Statement may be used to communicate unique elements of a distinct and separate Wireless Service that are not included in the Wireless Service Provider's existing Full Privacy Statement. The Supplemental Privacy Statement may be integrated with the Full Privacy Statement or maintained separately. It should always be available prominently on the Wireless Service Provider website, and may be identified by the presence of a Wireless Privacy Seal.

1. Content Requirements: The Supplemental Privacy Statement should include:
 - a. New data types collected, e.g. Location Information, unique mobile device identifier;
 - b. New data uses, e.g. sharing of Location Information with Location Based Service provider;
 - c. Methods for editing relevant privacy settings, if available;
 - d. URL or link to the Full Privacy Statement maintained on the Wireless Service Provider's web site.
2. Delivery Requirements: The Supplemental Privacy Statement should be delivered as follows:
 - a. If a Transaction is conducted offline, the Wireless Service Provider should do at least one of the following:
 - i. Deliver the Supplemental Privacy Statement separately;
 - ii. Include the Supplemental Privacy Statement in product brochures or the service contract for the new Wireless Service; or
 - iii. Include the URL of the web page where the Supplemental Privacy Statement is located in the product brochure or service contract for the new Wireless Service
 - b. If a Transaction is conducted online, but not on a Wireless Device, the Wireless Service Provider should provide a link to the web page where the Supplemental Privacy Statement is located
 - c. If a Transaction is conducted on a Wireless Device, the Wireless Service Provider should do at least one of the following:
 - i. Deliver the Notice of the Statement; or
 - ii. Deliver the Supplemental Privacy Statement, as soon as practical, in an appropriate medium, for example through postal mail or email.

D. Notice of Material Change

The Notice of a Material Change should be given prior to implementing the change. The Notice of a Material Change should be provided to affected Consumers.

1. Content Requirements: The Notice of a Material Change should include:
 - a. Effective date of change
 - b. URL or link to the modified Full Privacy Statement
2. Delivery Requirements: The Notice of a Material Change may delivered using either (a) or (b) below:
 - a. Outbound Communication:
 - i. Wireless Service Provider should send an outbound communication to the affected Consumers that can be accessed via the Wireless Device at least 14 days prior to the implementation. This communication may be in the form of an email message, SMS, or voice message.

- ii. As an additional courtesy, the Wireless Service Provider may also send written notification of a material change to the Consumer's physical address or emailed to the consumer.
- b. General Posting:
 - i. Wireless Service Provider should post prominent notices on the web site for 30 calendar days prior to the implementation of the Material Change and inform Consumer how to exercise any applicable choice.
 - ii. When technologically feasible, the Wireless Service Provider should post prominent notices on the Wireless Device for 30 calendar days prior to the implementation of the Material Change and inform the Consumer how to exercise any applicable choice.
 - iii. When technically feasible, the Consumer should not be charged a fee by the Wireless Service Provider for messages sent to the Wireless Device that concern a Notice of Material Change.

II. CHOICE:

Principle: A Wireless Service Provider should provide choice for Third Party sharing and any Secondary Use of Personally Identifiable Information both at the time of collection and on an ongoing basis, so that the Consumer may modify choice over time. A Wireless Service Provider should provide the Consumer who has signed up to location based services with Opt-In Choice for Secondary Uses and disclosure of Location Information to Third Parties.

- A. If Location Information is collected, used or disclosed by a Wireless Service Provider, Opt-In Choice should be provided to the Consumer for Secondary Uses or Third Party disclosures for Secondary Uses.
- B. Opt-Out Choice may be used by a Wireless Service Provider to use Personally Identifiable Information for Secondary Purposes.
- C. Opt-in Choice should be used by a Wireless Service Provider prior to disclosure of Personally Identifiable Information to a Third Party for Secondary Uses.
- D. A Wireless Service Provider is not required to provide choice to the Consumer when providing enhanced 911 service.
- E. For administrative uses, such as notification of updates to Privacy Statement, changes to terms of service, administrative surveys, a Wireless Service Provider need not provide choice to the Consumer.
- F. When the collection, use and/or disclosure of Personally Identifiable Information or Location Information is necessary to fulfill the request of the Consumer request, such as a credit authorization for a purchase or the downloading of digital goods to a Wireless Device, a Wireless Service Provider need not provide choice to the Consumer.

Implementation Guidelines

A. Choice for Personally Identifiable Information other than Location Information.

Choice should be made as simple and easy to understand as possible; therefore use of double negatives and other confusing methods are discouraged. Opt-in Choice should be implemented for sharing with Third Parties for Secondary Purposes. Opt-out Choice should be implemented for Secondary Uses.

- 1. Timing
 - a. Choice should be offered before or at the time the Personally Identifiable Information is collected
 - b. Choice should be given prior to sharing Personally Identifiable Information with third parties

2. Initial choice for a Wireless Service may be delivered in any medium, i.e. laptop/desktop computer, Wireless Device, or hardcopy.
3. Accessing and Modifying Choice
 - a. The Consumer should be able to modify choice at any time. Access may be provided in a variety of ways, including a desktop/laptop computer, Wireless Device, or customer service telephone number.
 - b. Modifying Choice by Responding to Secondary Use Messages
 - i. Messages where the Consumer has specifically Opted-in to receive the messages
 - A. If the Consumer has consented to receive Secondary Use messages via Opt-In Choice on a Wireless Device, the Wireless Service Provider may allow the Consumer to modify choice via a set method, for example only on a laptop/desktop computer. The Notice of such constraints at the time of the Opt-In Choice should be clear and conspicuous.
 - B. To the extent technically feasible, the Consumer should not be charged a fee by the Wireless Service Provider for responding to Secondary Use messages sent to Wireless Devices when modifying choice.
 - ii. Messages where the Consumer has NOT specifically Opted-in to receive messages
 - A. If the Consumer receives Secondary Use messages via Opt-Out Choice on a Wireless Device, the Wireless Service Provider should allow the Consumer to modify choice via the same medium the Consumer receives the messages, e.g. SMS, email, etc.
 - B. To the extent technically feasible, the Consumer should not be charged a fee by the Wireless Service Provider for responding to Secondary Use messages sent to Wireless Devices when modifying choice.

B. Choice for Location Information

For Wireless Devices and Wireless Services that use Location Information, the Consumer should be allowed to control use and sharing through an Opt-In Choice.

1. Timing
 - a. Choice should be offered before or at the time the Location Information is collected
 - b. Choice should be given prior to sharing Location Information with third parties
2. Subscription -Level Permissions for GPS (Global Positioning System)-enabled Devices
 - a. Subscriptions utilizing GPS capability should not be engaged until the Consumer turns the subscription on or opts in to the GPS-enabled application.
 - b. The Wireless Service Provider, to the extent possible, should provide clear and easily found instructions for changing the settings for Location Information:
 - i. Available via the main menu of the Wireless Device,
 - ii. Available in the user manual of the Wireless Device, or
 - iii. In the menu of the specific GPS-enabled application on the Wireless device.
 - c. In instances where the Consumer is using an application where the location can be found by a third party, the Wireless Device should display either
 - i. a notice on the primary screen of the application indicating the setting of the Location Information function or
 - ii. a persistent indicator of the Location Information function on the main screen of the Wireless Device.
3. Application-Level Permissions
 - a. Wireless Service Provider can collect, use and/or disclose Location Information for whatever purpose and duration is authorized via the Opt-In Choice

III. DATA INTEGRITY

Principle: Wireless Service Provider shall take reasonable steps when collecting, creating, maintaining, using, disclosing or distributing Personally Identifiable Information not collected directly from the Consumer to assure that the data are accurate, complete and timely for the purposes for which they are to be used.

IV. ACCESS

Principle: Wireless Service Providers should implement reasonable and appropriate processes or mechanisms to allow the Consumer to correct inaccuracies in Personally Identifiable Information, such as account, transaction, or contact information. These processes or mechanisms should be simple and easy to use, and should result in confirmation to the Consumer that inaccuracies have been corrected.

V. RETENTION

Principle: If appropriate, the Wireless Service Provider should disclose the fact that it retains Location Information beyond the period reasonably needed to complete the Transaction requested by the Consumer.

VI. SECURITY

Principle: Wireless Service Providers should implement reasonable procedures to protect Personally Identifiable Information within its control from unauthorized use, access, disclosure, or alteration. If Wireless Service Providers collect and retain Personally Identifiable Information, they should utilize appropriate commercially reasonable practices, such as encryption, to secure that information.

VII. REDRESS

Principle: The Consumer should have an effective and efficient mechanism for complaining and submitting disputes about the application of these Wireless Privacy Principles and Implementation Guidelines. Wireless Service Providers should provide a mechanism for handling and escalating privacy complaints. In cases where a Wireless Service Provider states that its privacy practices have been certified by a Third Party, the Consumer should be able to easily verify that certification. Company should respond to all such submissions in a timely fashion, not to exceed ten (10) business days.

APPENDIX 1: Definitions

Agent: A third party that, under contract with a Wireless Service Provider, performs or assists in the performance of a function or activity involving the collection, use, or disclosure of Personally Identifiable Information on behalf of that Wireless Service Provider.

Consumer: The Consumer is the individual user of an internet/data-enabled Wireless Device who uses that device to engage Wireless Services. A Consumer does not include an individual using a Wireless Device where a business or government entity is financially responsible for the individual's Wireless Services, such as in employer-employee relationship.

Full Privacy Statement: The Full Privacy Statement includes the privacy practices established by a Wireless Service Provider for collecting, using and maintaining Personally Identifiable Information that is generated as a result of engaging in Wireless Services.

Location Information: Location Information is information relating to the location of the Consumer as generated using the capabilities of a Wireless Device to provide a specific service other than the placing and receiving of voice calls.

Material Change: Material Change is any modification to the Full Privacy Statement involving the collection, use or disclosure of Personally Identifiable Information generated as a result of the Consumer's engaging in Wireless Services.

Notice of the Statement: The Notice of the Statement is the statement provided on a Wireless Device when device constraints limit the ability to effectively display the Full Privacy Statement or the Supplemental Privacy Statement.

Opt-In Consent/Choice: Opt-In Consent/Choice is confirmed approval by the Consumer, after notice by a Wireless Service Provider, prior to the collection, use, or disclosure of Personally Identifiable Information.

Opt-Out Consent/Choice: Opt-Out Consent/Choice is notification by the Consumer to a Wireless Service Provider, after Notice by the Wireless Service Provider that the Consumer does not wish to have Personally Identifiable Information collected, used, or disclosed.

Personally Identifiable Information: Personally Identifiable Information is any information (i) that identifies or can be used to identify, contact, or locate the person to whom such information pertains, or (ii) from which identification or contact information of that person can be derived, and that is generated as a result of the Consumer's engaging in Wireless Services. Personally Identifiable Information includes both information *about* the Consumer, e.g. name, address, social security number, personal profile, unique identifier, as well as information *used by* the Consumer, e.g. email address, username, IP address, and Location Information. Personally Identifiable Information does not include information that is collected anonymously (i.e., without identification of the person) or demographic information not connected to the person.

Primary Use: Primary Use is the use of information to complete a Transaction or provide a Wireless Service at the request of the Consumer.

Secondary Uses: Secondary Uses are uses which are not specifically related to a Transaction the Consumer has requested, for example marketing new services and products.

Supplemental Privacy Statement: The Supplemental Privacy Statement is used to communicate unique elements of a wireless feature/application that are not included in the Wireless Service Provider's Full Privacy Statement.

Third Party: Any commercial entity that is unrelated by corporate structure to a Wireless Service Provider and that is not acting as the Wireless Service Provider's Agent.

Transaction: The process by which the Consumer establishes a formal relationship with a Wireless Service Provider and in which the Consumer provides Personally Identifiable Information, or a method for enabling the Wireless Service Provider to contact the Consumer, in the future. Examples of a

Transaction includes purchasing a Wireless Device, subscribing to the services of a Wireless Service Provider or registering for a wireless internet service like weather or stock alerts provided by a Wireless Service Provider.

Wireless Device: Wireless Device is a telephone handset, Personal Digital Handset (PDA), or other similar handheld device that allows the Consumer to access the internet and/or wireless data services.

Wireless Services: Wireless Services are any services provided to a Wireless Device other than the placing and receiving of voice calls.

APPENDIX 2: Ongoing Areas of Development

The following are areas that TRUSTe and the Wireless Advisory Committee may research, monitor and/or review at a later date.

Notice and Choice. As technology evolves, TRUSTe and the Wireless Advisory Committee may review new options for more prominently displaying Notice and Choice on Wireless Devices. Additionally, as short form notices become more widely accepted by regulators, we will review how to incorporate into the principles, particularly for notice provided in an offline context.

New Technology. As new technology is introduced, TRUSTe and the Wireless Advisory Committee may review what type of Notice and Choice are appropriate. In particular, the Committee will monitor location settings for GPS enabled devices for different technology platforms.

Storage of Location Information. TRUSTe and the Wireless Advisory Committee may review and make recommendations for security practices related to Location Information, as appropriate.

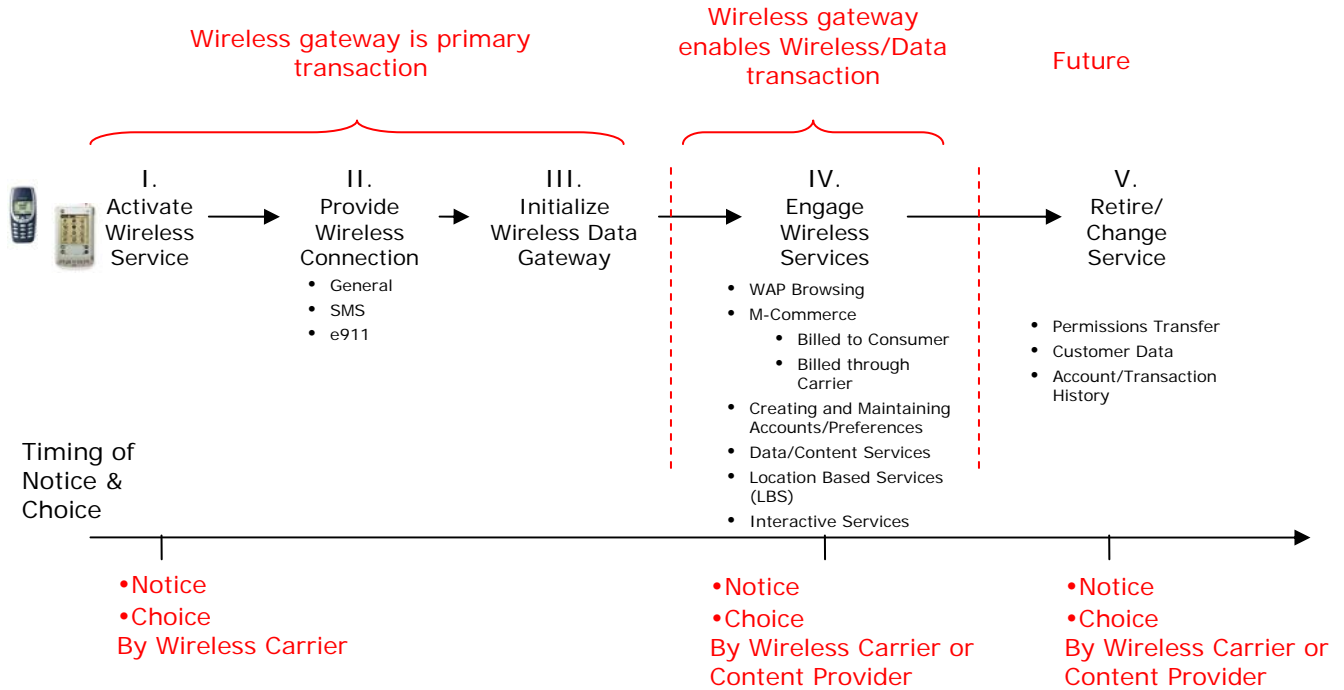
Security. TRUSTe and the Wireless Advisory Committee may research, review and make recommendations related to security practices to address the unique concerns in the wireless medium.

Advertising. As advertisers and marketers find new ways of using the wireless medium to reach the Consumer, TRUSTe and the Wireless Advisory Committee may review those practices and make appropriate recommendations.

Use of Other Wireless Protocols. TRUSTe and the Wireless Advisory Committee may review and consider addressing other wireless protocols in the next version of the Wireless Privacy Principles and Implementation Guidelines.

Collection of Children's Information. TRUSTe and the Wireless Advisory Committee may review issues that arise out of the collection of children's information.

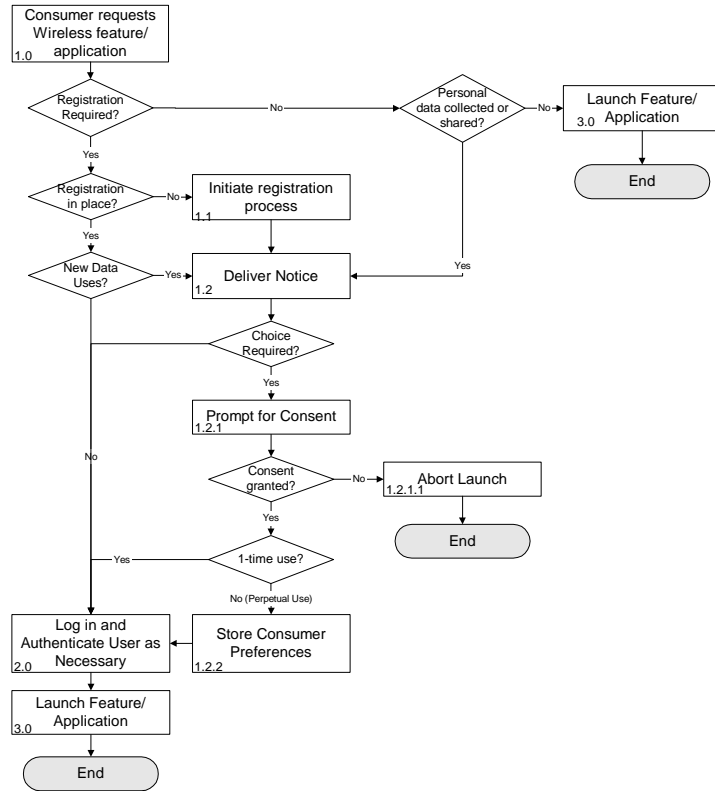
APPENDIX 3: Example of a Lifecycle of the Mobile Consumer



APPENDIX 4:**Examples of Wireless Services involving Personally Identifiable Information**

- **Location Based Services**
 - **Description:** Applications or features that use the real-time location of the device, provided by the carrier or the device, to customize content delivery for the Consumer.
 - **Examples:** Locate people, ATMs, restaurants;
- **Digital/Data Downloads**
 - **Description:** The handset or PDA is used to access digital products for use on the device. Charges may be associated with this.
 - **Examples:** Ring-tones, games, office applications
- **Subscriber Messages/Alerts/Notifications**
 - **Description:** The wireless subscriber requests information to be sent to their device. This information may be delivered in a variety of formats, including short message service (SMS), multimedia message service (MMS), photographs, etc.
 - **Examples:** Request stock updates, weather updates, news updates, daily horoscope, IM integration
- **Wireless Web**
 - **Description:** Use of handset or PDA to access the wireless web much as one would do with a desktop or personal computer.
 - **Example:** Search wireless websites, make reservations, purchase products
- **M-commerce**
 - **Description:** The device is used to manage payment of goods (digital or physical) by providing payment information through the device or confirming payment through a third party, e.g. the wireless Carrier.
 - **Examples:** Pay for book on a retail site with 1-click-mobile, purchase handset accessories and bill through wireless Carrier, place a bet, etc.
- **User-generated content**
 - **Description:** Use of handset or PDA to compose original content.
 - **Example:** Take and send a photo, compose and send an SMS, MMS, email

APPENDIX 5: Example Flowchart for Administering Wireless Notice and Choice



Notes:

Step 1.0

Examples include (filenames in blue):

- Adding mobile mail to internet account: See [Yahoo!](#) and [MSN](#) examples ([NoticeReg-Yahoomail](#), [NoticeReg-MSNMobile](#))
- Registering for SMS alerts
- Using a location based service (LBS): See [Go2](#) example ([NoticeReg-Go2](#))

Step 1.2 and 3.0

Examples include:

- Full Notice-PC: See [MSN](#) example ([NoticeReg-MSNMobile](#))
- Supplemental Notice-Handset: See [ATT](#) example ([NoticeUse-ATT-FindFriends](#))
- Notice of the Statement-Handset: See [Vindigo](#) example ([NoticeUse-Vindigo](#))

Step 1.2.1

Examples include:

- 1-time Use: See [Go2](#) example ([ChoiceLoc-Go2](#))
- Perpetual Use: See [10Best](#) example ([ChoiceLoc-10Best](#))
- 3rd Party Messages: See [Go2](#) example ([Choice3rd-Go2](#))

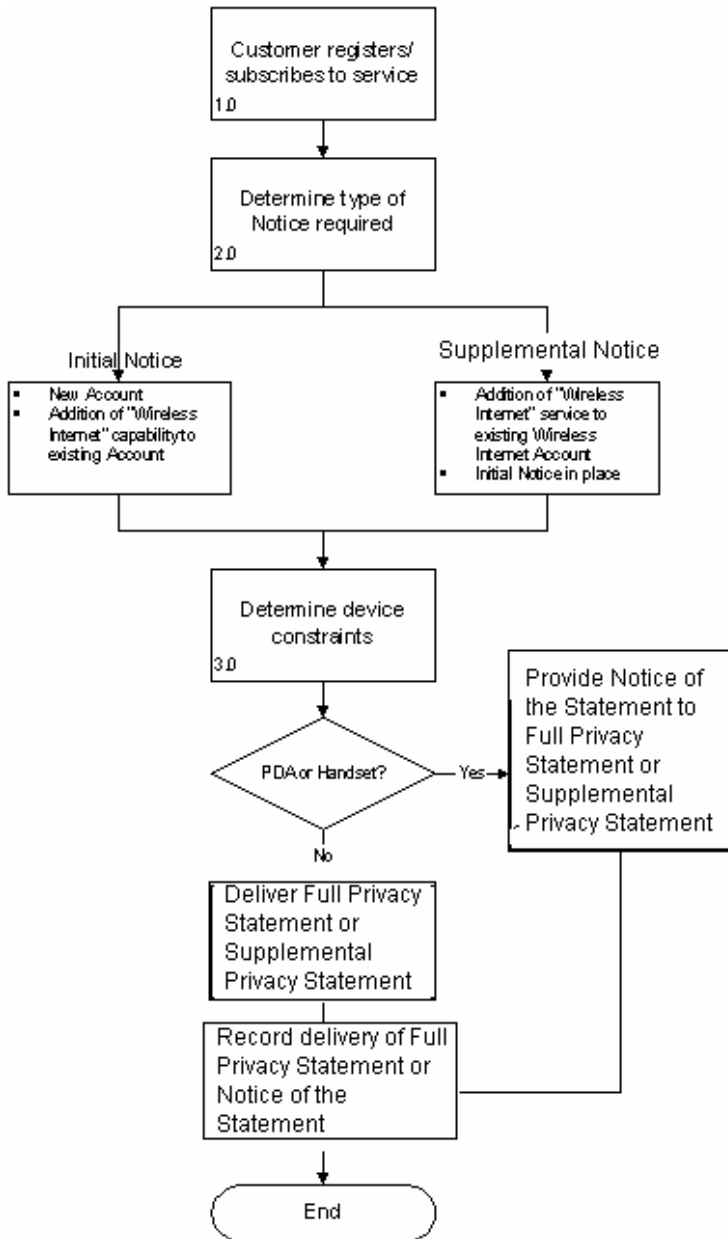
Wireless simulations can be accessed as follows:

<http://truste.org/wireless/>

Username: twire

Password: w1r3dn0w

APPENDIX 6: Example Registration/Subscription Flow Chart



APPENDIX 7: Examples of Choice

The following examples are methods of offering Choice to the Consumer on a desktop or laptop computer. The equivalent may be exercised on Wireless Devices by asking “yes” or “no” questions. The Wireless Advisory Committee believes using Non-Default Choice Statements is a more robust form of providing consumer Choice.

Non-Default Choice Statements:

I would like to receive promotional announcements.

Yes No

Customer must **check one of the two boxes to opt-in or opt-out** of receiving promotional announcements and cannot go forward until a selection has been made.

Default Choice Statements:

Yes, please send me promotional announcements.

Yes, please send me promotional announcements.

No, do not send me promotional announcements.

No, do not send me promotional announcements.

Customer must **uncheck the box to opt-out** of receiving promotional announcements.

Customer must **check the box to opt-in** to receiving promotional announcements.

Customer must **uncheck the box to opt-in** to receiving promotional announcements.

Customer must **check the box to opt-out** of receiving promotional announcements.