

Project on GDPR user consent & privacy policies

Nataliia Bielova

Nataliia.bielova@inria.fr

- Group #1: Group video and chat tools
- https://www.skype.com/en/
- https://zoom.us/
- https://signal.org/

Participants:

Minh Nhat, Franz, Elias, Sai

Time of presentation on 8 Jan, 2020: 13h30 – 14h15

Group chat:

https://join.skype.com/j134SFbc9Knv

Group #2: Health

- https://www.who.int/
- https://www.nih.gov/
- https://www.nhs.uk/

Participants:

Enrico, Charles, Quentin

Time of presentation on 8 Jan, 2020: 14h15 – 15h00

Group chat:

https://join.skype.com/c5JCZic898lg

Group #3: Shopping

- https://www.amazon.com/
- https://www.ebay.com/
- https://www.ikea.com/

Participants:

Marianna, Jean Elisee, Jasmine

Time of presentation on 8 Jan, 2020: 15h15 – 16h00

Group chat:

https://join.skype.com/gaBgrXpNsl3G

- Group #4: Business
- https://www.investopedia.com/
- https://finance.yahoo.com/
- https://www.marketwatch.com/

What to do:

- Describe the website (max 6 pages)
 - Does GDPR appliy to the website provider? Where the website is registered?
 Does it provide services to the users located in the EU?
 - Does the website show a cookie banners?
 - ✓ Analyse a cookie banner as a GDPR consent (see next slides)
 - Does the website provide a privacy policy or cookie policy?
 - ✓ Analyse a privacy policy of the website (see next slides)

What to do (2):

- Make a presentation (15-20min) on your work
- Send me (<u>nataliia.bielova@inria.fr</u>) before the presentation
 - Your analysis of the website (max 6 pages, pdf)
 - Your class presentation (ppt or pdf)
- You'll get a mark for the project

Analyse a cookie banner as a GDPR consent

Store all the evidence of your analysis. Collect screenshots of

- the initial cookie banner interface
- all the layers of the cookies banner interface with which you interacted during your analysis.
- Always add the evidence in your report and presentation!

Analyse a cookie banner as a GDPR consent (2)

- Is the banner compliant with the requirements of valid consent?
 - Is the banner providing a free consent?
 - Is consent specific: is it precise enough and separate for each purpose?
 - Is consent informed: does it provide enough information in clear and plain language for non-specialists? Is it intelligible and easy to understand?
 - ✓ If the website provides a cookie policy and privacy policy, analyse both (see next slides)
 - Is consent unambiguous?

Analyse a privacy policy of the website

Store all the evidence of your analysis.

- Store the full text of the privacy policy in a PDF.
- Store any other policies analysed in the project in PDFs.

Attach all PDFs in the appendix of your report.

Analyse a privacy policy of the website (2)

- What type of data is being collected? Is it personal data?
 - Provide the text extract from the privacy policy that you analyse.
 - Analyse whether the collected data is personal following the definition and further reasoning (see slides from the lecture C1)

Identify

- who is a data controller that determines the purposes and means of processing personal data?
- Is there a third-party data processor that acts on behalf of a data controller? Is there a data processor?
- For what purpose the data is used?
- Is there a precise legal basis associated to the purpose?

Analyse a privacy policy of the website (3)

 What type of data is used by the website provided? For what purpose?

- Is data shared with third parties?
 - What type of data? Is it personal data?
 - For what purpose the data is shared?
 - Is legal basis of for this purpose explained?

Analyse third parties actually present on website

- Why a third party is present?
- Are third-party cookies used?
 - If yes, what is the purpose of each cookie (check cookie policy)?
 - Is the purpose clear? What legal basis is applied to it?

Do these three sources of information match?

- third parties mentioned in the policy
- third parties mentioned in the cookie banner
- third parties actually present on the website