

SAMPLE PRIVACY POLICY ANALYSIS

Policy Date	16-Nov-01	At very bottom of page, outside privacy text window, there is another date statement: "Last updated: May 20, 2002" which appears to refer to the privacy statement and/or terms of use; not sure which date applies
Date downloaded for analysis	05-Jun-02	URL: www.PharmaCo.com/print/privacy.asp

Overall Privacy Compliance Score	100
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TABLE 1: Compliance with Notice

Policy States	Compliance (Y/N)	Comments	Points
Who is collecting information	Y	Includes toll-free number and email address (privacy officer) for contacts; no mailing address within policy.	4
What information is collected	Y		4
When and how information is collected	Y		4
How the information will be used and disclosed	Y		4
Whether or not visitors will be profiled ("cookie" policy)	Y	May use persistent (not identified as such) cookies to "personalize our Web sites and to track your usage across other web sites" and may use third-party cookies as well. Requires third parties to agree to privacy policy. May profile users: "...we may associate your registration information with cookies..."	4
Compliance	FULL		

TABLE 6: Other Best Practice Parameters

Best Practice Parameter	Comments and Notes on Policy	
Change in Policy or practices notice	"As our privacy policies change in significant ways, we will make every effort to notify you of the changes. ... When the privacy policies change in a way that significantly affects the way we handle personal information, we will not use the information we have previously gathered without obtaining your consent. We will post privacy policy changes on our Web sites in a timely manner."	
Policy applies only online?	Yes	Policy states: "This Privacy Policy only applies to PharmaCo's Web sites."
Easy to find?	No	Small font, bottom of screen- need to scroll down; TRUSTe seal is prominent at bottom
Provides glossary or definitions of terms?	Yes	Provides link to separate glossary document; This may not be the best practice as users may not click to see the definition.
Uses Web bugs?	Maybe	Policy states: "In addition, we may use other tracking systems. (For information, see Web Bugs and Log Files.)"
COPPA statement?	Yes	Policy states: "We do not collect personally identifiable information from any person we actually know is a child under the age of 13."
TRUSTe seal?	Yes	
Other trustmarks cited?	HON	"Click to Verify" does NOT display Hon page verifying compliance; must use search function; initial review - 16 Nov 2001
EU Safe Harbor compliance statement?	No	
Other remarks		