



# Privacy Policy Assessment Form

## Developing a Privacy Policy for a Website or Blog

**Instructions:** Before inputting any answers, read all 20 questions and simply place a check mark (click on the box in the column marked ☒) next to the questions that apply to the website or blog being assessed. Then, go back and fill-in answers for each applicable line item. The answer cells will expand if necessary. Upon completion, this document can be used as an outline for your online privacy policy.

	Questions	☒	Answers
1	<b>What PII is collected?</b> – Specifically, what PII (personally-identifiable information) is collected? <i>For examples of PII, see <a href="#">What is PII.</a></i>		
2	<b>Sensitive PII</b> - If <i>sensitive</i> PII is collected is it done with affirmative consent? (opt-in) <i>Sensitive PII is personally-identifiable information which, if compromised, can cause a significant negative impact for the individual (i.e. financial &amp; medical records, religious affiliation). Credit card information, bank accounts, and social security numbers are examples.</i>		
3	<b>How is PII collected?</b> – What is the method for collecting PII? <i>For example: newsletter form, contact/webmail form, subscription form, registration form, service application form, shopping cart transaction form?</i>		
4	<b>Volume</b> - What is the volume of PII collected? <i>For example, one particular bill pending in Congress only applies if PII of more than 5,000 individuals is collected during any consecutive 12-month period.</i>		
5	<b>Purpose</b> - Is there a clear, valid purpose for the collection of each element of PII? <i>Per pending federal legislation, collectors of PII should only collect as much information as necessary to process or enforce a transaction or deliver a service, but allow for the collection and use of information for research and development to improve the transaction or service.</i>		
6	<b>Minors</b> - Is PII collected from children under the age of 13? <i>Is the product, service, or site-content targeted at children 12 and under? If so, <a href="#">COPPA</a> applies if PII is collected.</i>		

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	Questions	<input checked="" type="checkbox"/>	Answers
7	<p><b>Storage</b> - Is the PII stored in a secure fashion? How and where is it stored?  <i>Is it stored in a password-protected database on a secure server? Or on a password-protected and physically secure hard drive? Stored in encrypted format rather than clear text? Employee access on a need-to-know basis only?</i></p>		
8	<p><b>Transmission</b> - How is the PII transmitted?  <i>If transmitted across public networks and wireless networks, is the data encrypted?</i></p>		
9	<p><b>Usage</b> - How is the PII used?  <i>For example, is it used only for the stated purpose of the end-user form filled out by the consumer or is it also used for other purposes such as internal ad campaigns.</i></p>		
10	<p><b>Sharing</b> - Is the PII shared? If yes:  a) How, why, with whom?  b) Are third parties bound by contract to comply with the collector's privacy policy?  <i>For example, is the PII sold or otherwise shared with third parties, i.e. external advertisers?</i>  <i>Per pending federal legislation, the burden of protecting PII lies with the collector. See section 302 of Senate bill <a href="#">S 799</a> and MA state law.</i></p>		
11	<p><b>Opt-out</b> - Is there an opt-out function and is it clearly available?  <i>This refers to the website functionality not a browser (IE, Firefox, Chrome, etc.) feature.</i></p>		
12	<p><b>Access</b> - Can individuals access their PII and correct it or request that it no longer be used and distributed?  <i>If it cannot be directly accessed and edited by the PII owner, can the owner request deletion via email, postal mail, or phone, for example? Per pending Senate bill <a href="#">S 799</a> section 202.</i></p>		
13	<p><b>Retention</b> - How long is the PII retained?  <i>Pending federal legislation states that collectors of PII should retain it only for reasonable periods of time.</i></p>		

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14	<b>Disposal</b> - How is the PII disposed of? <i>Pending federal legislation specifies acceptable methods. For examples, see House bill <a href="#">HR 1707</a>, section 2.a.2: E &amp; F.</i>		
15	<b>Accuracy</b> - Are procedures in place to ensure the data is accurate? <i>Pending federal legislation requires this in certain instances. See bill <a href="#">S 799</a>, section 303 (a) and (b).</i>		
16	<b>Tracking</b> - Is analytics software embedded in the website or blog? <i>Google Analytics, for example, requires users to have a privacy policy that discloses the use of a cookie that collects anonymous web traffic data. See <a href="#">Google Analytics Terms of Service</a>, section 7.</i>		
17	<b>Ad networks</b> - Is an online advertising network utilized? <i>For example, <a href="#">Google's AdWords</a> network and <a href="#">Microsoft's Advertising</a> service require certain information in a site's privacy policy if using their services.</i>		
18	<b>Monetization</b> - Are monetization methods used such as ad serving networks or affiliate programs? <i>For example, <a href="#">Google's AdSense</a> service requires certain information in a site's privacy policy.</i>		
19	<b>Breach policy</b> - Has a breach policy plan been formulated? <i>For example, in the event of a security breach in which PII is acquired by an unauthorized party, is there a procedure for notifying owners of the PII?</i>		
20	<b>Dissolution</b> - If the relationship with PII owners changes due to a website sale, company sale, or bankruptcy, is there a plan for disposition of PII and is the plan disclosed in the current privacy policy. <i>Consistent with the intent of item #10, above, if assets are acquired by another entity, PII owners should be given advance notice and an opportunity to opt-out and have their PII rendered non-personally identifiable. Likewise, bankruptcy/dissolution plan should be disclosed relative to stored PII.</i>		

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