

# Long Summaries of Social Networking Service Privacy Policies

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## About the CATSMI Project

The Canadian Access to Social Media Information (CATSMI) Project operates out of the University of Victoria. It is a distinctly Canadian research project, but we believe that our findings have a very wide relevance. The central hypothesis of this project is that the evolution of a more “social web” poses significant challenges to theories of informational privacy as well as to the national legal systems and regulatory policies that have been based on these theories.

The main objective of the Project is to determine how the expectations of social networking websites and environments, whose *raison d'être* is the facilitation of the sharing of personal information about and by users, can be reconciled with prevailing understandings about “reasonable expectations of privacy” and the existing regimes that are designed to protect personal data. Organizations have to make decisions about the granularity and range of privacy choices to offer users. Are there significant variances between organizations’ perspectives and policies on access to personal information by data subjects on the one hand, and those of government authorities on the other? Are data subjects meaningfully made aware of their own rights to access data, and the capabilities of authorities to access the same subjects’ data?

The Project has adopted a three-track process to understand the relationship between social networking services and government intelligence and policing services. **First**, we have analyzed the stated policies and publicly available lawful access documents that social networking services have prepared. These documents were accessed via public Internet repositories or, in one case, through private sources. This has revealed how personal information is made available by social networking services, and the conditions for providing it to government agencies.

**Second**, researchers investigated whether members of social networking services could access their own records and correct misleading or incorrect fields, and thus enforce their privacy rights under the Personal Information Protection and Electronic Documents Act (PIPEDA), and substantially similar provincial legislation. This approach allows us to ascertain the actual access that Canadians might have to the profiles that they, and networking services they are associated with, are developing. It also let us ascertain whether records provided to service members contain similar, more, or less information than the data fields that may be made available to law enforcement.

**Third**, Project members have evaluated how existing disclosure policies are, or would be, affected by forthcoming Canadian lawful access legislation. This final level of analysis will clarify whether Canadian authorities will have new powers in excess of social networking companies’ existing disclosure conditions.

The outcome of our analysis is a better understanding of how Canadians’ information is collected and made available to social network members and third-parties. By analyzing the practices of major social networking sites we have sought to make it clear to Canadians how their personal information might be accessed by authorities.



CATSMI’s research is funded through the Office of the Privacy Commissioner of Canada’s Contributions program. The use of these funds is independent of the Commissioner; as such, information in this document reflects work that emerges from independent academic research and does not necessarily reflect the Privacy Commissioner’s own position(s). Funding has also come from a Social Sciences and Human Research Council (SSHRC) grant: “Social Networking and Privacy Protection: The Conflicts, the Politics, the Technologies (2010-13).

## Overview of Long Summaries of Social Networking Service Privacy Policies

Social networking companies such as Facebook, Twitter, Meetup, and Club Penguin use privacy policies to inform subscribers about how their personal information is treated. As part of the Canadian Access to Social Media Information (CATSMI) Project, which has been funded through the Office of the Privacy Commissioner of Canada's Contributions Program, we have analyzed these documents to compare how different companies make their privacy policies available, and differentially protect and disclose subscribers' personal information.

In what follows we compare social networking companies' privacy policies using a common set of questions. In this document we comprehensively capture what we learned from reading these companies' privacy policies in June-July 2012; information here has been summarized in a shorter format in our "Short Summaries of Social Networking Service Privacy Policies" document, which is available at the CATSMI Project's website.

Following each question we analyze core aspects of these companies' policies, focusing on:

- ease of access for users, and reference to relevant privacy laws and legal jurisdictions;
- information about how companies define, collect, use, and disclose personally identifiable information;
- information concerning network security; and
- general policies surrounding user access, deletion, and opportunities for correcting their personal data.

Methodologically, we focused on the companies that provide the social network (e.g. Twitter), rather than the companies who provide applications to communicate with social networks (e.g. Tweetdeck, a desktop client that lets individuals post to, and read from, the Twitter social networking service). Thus, we have analyzed only these networking companies' privacy policies. Networks were chosen based on their relative popularity with Canadians; we ascertained popularity by reviewing recent marketing surveys of how, and what, social networks are used by residents of Canada.

All answers are current as of July 2012.

### Cite As

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## 1. THE POLICY

### a) Is there a link to a privacy policy on the homepage?

Social Network	Findings	Notes
Blogger (Google)	Yes	
Club Penguin	Yes	
Facebook	Yes	Indirectly links to full policy through an abridged version. Privacy policy entitled 'Data Use Policy.'
Flickr (Yahoo)	Yes	
Foursquare	Yes	
Google +	Yes	Indirectly links to privacy policy through a 'Policies & Principles' page.
Instagram	Yes	
LinkedIn	Yes	Indirectly links to full policy through an abridged version.
LiveJournal	Yes	
Meetup	Yes	
MySpace	Yes	Two links found on homepage.
Nexopia	Yes	
Ping (Apple)	Yes	
Pinterest	Yes	
Plenty of Fish	Yes*	Link entitled 'Terms' brings user to a page where they can find 'PLENTYOFFISH PRIVACY POLICY' after scrolling down past 'PLENTYOFFISH TERMS OF USE AGREEMENT.'
Reddit	Yes	
Tumblr	No*	Link entitled 'Terms' brings user to a 'Terms of Service' page that has a visible link to the Privacy Policy.
Twitter	Yes	
Wikimedia Foundation	Yes	
WordPress.com	Yes	
WordPress.org	Yes	
World of Warcraft	Yes	
YouTube (Google)	Yes	
Zynga	Yes	Indirectly links to full policy through an abridged version.

**b) Is the privacy policy distinctive to the service itself, or is the service and policy part of a larger whole/organization?**

Social Network	Findings
Blogger (Google)	Common to all services offered by Google and its affiliates.
Club Penguin	Unique to Social Network/ Subsidiary of ‘The Walt Disney Family of Companies.’
Facebook	Unique to Social Network.
Flickr (Yahoo)	Common to all Yahoo! products and services.
Foursquare	Unique to Social Network.
Google +	Common to all services offered by Google and its affiliates.
Instagram	Unique to Social Network.
LinkedIn	Unique to Social Network.
LiveJournal	Unique to Social Network.
Meetup	Unique to Social Network.
MySpace	Common to all Myspace Services.
Nexopia	Unique to Social Network.
Ping (Apple)	Common to all Apple products and services.
Pinterest	Unique to Social Network.
Plenty of Fish	Unique to Social Network.
Reddit	Unique to Social Network/ Subsidiary of Condé Nast Digital, a subsidiary of Advance Publications.
Tumblr	Unique to Social Network.
Twitter	Unique to Social Network.
Wikimedia Foundation	Common to all Wikimedia projects.
WordPress.com	Common to Automattic Inc.’s websites, which include: automatic.com, wordpress.com, gravatar.com, intensedebate.com, and akismet.com. The Privacy Policy is available under a Creative Commons Sharealike license, which means anyone is welcome to repurpose it for their own use.
WordPress.org	Unique to Social Network.
World of Warcraft	Common to all Blizzard Entertainment and affiliate companies’ websites.

Social Network	Findings
YouTube (Google)	Common to all services offered by Google and its affiliates.
Zynga	Unique to Zynga Inc. ‘social game services.’

**c) Is there reference to compliance with: National privacy laws, international guidelines, self-regulatory instruments from associations? Note which nations, privacy laws, guidelines, etc are recognized.**

Social Network	Findings	Notes
Blogger (Google)	Yes	US-EU Safe Harbor Framework, US-Swiss Safe Harbor Framework, UK Internet Advertising Bureau Good Practice Principles for Online Behavioural Advertising, the Australian Best Practice Guideline for Online Behavioural Advertising, and IAB Europe’s European Framework for Online Behavioural Advertising. Member of Network Advertising Initiative.
Club Penguin	Yes	The United States Children’s Online Privacy Protection Act, applicable European Union Data Protection legislation, Canadian federal and provincial privacy legislation, other applicable data privacy laws and all other applicable legislation.  All applicable privacy laws relating to the provision of financial services.  Safe Harbor Principles (when using/disclosing PII transferred from the EU, Switzerland, or Australia to the US).
Facebook	Yes	Complies with California law. Complies with the U.S.-E.U and U.S.-Swiss Safe Harbor frameworks.
Flickr (Yahoo)	No	
Foursquare	Yes	Complies with the ‘applicable laws’ of United States federal and state governments, law enforcement or regulatory agencies.
Google +	See: Blogger (Google)	
Instagram	No	
LinkedIn	Yes	Participates in the EU Safe Harbor Privacy Framework as administered by the United States Department of Commerce.  Self-certifies that privacy practices are consistent with U.S.-E.U. Safe Harbor principles.

Social Network	Findings	Notes
		Member of Council of American Survey Research Organizations (CASRO), and abides by CASRO guidelines for market research.
LiveJournal	Yes	Complies with the U.S. Department of Commerce’s Safe Harbor Program.  Complies with Council of Better Business Bureaus, Inc. EU Safe Harbor ‘independent dispute resolution mechanism.’
Meetup	No	
MySpace	Yes	Complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce.  Adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement.  Committed to the BBB EU Safe Harbor ‘dispute resolution mechanism,’ operated by the Council of Better Business Bureaus.
Nexopia	No	
Ping (Apple)	Yes	Abides by the “safe harbor” frameworks set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information collected by organizations in the European Economic Area and Switzerland.
Pinterest	No	Only mentions that “Pinterest cooperates with government and law enforcement officials.”
Plenty of Fish	No	References ‘Applicable Privacy Laws.’
Reddit	No	
Tumblr	Yes	California Civil Code sections 1798.83-1798.84 (California residents entitled to ask for a notice identifying the categories of personal customer information that is shared with affiliates and/or third parties).
Twitter	Yes	Complies with the U.S.-E.U. and U.S.-Swiss Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement.
Wikimedia Foundation	No	
WordPress.com	No	

Social Network	Findings	Notes
WordPress.org	No	
World of Warcraft	Yes	<p>Complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from EU member countries and Switzerland.</p> <p>Self-certifies that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement.</p> <p>California law (California residents may request certain information regarding disclosure of PI).</p>
YouTube (Google)	See: Blogger (Google)	
Zynga	Yes	<p>Complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set out by the US Department of Commerce regarding the collection, use, and retention of PI from EU member countries and Switzerland.</p> <p>Self-certifies that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement.</p> <p>References California Privacy Rights.</p>

**d) Is there a 'good housekeeping' seal of approval (e.g. TRUSTe)?**

Social Network	Findings	Notes
Blogger (Google)	No	
Club Penguin	Yes	TRUSTe Children's Online Privacy Seal Program.
Facebook	Yes	TRUSTe EU Safe Harbor
Flickr (Yahoo)	No	
Foursquare	No	
Google +	See: Blogger (Google)	
Instagram	No	
LinkedIn	Yes	TRUSTe's Privacy Seal
LiveJournal	No	
Meetup	No	
MySpace	No	
Nexopia	No	
Ping (Apple)	Yes	TRUSTe's Privacy Seal
Pinterest	No	
Plenty of Fish	No	
Reddit	No	
Tumblr	No	
Twitter	No	
Wikimedia Foundation	No	
WordPress.com	No	
WordPress.org	No	
World of Warcraft	Yes	TRUSTe's Privacy Seal
YouTube (Google)	See: Blogger (Google)	
Zynga	Yes	TRUSTe's Privacy Seal

**e) Is there a statement concerning which nation/court proceedings must go through?**

Social Network	Findings	Notes
Blogger (Google)	No*	Terms of Service states that all claims will be litigated exclusively in the federal or state courts of Santa Clara County, California, USA.
Club Penguin	No*	Terms of Service states that all claims shall be filled in courts located in the borough of Manhattan, City of New York, State of New York, United States of America.
Facebook	No*	Terms of Service states that all claims will be resolved in a state or federal court located in Santa Clara County, California.
Flickr (Yahoo)	No*	Terms of Service states that “You and Yahoo! agree to submit to the personal and exclusive jurisdiction of the courts located within the province of Ontario.”
Foursquare	No*	Terms of Service states that “parties consent to exclusive jurisdiction and venue in the United States Federal Courts or state courts located in the Southern District of New York.
Google +	See: Blogger (Google)	
Instagram	No	
LinkedIn	No*	Terms of Service states that: “You and LinkedIn agree to submit to the personal jurisdiction of the courts located within Santa Clara County, California... Notwithstanding the above, you agree that LinkedIn shall still be allowed to apply for injunctive remedies (or an equivalent type of urgent legal relief) in any jurisdiction.”
LiveJournal	No*	Terms of Service states that: “You and LiveJournal agree to submit to the personal and exclusive jurisdiction of the courts located within the county of San Francisco, California, U.S.A.”
Meetup	No*	Terms of Service states: “You and Meetup agree to submit to the personal and exclusive jurisdiction of the courts located within the State of New York.”

Social Network	Findings	Notes
MySpace	No*	Terms of Service states: “You and Myspace agree to submit to the exclusive jurisdiction of the courts located within the State of New York.”
Nexopia	No*	Terms of Service states: “You agree to submit to the exclusive jurisdiction of the courts of the Province of Alberta and the Federal Courts located within the Province of Alberta.”
Ping (Apple)	No*	Terms of Service states: “You agree to the personal jurisdiction by and venue in the state and federal courts in Santa Clara County, California.”
Pinterest	No*	Terms of Service states: “We each agree to submit to the personal jurisdiction of a state court located in Santa Clara County, California or the United States District Court for the Northern District of California.”
Plenty of Fish	No*	Terms of Service states: “As a condition of using the Services, each user agrees that any and all disputes and causes of action arising out of or connected with Plentyoffish, shall be resolved through arbitration, with such arbitration to be held in Vancouver, British Columbia, Canada.”
Reddit	No*	User agreement states that both parties agree to submit to the exclusive personal jurisdiction and venue of the state or federal courts in New York.
Tumblr	No*	Terms of Service states: “You agree to submit to the personal jurisdiction of the courts located within New York County, New York.”
Twitter	No*	Terms of Service states: “All claims... will be brought solely in the federal or state courts located in San Francisco County, California, United States.”
Wikimedia Foundation	No*	Terms of Service states: “If you seek to file a legal claim against us, you agree to file and resolve it exclusively in a state or federal court located in San Francisco County, California.”

Social Network	Findings	Notes
WordPress.com	No*	- Terms of Service states: "...any dispute arising under this Agreement shall be finally settled in accordance with the Comprehensive Arbitration Rules of the Judicial Arbitration and Mediation Service, Inc. ("JAMS") by three arbitrators appointed in accordance with such Rules. The arbitration shall take place in San Francisco, California, in the English language and the arbitral decision may be enforced in any court."
WordPress.org	No	
World of Warcraft	No*	EULA states: "If you are a resident of the United States, any arbitration will take place at any reasonable location convenient for you. For residents outside the United States, any arbitration shall be initiated in the County of Los Angeles, State of California, United States of America."
YouTube (Google)	See: Blogger (Google)	
Zynga	No*	Terms of Service states: "If you are a resident of the United States.... You agree to submit to the personal jurisdiction of the courts located within San Francisco County, California... If you reside outside of the United States... You agree to submit to the personal jurisdiction of the courts in Luxembourg."

**f) Is there reference in the privacy policy to the Terms of Service or EULA, and vice versa? Are the statements consistent?**

Social Network	Findings	Notes on Consistency
Blogger (Google)	Terms of Service references privacy policy.	Terms of Service states: “When you upload or otherwise submit content to our Services, you give Google (and those we work with) a worldwide license to use, host, store, reproduce, modify, create derivative works (such as those resulting from translations, adaptations or other changes we make so that your content works better with our Services), communicate, publish, publicly perform, publicly display and distribute such content.”
Club Penguin	Privacy policy references Terms of Service, and vice versa.	Terms of Service states: You hereby grant us.... a non-exclusive, irrevocable... worldwide license... to use, reproduce, transmit, display, exhibit, distribute, index, comment on, modify... for any and all purposes including, without limitation, entertainment, news, advertising, promotional, marketing, publicity, trade or commercial purposes, all without further notice to you, with or without attribution, and without the requirement of any permission from or payment to you or to any other person or entity.
Facebook	Terms of Service references privacy policy.	
Flickr (Yahoo)	Privacy policy references Terms of Service, and vice versa.	Terms of Service states: “With respect to Content... you submit or make available for inclusion on publicly accessible areas of the Service other than Yahoo! Groups, the perpetual, irrevocable and fully sublicensable license to use, distribute, reproduce, modify, adapt, publish, translate, publicly perform and publicly display such Content (in whole or in part) and to incorporate such Content into other works in any format or medium now known or later developed.” And also:

		“You irrevocably waive any moral rights or other rights with respect to attribution of authorship or integrity in the Content you submit.”
Foursquare	Privacy policy references Terms of Service, and vice versa.	
Google +	See: Blogger (Google)	
Instagram	No	
LinkedIn	Privacy policy references Terms of Service, and vice versa.	
LiveJournal	Privacy policy references Terms of Service, and vice versa.	
Meetup	Privacy policy references Terms of Service, and vice versa.	
MySpace	Terms of Service references privacy policy.	
Nexopia	Privacy policy references Terms of Service, and vice versa.	<p>Inconsistent statements about deleting personal information. (i.e. Privacy Policy suggests that info may remain, Terms of Service explicitly states that it will remain.)</p> <p>The Privacy Policy states that “due to technical constraints and the fact that Nexopia backs up its systems, Personal Information may continue to reside in Nexopia’s systems after deletion.”</p> <p>Terms of Service states that “you grant us a continuing perpetual license and right to maintain a copy of your Content for archival purposes.”</p>
Ping (Apple)	Terms of Service references privacy policy.	
Pinterest	Privacy policy references Terms of Service, and vice versa.	
Plenty of Fish	Privacy Policy references Terms of Service.	

Reddit	Privacy policy references Terms of Service, and vice versa.	
Tumblr	Privacy policy references Terms of Service, and vice versa.	
Twitter	Terms of Service references privacy policy.	
Wikimedia Foundation	Terms of Service references privacy policy.	
WordPress.com	Terms of Service references privacy policy.	
WordPress.org	Could not locate Terms of Service/EULA.	
World of Warcraft	No	
YouTube (Google)	See: Blogger (Google)	
Zynga	Privacy policy references Terms of Service, and vice versa.	

**g) Is privacy policy in anyway different after the user has registered for the site (e.g. is the policy different)?**

INFO N/A

**h) Is the information on privacy policy unified in one place, or dispersed?**

Social Network	Findings
Blogger (Google)	Unified on one page with links to additional relevant information.
Club Penguin	Unified on one page.
Facebook	Mostly unified on one page with links to additional relevant information. Privacy for minors is completely different page. (And there is no link to this page from privacy policy)
Flickr (Yahoo)	Dispersed. In addition to the official Yahoo! Privacy Policy, there is a separate Data Storage and Anonymization page, and a short Flickr specific privacy policy available at: <a href="http://info.yahoo.com/privacy/us/yahoo/flickr/details.html">http://info.yahoo.com/privacy/us/yahoo/flickr/details.html</a>
Foursquare	Unified on one page.
Google +	See: Blogger (Google)
Instagram	Unified on one page.
LinkedIn	Unified on one page with links to additional relevant information.
LiveJournal	Unified on one page.
Meetup	Unified on one page.
MySpace	Unified on one page.
Nexopia	Unified on one page.
Ping (Apple)	Unified on one page.
Pinterest	Unified on one page.
Plenty of Fish	Unified on one page.
Reddit	Unified on one page.
Tumblr	Unified on one page.
Twitter	Unified on one page with links to additional relevant information.
Wikimedia Foundation	Unified on one page.
WordPress.com	Unified on one page.
WordPress.org	Unified on one page.
World of Warcraft	Unified on one page with links to additional relevant information.
YouTube (Google)	See: Blogger (Google)

Social Network	Findings
Zynga	Unified on one page with links to additional relevant information.

**i) Is there information about when the privacy policy was last updated? Is it dated? Can one access previous versions?**

Social Network	Findings	Notes
Blogger (Google)	Last modified: March 1, 2012.	Archive of all previous versions of the policy is accessible. A comparison of changes between policies is also available for every time the policy was modified.
Club Penguin	Effective as of January 11, 2012.	No link to previous versions.
Facebook	Date of Last Revision: June 8, 2012.	No link to previous versions.
Flickr (Yahoo)	Effective Date: 23 April 2010.	No link to previous versions. Link to preexisting privacy policies of some of the Yahoo! acquired companies is accessible.
Foursquare	Last updated: January 12, 2011.	No link to previous versions.
Google +	See: Blogger (Google)	
Instagram	No date / No link to previous versions.	
LinkedIn	Last revised on June 16, 2011.	Link provided to a 'Summary of the Changes' made to the Privacy Policy.
LiveJournal	Effective Date: December 12, 2010.	No link to previous versions.
Meetup	Revision date: May 23, 2010.	No link to previous versions.
MySpace	Last Revised December 7, 2010.	No link to previous versions.
Nexopia	Last updated November 2, 2009.	No link to previous versions.
Ping (Apple)	Last updated: May 21, 2012.	No link to previous versions.
Pinterest	Last modified on March 23, 2012, and was first published and made effective February 2011.	Link provided to previous Privacy Policy.
Plenty of Fish	No*	Terms of Use Agreement states "Last Updated On November 2nd, 2011," which is on the same page as Privacy Policy.
Reddit	"Last Revised Aril 10, 2012 (updated contact info)" (sic)	No link to previous versions.

Social Network	Findings	Notes
Tumblr	Last Modified: 2012-03-22.	Link to prior versions of the policy provided. Versions are stored on GitHub, which allows you to compare different versions and see what has changed.
Twitter	Effective: May 17, 2012.	Link to archive of previous privacy policies provided.
Wikimedia Foundation	“This version of the Privacy policy was approved in October 2008 by the Board of Trustees.”	Link to ‘discussion archive’ of privacy policy changes is provided.
WordPress.com	Last modification: February 1, 2011.	- No link to previous versions, but log of changes dating back to 2009 is provided.
WordPress.org	No date / No link to previous versions.	
World of Warcraft	Last updated on March 25, 2011.	No link to previous versions.
YouTube (Google)	See: Blogger (Google)	
Zynga	Last updated on September 30, 2011.	No link to previous versions.

**j) Does the company reserve the right to change the privacy policy or other services that might involve the distribution of personal information without further notification? If notification is promised, under what conditions are users notified? What are terms of “accepting” the new policy?**

Social Network	Findings	Notes
Blogger (Google)	Prominent notice (including, for certain services, email notification) is promised if the changes are significant, and will occur before users become subject to new changes. All privacy policy changes will be posted on Google’s Privacy Policy page.	Google “will not reduce your rights under this [modified] Privacy Policy without your explicit consent.” Terms of Service states “If you do not agree to the modified terms for a Service, you should discontinue your use of that Service.”
Club Penguin	Reserves the right to change the privacy policy at their sole discretion. Users will be informed of any changes by email, a posting on the website, or a posting on the privacy policy page.	Club Penguin will not use PII in ways that are materially different from what is described in the privacy policy without providing notification and obtaining consent when required by applicable law.
Facebook	Notice of changes to Data Use Policy will be published on the page and on the Facebook Site Governance Page. Additional, prominent notice will be made if changes are material.	Unless changes are made for legal or administrative reasons, or to correct an inaccurate statement, Facebook will give users 7 days to provide them with comments on the change. If more than 7000 comments concerning a particular change are received, the change will be put up for vote. The vote will be binding on Facebook if more than 30% of all active registered users as of the date of the notice vote.
Flickr (Yahoo)	Yahoo! may update their privacy policy. Users will be notified about significant changes in the way they treat personal information by email or by a prominent notice on their site.	No conditions listed.
Foursquare	May amend the Privacy Policy from time to time. If material changes in the way they use PI occur, users will be notified by an announcement posting on their	“Use of information collected now is subject to the Privacy Policy in effect at the time such information is used.” “Users are bound by any changes to the Privacy Policy when they use the

Social Network	Findings	Notes
	Service or through email.	Service after such changes have been first posted.”
Google +	See: Blogger (Google)	
Instagram	May change Privacy Policy from time to time, and in Instagram’s sole discretion. No notification promised.	“Instagram encourages visitors to frequently check this page for any changes to its Privacy Policy. Your continues use of this site after any change in this Privacy Policy will constitute your acceptance of such change.”
LinkedIn	May update this Privacy Policy at any time, with or without advance notice. If there are significant changes in the way they treat PII, or in the Privacy Policy document itself, a notice will be displayed on the LinkedIn website or an email will be sent out.	For significant changes users will have the opportunity to review the changed terms prior to continuing to use the site.  If user objects to any of the changes and no longer wishes to use LinkedIn, they may close their account.  Using the LinkedIn Services after a notice of changes has been sent to you or published on their site shall constitute consent to the changed terms or practices.
LiveJournal	The Policy may be updated or amended at any time.	The revised policy will be posted on Privacy Policy page for users review.
Meetup	If Policy is changed, those changes will be posted on <a href="http://www.meetup.com/privacy">http://www.meetup.com/privacy</a> , on Meetup homepage, or other places deemed appropriate. If Meetup makes material changes, a prominent notice for members and others will occur, in some cases they will also email members.	If the changes affect how PII is treated, then the change will not apply to member without their affirmative consent. However, if after a period of 30 days they have not consented to the changes, their account will be automatically suspended until they choose to consent to the Policy changes.  Until such a consent, their PII will be treated under the Policy terms in force when they began their membership.  Any other changes to the policy will become effective after Meetup provides members with at least 30

Social Network	Findings	Notes
		<p>days notice of the changes. Members must notify Meetup within this 30 day period if they do not agree to the changes and wish to deactivate their account.</p>
MySpace	<p>May modify Privacy Policy from time to time. Such modifications will be effective upon posting on the Myspace Website.</p>	<p>Your continued use of the Myspace Services after Myspace posts a revised Privacy Policy signifies your acceptance of the revised Privacy Policy.</p> <p>If Myspace materially changes its practices regarding collection or use of PII, PII will continue to be governed by the Policy under which it was collected unless you have been provided notice and/or have not objected to the change.</p>
Nexopia	<p>If Privacy Policy is changed, Nexopia will post any changes on the site and “provide notification so that users will always be aware of what changes have been made to how information is collected, used and disclosed.”</p>	<p>Continued use of Nexopia shall constitute consent to the changes in the Privacy Policy.</p>
Ping (Apple)	<p>May update Privacy Policy from time to time.</p> <p>When Apple changes the policy in a material way a notice will be posted on their website along with the updated Privacy Policy.</p>	<p>No terms for accepting new policy specified.</p>
Pinterest	<p>May modify Policy from time to time in Pinterest’s sole discretion.</p> <p>Users will be notified of any changes to the Policy by the posting of the new Policy, and an update on the “last modified” data at the top of the Policy.</p>	<p>No terms for accepting new policy specified.</p>
Plenty of Fish	<p>No</p>	
Reddit	<p>May be modified from time to time; the date of the most recent revisions will appear on Privacy Policy page.</p>	<p>Continued access of the Website will constitute acceptance of any changes or revisions to the Privacy Policy.</p> <p>If you cannot agree with the terms and conditions of the Privacy Policy, do not use the Website.</p>

Social Network	Findings	Notes
Tumblr	May amend the policy from time to time, using the process for modifications set forth in Terms of Service (i.e. notice will be provided, generally via email when practicable, otherwise through the Services).	Use of the Services following any posted modification and notice of same constitutes acceptance of modifications.
Twitter	May revise the policy from time to time in their sole discretion. If the change is material, users will be notified via an @Twitter update or email.	By continuing to access or use the Services after those changes become effective, you agree to be bound by the revised Privacy Policy.
Wikimedia Foundation	No	
WordPress.com	Automattic may change its Privacy Policy from time to time, and in Automattic's sole discretion. Encourages visitors to frequently check Privacy Policy for any changes, and encourages users to check their blog's dashboard for alerts to these changes.	Continued use of the site after any change has been made will constitute acceptance of such change.
WordPress.org	May change Privacy Policy from time to time, and in their sole discretion. Encourages visitors to frequently check Privacy Policy page for any changes.	Continued use of the site after any change has been made will constitute acceptance of such change.
World of Warcraft	May change Privacy Policy from time to time. If Blizzard makes material changes, they will notify users by posting a notice on the website or in the Privacy Policy and, if necessary, give users additional choices regarding such change.	Continued use of the Blizzard website will signify acceptance of these changes.
YouTube (Google)	See: Blogger (Google)	
Zynga	If Zynga decides to make material changes to Privacy Policy they will notify users by placing a notice on Zynga.com or by sending a notice to the email address they have on file. They may supplement this process by placing notices in their games and on other Zynga websites.	No terms for accepting new policy specified.

## 2. PROCEDURES (FOR THE USER)

### a) Is there a contact to a privacy officer listed?

Social Network	Findings
Blogger (Google)	No. (“Contact us” link brings user to online ‘privacy troubleshooter’ form.)
Club Penguin	No. (A contact email and address are provided.)
Facebook	No. (Mailing address and online form is provided.)
Flickr (Yahoo)	Yes. (Privacy Officer can be contacted through feedback form or through mailing address provided.)
Foursquare	No. (Email address provided.)
Google +	See: Blogger (Google)
Instagram	No contact information listed.
LinkedIn	No. (Link to online ‘Help Center’ form and mailing address provided.)
LiveJournal	No. (Online form, email address, and mailing address provided.)
Meetup	No. (Postal address and email for ‘the Secretary of Meetup’ is provided.)
MySpace	No. (Online form through ‘help site’ and mailing address provided.)
Nexopia	Yes. (Privacy Officer can be contacted through email or mailing address provided.)
Ping (Apple)	No. (Online form provided.)
Pinterest	No. (Mailing address, phone number, and email address provided.)
Plenty of Fish	Yes. (Email address and name

Social Network	Findings
	of the Privacy Officer, Markus Frind, is provided.)
Reddit	Yes* (“Privacy Policy Coordinator’s” mailing address provided.)
Tumblr	No. (Mailing address for California residents provided.)
Twitter	No. (Email address and mailing address provided.)
Wikimedia Foundation	No. (General ‘contact us’ link is visible on page.)
WordPress.com	No. (General ‘contact us’ link is visible on page.)
WordPress.org	No. (General ‘contact us’ link is visible on page.)
World of Warcraft	Yes* (Privacy Policy Administrator’s email and mailing address provided.)
YouTube (Google)	See: Blogger (Google)
Zynga	No. (Email address and mailing address provided.)

**b) Is there an inquiry/complaints process specified? Are all steps outlined, or just initial complaint steps, or some variant? Do they have a time resolution period? Do you have to use their own contact process, or can you opt to use email/fax/telephone instead?**

Social Network	Findings	Notes
Blogger (Google)	Vague inquiry/complaints process.	When Google receives “formal written complaints, we will contact the person who made the complaint to follow up.”  Through the “Contact us” link, users can submit a message to Google through an online form.
Club Penguin	Vague inquiry/complaints process.	Option to email, write, or telephone through contact information provided.
Facebook	Vague inquiry/complaints process.	Asked to contact Facebook by mail or through online form.
Flickr (Yahoo)	Vague inquiry/complaints process.	Link to feedback form and mailing address are provided.
Foursquare	Vague inquiry/complaints process.	Asked to send a detailed message to email address provided
Google +	See: Blogger (Google)	
Instagram	No inquiry process information or contact information provided.	
LinkedIn	Vague inquiry/complaints process.	User asked to contact LinkedIn through online ‘Help Center’ form or mailing address provided.
LiveJournal	Inquiry/complaints process.	European Union citizens can contact LiveJournal through mailing address provided.  All users can submit a ‘customer support request’ or email LiveJournal when they have questions or issues with the policy. It may take LiveJournal a few days to respond.
Meetup	Vague inquiry/complaints process.	“Any dispute, claim or controversy arising out of or relating to this Policy or previous Privacy Policy statements shall be resolved through negotiation, mediation and arbitration as provided under our Terms of Service Agreement.”

Social Network	Findings	Notes
		Users can contact Meetup through mailing address or email provided.
MySpace	Inquiry/complaints process specified for EU citizens.	EU citizens encouraged to submit questions through online form or by mail.  Other users can contact MySpace through mailing address or online help form.
Nexopia	Vague inquiry/complaints process.	Users can contact Privacy Officer through mailing address or email provided.
Ping (Apple)	Vague inquiry/complaints process.	“If you have questions or complaints regarding our Privacy Policy or practices, please contact us.” [Link to online form provided.]
Pinterest	Vague inquiry/complaints process.	Mailing address, phone, and email provided.
Plenty of Fish	Inquiry/complaints process specified.	Questions/concerns are to be directed to Privacy Officer.  If user believes their copyrighted work has been infringed, detailed instructions about how to submit a complaint to a DMCA Agent at Plentyoffish is provided.
Reddit	Vague inquiry/complaints process.	Concerns or questions are to be directed to the Privacy Policy Coordinator via mailing address provided.
Tumblr	Extremely vague inquiry/complaints process.	“If you have any questions or concerns regarding privacy using the Services, please send us a detailed message.”  Mailing address is provided but is, apparently, only to be used by California residents.
Twitter	Vague inquiry/complaints process.	Email address and mailing address provided for those who have questions or comments.
Wikimedia Foundation	No	General ‘Questions for Wikimedia?’ Link is visible on page.
WordPress.com	No	Link to general ‘complaints page’ can be found after clicking on ‘contact us link.’
WordPress.org	No	
World of Warcraft	Vague inquiry/complaints process.	Users can file a complaint or direct questions to the email or mailing address provided.
YouTube (Google)	See: Blogger (Google)	
Zynga	Vague inquiry/complaints	Users can send an email or use mailing address

Social Network	Findings	Notes
	process.	provided.

**c) Is there a description/discussion of who you can complain to if you're unsatisfied with the information/processes given by the organization?**

Social Network	Findings
Blogger (Google)	No
Club Penguin	Option to contact TRUSTe if you believe Club Penguin has not satisfactorily responded to an inquiry.
Facebook	Option to contact TRUSTe in regard to Facebook's policies and practices.
Flickr (Yahoo)	No
Foursquare	No
Google +	See: Blogger (Google)
Instagram	No
LinkedIn	Option to contact TRUSTe through website link, fax, or mail address provided.
LiveJournal	Option to contact the "Council of Better Business Bureaus, Inc. BBB EU Safe Harbor" at mailing address, telephone number, or email address provided.
Meetup	No
MySpace	Link to the BBB EU Safe Harbor dispute resolution mechanism is provided.
Nexopia	No
Ping (Apple)	Option to contact TRUSTe through link provided.
Pinterest	No
Plenty of Fish	No
Reddit	No
Tumblr	No
Twitter	No
Wikimedia Foundation	No
WordPress.com	No

Social Network	Findings
WordPress.org	No
World of Warcraft	Option to contact TRUSTe through link provided.
YouTube (Google)	See: Blogger (Google)
Zynga	Option to contact TRUSTe through link provided or to submit a watchdog complain.

**d) Is there a statute of limitations for requesting access, that is, if you've deleted information previously does that prevent you from filing a request?**

Social Network	Finding	Notes
Blogger (Google)	N/A*	Privacy Policy states: "We may reject requests that... would be extremely impractical (for instance, requests concerning information residing on backup tapes)."
Club Penguin	Maybe	Privacy policy states that "the deletion of data may lead to a termination of the Club Penguin account and/or membership."
Facebook	N/A	
Flickr (Yahoo)	N/A	
Foursquare	N/A	
Google +	See: Blogger (Google)	
Instagram	N/A	
LinkedIn	Maybe	"If you close your account, we have no obligation to retain your information, and may delete any and all of your account information without liability."
LiveJournal	N/A	
Meetup	N/A	
MySpace	N/A	
Nexopia	N/A*	"Nexopia will not respond to repetitious or vexatious requests for access. In determining whether a request is repetitious or vexatious, it will consider such factors as the frequency with which information is updated, the purpose for which the information is used, and the nature of the information."
Ping (Apple)	N/A	
Pinterest	N/A	
Plenty of Fish	N/A	
Reddit	N/A	
Tumblr	N/A	
Twitter	N/A*	Must be a registered user to access or modify personal information through 'account settings.'
Wikimedia	N/A	

Social Network	Finding	Notes
Foundation		
WordPress.com	N/A	
WordPress.org	N/A	
World of Warcraft	Maybe*	“Please note that deletion of your data will lead to the termination of your account and applicable services.”
YouTube (Google)	See: Blogger (Google)	
Zynga	N/A	

**e) Is there an explicit process for opting out/in of disclosure of personal information? Does this include an authentication process?**

Social Network	Findings	Notes
Blogger (Google)	No	Under “Information you share” heading, Google states: “Our services provide you with different options on sharing and removing your content.” Under “Information we share” heading, Google states that Opt-in consent is required for the sharing of any sensitive personal information.
Club Penguin	Yes	Users can contact Club Penguin to request to have information deleted, or request that they no longer collect or maintain such information. Reasonable steps to help verify identity will be taken before granting access to personal information about parent or child.
Facebook	Yes*	Policy states: If you are uncomfortable sharing your real name, you can always delete your account... If you are uncomfortable making your profile and cover photos public, you can delete them... If you are uncomfortable making your network public, you can leave the network.
Flickr (Yahoo)	Yes	Users can edit their Yahoo! Account Information through link provided. (Must sign-in first.) Users & Non-Users can opt out of interest-matched advertising through link provided. Note: I don’t have a Yahoo! account, but when I clicked the link it informed me that my “Interest-based Ads” were turned on. It also displayed my IP Address, OS, Browser, Screen Resolution, & Color Depth information.
Foursquare	Yes	Users can change privacy settings through “Privacy Grid” page.
Google +	See: Blogger (Google)	
Instagram	Yes*	“Visitors can always refuse to supply personally-identifying information, with the caveat that it may prevent them from engaging in certain website-related activities.” “Visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Instagram, with the drawback that

Social Network	Findings	Notes
		certain features of Instagram’s websites may not function properly without the aid of cookies.”
LinkedIn	Yes	User can: review/edit personal information through ‘personal profile page,’ control what information is made available to search engines through ‘public profile,’ control whether profile information is shared with third parties, control whether LinkedIn uses your name and profile photo in social ads.
LiveJournal	Yes	User can opt out of network advertising cookies of NAI members. Link provided.
Meetup	No	Opt-in requirement. Meetup will not sell or share PII to third parties without affirmative consent.
MySpace	Yes	Link provided for user to opt of information collected by third party Internet advertising companies. Link provided for user to disable advertising customization for Non-Structured Profile Information.
Nexopia	Yes	User may change or remove any Profile Data by logging into account and clicking on the “Profile” and “Preferences” tabs, except for username, age, sex, and location. Suggests to check the Help menu of browser to configure browser to accept or reject cookies.
Ping (Apple)	No	
Pinterest	Yes	Instructions provided for changing cookies settings. Users can review, update, correct or delete the PI in their User account by contacting Pinterest or by editing their profile via the Service.
Plenty of Fish	No*	“You may notify us at any time that you wish to withdraw or change your consent to our use and disclosure of your information. We will accommodate your request subject to legal and contractual restrictions.”
Reddit	No	The Website generally collects PII with user’s specific knowledge and consent.
Tumblr	Yes	Instructions for turning off cookie feature on browser. Users given an explicit choice regarding information about contacts.  User will have a choice as to whether Tumblr collects and stores information related to mobile device, such as phone number.
Twitter	Yes	User must authorize third-party web clients or

Social Network	Findings	Notes
		<p>applications to access their Twitter account.</p> <p>User can delete imported address book contracts at any time through link provided.</p> <p>User can make information private through ‘settings’ link provided.</p>
Wikimedia Foundation	No	
WordPress.com	Yes*	“Visitors can always refuse to supply personally-identifying information, with the caveat that it may prevent them from engaging in certain website-related activities.”
WordPress.org	Yes*	“Visitors can always refuse to supply personally-identifying information, with the caveat that it may prevent them from engaging in certain website-related activities.”
World of Warcraft	Yes*	California Residents can opt out of having their PI shared with third parties by contacting “Blizzard Entertainment Privacy Policy, Attn: Opt-Out Administrator” at mailing address or email provided. All users “may be given the opportunity to “opt-out” of certain features or functionality.”
YouTube (Google)	See: Blogger (Google)	
Zynga	Yes	Zynga offers functionality that allows user to opt-out of public indexing of their public profile information. Users can opt in to receive information from a third party

**f) Is there a procedure for deleting information; a “right to forget”?**

Social Network	Findings	Notes
Blogger (Google)	Yes	<p>User can “Review and control certain types of information tied to Google Account by using Google Dashboard.”</p> <p>Google states, “...after you delete information from our services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems.”</p> <p>Link to Data Liberation Front through privacy policy. (The central location for information on how to move your data in and out of Google products.)</p>
Club Penguin	Yes	Users can request to have information deleted, but it may lead to a termination of the Club Penguin account and/or membership.
Facebook	Yes	<p>Typically information associated with your account will be kept until account is deleted.</p> <p>When you delete an account it is permanently deleted from Facebook. It typically takes about one month to delete an account, but some information may remain in backup copies and logs for up to 90 days.</p>
Flickr (Yahoo)	Yes	<p>Link to Account Deletion page provided.</p> <p>If you ask Yahoo! to delete your Yahoo! account, your account will, in most cases, be deactivated and then deleted from user registration database in approximately 90 days. Information copied in back-up storage may remain for some period of time.</p> <p>Flickr Pro accounts cannot be canceled.</p>
Foursquare	Yes	<p>“Delete account link” can be accessed on user’s account settings page.</p> <p>Such deletion may not be immediate, and residual copies of profile information or posts may remain on backup media for up to 90 days.</p> <p>Even after you’ve removed information from you account or profile, copies of that information may remain viewable elsewhere, to the extent it has been shared with others, distributed pursuant to privacy</p>

Social Network	Findings	Notes
		settings, or copies or stored by other users.
Google +	See: Blogger (Google)	
Instagram	No	
LinkedIn	Yes	<p>User can request deletion of their information at any time by contacting LinkedIn customer service. Requests will be responded to within 30 days.</p> <p>User can close account through the LinkedIn customer service site, which will remove user's name and other personally identifiable information from LinkedIn's publicly viewable database.</p> <p>LinkedIn may retain certain data contributed by user if LinkedIn believes it may be necessary to prevent fraud or future abuse, for legitimate business purposes, or if necessary to provide the Services to other Users.</p> <p>Other information user has shared with others, or that other users have copied, may also remain visible. LinkedIn disclaims any liability in relation to the deletion or retention of information or any obligation not to delete the information.</p>
LiveJournal	Yes	<p>Users can edit their LiveJournal Account information at any time.</p> <p>Users can delete their account at any time by visiting the Account Deletion page.</p> <p>If may take some time for all of the content to be deleted and purged from serves.</p> <p>LiveJournal reserves the right to retain and/or keep personal information to the extent it is necessary to protect LiveJournal's legal interests or comply with court orders, etc.</p>
Meetup	Yes	<p>Upon request Meetup will deactivate account and remove PII from active databases as soon as reasonable possible. To make this request, email is provided.</p> <p>Nonetheless, Meetup will retain in their files information that the user may have requested them to remove if, in their discretion, retention of the</p>

Social Network	Findings	Notes
		<p>information is necessary to resolve disputes, troubleshoot problems or to enforce the Terms of Service.</p> <p>“Furthermore, your information is never completely removed from our databases due to technical and legal constraints (for example, we will not remove your information from our back up storage).”</p>
MySpace	Yes	If user asks Myspace to stop using their PII, Myspace will honor that request while retaining any record of PII that is necessary to comply with applicable federal, state or local law.
Nexopia	Yes	<p>Individuals can request that Nexopia delete their PI from Nexopia system and records. However, due to technical constraints and the fact that Nexopia backs up its system, PI may continue to reside in Nexopia’s systems after deletion.</p> <p>Individuals should not expect that their PI would be completely removed from Nexopia systems in response to an accepted request for deletion.</p>
Ping (Apple)	Yes	Users can request to have data deleted if Apple is not required to retain it by law or for legitimate business purposes. Deletion requests can be made through the online ‘Privacy Contact Form.’
Pinterest	Yes	<p>Users can delete Personal Information in their User account by contacting Pinterest or by editing their profile.</p> <p>If user completely deletes all of their PI, their User account may become deactivated.</p> <p>Pinterest may retain an archived copy of users records as required by law or for legitimate business purposes.</p>
Plenty of Fish	No*	“We keep your information only as long as we need it for legitimate business purposes and to meet any legal requirements. Personal information used to make a decision that directly affects an individual will be kept for at least one year after such a decision. We have retention standards that meet these parameters.”
Reddit	No	
Tumblr	Yes	User can delete account from Preferences page or by emailing Tumblr and providing proof of authority over the account.

Social Network	Findings	Notes
		<p>Deleting account may not fully remove the content that is published from Tumblr’s systems, as caching of, backups of, copies of, or references to user’s account information may not be immediately removed.</p> <p>Given the nature of sharing on Tumblr, some of the public activity on the account prior to deletion may remain stored on servers and accessible to the public.</p>
Twitter	Yes	<p>Link with instructions relating to deactivating and deleting account provided.</p> <p>For up to 30 days after deactivation it is still possible to restore account. After 30 days, Twitters begins the process of deleting users account from their system, which can take up to a week.</p>
Wikimedia Foundation	No	
WordPress.com	No	Link for ‘support team’ is provided for those with questions about deleting or correcting their personal data.
WordPress.org	No	
World of Warcraft	Yes	<p>Users can request to have PI deleted by contacting Privacy Policy Administrator at mailing address or email provided.</p> <p>Request will be responded to within 30 days.</p> <p>In some cases they may not be able to delete PI and will retain and use such information as necessary to comply with legal obligations, resolve disputes, and enforce agreements.</p> <p>The deletion of data will lead to the termination of account and applicable services.</p>
YouTube (Google)	See: Blogger (Google)	
Zynga	Yes	<p>If user no longer wants Zynga to make active use of their information they may send an email to <a href="mailto:privacy@zynga.com">privacy@zynga.com</a>.</p> <p>Instructions to place “Delete My Account” in the subject line and include name, email address, and user ID</p>

Social Network	Findings	Notes
		<p>number for the Social Network from which you access Zynga games in the body of the email.</p> <p>They will respond to request within 30 days.</p> <p>Certain records, for example those pertaining to payments or customer service matters, will be retained for legal and accounting purposes.</p>

**g) Do you have to be an active user to make use of stated procedures?**

Social Network	Findings
Blogger (Google)	N/A
Club Penguin	N/A
Facebook	No
Flickr (Yahoo)	N/A
Foursquare	N/A
Google +	See: Blogger (Google)
Instagram	N/A
LinkedIn	N/A
LiveJournal	N/A
Meetup	N/A
MySpace	N/A
Nexopia	No
Ping (Apple)	N/A
Pinterest	N/A
Plenty of Fish	N/A
Reddit	N/A
Tumblr	N/A* (Only registered users can access and delete most information associated with their account by logging into the services and checking account settings page. Both registered and unregistered users can access and delete cookies through web browser settings.)
Twitter	N/A
Wikimedia Foundation	N/A* (Editors are not required to register with a project. Anyone can edit without logging in with a username.)
WordPress.com	N/A
WordPress.org	N/A
World of Warcraft	Maybe, See 2. d)
YouTube (Google)	See: Blogger (Google)
Zynga	N/A

### 3. CAPTURE OF PII

a) Is there specification of the kinds of PII collected? If so, what types of categories are listed? Are justifications/descriptions for the capture of PII given?

Social Network	Findings	Notes
Blogger (Google)	Collects the information you give them: name, email address, telephone number, credit card, billing address.	<p>Google captures PI to tailor content (i.e. search results, ads) to user.</p> <p>Collects info from cookies and other technologies to improve user experience and the overall quality of services.</p> <p>Google “may combine personal information from one service with information, including personal information, from other Google services.”</p>
Club Penguin	Parent’s email address May collect parent’s full name, email address, and credit card, and billing information when membership is purchased.	Parent’s email address is required: to participate in the Club Penguin virtual world, play games, view content; to receive promotional messages; for notification pertaining to the child’s account, features of the website, and periodic newsletters; to track usage and ensure users are following Terms of Use; May use info in the aggregate to analyze site usage, and to offer products, programs, or services.
Facebook	<p>Collects the information required when you sign up for the site, as well as the information the user chooses to share. (e.g. postings, updates, photos, etc.)</p> <p>Receive data from user’s interaction with Facebook (e.g. when user looks at another friend’s timeline, sends or receives a message, etc.)</p>	<p>Uses information to keep Facebook products, services and integrations safe and secure;</p> <ul style="list-style-type: none"> <li>• To protect Facebook’s or others’ rights or property;</li> <li>• To provide user with location features and services’</li> <li>• To measure or understand the effectiveness of adverts;</li> <li>• To make suggestions to user (e.g. to add a friend.);</li> <li>• For internal operations, including troubleshooting, data analysis,</li> </ul>

Social Network	Findings	Notes
		testing, research and service improvement.
Flickr (Yahoo)	<p>Name, gender, birth date, postal code and email address.</p> <p>Collects information about user's transactions with Yahoo! and with their business partners, including info about user's use of financial products and services that they offer.</p> <p>Automatically receives and records information from computer &amp; browser, including IP address, Yahoo! cookie information, software and hardware attributes, and the page you request.</p>	<p>"Once you register with Yahoo! and sign in to our services, you are not anonymous to us."</p> <p>"Yahoo! uses information for the following general purposes: to customize the advertising and content you see, fulfill your requests for products and services, improve our services, contact you, conduct research, and provide anonymous reporting for internal and external clients."</p>
Foursquare	<p>May collect name, email address, phone number, birthday, Twitter and/or Facebook usernames, information regarding use of Service, and browser info.</p>	<p>PII used for: allowing you to set up a user account and profile, improving the content of the Service, customizing advertising and content, communicating with user about specials and new features.</p> <p>PII may be used in order to adapt the Services of our community to your needs, to research the effectiveness of our network and Services, and to develop new tools for the community.</p>
Google +	See: Blogger (Google)	
Instagram	<p>Collects potentially personally-identifying information like IP addresses.</p> <p>The amount and type of information that Instagram gathers depends on the nature of the interaction. For example, we ask visitors who sign up for an account... to provide a username and email address.</p> <p>Uses cookies to identify and track visitors, their usage of Instagram,</p>	<p>"Instagram collects such information only insofar as is necessary or appropriate to fulfill the purpose of the visitor's interaction with Instagram."</p>

Social Network	Findings	Notes
	and their website access preferences.	
LinkedIn	<p><i>Registration:</i> Name, email, employer, country, and password.  <i>Profile information:</i> user may provide additional info describing skills, professional experiences, educational background, recommendation for other users, group memberships, and networking objectives.</p> <p><i>Contacts information:</i> name and email addresses of people user has invited to site.</p> <p><i>Customer Service:</i> information collected when user interacts with LinkedIn’s customer service website.</p> <p><i>Through Use of Site and Applications:</i> receive info when user interacts with the site, applications (e.g. LinkedIn for iPhone, Android, etc.), and platform technology (e.g. ‘Share on LinkedIn’ plugins.)</p> <p>Use of Third Party Services and Visiting Third Party Sites Cookies</p> <p>Advertising and Web Beacons Log Files, IP Addresses &amp; info about computer and mobile device.</p>	<p>PI is collected for the purpose of becoming a user, enabling user to share their information and communicate with other users, to provide personal details to third parties offering combined services with LinkedIn, administering user’s account, customizing service to user, contact user, connect user to opportunities by enabling other professionals to find user on LinkedIn, and to create and distribute advertising relevant to user.</p>
LiveJournal	<p>Name, date of birth, contact information.</p> <p>May occasionally obtain IP address Information user shares through LiveJournal</p>	<p>May use PI in order to investigate or complete a transaction, and may use email address to contact user about account or service updates.</p> <p>IP address is used to: diagnose and prevent service or technology problems,</p>

Social Network	Findings	Notes
		estimate the number of users visiting LiveJournal from various geographic regions, track public and internal access to content, services, and/or resources, monitor and prevent fraud, Spam, and abuse, deliver more relevant advertisements to you.
Meetup	<p>Nickname selected by user, email address, name (if provided), password and zip code.</p> <p>IP address.</p>	<p>Uses the information:</p> <ul style="list-style-type: none"> <li>to do internal research on member's usage patterns, demographics, interests and general behavior to better understand and serve user and community.</li> <li>to create a better, more personalized experience for user based on their individual usage habits, improve marketing and promotional efforts, analyze site usage, improve content and product offerings, and customize site's content, layout, and Services.</li> <li>to resolve disputes, troubleshoot problems, and enforce Terms of Service Agreement.</li> </ul>
MySpace	Users may volunteer: name, email, mailing address, telephone number, and credit card number.	Myspace allows user to search for members using Registration PII, and to browse for certain profile information. May periodically use email address to send material related to Myspace Services.
Nexopia	<p>Includes, but is not limited to: name, email, username, sex, location and age.</p> <p>Users may also submit and post additional 'Profile Data' including, but not limited to weight, height, sexual orientation, dating, living situation, information regarding interests, and photographs. Profile Data is not Personal Information collected by Nexopia.</p>	<p>May use email address to respond to inquiries or send updates or other news regarding Nexopia service.</p> <p>Also uses PII to deliver advertising content that is believed to be of interest or use to that member.</p>
Ping (Apple)	May collect name, mailing address,	Allows Apple to communicate latest

Social Network	Findings	Notes
	<p>phone number, email, contact preferences, and credit card information.</p> <p>When you share your content with family and friends using Apple products, Apple may collect the information you provide about those people such as name, mailing address, email address, and phone number.</p> <p>In the US, Apple may ask for Social Security number but only in limited circumstances such as when setting up a wireless account and activating your iPhone or when determining whether to extend commercial credit.</p>	<p>product announcements, software updates, upcoming events, changes in terms, conditions, and policies.</p> <p>Helps them to improve services, content, and advertising.</p> <p>To help develop, deliver, and improve products, services, content, and advertising.</p> <p>For internal purposes such as auditing, data analysis, and research to improve Apple’s products, services, and customer communications.</p> <p>If you enter into a sweepstake, contest, or similar promotion, Apple may use the information to administer those programs.</p>
Pinterest	<p>When you register, Pinterest will collect PII that may include, but is not limited to: name, gender, profile photo, free-form biography, location/hometown, website and email address.</p>	<p>Pinterest uses your PI for account registration, communications, customer service, finding friends, and emailing via a Pinterest Account.</p>
Plenty of Fish	<p>May collect contact information (e.g. name and email address), personal preferences (e.g. language preferences, marketing consent), and profile information (e.g. photographs, other information provided in your personal profile, interests, marital status, height, weight, occupation)</p>	<p>May uses PI for a number of different business purposes, for example to:</p> <ul style="list-style-type: none"> <li>• Create and display your online dating profile to other users;</li> <li>• Show others users when you have viewed their profiles;</li> <li>• Compare your profile/preferences with other users to find potential matches;</li> <li>• Provide customer support;</li> <li>• Conduct surveys</li> <li>• Advise you of changes, or new services;</li> <li>• Measure/improve the effectiveness of Website and marketing endeavors;</li> <li>• Detect and protect against fraud and</li> </ul>

Social Network	Findings	Notes
		error.
Reddit	<p>Email address, name, phone number, age, gender, user name, password.</p> <p>Cookies may contain PII and such cookies may be shared with affiliates and other companies.</p>	Used to grant you access and use of the Website, to provide the service you have requested, to communicate with you about new features, products and/or services, and to improve the services that they offer by tailoring them to your needs.
Tumblr	<p>Account Information: username, password and email address, birthday.</p> <p>May obtain your gender, for example, from a third party that is linked to Tumblr account.</p> <p>May collect financial information from credit card, but that information is stored by a third party payment processor.</p> <p>IP address may be associated with user's account and may be used to personalize the Services for user.</p>	Used to improve and personalize the Services for user, and to communicate with users.
Twitter	Personal information: name, username, password, and email address.	Twitter Services are primarily designed to help you share information with the world.
Wikimedia Foundation	Username, email address, IP address, and other raw log data.	The Foundation limits the collection of PII data to purposes which serve the well-being of its projects, including but not limited to the following: enhancing the public accountability of the projects, to provide site statistics, to solve technical problems, and for communication.
WordPress.com	Username and email address. Those engaging with transactions with Automattic are asked to provide additional information, including the personal and financial information necessary to process those transactions.	The amount and type of information that Automattic gathers depends on the nature of the interaction. In each case, Automattic collects such information only insofar as is necessary or appropriate to fulfill the purpose of the visitor's interaction with Automattic.
WordPress.org	Username and email address.	The amount and type of information

Social Network	Findings	Notes
		<p>that WordPress.org gathers depends on the nature of the interaction. In each case, WordPress.org collects such information only insofar as is necessary or appropriate to fulfill the purpose of the visitor's interaction with WordPress.org.</p>
World of Warcraft	<p>PI collected may include: name, home address, phone number, and/or email address. Visitors purchasing products/ services will be required to provide additional information such as credit card number, expiration date, and shipping and billing address.</p>	<p>The PI you provide Blizzard with allows them to fulfill your product or service order; alert you of new products or services; handle customer service or technical support questions/issues; communicate with you; notify you about upgrade opportunities, contests, etc.</p> <p>“Blizzard may enhance or merge the PI collected at a Blizzard site with data from third parties in order to update your contact information, perform market analysis, or improve their products, services, or systems.”</p> <p>“Blizzard may also provide your personal information to other companies or organizations that offer products or services that may be of interest to you. In such cases, we will notify you that the information will be shared and provide you with an opportunity to opt-out.”</p> <p>May use PII for internal marketing, profiling, or demographic purposes.</p>
YouTube (Google)	See: Blogger (Google)	
Zynga	<p>Zynga may access and store some or all of the following personal information: name, profile picture or its URL, user ID number, the user ID numbers and other public data for your friends, login email, physical location and that of access devices, gender, birthday.</p>	<p>In general, Zynga collects, stores, and uses your information to provide a safe, smooth, efficient, and customized experience. For example, they may use information: to create your game accounts, to identify and suggest connections with other Zynga users, to enable user-to-user communications, to</p>

Social Network	Findings	Notes
		<p>provide technical support and respond to inquiries, to prevent fraud or potentially illegal activities, to deliver and target advertising, to notify users of updates, new products or promotional offers, to provide leader boards and promote player achievements, to solicit input and feedback to improve Zynga products/services, and customize your user experience.</p>

**b) What information does the organization consider Personally Identifying Information (PII), and what does it consider non-PII?**

Social Network	Findings	Notes
Blogger (Google)	<p>Personal information is the information that the user provides to Google which personally identifies user, “such as your name, email address or billing information, or other data which can be reasonably linked to such information by Google.”</p> <p>Google may collect information from the user’s use of their services such as: device-specific information, log information (i.e. how service is used, telephony log info, IP address, device event info, cookies), location information (i.e. GPS signals, location from Wi-Fi access points and cell towers), Unique application numbers, local storage, and cookies and anonymous identifiers.</p>	Google does not specify whether the information they get from our use of their services is non-personally identifiable information.
Club Penguin	<p>PII: see 3. a)</p> <p>Non- PII: Country of residence, user’s favorite color, computer operating system, IP Address, web browser, frequency of use.</p>	Much of Non-PII is collected through software technologies such as cookies.
Facebook	<p>Information that is always publicly available: Name, Profile Pictures and Cover Photos, Network, Gender, Username and User ID. May receive info such as the time, date, and place you took a photo or video.</p> <p>May collect IP address, Internet service, location, type of browser, or the pages you visit, GPS location.</p> <p>Receives data from games, application, websites using Facebook Platform through cookies.</p> <p>Receives data from advertising partners, customers and other third parties.</p>	Does not specify whether the information they get from our use of their services is non-personally identifiable information.
Flickr (Yahoo)	No distinction made. [See 3. a)]	
Foursquare	PII: see 3. a)	“We treat this data as non-

Social Network	Findings	Notes
	Non- PII: user's location, IP address, cookie information, and the page user requested.	Personal Information, except where we are required to do otherwise under applicable law."
Google +	See: Blogger (Google)	
Instagram	<p><i>PII</i>: username and email address.</p> <p><i>Potentially PII</i>: IP address</p> <p><i>Non-PII</i>: browser type, language preference, referring site, data and time of each visitor request.</p>	
LinkedIn	<p><i>PII</i>: name, email.</p> <p><i>Non-PII</i>: information provided to third parties through cookies, but may provide general segment information (e.g. you industry, geography, career field, professional or educational background)</p> <p>Ads targeted to user based on non-PII such as compensation bracket, gender, age, ethnic origin, nationality, or other aspects of your life.</p>	The link between user's IP address and PII is not shared with third parties without their permission.
LiveJournal	<p><i>PII</i>: name, data or birth, contact information.</p> <p><i>Non-PII</i>: interests, schools, and other biographical data, browser info, IP address, cookies, pages user requests.</p>	
Meetup	<p><i>PII</i>: email address, IP address, name.</p> <p><i>Non-PII</i>: information obtained from cookies and web beacons such as URL you came from and go to, browser information.</p>	
MySpace	<p><i>PII</i>: name, email, mailing address, telephone number, and credit card number.</p> <p><i>Non-PII</i>: IP address, aggregate user data, browser type, date of birth, interests, hobbies, lifestyle choices, affiliated groups, videos, pictures, private messages, bulletins, personal statements, info collected from cookies.</p>	

Social Network	Findings	Notes
Nexopia	<p><i>PII:</i> See 3. a)</p> <p><i>Non-PII:</i> IP address, aggregate user data, browser type.</p>	
Ping (Apple)	<p><i>PII:</i> see 3. a)</p> <p><i>Non-PII:</i> occupation, language, zip code, area code, unique device identifier, location, time zone where an Apple product is used, customer activities on website, iCloud and MobileMe services, and iTunes Store, information collected by cookies and other technologies.</p> <p>Also automatically collects: IP address, browser type and language, internet service provider, referring and exist pages, operating system, data/time stamp, and clickstream data.</p>	<p>“We treat information collected by cookies and other technologies as non-personal information. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information. Similarly, to the extent that non-personal information is combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Policy.”</p>
Pinterest	<p><i>PII:</i> see 3. a)</p> <p><i>Non-PII:</i> not specified.</p> <p><i>Other info:</i> log data (browser type, the webpage you were visiting before you came to the Service, pages you visit on Pinterest, time spend on those pages, information searched on Pinterest, access times and dates), information from cookies.</p>	
Plenty of Fish	<p><i>PII:</i> see 3. a)</p> <p><i>Non-PII:</i> browser type, referring URL, aggregate, non-personal customer information, tracking information from web beacons or pixel tags.</p> <p><i>Other info collected automatically:</i> IP address of your computer, IP address of Internet Service Provider, date and time accessed the website, internet address of the</p>	<p>“None of the tracking information in these reports can be connected to the identities or other personal information of individual users. For our own research purposes we may link tracking information with personal information voluntarily provided by Web Site users. Once such a link is</p>

Social Network	Findings	Notes
	<p>web site from which you linked directly to PoF, operation system, sections of the web site you visit, the web site pages read and images viewed, content you download from the website.</p>	<p>made, all of the linked information is treated as personal information.”</p>
Reddit	<p><i>PII</i>: see 3. a)</p> <p><i>Non-PII</i>: automatically collects information about type of browser, operating system, the website that referred you, IP address, time of visit, content viewed, ads viewed, and other clickstream data.</p>	
Tumblr	<p><i>PII</i>: see 3. a)</p> <p><i>Non-PII</i>: browser type and version, device used, operating system and version, language preference, website or service that referred you to the Tumblr, data and time of web request, screen display information, information from any cookies, web browser extensions.</p> <p><i>Potentially PII</i>: IP address, location information, information related to mobile device, such as phone number, information about contacts.</p>	<p>Other information: may collect information describing acamera and camera settings, general usage information, number and frequency of visitors, which pages or feature of the Services are visited, links clicked on, length of visits, derived information (e.g. what kinds of blogs user likes to follow).</p>
Twitter	<p><i>PII</i>: see 3. a)</p> <p><i>Non-PII</i>: public user profile information, public Tweets, the people you follow or that follow you, number of users who clicked on a particular link.</p> <p><i>Other information collected</i>: Short biography, location, your website, picture, cell phone number, address book; Tweets, lists you create, people you follow, Tweets you mark as favourites or Retweet; How you interact with links across Twitter, Website usage data from cookie technology, log data (IP address, browser type, operating system, the referring web page, pages visited, location, mobile carrier, device and</p>	<p>For the most part, Twitter does not specify whether the information collected is PII or non-PII.</p>

Social Network	Findings	Notes
	application IDs, search terms, and cookie information).	
Wikimedia Foundation	<i>PII</i> : see 3. a)  <i>Other information</i> : user contributions, (such as the times at which users edited and the number of edits they have made), pages visited.	
WordPress.com	<i>PII</i> : see 3. a)  <i>Non-PII</i> : browser type, language preference, referring site, and the date and time of each visitor request.  <i>Potentially PII</i> : IP address	
WordPress.org	<i>PII</i> : see 3. a)  <i>Non-PII</i> : browser type, language preference, referring site, and the date and time of each visitor request.  <i>Potentially PII</i> : IP address	
World of Warcraft	<i>PII</i> : see 3. a)  <i>Non-PII</i> : username, password, age, date or birth, gender, game/platform preferences; geographic location, information regarding your computer, information from cookies and clear gifs.	
YouTube (Google)	See: Blogger (Google)	
Zynga	<i>PII</i> : See 3. a)  <i>Other information collected</i> : mobile device identifiers (including MAC Address and IP Address), may collect name associated with device, device type, telephone number, country, and any other information you choose to provide, such as user name, character name, geo-location or email address.  If you purchase a license, Zynga will collect the billing and financial information	Your first and last names and profile picture are considered public.  Some of the cookies the Services places on user's computer are linked to their user ID numbers.

Social Network	Findings	Notes
	<p>necessary to process charges, which may include postal code and email address. Zynga may also receive the billing and payment information that you provide when purchase is processed by another party (e.g. Facebook or Apple).</p> <p>Usage statistics about users interactions with the Service is collected (typically through server log files, web log files, mobile device software development kits, and browser cookies).</p>	

**c) Is any distinction made between sensitive and non-sensitive PII?**

Social Network	Findings	Notes
Blogger (Google)	Yes	Sensitive personal information is defined as “a particular category of personal information relating to confidential medical facts, racial or ethnic origins, political or religious beliefs or sexuality.”  Google “will not associate a cookie or anonymous identifier with sensitive categories.”
Club Penguin	Yes	Sensitive information includes credit card number and membership subscription form.
Facebook	No	
Flickr (Yahoo)	No	
Foursquare	No	
Google +	See: Blogger (Google)	
Instagram	No	
LinkedIn	Yes	Example of sensitive data is credit card information.
LiveJournal	No	
Meetup	No	
MySpace	No	
Nexopia	No	
Ping (Apple)	No	
Pinterest	Yes	Pinterest recommends that “you guard and refrain from disclosing any information you consider sensitive and confidential.”
Plenty of Fish	No	
Reddit	No	
Tumblr	No	
Twitter	No	
Wikimedia Foundation	No	
WordPress.com	No	
WordPress.org	No	
World of Warcraft	No	
YouTube (Google)	See: Blogger (Google)	
Zynga	No	

**d) Is any distinction made between information on children/adults?**

Social Network	Findings
Blogger (Google)	No
Club Penguin	Yes; distinction made between PII of the registrant’s parent and PII that the child has submitted to the site.
Facebook	No
Flickr (Yahoo)	Yes; Yahoo! does not contact children under age 13 about special offers or for marketing purposes without a parent’s permission. Yahoo does not ask a child under age 13 for more personal information, as a condition of participation, than is reasonably necessary to participate in a given activity or promotion.
Foursquare	No
Google +	See: Blogger (Google)
Instagram	No
LinkedIn	Yes
LiveJournal	Yes; LiveJournal “will not knowingly collect personal information from children under the age of 13, and any information inadvertently gathered will be promptly deleted.”
Meetup	No
MySpace	Yes; Myspace does not knowingly collect PII from children under 13 years of age.
Nexopia	Yes; Nexopia refuses to open an account for a person under the age of 13. If they learn that information from a child under the age of 13 has been submitted to them, the account and information will be deleted as soon as possible.
Ping (Apple)	Yes; Apple does not knowingly collect personal information from children under 13.
Pinterest	Yes; Pinterest does not knowingly collect PII from children under 13. If they become aware that a child under 13 has provided them with PI, the information will be deleted from the file.
Plenty of Fish	No
Reddit	Yes; No one under age 13 is allowed to provide any PI or use public discussion areas, forums and chats.
Tumblr	No
Twitter	Yes; Twitter does not knowingly collect personal information from children under 13. If Twitter becomes aware that a child under 13 has provided them with PI, they will take steps to remove such information and terminate the child’s account. Link for ‘additional resources for parents and teens’ is provided.
Wikimedia Foundation	No
WordPress.com	No

Social Network	Findings
WordPress.org	No
World of Warcraft	Yes; Blizzard does not collect or store PII (e.g. name, address, or email address) once a child has stated that his/her age is under 13.
YouTube (Google)	See: Blogger (Google)
Zynga	Zynga does not knowingly collect any PI from children under the age of 13. If Zynga learns that they have inadvertently gathered PI from children under the age of 13, they will take reasonable measures to promptly erase such information from their records.

**e) With adult consent, can children sign up for the service? Are there special restrictions/waivers for such a process?**

Social Network	Findings
Blogger (Google)	N/A
Club Penguin	Parent's email address is necessary for registration.  Parents are notified about child user's activities on the site.
Facebook	Minors can sign up for the service with parental consent.  Restrictions: cannot receive messages from anyone on FB, only friends and friends of friends; cannot share posting with public, only friends of friends; only friends and friends of friends can tag minors.
Flickr (Yahoo)	N/A
Foursquare	Service is not available to individuals who are younger than 13 years old.
Google +	See: Blogger (Google)
Instagram	You must be 13 years or older to use this site. (From Terms of Service)
LinkedIn	Children under the age of 19 are not eligible to user LinkedIn service.
LiveJournal	You must be at least 13 years of age to use the Service.
Meetup	Must be at least 18 years of age. (From Terms of Service)
MySpace	Must be 13 years of age or older. (From Terms of Service)
Nexopia	For persons between the ages of 13 and 18, Nexopia requires parental or guardian consent prior to opening an account.
Ping (Apple)	N/A
Pinterest	Any use or access to the Service by anyone under the age of 13 is strictly prohibited. (From Terms of Service)
Plenty of Fish	Must be 18 years old. (From Terms of Service)
Reddit	The Website is not intended for use by children, especially those under age 13.  Minors between the ages of 13 and 17 must get the permission of their parent(s) or legal guardian(s) before making purchases, including subscriptions.  (Website, however, does not ask for birthday when registering.)
Tumblr	No individual under the age of 13 may use Tumblr or provide any information to Tumblr or otherwise through the Services. (From Terms of Service)
Twitter	Twitter Services are not directed to persons under 13.

Social Network	Findings
Wikimedia Foundation	Registration is not necessary to contribute to a Project.
WordPress.com	N/A
WordPress.org	N/A
World of Warcraft	Implicitly states that child must be at least 12 years old to use service.
YouTube (Google)	See: Blogger (Google)
Zynga	Zynga websites and games are not intended for children under the age of 13.

**f) Does it state what information is required to be provided at sign-up?**

Social Network	Findings	Notes
Blogger (Google)	Yes	When signing up for a Google Account, Google will ask for “personal information, like your name, email address, telephone number or credit card. If you want to take full advantage of the sharing features we offer, we might also ask you to create a publicly visible Google Profile, which may include your name and photo.”
Club Penguin	Yes	Child’s account name, parent’s email address, child’s password.
Facebook	Yes	Name, email address, birthday, and gender.
Flickr (Yahoo)	Yes	Name, gender, birth date, postal code and email address.
Foursquare	No	
Google +	See: Blogger (Google)	
Instagram	Yes	Username and email address.
LinkedIn	Yes	To become a user, you must provide a name, email address, country, and password.  LinkedIn also requests other information during registration process (e.g. gender, location, etc.).
LiveJournal	Yes	LiveJournal collects certain personal information when you register for the Service, including: your name, date of birth, and contact information.
Meetup	No	
MySpace	Yes*	It’s a bit unclear, Policy states: “This Privacy Policy describes Myspace’s use and sharing of personally identifiable information (“PII” – your full name, email address, mailing address, telephone number, or credit card number) that Members voluntarily provide to Myspace when they register.”
Nexopia	Yes	When opening an account, Nexopia collects PI that includes, but is not limited to: name, email, username, sex, location and age.
Ping (Apple)	No	
Pinterest	Yes	May include, but is not limited to, name, gender, profile photo, free-form biography, location/hometown, website and email address.

Social Network	Findings	Notes
Plenty of Fish	No	
Reddit	No	
Tumblr	Yes	When you create a Tumblr account you will provide information such as: username, password, and email address. You may also be required to provide your birthday.
Twitter	Yes	Name, username, password, and email address.
Wikimedia Foundation	Yes	Username, password required; email address optional.
WordPress.com	Yes	Visitors signing up for a blog at WordPress.com are asked to provide a username and email address.
WordPress.org	No	
World of Warcraft	No	
YouTube (Google)	See: Blogger (Google)	
Zynga	Yes	<p>User may register with Zynga by using Facebook Connect or other Social Network authentication options</p> <p>User may also provide a more typical registration where they will be required to provide: age, birthday, name, email address, password, and other information that helps Zynga confirm that it is them accessing their account.</p> <p>May also offer user the option to complete a user profile that may include: a profile photo, game username(s), gender, biographic details, links to profiles on various Social Network, details about games played, and a Zynga user ID number.</p>

## 4. Disclosure of Information

**a) Is there a specification of the kinds of organizations that users' information may be disclosed to? How explicit are such specifications (e.g. "...we may share information with other parties" versus "...we may share information with Google for analytics" versus "we share information with Google for analytics purposes")?**

Social Network	Notes
Blogger (Google)	<p>Google will not share PII with companies, organization and individuals outside of Google unless:</p> <ul style="list-style-type: none"> <li>• With user's consent.</li> <li>• With domain administrators</li> <li>• For external processing. "We provide personal information to our affiliates or other trusted businesses or person to process it for us."</li> <li>• For legal reasons</li> <li>• Google may share aggregated, non-personally identifiable information publicly and with their partners (e.g. publishers, advertisers, or connected sites.)</li> </ul>
Club Penguin	<p>Personal information may be transferred to individual companies of The Walt Disney Family of Companies or third parties.</p> <p>May disclose information when required by law or in response to a law enforcement agency's or public agency's request.</p> <p>May disclose information to data processors who act on site's behalf.</p>
Facebook	<p>"We use the information we receive about you in connection with the services and features we provide to you and other users like your friends, our partners, the advertisers that purchase ads on the site, and the developers that build the games, applications, and websites you use."</p>
Flickr (Yahoo)	<p>Yahoo! does not rent, sell, or share PI with other people or non-affiliated companies except to provide products or services you've requested, when we have your permission, or under the following circumstances:</p> <ul style="list-style-type: none"> <li>• "We provide the information to trusted partners who work on behalf of or with Yahoo! under confidentiality agreements."</li> <li>• "When you register for a Yahoo! account, your registration information and other data will be transmitted to the United States and/or other countries for processing and storage by Yahoo! and its affiliates... we may provide your personal information to a Yahoo! affiliate worldwide."</li> </ul>

Social Network	Notes
	<ul style="list-style-type: none"> <li>• “We respond to disclosure demands if permitted or required by law.”</li> <li>• “We transfer information about you if Yahoo! is acquired by or merged with another company.”</li> <li>• Yahoo! lets other companies that show advertisements on some of their pages set and access their cookies on your computer.</li> </ul>
Foursquare	<p>Information is shared with other companies and people who are employed to perform tasks on Foursquare’s behalf.</p> <p>Certain PII may be made available to third party developers if user or user’s friends use third party apps.</p> <p>Information will be shared with business partners when it is related to transactions with that business unless user has elected not to be solicited by marketing partners during the registration process or through the account settings page.</p> <p>If foursquare is acquired, or in the unlikely event that foursquare goes out of business or enters bankruptcy, user information would be one of the assets that is transferred or acquired by a third party.</p> <p>May release PII when it is necessary to comply with the law, enforce or apply their conditions of use and other agreements; or protect the rights, property, or safety of foursquare, their employees, users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.</p> <p>If user or user’s friends adds their home address as a venue, that information may be available to others and may be published by third parties without foursquare’s control.</p> <p>Foursquare uses Google Analytics.</p>
Google +	See: Blogger (Google)
Instagram	<p>Instagram discloses potentially PII and PII only to its employees, contractors and affiliated organizations that:</p> <ul style="list-style-type: none"> <li>• Need to know the information to process it on Instagram’s behalf or to provide services available at Instagram’s websites.</li> <li>• “Have agreed not to disclose it to others. Some of these employees, contractors and affiliated organizations may be located outside of your home country; by using Instagram’s websites, you consent to the transfer of such information to them.”</li> <li>• Discloses potentially PII and PII when required to so by law, or when Instagram believes in good faith that disclosure is reasonably</li> </ul>

Social Network	Notes
	<p>necessary to protect the property or rights of Instagram, third parties or the public at large.</p>
LinkedIn	<p>LinkedIn will not share PI to third parties without user’s explicit consent unless: to comply with legal process, enforce this Agreement, respond to violations of the rights of third parties, to respond to customer service inquiries, or to protect the rights, property, or personal safety of LinkedIn, their users, or the public.</p> <p>LinkedIn provides aggregated anonymous data to third parties. LinkedIn collaborates with third parties (LinkedIn Partners and Platform Developers) which may access and share certain information about the user.</p> <p>LinkedIn may disclose user’s personal information and other information to a third party as part of a sale of the assets of LinkedIn Corporation.</p>
LiveJournal	<p>LiveJournal may share your identifiable personal information with third parties under the following circumstances:</p> <ul style="list-style-type: none"> <li>• Operations: service providers, contractors, and vendors may be granted accesses to internal systems that contain PI in order to improve operations and Service.</li> <li>• Sponsored Contests and Giveaways: If you participate in a contest, etc. LiveJournal may transfer PII to third party advertiser or service provider, but will do their best to warn user when they are agreeing to this sharing.</li> <li>• Ad Service: LiveJournal may share aggregate and Non-PII generalized data to third parties.</li> <li>• Ad Networks: Ad networks may set cookies and/or include a web beacon enabling ad networks to provide auditing, research and/or reporting to advertisers. No PII will be shared through cookies.</li> <li>• Legal Process: They may share PII with U.S. Law enforcement officers.</li> <li>• Sale of Business: PII may be shared or transferred to the buyer if LiveJournal is sold.</li> </ul>
Meetup	<p>Cookies and web beacons provided by ‘site analytics’ partners are used.</p> <p>Information users provide through the registration process or post to the public areas of the website, or through the use of Meetup Platform (including name and location information) may be accessible by and made public through syndication programs and by search engines, metasearch tools, crawlers, metacrawlers and other similar programs.</p>

Social Network	Notes
	<p>May disclose PII when required by law, or if they have good-faith belief that such action is necessary to comply with a juridical proceeding, a court order or legal process, enforce the Terms of Service, respond to claims that your PI violates the rights of third parties, or protect the rights, property or personal safety of Meetup, its members and the public.</p>
MySpace	<p>Third party advertisements may set cookies on Myspace Services. Myspace Services may be linked to Internet sites operated by other companies, or carry advertisements from other companies.</p> <p>Third part advertisers utilize certain technologies to collect non-PII about your visit to or use of Myspace Services, including information about the ads they display, via a cookie placed on your computer that reads your IP address.</p> <p>May share PII with Myspace employees, agents and contractors who help manage/provide Myspace Services' information activities, or with outside contractors, agents or sponsors who help with the administration, judging and prize fulfillment aspects of contests, promotions, and sweepstakes.</p> <p>May provide your PII to a third party in instances where you have chosen to receive certain information and have been notified that the fulfillment of such a request requires the sharing of PII. May share PII with Affiliated Companies if they have a business reason to do so.</p> <p>Non-PII and/or Profile Information may be shared with outside companies to accomplish customization of advertising and marketing messages.</p> <p>Anonymous click stream, number of pages views calculated by pixel tags, and aggregated demographic information may also be shared with Myspace's advertisers and business partners.</p> <p>May access or disclose PII, Profile Information or non-PII in order to: protect legal rights, protect safety and security, protect against fraud or for risk management purposes, or comply with the law or legal process. May transfer PII to the party or parties involved in the event of a sale or merger of Myspace.</p>
Nexopia	<p>Will disclose PII about payment and member Profile Data to third party credit card process provider for billing/payment purposes and when there is suspicious credit card use or a dispute concerning a charge.</p>

Social Network	Notes
	<p>May contact financial institutions to verify credit card info and, in doing so, share information they receive about credit card and member.</p> <p>May share some or all of a member's PII with any parent company, subsidiary, joint ventures, or Affiliate companies.</p> <p>PII will likely be among the assets transferred if Nexopia goes through a merger, sale, or acquisition.</p> <p>Reserves the right and may be legally required to report certain materials such as, but not limited to, child pornography or terror plans. Some PII may be stored or processed by third parties, including contractors, business partners and affiliates located in the US. As a result, the governments, courts, or law enforcement or regulatory agencies may be able to obtain disclosure of your information through applicable laws in the US.</p> <p>Nexopia will not disclose PII to any third party except when required by law, to enforce Terms of Service or to protect Nexopia's rights, or to protect the safety of the public and members of and visitors to the service.</p>
Ping (Apple)	<p>At times Apple may make certain personal information available to strategic partners that work with Apple to provide products and services, or that help Apple market to customers.</p> <p>Apple shares PII with companies who provide services such as information processing, extending credit, fulfilling customer orders, delivering products to you, managing enhancing customer data, providing customer service, assessing your interest in Apple products and services, and conducting customer research or satisfaction surveys.</p> <p>It may be necessary, by law, legal process, litigation, and/or requests from public and governmental authorities for Apple to disclose PII. Apple may disclose information about user if they determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.</p> <p>May also disclose information if they determine that disclosure is reasonably necessary to enforce terms and conditions or protect Apple operations or users. Additionally, in the event of a reorganization, merger, or sale Apple may transfer any and all PII to the relevant third party.</p>

Social Network	Notes
Pinterest	<p>May share aggregated information (Non-PII and Log Data) with third parties for industry analysis, demographic profiling and other purposes.</p> <p>May employ third party companies and individuals for various specified reasons who will have access to Users PII.</p> <p>May share information on Pinterest account (including PII) with the Social Networks that you have linked to your Pinterest account.</p> <p>May disclose information to government or law enforcement officials or private parties if they believe it to be necessary or appropriate to respond to claims and legal processes.</p> <p>May sell, divest, transfer, assign, share or otherwise engage in a transaction that involves some or all of their assets, including any information described in this Policy.</p>
Plenty of Fish	<p>May use third party service providers (e.g. web hosting providers, data management providers and/or payment processors). When Plenty of Fish does use an outside company, they use contractual or other appropriate means to ensure that PI is used in a manner consistent with this Policy.</p> <p>When credit card details are provided, user consents to credit card details being provided to payment processors and financial institutions necessary to process your payment.</p> <p>Information stored outside of Canada may be accessible to law enforcement and authorities in accordance with applicable laws.</p> <p>May share PI with corporate subsidiaries, affiliates or divisions for internal business purposes</p> <p>May disclose information as permitted or required by law.</p> <p>Elements of PI will be used to create a list of users that advertisers may want to direct their campaigns to.</p>
Reddit	<p>May allow access to their database by third parties that provide services, such as technical maintenance or forums and job search software.</p> <p>May forward information to third parties for services such as credit card processing and order fulfillment.</p>

Social Network	Notes
	<p>You might provide information about yourself in areas of the site that may be managed by third parties.</p> <p>May provide information to advertisers.</p> <p>May provide access to their database in order to cooperate with official investigations or legal proceedings.</p> <p>Reddit reserves the right to use the information they collect about user’s computer, which may at times be able to identify user, for any lawful business purpose.</p> <p>Reserves the right to use, transfer, sell, and share aggregated anonymous data about users for any business purpose. Information about users may be among the transferred assets in a sale of Reddit.</p> <p>Cookies may contain PII and such cookies may be shared with affiliates and other companies.</p>
Tumblr	<p>By default, content published through the Tumblr is shared with the public.</p> <p>User may choose to share information provided to Tumblr with Third Party Services (e.g. by syndicating posts to Twitter or Facebook). In some cases, Information (such as IP address) is shared with third parties such as service providers, consultants and other agents. “You hereby consent to our sharing of Personal Information with our Agents.” Tumblr may also share or disclose non-PII aggregate info with people and entities they do business with.</p> <p>Tumblr uses third party applications and services such as Google Analytics and Quantcast to collect and analyze information related to use of the services.</p> <p>If Tumblr chooses to buy or sell business assets, user information will typically be one of the transferred business assets.</p> <p>Tumblr reserves the right to disclose any information as they reasonably believe is necessary to satisfy any law, regulation, legal process, governmental request, or governmental order, or to protect the rights, property, health or safety of Tumblr, users, any third parties or the public in general, including but not limited to situations involving possible violence, suicide or self-harm.</p>

Social Network	Notes
Twitter	<p>May share or disclose information at user's direction, such as when user authorizes a third-party web client or application to access their Twitter account.</p> <p>May share private personal information with service providers subject to confidentiality obligations.</p> <p>May preserve or disclose user's information if Twitter believes that it is necessary to comply with a law, regulation or legal request; to protect the safety of any person; to address fraud, security or technical issues; or to protect Twitter's rights or property.</p> <p>Information may be transferred or sold as part of Twitter's involvement in a bankruptcy, merger, acquisition, reorganization or sale.</p> <p>May share or disclose non-private, aggregated or otherwise non-PI.</p>
Wikimedia Foundation	<p>Dedicated users chosen by the community are given privileged access; users who have access to OTRS (the Foundation's ticketing system), or to the CheckUser and Oversight functions, users elected by project communities to serve as stewards or Arbitrators, Wikimedia Foundation employees, trustees, appointees, and contractors and agents employed by the Foundation, and developers and others with high levels of server access may have access to private identifiable information.</p> <p>May be compelled by law to disclose information about a registered user.</p>
WordPress.com	<p>Discloses potentially PII and PII only to those of its employees, contractors, and affiliated organizations that: need to know the information to process it on Automattic's behalf or to provide services, and have agreed not to disclose it.</p> <p>Discloses potentially PII and PII in response to a subpoena, court order or other governmental request, or when Automattic believes in good faith that disclosure is reasonably necessary to protect the property or rights of Automattic, third parties or the public at large.</p> <p>In the event of a business transfer, any acquirer of Automattic may continue to use visitors PI as set forth in the privacy policy.</p>
WordPress.org	<p>Discloses potentially PII and PII only to those of its employees, contractors, and affiliated organizations that: need to know the information to provide services, and have agreed not to disclose it.</p> <p>Discloses potentially PII and PII when required to do so by law, or</p>

Social Network	Notes
	<p>when WordPress.org believes in good faith that disclosure is reasonably necessary to protect the property or rights of WordPress.org, third parties, or the public.</p>
World of Warcraft	<p>May need to disclose PI to third party vendors to fulfill product orders, to process mailings, or to process, analyze, and/or store data on Blizzard's behalf.</p> <p>Reserves the right to disclose PII: as required by law; if it is necessary to identify, contact, or bring legal action against user that is violating the Terms of Service; causing injury to Blizzard's rights or property, other users, or anyone else; or to prevent fraud or other illegal activities.</p> <p>May disclose PII if Blizzard decides to sell a line of business to a third party.</p>
YouTube (Google)	See: Blogger (Google)
Zynga	<p>Zynga will provide information to third party companies to perform services on their behalf (e.g. payment processing, data analysis, email delivery, hosting services, customer service, and marketing efforts)</p> <p>In most Zynga games, user's Social Network friends will see their name, profile photo and descriptions of game activity. In many Zynga games friends and players will be able to see user's game profile, which may include name and profile photo, which in certain cases can reveal your Social Network User ID number or Zynga ID.</p> <p>May share aggregated information (non-PII), and technical information (including IP addresses, MAC addresses) with third party advertisers. Advertisers may also collect this information through tracking technologies like cookies and web beacons.</p> <p>"Your information, and the contents of all of your online communications (including without limitation chat text, voice communications, IP addresses and your personal information) may be accessed and monitored as necessary to provide the Service and may be disclosed" when: required in response to legal process, to satisfy any applicable laws or regulations, when the Service is being used in the commission of a crime, when there is an emergency that poses a threat to the health/safety of user, another person, or public, and in order to protect the rights or property of Zynga.</p> <p>In the event that Zynga undergoes a business transition, PII may be a portion of the assets sold.</p>

**b) Are these specifications consistent with the tracking that is revealed through Ghostery?**

Social Network	Findings
Blogger (Google)	Nothing picked up by Ghostery.
Club Penguin	Bluelithium, Google AdWords, MediaMind, Microsoft Atlas, Omniture, and Tribal Fusion.
Facebook	Nothing picked up by Ghostery.
Flickr (Yahoo)	ScoreCard Research Beacon. (Flickr homepage) Yahoo Analytics (on Privacy policy)
Foursquare	ChartBeat and Google Analytics
Google +	See: Blogger (Google)
Instagram	Google Analytics
LinkedIn	NetRatings SiteCensus, Quantcast, ScoreCard Research
LiveJournal	DoubleClick, Facebook Connect, Google +1, Google Analytics, Quantcast, ScoreCard Research, Twitter Button
Meetup	Facebook Connect, Google Analytics
MySpace	Google Analytics, ScoreCard Research
Nexopia	Google AdSense, Google Analytics, Tynt Insight
Ping (Apple)	Omniture
Pinterest	Facebook Connect, Google Analytics.
Plenty of Fish	Google Analytics, ScoreCard Research
Reddit	Google Analytics
Tumblr	Google Analytics, Quantcast
Twitter	Google Analytics
Wikimedia Foundation	Nothing picked up by Ghostery.
WordPress.com	Google Analytics, KissMetrics, Quantcast
WordPress.org	Google +1, Google Analytics.
World of Warcraft	Google Analytics
YouTube (Google)	See: Blogger (Google)
Zynga	Facebook Social Plugins, Google Analytics, Twitter Button.

**c) Does the company use the term ‘sharing’ or ‘selling’ or ‘[some other term]’ information to third parties?**

Social Network	Findings
Blogger (Google)	‘Sharing’
Club Penguin	‘Disclose’ and ‘transfer’
Facebook	‘Sharing’
Flickr (Yahoo)	‘Sharing,’ ‘provide’
Foursquare	‘Sharing’
Google +	See: Blogger (Google)
Instagram	‘Disclose’
LinkedIn	‘Sharing’ and ‘disclose’
LiveJournal	‘Sharing’ and ‘transfer’
Meetup	‘Sharing’ and ‘disclose’
MySpace	‘Sharing’
Nexopia	‘Sharing’ and ‘disclose’
Ping (Apple)	‘Sharing’ and ‘disclose’
Pinterest	‘Sharing’
Plenty of Fish	‘Sharing’ and ‘disclose’
Reddit	‘Use’ and ‘sharing’
Tumblr	‘Sharing’ and ‘disclose’
Twitter	‘Sharing’ and ‘disclose’
Wikimedia Foundation	‘Access’ and ‘release.’
WordPress.com	‘Disclose’
WordPress.org	‘Disclose’
World of Warcraft	‘Sharing’ and ‘disclose.’
YouTube (Google)	See: Blogger (Google)
Zynga	‘Sharing’

**d) Does the organization make note that it may/may not share information with law enforcement and, if it does, under what conditions? Is there a link to more information about disclosure to law enforcement?**

Social Network	Findings	Notes
Blogger (Google)	Yes, but there is no link to additional info.	<p>Google will share personal information with companies, organizations or individuals outside of Google if they have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:</p> <ul style="list-style-type: none"> <li>• Meet any applicable law, regulation, legal process or enforceable governmental request.</li> <li>• Enforce applicable Terms of Service, including investigation of potential violations.</li> <li>• Detect, prevent, or otherwise address fraud, security or technical issues.</li> <li>• Protect against harm to the rights, property or safety of Google, our users or the public as required or permitted by law.</li> </ul>
Club Penguin	Yes, but there is no link to additional info.	<p>Club Penguin may disclose information in response to a court order, a subpoena, or a law enforcement agency's or other public agency's (e.g. schools or children services) request if they feel as if the disclosure may:</p> <ul style="list-style-type: none"> <li>• Prevent the instigation of a crime</li> <li>• Facilitate an investigation related to public safety</li> <li>• Protect the safety of a child using the website, or the security or integrity of the website</li> <li>• Enable them to take precautions against liability.</li> </ul>
Facebook	Yes, but there is no link to additional info.	<p>Facebook may access, preserve and share users information in response to a legal request (like a search warrant, court order or subpoena) if:</p> <ul style="list-style-type: none"> <li>• They have a good faith belief that the law requires them to do so.</li> <li>• It is necessary to detect, prevent and address fraud and other illegal activity</li> </ul>

Social Network	Findings	Notes
		<ul style="list-style-type: none"> <li>To protect Facebook, users and others, including as part of investigations</li> <li>To prevent death or imminent bodily harm.</li> </ul>
Flickr (Yahoo)	Yes, but there is no link to additional info.	Yahoo! “responds to disclosure demands if permitted or required by law including responding to warrants, subpoenas, court orders, or other legal process, or to establish or exercise our legal rights or defend against legal claims.”
Foursquare	Yes, but there is no link to additional info.	May release PII when they believe in good faith that release is necessary to comply with the law, including laws outside user’s country of residence.
Google +	See: Blogger (Google)	
Instagram	Yes, but there is no link to additional info.	Instagram discloses potentially PII and PII when required to do by law.
LinkedIn	Yes, but there is no link to additional info.	<p>It is possible that LinkedIn may need to disclose personal information, profile information and/or information about user’s activities when required by subpoena or other legal process, or if LinkedIn has a good faith belief that disclosure is necessary to:</p> <ul style="list-style-type: none"> <li>Investigate, prevent or take acting regarding suspected or actual illegal activities or to assist government enforcement agencies</li> <li>Investigate and defend LinkedIn against any third party claims or allegations, or to protect the security or integrity of the site</li> <li>To exercise or protect the rights, property or personal safety of LinkedIn, users, employees, or others.</li> </ul>
LiveJournal	Yes, but there is no link to additional info.	LiveJournal may share PI with US Law enforcement officers to “investigate, prevent, or take action to prevent or stop illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of LiveJournal’s TOS, and/or if it is necessary to comply with, and/or cure a potential violation or breach of, U.S. law.”
Meetup	Yes, but there is no link to additional info.	May disclose PII to comply with a current juridical proceeding, a court order or legal

Social Network	Findings	Notes
		process served on the website.  “You authorize us to disclose any information about you to law enforcement or other government officials as we, in our sole discretion, believe necessary or appropriate, in connection with an investigation of fraud, intellectual property infringements, or other activity that is illegal or may expose us or you to legal liability.”
MySpace	Vague note.	Myspace may access or disclose PII to comply with the law or legal process.
Nexopia	Yes, but there is no link to additional info.	Nexopia “will fully cooperate with any request to release information to any law enforcement agency when a proper request is received.” (Including subpoena, and search warrants).
Ping (Apple)	Yes, but there is no link to additional info.	“It may be necessary – by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence – for Apple to disclose your personal information. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.”
Pinterest	Yes, but there is no link to additional info.	Pinterest can disclose any information about users to government or law enforcement officials, in their sole discretion, if they believe it necessary or appropriate to respond to claims and legal process including, but not limited to, subpoenas, to protect the property and rights of Interest or a third party, to protect the safety of the public or any person, or to prevent or stop activity they consider to be, or to pose a risk of being, illegal, unethical or legally actionable activity.
Plenty of Fish	Yes, but there is no link to additional info.	May disclose information as permitted or required by law.  May be compelled to release information by a court of law or other person or entity with jurisdiction to compel production of such

Social Network	Findings	Notes
		<p>information.</p> <p>If PoF has reasonable grounds to believe information could be useful in the investigation of improper or unlawful activity, they may disclose information to law enforcement agencies or other appropriate bodies.</p>
Reddit	Yes, but there is no link to additional info.	Reddit may provide access to their database in order to cooperate with official investigations or legal proceedings, including, for example, in response to subpoenas, search warrants, court orders, or other legal process.
Tumblr	Yes, but there is no link to additional info.	Tumblr reserves the right to access, preserve, and disclose any information as they reasonably believe is necessary, in their sole discretion, to satisfy any law, regulation, legal process, governmental request, or governmental order.
Twitter	Yes, but there is no link to additional info.	<p>Twitter may preserve or disclose user information if they believe that it is necessary to comply with a law, regulation or legal request.</p> <p>Nothing in Twitter’s Privacy Policy is intended to limit any legal defenses or objections user may have to a third party’s, including a government’s, request to disclose their information.</p>
Wikimedia Foundation	Yes, but there is no link to additional info.	<p>“Occasionally, the Foundation may receive a subpoena or other compulsory request from a law-enforcement agency or a court or equivalent government body that requests the disclosure of information about a registered user, and may be compelled by law to comply with the request.”</p> <p>“In the event of such a legally compulsory request, the Foundation will attempt to notify the affected user within three business days after the arrival of such subpoena by sending a notice by email to the email address (if any) that the affected user has listed in his or her user preferences.”</p>

Social Network	Findings	Notes
		“The Foundation does note... that such users may have the legal right to resist or limit that information in court by filing a motion to quash the subpoena.... If the Foundation receives a court-filed motion to quash or otherwise limit the subpoena as a result of action by a user or their lawyer, the Foundation will not disclose the requested information until Wikimedia receives an order from the court to do so.”
WordPress.com	Yes, but there is no link to additional info.	Automatic discloses potentially PII and PII in response to a subpoena, court order or other governmental request.
WordPress.org	Yes, but there is no link to additional info.	WordPress.org discloses potentially PII and PII when required to do so by law.
World of Warcraft	Yes, but there is no link to additional info.	Blizzard reserves the right to disclose PI as required by law, and if they have a good faith belief that it is necessary to prevent fraud or other illegal activities.
YouTube (Google)	See: Blogger (Google)	
Zynga	Yes, but there is no link to additional info.	Zynga may disclose user’s information when they have a good faith belief that they are required to disclose the information in response to legal process (e.g. court order, search warrant or subpoena); to satisfy any applicable laws or regulations; or when they believe that the Service is being used in the commission of a crime, including to report such criminal activity or to exchange information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

## 5. SECURITY OF PII

### a) Are commitments made to security of PII?

Social Network	Findings	Notes
Blogger (Google)	Yes	Google: encrypts many of their services using SSL; offers a two step verification when accessing Google Account, and a Safe Browsing feature in Google Chrome; and restricts access to PII to Google employees, contractors and agents, and subject them to strict contractual confidentiality obligations.
Club Penguin	Yes	<p>“Appropriate physical, electronic, and managerial procedures to safeguard and help prevent unauthorized access, maintain data security, and correctly use the information we collect online” have been put in place. Sensitive information is encrypted using SSL technology.</p> <p>Financial information stored by payments processing vendor is safeguarded with appropriate security.</p>
Facebook	Yes/No	“We do our best to keep your information secure, but we need your help... We try to keep Facebook up, bug-free and safe, but can’t make guarantees about any part of our services or products.”
Flickr (Yahoo)	Yes	<p>They limit access to PI to employees who they believe reasonably need to come into contact with that info.</p> <p>They have physical, electronic, and procedural safeguards that comply with their legal obligations to protect PI.</p> <p>Additional link to ‘Security at Yahoo!’ is provided.</p>
Foursquare	Yes/No	“Foursquare endeavors to safeguard user information to ensure that user account information is kept private. However, foursquare cannot guarantee the security of user account information. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.”
Google +	See: Blogger (Google)	
Instagram	Yes	Instagram takes all measures reasonably necessary to protect against the unauthorized access, user, alteration

Social Network	Findings	Notes
		or destruction of potentially PII and PII.
LinkedIn	Yes/No	<p>Personal information is password-protected and sensitive data is protected by SSL encryption.</p> <p>LinkedIn regularly audits its system for possible vulnerabilities and attacks, and use a tier-one secured-access data center.</p> <p>However, there is no guarantee that information may not be accessed, disclosed, altered, or destroyed by breach of any of their physical, technical, or managerial safeguards.</p>
LiveJournal	Yes	<p>Whenever you post content anywhere on the Service, LiveJournal makes reasonable efforts to ensure user's privacy in the following manner:</p> <ul style="list-style-type: none"> <li>• Safeguards: physical, electronic, and procedural safeguards are used to protect PI.</li> <li>• Encryption: In certain areas SSL encryption is used to protect data transmissions.</li> </ul>
Meetup	No	
MySpace	Yes	Myspace uses commercially reasonable administrative, technical, personnel and physical measures to safeguard PII and credit card information in its possession against loss, theft and unauthorized use, disclosure or modification.
Nexopia	Yes/No	<p>Uses physical and electronic precautions to protect member PI.</p> <p>Cannot guarantee the absolute security of PI due to actions of other members with whom you share information, and factors such as unauthorized third party entry or use, or hardware or software failure.</p>
Ping (Apple)	Yes	Apple takes precautions – including administrative, technical, and physical measures – to safeguard personal information against loss, theft, and misuse, as well as against unauthorized access, disclosure, alteration, and destruction.
Pinterest	Yes/No	<p>Pinterest uses commercially reasonable safeguards to preserve the integrity and security of information collected and maintained through the Service.</p> <p>However, they cannot ensure or warrant the security of</p>

Social Network	Findings	Notes
		any information provided to them or guarantee that information on the Service may not be accessed, disclosed, altered, or destroyed by unauthorized persons.
Plenty of Fish	Yes	Maintain appropriate safeguards and current security standards to protect PI, whether recorded on paper or captured electronically, against unauthorized access, disclosure, or misuse.  Electronic records are stored in secure, limited-access servers; technological tools like firewalls and passwords are employed; reasonably secure methods are used whenever PI is destroyed.
Reddit	No	“Because no data transmission over the Internet is completely secure, and no system of physical or electronic security is impenetrable, Service Provider can not guarantee the security of the information you send to us or the security of our servers or databases, and by using the Website you agree to assume all risk in connection with the information sent to us or collected by us when you use the Website.”
Tumblr	Yes/No	“We seek to protect your information (including Account information) to ensure that it is kept private; however, we can’t guarantee the security of any information. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.”
Twitter	No	
Wikimedia Foundation	Yes/No	“This Privacy Policy, together with other policies, resolutions, and actions by the Foundation, represents a committed effort to safeguard the security of the limited user information that is collected and retained on our servers.”  “Nevertheless, the Foundation cannot guarantee that user information will remain private.”
WordPress.com	Yes	Automattic takes all measures reasonably necessary to protect against the unauthorized access, user, alteration or destruction of potentially PII and PII.
WordPress.org	Yes	WordPress.org takes all measures reasonably necessary to protect against the unauthorized access, use, alteration, or destruction of potentially PII and PII.
World of Warcraft	Yes	Blizzard takes steps to assure that all information

Social Network	Findings	Notes
		<p>collected will remain secure and in its original form. Access to all PI is controlled, SSL encryption used when credit card information is transmitted.</p> <p>Blizzard will take reasonable steps to assure that third parties to whom they transfer any data will provide sufficient protection of PI.</p>
YouTube (Google)	See: Blogger (Google)	
Zynga	Yes/No	<p>Zynga implements reasonable security measures to protect the security of users information both online and offline, and they are committed to the protection of customer information.</p> <p>Zynga cannot guarantee that unauthorized access, hacking, data loss, or other breaches will never occur.</p>

**b) Are commitments made about encryption/de-identification of data?**

Social Network	Findings	Notes
Blogger (Google)	Yes	Google encrypts many of their services using SSL.
Club Penguin	Yes	Sensitive information is encrypted using SSL technology.
Facebook	Yes	Facebook only provides data to advertising partners or customers after they have removed user's name or any other personally identifying information from it, or have combined it with other people's data in a way that is no longer associated with user.
Flickr (Yahoo)	Yes	Link to 'Security at Yahoo!' states that: SSL encryption is used for certain information. Data Storage and Anonymization pages states that: Yahoo! uses a multi-step process to de-identify/anonymize search log data and IP addresses. But, Yahoo! stores this data in an identifiable form for up to 18 months. Yahoo! provides anonymous reporting for internal and external clients.
Foursquare	Yes	"Google Analytics uses cookies to collect and store anonymous information" Non-PII is used in aggregate form.
Google +	See: Blogger (Google)	
Instagram	No	
LinkedIn	Yes	Sensitive information is encrypted by SSL. Professional plugin impression data is de-identified after 12 months.
LiveJournal	Yes	In certain areas, LiveJournal uses industry-standard SSL-encryption to protect data transmissions.
Meetup	Yes	Meetup shares only aggregated or otherwise Non-PII to partners and advertisers.
MySpace	No	
Nexopia	No	
Ping (Apple)	Yes	Apple online services use SSL encryption. Location data is collected anonymously.
Pinterest	No	
Plenty of Fish	Yes	SSL encryption with a 2048 bit RSA key digital certificate is used.

Social Network	Findings	Notes
Reddit	No	Mentions using aggregated, anonymous data.
Tumblr	No	
Twitter	No	
Wikimedia Foundation	No	Mentions using aggregated data.
WordPress.com	No	Mentions using non-PII in aggregate form.
WordPress.org	No	Mentions using non-PII in the aggregate.
World of Warcraft	Yes	SSL encryption used when credit card information is transmitted.
YouTube (Google)	See: Blogger (Google)	
Zynga	Yes	The transmission of payment information is encrypted using SSL technology.

**c) Is there a note that users and/or government bodies will be alerted if a data breach occurs?**

Social Network	Findings
Blogger (Google)	No
Club Penguin	No
Facebook	No
Flickr (Yahoo)	No
Foursquare	No
Google +	<i>See: Blogger (Google)</i>
Instagram	No
LinkedIn	No
LiveJournal	Yes; If LiveJournal learns of a security systems breach, they may attempt to notify users electronically so that users can take appropriate protective steps. They may also post to the LiveJournal News and/or Support pages.
Meetup	No
MySpace	No
Nexopia	No
Ping (Apple)	No
Pinterest	Yes; Pinterest will make any legally required disclosures of any breach of the security, confidentiality, or integrity of stored “personal data” to users via email or conspicuous posting on the Service.
Plenty of Fish	No
Reddit	Yes; Reddit “may seek to notify you” in the unlikely event of compromised security of your information. If notification is appropriate, they may notify you by email.
Tumblr	No
Twitter	No
Wikimedia Foundation	No
WordPress.com	No
WordPress.org	No
World of Warcraft	No
YouTube (Google)	<i>See: Blogger (Google)</i>
Zynga	No

## 6. ACCESS AND CORRECTION RIGHTS

### a) Are commitments made to allow access to PII and non-PII?

Social Network	Findings	Notes
Blogger (Google)	Yes	User can review and control information through Google Dashboard and the Data Liberation Front. Google states: “Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort.”
Club Penguin	Yes to PII, no commitment made to allow access to non-PII.	Parents, users, and users under the age of 18 with parental/guardian permission can request access to PII.
Facebook	Yes	User can access most of their personal data stored by Facebook by logging into their account and viewing their timeline and activity log. User can also download a copy of their Facebook data in an expanded archive through a link that is provided.
Flickr (Yahoo)	No	Only mentions: “you can edit our Yahoo! Account Information... at any time.”
Foursquare	Yes to PII, no commitment made to allow access to non-PII.	User can access this information by visiting “user settings page” and “History” tab. Password, Phone number, email address, other user profile information (e.g. home city, photo), and usage information (e.g. check-in history)
Google +	See: Blogger (Google)	
Instagram	No	
LinkedIn	Yes to PII, no commitment made to allow access to non-PII.	Users can review the personal information provided to LinkedIn and make any desired changes to the information they’ve publish at any time by logging into their account.
LiveJournal	No	
Meetup	Yes to PII, no commitment made to allow access to non-PII.	After registration for Platform and for specific topic groups, Meetup Groups or Meetup Everywheres, Meetup provides a way to update PII.
MySpace	Yes to PII, no commitment made to allow access to non-PII.	Members can view and change registration PII, member preferences and profile information by logging into account and accessing features such as ‘edit profile’ and ‘account settings.’
Nexopia	Yes to PII, no	“Nexopia permits requests for access to and review

Social Network	Findings	Notes
	commitment made to allow access to non-PII.	of Personal Information collected by Nexopia about an individual by the individual concerned.”
Ping (Apple)	Yes to PII, no commitment made to allow access to non-PII.	Apple makes good faith efforts to provide users access to personal information.
Pinterest	Yes to PII, no commitment made to allow access to non-PII.	All users may review, update, correct or delete the PI in their user account by contacting Pinterest or by editing their profile via the Service.
Plenty of Fish	Yes to PII, no commitment made to allow access to non-PII.	<p>“Applicable Privacy Laws allow any individual the right to access and/or request the correction of errors or omissions in his or her personal information that is in our custody or under our control.”</p> <p>For security purposes, not all PI is accessible and amendable by the Privacy Officer.</p>
Reddit	No	
Tumblr	Yes to PII, no commitment made to allow access to non-PII.	<p>Registered users can access and delete most information associated with their account by logging into the services and checking account settings page.</p> <p>California residents can request a copy of PI that is shared with affiliates and/or third parties.</p>
Twitter	Yes to PII, no commitment made to allow access to non-PII.	Registered users are provided with tools and account settings to access or modify the PI they provided to Twitter and associated with their account.
Wikimedia Foundation	No	
WordPress.com	No	
WordPress.org	No	
World of Warcraft	Yes*	California Residents have the right, under Californian law, to request certain information regarding the disclosure of PI to third parties.
YouTube (Google)	See: Blogger (Google)	
Zynga	Yes to PII, no commitment made to allow access to non-PII.	“Users in certain jurisdictions have a right to access personal information held about themselves. Your right of access can be exercised in accordance with applicable law.”

**b) Are commitments made to allow correction of PII and non-PII?**

Social Network	Findings	Notes
Blogger (Google)	Yes to PII, no commitment made to allow correction to non-PII.	Google states, "...we aim to provide you access to your personal information. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes."
Club Penguin	Yes to PII, no commitment made to allow correction to non-PII.	Parents, users, and users under the age of 18 with parental/guardian permission can request to have factual errors corrected PII.
Facebook	Yes to PII, no commitment made to allow correction to non-PII.	User can correct most of their personal data stored by Facebook by logging into their account and viewing their timeline and activity log.
Flickr (Yahoo)	No	Only mentions: "you can edit our Yahoo! Account Information... at any time."
Foursquare	Yes to PII, no commitment made to allow correction to non-PII.	User can update and ensure accuracy of information through "user settings page."
Google +	See: Blogger (Google)	
Instagram	No	
LinkedIn	Yes to PII, no commitment made to allow correction to non-PII.	Users can review the personal information provided to LinkedIn and make any desired changes to the information they've publish at any time by logging into their account.
LiveJournal	Yes to PII, no commitment made to allow correction to non-PII.	Users can edit their LiveJournal Account Information at any time.
Meetup	Yes to PII, no commitment made to allow correction to non-PII.	After registration for Platform and for specific topic groups, Meetup Groups or Meetup Everywheres, Meetup provides a way to update PII.
MySpace	Yes to PII, no commitment made to allow correction to non-PII.	Myspace will take reasonable steps to correct any PII a Member informs them is incorrect.

Nexopia	Yes to PII, no commitment made to allow correction to non-PII.	Nexopia reserves the right not to change any Personal Information but may amend any alternative text the individual concerned believes appropriate.
Ping (Apple)	Yes to PII, no commitment made to allow correction to non-PII.	Apple makes good faith efforts to provide users access to personal information so that users can request that Apple correct the data if it is inaccurate.
Pinterest	Yes to PII, no commitment made to allow correction to non-PII.	All users may review, update, correct or delete the PI in their user account by contacting Pinterest or by editing their profile via the Service.
Plenty of Fish	Yes to PII, no commitment made to allow correction to non-PII.	“Applicable Privacy Laws allow any individual the right to access and/or request the correction of errors or omissions in his or her personal information that is in our custody or under our control.”
Reddit	No	
Tumblr	Yes to PII, no commitment made to allow correction to non-PII.	Registered users can access and delete most information associated with their account by logging into the services and checking account settings page.
Twitter	Yes to PII, no commitment made to allow correction to non-PII.	Registered users are provided with tools and account settings to access or modify the PI they provided to Twitter and associated with their account.
Wikimedia Foundation	No	
WordPress.com	No*	Those with questions about deleting or correcting their personal data can contact the ‘support team’ through link provided.
WordPress.org	No	
World of Warcraft	Yes to PII, no commitment made to allow correction to non-PII.	If users would like to correct or request the deletion of PI, they are instructed to contact Privacy Policy Administrator at mailing address or email provided. Requests will be responded to within 30 days.
YouTube (Google)	See: Blogger (Google)	
Zynga	Yes	If users wish to review or change the information Zynga has about them, they are instructed to email Zynga at address provided.

**c) Are procedures for access and correction specified?**

Social Network	Findings	Notes
Blogger (Google)	Procedures are not explicit.	Implicitly states that users can contact Google for access and correction.  User can review and control information through Google Dashboard and the Data Liberation Front.
Club Penguin	Yes	See: 2. e)
Facebook	Yes	User must log on and view timeline and activity log.  User can also download a copy of their Facebook data in an expanded archive through 'Account Settings.'
Flickr (Yahoo)	Yes	Link to "Yahoo! Account Information" provided.
Foursquare	Yes	User must visit "user settings page."
Google +	See: Blogger (Google)	
Instagram	No	
LinkedIn	Procedures are not explicit.	User can access and make correction to PI by logging into their account.
LiveJournal	No	
Meetup	No	
MySpace	Yes	See 6. a)
Nexopia	Yes	Requests are to be sent to email provided, Nexopia will endeavor to provide the information in no later than 30 days.  Nexopia also outlines detailed list of reasons why they would decline access to PII.
Ping (Apple)	Yes	Access, correction, or deletion requests can be made through the regional Privacy Contact Form.  Apple may decline to process requests that are unreasonably repetitive, require disproportionate technical effort, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law.
Pinterest	Yes	By contacting Pinterest or by editing their profile via the Service.
Plenty of Fish	Yes	Privacy Officer will assist the individual with the access request.

Social Network	Findings	Notes
		“We will respond to requests within the time allowed by Applicable Privacy Laws and will make every effort to respond as accurately and completely as possible. Any corrections made to personal information will be promptly sent to any organization it was disclosed to.”
Reddit	No	
Tumblr	Yes	Users can log into the Services and their account settings page. California residents can submit a written request for access to an address provided.
Twitter	Yes	Link to ‘account settings’ provided.
Wikimedia Foundation	N/A	
WordPress.com	Yes/No	Link to support team is provided.
WordPress.org	N/A	
World of Warcraft	Yes	By contacting Privacy Policy Administrator at mailing address or email provided.
YouTube (Google)	See: Blogger (Google)	
Zynga	Yes	Instructed to email Zynga at address provided.

## References

Privacy Policies and Terms of Service documents were all collected from companies' public websites, as accessed from a Canadian IP address, in the months of June-July 2012.

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