

GUIDANCE ON REQUIRED AND RECOMMENDED WEBSITE PRIVACY POLICY

WHY WEBSITE PRIVACY POLICIES ARE IMPORTANT

More and more consumers are paying attention to online privacy and security issues in today's environment – and they should. Today's wired world provides opportunities to better secure data, but it also often increases the risk of misuse of data.

At Penn, we use websites to inform the world about exciting new academic, research and health care developments for example. We use websites to perform research, take applications, sell or provide products and services and for a host of other reasons. Because of rising concerns about privacy, however, it is appropriate for us to consider the expectations of website users, and the nature of information collected, and post a website privacy policy where appropriate. A website privacy policy informs the visitor about what information is collected, how it will be used, to whom it will be disclosed and other privacy-related issues.

Posting a website privacy policy is a sign to the visiting population that you understand privacy concerns and have built your website with them in mind. It shows that you value open communication about privacy and are willing to articulate and stand by your privacy practices. The policy can help make visitors to your site more comfortable about purchasing products for example, or signing up to participate in a research protocol.

We have developed a [Privacy Policy](#) that may be used for University of Pennsylvania websites.

WHEN AND WHERE TO POST

In some cases, posting a privacy policy is required for compliance; in others it is not required but is nevertheless a good idea.

Required on Certain E-Commerce Sites. Websites that accept credit card payments must post a privacy policy. Such sites must include in the policy a description of the intended uses and disclosures of the contact and credit card information and, where applicable, authorization for periodic payments for subscription transactions.

Recommended:

Whether required or not, posting a website privacy policy is often a good idea, particularly on certain types of websites. At Penn, we are strongly encouraging their use in instances where a website is collecting personal information, such as:

- web-based surveys: especially if it involves the collection of sensitive information, a privacy policy may very well make end users more comfortable with participating in the survey.
- web-based research: similar to web-based surveys, instances where individuals understand that there are controls in place to protect the information they are submitting online may encourage their willingness to participate.

In these and other cases, it is important to consider the expectations and interests of visitors to your website, your ability to clearly state your practices, and that you can implement controls to ensure adherence to what is stated online.

Placement of Policies.

. In many cases, privacy policies are found via a link at the bottom of a website home page. A good practice is to link to a privacy policy close to the area where personal information is collected online.

RESOURCES

If you have questions on whether, where or what to post regarding a website privacy policy, please contact the Office of Audit, Compliance and Privacy at privacy@upenn.edu, or 215-573-4492, or call University Communications at 215-898-8721.