Content Analysis of Privacy Policies for Health Social Networks
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CONTENT ANALYSIS OF PRIVACY POLICIES FOR HEALTH SOCIAL NETWORKS

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For my parents, sister and close friends who have always given me unconditional love

and support. This is for the wonderful and positive influence that you all have had on me.

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ABSTRACT

Savla, Pratik. M.S., Purdue University, August 2011. Content Analysis of Privacy Policies for Health Social Networks. Major Professors: Victor Raskin and Michael Kane.

The Web is an important resource for health information. Pew's Internet and American Life Project found 62% of adult Web users looking for health-related information on health social networks. However, the National Survey on Identity and Privacy in Social Media by The Ponemon Institute reported that about 56% of adult users were anxious about the privacy of their personal information on social networks. This study examines the privacy policies of 35 online social network sites selected based on the U.S. users' traffic. The objectives of this research are to determine the extent to which privacy policies of online health social networks comply with the principles of Fair Information Practice (FIP) and to evaluate the readability and accesssibility of policies. To measure the readability of the policy statements, the Flesch Reading Ease Score and Flesch Kincaid Grade Level score metrics are used. The findings indicate that 9% of the websites in the sample had no privacy policy posted, and only about 26% of the websites in the sample fully complied with the FIP. The findings show that compliance with the FIP principles is poor, and confirm that most policies require a reading skill higher than the Internet population's average literacy level.

CHAPTER 1 INTRODUCTION

1.1 Introduction

Health social networks are models of online platforms where people meet to share

health-related information and their experiences. In addition to serving as an abundant

source of information, health social networks are popular on account of the emotional

factor that also comes into play by affording the ability to interact with people with

similar experiences. The increasing popularity of such social networks has resulted in a

large number of users putting their personal information online. While there are

undoubtedly several advantages that such type of social networking offers, there is also a

concern with regard to what extent the privacy of users of such networks is actually being

protected. The privacy policies of such networks are supposed to detail information

regarding how a users' personal information is dealt with. The policies usually provide

details of what type of personal information is collected, how that information may be

used, to whom that information may be disclosed and the various security measures taken

to protect the personal information (Tuunainen et. al, 2009). This research proposes to

demonstrate the extent to which privacy policies of health social networks comply with

the principles of FTC's Fair Information Practice as well as to evaluate the readability

and accessibility of the policies using content analysis methodology.

1.2 Statement of the problem

This research focuses on the following research questions:-

1. Do the privacy policies of health social networks conform to the FTC's FIP principles?

2. How readable are the privacy policies of the health social networks?

3. How accessible are the privacy policies of the health social networks?

The first and the third research questions were addressed using content analysis method and the second one was addressed partly by using Flesch Kincaid Readability index and partly by content analysis method.

1.3 Statement of Purpose

Many researchers have defined Content Analysis as a systematic, replicable method for compressing many words of text into fewer content categories based on definite rules of coding (Berelson, 1952; Krippendorff, 1980; Weber, 1990). To date, content analysis of privacy policies has been conducted for many segments of healthcare domain such as general reference websites, health insurance, online drugstores and pharmaceuticals. This study is novel as it involves content analysis of privacy policies for health social networks. The privacy policy statement informs the user of the group's privacy practices and of the choices one can make about the way the information is collected, used and secured online. This statement is generally linked on the group's website home page and is found usually at the bottom of the page. Fair Information Practice (FIP) principles are a group of internationally recognized principles for addressing the privacy of information about individuals (Gellman, 2011). The five core principles of privacy protection are Notice/Awareness, Choice/Consent,

Access/Participation, Integrity/Security, and Enforcement/Redress (FTC, 2007). These

principles serve as recommended items or guidelines that a privacy policy statement

should address. To accomplish the main objectives of this research, that is, determining

the extent of compliance with FIP as well as the degree of readability and accessibility of

the privacy policies, the following approach is utilized. First, the study examines the

health social network websites to be considered as most frequently used in terms of users'

traffic and thus most significant for privacy protection. Second, the study determines how

many such websites' policy statements address all or some principles and to what extent.

Third, the study determines how readable and accessible the privacy policies of health

social networks are. The research involves the usage of the Conceptual Content Analysis

methodology and hopes to illustrate that there is a clear need for determining the degree

of compliance of the policies to the FIP principles as well as to gauge the readability and

accessibility of the policies in case of health social networks to protect users' privacy

rights.

<u>1.4 Significance of the problem</u>

Rapid advancements in technology have heralded the information age with more

than 20% of the world's population (on an average) having access to the Internet; the

numbers stand at about 78.3% in the United States as of 2011 statistics (Stats, 2011). This

revolution has made information that was previously difficult to access, easily available

to a large number of people via the Internet. One of the sectors that has benefited from

this advancement is the health sector as evidenced by the growing number of people

relying on the medium for information. A new survey conducted by the Pew Research

Center's Internet and American Life Project and the California HealthCare Foundation

reported that in the U.S., 80% of Internet users looked for health information online (Fox,

2010). Another survey conducted by Pew's Internet and American Life Project in

February (2011) found 62 percent of adult Internet users looking for health-related

information on health social networks. It clearly illustrates the growing significance of

online health social networks. Thus, one primary area of concern pertains to the privacy

of users accessing the groups for health purposes. The National Survey on Identity and

Privacy in Social Media conducted by The Ponemon Institute (2010) reported that only

about 8% of users read privacy policy statements and about 66% stated that they had less

control over their personal information on social networks. It can be seen that information

privacy is a matter of concern in the area of health social networks, especially when one

is dealing with the personal information. This clearly attaches significance to the contents

of privacy policies and their coverage of the FIP principles.

1.5 Defintions

Personal Health Information - It generally refers to demographic information, medical

history, test and laboratory results, insurance information and other data that is collected

to identify an individual and determine appropriate care (Terms, 2010)

Personally Identifiable Information – It refers to information that can be used to

distinguish or trace an individual's identity, such as name, Social Security Number,

biometric records, etc. alone or when combined with other personal identifying

information which is linked or linkable to a specific individual, such as date of birth,

mother's maiden name, etc (ITA, 2011).

Non-Personal Information – It is information that, alone, cannot be used to identify a user. It refers to gender, age, IP addresses, data stored in cookies etc. (WFN, 2011)

Cookie – It is a small data file created by a web site visited by the user that is stored on their computer either temporarily for that session only or permanently on the hard disk. It provides a way for the web site to recognize the user and keep track of their preferences (PCMag, 2011).

Opt-in- It means to purposefully accept some situation or condition ahead of time. For example, to opt-in to an electronic mailing list implies that one wants to receive periodic newsletters or information, which may include advertising from the publisher or third parties (PCMag, 2011).

Opt-out – It means to unsubscribe from a list or group. In the context of social networks, it could involve not selecting a checkbox corresponding to a stated preference or taking some action to indicate one's preference to not participate in a program. (Singley, 2010)

1.6 Assumptions

Some assumptions of this work are as follows:

- The target dataset is privacy policies of health social networks.
- The policies are content analyzed using a pre-defined coding plan.
- The sample size of 35 privacy policies chosen is sufficient in concluding about the compliance of the statements with the Fair Information Practice principles as well as in evaluating the readability and accessibility of the policies.

1.7 Limitations

The limitations of the study can be stated as follows:

- The dataset used is connected with the healthcare industry.

- The websites considered are chosen by being ranked according to the 'Unique Visitor' metric of Compete.com - a traffic estimation service.

- Using Compete.com would entail only considering traffic from the U.S. users.

- Only the five core principles of the Fair Information Practice (FIP) are used as a benchmark for determining compliance.

- Only the health social networks segment of the healthcare industry is focused on and focus is on 35 privacy policies.

- The readability of the content of the privacy policies is measured using only the Flesch-Kincaid Reading metric.

- The study primarily focuses on addressing the issue of user privacy of personal information.

1.8 Delimitations

- Only privacy policy statements for health social networks are covered. Policy statements concerning other domains within the healthcare field that are also vulnerable to the risk of information privacy violation are not studied.

- Only informational privacy is analyzed. Other forms of privacy concerns such as physical privacy, organizational privacy etc. is not looked into.

- Only existence and frequency of concepts in the statements is established (conceptual analysis; a sub-category of content analysis) when analyzing the content of the privacy policy statements. Examining the relationships among concepts in a text (relational analysis; another sub-category of content analysis) is not performed.

1.9 Summary

This chapter provided a primer into the research conducted. The problem statement was introduced followed by the statement of purpose and the significance of the problem. Some important terms that would be used extensively in this work were defined. The chapter was concluded by giving the assumptions, limitations, and delimitations that further explained the scope of the research while explaining topics that would not be touched upon.

CHAPTER 2 LITERATURE REVIEW

2.1 Introduction

The study is novel as it involves the content analysis of privacy policies of health

social networks. Threat to privacy of personal information in the social media has been a

matter of concern and is widely discussed. The thesis would primarily focus to

demonstrate the extent to which privacy policy statements of health social networks

comply with the principles of FTC's Fair Information Practice as well as measure the

readability and accessibility of the policies. The significance of content analysis of

privacy policies is discussed by Rains and Bosch (2009). The acknowledgement by the

authors that a content analysis of privacy policy statements of healthcare-related websites

reveals enlightened practices in relation to the collection and use of consumers' personal

data forms the basic motivation of my thesis.

2.2 General reference health websites

Rains and Bosch (2009) performed a content analysis of the privacy policy

statements (PPSs) from 97 general reference health Web sites to examine the ways in

which visitors' privacy is constructed by health organizations. They chose their target

group because they claimed that such health websites (e.g., medlineplus.gov, webmd.com)

contain information about a variety of health topics and are a widely-used resource for

health-related inquires. Exchange theory and, in particular, the notion of a secondary

exchange were offered as a theoretical foundation for the analysis. Besides evaluating the content of the PPS's, the use of justifications for collecting information were examined as rhetorical strategies used to encourage visitors to disclose personal information in exchange for access to the site. They reported that over 80% of the PPSs in the sample indicated automatically collecting or requesting that visitors voluntarily provide information about themselves, and only 3% complied with all five of the Federal Trade Commission's Fair Information Practices guidelines. Also, they reported that the manner in which PPSs were framed and the use of justifications for collecting information were tropes used by such organizations to foster a secondary exchange of visitors' personal information for access to Web site content. The results of the analyses indicated that the PPSs in the sample did not closely follow the FTC's Fair Information Practice principles.

2.3 HIPAA's impact on privacy policies

Anton *et. al.* (2004) investigated the online privacy practices of three categories of healthcare websites - pharmaceuticals, health insurance companies and online drugstores - and analyzed 24 online privacy documents from nine institutions using a content analysis technique called goal-mining. Her study involved reporting on the state of privacy practices before and after HIPAA's enactment. The authors described goal-mining as the extraction of goals from data sources by the application of goal-based requirements analysis methods. In the study, goals were extracted by detecting action verbs in policy statements. Identified goals were classified either as privacy protections or vulnerabilities. The authors classified all the FTC's 5 principles as privacy protection goals. The following were the findings of the study:-

- Information transfer practices were more common post-HIPAA.

- Notice and awareness as well as integrity and security practices were more common post-HIPAA.

- Consumers still had very little control over their personal information.

- HIPAA yielded a greater number of unique privacy statements, making it more difficult to compare different organizations' practices.

- Healthcare privacy policy documents were now more difficult to comprehend.

- Healthcare institutions were employing deeper linking post-HIPAA.

- Lengthier and more numerous privacy policy documents increased the burden on consumers.

- HIPAA caused a shift in the content emphasis in the policies of different healthcare Web site categories.

The authors reported that although HIPAA's enactment resulted in more detailed and descriptive policies, it also lead to an increased lack of readability and clarity of the same policies. The study provided a unique perspective on the state of privacy practices in 9 online healthcare organizations before and after HIPAA's enactment. The results of such analysis could be helpful for predicting how future legislation would affect the state of online privacy in other areas. The authors suggested in their summary that the USA required "additional non-domain-specific legislation that broadly regulated online privacy and which protected the consumer rather than the institution".

2.4 Analyzing online privacy policies within the context of user privacy values

Earp's paper (2005) compared the classes of privacy protection goals and vulnerabilities with consumer privacy values. It involved using privacy policies from nearly 50 websites and surveying over 1000 Internet users. The authors used a purposeful sampling startegy to choose 23 highly visited health care websites for data analysis in this study. Rather than doing a high-level policy analyses, they conducted a content analysis by inspecting each individual policy statement, breaking it down into sentences and words, instead of considering the overall meaning that flowed from the policy. Also, instead of using the 5 princples of the Fair Information Practice as categories, the authors developed and used 12 categories in the taxonomy which they described either in terms of Privacy-Protection or Privacy-Vulnerability. Such a study has several implications to privacy managers and software project managers. Results from this study can help managers determine the kinds of policies needed to both satisfy user values and facilitate privacy-aware website development efforts. The authors concluded that the FIP principles provided an incomplete basis for developing and analyzing privacy-policy statements as many website statements lay outside of the FIP principles. The study serves as a first step toward proactive privacy management by managers and software professionals. The authors stated that by a careful evaluation of their own organization's website and privacy policy using the different categories of the privacy taxonomy, managers and software professionals could identify potential problems with the visible website privacy-policy statement.

<u>2.5 Privacy Policies as Decision-Making Tools</u>

Jensen and Potts (2004) evaluated the usability of online privacy policies, as well as the practice of posting the policies. They analyzed accessibility, writing, content and evolution of 64 privacy policies from high-traffic websites and health-care websites. They examined how well those policies met user needs and how they could be improved. They concluded that users should check the privacy policy of every site they visit, and re-check it every time they visit the site, if they are sincere about protecting their privacy. Not doing so would imply that the user has implicitly agreed to different conditions and practices for information that has been collected by the website or the one that the website collects. The authors also emphasized that the HCI community should contribute significantly in improving current privacy awareness and management techniques. They concluded that a lack of significant usability improvements would constrain the users from effectively take charge of their own information and protection, irrespective of their motivation.

<u>2.6 Customer privacy on UK healthcare websites</u>

The previous studies focused mainly on US-based healthcare websites. The following study involved the analysis for specifically UK-based healthcare websites. Mundy (2006) analysed privacy policies on popular UK healthcare-related websites to determine consumer privacy protection. He combined approaches (approaches focused on usability, policy content, and policy quality) used by other researchers on e-commerce and US healthcare websites to provide a comprehensive analysis of UK healthcare privacy policies. He reported that only 61% of healthcare-related websites in his sample

group posted privacy policies. Also, most of the posted privacy policies had poor

readability standards and included a number of privacy vulnerability statements. He

stated that the most popular of the online privacy protection initiatives was the growth in

the display of privacy policies on websites. He highlighted the significance of privacy

policies as facilitating the users in making an informed choice about their use of websites

and the submission of personally identifiable information within websites. However,

Mundy also stressed about certain problems with privacy policies such as lack of

uniformity and lack of standards. He stated that although the Platform for Privacy

Preferences Project (P3P) ensures uniformity of privacy policy construction, it only

facilitates in expressing the organization's intent but not its practice. Even privacy seals

such as TRUSTe and WebTrust caused more confusion as each seal differed in its

practice and stringency of practice. His was one of the first comprehensive studies of UK-

based healthcare-related websites. He pointed out that the healthcare research performed

in the USA as well as the introduction of new regulations, helped drove forward positive

changes in relation to privacy policy on USA-based healthcare-related websites. He

emphasized that raising awareness of the results from research would lead to positive

changes in the healthcare industry.

2.7 Comparison of UK and USA Healthcare Web Privacy Policy Management

Another study by Mundy (2009) investigated practices in the UK and USA related to

web privacy policy. He reported that such a comparison would bring a unique

perspective on privacy policy management in the two countries and help to identify

privacy policy management challenges for healthcare organizations. The study made the following key observations.

- After the implementation of HIPAA, USA healthcare websites contained greater amounts of protection and vulnerability goals than their UK counterparts.

- Commonalities existed with regards to practices of concern to consumers and consumer control of personally identifiable information.

- Healthcare privacy policies were more difficult to comprehend on USA healthcare websites.

- UK healthcare websites privacy policies were presently less complex and more accessible than their USA equivalents.

- Examples of practice not matching policy occurred across the entire subset of UK and USA policies examined.

The author concluded that both UK and USA based healthcare organisations could reveal more information about their organisational privacy practice. The study reported that UK-based organisations provided limited amounts of information about security protection measures and USA-based organisations provided limited amounts of information about notice/awareness. Also, it pointed out that HIPAA caused an increase in information transfer vulnerability goals but confined increases to other vulnerability areas. Additionally, the author offered two solutions to the problem of highlighting practices of concern on healthcare organisations websites; 1) education and awareness raised through such studies and 2) through improved automation for privacy preference matching to privacy policies. The study suggested that global standardisation of privacy policy practice and automated control of user privacy preferences would be the best next

step forward. Mundy's study provided a unique perspective on privacy policy management in the USA and UK and facilitated in identifying privacy policy management challenges for healthcare institutions globally.

Through the literature review, it can be concluded that the aim of this thesis is to find the degree of compliance of the privacy policy statements to the FTC's Fair Information Practice (FIP) principles and in turn the impact of FIP in case of health social networks as well as to evaluate the readability and accessibility of the policies. There is also an effort to find a way by which content analysis of privacy policies for health social networks can be performed better.

2.8 Summary

This chapter went through the existing studies that demonstrated content analysis of privacy policies for different types of healthcare organizations. It also highlighted papers that value the role played by content analysis in effective examination of the user privacy protection issues. This topic can be a detailed and independent research on its own.

CHAPTER 3 METHODOLOGY

3.1 Study Design

This work is both a qualitative and quantitative study employing an experimental

design.   There are no human subjects involved. The hypotheses are:

Null Hypothesis 1: The privacy policy statements (PPS) of online health social networks

do not conform to the FTC's Fair Information Practice principles for PPSs.

Alternate Hypothesis 1: The privacy policy statements (PPS) of online health social

networks do conform to the FTC's Fair Information Practice principles for PPSs.

Null Hypothesis 2: The privacy policy statements (PPS) of online health social networks

are not readable.

Alternate Hypothesis 2: The privacy policy statements (PPS) of online health social

networks are readable.

Null Hypothesis 3: The privacy policy statements (PPS) of online health social network

are not accessible.

Alternate Hypothesis 3: The privacy policy statements (PPS) of online health social

networks are accessible.

3.2 Variables Measured

The unit analyzed in this study is the privacy policy of the health social network. The quantity measured is the extent of conformance to the FTC's Fair Information Practice principles as well as readability and accessibility.

The major variables for this study are enlisted as follows:

Independent Variable1: Extent of representation of the Fair Information Practice principles

Dependent Variable1: Status of health information privacy

Independent Variable2: Degree of ease of reading the privacy policies

Dependent Variable2: Status of policy readability

Independent Variable3: Degree of ease of accessing the privacy policies

Dependent Variable3: Status of policy accessibility

3.3 Content Analysis

Content Analysis has been defined as any approach for making inferences by objectively and systematically identifying defined attributes of contents (Holsti, 1969). It is generally considered as a flexible way of obtaining information. Even though it was earlier applied to only a very large magnitude of data, content analysis is also quite effective in gathering specific information about a limited data set. To date, content analysis of privacy policies has been conducted for many segments of healthcare domain such as general reference websites, health insurance, online drugstores and pharmaceuticals. As a methodology, content analysis has proved to be very effective in obtaining results. Its significance can be judged just from the study conducted by Rains

and Bosch (2009) that involved examining privacy policy statements of 97 general reference health websites. The authors acknowledged that the content analysis of privacy policy statements revealed enlightened practices with respect to the collection and use of users' personal information.

3.4 Site Selection

The study selected 35 health social networks based on the U.S. users' traffic. To come up with that sample, the following approach was used. Firstly, it was determined whether a website could be classified as a health social network based on certain features of the site. Features such as user profile creation, user search, group creation, contact list compilation, picture/video upload, and message-based communication were considered as part of the classification criteria. Secondly, once the classification was completed, Compete.com was used to estimate the rank of every website. Compete.com is web traffic analysis service that has a Site Analytics service component to determine the traffic volume and ranking for all the websites (Compete). The ranking metric used by Compete.com is based on "Unique Visitors". The metric only counts a user once irrespective of how many times they visit a site in a particular month. However, it does not count page views or number of visits made to the site. Thirdly, after the completion of the ranking process, the websites were arranged in an ascending order and the top 35 websites were selected based on their rank. All the sites in the sample were still active as of 10th July 2011. Table 1 provides a listing of all the websites considered in the sample. The time limitations of the thesis made it infeasible to identify the whole population dataset and thus only a significant sample size was chosen, the results from which can be generalized to the entire health social network industry.

Table 3.1 Names and Address of all the Health Social Networks

	Name of the Health Social Network	Web Address
1	WebMD	http://www.webmd.com/
2	Health Grades	http://www.healthgrades.com/
3	MedHelp	http://www.medhelp.org/
4	CaringBridge	http://www.caringbridge.org/
5	Health Boards	http://www.healthboards.com/
6	Health Central	http://www.healthcentral.com/
7	Diabeticconnect	http://www.diabeticconnect.com/
8	dLife	http://www.dlife.com/
9	Psychcentral	http://psychcentral.com/
10	Wellsphere	http://www.wellsphere.com/home.s
11	Carepages	http://www.carepages.com/
12	Revolution Health	http://www.revolutionhealth.com/
13	FatSecret	http://www.fatsecret.com/
14	MDJunction	http://www.mdjunction.com/
15	TUDiabetes	http://www.tudiabetes.org/
16	Sermo	http://www.sermo.com/
17	WEGOHealth	http://www.wegohealth.com/
18	iMedix	http://www.imedix.com/
19	rVita	http://www.rvita.com/
20	Healia	http://www.healia.com/
21	StopaFib	http://www.stopafib.org/
22	Daily Strength	http://www.dailystrength.org/
23	HealingWell	http://www.healingwell.com/
24	Inspire	http://www.inspire.com/
25	Organized Wisdom	http://organizedwisdom.com/Home
26	Nami	http://www.nami.org/
27	FacetoFace Health	http://www.facetofacehealth.com/
28	Rareshare	http://www.rareshare.org/
29	NewMediaMedicine	http://www.newmediamedicine.com/forum/content/
30	PeopleJam	http://www.peoplejam.com/
31	Icyou Health	http://www.icyou.com/
32	Juvenation	http://juvenation.org/p/juvenation_welcome.aspx
33	Obesity Help	http://www.obesityhelp.com/
34	Medical Mingle	http://www.medicalmingle.com/
35	Doctorshangout	http://www.doctorshangout.com/

<center>3.5 Coding</center>

Coding performed in content analysis method is identical to coding performed in a survey. Basically, it involves placing answers into different groups, thus reducing the number of different answers to make comparisons easier. The following approach was used to develop the coding plan. Firstly, the level of content to be analyzed i.e. in this case looking for words, sentences and themes was established. Secondly, a coding structure based on the 5 principles of Fair Information Practice, where every principle was considered as a unique variable was framed. Thirdly, comprehensive number of questions was formulated based on the definitions of the 5 principles. Fourthly, a coding scale for answering every question was devised. Certain questions were based on Yes/No values and the other remaining questions had more than two options. The coding was conducted by reading through the text and manually noting relevant occurrences. Software tool was not used for the study as there were no strict set of categories. Hence, the coding process was time-intensive. For answering the questions, the "at least-some" rule was considered, which considers an activity true even if it is carried out only once in a while.

<center>3.6 Levels of Compliance</center>

The classification of the levels of compliance formulated by Schwaig et. al (2005) was modified and expanded. For examining the extent to which the privacy policy addressed the various aspects of FIP, the coding scheme was divided into two main classes, depending upon the level of compliance such as Full and Partial.
The following is the description of the levels of compliance with the FIPs:

a) **Partial notice**: The privacy policy mentions at least one of the following:

(1) whether there is a link to the privacy policy statement/notice on the home page.

(2) where is the policy link positioned on the webpage.

(3) whether the site provides a link to a privacy policy on all pages collecting PII.

(4) whether the policy mentions about the type of personal information collected.

(5) whether the policy specifies the purpose for collecting the user's PII.

(6) whether the policy tells the user about any tracking information collected

(7) what is the site's retention policy for the user's PII

(8) whether the site would share/sell information with/to its subsidiaries/other groups.

b) **Full Notice**: The privacy policy mentions all of the following:

(1) whether there is a link to the privacy policy statement/notice on the home page.

(2) where is the policy link positioned on the webpage.

(3) whether the site provides a link to a privacy policy on all pages collecting PII.

(4) whether the policy mentions about the type of personal information collected.

(5) whether the policy specifies the purpose for collecting the user's PII.

(6) whether the policy tells the user about any tracking information collected

(7) what is the site's retention policy for the user's PII

(8) whether the site would share/sell information with/to its subsidiaries/other groups.

c) **Partial Choice**: The privacy policy mentions at least one of the following:

(1) whether the site provides opt-in consent for all information collection and usage as well as ability to opt out of receiving any email based newsletters or product offerings.

(2) whether the user can opt-out by changing settings within his/her profile.

(3) whether the user can opt-out by email.

(4) whether the user can opt-out by regular mail.

d) **Full Choice**: The privacy policy mentions all of the following:

(1) whether the site provides opt-in consent for all information collection and usage as well as ability to opt out of receiving any email based newsletters or product offerings.

(2) whether the user can opt-out by changing settings within his/her profile.

(3) whether the user can opt-out by email.

(4) whether the user can opt-out by regular mail.

e) **Partial Access**: The privacy policy mentions at least one of the following:

(1) whether the user can review/change the information through his/her account.

(2) whether the user can review/change the information by email.

(3) whether the user can review/change the information by regular mail.

f) **Full Access**: The privacy policy mentions all of the following:

(1) whether the user can review/change the information through his/her account.

(2) whether the user can review/change the information by email.

(3) whether the user can review/change the information by regular mail.

g) **Partial Security**: The privacy policy mentions at least one of the following:

(1) whether the policy provided cues or discussed about any security controls.

(2) if yes for (1), what type of controls are used.

(3) what type of user authentication mechanism is used.

(4) whether the site maintains any audit trails.

h) **Full Security**: The privacy policy mentions all of the following:

(1) whether the policy provided cues or discussed about any security controls.

(2) if yes for (1), what type of controls are used.

(3) what type of user authentication mechanism is used.

(4) whether the site maintains any audit trails.

i) **Partial Enforcement**: The privacy policy mentions at least one of the following:

(1) whether the site uses any compliance control mechanism or industry self-regulation

program.

(2) whether the site has any privacy seal.

(3) if yes for (2), what kind of seal was used.

j) **Full Enforcement**: The privacy policy mentions all of the following:

(1) whether the site uses any compliance control mechanism or industry self-regulation

program.

(2) whether the site has any privacy seal.

(3) if yes for (2), what kind of seal was used.

k) **Partial compliance with FIP principles**:

The policy addresses at least one principle of notice, choice, access, security or

enforcement.

l) **Full compliance with FIP principles**:

The policy addresses all the principles of notice, choice, access, security or enforcement.

3.7 Evaluating Privacy Policies for Readability

To measure the readability of the policies, the Flesch Reading Ease Score (FRES)

and Flesch-Kincaid Grade Level (FGL) score metrics were used, which were same as

employed by Anton *et.al.* (2004). The metrics provide a standardized and statistical

measure to objectively analyze the text contained in the statements. They provide an

approximate measure of a text's difficulty. The FRES is usually used to examine legal documents. It is based on a scale from 0 to 100, with 0 corresponding to a difficult document to read, and 100 corresponding to an easy document to read. The FGL is a quantity that calculates the number of years of schooling required for a person to be able to read and understand a statement; for example, a score of 8.0 means that an eighth grader would be able to understand a document. The metrics are based on a formula that considers the sentence length and word choice to determine the general readability of a statement. To automate the process, Peter Krantz's readability index calculator was used to compute both the metrics (Krantz, 2011). The values of FRES and FGL were recorded by asking the question: "Is the policy easy to read" in the coding plan. Also to evaluate readability, the study recorded the font size of the policy's content.

3.8 Evaluating Privacy Policies for Accessibility

The accessibility of privacy policies was considered from two perspectives: Firstly, about the ease of finding the policy Secondly, about the completeness in accessing the policy. The first one relates to the existence of the policy link on the homepage, position of the policy link on the page, and its visibility. The second one entails the number of pages the policy is spread across by considering the number of hyperlinks on the policy page.

In the coding plan, the questions that correspond to both the aspects are:

a) Is there a link to the privacy policy statement/notice on the home page?

b) Where on the webpage is the policy link positioned?

c) Is the privacy policy link visible against the site's background color scheme?

d) Is the privacy policy link with other links or by itself?

e) How many clicks is the privacy policy statement/notice from the home page?

f) How many clicks are required to access the whole policy?

g) Does the site provide a link to a privacy policy on all pages collecting personal Identifying Information?

3.9 Summary

In this chapter, the design method for the thesis was described as both qualitative and quantitative research not involving human subjects, employing an experimental design. The quantity that will be measured is the extent of conformance of the policy statements to the FTC's Fair Information Practice principles as well as readability and accessibility. The sampling method chosen is based on rank ordering.

CHAPTER 4. DATA

4.1 Coding Plan

To quantitatively evaluate the research objectives, a coding plan was designed. A set of questions were formulated based on the definition of each Fair Information Practice principle. The representation of each principle of the Fair Information Practice was assessed by comparing the coding plan against each privacy policy. The set of questions for each principle were formulated to be as comprehensive as possible to facilitate addressing the degree of their representation. For every health social network, the table states the questions, the scale used for every question and the answers obtained. The last three health social networks did not post a privacy policy and thus do not have answers for any of the questions in the coding plan.

Table 4.1 WebMD

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	1
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Arial(10)
Is the policy easy to read?	Yes/No	No (FGL: 15, FRES: 25)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies by concept unique identifier
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	retains some information
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	May share without user's consent
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	Yes
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	Yes
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	Yes
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	Yes
Can the user review/change information by regular mail?	Yes/No	Yes
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	SSL and Firewalls
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	Yes
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	Yes
Does the website have a seal?	Yes, No	Yes
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	HON, TRUSTe, URAC

Table 4.2 HealthGrades

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Not clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	1
Is there a privacy policy link on all pages collecting PII?	Yes/No	No
What is the size of the font used in the policy?	9'/10'/11'/12'	Arial(9)
Is the policy easy to read?	Yes/No	No (FGL: 17, FRES: 16)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies using a cookie
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	unclear
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Only under legal obligation
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	Yes
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	No
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	No
Can the user review/change information by e-mail?	Yes/No	Yes
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	Secure server
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	No
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	NA

Table 4.3 MedHelp

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	1
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Arial(10)
Is the policy easy to read?	Yes/No	No (FGL: 16, FRES: 22)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	No policy statement
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	Does not retain any information
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Shares aggregate information
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	Yes
Does the policy state about info. usage to deliver emails?	Yes/No	No
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	Yes
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	SSL and Secure messaging
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	Yes
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	Yes
Does the website have a seal?	Yes, No	Yes
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	HONCode

Table 4.4 CaringBridge

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	1
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Verdana(10)
Is the policy easy to read?	Yes/No	No (FGL: 15, FRES: 23)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies using IP address
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	retains all information
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Shares some of the information
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	Yes it will sell but only in case of Business Transfer
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	Yes
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	No
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	Yes
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	Yes
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	SSL and Secure server
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	Yes
Does the website have a seal?	Yes, No	Yes
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	TRUSTe

Table 4.5 HealthBoards

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	0
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Verdana(10)
Is the policy easy to read?	Yes/No	No (FGL: 13, FRES: 29)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies using IP address
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	unclear
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Shares some of the information
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	No
Does the policy state about info. usage for customization?	Yes/No	No
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	Yes
If yes, can you opt out by e-mail?	Yes/No	No
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	Secure server
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	No
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	NA

Table 4.6 HealthCentral

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	6
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Helvetica(10.5)
Is the policy easy to read?	Yes/No	No (FGL: 14, FRES: 29)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies using IP address
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	unclear
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Shares aggregate information
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	Yes it will sell but only in case of Business Transfer
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	Yes
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	Yes
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	Yes
Can the user review/change information by regular mail?	Yes/No	Yes
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	Secure server
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	Yes
Does the website have a seal?	Yes, No	Yes
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	HON, TRUSTe

Table 4.7 DiabeticConnect

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	2
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Tahoma(9)
Is the policy easy to read?	Yes/No	No (FGL: 16, FRES: 20)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	No
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	No policy statement
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	retains some information
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Shares aggregate information
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	Yes
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	Yes
If yes, can you opt out by e-mail?	Yes/No	No
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	SSL
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	NA
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	Yes
Does the website have a seal?	Yes, No	Yes
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	TRUSTe

Table 4.8 Dlife

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	2
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Helvetica(11)
Is the policy easy to read?	Yes/No	No (FGL: 14, FRES: 36)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies by cookies
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	retains some information
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	No restrictions
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	Yes
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	Yes
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	No
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	No
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	NA
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	NA
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	Yes
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	HON, TRUSTe

Table 4.9 PsychCentral

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	2
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Verdana(10)
Is the policy easy to read?	Yes/No	No (FGL: 17, FRES: 16)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies by cookies
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	does not retain any information
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Only under legal obligation
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No statement
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	Yes
Does the policy state about info. usage to deliver emails?	Yes/No	No
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	No
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	Physical security
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	Yes
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	Noi
Does the website have a seal?	Yes, No	Yes
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	HON

Table 4.10 Wellsphere

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Middle
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	0
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Arial(9)
Is the policy easy to read?	Yes/No	No (FGL: 19, FRES: 9)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies by session ID
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	retains some information
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Never
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	No
Does the policy state about info. usage for customization?	Yes/No	Yes
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	Yes
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	Yes
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	No
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	NA
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	NA
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	No
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	NA

Table 4.11 Carepages

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	1
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Helvetica(10.5)
Is the policy easy to read?	Yes/No	No (FGL: 16, FRES: 23)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies by IP address
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	retains some information
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Shares aggregate information
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	Yes
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	No
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	SSL and Secure server
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	Yes
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	HON

Table 4.12 RevolutionHealth

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	1
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Arial(10.5)
Is the policy easy to read?	Yes/No	No (FGL: 16, FRES: 21)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies by IP address
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	retains some information
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Shares aggregate information
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	Yes
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	Yes
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	SSL and Firewalls
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	Yes
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	HON

Table 4.13 Fatsecret

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	0
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Arial(10)
Is the policy easy to read?	Yes/No	No (FGL: 14, FRES: 23)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies by IP address
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	unclear
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Only under legal obligation
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	Yes it will sell but only in case of Business Transfer
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	Yes
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	Yes
If yes, can you opt out by e-mail?	Yes/No	No
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	Passwords
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	No
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	NA

Table 4.14 MDJunction

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	1
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Times New Roman(12)
Is the policy easy to read?	Yes/No	No (FGL: 13, FRES: 30)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	No
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies by IP address
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	unclear
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Shares aggregate information
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	No
Does the policy state about info. usage for customization?	Yes/No	No
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	Yes
If yes, can you opt out by e-mail?	Yes/No	No
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	No
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	NA
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	Yes
Does the website have a seal?	Yes, No	Yes
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	HON

Table 4.15 Tudiabetes

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	No
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	NA
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	NA
Is the privacy policy link with other links or by itself?	With others, Not with others	NA
How many clicks is the privacy policy from the home page?	Count	2
How many clicks are required to access the whole policy?	Count	3
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Verdana(9)
Is the policy easy to read?	Yes/No	No (FGL: 14, FRES: 29)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies by cookies
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	unclear
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Shares aggregate information
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No statement
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	Yes
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	Yes
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	Yes
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	No
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	NA
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	No
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	NA

Table 4.16 Sermo

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	2
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Helvetica(10.5)
Is the policy easy to read?	Yes/No	No (FGL: 14, FRES: 24)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies by IP address
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	unclear
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Shares aggregate information
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	No
Does the policy state about info. usage for customization?	Yes/No	No
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	Yes
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	SSL
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	No
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	NA

Table 4.17 WEGOHealth

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	0
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Verdana(10.5)
Is the policy easy to read?	Yes/No	No (FGL: 12, FRES: 37)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	No
Does the policy tell users they can turn off cookies?	Yes/No	No
Does the policy tell the users that tracking information is collected?	Yes/No	No
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	No policy statement
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	unclear
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	never
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	No
Does the policy state about info. usage for customization?	Yes/No	No
Does the policy state about info. usage to deliver emails?	Yes/No	No
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	No
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	Yes
Access		
Can the user review/change the information through his/her account?	Yes/No	No
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	SSL
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	No
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	NA

Table 4.18 iMedix

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	0
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Arial(10)
Is the policy easy to read?	Yes/No	No (FGL: 16, FRES: 20)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies by cookies
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	retains all information
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Only under legal obligation
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	No
Does the policy state about info. usage to deliver emails?	Yes/No	No
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	Yes
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	No
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	NA
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	Yes
Does the website have a seal?	Yes, No	Yes
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	TRUSTe

Table 4.19 rVita

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	1
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Arial(10)
Is the policy easy to read?	Yes/No	No (FGL: 14, FRES: 26)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Unclear
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	No policy statement
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	retains all information
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Shares some of the information
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	Yes
Does the policy state about info. usage to deliver emails?	Yes/No	No
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	No
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	No
Can the user review/change information by e-mail?	Yes/No	NA
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	Secure servers
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	Yes
Does the website have a seal?	Yes, No	Yes
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	HON

Table 4.20 healia

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	0
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Helvetica(9)
Is the policy easy to read?	Yes/No	No (FGL: 15, FRES: 23)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies by IP address
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	Does not retain any information
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Only under legal obligation
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	No
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	No
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	Yes
Access		
Can the user review/change the information through his/her account?	Yes/No	No
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	SSL and Firewalls
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	Yes
Does the website have a seal?	Yes, No	Yes
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	HON

Table 4.21 StopaFib

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	0
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Arial(10)
Is the policy easy to read?	Yes/No	No (FGL: 14, FRES: 31)
Does the policy mention about the type of PII collected?	Yes/No	No
Does the policy specify the purpose for collecting the PII?	Yes/No	No
Does the policy mention/describe cookies?	Yes/No	No
Does the policy tell users they can turn off cookies?	Yes/No	NA
Does the policy tell the users that tracking information is collected?	Yes/No	NA
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	No policy statement
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	unclear
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	never
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	No
Does the policy state about info. usage for customization?	Yes/No	No
Does the policy state about info. usage to deliver emails?	Yes/No	No
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	No
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	No
If yes, can you opt out by e-mail?	Yes/No	No
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	No
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	No
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	NA
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	NA
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	Yes
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	HON

Table 4.22 DailyStrength

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	0
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Arial(9)
Is the policy easy to read?	Yes/No	No (FGL: 18, FRES: 16)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies by IP address
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	Does not retain any information
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Only under legal obligation
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	Yes
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	No
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	No
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	No
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	NA
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	Yes
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	HON

Table 4.23 HealingWell

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	3
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Calibri(9)
Is the policy easy to read?	Yes/No	No (FGL: 13, FRES: 22)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies by cookies
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	Does not retain any information
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	No policy statement
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	No
Does the policy state about info. usage for customization?	Yes/No	No
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	Yes
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	No
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	NA
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Cookies
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	No
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	NA

Table 4.24 Inspire

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	0
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Arial(11.5)
Is the policy easy to read?	Yes/No	No (FGL: 17, FRES: 17)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	No
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	No policy statement
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	does not retain any information
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Shares aggregate information
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	Yes
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	Yes
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	No
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	NA
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	No
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	NA

Table 4.25 OrganizedWisdom

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	3
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Arial(11)
Is the policy easy to read?	Yes/No	No (FGL: 16, FRES: 19)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	No
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	No policy statement
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	retains for a certain period
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Shares aggregate information
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	Yes it will sell but only in case of Business Transfer
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	No
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	Yes
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	Yes
Can the user review/change information by regular mail?	Yes/No	Yes
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	Encryption and Firewalls
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	Yes
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	HON

Table 4.26 Nami

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	No
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	NA
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Not clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	NA
How many clicks is the privacy policy from the home page?	Count	2
How many clicks are required to access the whole policy?	Count	3
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Calibri(11)
Is the policy easy to read?	Yes/No	No (FGL: 14, FRES: 25)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies by IP address
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	unclear
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	Shares aggregate information
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No statement
Does the policy state about PII usage to improve the web site?	Yes/No	No
Does the policy state about info. usage for customization?	Yes/No	Yes
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	Yes
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	SSL and Encryption
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	Yes
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	BBBOnline

Table 4.27 FacetoFaceHealth

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	0
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Tahoma(8)
Is the policy easy to read?	Yes/No	No (FGL: 14 FRES: 27)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	No
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies by cookies
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	retains some information
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	May share without user's consent
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	Yes it will sell
Does the policy state about PII usage to improve the web site?	Yes/No	No
Does the policy state about info. usage for customization?	Yes/No	No
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	No
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	Encryption
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	No
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	NA

Table 4.28 Rareshare

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	0
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Calibri(11)
Is the policy easy to read?	Yes/No	No (FGL: 16, FRES: 23)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	No
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies by domain name
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	unclear
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	No policy statement
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No statement
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	Yes
Does the policy state about info. usage to deliver emails?	Yes/No	No
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	No
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	Yes
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	No
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	NA
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	NA
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	No
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	NA

Table 4.29 NewMediaMedicine

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Top
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	0
Is there a privacy policy link on all pages collecting PII?	Yes/No	No
What is the size of the font used in the policy?	9'/10'/11'/12'	Tahoma(10)
Is the policy easy to read?	Yes/No	No (FGL: 19, FRES: 2)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	Does not id customer
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	unclear
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	No policy statement
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	No
Does the policy state about info. usage for customization?	Yes/No	No
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	No
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	No
If yes, can you opt out by e-mail?	Yes/No	No
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	Yes
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	unclear
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	No
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	NA

Table 4.30 PeopleJam

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	0
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Times New Roman(12)
Is the policy easy to read?	Yes/No	No (FGL: 18, FRES: 9)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	No policy statement
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	Does not retain any information
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	No policy statement
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	No
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	Yes
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	Yes
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	Password
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	No
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	NA

Table 4.31 IcYou Health

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Not clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	0
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Trebuchet MS(8.5)
Is the policy easy to read?	Yes/No	No (FGL: 15, FRES: 21)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies using a cookie
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	Unclear
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	No policy statement
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	Yes
Does the policy state about info. usage for customization?	Yes/No	No
Does the policy state about info. usage to deliver emails?	Yes/No	Yes
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	No
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	Yes
Access		
Can the user review/change the information through his/her account?	Yes/No	No
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	Passwords
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	No
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	NA

Table 4.32 Juvenation

Notice		
Does the site have a privacy policy?	Yes/No	Yes
Is there a link to the privacy policy on the home page?	Yes/No	Yes
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	Bottom
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	Not clearly visible
Is the privacy policy link with other links or by itself?	With others, Not with others	With others
How many clicks is the privacy policy from the home page?	Count	1
How many clicks are required to access the whole policy?	Count	0
Is there a privacy policy link on all pages collecting PII?	Yes/No	Yes
What is the size of the font used in the policy?	9'/10'/11'/12'	Times New Roman(12)
Is the policy easy to read?	Yes/No	No (FGL: 18, FRES: 16)
Does the policy mention about the type of PII collected?	Yes/No	Yes
Does the policy specify the purpose for collecting the PII?	Yes/No	Yes
Does the policy mention/describe cookies?	Yes/No	Yes
Does the policy tell users they can turn off cookies?	Yes/No	Yes
Does the policy tell the users that tracking information is collected?	Yes/No	Yes
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	identifies using a cookie
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	unclear
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	May share without user's consent
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	No it will not sell
Does the policy state about PII usage to improve the web site?	Yes/No	No
Does the policy state about info. usage for customization?	Yes/No	No
Does the policy state about info. usage to deliver emails?	Yes/No	No
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	Yes
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	No
If yes, can you opt out by e-mail?	Yes/No	Yes
If yes, can you opt out by regular mail?	Yes/No	Yes
Access		
Can the user review/change the information through his/her account?	Yes/No	Yes
Can the user review/change information by e-mail?	Yes/No	Yes
Can the user review/change information by regular mail?	Yes/No	Yes
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	Yes
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	Passwords
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	Username/password
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	No
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	NA

Table 4.33 ObesityHelp

Notice		
Does the site have a privacy policy?	Yes/No	No
Is there a link to the privacy policy on the home page?	Yes/No	No
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	NA
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	NA
Is the privacy policy link with other links or by itself?	With others, Not with others	NA
How many clicks is the privacy policy from the home page?	Count	NA
How many clicks are required to access the whole policy?	Count	NA
Is there a privacy policy link on all pages collecting PII?	Yes/No	No
What is the size of the font used in the policy?	9'/10'/11'/12'	NA
Is the policy easy to read?	Yes/No	NA
Does the policy mention about the type of PII collected?	Yes/No	No
Does the policy specify the purpose for collecting the PII?	Yes/No	No
Does the policy mention/describe cookies?	Yes/No	No
Does the policy tell users they can turn off cookies?	Yes/No	No
Does the policy tell the users that tracking information is collected?	Yes/No	No
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	NA
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	NA
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	NA
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	NA
Does the policy state about PII usage to improve the web site?	Yes/No	No
Does the policy state about info. usage for customization?	Yes/No	No
Does the policy state about info. usage to deliver emails?	Yes/No	No
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	No
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	No
If yes, can you opt out by e-mail?	Yes/No	No
If yes, can you opt out by regular mail?	Yes/No	No
Access		
Can the user review/change the information through his/her account?	Yes/No	No
Can the user review/change information by e-mail?	Yes/No	No
Can the user review/change information by regular mail?	Yes/No	No
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	No
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	NA
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	NA
Does the policy state about maintaining audit trails?	Yes/No	No
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	No
Does the website have a seal?	Yes, No	No
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	NA

Table 4.34 Medicalmingle

Notice		
Does the site have a privacy policy?	Yes/No	No
Is there a link to the privacy policy on the home page?	Yes/No	No
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	NA
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	NA
Is the privacy policy link with other links or by itself?	With others, Not with others	NA
How many clicks is the privacy policy from the home page?	Count	NA
How many clicks are required to access the whole policy?	Count	NA
Is there a privacy policy link on all pages collecting PII?	Yes/No	NA
What is the size of the font used in the policy?	9'/10'/11'/12'	NA
Is the policy easy to read?	Yes/No	NA
Does the policy mention about the type of PII collected?	Yes/No	NA
Does the policy specify the purpose for collecting the PII?	Yes/No	NA
Does the policy mention/describe cookies?	Yes/No	NA
Does the policy tell users they can turn off cookies?	Yes/No	NA
Does the policy tell the users that tracking information is collected?	Yes/No	NA
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	NA
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	NA
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	NA
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	NA
Does the policy state about PII usage to improve the web site?	Yes/No	NA
Does the policy state about info. usage for customization?	Yes/No	NA
Does the policy state about info. usage to deliver emails?	Yes/No	NA
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	NA
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	NA
If yes, can you opt out by e-mail?	Yes/No	NA
If yes, can you opt out by regular mail?	Yes/No	NA
Access		
Can the user review/change the information through his/her account?	Yes/No	NA
Can the user review/change information by e-mail?	Yes/No	NA
Can the user review/change information by regular mail?	Yes/No	NA
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	NA
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	NA
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	NA
Does the policy state about maintaining audit trails?	Yes/No	NA
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	NA
Does the website have a seal?	Yes, No	NA
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	NA

Table 4.35 Doctorshangout

Notice		
Does the site have a privacy policy?	Yes/No	No
Is there a link to the privacy policy on the home page?	Yes/No	No
Where is the policy link positioned on the webpage?	Top, Middle, Bottom	NA
Is the privacy policy link visible against the site's background color?	Clearly visible, Not clearly visible	NA
Is the privacy policy link with other links or by itself?	With others, Not with others	NA
How many clicks is the privacy policy from the home page?	Count	NA
How many clicks are required to access the whole policy?	Count	NA
Is there a privacy policy link on all pages collecting PII?	Yes/No	NA
What is the size of the font used in the policy?	9'/10'/11'/12'	NA
Is the policy easy to read?	Yes/No	NA
Does the policy mention about the type of PII collected?	Yes/No	NA
Does the policy specify the purpose for collecting the PII?	Yes/No	NA
Does the policy mention/describe cookies?	Yes/No	NA
Does the policy tell users they can turn off cookies?	Yes/No	NA
Does the policy tell the users that tracking information is collected?	Yes/No	NA
How is the user identified by the website?	No policy statement, IDs using a cookie, Does not id customer, Identifies by session Id, Identifies using IP address, identifies by domain name, Other	NA
What is the site's retention policy about user's PII?	retains all the information, retains some information, retains for a certain period, does not retain any information, unclear	NA
What does the policy specifically state about sharing information with its subsidiaries?	May share without user's consent, Shares some of the information, Shares aggregate information, Does not collect any personal info, Only under legal obligation, No policy statement, Never	NA
Does the policy state the company will sell or trade user's personal information?	Yes it will sell, No it will not sell, Yes it will sell but only in case of Business Transfer, NA, No statement	NA
Does the policy state about PII usage to improve the web site?	Yes/No	NA
Does the policy state about info. usage for customization?	Yes/No	NA
Does the policy state about info. usage to deliver emails?	Yes/No	NA
Choice		
Does the policy discuss options for the user to opt in or opt out of receiving any email based newsletters or product offerings?	Yes/No	NA
If yes, can the user opt out by changing the settings within his/her profile?	Yes/No	NA
If yes, can you opt out by e-mail?	Yes/No	NA
If yes, can you opt out by regular mail?	Yes/No	NA
Access		
Can the user review/change the information through his/her account?	Yes/No	NA
Can the user review/change information by e-mail?	Yes/No	NA
Can the user review/change information by regular mail?	Yes/No	NA
Integrity		
Does the policy provide cues or discuss controls for security?	Yes/No	NA
What types of controls are used?	Passwords, VeriSign, Secure Sockets Layer (SSL), Firewalls, Secure messaging, Secure Server, Physical security, Unclear	NA
What are the means for user authentication?	Username/Passwords, Certificates, Cookies etc.	NA
Does the policy state about maintaining audit trails?	Yes/No	NA
Enforcement		
Does the policy state about self-regulation programs?	Yes, No	NA
Does the website have a seal?	Yes, No	NA
If yes, what kind of seal does it have?	HONcode, TRUSTe, BBBOnline, WebTrust, URAC	NA

4.2 Summary

In this chapter, the important data that were collected using the coding plan for hypothesis testing were stated. The coding plan facilitated crucial data to be collected for measuring compliance, readability and accessibility of the policies. Results from analysis and related discussions will be dealt with in the next chapter.

CHAPTER 5. DISCUSSION AND CONCLUSION

5.1 FIP Compliance

Table 5.1 lists results of the level of compliance with the FIPs of the policies.

The majority of the Web sites had the extension .com (27 Web sites, 77.1%),

followed by .org (8, 22.9%). Seventeen Web sites (48.6%) had at least one quality

certificate, the most frequent being the HON Code on 13 Web sites, followed by

TRUSTe on 6 websites and finally BBBOnline and URAC on 1 website each. Out of 35,

32 (91%) sites had a privacy policy posted and only 9 out of 35 (26%) fully complied

with FIP principles. 49% of the sites have a privacy seal.

5.2 Accessibility

The sample of websites was examined to determine how easy it was to find the

policies. Out of the 32 sites posting a privacy policy, we found that 28 sites (87.5%)

offered a link to it from the bottom of their homepage. One site (3.1%) offered it as a link

in the middle of the page, while another site (3.1%) offered it as a link at the top of the

page. 30 sites (94%), including all the physician social networks (Sermo), offered a direct

link to their privacy policy using such mechanisms; the remaining two sites (6%)

required users to go through an intermediate page to get to the privacy policy, typically

Table 5.1 Levels of compliance

Content	Count	Percent
Sites with privacy policy	32/35	91%
Policy link's visibility against background	27/31	87%
Policy link with other links	30/30	100%
Privacy policy links accessed by a single click from the homepage	30/32	94%
Privacy policies greater than single page	17/32	53%
Policies with font size smaller than 10'	9/32	28%
Policies with Flesch-Kincaid Grade level > 12	31/32	97%
Policies with Flesch-Kincaid Reading Ease score > 30	3/32	9%
Policies stating about cookies	30/32	94%
Policies not stating about how the sites identify users	8/32	25%
Policies stating about Information usage towards site improvement	21/32	66%
Policies stating about Information usage towards user profile customization	18/32	56%
Policies stating about Information usage towards sending marketing information to the users	24/32	75%
Sites having seals	17/35	49%
Partial Notice	32/35	91%
Full Notice	9/35	26%
Partial Choice	30/35	86%
Full Choice	2/35	6%
Partial Access	25/35	71%
Full Access	4/35	11%
Partial Security	27/35	77%
Full Security	3/35	9%
Partial Enforcement	17/35	49%
Full Enforcement	9/35	26%
Partial compliance with FIPs	32/35	91%
Full compliance with FIPs	9/35	26%

"terms of use" page. 3 out of the 30 sites (10%) with a direct link to the policy clouded the link through formatting. This was generally caused by changing the font color so it would more easily blend in with the background. For all the sites offering a direct link to the policy, the link was always placed with other links and never by itself. Except for 2 sites, all other sites provided a link to the policy on all the pages collecting PII. With respect to organization of policies and their spread across a number of pages, we found that 17 sites (53.1%) split their privacy policies over more than one page. Out of 17 sites, all except one site split the policies into either two (25%) or three (12.5%) or four (12.5%) pages. Only one site (3%) split its policy into six pages. Multi-page policies always had a uniform structure: one main policy page, with links to pages containing additional details or definitions.

5.3 Readability

The study found the average FGL of 14.0571 and average FRES of 20.2571. This average is lower than the average education level of Internet users (14.4), but higher than that of the general population because Internet users have an education level higher than the general population (Reay *et. al.*, 2009). The most difficult policy across the sample had a FGL of 19, the equivalent of a postgraduate education. The most readable policy required a high school education (12). The average FRES score also falls under the most difficult category of comprehension (0-29) [11]. Out of 32 policies, only 4 (12.5%) had an FRES score greater than 29. The smallest FRES score was 2 and highest FRES score was 37. Of the 32 policies, only one (3%) was found to be accessible to the 36.2% of the Internet population with less than or equal to a high school education. Nineteen policies

(59%) were beyond the grasp of 20.4% of the Internet population, requiring the equivalent of more than fourteen years of education. Eight policies (25%) were beyond the grasp of the majority of the Internet population, requiring the equivalent of a postgraduate education. Overall, a large segment of the population can only reasonably be expected to understand a small fragment of the policies posted. Also, considering larger font size increases readability, the largest font size for a policy was 12' and the smallest was 8'. A majority of the policies had a font size in between the two extremes.

5.4 Discussion

5.4.1 FIP Compliance

Considering the significance of the Notice and Enforcement principle, privacy policies of health social networks have been found to have done poorly as only 26% of the sites fully complied with the Notice and the Enforcement principle. This is also due to the general observation that Notice principle is the most addressed or complied with compared to others. However, 49% of the sites have a privacy seal which is a relatively positive sign. Websites post a "privacy seal"- a certification from an external certifying body, affirming that the website is indeed collecting and using personal information in a manner that is compliant with certain standard guidelines - to assure users of their commitment to protecting their privacy. Some of the important reasons for websites to bear privacy seals are as follows (Penn, 2006): Smaller networks need privacy seals since customers do not necessarily trust them implicitly to protect their data. The presence of a privacy seal serves to build trust in users as well as in establishing a reputation. Larger networks do not need it as much for the purposes of establishing trust or gaining a

reputation as for internal purposes such as ensuring uniformity in the implementation of the policy across various departments and in ensuring compliance with the stated policy, which is easier to do with the help of an external agency. The certifying authorities can play this role. Certification by external agencies lends credence and is slowly becoming an industry norm. Also, privacy seals attempt to embody fair information practices similar to those supported by the U.S. Federal Trade Commission, U.S. Department of Commerce, and other industry associations such as the Online Privacy Alliance (www.privacyalliance.org) (Moores, 2005).

5.4.2 Accessibility

The sites in the sample had privacy policies that were mostly accessible. Most of them had the links at the bottom of the homepage, along with other links. This has been a location mark as links at the bottom of the page are found consistently across different websites. Even though there were policies spread across multiple pages, they were only one site which had a policy spread across 6 pages. Hence, getting an overall picture of the policies of health social networks is generally not obscured by the many pages of policy content.

5.4.3 Readability

Most of the policies required readability levels that correspond to college level education and were generally difficult to comprehend for any average user.
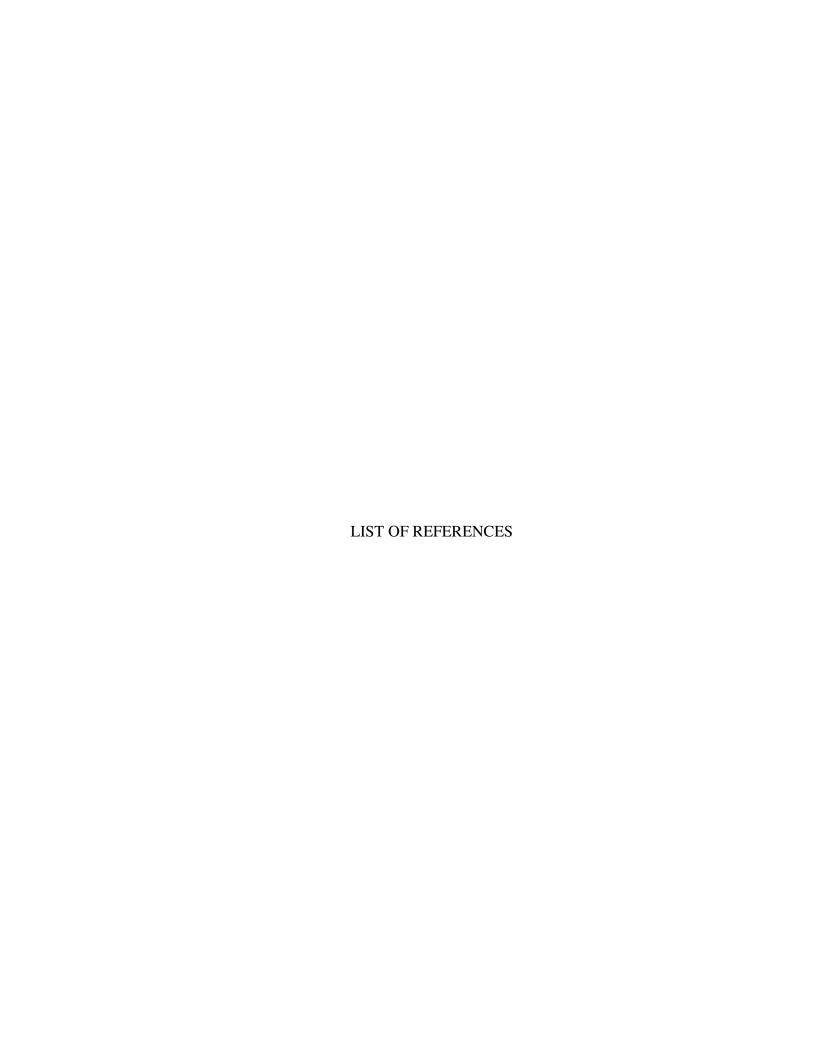
5.5 Future Work and Recommendations

This research can be extended further. One direction for future work can be to include a wider range of physician health social networks. Examining health social networks that are designed to cater not only to patients but also to physicians will cover a wider range of websites. Also, it would be worthwhile to examine health social networks with other kinds of healthcare-related websites in a hybrid study. In this study, the indicator utilized to measure readability was Flesch Kincaid. However, other indicators such as Gunning Fog, SMOG and Fry can be applied to measure readability of privacy policies. This research involved the use of FTC's five principles of fair information practice as a benchmark against privacy policy contents. The five principles are by no means exhaustive but cover the core areas of fair information practice. However, for a more comprehensive examination, the Organization for Economic Cooperation and Development's (OECD) seven principles governing recommendations for protection of personal data can also be applied when dealing with the issue of fair information practice.

5.6 Conclusion

This paper makes a distinct contribution to the area of Health Social Networks by assessing the extent of compliance of its privacy policies to the FIP principles as well as by evaluating the issues of readability and accessibility. Even though the emergence of social networks has created new levels of patient participation, it has been found that health social networks are involved in practices such as selling user data, allowing external third parties to collect data, sending unsolicited emails to registered users, or sharing email addresses with their subsidiaries. This makes it all the more important that

users read privacy policies to become aware of what can happen to their information and to be able to make an informed decision as to whether or not they want to disclose any PII on the social network. As regards to privacy seals, while their presence is assuring to users, there have been instances where multiple seals have been granted to sites that have been in violation of the certifying authorities stated policies, violation of the sites own privacy policies as well as other cases of deviation from stated practice (Edelman, 2006). In the light of these findings, it is necessary to bear in mind that while privacy seals do assist in building user trust in websites, they are by no means perfect. Considering our findings in the area of FIP compliance and readability, we can state that current privacy policy statements of health social networks do not function to adequately inform users of the site's privacy policy and thus do not protect users' privacy rights.

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