

Short Summaries of Social Networking Service Privacy Policies

January 19, 2013 :: Version 1.1

Contents

About the CATSMI Project	2
Overview of Short Summaries of Social Networking Service Privacy Policies	4
Cite As.....	4
Privacy Policy.....	5
Can you access the privacy policy from the home page? Is the policy all in one place or in different parts of the website?	5
Is the privacy policy just for that site or is it part of a larger organization?.....	7
Does the privacy policy mention national or international privacy laws?	9
Does the privacy policy involve self-regulation or a seal of approval?	11
Is there a specific nation or court that legal proceedings must go through?	13
Can you find out when the privacy policy was last updated? Can you see older versions?	15
Can the site change its privacy policy without telling you?.....	17
Procedures	20
If you're a child, can you sign up with adult consent?	20
How can you complain? Is there a specific privacy officer listed?	22
Can you permanently delete information that you previously provided?	25
Collection, Use and Disclosure of PII	30
What counts as personally identifiable information (PII) that the site collects?	30
Does the PII collected change depending on if you're an adult or a child?	37
Who is your Personally Identifiable Information (PII) disclosed to?	39
Will your Personally Identifiable Information (PII) possibly be disclosed to law enforcement agencies? If so, why?	50
Can you opt out of disclosing your Personally Identifiable Information (PII)? ..	55
Security.....	58
Does the site make commitments to keeping your personally identifiable information (PII) secure?.....	58
If there's a breach of information on the site, will they let you know?	62
Access and Correction Options	64
Can you correct or update your Personally Identifiable Information (PII) if you want to? Does the site tell you how to do this?	64
References	67
About the Authors	68
Legal Information.....	69

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 Short 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 analysed 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. 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 January 19, 2013.

Cite As

Michael Smith and Christopher Parsons. (2013). "Short Summaries of Social Networking Service Privacy Policies," *The CATSMI Project*. Published January 19, 2013. Available at: <http://catsmi.ca/resources/public-resources>.

Privacy Policy

Can you access the privacy policy from the home page? Is the policy all in one place or in different parts of the website?

Social Network	Findings	Notes
Blogger (Google)	Yes	The privacy policy is all in one place, but there are links to additional information.
Club Penguin	Yes	The privacy policy is all in one place.
Facebook	Yes	The privacy policy is mostly unified but it has links to other information. Also, privacy for minors is at a different place on the site.
Flickr (Yahoo)	Yes	The policy 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.
Foursquare	Yes	The policy is in one place.
Google +	Yes	The privacy policy is all in one place, but there are links to additional information.
Instagram	Yes	The policy is in one place.
LinkedIn	Yes	The policy is all in one place, but there are links to additional information.
LiveJournal	Yes	The policy is in one place.
Meetup	Yes	The policy is in one place.
MySpace	Yes	The policy is in one place..
Nexopia	Yes	The policy is in one place.
Ping (Apple)	Yes	The policy is in one place.
Pinterest	Yes	The policy is all in one place, with links provided for the privacy policy, terms, and acceptable use policies.
Plenty of Fish	Sort of	There's a link entitled 'Terms', which goes to a page where they can find 'PLENTYOFFISH PRIVACY

Social Network	Findings	Notes
		POLICY' after scrolling down past 'PLENTYOFFISH TERMS OF USE AGREEMENT.'
Reddit	Yes	The policy is in one place.
Tumblr	Yes	The policy is in one place.
Twitter	Yes	The policy is in one place.
Wikimedia Foundation	Yes	The policy is in one place.
WordPress.com	Yes	The policy is in one place.
WordPress.org	Yes	The policy is in one place.
World of Warcraft	Yes	All in one place.
YouTube (Google)	Yes	All in one place.
Zynga	Yes	All in one place.

Is the privacy policy just for that site or is it part of a larger organization?

Social Network	Findings
Blogger (Google)	Part of all Google services.
Club Penguin	Just for their site.
Facebook	Just for their site.
Flickr (Yahoo)	It's common to all Yahoo! products and services.
Foursquare	Just for their site.
Google +	Part of all Google services.
Instagram	Just for their site.
LinkedIn	Just for their site.
LiveJournal	Just for their site.
Meetup	Just for their site.
MySpace	Just for their site.
Nexopia	Just for their site.
Ping (Apple)	Common to all Apple products and services.
Pinterest	Just for their site.
Plenty of Fish	Just for their site.
Reddit	Unique to SNS/ Subsidiary of Condé Nast Digital, a subsidiary of Advance Publications.
Tumblr	Just for their site.
Twitter	Just for their site.
Wikimedia Foundation	Common to all Wikimedia products.
WordPress.com	Common to Automattic Inc.'s websites, which include: automatic.com, wordpress.com, gravatar.com, intensedebate.com, and akismet.com.

Social Network	Findings
	The Privacy Policy is available under a Creative Commons Sharealike license, which means anyone can repurpose it.
WordPress.org	Just for their site.
World of Warcraft	Common to all Blizzard Entertainment and affiliate companies' websites.
YouTube (Google)	Common to all services offered by Google and its affiliates.
Zynga	Unique to Zynga Inc. 'social game services.'

Does the privacy policy mention national or international privacy laws?

Social Network	Findings	Notes
Blogger (Google)	Yes	It mentions US-EU Safe Harbor Framework, US-Swiss Safe Harbor Framework, UK Internet Advertising Bureau.
Club Penguin	Yes	It mentions US Children’s Online Privacy Protection Act, EU Data protection legislation, Canadian federal and provincial privacy legislation.
Facebook	Yes	It mentions US-EU and US-Swiss Safe Harbour Frameworks, California law.
Flickr (Yahoo)	No	
Foursquare	Yes	It mentions US federal and state courts for international users.
Google +	Yes	It mentions US-EU Safe Harbor Framework, US-Swiss Safe Harbor Framework, UK Internet Advertising Bureau.
Instagram	No	
LinkedIn	Yes	It mentions EU Safe Harbour Privacy Framework.
LiveJournal	Yes	It mentions compliance 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	No	
Nexopia	No	
Ping (Apple)	Yes	It mentions abiding 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.

Social Network	Findings	Notes
Pinterest	No	
Plenty of Fish	No	
Reddit	No	
Tumblr	Yes	It mentions California Civil Code sections 1798.83-1798.84 (California residents are entitled to ask for a notice identifying the categories of personal customer information that is shared with affiliates and/or third parties).
Twitter	Yes	It mentions compliance 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	
WordPress.org	No	
World of Warcraft	Yes	It mentions compliance 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.
YouTube (Google)	Yes	It mentions US-EU Safe Harbor Framework, US-Swiss Safe Harbor Framework, UK Internet Advertising Bureau.
Zynga	Yes	It mentions Compliance 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.

Does the privacy policy involve self-regulation or a seal of approval?

Social Network	Findings	Notes
Blogger (Google)	Yes	It mentions UK Internet Advertising Bureau Good Practice Principles for Online Behavioural Advertising, Australian Best Practice Guideline for Online Behavioural Advertising, IAB. Europe's European Framework for Online Behavioural Advertising, Member of Network Advertising Initiative.
Club Penguin	Yes	It mentions TRUSTe Children's Online Privacy Seal Program.
Facebook	Yes	It mentions TRUSTe EU Safe Harbour.
Flickr (Yahoo)	No	
Foursquare	No	
Google +	Yes	It mentions the UK Internet Advertising Bureau Good Practice Principles for Online Behavioural Advertising, Australian Best Practice Guideline for Online Behavioural Advertising, IAB Europe's European Framework for Online Behavioural Advertising, and being a Member of Network Advertising Initiative.
Instagram	No	
LinkedIn	Yes	It is self-certified as consistent with US-EU Safe Harbour principles; member of Council of American Survey Research Organizations; TRUSTe's Privacy Seal.
LiveJournal	No	
Meetup	No	
MySpace	No	
Nexopia	No	
Ping (Apple)	Yes	It mentions TRUSTe's Privacy Seal.
Pinterest	No	
Plenty of Fish	No	

Social Network	Findings	Notes
Reddit	No	
Tumblr	No	
Twitter	No	
Wikimedia Foundation	No	
WordPress.com	No	
WordPress.org	No	
World of Warcraft	Yes	It self-certifies that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. TRUSTe's Privacy Seal.
YouTube (Google)	No	
Zynga	Yes	It self-certifies that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. TRUSTe's Privacy Seal.

Is there a specific nation or court that legal proceedings must go through?

Social Network	Findings	Notes
Blogger (Google)	No	
Club Penguin	No	
Facebook	No	
Flickr (Yahoo)	No	
Foursquare	Yes	United States
Google +	No	
Instagram	No	
LinkedIn	No	
LiveJournal	No	
Meetup	No	
MySpace	No	
Nexopia	No	
Ping (Apple)	No	
Pinterest	No	
Plenty of Fish	No	
Reddit	No	
Tumblr	No	
Twitter	No	
Wikimedia Foundation	No	
WordPress.com	No	
WordPress.org	No	
World of Warcraft	No	

Social Network	Findings	Notes
YouTube (Google)	No	
Zynga	No	

Can you find out when the privacy policy was last updated? Can you see older versions?

Social Network	Findings	Notes
Blogger (Google)	Yes: July 27, 2012	Older versions are available, and a comparison of policies is available each time it's updated.
Club Penguin	Yes: January 11, 2012	There isn't a link to previous versions.
Facebook	Yes: December 11, 2012	No link to previous versions.
Flickr (Yahoo)	Yes: July 12, 2010	There isn't a link to previous versions.
Foursquare	Yes: July 13, 2012	No link to previous versions. Updated policy isn't effective until January 28, 2013.
Google +	Yes: July 27, 2012	Older versions are available, and a comparison of policies is available each time it's updated.
Instagram	Yes: January 19, 2013	Prior privacy policies are also available through a link.
LinkedIn	Yes: June 16, 2011	A link is provided to a summary of changes made to the policy.
LiveJournal	Yes: December 12, 2010	No link to previous versions.
Meetup	Yes: May 23, 2010	There isn't a link to previous versions.
MySpace	Yes: December 17, 2012	No link to previous versions.
Nexopia	Yes: November 2, 2009	There isn't a link to previous versions.
Ping (Apple)	Yes: May 21, 2012	No link to previous versions.

Social Network	Findings	Notes
Pinterest	Yes: November 8, 2012	A link is provided to previous privacy policy.
Plenty of Fish	No	
Reddit	Yes: April 10, 2012	No link to previous versions is provided.
Tumblr	Yes: March 22, 2012	Link to prior versions of the policy provided. Versions are stored on GitHub, which lets you compare different versions and see what has changed.
Twitter	Yes: May 17, 2012	Link to archive of previous privacy policies provided.
Wikimedia Foundation	Yes: October 2008	Link to 'discussion archive' of privacy policy changes is provided.
WordPress.com	Yes: February 1, 2011	No link to previous versions, but there is a log of changes dating back to 2009 is provided.
WordPress.org	No	No link to previous versions.
World of Warcraft	Yes: March 25, 2011	No link to previous versions.
YouTube (Google)	Yes: July 27, 2012	Older versions are available, and a comparison of policies is available each time it's updated.
Zynga	Yes: September 30, 2011	No link to previous versions.

Can the site change its privacy policy without telling you?

Social Network	Findings	Notes
Blogger (Google)	No	Google will notify you before any change if the changes are “significant.”
Club Penguin	No	Your personal information isn’t used differently without providing notification and obtaining consent.
Facebook	No	Notice of changes to Data Use Policy will be published on the page and on the Facebook Site Governance Page. Further, prominent notice will be made if changes are material.
Flickr (Yahoo)	No	Yahoo! may update their privacy policy. Users will be notified about significant changes in how the company treats personal information by email or by a prominent notice on their site.
Foursquare	No	“Material” changes to the policy are announced on the site or sent to your email.
Google +	No	Google will notify you before any change if the changes are “significant.”
Instagram	Yes	“Instagram may modify or update this Privacy Policy from time to time, so please review it periodically. We may provide you additional forms of notice of modifications or updates as appropriate under the circumstances. Your continued use of Instagram or the Service after any modification to this Privacy Policy will constitute your acceptance of such modification.”
LinkedIn	No	If there are significant changes in the way they treat personal information, or in the Privacy Policy document itself, a notice will be displayed on the LinkedIn website or an email will be sent out.
LiveJournal	Yes	The Policy may be updated or amended at any time. The revised policy will be posted on Privacy Policy page for you to review.
Meetup	No	If Policy is changed, the changes are posted on http://www.meetup.com/privacy , on the Meetup

Social Network	Findings	Notes
		homepage, or other places deemed appropriate. If Meetup makes material changes, a prominent notice for members and others will occur, in some cases the company will also email members.
MySpace	No	Updated policies are posted to the site.
Nexopia	No	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.”
Ping (Apple)	No	
Pinterest	No	Any changes are advertised on the site.
Plenty of Fish	No info provided	
Reddit	Yes.	Continued access of the Website will constitute acceptance of any changes or revisions to the Privacy Policy. If you cannot agree with the terms and conditions of the Privacy Policy, do not use the Website.
Tumblr	No	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).
Twitter	No	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.
Wikimedia Foundation	No	
WordPress.com	Sort of	Automattic may change its Privacy Policy from time to time, and in Automattic’s sole discretion. Encourages visitors to frequently check Privacy

Social Network	Findings	Notes
		Policy for any changes, and encourages users to check their blog's dashboard for alerts to these changes.
WordPress.org	Yes	May change Privacy Policy from time to time, and in their sole discretion. Encourages visitors to frequently check Privacy Policy page for any changes.
World of Warcraft	No	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.
YouTube (Google)	No	Google will notify you before any change if the changes are "significant."
Zynga	No	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.

Procedures

If you're a child, can you sign up with adult consent?

Social Network	Findings	Notes
Blogger (Google)	N/A	
Club Penguin	Yes	A parent's email is required and parents are notified of activities on the site.
Facebook	Yes	
Flickr (Yahoo)	No information available	
Foursquare	No	The service isn't available to anyone under 13.
Google +	N/A	
Instagram	No	The service isn't available to anyone under 13.
LinkedIn	No	Anyone under 19 isn't eligible for LinkedIn.
LiveJournal	No	The service isn't available to anyone under 13.
Meetup	No	Users must be at least 18.
MySpace	No	The service isn't available to anyone under 13.
Nexopia	Yes	For persons between the ages of 13 and 18, Nexopia requires parental or guardian consent prior to opening an account.
Ping (Apple)	No information available	
Pinterest	No	The service isn't available to anyone under 13.
Plenty of Fish	No	Users must be at least 18.
Reddit	No	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,

Social Network	Findings	Notes
		however, does not ask for birthday when registering.)
Tumblr	No	The service isn't available to anyone under 13.
Twitter	No	The service isn't available to anyone under 13.
Wikimedia Foundation	Yes	Registration is not necessary to contribute to a Project.
WordPress.com	No info provided	
WordPress.org	No info provided	
World of Warcraft	No	Implicitly states that child must be at least 12 years old to use service.
YouTube (Google)	N/A	
Zynga	No	Zynga websites and games are not intended for children under the age of 13.

How can you complain? Is there a specific privacy officer listed?

Social Network	Findings	Notes
Blogger (Google)	Company provides a complaints process but no officer listed.	When Google receives “formal written complaints, we will contact the person who made the complaint to follow up.”
Club Penguin	Contact TRUSTe if a question is answered satisfactorily.	No privacy officer is listed but a contact email and address are provided.
Facebook	Users are asked to contact Facebook by mail or an online form.	No privacy officer listed.
Flickr (Yahoo)	Company has specified an inquiry/complaints process specified.	The Privacy Officer can be contacted through feedback form or through mailing address provided.
Foursquare	Not specified.	Questions or concerns can be emailed to a generic privacy email address
Google +	Company outlines a complaints process but no officer listed.	When Google receives “formal written complaints, we will contact the person who made the complaint to follow up.”
Instagram	Not specified.	Individuals can contact support staff with any questions. No privacy officer is listed.
LinkedIn	LinkedIn has an inquiry/complaints process.	An online form provided at “help centre” but no privacy officer is listed.
LiveJournal	The company possesses an Inquiry/complaints process.	European Union citizens can contact LiveJournal through the provided mailing address. All subscribers 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. The company does not list a privacy officer.
Meetup	Meetup has an	“Any dispute, claim or controversy arising

Social Network	Findings	Notes
	inquiry/complaints process.	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.” Subscribers can contact Meetup through mailing address or email provided.
MySpace	Not specified.	MySpace contact provided for “communication”.
Nexopia	Nexopia has an inquiry/complaints process.	The Privacy Officer can be contacted through email or mailing address provided.
Ping (Apple)	Apple has an inquiry/complaints process.	“If you have questions or complaints regarding our Privacy Policy or practices, please contact us.” The Privacy Officer can be contacted through email or mailing address provided.
Pinterest	No information provided.	
Plenty of Fish	The company provides an inquiry/complaints process.	Questions/concerns are to be directed to Privacy Officer. If subscriber thinks their copyrighted work has been infringed, detailed instructions about how to submit a complaint to a DMCA Agent at Plentyoffish is provided. Email address and name of the Privacy Officer, Markus Frind, is provided.
Reddit	Reddit has an inquiry/complaints process.	Concerns or questions are to be directed to the Privacy Policy Coordinator via mailing address provided. The Privacy Policy Coordinator’s mailing address provided.
Tumblr	Tumblr has an inquiry/complaints process.	“If you have any questions or concerns regarding privacy using the Services, please send us a detailed message.” Though a mailing address is provided it’s

Social Network	Findings	Notes
		apparently only to be used by California residents.
Twitter	Twitter has an inquiry/complaints process.	An email address and mailing address are provided for those who have questions or comments. No privacy officer is listed.
Wikimedia Foundation	No process specified.	There is a general 'Questions for Wikimedia?'
WordPress.com	Wordpress has an inquiry/complaints process.	A link to general 'complaints page' can be found after clicking on 'contact us link.'
WordPress.org	No process specified.	
World of Warcraft	The company has an inquiry/complaints process.	Subscribers can file a complaint or direct questions to the email or mailing address provided. The Privacy Policy Administrator's email and mailing address provided.
YouTube (Google)	While YouTube/Google provides a complaints process it does not list a privacy officer.	When Google receives "formal written complaints, we will contact the person who made the complaint to follow up."
Zynga	Zynga has an inquiry/complaints process.	Subscribers can send an email or use mailing address provided.

Can you permanently delete information that you previously provided?

Social Network	Findings	Notes
Blogger (Google)	Yes	You can “review and control certain types of information tied to Google Account by using Google Dashboard.” 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.” A link is given to Data Liberation Front (the central location for information on how to move your data in and out of Google products.)
Club Penguin	Yes	You can request to have your information deleted, but it might result in the termination of your account.
Facebook	Yes	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.
Flickr (Yahoo)	Yes	There’s a link to Account Deletion page provided. 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. Flickr Pro accounts cannot be canceled.
Foursquare	Yes	To delete your information you have to delete your entire account. Copies of your information may be kept for up to 90 days.
Google +	Yes	You can “review and control certain types of information tied to Google Account by using Google Dashboard.” 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.” A link is given to Data Liberation Front (the central location for information on how to move your data in

Social Network	Findings	Notes
		and out of Google products.)
Instagram	No	Only by deleting your account, and “following termination or deactivation of your account, Instagram, its Affiliates, or its Service Providers may retain information (including your profile information) and User Content for a commercially reasonable time for backup, archival, and/or audit purposes.”
LinkedIn	Yes	<p>You can request the deletion of your information at any time by contacting LinkedIn customer service. Requests will be responded to within 30 days.</p> <p>You can close your account through the LinkedIn customer service site, which will remove your username and other personally identifiable information from LinkedIn’s publicly viewable database.</p> <p>LinkedIn may retain certain data contributed by you 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 you have shared with others, or that other users have copied, may also remain visible.</p> <p>LinkedIn disclaims any liability in relation to the deletion or retention of information or any obligation not to delete your information.</p>
LiveJournal	Yes	You can edit your LiveJournal Account information at any time. Also, you can delete your account at any time by visiting the Account Deletion page. It may take some time for all of the content to be deleted and purged from servers. 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.
Meetup	Yes	Upon request Meetup will deactivate your account and remove your personal information from active databases as soon as reasonably possible. To make this request, an email contact is provided. Nonetheless, Meetup will retain in their files information that the user may have requested them to remove the data if, in the company’s discretion, retention of the information is necessary to resolve disputes, troubleshoot problems or

Social Network	Findings	Notes
		to enforce the Terms of Service.
MySpace	Not specified	
Nexopia	Yes	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, personal information may continue to reside in Nexopia's systems after deletion. Consequently, you should not expect that your personal information would be completely removed from Nexopia systems in response to an accepted request for deletion.
Ping (Apple)	Yes	You 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	You can "[c]lose your account at any time. When you close your account, we'll deactivate it and remove your pins and boards from Pinterest. We may retain archived copies of your information as required by law or for legitimate business purposes (including to help address fraud and spam)."
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	You can delete your account from Preferences page or by emailing Tumblr and providing proof of authority over the account. Note that deleting your account may not fully remove the content that is published from Tumblr's systems, as caching of, backups of, copies of, or references to your account information may not be immediately removed. Further, given the nature of sharing on Tumblr, some of the public activity on the account prior to deletion may remain stored on servers

Social Network	Findings	Notes
		and accessible to the public.
Twitter	Yes	There is a link with instructions about deactivating and deleting your account. For up to 30 days after deactivation it is still possible to restore account. After 30 days, Twitters begins the process of deleting your account from their system, which can take up to a week.
Wikimedia Foundation	No	
WordPress.com	No	-There is a link to contact the ‘support team’ if you have questions about deleting or correcting their personal data.
WordPress.org	No	
World of Warcraft	Yes	You can request to have your personal information deleted by contacting Privacy Policy Administrator at mailing address or email provided. Requests will be responded to within 30 days. In some cases the company may not be able to delete your personal information and will retain and use your information as necessary to comply with legal obligations, resolve disputes, and enforce agreements. Deleting your data will lead to the termination of your account and applicable services.
YouTube (Google)	Yes	You can “review and control certain types of information tied to Google Account by using Google Dashboard.” 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.” A link is given to Data Liberation Front (the central location for information on how to move your data in and out of Google products).
Zynga	Yes	If you don’t want Zynga to make active use of your information you can send an email to privacy@zynga.com . There are instructions provided to delete your account, which include placing “Delete My Account” in the subject line of an email that includes your name, email address, and user ID number for the

Social Network	Findings	Notes
		social networking services from which you access Zynga games. The company will respond to request within 30 days. Certain records, for example those pertaining to payments or customer service matters, will be retained for legal and accounting purposes.

Collection, Use and Disclosure of PII

What counts as personally identifiable information (PII) that the site collects?

Social Network	Findings	Notes
Blogger (Google)	Personal information is the information that the you provide to Google which personally identifies you, “such as your name, email address or billing information, or other data which can be reasonably linked to such information by Google.” Google may collect information from your 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.	Google does not specify whether the information they get from our use of their services is non-personally identifiable information.
Club Penguin	The parent’s email address, as well as the parent’s name and credit card information.	Your country of residence, favourite colour, Operating System, IP address and web browser are considered to be non-PII
Facebook		Information that is always publicly available is not ‘personally identifiable information. This includes your: name, profile pictures and cover photos, network, gender, username and user ID. The company may receive info such as the time, date, and place you took a photo or video. This is

Social Network	Findings	Notes
		<p>also not personally identifiable information per Facebook. Further, the company may collect IP address, Internet service, location, type of browser, or the pages you visit, as well as your GPS location. It may also receive data from games, applications, or websites using Facebook Platform through cookies. It also receives data from advertising partners, customers and other third parties. None of this data constitutes personally identifiable information for the company.</p>
Flickr (Yahoo)	There is no distinction is made between PII and non-PII.	
Foursquare	The following are regarded as personally identifiable information: Name, email, phone, birthday, Twitter/Facebook user names, browser information, location, IP, cookie info.	The company does not distinguish between personally identifiable information and non-personally identifiable information.
Google +	Personal information is the information that the you provide to Google which personally identifies you, “such as your name, email address or billing information, or other data which can be reasonably linked to such information by Google.” Google may collect information from your 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	Google does not specify whether the information they get from our use of their services is non-personally identifiable information.

Social Network	Findings	Notes
	(i.e. GPS signals, location from Wi-Fi access points and cell towers), Unique application numbers, local storage, and cookies and anonymous identifiers.	
Instagram	No distinction is made between PII and non-PII.	Username, password, email, contact information, photos, communications with other users, cookie info, Internet Protocol ("IP") address, browser type, referring / exit pages and URLs, number of clicks and how you interact with links on the Service, domain names, landing pages, pages viewed, and other such information. We may also collect similar information from emails sent to our Users which then help us track which emails are opened and which links are clicked by recipients.
LinkedIn	<p>PII includes your name and email. Non-PII includes: information provided to third parties through cookies, but may provide general segment information (e.g. your industry, geography, career field, professional or educational background).</p> <p>Ads targeted to you based on non-PII such as compensation bracket, gender, age, ethnic origin, nationality, or other aspects of your life are also considered non-PII.</p>	
LiveJournal	PII includes: name, date of birth, contact information. Non-PII includes: interests, schools, and	

Social Network	Findings	Notes
	other biographical data, browser info, IP address, cookies, and pages that you request.	
Meetup	<p>PII includes: email address, IP address, and your name.</p> <p>Non-PII includes: information obtained from cookies and web beacons such as the URL you came from and go to, as well as your browser information.</p>	
MySpace	Includes name and contact info.	Non-PII includes: IP, browser type, date of birth, interests, hobbies, lifestyle choices, videos/pictures, and your private messages.
Nexopia	<p>PII Includes, but is not limited to: name, email, username, sex, location and age. You 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.</p> <p>Profile Data is not Personal Information collected by Nexopia.</p>	Non-PII includes: IP address, aggregate user data, and browser type.
Ping (Apple)	The company may collect your name, mailing address, phone number, email, contact preferences, and credit card information. 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. In the US,	Non-PII includes: 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.

Social Network	Findings	Notes
	<p>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>	
Pinterest	<p>Information collected can include name, photos, pins, comments, email, location, log data, and Internet Protocol address you use.</p>	<p>There's no mention of whether the information is considered to be personal.</p>
Plenty of Fish	<p>The company 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>Non-PII includes: browser type, referring URL, aggregated non-personal customer information, tracking information from web beacons or pixel tags.</p>
Reddit	<p>The company collects your email address, name, phone number, age, gender, user name, password. Cookies may contain PII and such cookies may be shared with affiliates and other companies.</p>	<p>Non-PII includes: automatically collected information about the 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>The company collects account information, which includes: username, password and email address, birthday. It may also collect your gender, for example, from a third party that is linked to Tumblr account. Financial information from credit card may also be collected,</p>	<p>Non-PII includes: your browser type and its 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, and web browser</p>

Social Network	Findings	Notes
	but that information is stored by a third party payment processor. Your IP address may be associated with your account and may be used to personalize your Services.	extensions.
Twitter	Personal information includes your name, username, password, and email address.	Non-PII includes your public user profile information, public tweets, the people you follow or that follow you, and the number of users who clicked on a particular link.
Wikimedia Foundation	Information includes username, email address, IP address, and other raw log data.	The company does not mention non-PII.
WordPress.com	Information collected that is personally identifiable includes your 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.	Non-PII includes: browser type, language preference, referring site, and the date and time of each visitor request.
WordPress.org	Personally identifiable information includes your username and email address.	Non-PII includes: browser type, language preference, referring site, and the date and time of each visitor request.
World of Warcraft	PII collected may include: name, home address, phone number, and/or email address. If you purchase products or services you will have to provide additional information such as credit card number, expiration date, and shipping and billing address.	Non-PII includes: username, password, age, date of birth, gender, game/platform preferences; geographic location, information regarding your computer, information from cookies and clear .gif images.

Social Network	Findings	Notes
<p>YouTube (Google)</p>	<p>Personal information is the information that you provide 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.” Google may collect information from the your 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>	<p>Google does not specify whether the information they get from our use of their services is non-personally identifiable information.</p>
<p>Zynga</p>	<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, and birthday.</p>	<p>The company does not mention non-PII.</p>

Does the PII collected change depending on if you're an adult or a child?

Social Network	Findings	Notes
Blogger (Google)	No	
Club Penguin	Yes	PII collected is the parent's.
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	No one under 13 is able to use Foursquare.
Google +	No	
Instagram	No	No one under 13 is able to use Instagram.
LinkedIn	No	Not available for use by anyone under 19.
LiveJournal	No	No one under 13 is able to use LiveJournal.
Meetup	No	Not available for use by anyone under 18.
MySpace	No	No one under 13 is able to use MySpace.
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	No	No one under 13 is able to use Pinterest.
Plenty of Fish	No	Not available for use by anyone under 18.
Reddit	Yes	No one under age 13 is allowed to provide any PI or use public discussion areas, forums and chats.

Social Network	Findings	Notes
Tumblr	No	
Twitter	Yes	No one under 13 is able to use Twitter.
Wikimedia Foundation	No	
WordPress.com	No	
WordPress.org	No	
World of Warcraft	Yes	No one under 13 is able to use World of Warcraft.
YouTube (Google)	No	
Zynga	Yes	No one under 13 is able to use Zynga.

Who is your Personally Identifiable Information (PII) disclosed to?

Social Network	Findings	Notes
Blogger (Google)	Google may share aggregated, non-personally identifiable information publicly and with their partners (e.g. publishers, advertisers, or connected sites).	Google will not share PII with companies, organization and individuals outside of Google unless: with your consent; with domain administrators consent; for external processing (“We provide personal information to our affiliates or other trusted businesses or person to process it for us.”), or for legal reasons.
Club Penguin	PII may be transferred to the Walt Disney family of companies and to law enforcement agencies.	
Facebook	Friends, partners, advertisers, and developers.	
Flickr (Yahoo)		<p>Yahoo! does not rent, sell, or share PI with other people or nonaffiliated 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"> • “We provide the information to trusted partners who work on behalf of or with Yahoo! under confidentiality agreements;” • “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;” • “We respond to disclosure demands if permitted or required by law;” • “We transfer information about you if Yahoo! is acquired by or merged with

Social Network	Findings	Notes
		<p>another company;”</p> <ul style="list-style-type: none"> • Yahoo! lets other companies that show advertisements on some of their pages set and access their cookies on your computer.
Foursquare	PII is shared with friends, third party contractors, and partners.	No PII is rented or sold to anyone.
Google +	Google may share aggregated, non-personally identifiable information publicly and with their partners (e.g. publishers, advertisers, or connected sites).	Google will not share PII with companies, organization and individuals outside of Google unless: with your consent; with domain administrators consent; for external processing (“We provide personal information to our affiliates or other trusted businesses or person to process it for us.”), or for legal reasons.
Instagram	Business affiliates, third party organizations, service providers, or third party advertisers.	Data may be anonymized.
LinkedIn		LinkedIn will not share PI to third parties without user’s explicit consent unless: to comply with legal process, enforce their Terms of Service agreement, to 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. 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. 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.

Social Network	Findings	Notes
LiveJournal		<p>LiveJournal may share your identifiable personal information with third parties under the following circumstances:</p> <p><i>Operations:</i> service providers, contractors, and vendors may be granted accesses to internal systems that contain PI in order to improve operations and Service.</p> <p><i>Sponsored Contests and Giveaways:</i> If you participate in a contest, etc. LiveJournal may transfer PI to third party advertiser or service provider, but will do their best to warn user when they are agreeing to this sharing.</p> <p><i>Ad Service:</i> LiveJournal may share aggregate and Non-PII generalized data to third parties.</p> <p><i>Ad Networks:</i> 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.</p> <p><i>Legal Process:</i> They may share PII with U.S. Law enforcement officers.</p> <p><i>Sale of Business:</i> PI may be shared or transferred to the buyer if LiveJournal is sold.</p>
Meetup		<p>Cookies and web beacons provided by ‘site analytics’ partners are used. Further, information you 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</p>

Social Network	Findings	Notes
		and other similar programs.
MySpace		Other users, employees, agents, contractors, service providers, and sponsors may access your PII.
Nexopia		<p>The company 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. Nexopia may contact financial institutions to verify credit card info and, in doing so, share information they receive about credit card and member. Further, the company may share some or all of a member's PII with any parent company, subsidiary, joint ventures, or Affiliate companies. PII will likely be among the assets transferred if Nexopia goes through a merger, sale, or acquisition.</p> <p>The company 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. Finally, Nexopia will not disclose PI to any third party except when required by law, to enforce ToS 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)		At times Apple may make certain personal information available to strategic partners

Social Network	Findings	Notes
		<p>that work with Apple to provide products and services, or that help Apple market to customers. Apple shares PI 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. It may be necessary, by law, legal process, litigation, and/or requests from public and governmental authorities for Apple to disclose PI. 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. Apple 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 PI to the relevant third party.</p>
Pinterest		<p>The company may share your PII with third party companies or security consultants.</p>
Plenty of Fish		<p>The company 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 PII is used in a manner consistent with their Privacy Policy. When credit card details are provided, you consent to credit card details being provided to payment processors and financial institutions</p>

Social Network	Findings	Notes
		<p>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. The company may share PII with corporate subsidiaries, affiliates or divisions for internal business purposes. Further, the company may disclose information as permitted or required by law.</p> <p>Elements of PII will be used to create a list of users that advertisers may want to direct their campaigns to.</p>
Reddit		<p>Reddit may grant access to their database by third parties that provide services, such as technical maintenance or forums and job search software. The company may also forward information to third parties for services such as credit card processing and order fulfillment.</p> <p>You might provide information about yourself in areas of the site that may be managed by third parties. Reddit may provide information to advertisers, and it 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. Further, the company 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. Finally, cookies may contain PII and such cookies may be</p>

Social Network	Findings	Notes
		shared with affiliates and other companies.
Tumblr		<p>By default, content published through the Tumblr is shared with the public. User may choose to share information provided to Tumblr with Third Party Services (e.g. by syndicating posts to Twitter or Facebook).</p> <p>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. 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. Finally, 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>
Twitter		<p>Twitter 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. Further, the company may share private personal information with service providers subject to confidentiality</p>

Social Network	Findings	Notes
		<p>obligations.</p> <p>Twitter may also 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, and the company may share or disclose non-private, aggregated or otherwise non-PII.</p>
Wikimedia Foundation		<p>The organization is composed of dedicated users chosen by the community who are given privileged access; users who have access to 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>The organization may be compelled by law to disclose information about a registered user.</p>
WordPress.com		<p>The company 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. Automattic discloses potentially PII and PII in response to a</p>

Social Network	Findings	Notes
		<p>subpoena, court order or other governmental request, or when Automatic believes in good faith that disclosure is reasonably necessary to protect the property or rights of Automatic, third parties or the public at large. Finally, in the event of a business transfer, any acquirer of Automatic may continue to use visitors PI as set forth in the privacy policy.</p>
WordPress.org		<p>Automatic 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. It will also disclose what is potentially PII and what is certifiability PII when required to do so by law, or 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>Blizzard may need to disclose PII to third party vendors to fulfill product orders, to process mailings, or to process, analyze, and/or store data on Blizzard's behalf. The company 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. Finally, the company may disclose PII if Blizzard decides to sell a line of business to a third party.</p>
YouTube (Google)		<p>Google will not share PII with companies, organization and individuals outside of Google unless: with your consent; with domain administrators consent; for external processing ("We provide personal</p>

Social Network	Findings	Notes
		<p>information to our affiliates or other trusted businesses or person to process it for us.”), or for legal reasons. The company may also share aggregated, non-personally identifiable information publicly and with their partners (e.g. publishers, advertisers, or connected sites.)</p>
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). Moreover, in most Zynga games, a user’s social networking service 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 networking service User ID number or Zynga ID.</p> <p>In addition, the company 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. The company also notes that “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</p>

Social Network	Findings	Notes
		<p>health/safety of user, another person, or public, and in order to protect the rights or property of Zynga.</p> <p>Finally, in the event that Zynga undergoes a business transition, PII may be a portion of the assets sold.</p>

Will your Personally Identifiable Information (PII) possibly be disclosed to law enforcement agencies? If so, why?

Social Network	Findings	Notes
Blogger (Google)	Yes	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: meet any applicable law, regulation, legal process or enforceable governmental request; enforce applicable Terms of Service, including investigation of potential violations; detect, prevent, or otherwise address fraud, security or technical issues; or protect against harm to the rights, property or safety of Google, our users or the public as required or permitted by law.
Club Penguin	Yes	PII is provided to authorities when required by law or in response to their requests.
Facebook	Yes	Facebook may access, preserve and share users information in response to a legal request (like a search warrant, court order or subpoena): if they have a good faith belief that the law requires them to do so; if it is necessary to detect, prevent and address fraud and other illegal activity; if they need to protect Facebook, users and others, including as part of investigations; and if the information would prevent death or imminent bodily harm.
Flickr (Yahoo)	Yes	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	The company discloses information if necessary to comply with laws, enforce Foursquare’s conditions, or to protect property and safety of employees or users.
Google +	Yes	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

Social Network	Findings	Notes
		reasonably necessary to: meet any applicable law, regulation, legal process or enforceable governmental request; enforce applicable Terms of Service, including investigation of potential violations; detect, prevent, or otherwise address fraud, security or technical issues; or protect against harm to the rights, property or safety of Google, our users or the public as required or permitted by law.
Instagram	Yes	“We may access, preserve and share your information in response to a legal request (like a search warrant, court order or subpoena) if we have a good faith belief that the law requires us to do so. This may include responding to legal requests from jurisdictions outside of the United States where we have a good faith belief that the response is required by law in that jurisdiction, affects users in that jurisdiction, and is consistent with internationally recognized standards.”
LinkedIn	Yes	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: investigate, prevent or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; investigate and defend LinkedIn against any third party claims or allegations, or to protect the security or integrity of the site; or to exercise or protect the rights, property or personal safety of LinkedIn, users, employees, or others.
LiveJournal	Yes	LiveJournal may share PII 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 [Terms Of Service], and/or if it is necessary to comply with, and/or cure a potential violation or breach of, U.S. law.”
Meetup	Yes	Meetup may disclose PII when required by law, or if they have good-faith belief that such action is

Social Network	Findings	Notes
		necessary to comply with a judicial proceeding, a court order or legal process, enforce the Terms of Service, respond to claims that your PII violates the rights of third parties, or protect the rights, property or personal safety of Meetup, its members and the public.
MySpace	Yes	Information may be disclosed to protect or defend MySpace, its affiliates and employees; to ensure the safety of other users, fraud and risk management; or to comply with legal processes.
Nexopia	Yes	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	“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	The company will disclose information to authorities if doing so is considered necessary for legal compliance or request, protecting safety of users or employees, prevention of fraud.
Plenty of Fish	Yes	Plenty of Fish may disclose information as permitted or required by law. The company may also be compelled to release information by a court of law or other person or entity with jurisdiction to compel production of such information. If Plenty of Fish 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.
Reddit	Yes	Reddit may provide access to their database in order to

Social Network	Findings	Notes
		cooperate with official investigations or legal proceedings, including, for example, in response to subpoenas, search warrants, court orders, or other legal process.
Tumblr	Yes	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	Twitter may preserve or disclose user information if they believe that it is necessary to comply with a law, regulation or legal request. 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.
Wikimedia Foundation	Yes	<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.” 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> <p>“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.”</p>
WordPress.com	Yes	Automatic discloses potentially PII and PII in response to a subpoena, court order or other

Social Network	Findings	Notes
		governmental request.
WordPress.org	Yes	WordPress.org discloses potentially PII and PII when required to do so by law.
World of Warcraft	Yes	Blizzard reserves the right to disclose PII 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)	Yes	<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 meet any applicable law, regulation, legal process or enforceable governmental request. Information may also be shared to enforce applicable Terms of Service, including investigation of potential violations.</p> <p>Personal information may also be disclosed in the event of detecting, preventing, or otherwise addressing fraud, security or technical issues.</p> <p>Finally, the company reserves the right to disclose PI to protect against harm to the rights, property or safety of Google, our users or the public as required or permitted by law.</p>
Zynga	Yes	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.

Can you opt out of disclosing your Personally Identifiable Information (PII)?

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.” Also under the “Information we share” heading, Google states that opt-in consent is required for the sharing of any sensitive personal information.
Club Penguin	Yes	You can contact the site to have your PII deleted or to request that they no longer keep my information.
Facebook	Yes	If you am uncomfortable sharing my real name, you can always delete your account. Similarly, if you’re uncomfortable making your profile and cover photos public, I can delete them. If you are uncomfortable making your network public, you can leave the network.
Flickr (Yahoo)	Yes	You can edit your Yahoo! Account Information through link provided.
Foursquare	No	Not without deleting your account.
Google +	No	Under “Information you share” heading, Google states: “Our services provide you with different options on sharing and removing your content.” Also under the “Information we share” heading, Google states that opt-in consent is required for the sharing of any sensitive personal information.
Instagram	No	
LinkedIn	Yes	You 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, and control whether LinkedIn uses your name and profile photo in social ads.
LiveJournal	Yes	You can opt out of network advertising cookies of Network Advertising Initiative members. Link provided.

Social Network	Findings	Notes
Meetup	No	
MySpace	Yes	“If you ask MySpace to stop using your PII, MySpace will honor that request while retaining any record of your PII that is necessary to comply with applicable federal, state or local law.”
Nexopia	Yes	You may change or remove any Profile Data by logging into your account and clicking on the “Profile” and “Preferences” tabs, except for username, age, sex, and location. The company suggests checking the Help menu of browser to configure browser to accept or reject cookies.
Ping (Apple)	No	
Pinterest	Yes	Only by deleting your account.
Plenty of Fish	Yes/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 information provided	
Tumblr	Yes	Tumblr provides instructions for turning off cookie feature on browser. Moreover, you are given an explicit choice regarding information about contacts. Finally, you can choose whether Tumblr can collect or store information related to your mobile device, such as your phone number.
Twitter	Yes	You must authorize third party web clients or applications to access your Twitter account. You can delete imported address book contacts at any time through link provided on the company’s website. Finally, you can make information private through ‘settings’ link on Twitter’s website.
Wikimedia Foundation	No	

Social Network	Findings	Notes
WordPress.com	No	“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	No	“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 personal information 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)	No	Under “Information you share” heading, Google states: “Our services provide you with different options on sharing and removing your content.” Also under the “Information we share” heading, Google states that opt-in consent is required for the sharing of any sensitive personal information.
Zynga	Yes	Zynga offers functionality that lets you opt-out of public indexing of your public profile information. Further, you can opt in to receive information from a third party.

Security

Does the site make commitments to keeping your personally identifiable information (PII) secure?

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 restricts access to personally identifiable information to Google employees, contractors and agents, and subject them to strict contractual confidentiality obligations.
Club Penguin	Yes	Physical and electronic security exists and sensitive information is encrypted.
Facebook	Yes and 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	Flickr limits access to personal information to employees who they believe reasonably need to come into contact with that info. They have physical, electronic, and procedural safeguards that comply with their legal obligations to protect personal information.
Foursquare	Yes/No	PII is password protected, but “foursquare cannot guarantee the security of user account information.”
Google +	Yes	Google encrypts many of their services using SSL; offers a two step verification when accessing Google Account; and restricts access to PII to Google employees, contractors and agents, and subject them to strict contractual confidentiality obligations.
Instagram	Yes/No	“We use commercially reasonable safeguards to help keep the information collected through the Service secure and take reasonable steps (such as requesting a unique password) to verify your identity before granting you access to your account. However, Instagram cannot ensure the security of any information you transmit to Instagram or guarantee that information on the Service may not be accessed,

Social Network	Findings	Notes
		disclosed, altered, or destroyed.”
LinkedIn	Yes/No	Personal information is password-protected and sensitive data is protected by SSL encryption. LinkedIn regularly audits its system for possible vulnerabilities and attacks, and uses a tier-one secured-access data center. 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.
LiveJournal	Yes	Whenever you post content anywhere on the Service, LiveJournal makes reasonable efforts to ensure user’s privacy in the following manner: Safeguards (physical, electronic, and procedural safeguards are used to protect personal information); Encryption (in certain areas SSL encryption is used to protect data transmissions).
Meetup	None specified	
MySpace	Yes	“Physical, technical and administrative safeguards.”
Nexopia	Yes/No	Nexopia uses physical and electronic precautions to protect member personal information. The company cannot guarantee the absolute security of PII 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.
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	None specified	
Plenty of Fish	Yes	The company maintains appropriate safeguards and current security standards to protect personal information, whether recorded on paper or captured electronically, against unauthorized access, disclosure,

Social Network	Findings	Notes
		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 personal information 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 cannot 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	Tumblr seeks “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	Automatic takes all measures reasonably necessary to protect against the unauthorized access, use, 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 collected will remain secure and in its original form. Access to all personal information is controlled, and SSL encryption used when credit card

Social Network	Findings	Notes
		information is transmitted. Blizzard will take reasonable steps to assure that third parties to whom they transfer any data will provide sufficient protection of personal information.
YouTube (Google)	Yes	Google encrypts many of their services using SSL; offers a two step verification when accessing Google Account; and restricts access to PII to Google employees, contractors and agents, and subjects them to strict contractual confidentiality obligations.
Zynga	Yes/No	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. However, Zynga cannot guarantee that unauthorized access, hacking, data loss, or other breaches will never occur.

If there's a breach of information on the site, will they let you know?

Social Network	Findings	Notes
Blogger (Google)	No answer given	
Club Penguin	No answer given	
Facebook	No answer given	
Flickr (Yahoo)	No answer given	
Foursquare	No answer given	
Google +	No answer given	
Instagram	No answer given	
LinkedIn	No answer given	
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 answer given	
MySpace	No answer given	
Nexopia	No answer given	
Ping (Apple)	No answer given	
Pinterest	No answer given	
Plenty of Fish	No answer given	
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 answer given	
Wikimedia	No answer given	

Social Network	Findings	Notes
Foundation		
WordPress.com	No answer given	
WordPress.org	No answer given	
World of Warcraft	No answer given	
YouTube (Google)	No answer given	
Zynga	No answer given	

Access and Correction Options

Can you correct or update your Personally Identifiable Information (PII) if you want to? Does the site tell you how to do this?

Social Network	Findings	Notes
Blogger (Google)	Yes	You 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	Parents and users who have parental consent can request access to their personally identifiable information.
Facebook	Yes	You can access most of you personal data stored by Facebook by logging into your account and viewing your timeline and activity log. You can also download a copy of your Facebook data in an expanded archive through a link that’s provided on Facebook’s website.
Flickr (Yahoo)	No	Flickr only mentions: “you can edit our Yahoo! Account Information... at any time.”
Foursquare	Somewhat	Your password, phone, email can be updated through user settings page
Google +	Yes	You 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.”
Instagram	Yes	You can update your account at any time by logging in and changing my profile settings.
LinkedIn	Yes	You can review the personal information you’ve provided to LinkedIn and make any desired changes to the information you’ve publish at any time by logging into their account.
LiveJournal	No	
Meetup	Yes	After registration for Meetup and for specific topic

Social Network	Findings	Notes
		groups, the company provides a way to update your PII.
MySpace	Yes	Reasonable steps can taken to correct any PII that is discovered to be incorrect. This is done through Edit Profile and Account Settings.
Nexopia	Yes	“Nexopia permits requests for access to and review of Personal Information collected by Nexopia about an individual by the individual concerned.”
Ping (Apple)	Yes	“Apple makes good faith efforts to provide users access to personal information.”
Pinterest	Yes	“Access and change information in your profile page at any time”.
Plenty of Fish	Yes/No	“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.” For security purposes, not all PI is accessible and or can be changed by the Privacy Officer.
Reddit	No	
Tumblr	Yes	Registered users can access and delete most information associated with their account by logging into the services and checking account settings page. California residents can request a copy of PII that is shared with affiliates and/or third parties.
Twitter	Yes	Registered users are provided with tools and account settings to access or modify the PII 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

Social Network	Findings	Notes
		disclosure of PII to third parties.
YouTube (Google)	Yes	You 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.”
Zynga	Yes	“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.”

References

Privacy Policies and Terms of Service documents were all collected from companies' public websites, as accessed from a Canadian IP address.

About the Authors

This document was researched and written by Michael Smith and Christopher Parsons.

Michael Smith is a Masters student in Political Science at the University of Victoria, and was employed as a research assistant for the CATSMI Project. He is currently employed with the Office of the Chief Information Officer of British Columbia.

Christopher Parsons is a privacy-by-design ambassador, a well-recognized member of the Canadian privacy community, and a Principal at BlockG Security and Privacy Consulting. He has over a decade's experience working with challenging privacy issues that are linked to digital technologies. He specializes in how Canadian privacy law intersects with digital systems, and the implications of such law on the development and deployment of novel projects and practices. Christopher is presently completing his Ph.D in the Department of Political Science at the University of Victoria, where he is a fellow at the Centre for Global Studies. He has published in the Canadian Journal of Law and Society, European Journal of Law and Technology, Canadian Privacy Law Review, CTheory, and has book chapters in a series of academic and popular books and reports.

Legal Information

Copyright © 2013 by The Canadian Access to Social Media Information Project. All rights reserved.

Electronic version first published at www.catsmi.ca in Canada in 2013 by The Canadian Access to Social Media Information (CATSMI) Project.

The authors have made an online version of this work available under a Creative Commons Attribution 2.5 (Canada) License. It can be accessed through the CATSMI Project Web site at <http://www.catsmi.ca>.



Header designed by Karen Yen of Can Poeti Branding and Design.

The materials contained in this report are copyright to The Canadian Access to Social Media Information Project. All brand and product names and associated logos contained within this report belong to their respective owners and are protected by copyright. Under no circumstance may any of these be reproduced in any form without the prior written agreement of their owner.

Information presented in this document is for academic and educational purposes only. These materials do not constitute solicitation or provision of legal advice. The CATSMI Project makes no claims, promises, or guarantees about the accuracy, completeness, or adequacy of the information contained in this document. Nothing herein should be used as a substitute for the legal advice of competent counsel.