Privacy Concerns: An Introduction



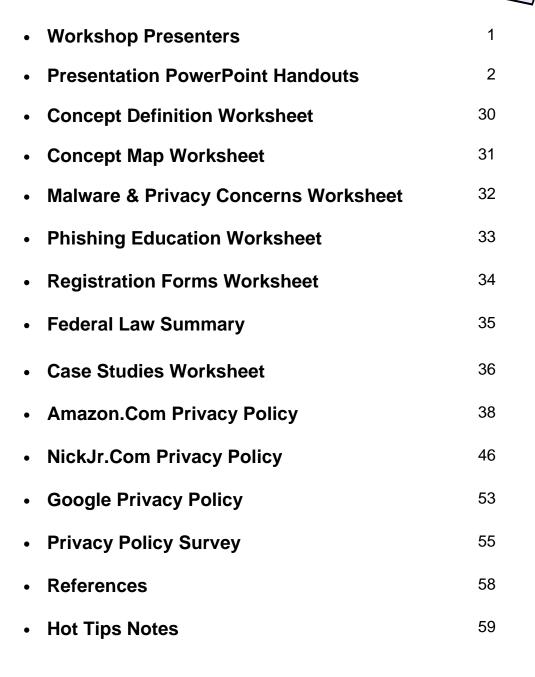
March 2, 2006

Elisa Bertino Melissa Dark Clewin McPherson Joanne Troutner





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Presenter Backgrounds

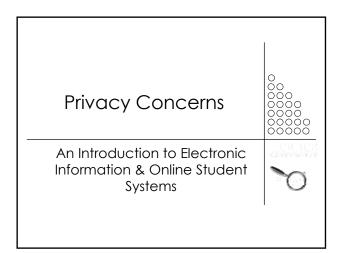


Dr. Elisa Bertino is professor of Computer Science and Electrical and Computer Engineering at Purdue University and serves as Research Director of the Center for Education and Research in Information Assurance and Security (CERIAS). Previously she was a faculty member at Department of Computer Science and Communication of the University of Milan where she has been department chair and director of the DB&SEC laboratory. She has been a visiting researcher at the IBM Research Laboratory (now Almaden) in San Jose, at the Microelectronics and Computer Technology Corporation, at Rutgers University, at Telcordia Technologies. Her main research interests include security, privacy, database systems, object-oriented technology, multimedia systems. In those areas, Prof. Bertino has published more than 250 papers and coauthored several books. Elisa Bertino is a Fellow member of IEEE and a Fellow member of ACM and has been been named a Golden Core Member for her service to the IEEE Computer Society. She received the 2002 IEEE Computer Society Technical Achievement Award for "For outstanding contributions to database systems and database security and advanced data management systems".

Dr. Melissa J. Dark is the Assistant Director for Educational Programs at the Center for Education and Research in Information Assurance and Security. She has extensive experience in science, technology, engineering and mathematics (STEM) education. She has led regional and national faculty and curriculum development projects that improve the capacity of our educational infrastructure to provide educational programs in new and emerging areas, such as Information Assurance. She is leading an initiative to develop the common body of knowledge in Information Assurance, which is not yet a discipline. Dr. Dark is also leading a faculty development project that will train 75 faculty in information assurance so that they can start IA programs at their home institutions. She also oversees the development of multimedia information security training products designed for business and industry.

Clewin McPherson is a graduate student in the College of Technology and the Center for Education and Research in Information Assurance and Security (CERIAS) at Purdue University. He also obtained his Bachelor's of Science in Computer Engineering from Purdue University. Clewin's research interests include issues of privacy, security and their application in industry.

Joanne Troutner is an experienced classroom teacher and district administrator. She has been a library media specialist for grades K - 12, a 7th and 8th grade English teacher, a consultant for IBM, and is currently the Director of Media/Technology for Tippecanoe School Corporation. Joanne writes a regular Internet Resource column for an international magazine, *Teacher Librarian*. She is the author of *The Media Specialist, The Microcomputer, and The Curriculum*, a pioneering work in the area of technology. Joanne gives technology presentations at local, state, regional, and national conferences as well as for the Bureau of Education and Research (BER). She has also served on the United States Department of Education. Joanne has a BS and MA from Purdue University.

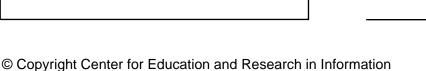


March 2004 North Ridgefield, Ohio

- deletionsDistrict negligent—no backup files on
- District negligent—no backup tiles on separate server

May 2004 Newport Beach, CA

prosecutors wait until police finish investigation before deciding on charges



Assurance and Security, Purdue University, 2006

December 2005 Salem, Mass



• A school psychologist's records with confidential information and personal student struggles were accidentally posted to school system's web site

- publicly available for at least four months.

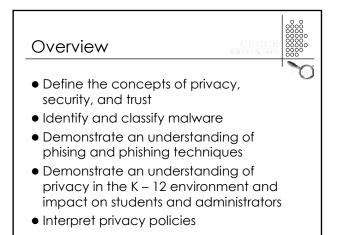
• Google saved contents of school's web site before information was removed.

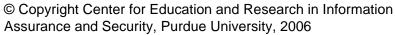
Presenters

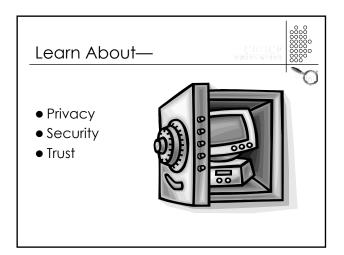


• Dr. Elisa Bertino

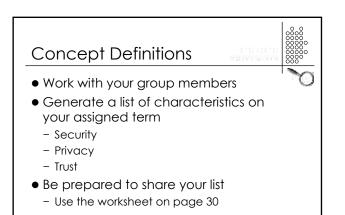
- Director of Research, CERIAS
- Dr. Melissa J. Dark
 - Asst. Dean, College of Technology
- Clewin McPherson
 - Graduate Student, Computer and Information Technology
- Joanne Troutner
 - Director of Media/Technology, Tippecanoe School Corporation

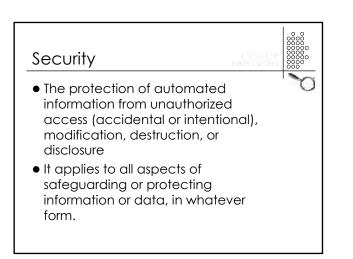












Security— Main Requirements

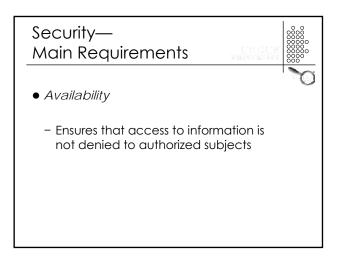


- Confidentiality
 - Refers to information protection from unauthorized read operations
 - The term *privacy* is often used when data to be protected refers to individuals

Security— Main Requirements



- Integrity
 - Refers to information protection from modifications
 - Has several goals-
 - Assuring the integrity of information with respect to the original information (*authenticity*)
 - Protecting information from unauthorized modifications
 - Protecting information from incorrect modifications (*semantic integrity*)



Privacy

- The ability of a person to control the availability of information about and exposure of him- or herself
 - Allows someone to function in society anonymously (including pseudonymous or blind credential identification)
- Data privacy problems exist wherever uniquely identifiable data relating to a person or persons are collected and stored, in digital form or otherwise.

Privacy— Main Requirements

- Confidentiality
 - Refers to information protection from unauthorized read operations
- Autonomy
 - The condition of something that does not depend on anything else
 - A person is autonomous when they can control what information is disclosed about them.

Privacy vs. Security



- Privacy is not just confidentiality and integrity of user data
- Privacy includes other requirements:
 - Support/options for user preferences
 - Support for obligation execution
 - Usability
 - Proof of compliance

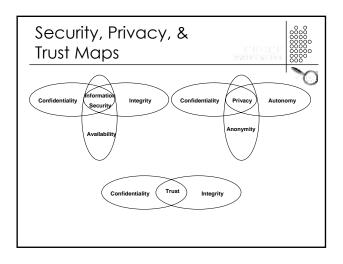
Trust



- Trust is confident reliance.
 - You may have confidence in events, people, or circumstances.
 - Confidence alone does not amount to trust. You must rely on the relationship as well.
 - Windows NT—a relationship between domain controllers in which users who are members of the trusted domain can access services on another trusting domain without the need to log on to the second domain
 - Novell—a relationship dealing with rights allows trusted users access to specific directories

Trust— Image: Constant of the second of

- Compare and contrast privacy, security, and trust.
 - What are the similarities?
 - What are the differences?
- Create a concept map indicating the definition of these concepts.
 - Use the worksheet on page 31





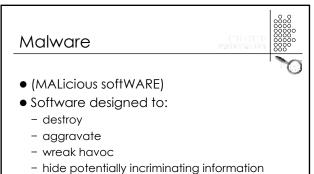




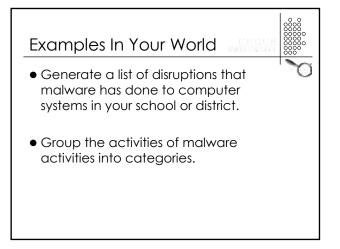
December 2004 Louisville, KY



- Over 10,000 computers infected with w32gabot worm
- Attendance records to library checkout records were affected at duPont Manual High School
 - Lessons disrupted
 - Web assignments not posted
 - Instructional time lost
- In 2003 Jefferson County public schools hit by the doom virus and recovery cost almost \$100,000



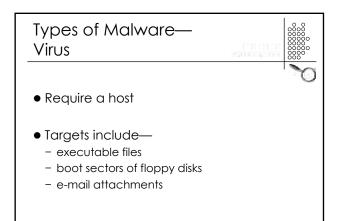
- disrupt and damage computer systems

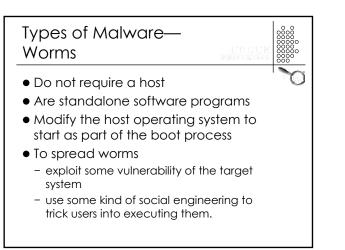


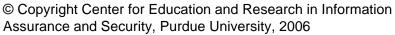
Types of Malware



- Viruses
- Worms
- Trojans
- Malicious active content
- Denial of service attacks
- Software that passively observes the use of a computer (spyware)







Types of Malware— Wabbit



- An uncommon type of selfreplicating malware
- Do not infect host programs or documents
- Do not use network functionality in order to spread to other computers
- Fork bomb

Types of Malware— Trojan



- A harmful piece of software disguised as legitimate software
- Cannot replicate themselves
- Can be deliberately attached to otherwise useful software by a programmer
- Can be spread by tricking users into believing that it is useful
- Can spread or activate other malware, such as viruses.

Types of Malware— Backdoor

00000

- A piece of software that allows access to the computer system bypassing the normal authentication procedures
- Two groups
 - Trojan
 - Worm like
- Ratware
 - Backdoor software which turns computers into zombies for sending spam
 - Can be used for brute force attacks for passwords and encryptions
 - Can distribute denial of service attacks (DDOS)

Types of Malware— Spyware

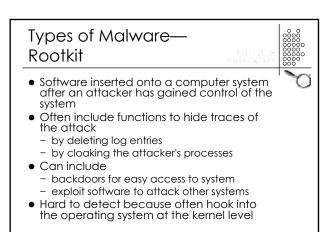
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- A piece of software that collects and sends information
- Usually work and spread like Trojan horses
- Includes adware

Types of Malware— Exploit • A piece of software that attacks



- A piece of software that attacks a particular security vulnerability
- Not necessarily malicious in intent
- Can be a common component of malicious programs such as network worms





Types of Malware— Key Logger



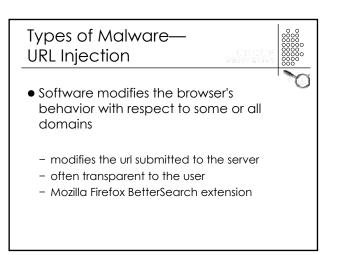
- Software that copies a computer user's keystrokes to a file
- Can be set to "awaken" when computer user connects to secure websites
- Logs the keystrokes *before* encrypted by secure websites

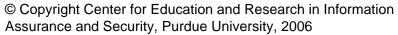


long-distance number

OR

- dials out at night to send keylogger or other information to a hacker





Types of Malware— Bots



- An automated process that interacts with other network services
- Often automate tasks and provide information or services normally conducted by human being
- Examples—
 - web crawlers
 - automatic interacts with IM or IRC
 - automatic interacts with web interfaces

How Computers Become Compromised



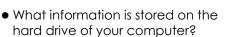
- E-mail attachments
- Links in email messages to malicious (non-trusted) web sites
- Malicious macros
- Free and share software
- Browser pop-ups
- IRC/IM and other P2P (peer-to-peer) software
- Downloads from underground *warez* (illegal pirated software) sites.

Hints Your Computer Is Infected

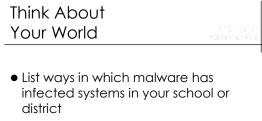
- Malware may be on your computer if—
 - pop-up ads which aren't related to the Web site you're visiting appear
 - your browser settings have changed (often the 'home' page setting is changed)
 - additional browser toolbars
 - computer seems sluggish
 - computer behaves strangely



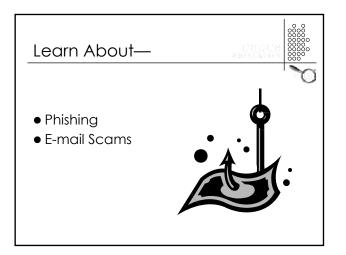
Privacy Concerns



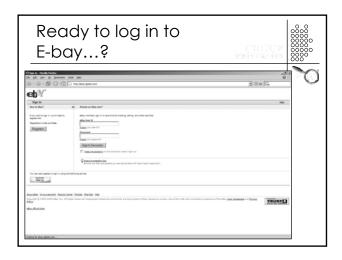
- What information is stored in your home directory on the network?
 - Use the worksheet on page 32



- What systems and programs seem most at risk?
 - Use the worksheet on page 32



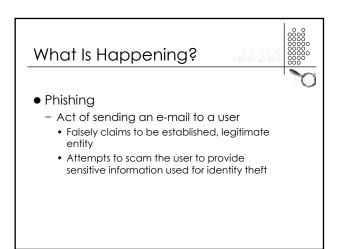














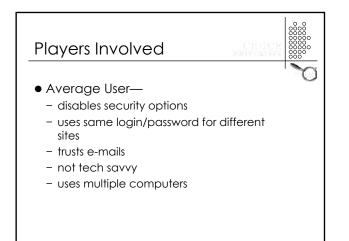
Anatomy of Phishing Attack



- Unauthenticated e-mail
 - Attacker sends fake e-mail to a large number of users
- User actions—
 - Directs users to visit a Web site to update personal information that the legitimate enterprise would have
- Deceptive view—
 - Web site looks very similar to genuine enterprise



- provides online services
- has a database of customer information
- needs to maintain its brand image
- Examples—
 - E-bay
 - PayPal
 - Banks
 - Amazon



Players Involved



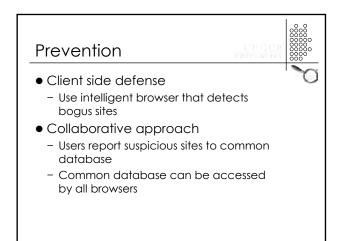
• Phisher

- sets up fake web sites
- sends fake e-mails
- obtains sensitive personal user information
- identity thief or works for someone who sells the information

Damages Caused



- Legitimate Company
 - loss of reputation
 - loss in business
- Average User
 - sensitive personal information stolen
 - identity theft
 - monetary losses
 - does not trust legitimate e-mails
 - may stop doing business on the Internet



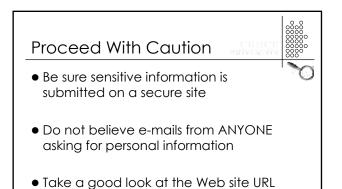


Prevention



• Server side defense

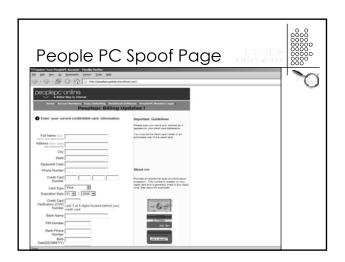
- Legitimate company makes copying content from their servers and web sites harder
- Anti-Phishing Law
 - California has the $1^{\,\mbox{st}}$ anti-phishing law
 - Fines up to \$2,500 per violation
 - Victims may seek actual damages or up to \$500,000 per violation



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Help Your "Clients"

- Make a list of quick ideas you can share with the staff and students in your district to educate them about phishing
- Make a list of quick and effective methods for distributing the information
- Write down one idea and one method of sharing you plan to do yet this week or before next Wednesday
 - Use worksheet on page 33



Privacy Issues for Students & Administrators

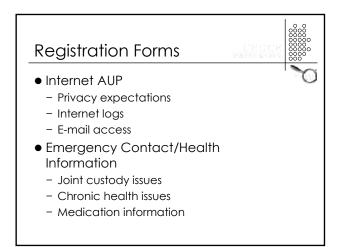


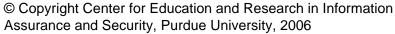
- What forms are signed during registration and the first week of school?
 - Make a list for parent and a separate list for students
 - Use the worksheet on page 34
- If you or a teacher are producing a website, a video clip or seeking publicity, what parent releases are in place?
 - Make a list for your district

Registration Forms



- Review basic student information
 - Emergency contacts
 - Unlisted phone numbers
 - Health information
- Free/Reduced Lunch & Textbook Assistance
 - Direct certification
 - Already on basic student info form





Registration Forms

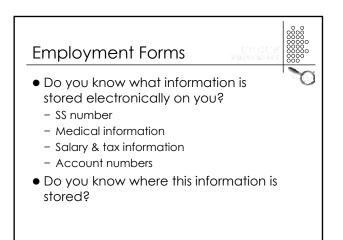


- Computer Use
 - Owner of information in home directory
- Responsibility of login/password

Webmaster Information



- District practice on collecting information via the web site
 - COPA (Child Online Protection Act, 1998)
- Responsibility of release forms before posting
 - FERPA (Family Educational rights and Privacy Act, 1974)



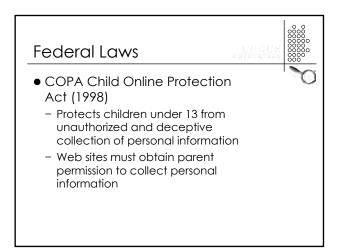
Federal Laws

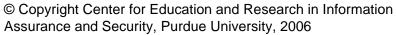


- FERPA Family Education Rights and Privacy Act (1974)
 - Right to annual inspection of educational records
 - Right to not release educational records without written permission
 - Right to not allow "directory information" to be released

• HIPAA Health Insurance Portability and Accountability Act (1996)

- People have the right to control who gets to see their medical information
- Medical information must be kept confidential
- Security measures are in place to protect health information





School Web Site

- Students at Memorial Middle School are asked to respond to an online survey on the building website about a change in the lunch program.
 - Work with a partner
 - List any privacy issues you see from a student's point of view
 - List any privacy issues you see from an administrator's point of view
 - Use worksheet on page 36

Internet Logs



- Students at Apollo High School have all Internet usage logged.
 - Are there any privacy issues from the student's point of view?
 - Are there any privacy issues from the administrator's point of view?
 - Use the worksheet on page 36

Recycled/Repurposed Hardware

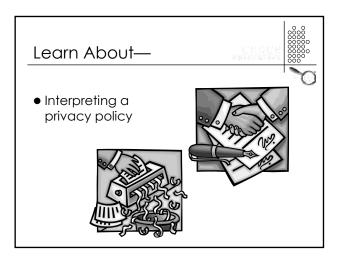
- In order be fiscally responsible, your district recycles obsolete hardware AND moves former administrative hardware into classrooms.
 - Make a list of information that might be on the machines.
 - What steps are currently taken to keep this information private?
 - What privacy risks are you currently taking with this practice?
 - Use the worksheet on page 37

Lost Portable Devices

- An administrator loses his PDA or cell phone
- What information is stored on the lost device?
- What precautions are in place to keep the information private?
 - Use the worksheet on page 37

FASTT Math Reports

- This is a drill & skill software program used to help meet PL 221 and NCLB goals.
- Data is disaggregated by ethnicity, sex, free/reduced lunch, special education, language fluency, and other groups.
 - What privacy risks are created?
 - How do you deal with these risks?
 - Use the worksheet on page 37



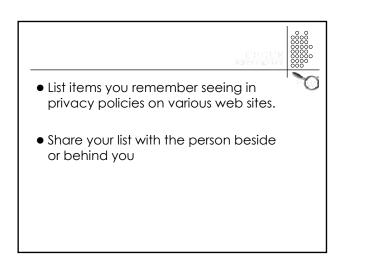
Privacy Policy—What Is It?

• "A privacy policy is a comprehensive description of the information practices of the organization represented by the domain. It is generally located on a website and can be accessed by clicking an indicated link or icon. "[Federal Trade Commission, 1998]

Privacy Policy—What Is It? Part 2



- To inform consumers how their personal information is collected and used
- Used to aid consumers in making informed decisions about their online behaviors



Why Have a Privacy Policy?

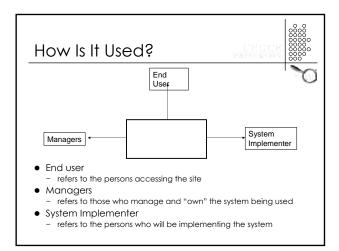


- Cleaner electronic community
 - Help create an environment where consumers are more comfortable and confident
- Laws / legislation may pertain to your business
- Privacy policies show compliance
- Federal Trade Commission (FTC) encourages companies (especially those online) to have a privacy policy

What Is Included?



- Legal rights of user
- What information is collected
- How will the information be used
- How will the information be stored
- How long will the information be kept
- Use of cookies
- Any consent required from user
- Who has access to information





Looking At Privacy Policies

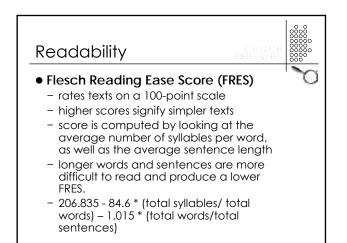


- What items are included in each policy?
- Do you find any gaps?
 - Look at both Amazon (pg. 38) and Nick Jr. (pg. 46)
 - Work with a partner if you wish

Does It Include???



- Legal rights of user
- What information is collected
- How will the information be used
- How will the information be stored
- How long will the information be kept
- Use of cookies
- Any consent required from user



Readability



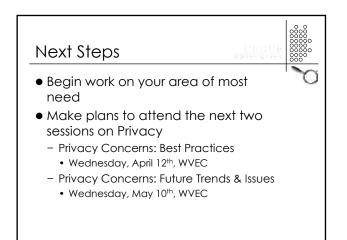
• Flesch Grade Level (FGL)

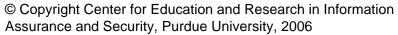
- determines the U.S. grade-school equivalency level of a text
- based on the average number of syllables and sentence length
- (0.39 * Average sentence length (in words)) + (11.8 * Average number of syllables per word) 15.59

Assess Your Privacy Policies



- Look over the scores from your survey
- What area should be the first area of focus?
 - Privacy basics
 - Malware
 - Phising
 - Responsibilities
 - Privacy policies





Concept Definition



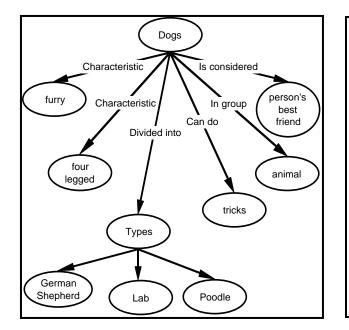
Term—

Characteristics—	
1.	
2.	
3.	
4.	
5.	
6.	

7.

Concept Map





- List broad concepts at top.
- Web out specific items
- Draw connecting lines
- Write words or phrases on the connecting lines which help explain the relationship if needed

Develop a concept map which defines privacy, trust, and security





Information on Hard Drive-

Information in Home Directory on Network-

List ways malware has infected systems in your school/district

What systems and programs seem most at risk?

Phishing Education

Phishing Education Ideas	Information Distribution Options	
Idea to Share—	Method of Distribution—	





Parent Signature Forms	Student Signature Forms

FERPA, CIPA, COPA, HIPAA...

Protecting and defending the growing mountain of critical – and intimate – knowledge about students and staff is not just good academic practice – it's the law. Or rather, laws. Districts must meet a complex set of federally-mandated obligations to protect data, as outlined below. Each law emphasizes different types of protection; in planning to comply with each law, your district will end up devising a safeguard strategy that blends policy, technology, and administrative practices.

Law	Law	Vulnerability / Threat	Strategic Emphasis	Practices				
	Туре		Strategic Emphasis	Policy	Technology	Administrative		
FERPA Family Education Rights and Privacy Act - 1974	Privacy	 Twin Vulnerabilities: unauthorized access or disclosure. Access vulnerabilities: Confidential data, transmitted over Internet in unencrypted format, is intercepted External intruder hacks in Internal scofflaw steals password or hacks in Disclosure vulnerabilities: Authorized users fail to follow rules Staff inadvertently reveals protected data in hardcopy format 	 Secure the borders: stop protected information from getting out - and into the wrong hands with regularly updated and maintained firewall, wireless access protections, etc. Improve internal network security: Create and enforce authentication and authorization policies and procedures for role-based access to data. Encryption: protected data should never be stored or released in an unprotected format. Hardcopy should be in locked cabinets or only given out in sealed envelopes; electronic material should be stored and sent in encrypted format. Many players - one playbook: technology won't protect you if authorized staffs don't know the rules about releasing data or leaving logged-in machines unattended. Train and remind everyone about appropriate practices. 	• Privacy Policies	 Encryption for storage and transmission of data Network security Physical security 	Educational & Training Awareness Programs		
CIPA Children's Internet Protection Act - 2000	Security	 Email: Spam Web: pornography, violent or hate sites Other inappropriate content originating outside - or inside - the network 	 All along the watchtower: Reduce the likelihood that inappropriate information will enter your network with appropriately configured filters. In Particular: review spam filtering methodology regularly. However, the law only requires meaningful effort, not perfection, since there is no foolproof technological solution. The human element: Be public about the inevitability that some inappropriate material will slip through and train students (and staff) how to deal with it. Make sure everyone knows the district's policies and penalties concerning harassment, use of school resources for inappropriate purposes, etc. 	• Usage Policies	 Email filtering Internet filtering 	 Educational & Training Awareness Programs Student Online Supervision 		
HIPAA Health Insurance Portability and Accountability Act - 1996	Privacy	 School nurse or athletic department needs health information. Local public health department may request assistance documenting immunization, 	Get it in writing: A school district can NOT legally be given medical information about a particular person without first receiving HIPAA-required permission. Make sure that parents and staff have given explicit, written permission for you to receive medical data. Once in the district, however, medical info of students falls under FERPA rules.	 Privacy Policies Usage Policies 	 Encryption for storage and transmission of data Network security Physical security 	Educational & Training Awareness Programs		
COPA Child Online Protection Act - 1998	Privacy	• Potentially impacts district web sites or discussion forums that have "open posting" rules.	• <i>Freedom of Speech:</i> Free speech argument tips a Supreme Court injunction 5-4 (June 2004) against implementation. Stay tuned for changing of the guard.	 Privacy Policies 	Internet filtering	 Educational & Training Awareness Programs 		

Case Studies



Activity	Privacy/Student POV	Privacy/Administrator POV	Risks	Actions
Online survey for middle school students				
Internet logs				

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Activity	Privacy/Student POV	Privacy/Administrator POV	Risks	Actions
Recycled/repurposed hardware				
Lost PDA/Cell Phone				
FASTT Math Reports				

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See All 32 Product Categories

Search Amazon.com

<u>Help</u> > <u>Privacy & Security</u> > <u>Privacy Notice</u>

Amazon.com Privacy Notice

Last updated: October 27, 2005. To see what has changed, click here.

Joanne's

Store

Amazon.com knows that you care how information about you is used and shared, and we appreciate your trust that we will do so carefully and sensibly. This notice describes our privacy policy. By visiting Amazon.com, you are accepting the practices described in this Privacy Notice.

- What Personal Information About Customers Does
 Amazon.com Gather?
- What About Cookies?
- Does Amazon.com Share the Information It Receives?
- How Secure Is Information About Me?
- What About Third-Party Advertisers and Links to Other Websites?
- Which Information Can I Access?
- What Choices Do I Have?
- Are Children Allowed to Use Amazon.com?
- Does Amazon.com Participate in the Safe Harbor Program?
- Conditions of Use, Notices, and Revisions
- Examples of Information Collected

What Personal Information About Customers Does Amazon.com Gather?

The information we learn from customers helps us personalize and continually improve your shopping experience at Amazon.com. Here are the types of information we gather.

- Information You Give Us: We receive and store any information you enter on our Web site or give us in any other way. <u>Click here</u> to see examples of what we collect. You can choose not to provide certain information, but then you might not be able to take advantage of many of our features. We use the information that you provide for such purposes as responding to your requests, customizing future shopping for you, improving our stores, and communicating with you.
- Automatic Information: We receive and store certain types of information whenever you interact with us. For example, like many Web sites, we use "cookies," and we obtain certain types of information when your Web browser accesses Amazon.com. <u>Click here</u> to see examples of the



Your Account | Wish List | Help |

Did this page help?

- Yes, I found the information I needed.
- No, this page wasn't helpful.

Contact Us

Contact Customer Service by e-mail. Please use the e-mail address associated with

your Amazon.com account.

By e-mail

Talk to Customer Service by phone.

Provide your phone number and we'll call you right away.

[Note: this feature is currently available for customers in the U.S. and Canada only.]



information we receive. A number of <u>companies</u> offer utilities designed to help you visit Web sites anonymously. Although we will not be able to provide you with a personalized experience at Amazon.com if we cannot recognize you, we want you to be aware that these tools exist.

- E-mail Communications: To help us make e-mails more useful and interesting, we often receive a confirmation when you open e-mail from Amazon.com if your computer supports such capabilities. We also compare our customer list to lists received from other companies, in an effort to avoid sending unnecessary messages to our customers. If you do not want to receive e-mail or other mail from us, please adjust your <u>Customer Communication Preferences</u>.
- **Information from Other Sources:** We might receive information about you from other sources and add it to our account information. <u>Click here</u> to see examples of the information we receive.

What About Cookies?

- Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your Web browser to enable our systems to recognize your browser and to provide features such as <u>1-Click</u> purchasing, <u>New for You</u>, personalized <u>Amazon Honor System</u> greetings, and storage of items in your Shopping Cart between visits.
- The Help portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. However, cookies allow you to take full advantage of some of Amazon.com's coolest features, and we recommend that you leave them turned on.

Does Amazon.com Share the Information It Receives?

Information about our customers is an important part of our business, and we are not in the business of selling it to others. We share customer information only as described below and with subsidiaries Amazon.com, Inc. controls that either are subject to this Privacy Notice or follow practices at least as protective as those described in this Privacy Notice.

• Affiliated Businesses We Do Not Control: We work closely with our affiliated businesses. In some cases, such as Marketplace, zShops, and Auctions sellers, these businesses operate stores at Amazon.com or sell offerings to you at Amazon.com. In other cases, we operate stores, provide services, or sell product lines jointly with these businesses. <u>Click here</u> for some examples of co-branded and joint offerings. You can tell when a third party is involved in your transactions, and we share customer information related to those transactions with that third party.

- Third-Party Service Providers: We employ other companies and individuals to perform functions on our behalf. Examples include fulfilling orders, delivering packages, sending postal mail and e-mail, removing repetitive information from customer lists, analyzing data, providing marketing assistance, providing search results and links (including paid listings and links), processing credit card payments, and providing customer service. They have access to personal information needed to perform their functions, but may not use it for other purposes.
- **Promotional Offers:** Sometimes we send offers to selected groups of Amazon.com customers on behalf of other businesses. When we do this, we do not give that business your name and address. If you do not want to receive such offers, please adjust your <u>Customer</u> <u>Communication Preferences</u>.
- Business Transfers: As we continue to develop our business, we might sell or buy stores, subsidiaries, or business units. In such transactions, customer information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice (unless, of course, the customer consents otherwise). Also, in the unlikely event that Amazon.com, Inc., or substantially all of its assets are acquired, customer information will of course be one of the transferred assets.
- Protection of Amazon.com and Others: We release account and other personal information when we believe release is appropriate to comply with the law; enforce or apply our <u>Conditions of Use</u> and other agreements; or protect the rights, property, or safety of Amazon.com, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction. Obviously, however, this does not include selling, renting, sharing, or otherwise disclosing personally identifiable information from customers for commercial purposes in violation of the commitments set forth in this Privacy Notice.
- With Your Consent: Other than as set out above, you will receive notice when information about you might go to third parties, and you will have an opportunity to choose not to share the information.

How Secure Is Information About Me?

- We work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information you input.
- We reveal only the last five digits of your credit card numbers when confirming an order. Of course, we transmit the entire credit card number to the appropriate credit card company during order processing.
- It is important for you to protect against unauthorized access to your password and to your computer. Be sure to

sign off when finished using a shared computer. <u>Click here</u> for more information on how to sign off.

What About Third-Party Advertisers and Links to Other Websites?

Our site includes third-party advertising and links to other websites. We do not provide any personally identifiable customer information to these advertisers or third-party websites. <u>Click</u> <u>here</u> for some examples as well as information on how to contact these companies to learn more or opt-out of their information collection practices.

These third-party websites and advertisers, or Internet advertising companies working on their behalf, sometimes use technology to send (or "serve") the advertisements that appear on our website directly to your browser. They automatically receive your IP address when this happens. They may also use cookies, JavaScript, web beacons (also known as action tags or single-pixel gifs), and other technologies to measure the effectiveness of their ads and to personalize advertising content. We do not have access to or control over cookies or other features that they may use, and the information practices of these advertisers and third-party websites are not covered by this Privacy Notice. Please contact them directly for more information about their privacy practices. In addition, the Network Advertising Initiative offers useful information about Internet advertising companies (also called "ad networks" or "network advertisers"), including information about how to optout of their information collection.

Which Information Can I Access?

Amazon.com gives you access to a broad range of information about your account and your interactions with Amazon.com for the limited purpose of viewing and, in certain cases, updating that information. <u>Click here</u> to see some examples, the list of which will change as our Web site evolves.

What Choices Do I Have?

- As discussed above, you can always choose not to provide information, even though it might be needed to make a purchase or to take advantage of such Amazon.com features as <u>your Profile</u>, <u>Wish Lists</u>, <u>Customer Reviews</u>, and <u>Amazon Prime</u>.
- You can add or update certain information on pages such as those listed in the "<u>Which Information Can I Access</u>?" section above. When you update information, we usually keep a copy of the prior version for our records.
- If you do not want to receive e-mail or other mail from us, please adjust your <u>Customer Communication Preferences</u>. (If you do not want to receive <u>Conditions of Use</u> and other legal notices from us, such as this Privacy Notice, those

notices will still govern your use of Amazon.com, and it is your responsibility to review them for changes.)

- The Help portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. However, you will not be able to use such important features as <u>1-Click</u> ordering and <u>New for You</u> if you do not use cookies.
- <u>Click here</u> to explore products that offer anonymous browsing. In addition, the Federal Trade Commission provides useful information about online privacy on its own Web site, <u>Site Seeing on the Internet</u>.

Are Children Allowed to Use Amazon.com?

Amazon.com does not sell products for purchase by children. We sell children's products for purchase by adults. If you are under 18, you may use Amazon.com only with the involvement of a parent or guardian.

Does Amazon.com Participate in the Safe Harbor Program?

Amazon.com is a participant in the Safe Harbor program developed by the U.S. Department of Commerce and the European Union. We have certified that we adhere to the Safe Harbor Privacy Principles agreed upon by the U.S. and the E.U. For more information about the Safe Harbor and to view our certification, visit the <u>U.S. Department of Commerce's Safe</u> <u>Harbor</u> Web site. If you would like to contact Amazon.com directly about the Safe Harbor program, please send an e-mail to safeharbor@amazon.com.

Conditions of Use, Notices, and Revisions

If you choose to visit Amazon.com, your visit and any dispute over privacy is subject to this Notice and our <u>Conditions of Use</u>, including limitations on damages, arbitration of disputes, and application of the law of the state of Washington. If you have any concern about privacy at Amazon.com, please <u>contact us</u> with a thorough description, and we will try to resolve it.

Our business changes constantly, and our Privacy Notice and the <u>Conditions of Use</u> will change also. We may e-mail periodic reminders of our notices and conditions, unless you have instructed us not to, but you should check our Web site frequently to see recent changes. Unless stated otherwise, our current Privacy Notice applies to all information that we have about you and your account. We stand behind the promises we make, however, and will never materially change our policies and practices to make them less protective of customer information collected in the past without the consent of affected customers.

Related Practices and Information

- Conditions of Use
- <u>Web-Based Discussion Service Terms of Agreement</u>
- <u>Amazon.com Marketplace, Auctions, and zShops</u>
 <u>Participation Agreement</u>
- <u>Marketplace, Auctions and zShops Account and Community</u> <u>Guide</u>
- Help department
- Shared Purchases
- Your Amazon Home Guidelines

Examples of Information Collected

Information You Give Us

You provide most such information when you search, buy, bid, post, participate in a contest or questionnaire, or communicate with customer service. For example, you provide information when you search for a product; place an order through Amazon.com or one of our third-party sellers; make an Auction bid or purchase; provide information in Your Account (and you might have more than one if you have used more than one email address when shopping with us) or Your Amazon Home; communicate with us by phone, e-mail, or otherwise; complete a questionnaire or a contest entry form; compile Wish Lists or other gift registries; provide employer information when opening a corporate account; participate in Discussion Boards or other community features; provide and rate Reviews; specify a Special Occasion Reminder or a favorite charity in Charity Links; share information with Amazon Friends; and employ other Personal Notification Services, such as Available to Order Notifications. As a result of those actions, you might supply us with such information as your name, address, and phone numbers; credit card information; people to whom purchases have been shipped, including addresses and phone number; people (with addresses and phone numbers) listed in 1-Click settings; e-mail addresses of Amazon Friends and other people; content of reviews and emails to us; personal description and photograph in Your Amazon Home; and financial information, including Social Security and driver's license numbers.

Automatic Information

Examples of the information we collect and analyze include the Internet protocol (IP) address used to connect your computer to the Internet; login; e-mail address; password; computer and connection information such as browser type and version, operating system, and platform; purchase history, which we sometimes aggregate with similar information from other customers to create features such as <u>Purchase Circles</u> and <u>Top</u> <u>Sellers</u>; the full Uniform Resource Locator (URL) clickstream to, through, and from our Web site, including date and time; cookie number; products you viewed or searched for; zShops you visited; your Auction history; and the phone number you used to call our 800 number. During some visits we may use software tools such as JavaScript to measure and collect session information, including page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

Information from Other Sources

Examples of information we receive from other sources include updated delivery and address information from our carriers or other third parties, which we use to correct our records and deliver your next purchase or communication more easily; account information, purchase or redemption information, and page-view information from some merchants with which we operate co-branded businesses or for which we provide technical, fulfillment, advertising, or other services (such as Target.com, BombayCompany.com, and DVF.com); search term and search result information from some searches conducted through the Web search features offered by our subsidiaries, Alexa Internet and A9.com; search results and links, including paid listings (such as Sponsored Links from Google); and credit history information from credit bureaus, which we use to help prevent and detect fraud and to offer certain credit or financial services to some customers.

Third-Party Advertisers and Links to Other Websites

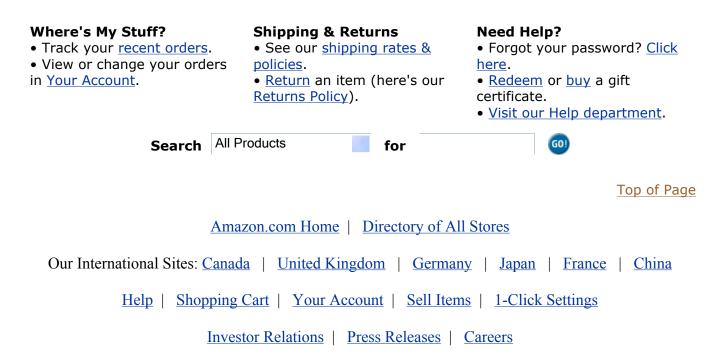
Examples of third-party advertisers and advertising companies that you can link to from the Amazon.com website or that serve advertising content directly to your browser on certain Amazon.com pages include <u>Atlas</u> and <u>Doubleclick</u>. You can find out more about their information collection and use practices, including how to opt out of cookies and other collection techniques that they use, by clicking on the above links to their websites.

Information You Can Access

Examples of information you can access easily at Amazon.com include up-to-date information regarding recent orders; personally identifiable information (including name, e-mail, password, communications preferences, address book, and 1-Click settings); payment settings (including credit card information and gift certificate, gift card, and check balances); email notification settings (including Alerts, Available to Order notifications, Delivers, New for You, Special Occasion Reminders, Weekly Movie Showtimes, and newsletters); recommendations (including recent product view history, prior order history, and Favorites); shopping lists and gift registries (including Wish Lists and Baby and Wedding Registries); Auctions, zShops, and Marketplace seller accounts; and your Profile (including your product Reviews, Requests, and Recommendations, Listmania lists, "So You'd Like to..." guides, personal profile, people you tagged as interesting, and Amazon Friends).

Co-branded and Joint Offerings

Examples of businesses with which we offer joint or co-branded products and other offerings include Toysrus.com, Babiesrus.com, Imaginarium.com, Target, Borders, Waldenbooks, Wine.com, CD Now, Verizon Wireless, Sprint, T-Mobile, Cingular, Hotwire, Shutterfly.com, Office Depot, J&R, Petco, Godiva, Dean & Deluca, Harry and David, FTD, ProFlowers, Avon, Gamestop, Bombay Company, Virginmega.com, Nordstrom, Footlocker, Macy's, Polo, Lands End, and other apparel stores.



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STOP. THINK. Tylenol

HOME



GO TO:

Nick Jr. Home

NICK JR. HOME

- Nick Jr. Shows
- Nick Jr. Magazine
- Member Exclusives
- Message Boards
- My World Stories
- Let's Just Play
- Playful Parent
- Night Kitchen Radio
- Nicktrition
- NickJr.com Help

NICK JR. QUICK SEARCH

Age-by-Age Activities

Make a Selection

Activity Finder

Make a Selection

Nick Jr. Shows

Make a Selection

Message Boards

Make a Selection

Playtime



NickJr.com Privacy Policy Your California Privacy Rights

PARTY

- 📇 Print this page
- Send to a friend

NickJr.com Privacy Policy

NickJr.com is committed to providing quality online activities and information to parents of preschoolers. While we encourage the interactive nature of online media, we strive to promote the online safety and privacy of our users.

Information-Collection Policies

FOOD

NickJr.com's target audience is parents of preschoolers (excluding the Playtime area, which is intended for preschoolers and their parents and which is governed by special information-collection policies--please see below for more on the Playtime area). NickJr.com's design, content, and language, as well as our activities, target a parent audience. We do request personally identifiable information from parents who choose to participate in certain activities available on NickJr.com, as described below. If we were to discover that a child submitted personally identifiable information, NickJr.com would delete the information immediately.

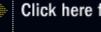
Registered Membership

NickJr.com provides registered membership for our parent audience. In order to participate in our registered member activities, we ask users to submit personal information (e.g. full name, e-mail address, zip code, birthday). All such personal information is collected for the purpose of providing our users access to NickJr.com's registered members activities. Once registered, users can participate in registered member activities such as newsletters, message boards, NickJr.com advisory board (where members will be contacted by NickJr.com for feedback and opinions on various subjects), registered member sweepstakes (refers to those sweepstakes that are open only to registered members; for sweepstakes that are open to all grown-up users, please see "General Activities: Contests and Online Sweepstakes" section below) and "Third Party" offers (the opportunity for registered members to receive information concerning special offers and promotions sent by either NickJr.com on behalf of or in partnership with other third party businesses selected by NickJr.com or directly by such third parties). At any time after the registration process, registered members can choose to discontinue participating in some of the registered member activities (e.g. newsletters, NickJr.com advisory board, "Third Party" offers) or altogether unregister by electing to unsubscribe to such activity, which option can be found at the end of every NickJr.com correspondence sent to users.

Use of Registered Members Information

All information collected during the registration process is used for the purpose of providing our users access to NickJr.com's registered members activities. For instance, if the registered member selected to receive





SHOP

Contains acetaminophen

Meltaways

newsletters, special announcements, offers and promotions from Nickelodeon, we use the information provided by such registered member to send them the requested information which we may send by e-mail and occasionally, by postal mail, for those who have provided us with mailing addresses. The information provided by registered members may also be shared with third parties as more fully described below in "Use and Disclosure of Information" and in the following manner. In connection with registered members who have indicated that they would like to receive "Third Party" offers, NickJr.com may sometimes share and transfer the personal information collected from our registered members with and to third party business partners selected by NickJr.com to promote, sponsor and/or fulfill our "Third Party" offers who will use such information to directly contact and send registered members special offers and promotions provided by the third party business partner. Other times, we on behalf of the third party business partner may send registered members third party special offers and promotions, but only if the registered member has requested such "Third Party" offers.

General Activities

Online Contests and Sweepstakes

NickJr.com offers parents the opportunity to enter contests and sweepstakes. NickJr.com may ask for information such as parent's first name, parent's email address, parent's birth date, child's first name and birth date and in some instances, NickJr.com may collect telephone numbers for certain types of contests. NickJr.com uses this information for purpose of conducting the contests and sweepstakes and does not (except as set forth herein) disclose such information externally to third parties, except with a fulfillment house which NickJr.com uses to help select winners and fulfill prizes and, in some cases, with third-party sponsors. From time to time, NickJr.com may offer contests and sweepstakes sponsored by third party businesses and may share with such third party businesses entrant information collected by NickJr.com, In these types of contests and sweepstakes, NickJr.com will disclose to potential entrants that such information will be so supplied and the identity of the third party to whom such information will be supplied at the time entrant information is collected and will provide potential entrants with the opportunity to opt out of such third party sponsored contests and sweepstakes. However, any information supplied to a third party may be retained by such third party and will be out of the control of NickJr.com. Entrants of NickJr.com contests and sweepstakes have the opportunity to opt-in (by indicating so on the entry form) to become subscribers of the NickJr.com newsletter and to receive other e-mail special announcements and promotions. Please see "Electronic Newsletter and Special Announcements Subscription" below. The personal information collected from those entrants who have chosen to opt-in to the Electronic Newsletter and Special Announcements Subscription shall be maintained by NickJr.com. For those who elect not to opt-in, and/or entrants who have not been selected as winners, NickJr.com will delete personal information collected on the online entry forms from its system, however, personal information collected online from contests and sweepstakes winners may be maintained by NickJr.com and may be shared with third parties for fulfillment purposes, as described above, as well as internally. Entrant's decision not to opt-in will not affect eligibility for contests and sweepstakes and will not impact your chances of winnina.

Electronic Newsletter and Special Announcements Subscription

NickJr.com provides parents the opportunity to receive e-mails containing the NickJr.com Newsletter, along with other Special Announcements pertaining to NickJr.com and/or Nickelodeon. These e-mails will provide subscribers with Nickelodeon information updates, announcements, and promotions. We request no personally identifiable information from the parent except his/her e-mail address, which we use solely for the purpose of sending the e-mails. The e-mail address provided to NickJr.com may be transferred, disclosed, or shared with third parties who may be engaged by us specifically to handle the preparation and delivery of the e-mails and perform other related technical and processing functions. At anytime after the signup process, parents can choose to discontinue their subscriptions to NickJr.com's Newsletter and Special Announcements altogether by electing to unsubscribe, through the unsubscribe option found at the end of each NickJr.com e-mail sent to users.

E-mail

NickJr.com provides parents the opportunity to send e-mail to us. We request no personally identifiable information from the parent except his/her first name and e-mail address, which we use solely for the purpose of responding to questions. The grown-up's first name and e-mail address are deleted from our system periodically.

Electronic Postcards & Games

NickJr.com gives parents the opportunity to send "electronic postcards" to friends and family. We ask the user to submit the first name and e-mail addresses of their friends and family. NickJr.com uses this information only for the purpose of sending the postcards. The friend's e-mail address is deleted immediately from our system.

"Nick Jr. Arcade"

Ordering from the Site and Opening an Account

When customers make purchases through NickJr.com (e.g. games from "Nick Jr. Arcade") other than using the Nick Arcade Game Card (which does not require our customers to enter any personally identifiable information), customers are required to provide us with their full name, billing and/or shipping addresses, e-mail address, and credit card number/expiration date. We also provide our customers the opportunity to send to family and friends gifts items purchased by the customer and will send, on behalf of customers who request it, e-mails to family or friends notifying them that someone has sent them a gift. To do this, we ask customers to provide us with their family or friend's first name and e-mail address. We use this information only to send the gift recipient the item(s) the customer has requested their family or friend receive. During the checkout process, customers are provided the opportunity to receive newsletters, sales and promotions from Nickelodeon. To be removed from the contact list at any time, customers can elect to unsubscribe in the next e-mail they receive from Nickelodeon. If customers do not complete the order process (e.g., fail to enter a valid credit card number/expiration date or fail to complete a purchase transaction) the information customers submitted during the order process will not be captured by our systems. Once customers have successfully entered a valid credit card number/expiration date and completed the order process, an account will be created and maintained for customers. We use this information to process the customer's order and to send order confirmations via e-mail. We also may use this information to send our customers a print catalog based on the information provided. We do not sell, transfer or share the information with third parties except, the information is transferred, disclosed and shared with our third party agent who uses the information solely to handle and manage fulfillment and customer service. Our third party agent is not permitted to use the information for other purposes and the third-party agent has agreed to maintain the confidentiality of such information. We may, from time to time, combine the information from accounts with information received from the Nick Jr. Shop, in which case the account information will be used as described below.

Customer Service

Nick Jr. Arcade customers may e-mail us their questions about the game and our site. Specific questions about the Nick Arcade Game Card should be directed <u>here</u>: Other than an e-mail address, we do not request that users submit any personal information online for customer-service inquiries. We may however ask for additional non-personal information to better help us respond to customer service questions. We use the e-mail address to

communicate directly with customers about technology-related questions, and provide them with answers that they may find helpful. We do not sell, transfer or share the e-mail address with third parties, with the exception that the information is transferred, disclosed and shared with our third party agent who uses the information solely to handle and manage customer service, but cannot use it for other purposes and has agreed to maintain the confidentiality of such information. Once we or our third party agent have had a chance to provide e-mail responses to customer service e-mail questions, the e-mail address is deleted from our system.

"Nick Jr. Playtime" Area

The "Nick Jr. Playtime" area on NickJr.com (the "Playtime area") is an area of our site where parents can enjoy quality online entertainment with their preschool-aged children. This area includes Games, Stories, Music, Art, Shows and other activities, the design, content and language of which are targeted to preschoolers. The Playtime area is fully compliant with the Children's Online Privacy Protection Act of 1998.

It is our policy in the Playtime area to require only the minimal collection of information from our visitors. Consistent with this policy, the Playtime area of NickJr.com limits the collection of information from kids to what is known as non-personally identifiable information (e.g. first name). Other than the collection of such non-personally identifiable information, we do not collect personal information from our users in the Playtime area. As such, we do not share any personal information about our users in the Playtime area with any third parties. In addition, we do not condition a kid's participation in any games or other online activities contained in the Playtime area on the disclosure of more information than is reasonably necessary to participate in the activity. Lastly, we provide a "bumper page" at certain points in the Playtime area of our site to let users know when they are entering an area that is limited to parents and we also provide a "bumper page" when linking from the Playtime area to an advertiser's site or other websites, which may have their own information practices that are different from ours, in order to let users know they are going to an advertiser's site or other websites.

Use and Disclosure of Information

At NickJr.com, we may share non-individual, aggregate information (e.g. non-personally identifiable information) about our users internally within Nickelodeon and externally with third parties, such as advertisers and business partners. We also use personal information collected on our site internally within Nickelodeon, however, it is our policy to not disclose externally with third parties personal information collected on our site, except in the following instances:

Third Party Businesses

From time to time, we may partner with outside third parties to provide you with additional content, products, or services that we believe may be of interest. For example, we may partner with a greeting card company, software manufacturer, or telephone provider to offer you electronic cards, games, or telephone messaging. These partners operate Web sites that are separate and independent from Nick.com and NickJr.com. We receive e-mail addresses from these sites of adults who request to receive information--including newsletters, sales, and special offers--from us. If you do not wish to receive information from Nickelodeon, you can unsubscribe by following the information at the bottom of any newsletter you receive or call us at 212-846-2543 and inform us that you no longer wish to receive correspondence from Nickelodeon.

Agents

The personal information provided to NickJr.com may be transferred, disclosed or shared with third parties who may be engaged by us specifically to handle and deliver certain activities (e.g., message boards, sweepstakes, e-cards, newsletters, advisory board) and perform other technical and processing functions, such as sending postal mail and e-mail, removing repetitive information from registration lists, programming, providing user services to our users, or otherwise operating our site. They have access to personal information needed to perform their functions, but may not use it for other purposes and have agreed to maintain the confidentiality of such information and have agreed to maintain the confidentiality of such information.

Business Transfers

In the event that all or substantially all of the assets relating to NickJr.com are transferred or sold to another entity, personally identifiable information may be transferred to the acquiring entity.

Online Contests and Sweepstakes

In addition to the fulfillment houses to whom NickJr.com may supply personal information collected from contests and sweepstakes entrants for the purpose of helping NickJr.com select winners and fulfill prizes, NickJr.com may supply third-party sponsors with personal information collected from contests and sweepstakes entrants in connection with certain online contests and sweepstakes. In each such case, NickJr.com will disclose to potential entrants that such information will be supplied to a third party, and the identity of such third party, at the time entrant information is collected. Please see "General Activities: Online Contests and Sweepstakes" above.

Special Cases

We may also disclose personally identifiable information to third parties in order to comply with law or requests by law enforcement agencies, to enforce our <u>Terms of Use</u> or to protect the rights, property, or safety of our website, users of our website, and others.

Information Received from www.shop.nickjr.com

The website www.shop.nickjr.com (the "Shop") which is hosted and operated by a third party and is independent and separate from NickJr.com, collects personal information about its users and shares and transfers such information with us. We use the personal information we receive internally within Nickelodeon but we do not sell, transfer, or share this personally identifiable information with third parties except as described in this policy.

From time to time, we may transfer, disclose or share such information with third parties who may be engaged by us specifically to handle and manage certain functions (e.g., fulfilling contests and sweepstakes conducted on the Shop to which we are sponsors). Such third parties have access to personal information needed to perform their functions, but may not use such personally identifiable information for other purposes and have agreed to maintain the confidentiality of any information they receive from us.

We are always looking for ways to improve your shopping experience with Nickelodeon, such as ways to help us offer new Nickelodeon products and services we believe may be of interest to you. In order to accomplish this goal, we may combine and share the personally identifiable information we collect online with information available from other sources including information received from promotional partners, from third-party marketing organizations or other third parties. This information, in addition to the information you have already provided us, will help us to offer new Nickelodeon products and services we believe may be of interest to you. Additionally, in the event that all or substantially all of the assets relating to NickJr.com are transferred or sold to another entity, personal information we received from the Shop may be transferred to the acquiring entity. Finally, we may also disclose personal information about Shop users to third parties in order to comply with law or requests by law enforcement agencies, to enforce the Shop's Terms and Conditions or to protect the rights, property, or safety of the Shop's users and others.

In addition, we may use the personal information received from the Shop to provide you with our print catalog, and to contact those Shop users who have asked that Nickelodeon contact them directly about such things as sales and special offers. To request that we discontinue sending you our print catalog, please contact us at Nick Jr. 1515 Broadway, New York, NY 10036, ATTN: Catalog Manager. To opt out of receiving Nickelodeon Newsletters, please follow the unsubscribe information at the bottom of any newsletter that you receive.

Cookies and Log Data

Cookies are information files that your web browser places on the hard drive of your computer when you visit a website. Cookies cannot damage user files, nor can they read information from a user's hard drive. Cookies allow websites to "remember" users' activities on a website as well as users' visits to a site. At NickJr.com, cookies are used to determine the number of unique visitors to our website over a given period. We do not store any personal information into cookies nor do we link or combine information collected through cookies to any personal information submitted by users when participating in our activities. Log data collected on web servers both within NickJr.com's control and under the control of NickJr.com's third party ad service provider, who is required to maintain such data on a confidential basis, supplies NickJr.com with aggregate information about the number of visits to different pages on our site. NickJr.com uses such aggregate information to improve access to our content based on our visitors' browsers and operating system types to make our content available to as many users as possible. We do not link the "log data" collected to personally identifiable information submitted by users when participating in our activities. For more information about the third party ad service provider and how to "opt out" of the ad serving cookie, please <u>click here</u>.

The ads appearing on NickJr.com are delivered to you by a third party ad service provider. In the course of serving ads, the ad service provider may place or recognize their own unique cookie on your browser, and may use non-personally identifiable information about your visit to NickJr.com, such as the number of times that you have viewed an ad.

Security

NickJr.com has taken steps to ensure that personally identifiable information collected is secure, including limiting the number of people who have physical access to our database servers as well as electronic security systems and password protections which guard against unauthorized access. NickJr.com is intended for domestic visitors and, consequently, is specifically directed towards residents of the United States.

This policy, like the online medium itself, is subject to change. We will notify you of material changes by posting them at our site. We encourage you to check back and review this policy, from time to time, so that you always will know what information we collect, how we use it, and to whom we disclose it.

This page was last updated on February 16, 2005.

If you have any questions regarding NickJr.com's privacy policy, please contact us at:

NickJr.com Privacy Coordinator Nick Jr. 1515 Broadway New York, New York 10036 (212) 846-2543 or e-mail us

Your California Privacy Rights

Beginning on January 1, 2005, California Civil Code Section 1798.83 permits our visitors who are California residents to request certain information regarding its disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an <u>e-mail</u> or write us:

NickJr.com Privacy Coordinator Nickelodeon Online 1515 Broadway New York, New York 10036

▶ PLAYTIME ► TV SCHEDULE	HOME	FOOD	PARTY	TRAVEL	PARENTING	SHOP	NICK Com	
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- Orkut
- Personalized
- **Homepage**
- Personalized Search
- Store
- Talk
- Toolbar
- Web Accelerator

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Google Privacy Policy Highlights

October 14, 2005

At Google we recognize that privacy is important. This document outlines the types of personal information we receive and collect when you use Google's services, as well as some of the steps we take to safeguard information. We hope this will help you make an informed decision about sharing personal information with us.

Scope

This notice offers highlights of the full <u>Google Privacy Policy</u>, which describes in detail the privacy practices that apply to Google's products, services and websites worldwide (collectively, Google's "services"). You can also get more information about the privacy practices for specific Google services in the navigation bar to the left of this notice.

Personal information and other data we collect

- Google collects <u>personal information</u> when you register for a Google service or otherwise voluntarily provide such information. We may combine personal information collected from you with information from other Google services or third parties to provide a better user experience, including customizing content for you.
- Google uses <u>cookies</u> and other technologies to enhance your online experience and to learn about how you use Google services in order to improve the quality of our services.
- Google's servers automatically record information when you visit our website or use some of our products, including the URL, IP address, browser type and language, and the date and time of your request.
- <u>Read more</u> in the full privacy policy.

Uses

- We may use personal information to provide the services you've requested, including services that display customized content and advertising.
- We may also use personal information for auditing, research and analysis to operate and improve Google technologies and services.
- We may share <u>aggregated non-personal information</u> with third parties outside of Google.
- When we use third parties to assist us in processing your personal information, we require that they comply with our Privacy Policy and any other appropriate confidentiality and security measures.
- We may also share information with third parties in limited circumstances, including when complying with legal process, preventing fraud or imminent harm, and ensuring the security of our network and services.
- Google processes personal information on our servers in the United States of America and in other countries. In some cases, we process personal information on a server outside your own country.

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• <u>Read more</u> in the full privacy policy.

Your choices

- We offer you choices when we ask for personal information, whenever reasonably possible. You can find more information about your choices in the privacy notices or FAQs for specific services.
- You may decline to provide personal information to us and/or refuse cookies in your browser, although some of our features or services may not function properly as a result.
- We make good faith efforts to provide you access to your personal information upon request and to let you correct such data if it is inaccurate and delete it, when reasonably possible.
- <u>Read more</u> in the full privacy policy.

More information

For information about specific Google services, please check the relevant privacy notice in the navigation bar to the left. Google is a member of the EU/US Safe Harbor Program.

For more information about our privacy practices, go to the <u>full privacy policy</u>. If you have additional questions, please <u>contact us</u> any time. Or write to us at:

Privacy Matters c/o Google Inc. 1600 Amphitheatre Parkway Mountain View CA 94043 (USA)



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Module 1 End of Module Assessment				Relative	
Criteria	Question	Score	Weight	Score	
	Ŭ,	eing Discussed	1 = No		
<mark>. Privac</mark>	cy Basics				
	1. Does your school corporation separate security and privacy?		0.2	0	
	2. Is there anyone that is responsible for privacy related issues in	the	0.25	0	
	school corporation?				
2 5 0 (3. Does privacy have a line item in the budget?		0.1	0	
25%	4. Is an annual report on the level of privacy compliance issued to	o relevant	0.1	0	
	management?		0.1	0	
	5. Are areas containing sensitive information properly secured?6. Is confidential information properly secured?		0.1	0	
	7. Are passwords and accounts being shared?		0.2	0	
	7. Are passwords and accounts being shared? Total Score		0.05	0	0
	$4 = \text{Yes/Often} \qquad 3 = \text{Sometimes} \qquad 2 = \text{R}$	arely 1 – Na)/Never		0
. Malwa					
• • • • • • • •					
	1. Do your computer systems block or prevent banner ads and "p	op ups"?	0.1	0	
	2. Do your computer systems perform at capacity (not sluggish)?		0.1	0	
	3. Do you have mechanisms to prevent the installation of free and	l share		0	
	programs on your systems?	, share	0.1	0	
	4. Are administers, teachers and staff prevented from downloadir	g and			
	installing software?	8	0.05	0	
	5. Is software downloaded from underground warez sites installed	l on your	0.1	0	
	computer systems?	5	0.1	0	
	6. Do your browser settings remain constant and unchanged (e.g.	the home	0.1	0	
13%	page is never different than the one you set)?		0.1	0	
	7. There are no additional toolbars on your browser?		0.1	0	
	8. You organization has mechanisms in place to ensure that spyw	are does	0.1	0	
	not negatively affect privacy.			0	
	9. Viruses have never negatively impacted your corporation.		0.05	0	
	10. Can you identify the major sources of malware in your corpor	ration?	0.05	0	
			0.00	Ŭ	
	11. Are there any technological solutions in place to mitigate mal	ware on	0.1	0	
	your systems?				
	12. Are your employees aware of the dangers of opening attachm	ents in	0.05	0	
	emails? Total Score				0
		eing Discussed	1 = No		0
. Phishi	j i	ing Discusseu	1 - 110		
	1. Is there any awareness program about phising attempts that mi	oht be			
	relevant to your corporation?	5 00	0.2	0	
	2. Do you think your employees are able to detect phising attemp	ts?	0.2	0	
	3. Have phishing attacks caused privacy or security problems for				
12%	organizations in the past year	J	0.2	0	
	4. Do you block executables?		0.1	0	
	5. Do you block HTML transmitted through email?		0.1	0	
	6. Are you a subscriber to any of the popular phising scams corpo	orations			
	(ebay, chase, etc)?		0.2	0	

	4 = Yes 3 = Being Implemented 2 = Being Discussed	1 = No	
D. Resp	onsibility		
	1. Do you encourage your staff and students to read the privacy statements on websites before registering on it?	0.05	0
	2. Do you encourage your staff and students to share their personal information only after reviewing privacy statements?	0.05	0
	3. Are employees trained to be cognizant of privacy matters?	0.05	0
	4. Is access to sensitive/confidential information by contractors monitored?	0.05	0
	5. Do employees receive training on privacy relative to their experience and responsibilities?	0.1	0
	6. Are employees receiving both positive and negative feedback related to	0.05	0
	privacy on their performance evaluations?		0
	7. Are administrators given additional privacy specific training?	0.1	0
25%	8. Is there a regular privacy awareness program in place (newsletter, etc)?	0.1	0
	9. Are audit logs or other reporting mechanisms in place for systems containing sensitive information?	0.1	0
	10. Are violations to privacy tracked?	0.05	0
	11. Are procedures in place for the proper disposal of confidential information?	0.05	0
	12. Are unsecured and temporary accounts restricted to sensitive information and disabled in a timely fashion?	0.05	0
	13. Have employees been trained on proper password management?	0.05	0
	14. Are permissions being properly set (only those who need the information have access to it)?	0.05	0
	15. Are users of all network resources required to change the initial default password?	0.05	0
	16. Are Access Control Lists maintained on a regular basis?	0.05	0
	Total Score	0.03	0
	4 = Yes 3 = Being Implemented 2 = Being Discussed	1 = No	V
E. Priva	cy Policies		
	1. Do you have a website?	0.05	0
	If the answer to Q1 is yes continue below If the answer is no, go to Q17		
	2. Does your website target group include children under 13?	0.05	0
	3. Does your website collect email addresses?	0.05	0
	4. Does your website collect personal identifying information other than email address (name, address, telephone number, credit card number, social security number)?	0.05	0
	5. Is there a privacy policy for your website?	0.2	0
	If the answer to Q5 is yes continue below If the answer is no, go to Q16	0.2	0
	6. Does the Privacy Policy state anything about what specific personal	0.1	0
	information is collected?	0.1	Ŭ
	7. Does the Privacy Policy state how the website may use personal information it collects for internal purposes?	0.05	Ο
	8. Does the Privacy Policy state anything about the website's use of personal information collected to send communications to visitors?	0.05	0
	personal information confected to send communications to visitors?		

	10. Does the Privacy Policy say whether the website allows users to			
	review, modify and delete some of the personal information collected	0.05	0	
	about them?			
25%	11. Does the Privacy Policy say what measures the website takes to provide security?	0.05	0	
	12. Does the Privacy Policy say what measures are taken to provide security for personal information during the transmission from the consumer to the website?	0.05	0	
	13. Does the Privacy Policy say what measures are taken to secure personal information after it has been collected?	0.1	0	
	14. Does the Privacy Policy say whether the website places cookies or not?	0.05	0	
	15. Does the Privacy Policy say whether third parties may place cookies or collect personal information on the website?	0.05	0	
	16. Does your corporation have any plans to develop a privacy policy for your website?	0.6		
	17. Do you have a document that describes the type of information collected in your corporation?	0.2		
	18. Do you have a policy that documents the privacy practices of your corporation?	0.3		
	19. Do information providers have any options when disclosing information?	0.2		
	20. Do you have a policy that states the right to disclose personal information to third parties?	0.2		
	21. Do you have a policy that states how sensitive information collected is stored and secured?	0.1		
	Total Score			0





General references—

Bishop, Matthew	Computer Security: Art and Science Addison- Wesley, 2003.ISBN 0-201-44099-7
Electronic Privacy Information Center	http://www.epic.org/
Online Privacy Alliance	http://www.privacyalliance.org/resources/ ppguidelines.shtml
Privacy.org	http://www.privacy.org/
The Privacy Place.org	http://www.theprivacyplace.org
The Privacy Rights Clearinghouse	http://www.privacyrights.org/fs/index.htm #English

Example privacy policies to use with professional development activities—

Amazon.com	//www.amazon.com/exec/obidos/tg/browse/- /468496/103-8441272-3347065
AmazonPrivacyPolicy.pdf	
Nick Jr.	//www.nickjr.com/home/privacy_policy.jhtml
NickJrPrivacyPolicy.pdf	
AOL	//about.aol.com/aolnetwork/aol_pp
AOLPrivacyPolicy.pdf	
Google	//www.google.com/privacy.html
GooglePrivacyPolicy.pdf	

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