**Global results from the first GPEN Internet Privacy Sweep**

**Explaining the GPEN privacy sweep**

The first Global Privacy Enforcement Network (GPEN) Internet Privacy Sweep took place from May 6-12, 2013 as an exercise in privacy enforcement authorities working together to protect the privacy rights of individuals around the world.

Nineteen privacy enforcement authorities participated. The purpose of the sweep was not to conduct an in-depth analysis of each website, but to replicate the consumer experience by spending a few minutes per site checking for performance against a set of common indicators. Over the week, participating authorities searched the Internet in a coordinated effort to assess privacy policies and their transparency.

The goals of the initiative included: increasing public and business awareness of privacy rights and responsibilities; encouraging compliance with privacy legislation; identifying concerns which may be addressed with targeted education and/or enforcement; and enhancing cooperation amongst privacy enforcement authorities.

The sweep was not an investigation, nor was it intended to conclusively identify compliance issues or legislative breaches. Rather, the initiative was meant as a ‘temperature gauge’ to give a broad indication of websites that display privacy information well and those that don’t.

**Major trends observed around the world**

While GPEN members did see some good examples of privacy policies, unfortunately, the sweeps also found significant shortcomings:

* In the sweep of 2186 websites and mobile apps, 23% were found to have no privacy policy available.
* In some cases, sites would make brief over-generalised statements about privacy while offering no details on how organisations were collecting and using customer information.
* A greater proportion of large organisations typically had privacy policies on their websites, in comparison to small and medium-sized organisations.
* One-third of the policies examined raised concerns with respect to the relevance of the information provided in them. In many policies, we saw the use of standard boilerplate language which did not take into account the relevant privacy jurisdiction.
* Too often, the policies focused disproportionately on the use of cookies while providing limited information on how organisations were collecting, using and disclosing personal information.
* Approximately 33% of the privacy policies raised concerns with respect to readability, with many of these policies quoting directly from applicable legislation. In doing so, these policies proved of limited benefit to the average consumer seeking a clear and concise explanation of how their information is being collected and used.

The privacy policies of mobile apps lag behind traditional websites.

* 92% of mobile app privacy policies reviewed in the sweep raised one or more concerns with respect to how they present information about their privacy practices.
* 54% had no privacy policy at all.
* In some cases, organisations simply provided links to privacy policies for their websites which did not specifically address the collection and use of information within apps.

**Best practices observed**

* Many organisations had privacy policies that were easy to find, simple to read and contained privacy-related information that consumers would be interested to know, which demonstrates that it is possible to create transparent privacy policies.
* Many policies addressed consumers’ rights and obligations within that jurisdiction, describing what information is collected, for what purposes it is used, and with whom it is shared.
* Some of the best examples observed during the sweep were policies that made efforts to present the information in a way that was easily understandable and readable to the average person. This was accomplished through the use of plain language; clear and concise explanations; and the use of headers, short paragraphs, FAQs, and tables, among other methods.
* 80% of organisations ensured that their privacy policy included contact information for the person responsible for privacy practices within that organisation. Providing more than one option for contacting that individual (e.g. mail, toll-free number and/or e-mail) is a thoughtful way of ensuring there are no barriers to contacting an organisation about its privacy practices.
* Some policies we observed had been tailored for mobile apps and sites, going beyond simply providing a hyperlink to an organisation’s existing website privacy policy. Explaining privacy practices can be difficult on a mobile platform with a small screen, and so we encourage organisations to find innovative ways of conveying their privacy policies on mobile devices.

**Follow-up**

GPEN privacy sweep efforts are ongoing.

Several enforcement authorities have already taken follow-up action and several more are in the process of following up directly with organisations whose website privacy policies (or lack thereof) were of concern.

Follow-up actions could include outreach to organisations and enforcement actions.