

**APPENDIX B:
SURVEY SAMPLES, RESULTS,
AND INSTRUCTIONS**

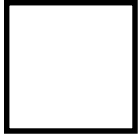
Random Sample Site List & Survey Forms

www.123inc.com
www.12c4.com
www.180096hotel.com
www.1wrestling.com
www.555-1212.com
www.7search.com
www.800.com
www.800chat.com
www.800florals.com
www.8op.com
www.aa.com
www.abcdistributing.com
www.accessarizona.com
www.activision.com
www.adatom.com
www.adoption.com
www.afreegreetingcard.com
www.africana.com
www.alaskaairlines.com
www.albertsons.com
www.algore2000.com
www.all-ink.com
www.amarillonet.com
www.americanfunds.com
www.ancestry.com
www.andysgarage.com
www.anglefire.com
www.ant.com
www.apcc.com
www.archiecomics.com
www.ardemgaz.com
www.armchairmillionaire.com
www.asd.com
www.ask.com
www.askmerrill.com
www.atlastravelweb.com
www.atomfilms.com
www.attitude99.com
www.atyouroffice.com
www.audiocard.com
www.autoaccessory.com
www.avault.com
www.babiesrus.com
www.babynames.com
www.bbandt.com
www.be.com
www.bellsouth.com
www.bibliofind.com
www.bigplanet.com
www.bizrate.com
www.blairwitch.com
www.bluemountain.com
www.bobbrinker.com
www.borders.com
www.bottlerocket.com
www.bravotv.com
www.brilliantpeople.com
www.britney.com
www.c4.com
www.cai.com
www.calendarlive.com
www.camalott.com
www.cardemporium.com
www.carfinance.com
www.cbot.com
www.ceoexpress.com
www.channel1.com
www.charityfrogs.com
www.chartshop.com
www.checkout.com
www.checksinthemail.com
www.childrensplace.com
www.chryslerfinancial.com
www.cinemark.com
www.clubphoto.com
www.cnet.com
www.commissioner.com
www.compgeeks.com
www.compuserve.com
www.connect-to.com
www.connect2music.com
www.continental.com
www.cosmomag.com
www.costco.com

www.courier-journal.com
www.courtvt.com
www.craftassoc.com
www.crafterscommunity.com
www.creaf.com
www.crestar.com
www.crosswalk.com
www.cwssubscribe.com
www.cyber-nation.com
www.cybercities.com
www.datingclub.com
www.dawsonscreek.com
www.daytimer.com
www.decipher.com
www.deerlake.com
www.dellauction.com
www.delphi.com
www.deltavacations.com
www.digitalcity.com
www.discoveromaha.com
www.divorcesource.com
www.dollar.com
www.driveoldsmobile.com
www.drlaura.com
www.eakles.com
www.earlyamerica.com
www.eidosinteractive.com
www.emusic.com
www.epicgames.com
www.etown.com
www.ezthemes.com
www.familymoney.com
www.fidelity.com
www.findlaw.com
www.findwhat.com
www.firstauction.com
www.fishermansnet.com
www.flyaow.com
www.foxnews.com
www.franklincovey.com
www.freecreditreport.com
www.freei.com
www.freemac.com
www.ftd.com
www.funone.com
www.gamegenie.com
www.garfield.com
www.gear.com
www.getsmart.com
www.gmc.com
www.go2orlando.com
www.gocampingamerica.com
www.gocarolinas.com
www.goldenfeather.com
www.goodhome.com
www.goofball.com
www.greatdomains.com
www.greatoutdoors.com
www.grizzly.com
www.grolier.com
www.gurl.com
www.guru.com
www.handspring.com
www.harborfreight.com
www.harryanddavid.com
www.hawaiianair.com
www.healthgrades.com
www.healthquick.com
www.heartwarmers4u.com
www.historyplace.com
www.holiday-inn.com
www.hollowww.com
www.homegain.com
www.homepage.com
www.hotjobs.com
www.huntington.com
www.ibm.com
www.individualinvestor.com
www.infoarea.com
www.insidetheweb.com
www.intel.com
www.inter800.com
www.invesco.com
www.investoroutlook.com
www.iparty.com
www.iqtest.com
www.irs.com
www.iturf.com
www.ivillage.com
www.iwarp.com

www.jack.com
www.janus.com
www.javascript.com
www.jcpenney.com
www.jfax.com
www.jokes.com
www.katv.com
www.kidrock.com
www.kidscamps.com
www.knowledgeadventure.com
www.korn.com
www.krause.com
www.krmediastream.com
www.kron.com
www.lasvegassun.com
www.lessonplanz.com
www.limp-bizkit.com
www.linux.com
www.localeyes.com
www.lockergnome.com
www.lovequote.com
www.malonefreightlines.com
www.marvel.com
www.mazdausa.com
www.meade.com
www.memolink.com
www.merck-medco.com
www.mervyns.com
www.mexonline.com
www.missingkids.com
www.montelshow.com
www.more.com
www.mortgage101.com
www.musictoday.com
www.myhelpdesk.com
www.nandotimes.com
www.nationjob.com
www.ndb.com
www.netnoir.com
www.netscape.com
www.netsrq.com
www.newjoke.com
www.newsdirectory.com
www.nflshop.com
www.nissan-usa.com
www.northernlights.com
www.ny-lotto.com
www.oag.com
www.officeclick.com
www.officemax.com
www.ohwy.com
www.olsten.com
www.osmond.com
www.outsource2000.com
www.p1cs.com
www.pacbell.com
www.painewebber.com
www.palm.com
www.palmgear.com
www.pcguide.com
www.pcwebopedia.com
www.peoplesearch.com
www.performancebike.com
www.pga.com
www.phantomstar.com
www.photoisland.com
www.photoloft.com
www.physique.com
www.playbill.com
www.playstation.com
www.pollg.com
www.potterybarn.com
www.pricewatch.com
www.prodreg.com
www.publicdata.com
www.quepasa.com
www.quickbooks.com
www.quintcareers.com
www.rampage.com
www.realty.com
www.reebok.com
www remodel.com
www.renegadeolga.com
www.repriserec.com
www.resobase.com
www.reversephonedirectory.com
www.riddler.com
www.rogerwilco.com
www.roughguides.com
www.savvysearch.com

www.sbc.com
www.scoopswrestling.com
www.scream3music.com
www.semaphorecorp.com
www.server.com
www.sfnb.com
www.shaklee.com
www.sharperimage.com
www.shoplet.com
www.showtimeonline.com
www.sitemeter.com
www.smartcollecting.com
www.smartshop1.com
www.snopes.com
www.soapnet.com
www.soapoperadigest.com
www.social-security-number.com
www.softseek.com
www.speedbit.com
www.spiegel.com
www.sportsline.com
www.stampsonline.com
www.starlingtech.com
www.startrekcontinuum.com
www.stonecold.com
www.stonetemplepilots.com
www.surfsouth.com
www.sweepstakesonline.com
www.swiftsite.com
www.techguide.com
www.teen.com
www.teldir.com
www.theknot.com
www.themailbox.com
www.thetrip.com
www.theultimates.com
www.thomas.com
www.tir.com
www.todayssports.com
www.top-25.com
www.topps.com
www.topscreensavers.com
www.townnews.com
www.travelnow.com
www.tylenol.com
www.unitedmedia.com
www.usatoday.com
www.utrade.com
www.valic.com
www.vcall.com
www.verio.com
www.vintage-mustang.com
www.virtuallyshopping.com
www.vitaminshoppe.com
www.vrbo.com
www.warnerbros.com
www.webcom.com
www.webriot.com
www.websponsors.com
www.webvan.com
www.westlaw.com
www.whymilk.com
www.winternet.com
www.woodmagazine.com
www.worldnetdaily.com
www.wrestlingplanet.com
www.yamahausa.com
www.year2000.com
www.ym.com
www.ynot.com
www.zianet.com



Federal Trade Commission
2000 Online Privacy Survey

ID # _____

Surf Survey Form

Surfer's Name _____ Date _____

Assigned Domain (URL) [Random Sample Results] _____

PART 1 - SCREENING

Instructions:

- (1) Are you unable to access this URL?

IF YES, STOP HERE and **RECORD** a "U" in the box at upper left.
Then **GO** to your next assigned URL.

- (2) Is the domain an "adult site?"

IF YES, STOP HERE and **RECORD** an "A" in the box at upper left.
Then **GO** to your next assigned URL.

- (3) Is the domain *directed to children under 13*?

IF YES, STOP HERE and **RECORD** "K" in the box at upper left.
Then **GO** to your next assigned URL.

If you answered NO to (1) through (3), WRITE the domain's ID Number on a folder. **PRINT** the home page, **WRITE** the domain's ID Number on it, and **PLACE** it in the folder.

Then you're ready to **GO** to **Survey Question 1**.

PART 2 - DOMAIN ATTRIBUTES

Instructions: Circle **NO** or **YES** for each question below unless instructed to skip the question. **NO YES**

Q1 Is a **PRIVACY SEAL** posted on this domain? **308 27**

Examples:

TRUSTe PriceWaterhouseCoopers *BetterWeb*
CPA WebTrust ESRB *Privacy Online Certified*
BBBOnline Privacy

Other (write in): _____
(Consult a proctor before relying upon “other” to answer YES to this question.)

Q2 Is a **PRIVACY POLICY** posted on this domain? **128 207**

If **NO**, **SKIP** to **Question #4**.

If **YES**, **PRINT** the entire Privacy Policy, **WRITE** the domain’s ID Number on it, and **PLACE** it in the folder. If you cannot print the Privacy Policy, **ASK** a proctor for assistance. If the Privacy Policy cannot be printed, **COPY** it in its entirety in **Part 3** of this form (be sure to **RECORD** the URL(s) where the Privacy Policy appears). Then **GO** to **Question #3**.

Q3 Is there a **LINK** to the Privacy Policy on this domain’s home page? **50 157**

Examples: icon or highlighted text

Q4 Is one or more **INFORMATION PRACTICE STATEMENT(S) (IPS)** posted on this domain? **71 264**

If **NO**, **GO** to **Question #5**.

If **YES**, **PRINT ALL** Information Practice Statements, **WRITE** the domain’s ID Number on each page you print, **HIGHLIGHT** the Information Practice Statement, and **PLACE** the page in the folder. If you cannot print an Information Practice Statement, **ASK** a proctor for assistance. If the Information Practice Statement cannot be printed, **COPY** it in its entirety in **Part 3** of this form (be sure to **RECORD** the URL where the Information Practice Statement(s) appears). Then **GO** to **Question #5**.

Instructions: Circle **NO** or **YES** for each question below unless instructed to skip the question. **NO YES**

Q5 Does the domain collect **EMAIL ADDRESSES**? **15 320**

Q6 Does the domain collect **PERSONAL IDENTIFYING INFORMATION other than email address**? **44 291**

Examples:

Name	Fax Number
Postal Address	Credit Card Number
Telephone Number	Social Security Number

Other (write in): _____
(Consult a proctor before relying upon “other” to answer YES to this question.)

Q7 Does the domain collect **NON-IDENTIFYING INFORMATION**? **108 227**

Examples:

Age/Date of Birth	Occupation
Gender	Interests or hobbies
Education	Type of hardware/software using
ZIP Code, but not an address	Income

Other (write in): _____
(Consult a proctor before relying upon “other” to answer YES to this question.)

STOP

Go to your next assigned URL.

PART 3 - NOTES

Instructions: Use this space to record any privacy policy or information practice statement that cannot be printed.

URL _____

Federal Trade Commission
2000 Online Privacy Survey

ID # _____

Third-Party Cookie Survey Form

Surfer's Name _____	Date _____
Assigned Domain (URL) [Random Sample Results] _____	

Instructions: Circle NO or YES.

NO YES

Q8 Is a **THIRD PARTY** (i.e., any domain **OTHER THAN** the domain you are currently visiting) attempting to place a cookie at this domain?

143 192

IF YES, record the URL of the third party attempting to place the cookie:

STOP

Go to your next assigned URL.

Federal Trade Commission
2000 Online Privacy Survey

ID # _____

Content Analysis Form

Content Analyst's Name _____	Date _____
Content Analyst's Name _____	
Assigned Domain (URL) [Random Sample Results] _____	

Instructions: Circle NO or YES for each question below unless otherwise instructed.

PART 1 - NOTICE

		NO	YES
Q9	Does the Privacy Policy/Information Practice Statement contain a declaration that the domain does NOT collect any personal information from consumers?	294	1
	[If the Privacy Policy/Information Practice Statement contains such a declaration, answer YES. If it does not contain such a declaration, answer NO.]		
	If NO, GO to Question #10. If YES, SKIP to Question #24.		
Q10	Does the Privacy Policy/Information Practice Statement say anything about what specific personal information the domain collects from consumers?	71	223

PART 2 - INTERNAL USE: NOTICE AND CHOICE

Q11	Does the Privacy Policy/ Information Practice Statement say anything about how the domain may use personal information it collects for internal purposes?	NO	YES
		26	268

If NO, SKIP to Question #15.
If YES, GO to Question #12.

Q12	Does the Privacy Policy/Information Practice Statement say anything about whether the domain uses personal information it collects to send communications to the consumer?	13	255
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If NO, SKIP to Question #15.
If YES, GO to Question #13.

Q13 Choose **ONE** of the following options and **CIRCLE the number corresponding to your choice.**

The Privacy Policy/Information Practice Statement . . .	CIRCLE ONE
says that the domain does or may use personal information to send communications to the consumer (other than those directly related to processing an order or responding to a consumer's question).	243
says that the domain does not use personal information to send communications to the consumer (other than those directly related to processing an order or responding to a consumer's question).	12

IF YOU CHOSE #1 to this question, GO to Question #14.
IF YOU CHOSE #2 to this question, SKIP to Question #15.

Q14 Choose **ONE** of the following options and **CIRCLE the number corresponding to your choice.**

- | | |
|---|-------------------|
| The Privacy Policy/Information Practice Statement . . . | CIRCLE ONE |
| says that the domain provides consumers an opportunity to opt in to receiving future communications from the domain (other than those directly related to processing an order or responding to a consumer’s question). | 55 |
| says that the domain provides consumers an opportunity to opt out of receiving future communications from the domain (other than those directly related to processing an order or responding to a consumer’s question). | 155 |
| says that the domain requires consent or offers a choice with respect to receiving future communications from the domain (other than those directly related to processing an order or responding to a consumer’s question), but does not make clear whether the choice is opt-in or opt-out. | 9 |
| does not say anything about offering consumers choice with respect to receiving future communications from the domain (other than those directly related to processing an order or responding to a consumer’s question). | 244 |

PART 3 - DISCLOSURES TO THIRD PARTIES: NOTICE AND CHOICE

Q15 Does the Privacy Policy/Information Practice Statement say anything about whether the domain discloses personal information it collects to third parties?	NO	YES
	52	242

If NO, SKIP to Question #18.
If YES, GO to Question #16.

Q16 Choose **ONE** of the following options and **CIRCLE the number corresponding to your choice.** **CIRCLE ONE**

The Privacy Policy/Information Practice Statement . . .

says that the domain **does or may** disclose **personal identifying information to third parties.** **169**

says that the domain **does NOT disclose personal identifying information to third parties, or does so only:**

- (a) as required by law,
- (b) as necessary to process an order, and/or
- (c) in aggregate or non-identifying form. **73**

IF YOU CHOSE #1 to this question, **GO to Question #17.**
IF YOU CHOSE #2 to this question, **SKIP to Question #18.**

Q17 Choose **ONE** of the following options and **CIRCLE the number corresponding to your choice.**

The Privacy Policy/Information Practice Statement . . . **CIRCLE ONE**

says that the domain provides consumers an opportunity to **opt in** to the disclosure of **personal identifying information** to third parties. **14**

says that the domain provides consumers an opportunity to **opt out** of the disclosure of **personal identifying information** to third parties. **274**

says that the domain requires **consent or offers a choice** with respect to the disclosure of **personal identifying information** to third parties, but **does not make clear** whether the choice is opt-in or opt-out. **37**

does not say anything about offering consumers **choice** with respect to disclosure of **personal identifying information** to third parties. **44**

PART 4 - ACCESS

		NO	YES
Q18	Does the Privacy Policy/Information Practice Statement say that the domain allows consumers to review at least some personal information about them?	227	67
Q19	Does the Privacy Policy/Information Practice Statement say that the domain allows consumers to have inaccuracies corrected in at least some personal information about them?	174	120
Q20	Does the Privacy Policy/Information Practice Statement say that it allows consumers to have at least some personal information about them deleted from the domain's records?	237	57

PART 5 - SECURITY

Q21	Does the Privacy Policy/Information Practice Statement say that the domain takes any steps to provide security?	114	180
	If NO, SKIP to Question #24. If YES, GO to Question #22.		
Q22	Does the Privacy Policy/Information Practice Statement say that the domain takes steps to provide security , for personal information the domain collects, during transmission of the information from the consumer to the domain? Example: Secure Socket Layer Technology or SSL	55	125
Q23	Does the Privacy Policy/Information Practice Statement say that the domain takes steps to provide security , for personal information the domain has collected, after the domain has received the information (i.e., not during transmission, but after collection)?	87	93

PART 6 - COOKIES

Q24 Does the Privacy Policy/Information Practice Statement say **anything about whether the DOMAIN places cookies?** **NO YES**
142 153

If NO, SKIP to Question #26.
If YES, GO to Question #25.

Q25 Choose **ONE** of the following options and **CIRCLE the number corresponding to your choice.**

The Privacy Policy/Information Practice Statement . . . **CIRCLE ONE**
says that the domain **does or may** place cookies. **147**
says that the domain **does not** place cookies. **6**

Q26 Does the Privacy Policy/Information Practice Statement say **anything about whether THIRD PARTIES may place cookies** and/or collect personal information on the domain? **NO YES**
246 48

If NO, STOP!
Review your answers for **accuracy** and to ensure that all questions were **answered or skipped appropriately.**
Then, **Go to your next folder.**

If YES, GO to Question #27.

Q27 Choose **ONE** of the following options and **CIRCLE the number corresponding to your choice.**

The Privacy Policy/Information Practice Statement . . . **CIRCLE ONE**
says that third parties **do or may** place cookies and/or collect personal information on the domain. **48**
says that third parties **do not** place cookies and/or collect personal information on the domain. **0**

STOP!

Review your answers for **accuracy** and to ensure that all questions were **answered or skipped appropriately**.
Then, **Go to your next folder**.

Most Popular Group Site List & Survey Forms

www.1800ussearch.com	www.justsaywow.com
www.about.com	www.kbb.com
www.adobe.com	www.looksmart.com
www.alexa.com	www.lycos.com
www.alladvantage.com	www.macromedia.com
www.altavista.com	www.mailbits.com
www.amazon.com	www.mapquest.com
www.americangreetings.com	www.marketwatch.com
www.aol.com	www.mcafee.com
www.apple.com	www.microsoft.com
www.ask.com	www.mindspring.com
www.barnesandnoble.com	www.monster.com
www.bluemountain.com	www.msn.com
www.bonzi.com	www.msnbc.com
www.broadcast.com	www.mtv.com
www.cdnow.com	www.netscape.com
www.classmates.com	www.nfl.com
www.cnet.com	www.nytimes.com
www.cnn.com	www.onhealth.com
www.compuserve.com	www.passport.com
www.digitalcity.com	www.pathfinder.com
www.dogpile.com	www.pch.com
www.ebay.com	www.previewtravel.com
www.egreetings.com	www.priceline.com
www.eonline.com	www.quicken.com
www.etrade.com	www.real.com
www.excite.com	www.realtor.com
www.expedia.com	www.shockwave.com
www.freelotto.com	www.simplenet.com
www.geocities.com	www.snap.com
www.go.com	www.sony.com
www.goto.com	www.sportsline.com
www.homestead.com	www.superpages.com
www.hotmail.com	www.switchboard.com
www.hp.com	www.talkcity.com
www.icq.com	www.ticketmaster.com
www.ign.com	www.travelocity.com
www.infospace.com	www.treeloot.com
www.intuit.com	www.tripod.com
www.ivillage.com	www.uproar.com
www.iwon.com	www.usatoday.com
www.jcpenney.com	www.weather.com

PRIVACY ONLINE:

www.webcrawler.com

www.webshots.com

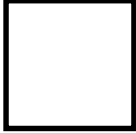
www.women.com

www.wwf.com

www.xoom.com

www.yahoo.com

www.zdnet.com



Federal Trade Commission
2000 Online Privacy Survey

ID # _____

Surf Survey Form

Surfer's Name _____ Date _____

Assigned Domain (URL) [Most Popular Group Results] _____

PART 1 - SCREENING

Instructions:

- (1) Are you unable to access this URL?

IF YES, STOP HERE and **RECORD** a “U” in the box at upper left.
Then **GO** to your next assigned URL.

- (2) Is the domain an “*adult site*?”

IF YES, STOP HERE and **RECORD** an “A” in the box at upper left.
Then **GO** to your next assigned URL.

- (3) Is the domain *directed to children under 13*?

IF YES, STOP HERE and **RECORD** “K” in the box at upper left.
Then **GO** to your next assigned URL.

If you answered NO to (1) through (3), WRITE the domain's ID Number on a folder. **PRINT** the home page, **WRITE** the domain's ID Number on it, and **PLACE** it in the folder.

Then you're ready to **GO** to **Survey Question 1**.

PART 2 - DOMAIN ATTRIBUTES

Instructions: Circle **NO** or **YES** for each question below unless instructed to skip the question. **NO YES**

Q1 Is a **PRIVACY SEAL** posted on this domain? **50 41**

Examples:

TRUSTe PriceWaterhouseCoopers *BetterWeb*
CPA WebTrust ESRB *Privacy Online Certified*
BBBOnline Privacy

Other (write in): _____
(Consult a proctor before relying upon "other" to answer YES to this question.)

Q2 Is a **PRIVACY POLICY** posted on this domain? **3 88**

If **NO**, **SKIP** to **Question #4**.

If **YES**, **PRINT** the entire Privacy Policy, **WRITE** the domain's ID Number on it, and **PLACE** it in the folder. If you cannot print the Privacy Policy, **ASK** a proctor for assistance. If the Privacy Policy cannot be printed, **COPY** it in its entirety in **Part 3** of this form (be sure to **RECORD** the URL(s) where the Privacy Policy appears). Then **GO** to **Question #3**.

Q3 Is there a **LINK** to the Privacy Policy on this domain's home page? **5 83**

Examples: icon or highlighted text

Q4 Is one or more **INFORMATION PRACTICE STATEMENT(S) (IPS)** posted on this domain? **9 82**

If **NO**, **GO** to **Question #5**.

If **YES**, **PRINT ALL** Information Practice Statements, **WRITE** the domain's ID Number on each page you print, **HIGHLIGHT** the Information Practice Statement, and **PLACE** the page in the folder. If you cannot print an Information Practice Statement, **ASK** a proctor for assistance. If the Information Practice Statement cannot be printed, **COPY** it in its entirety in **Part 3** of this form (be sure to **RECORD** the URL where the Information Practice Statement(s) appears). Then **GO** to **Question #5**.

Instructions: Circle **NO** or **YES** for each question below unless instructed to skip the question. **NO YES**

Q5 Does the domain collect **EMAIL ADDRESSES**? **1 90**

Q6 Does the domain collect **PERSONAL IDENTIFYING INFORMATION other than email address**? **4 87**

Examples:

Name	Fax Number
Postal Address	Credit Card Number
Telephone Number	Social Security Number

Other (write in): _____
(Consult a proctor before relying upon “other” to answer YES to this question.)

Q7 Does the domain collect **NON-IDENTIFYING INFORMATION**? **21 70**

Examples:

Age/Date of Birth	Occupation
Gender	Interests or hobbies
Education	Type of hardware/software using
ZIP Code, but not an address	Income

Other (write in): _____
(Consult a proctor before relying upon “other” to answer YES to this question.)

STOP

Go to your next assigned URL.

PART 3 - NOTES

Instructions: Use this space to record any privacy policy or information practice statement that cannot be printed.

URL _____

Federal Trade Commission
2000 Online Privacy Survey

ID # _____

Third-Party Cookie Survey Form

Surfer's Name _____	Date _____
Assigned Domain (URL) [Most Popular Group Results] _____	



Instructions: Circle NO or YES.

NO YES

Q8 Is a **THIRD PARTY** (i.e., any domain **OTHER THAN** the domain you are currently visiting) attempting to place a cookie at this domain?

20 71

IF YES, record the URL of the third party attempting to place the cookie:

STOP

Go to your next assigned URL.

Federal Trade Commission
2000 Online Privacy Survey

ID # _____

Content Analysis Form

Content Analyst's Name _____	Date _____
Content Analyst's Name _____	
Assigned Domain (URL) [Most Popular Group Results] _____	

Instructions: Circle NO or YES for each question below unless otherwise instructed.

PART 1 - NOTICE

	NO	YES
Q9 Does the Privacy Policy/Information Practice Statement contain a declaration that the domain does NOT collect any personal information from consumers?	91	0

[If the Privacy Policy/Information Practice Statement contains such a declaration, answer YES.
If it does not contain such a declaration, answer NO.]

If NO, GO to Question #10.
If YES, SKIP to Question #24.

Q10 Does the Privacy Policy/Information Practice Statement say anything about what specific personal information the domain collects from consumers?	9	82
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PART 2 - INTERNAL USE: NOTICE AND CHOICE

Q11	Does the Privacy Policy/ Information Practice Statement say anything about how the domain may use personal information it collects for internal purposes?	NO	YES
		0	91

If NO, SKIP to Question #15.
If YES, GO to Question #12.

Q12	Does the Privacy Policy/Information Practice Statement say anything about whether the domain uses personal information it collects to send communications to the consumer?	2	89
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If NO, SKIP to Question #15.
If YES, GO to Question #13.

Q13 Choose **ONE** of the following options and **CIRCLE the number corresponding to your choice.**

The Privacy Policy/Information Practice Statement . . . **CIRCLE ONE**

says that the **domain does or may** use personal information to **send communications to the consumer (other than those directly related to processing an order or responding to a consumer’s question).** **87**

says that the **domain does not** use personal information to **send communications to the consumer (other than those directly related to processing an order or responding to a consumer’s question).** **2**

IF YOU CHOSE #1 to this question, **GO** to **Question #14.**
IF YOU CHOSE #2 to this question, **SKIP** to **Question #15.**

Q14 Choose **ONE** of the following options and **CIRCLE the number corresponding to your choice.**

The Privacy Policy/Information Practice Statement . . . **CIRCLE ONE**

says that the **domain** provides consumers an opportunity to **opt in** to receiving future communications from the domain (other than those directly related to processing an order or responding to a consumer’s question). **12**

says that the **domain** provides consumers an opportunity to **opt out** of receiving future communications from the domain (other than those directly related to processing an order or responding to a consumer’s question). **58**

says that the **domain** requires **consent or offers a choice** with respect to receiving future communications from the domain (other than those directly related to processing an order or responding to a consumer’s question), but **does not make clear** whether the choice is opt-in or opt-out. **8**

does not say anything about offering consumers **choice** with respect to receiving future communications from the **domain** (other than those directly related to processing an order or responding to a consumer’s question). **9**

PART 3 - DISCLOSURES TO THIRD PARTIES: NOTICE AND CHOICE

	NO	YES
Q15 Does the Privacy Policy/Information Practice Statement say anything about whether the domain discloses personal information it collects to third parties?	2	89

If NO, SKIP to Question #18.
If YES, GO to Question #16.

Q16 Choose **ONE** of the following options and **CIRCLE the number corresponding to your choice.** **CIRCLE ONE**

The Privacy Policy/Information Practice Statement . . .

says that the domain **does or may** disclose **personal identifying information** to **third parties.** **73**

says that the domain **does NOT disclose personal identifying information** to **third parties, or does so only:**

- (a) as required by law,
- (b) as necessary to process an order, and/or
- (c) in aggregate or non-identifying form. **16**

IF YOU CHOSE #1 to this question, **GO to Question #17.**
IF YOU CHOSE #2 to this question, **SKIP to Question #18.**

Q17 Choose **ONE** of the following options and **CIRCLE the number corresponding to your choice.**

The Privacy Policy/Information Practice Statement . . . **CIRCLE ONE**

says that the domain provides consumers an opportunity to **opt in** to the disclosure of **personal identifying information** to third parties. **8**

says that the domain provides consumers an opportunity to **opt out** of the disclosure of **personal identifying information** to third parties. **26**

says that the domain requires **consent or offers a choice** with respect to the disclosure of **personal identifying information** to third parties, but **does not make clear** whether the choice is opt-in or opt-out. **20**

does not say anything about offering consumers **choice** with respect to disclosure of **personal identifying information** to third parties. **19**

PART 4 - ACCESS

		NO	YES
Q18	Does the Privacy Policy/Information Practice Statement say that the domain allows consumers to review at least some personal information about them?	48	43
Q19	Does the Privacy Policy/Information Practice Statement say that the domain allows consumers to have inaccuracies corrected in at least some personal information about them?	21	70
Q20	Does the Privacy Policy/Information Practice Statement say that it allows consumers to have at least some personal information about them deleted from the domain's records?	63	28

PART 5 - SECURITY

Q21	Does the Privacy Policy/Information Practice Statement say that the domain takes any steps to provide security ?	24	67
	<p>If NO, SKIP to Question #24.</p> <p>If YES, GO to Question #22.</p>		
Q22	Does the Privacy Policy/Information Practice Statement say that the domain takes steps to provide security , for personal information the domain collects, during transmission of the information from the consumer to the domain?	18	49
	Example: Secure Socket Layer Technology or SSL		
Q23	Does the Privacy Policy/Information Practice Statement say that the domain takes steps to provide security , for personal information the domain has collected, after the domain has received the information (i.e., not during transmission, but after collection)?	24	43

PART 6 - COOKIES

Q24 Does the Privacy Policy/Information Practice Statement say **anything about whether the DOMAIN places cookies?** **NO YES**
12 79

If NO, SKIP to Question #26.
If YES, GO to Question #25.

Q25 Choose **ONE** of the following options and **CIRCLE the number corresponding to your choice.**

The Privacy Policy/Information Practice Statement . . . **CIRCLE ONE**
says that the domain **does or may** place cookies. **79**
says that the domain **does not** place cookies. **0**

Q26 Does the Privacy Policy/Information Practice Statement say **anything about whether THIRD PARTIES may place cookies** and/or collect personal information on the domain? **NO YES**
53 38

If NO, STOP!
Review your answers for accuracy and to ensure that all questions were **answered or skipped appropriately.**
Then, **Go to your next folder.**

If YES, GO to Question #27.

Q27 Choose **ONE** of the following options and **CIRCLE the number** **cor-**
responding to your choice. **CIRCLE ONE**
The Privacy Policy/Information Practice Statement . . .
says that third parties **do or may** place cookies and/or collect personal information on the domain. **38**
says that third parties **do not** place cookies and/or collect personal information on the domain. **0**

STOP!

Review your answers for **accuracy** and to ensure that all questions were **answered or skipped appropriately**.
Then, **Go to your next folder**.

2000 Online Privacy Survey Instructions for Surf Survey Form

GENERAL INSTRUCTIONS

1. Your role in the survey is to determine whether your assigned domains collect personal information from online consumers and post disclosures about the collection and use of this information. We refer to these disclosures as “Privacy Policies” or “Information Practice Statements.” The following step-by-step instructions provide guidance on these terms.
2. In this survey, we use the term “**personal identifying information**” to refer to information that can be used to identify or locate an individual. We use the term “**non-identifying information**” to refer to information that, taken alone, cannot be used to identify or locate an individual. We use the more general “**personal information**” to include **EITHER “personal identifying information” AND/OR “non-identifying information.”** The step-by-step instructions provide further guidance on these terms.
3. Surf each domain for a maximum of **20 minutes**, looking for a privacy seal, Privacy Policy, Information Practice Statements, and places where personal information is collected (see step-by step instructions for more details). **Be sure to stay within the assigned domain as you move from Web page to Web page.**
4. If you have any questions, or if you are uncertain at any point as to what you should do, consult a proctor.

STEP-BY-STEP INSTRUCTIONS

Start with the first assigned domain (URL) on your list. Enter the domain's ID Number (shown on your list of assigned URLs), URL, your name and the date on page 1.

PART I SCREENING

This part of the form requires you to answer a series of screening questions to determine whether the domain should be included in the survey. Where possible, answer these questions by looking at the home page. If the home page does not provide enough information, skim the domain. If you determine that a domain should be excluded from the survey, indicate the reason for your decision by entering the appropriate letter in the box on page 1.

(1) Are you unable to access this URL?

Exclude a domain from the survey if you are unable to access it because you receive a message that the domain is “**Under Construction,**” “**Inactive,**” or “**Unavailable,**” or because you receive a “**404 error**” or “**No DNS Entry**” message. Record a “**U**” in the box at the upper left on page 1 and to go your next assigned URL.

If you are able to access the domain, answer screening question (2).

Note: If, when typing in an assigned URL, you are automatically referred to another URL, apply the following screening criteria to the new URL.

(2) Is the domain an “*adult site*?”

Determine whether, in your judgment, the domain's content and graphics are pornographic in nature. If the domain is an *adult site*, **exclude** it from the survey. Record an “**A**” in the box at upper left on page 1 and go to your next assigned URL. If the domain is not an *adult site*, answer screening question (3).

(3) Is the domain *directed to children under the age of 13*?

Consider the following factors (taken from the Children's Online Privacy Protection Rule, 16 CFR § 312.2): the domain's subject matter, visual or audio content, age of models, language or other characteristics; whether advertising appearing on the domain is directed to children; and whether the domain uses animated characters and/or child-oriented activities and incentives. Use these factors to form a judgment as to whether the domain is *directed (or targeted) to children under the age of 13*. If the domain is *directed to children under the age of 13*, **exclude** it from the survey. Record a “**K**” in the box at upper left of page 1 and go to your next assigned URL.

If, after answering all three screening questions, you have not excluded the domain from the survey, print the home page, write the domain's ID number on it, and place it in a folder. Write the domain's ID Number on the folder tab. You are now ready to answer the survey questions in PART 2.

PART 2 DOMAIN ATTRIBUTES

This part of the form requires you to answer questions about the domain's content. Proceed through the form from beginning to end, in the order directed by the instructions on the form. **Do not answer questions out of order, unless instructed to skip a question.** Circle NO or YES for each question, unless instructed to skip the question.

PLACES TO LOOK FOR PRIVACY SEALS, PRIVACY POLICIES, INFORMATION PRACTICE STATEMENTS, AND COLLECTION OF PERSONAL INFORMATION

Try to view every screen on the domain. If the domain is extremely large, look for screens where personal information collection is likely to occur or where privacy disclosures are likely to be posted. Here are some ideas:

registration form	order form	survey form
terms of service	terms of use	guest book / "About You"
FAQs	contest registration	Help
account page	"feedback"	legal page
membership page	"subscribe here"	"shop here"

If the domain has a search tool, type terms such as "privacy," "security," "mailing list," or "order form."

PRIVACY DISCLOSURES

Question 1 Is a PRIVACY SEAL posted on this domain?

Several privacy assurance programs have been developed that license privacy seals to online companies whose information practices meet program standards. This question asks whether such a privacy seal is posted on the domain. Typically, these seals appear on the home page or with a domain's Privacy Policy, but you should not stop there if you find no seal. Continue to search the domain until you are satisfied that a privacy seal either is or is not posted.

Color reproductions of each of the privacy assurance program seals listed as examples in this question accompany this training manual. If you find a seal or icon that is not listed as an example but appears to be a privacy seal, consult a proctor before Circling "YES" and writing the name of the seal on the line provided.

Question 2 Is a PRIVACY POLICY posted on this domain?

Increasingly, online companies are posting descriptions of their information practices. In this survey, we refer to these descriptions as “Privacy Policies.” A Privacy Policy may, for example, describe what an online company does with any personal information it collects from online consumers, as well as any options it provides online consumers regarding how it will use this information. It may also describe the steps the domain takes to provide security for personal information it collects, or procedures available to online consumers to see what information has been collected about them. Companies don’t always use the term “Privacy Policy,” so look for terms such as “Privacy Statement,” “Privacy,” “Security,” “Online Privacy Practices,” or “Our Policies.”

If you find a Privacy Policy, print it, write the domain’s ID Number on the printout, and place it in the domain’s folder. Check to be sure that you have printed the entire Privacy Policy. **If the domain has both a Privacy Policy and a Security Policy, be sure to print them both.** If, after trying the printing tips listed below, you cannot print the Privacy Policy, copy it verbatim in Part 3 of the survey form.

Note: If a Privacy Seal is posted on the domain, clicking on it may take you to the seal program’s standards rather than the domain’s Privacy Policy. **Be sure you find and print the domain’s Privacy Policy.**

Note: As a rule, clicking on the “Print” button will print an entire Privacy Policy as a single document. Occasionally, however, sections of a Privacy Policy are configured as separate documents and must be printed separately (there may be hypertext for each section). **Please check** after printing a Privacy Policy to be sure everything you intended to print has in fact been printed. Consult a proctor if you are unsure about this. Write the domain’s ID Number on every document you print.

Question 3 Is there a link to the Privacy Policy on this domain’s home page?

Search the home page for an icon or highlighted text that allows a domain visitor to click to the Privacy Policy. Be sure to scroll all the way down to the bottom of the home page. Look for highlighted terms such as “Privacy Policy,” “Privacy Statement,” “Privacy,” “Security,” “Online Privacy Practices,” or “Our Policies.”

Note: It is possible that the page that appears when you type in an assigned URL will bear only the domain’s logo. If this occurs, click on the logo. The Web page that appears after the logo is the “home page,” for purposes of this question; answer this question, therefore, based upon whether an icon or highlighted text appears on this page.

Question 4 Is one or more INFORMATION PRACTICE STATEMENT(S) posted on this domain?

Often online companies post disclosures about particular information practices in various locations on a domain where they are most relevant, for example, on order forms or registration pages. We refer to such individual disclosures as “Information Practice Statements.” This is our term; it is unlikely that you will see the phrase “Information Practice Statement” on domains. **A list of sample Information Practice Statements accompanies these instructions. These are the types of disclosures that you are looking for.** If you are uncertain as to whether a disclosure is an Information Practice Statement, consult a proctor.

Because it is valuable to consumers to read Information Practice Statements in relevant contexts, we want to capture them wherever they appear on the domain. Thus, this question asks you to search the domain for Information Practice Statements **even if you have found a Privacy Policy.** You must make an effort to find all Information Practice Statements posted on the domain.

If you find an Information Practice Statement, print the page(s) on which it appears and highlight it. Write the domain’s ID Number on each page you print, and place the page(s) in the domain’s folder (please check to be sure everything you intended to print has printed). If, after trying the printing tips listed below, you cannot print the Information Practice Statement, copy it verbatim in Part 3 of the survey form.

Note: You are looking for all Information Practice Statements on the domain, not just one. You are likely to find Information Practice Statements in places on the domain that you will search to answer Questions 5-7 (i.e., places where personal information is collected). Therefore, don’t spend an excessive amount of time trying to locate all Information Practice Statements before proceeding to Questions 5-7.

PERSONAL INFORMATION COLLECTION

Questions 5-7 ask you to determine whether the domain collects certain categories of personal information from online consumers. By “collecting information,” we mean providing online consumers an opportunity to give the domain **any** personal information, whether or not the domain requires such information. To answer Questions 5-7, **follow the suggestions in the box on p. 3** for guidance as to where personal information collect may occur.

Note: If you have found either a Privacy Policy or an Information Practice Statement(s), **do not** rely upon it to answer these questions. **You must search the domain** to determine for yourself what, if any, personal information is being collected, regardless of what the Privacy Policy or Information Practice Statement might say about collection of personal information.

Question 5 Does the domain collect EMAIL ADDRESSES?

For purposes of this question, all opportunities for providing the domain an online consumer's email address, including the online forms listed in the box on page 3, sending email to the online company, or contacting the domain's Webmaster, are considered collection of an email address.

Question 6 Does the domain collect PERSONAL IDENTIFYING INFORMATION other than an email address?

As noted above, we define "personal identifying information" as information that can be used to identify or locate an individual. An email address is one type of personal identifying information. Other examples include name, postal address, telephone number, fax number, credit card number, and Social Security number. This question asks you to determine whether the site is collecting **at least one** type of personal identifying information other than an email address. If, for example, a domain collects online consumers' names, Circle YES and move on to Question 7.

If you find that a domain is collecting a type of personal identifying information that is not listed as an example, consult a proctor before Circling "YES" and writing the type of information on the line provided.

Question 7 Does the domain collect NON-IDENTIFYING INFORMATION?

As noted above, we define "non-identifying information" as information that, taken alone, cannot be used to identify or locate an individual. Examples include age/date of birth, gender, education, occupation, interests or hobbies, type of hardware or software in use, and a ZIP Code without an address. This question asks you to determine whether the site is collecting **at least one** type of non-identifying information. If, for example, a domain collects information about consumers' hobbies, Circle YES.

If you find that a domain is collecting a type of non-identifying information that is not listed as an example, consult a proctor before Circling "YES" and writing the type of information on the line provided.

When you have answered Question 7, go to your next assigned URL.

PRINTING TIPS

- (1) Wait for the Web page to finish loading (“Document Done” on lower tool bar), click on the “Stop” button, then print.
- (2) If you cannot print the entire screen, but the text you want to print appears in a “frame,” print the frame by clicking on it and then clicking on “File” and “Print Frame.”
- (3) If you experience difficulty, highlight the text you want to print and type Ctrl-C (or use the “Copy” button) to copy the text to the clipboard. Then go into WordPerfect 8 and type Ctrl-V (or use the “Paste” button) to drop the text into a WordPerfect document. Then print. Be sure to write the URL of the page where the text appears, and the domain’s ID Number, on the page.
- (4) If you continue to experience difficulty, save the Web page, then open the saved file and print it (some graphics may be lost in this procedure) (see a proctor for details).

**2000 Online Privacy Survey
Instructions for Third-Party Cookie Survey Form**

1. Delete all cookie files in your computer's cookie cache.
2. Be sure that your browser preferences are set to warn you before accepting a cookie.
3. Write your name and the date in the spaces provided.
4. Write the assigned domain's URL, and the assigned domain's ID Number, in the spaces provided (see folder tab or list of assigned URLs for ID Numbers).
5. Enter the assigned domain's URL in your browser.
6. Check for the domain shown in the first cookie alert that appears. If the domain shown in the cookie alert is **NOT** the assigned domain, **CIRCLE YES** for Question 8 **and RECORD** the URL of the domain shown in the cookie alert in the space provided. **THEN GO** to your next assigned domain.
7. If the domain shown in the cookie alert is the assigned domain, choose "cancel" to reject the cookie and continue observing for any other cookie alerts. **RECORD** the URL of the first domain **other than the assigned domain** to appear in a cookie alert and **CIRCLE YES** for Question 8. If no other alerts appear, or if the assigned domain is the only domain to appear in a cookie alert, **CIRCLE NO** for Question 8 and go to your next assigned domain.
8. Remember to reject all cookies by clicking on "Cancel" in the alert box.
9. In some cases, it may be necessary to search beyond the home page in order to ascertain whether a third party is attempting to place a cookie. **Be certain to stay within the assigned domain.** In any case, spend no more than five minutes checking for cookie alerts on the assigned domain (URL).

2000 Online Privacy Survey Instructions for Content Analysis Form

GENERAL INSTRUCTIONS

1. Your role in the survey is to answer questions about the content of the privacy disclosures of your assigned domains. You should answer the questions in the Content Analysis Form based on a careful reading of all the privacy disclosures in your folder.
2. You should rely only on the privacy disclosures in your folder. Do not look at or rely upon the pink Survey Form in your folder to complete the Content Analysis Form. Note: When a privacy disclosure could not print, the disclosure will be written on the back of the pink Survey Form.
3. Complete the Content Analysis Form in order, and carefully follow directions regarding when to skip certain questions. Please do not skip around the Form.
4. You must work independently. Do not discuss your answers with or seek help from anybody except as explained under point #5, below.
5. Every domain's privacy disclosures will be reviewed by two content analysts you and your partner. As a team, you will be given a set of 10 folders (each containing one domain's privacy disclosures) to analyze at one time. Divide these folders between the two of you i.e., five folders each. After you have each completed analyzing 5 folders, you will remove the white Content Analysis Forms you completed and swap the folders. You will then each independently analyze the 5 folders your partner analyzed first. Once you have each analyzed all ten folders, you and your partner will meet to reconcile your answers. For each folder you reviewed, you must compare your answers to each question on the Content Analysis Form. Where your answers disagree, you must discuss the question and arrive at a single answer. Then, record your reconciled answers for all questions (including those questions that you agreed upon) on the green Content Analysis Form, sign the form, and proceed to reconcile the next folder.

DEFINITION OF KEY TERMS

1. **“Privacy Disclosure:”** Privacy disclosures refer to any statement on a domain regarding that domain’s information practices i.e., what information they collect, what they do with it, and how they treat it. Privacy disclosures include both “privacy policies” and “information practice statements.” A privacy policy is a detailed or unified description of a domain’s information practices. Often, online companies also post disclosures about particular information practices in various locations on a domain where they are most relevant, for example, on order forms or registration pages. We refer to such discrete disclosures as information practice statements, although they are not titled as such. They are simply privacy disclosures that appear outside a privacy policy. The information practice statements that the surfer found should be highlighted. Your answers on the Content Analysis Form should be based on all of the privacy disclosures found in the domain’s folder, read together.
2. **“Personal identifying information:”** We use the term “personal identifying information” to refer to information that can be used to identify or locate an individual. Examples: email address, name, address, phone number, fax number, credit card number, Social Security number.
3. **“Non-identifying information:”** We use the term “non-identifying information” to refer to information that, taken alone, cannot be used to identify or locate an individual. Examples: Age/date of birth, gender, occupation, education, ZIP code with no address, interests, hobbies, types of hardware/software using, income.
Note: Non-identifying information refers to the type of information, regardless of whether such information is collected along with, or is linked to, personal identifying information.
4. **“Personal information:”** We use this term to refer to **EITHER “personal identifying information” AND/OR “non-identifying information.”**
Note: Domains use different terms to describe personal information. You must read a domain’s privacy disclosures carefully to understand what information a statement is referring to. You should not necessarily equate the term “personal information” as it appears in a privacy disclosure with the term as it is used in these instructions or on the Content Analysis Form.
5. **“Third party:”** Any entity other than the assigned domain. Examples: advertisers, affiliates, subsidiaries, business partners, or other companies.

STEP-BY-STEP INSTRUCTIONS

PART 1 - NOTICE

Questions 9 - 10 deal with disclosures about the collection of personal information from consumers.

Question 9 *Does the Privacy Policy/ Information Practice Statement contain a declaration that the domain does **NOT** collect any personal information from consumers?*

Answer YES: If you find an express statement that the domain does **NOT** collect any personal information from consumers.

Example: We do not collect any information about you when you visit our site.

Answer NO: If you do not find a statement that the domain does **NOT** collect any personal information from consumers, or if you find at least one statement that the domain **DOES** collect at least one type of personal information.

Examples: We collect your ZIP code when you provide it to get the weather forecast for your area.

We don't collect any information from you other than the information you provide to us when you register for this site.

Note: Remember, "personal information" refers to either personal identifying information or non-identifying information. Thus, if a domain says it "collects only non-identifying information" the answer to this question is NO.

Question 10 *Does the Privacy Policy/ Information Practice Statement say **anything about what specific personal information the domain collects from consumers?***

Answer YES: If you find at least one statement about what specific personal information the domain collects or does not collect from consumers.

Examples: We collect your name and address when you register for this site.

We collect only demographic information, such as your gender, age, and ZIP code.

Answer NO: If you do not find a statement about what specific personal information the domain collects from consumers, or if the statement does not specify what personal information the domain collects from consumers.

Example: We collect information about you when you visit our site.

PART 2 INTERNAL USE: NOTICE AND CHOICE

Questions 11 - 14 deal with disclosures about how the domain may use personal information it collects from consumers for internal purposes.

“Internal purposes” include, but are not limited to, processing orders or requests for information, improving a site’s performance, keeping track of which pages on a site are visited, and sending consumers future communications (such as emails, newsletters, updates, and marketing or promotional material).

Note: Internal purposes do not include the disclosure of information to third parties, for any purpose.

Question 11 *Does the Privacy Policy/ Information Practice Statement say **anything about how the domain may use personal information it collects for internal purposes?***

Answer YES: If you find at least one statement about how the domain may use personal information it collects for internal purposes. Such a statement can describe how the information will be used for internal purposes, how the information will not be used for internal purposes, or offer consumers choice with respect to the use of the information for internal purposes.

Examples: We never use your personal information for any purpose.

We use your personal information to improve your experience on our site.

We only use your email address to send you a message confirming that your order was processed and to tell you the date your product will be shipped.

We only use your information to process your order.

We use your email address to send you newsletters that may be of interest to you.

Send us an email to get on our email updates list.

Click here if you do not want to receive emails from us in the future.

Put me on your mailing list [click-box checked]

We never send you email about our products and services without your consent.

When you send a question to “Ask the Doctor,” you must provide us an email address. We use this address to answer your question.

Answer NO: If you do not find a statement about how the domain may use personal information it collects for internal purposes, i.e., the privacy disclosures are silent with respect to how the domain may use personal information it collects for internal purposes.

Note: Questions 12, 13 and 14 are a group. All three deal with one particular use of personal information for internal purposes — namely, the use of personal information by the domain to send communications to the consumer. Question 12 asks if there is any statement (positive or negative) about this type of use. If there is such a statement, Question 13 asks what the statement says, i.e., whether the domain says that it does or does not use personal information to send communications to the consumer (other than those directly related to processing an order or responding to a consumer’s question). If the domain says that it does use personal information in this way, Question 14 asks whether the domain says that it provides consumers with any choice with respect to this use of personal information.

Question 12 *Does the Privacy Policy/ Information Practice Statement say **anything about whether the domain uses personal information it collects to send communications to the consumer?***

Note: The term “communications to the consumer” includes, but is not limited to, putting the consumer on a mailing list, or sending the consumer marketing or promotional messages, newsletters, or updates. It also includes sending the consumer information about his/her order.

Answer YES: If you find at least one statement that personal information may be or is used by the domain to send communications to the consumer. These communications may be sent via email, regular postal mail, or telephone. A statement offering a consumer choice about receiving future communications is also considered such a statement. You should also answer YES to this question if you find a statement that personal

information is not or is never used by the domain to send communications to the consumer. You should also answer YES to this question if you find a statement whose clear implication is that the information will or will not be used to send communications to the consumer.

Examples: We never use your personal information for any purpose.

We only use your email address to send you a message confirming that your order was processed and to tell you the date your product will be shipped.

We only use your information to process your order.

We use your email address to send you newsletters that may be of interest to you.

Send us an email to get on our email updates list.

Click here if you do not want to receive emails from us in the future.

Put me on your mailing list [click-box checked]

We never send you email about our products and services without your consent.

When you send a question to “Ask the Doctor,” you must provide us an email address. We use this address to answer your question.

Answer NO: If you do not find a statement about whether the domain uses personal information it collects to send communications to the consumer, i.e., the privacy disclosures are silent with respect to whether the domain uses personal information it collects to send communications to the consumer.

Example: We use your personal information to improve your experience on our site.

Question 13 This question requires you to characterize what the domain says regarding the use of personal information to send communications to the consumer.

Circle 1 (“does or may”): If you find a statement that the domain **does or may** use personal information to send communications to the consumer (**other than those directly related to processing an order or responding to a consumer’s question**).

Examples: We use your email address to send you newsletters that may be of interest to you.

Send us an email to get on our email updates list.

Click here if you do not want to receive emails from us in the future.

Put me on your mailing list [click-box checked]

We never send you email about our products and services without your consent.

Circle 2 (“does not”): If you find a statement that the domain **does not** use personal information to send communications to the consumer (**other than those directly related to processing an order or responding to a consumer’s question**).

Example: We never use your personal information for any purpose.

We only use your email address to send you a message confirming that your order was processed and to tell you the date your product will be shipped.

We only use your information to process your order.

When you send a question to “Ask the Doctor,” you must provide us an email address. We use this address to answer your question.

Question 14 This question requires you to characterize whether or not the domain offers consumers a choice regarding the use of their personal information to send communications to the consumer (other than those directly related to processing an order or responding to a consumer’s question), and, if so, to determine the nature of that choice.

Note: We ask about two types of choice - “opt-in” and “opt-out”:

- “Opt-in” choice requires an affirmative act by the consumer (such as checking a click-box or sending an email or a letter) before the information can be used in a particular manner; i.e., the default is that the information will not be used.
- “Opt-out” choice allows the consumer to take an action (such as checking a click-box or sending an email or a letter) to prevent the information from being used in a particular manner; i.e., the default is that, absent action by the

consumer, the information will be used.

Note: If the domain provides choice with respect to sending **at least some** communications to the consumer (other than those directly related to processing an order or responding to a consumer’s question), then answer Question 14 based on that choice. Thus, for example, if the domain provides consumers choice with respect to being on the domain’s mailing list, but does not state that it provides choice with respect to other communications it may send, answer Question 14 based on the choice provided with respect to mailing lists.

Circle 1 (“opt in”): If the domain requires an affirmative act by the consumer before it will use personal information to send communications to the consumer (other than those directly related to processing an order or responding to a consumer’s question). The personal information is not used until the consumer takes some required action. Thus, if the consumer does not want his or her personal information used in this way, he or she does not have to do anything.

Examples: Send us an email to get on our email updates list.

 Click here to be included in our mailing list.

 If you would like to receive email updates with information about sales and discounts, fill out this form.

Circle 2 (“opt out”): If the domain will use personal information to send communications to the consumer (other than those directly related to processing an order or responding to a consumer’s question), unless the consumer takes some required action to stop this use of personal information. Thus, if the consumer does not want his or her personal information used in this way, he or she must take some required action.

Examples: Click here if you do not want to receive emails from us in the future.

 Put me on your mailing list [click-box checked]

 If you do not want to receive email updates with information about sales and discounts, please send an email to the following address.

Circle 3 (“consent or choice, but unclear what type”): If the domain states that it requires the consumer’s consent before sending, or that it offers a choice with respect to receiving, communications from the domain (other than those directly related to processing an order or responding to a consumer’s question), but does not make clear whether the choice is opt-in or opt-out.

Examples: We never send you email about our products and services without your consent.

We will not include you in our mailing list without first obtaining your permission.

Circle 4 (“no choice”): If, after reviewing all of the privacy disclosures in your folder, you can find no statement about whether the domain offers consumers choice with respect to receiving communications from the domain (other than those directly related to processing an order or responding to a consumer’s question), i.e., the privacy disclosures are silent with respect to this issue.

Examples: We use your email address to send you newsletters that may be of interest to you.

PART 3 DISCLOSURES TO THIRD PARTIES: NOTICE AND CHOICE

Questions 15 - 17 deal with statements about whether the domain discloses personal information it collects to third parties.

Note: Questions 15, 16, and 17 are a group. All three deal with statements about the domain’s disclosure of personal information to third parties. Question 15 asks if there is any statement (positive or negative) about this type of disclosure. If there is such a statement, Question 16 asks what the statement says, i.e., whether the domain says that it does or does not disclose personal information to third parties. If the domain says that it does or may disclose personal information to third parties, Question 17 asks about whether the domain says that it provides consumers with any choice with respect to this disclosure of personal information.

Note: Domains often use verbs other than “disclose.” Look for statements about “sharing,” “renting,” “selling,” “providing” or “giving” information to third parties.

Note: Remember, “third parties” include any entity other than the domain, such as advertisers, affiliates, business partners, or other companies.

Question 15 *Does the Privacy Policy/ Information Practice Statement say **anything about whether the domain discloses personal information it collects to third parties?***

Answer YES: If you find at least one statement that personal information may be or is disclosed by the domain to third parties. You should also answer YES to this question

if you find a statement that personal information is not or is never disclosed by the domain to third parties.

Examples: We never share your name and address with any third party.

We may share information about our visitors with our advertisers, but we will only share such information in the aggregate. We will never disclose your identity to any third party.

We may disclose your information to third parties, but only to complete delivery of your order.

We occasionally disclose our mailing list to our affiliates so that they can send you information about special offers that may interest you.

If you want to receive special offers from our business partners, send us an email.

If you do not want us to share your personal information with any other parties, click here.

I'd like to receive special offers from your business partners [click-box checked]

We will never disclose your personal information without your consent.

Answer NO: If you do not find a statement about whether the domain discloses personal information it collects to third parties, i.e., the privacy disclosures are silent with respect to whether the domain discloses personal information it collects to third parties.

Example: We will use your personal information to process your order and serve you better.

Question 16 This question requires you to characterize what the domain says regarding the disclosure of personal identifying information to third parties.

Note: This question refers to personal identifying information. You must read the privacy disclosures carefully to see whether the domain does or may disclose such information, as opposed to non-identifying information. If the domain speaks generally about disclosure of personal information — without distinguishing between identifying or non-identifying informa-

tion — YOU SHOULD TREAT THE STATEMENT AS REFERRING TO PERSONAL IDENTIFYING INFORMATION.

Circle 1 (“does or may”): If you find a statement that the domain does or may disclose personal identifying information to third parties.

Examples: We occasionally disclose our mailing list to our affiliates so that they can send you information about special offers that may interest you.

If you want to receive special offers from our business partners, send us an email.

If you do not want us to share your personal information with any other parties, click here.

I'd like to receive special offers from your business partners [click-box checked]

We will never disclose your personal information without your consent.

Circle 2 (“does not”): If you find a statement that the domain does NOT disclose personal information to third parties, or does so only: (a) as required by law, (b) as necessary to process an order, and/or (c) in aggregate or non-identifying form.

Examples: We never share your name and address with any third party.

We may share information about our visitors with our advertisers, but we will only share such information in the aggregate. We will never disclose your identity to any third party.

We may disclose your information to third parties, but only to complete delivery of your order.

We only disclose personal information if required to do so by law.

We do not sell or rent your information.

Question 17 This question requires you to characterize whether or not the domain offers consumers a choice regarding the disclosure of their personal information to third parties.

Note: We ask about two types of choice — “opt-in” and “opt-out.” Please review the notes on this issue accompanying Question 14.

Note: If the domain provides choice with respect to the disclosure of **at least some** personal identifying information to **at least some** third parties, answer Question 17 based on that choice. Thus, for example, if the domain says that it provides consumers choice with respect to the disclosure of personal identifying information to advertisers, but does not say that it provides choice with respect to the disclosure of personal identifying information to other third parties, answer the question based on the choice provided with respect to advertisers.

Circle 1 (“Opt in”): If the domain requires an affirmative act by the consumer before it will disclose personal identifying information to third parties. The personal identifying information is not disclosed until the consumer takes some required action. Thus, if the consumer does not want his or her personal identifying information disclosed to third parties, he or she does not have to do anything.

Examples: If you want to receive special offers from our business partners, send us an email.

To give your permission for us to disclose your name and address to third parties, click here.

Circle 2 (“Opt out”): If the domain will disclose personal identifying information to third parties, unless the consumer takes some required action to stop this disclosure. Thus, if the consumer does not want his or her personal identifying information disclosed to third parties, he or she must take some required action.

Examples: If you do not want us to share your personal information with any other parties, click here.

I'd like to receive special offers from your business partners [checkbox checked]

Please send us an email if you do not wish for us to disclose your name and address to third parties.

If you do not want to receive mailings from our business partners, click here.

Circle 3 (“consent or choice, but unclear what type”): If a domain states that it requires the consumer’s consent to, or that it offers a choice with respect to, the disclosure of personal identifying information to third parties, but does not make clear whether

the choice is opt-in or opt-out.

Examples: We will never disclose your personal information without your consent.

We only disclose your personal information to our trusted business partners with your permission.

Circle 4 (“no choice”): If, after reviewing all of the privacy disclosures in your folder, you can find no statement about whether the domain offers consumers choice with respect to disclosures of personal identifying information to third parties, i.e., the privacy disclosures are silent with respect to this issue.

Examples: We occasionally disclose our mailing list to our affiliates so that they can send you information about special offers that may interest you.

PART 4 ACCESS

Questions 18 - 20 deal with statements about a consumer’s ability to review, correct, or delete at least some personal information about them.

Question 18 *Does the Privacy Policy/ Information Practice Statement say that the domain allows consumers to review at least some personal information about them?*

Answer YES: If you find a statement that the domain allows consumers to review at least some personal information about them.

Example: To see the account information we have about you, click on “My Account.”

Answer NO: If you do not find a statement that the domain allows consumers to review at least some personal information about them (i.e., the privacy disclosures are silent on this issue), or if you find a statement that the domain does not allow consumers to review at least some personal information about them.

Note: To answer YES to this question, you must find a statement that the domain allows consumers to see or review at least some of the personal information about them. **Do not infer** the ability to review based upon your answers to Questions 19 or 20.

Question 19 *Does the Privacy Policy/ Information Practice Statement say that the domain allows consumers to **have inaccuracies corrected in at least some personal information** about them?*

Note: Privacy disclosures may use terms such as “edit” or “update” rather than “correct.”

Answer YES: If you find a statement that the domain allows consumers to have inaccuracies corrected in at least some personal information about them.

Examples: To correct your account information, select the “Edit” feature under “My Account.”

If you’ve moved, send us an email with your new address and we will update your information.

Answer NO: If you do not find a statement that the domain allows consumers to have inaccuracies corrected in at least some personal information about them (i.e., the privacy disclosures are silent on this issue), or if you find a statement that the domain does not allow consumers to have inaccuracies corrected in at least some personal information about them.

Question 20 *Does the Privacy Policy/ Information Practice Statement say that it allows consumers to **have at least some personal information about them deleted from the domain’s records**?*

Answer YES: If you find a statement that the domain allows consumers to have at least some personal information about them deleted.

Examples: You may also delete information.

To have your name and address deleted from our database, send us an email.

Answer NO: If you do not find a statement that the domain allows consumers to have at least some personal information about them deleted (i.e., the privacy disclosures are silent on this issue), or if you find a statement that the domain does not allow consumers to have at least some personal information about them deleted.

PART 5 SECURITY

Questions 21 - 23 deal with the steps the domain takes to provide security for personal information the domain collects.

Note: In answering these questions, be especially careful to check all the print-outs in your folder; sometimes information about security is included in its own section, often called “Security” or “About Security.”

Note: These questions ask about the steps taken by domains to provide security. Statements about a domain’s efforts to provide security are sufficient, even if the domain does not guarantee security. Thus, terms such as “best efforts,” “attempt,” “make an effort,” “strive” and “try” — when used to describe a domain’s security efforts — all qualify as statements regarding steps taken by domains with respect to providing security.

Question 21 *Does the Privacy Policy/ Information Practice Statement say that the domain takes any steps to provide security?*

Answer YES: If you find any statement that the domain takes steps to provide security, regardless of whether the statement relates to security during transmission of information, after the domain has received the information, or just security in general.

Examples: We take steps to ensure the security of your information.

We provide security for all information we collect.

This is a secure site.

We strive to ensure the security of your information. However, we cannot guarantee such security.

We use SSL to protect your credit card information.

We encrypt your information when you send it to us.

We store all our customer information on a secure server.

We use firewalls to prevent unauthorized access to our databases and servers.

Answer NO: If you do not find a statement that the domain takes steps to provide security (i.e., the privacy disclosures are silent on this issue), or if you find a statement that the domain does not take any steps to provide security.

Question 22 *Does the Privacy Policy/ Information Practice Statement say that the domain takes steps to provide **security**, for personal information the domain collects, **during transmission** of the information from the consumer to the domain?*

Note: Secured Socket Layer or “SSL” refers to security during transmission.

Answer YES: If you find a statement that the domain takes steps to provide security during transmission of the information from the consumer to the domain.

Examples: We use SSL to protect your credit card information.

We encrypt your information when you send it to us.

Answer NO: If you do not find a statement that the domain takes steps to provide security during transmission of the information (i.e., the privacy disclosures are silent on this issue), or if you find a statement that the domain does not take steps to provide security during transmission.

Note: General statements about security, which do not relate to transmission specifically, result in a “No” answer to this question.

Examples: We take steps to ensure the security of your information.

We provide security for all information we collect.

This is a secure site.

We strive to ensure the security of your information. However, we cannot guarantee such security.

We store all our customer information on a secure server.

We use firewalls to prevent unauthorized access to our databases and servers.

Question 23 *Does the Privacy Policy/ Information Practice Statement say that the domain takes steps to provide **security**, for personal information the domain has collected, **after the domain has received the information** (i.e., not during transmission, but after collection)?*

Answer YES: If you find a statement that the domain takes steps to provide security for personal information after the domain has received the information.

Examples: We store all our customer information on a secure server.

We use firewalls to prevent unauthorized access to our databases and servers.

Answer NO: If you do not find a statement that the domain takes steps to provide security for personal information after the domain has received the information (i.e., the privacy disclosures are silent on this issue), or if you find a statement that the domain does not take steps to provide security for personal information after the domain has received the information.

Note: General statements about security, which do not specifically relate to security after the domain has received the information, result in a “No” answer to this question.

Examples: We take steps to ensure the security of your information.

We provide security for all information we collect.

This is a secure site.

We strive to ensure the security of your information. However, we cannot guarantee such security.

We use SSL to protect your credit card information.

We encrypt your information when you send it to us.

PART 6 COOKIES

Questions 24 - 27 deal with “cookies.”

Question 24 *Does the Privacy Policy/ Information Practice Statement say **anything about whether the DOMAIN places cookies?***

Answer YES: If you find a statement that the domain places cookies. Also answer YES if you find a statement that the domain does not place cookies.

Examples: We use cookies on this site.

We also collect certain information through cookies.

We do not use “cookies.”

Answer NO: If you do not find a statement about whether the domain places cookies, i.e., the privacy disclosures are silent on this issue.

Question 25 This question requires you to characterize what the domain says about its use of cookies.

Circle 1 (“does or may”): If the domain says that the domain **does or may** place cookies.

Examples: We use cookies on this site.

We also collect certain information through cookies.

We might in the future use cookies.

Circle 2 (“does not”): If the domain says that the domain **does not** place cookies.

Example: We do not use “cookies.”

Question 26 *Does the Privacy Policy/ Information Practice Statement say **anything about whether THIRD PARTIES may place cookies and/or collect personal information on the domain?***

Answer YES: If you find a statement that third parties may place cookies and/or collect personal information on the domain. Also answer YES if you find a statement that third parties do not place cookies and/or collect personal information on the domain.

Examples: Advertisers whose ads appear on our site may use cookies.

We cannot control the use of cookies by advertisers or partners on our site.

We do not allow third parties to place cookies or collect personal information on our site.

Answer NO: If you do not find a statement about whether third parties may place cookies and/or collect personal information on the domain, i.e., the privacy disclosures are silent on this issue.

Question 27 This question requires you to characterize what the domain says about third parties' use of cookies on the domain.

Circle 1 (“do or may”): If the domain says that third parties **do or may** place cookies and/or collect personal information on the domain.

Examples: Advertisers whose ads appear on our site may use cookies.

We cannot control the use of cookies by advertisers or partners on our site.

Circle 2 (“do not”): If the domain says that third parties **do not** place cookies and/or collect personal information on the domain.

Example: We do not allow third parties to place cookies or collect personal information on our site.