FTC PrivacyCon January 14, 2016 Segment 2 Transcript

>> PLEASE STAND BY.

>> OK.

EVERYONE, PLEASE TAKE YOUR

SEATS.

WE'RE ABOUT TO GET STARTED WITH

THE NEXT SESSION.

>> GOOD MORNING.

I'M CHRIS, AN ATTORNEY NOTICE

PRIVACY AND IDENTITY WITHIN THE

FTC BUREAU OF PROTECTION.

I'M HERE TO INTRODUCE THE SECOND

SESSION, ON CONSUMERS' PRIVACY

EXPECTATIONS.

WE WILL HEAR FROM SIX

**RESEARCHERS AND FOUR 15-MINUTE** 

PRESENTATIONS AND THEN WE WILL

CONCLUDE WITH ABOUT 20 MINUTES

OF DISCUSSION, WHERE WE WILL

IDENTIFY COMMON THEMES AND ASK

THE PRESENTERS ABOUT THEIR WORK

AND IMPLICATIONS.

SO WHENEVER AN APPLICATION **REQUESTS ACCESS TO CERTAIN** SENSITIVE DATA, IT'S REGULATED BY THIS PERMISSION SYSTEM, SO WHEN USERS INSTALL AN APPLICATION THEY SEE A SCREEN THAT INFORMS THEM OF ALL OF THE POSSIBLE TYPES OF SENSITIVE DATA THAT THAT APPLICATION MIGHT BE **REQUESTING IN THE FUTURE.** SO THE QUESTION WAS, DOES THIS ACTUALLY IMPLEMENT EFFECTIVE NOTICE AND CHOICE? SO DO USERS UNDERSTAND THESE MESSAGES ABOUT HOW APPLICATIONS COULD BE USING THEIR DATA IN THE FUTURE? SO WE STARTED THIS PROJECT A COUPLE OF YEARS AGO BY DOING AN **ONLINE SURVEY.** WE HAD OVER 300 ANDROID USERS, AND WE JUST SHOWED THEM SCREENSHOTS OF THESE PERMISSION

SCREENS AND SIMPLY ASKED THEM IF AN APPLICATION, YOU KNOW, WERE GRANTED, WAS GRANTED THESE ABILITIES WHAT MIGHT THAT ALLOW THE APPLICATION TO DO? WE THEN FOLLOWED THAT UP WITH A QUALITATIVE STUDY WHERE WE HAD 24 PEOPLE COME TO OUR LABORATORY AND WE INTERVIEWED THEM ABOUT SIMILAR CONCEPTS. AND WHAT WE CONCLUDED FROM THIS WAS THAT MANY PEOPLE WERE SIMPLY HABITUATED SINCE THESE APPEAR AFTER TIME PEOPLE INSTALL APPLICATIONS NOT ONLY DOES IT

LIST WHAT ABILITIE â ÞÀ Í IEB-5(E)-1(E)-1(S)-1(C)-5(AT)-11(R)-51(S)-6D WAIONH(TH)1(TT)-1(H

THEY SEE LOTS OF THESE REQUESTS THAT HAVE LOTS OF DIFFERENT DATA TYPES, SOME OF WHICH THEY DON'T UNDERSTAND, AND THEREFORE, THEY LEARN TO IGNORE THESE BECAUSE THERE'S JAUSE APPLICATION, THERE ARE VARIOUS COGNITIVE BIASES RELATED TO THIS, AND SO THEREFORE IT'S UNLIKELY THEY'RE ACTUALLY COMPARISON SHOPPING BASED ON PRIVACY EVEN IF THEY WANTED TO. AND ANOTHER ISSUE IS THAT UNDERSTANDING WHETHER A PARTICULAR APPLICATION IS GOING TO ACCESS A PARTICULAR TYPE OF DATA REALLY REQUIRES A GOOD UNDERSTANDING OF THIS WHOLE PERMISSION SYSTEM AND WHAT ARE THE DIFFERENT TYPES OF DEAFT THAT ARE REGULATED BY THE PERMISSION SYSTEMS. SO YOU KNOW, UNDERSTANDING WHETHER AN APPLICATION IS **REQUESTING A DATA TYPE REQUIRES** UNDERSTANDING THE WHOLE UNIVERSE OF DATA TYPES THAT ARE GOVERNED HERE.

AND SO WE MADE THESE

**RECOMMENDATIONS AND, YOU KNOW,** WHAT WE CONCLUDED WAS A LOT OF THIS COULD BE TAKEN AWAY. SO TRANSPARENCY IS GREAT AND NOTICE AND CHOICE IS GOOD BUT THE PROBLEM IS THAT WHEN PEOPLE WILL OVERWHELMED BY THE NOTICE WHICH IS WHAT WE SEE WITH PRIVACY POLICIES ON WEB SITES, THEY EVENTUALLY JUST IGNORE IT ALL BECAUSE THERE'S SO MUCH INFORMATION. SO YOU KNOW, WHAT WE FOUND WAS THAT A MAJORITY OF THESE PERMISSIONS COULD PROBABLY JUST BE GRANTED AUTOMATICALLY WITHOUT SHOWING THE USER LOTS OF INFORMATION BECAUSE EITHER THE DANGERS ARE VERY LOW RISK, FOR INSTANCE, YOU KNOW, CHANGING THE TIME FOR INSTANCE OR, YOU KNOW, CAUSING THE DEVICE TO CAUSING THE DEVICE TO VIBRATE

ARE IRREVERSIBLE.

CHANCES ARE, THE USER CAN FIND OUT ABOUT IT AND UNDO IT. YOU KNOW, THERE'S NO LASTING HARM THEN. AT THE SAME TIME, THERE'S A FEW VERY SENSITIVE THINGS, WHICH BECAUSE OF DOING THIS INSTALL TIME, THAT'S PROBABLY THE WRONG TIME DURING THE PROCESS. THE USER HAS NO CONTEXT ABOUT HOW THE DATA MIGHT BE USED IN THE FUTURE, THESE COULD PROBABLY **BE PLACED WITH RUN-TIME** DIALOGUES. ANOTHER OPEN QUESTION IS, THIS IS JUST LOOKING AT THE DIFFERENT ABILITIES AND DATA TYPES THAT COULD BE REQUESTED BY AN APPLICATION, WE DIDN'T LOOK AT HOW FREQUENTLY THESE DATA TYPES AND ABILITIES ARE USED IN REALITY.

SO THINGS IMPROVED.

WE DID THIS STUDY TWO, THREE YEARS AGO IN THE MOST RECENT VERSIONS OF ANDROID AND IOS. THEY NOW HAVE A FEW RUN-TIME

DIALOGUES THAT PROMPT THE USER

AT THE TIME THAT AN APPLICATION

WILL FIRST REQUEST ACCESS TO

CERTAIN DATA TYPES.

THE PROBLEM WITH THIS IS -- SO

IT ADDS SOME CONTEXTUAL

INFORMATION.

THE USER IS DOING SOMETHING.

THIS DIALOGUE APPEARS.

YOU KNOW, THEY COULD PROBABLY

USE INFORMATION ABOUT WHAT THEY

DATA.

THE PROBLEM WITH THIS IS, IT ONLY APPEARS THE FIRST TIME THAT DATA TYPE IS REQUESTED. ONCE THIS IS GRANTED, THE USER NEVER SEES THE DIALOGUES AGAIN. THEN WE GAVE THESE INSTRUMENTED PHONES TO 40 PEOPLE, 36 OF THEM RETURNED SAID PHONES, AND WE ENDED UP WITH A PRETTY ROBUST DATA SET.

IT.

ACCESSING DATA ON THE PHONE.

YOU KNOW, CONNECTIVITY,

LOCATION.

WHAT PART OF THE APPLICATION

THEY'RE CURRENTLY VIEWING, SO

WHAT EYE ELEMENTS WERE EXPOSED

MIGHT YIELD INFORMATION WHETHER

THIS ACCESS TO DATA WAS EXPECTED

OR NOT AND HISTORY TO OTHER

APPLICATIONS.

WE LET PEOPLE USE THE PHONES

ABOUT A WEEK.

WE TRANSFERRED ACTUAL REAL DATA

ON THEM.

THEY'RE USING THEM AS THEY WOULD

THEIR NORMAL PHONES.

THEY POPPED THEIR SIM CARDS INTO

THEM.

AT THE END OF THE WEEK, THEY

CAME BACK TO OUR LAB AND WE GAVE

THEM QUESTIONNAIRES.

WE SHOWED THEM SCREEN SHOTS THAT

OCCURRED DURING THE COURSE OF

THE WEEK AND THEN ASKED THEM QUESTIONS. SO THE SCREEN SHOTS WERE TAKEN RANDOMLY WHENEVER ONE OF THESE SENSITIVE DATA TYPES WAS ACCESSED SO WE CAN ASK THEM, YOU KNOW, AS A PROMPT, YOU WERE DOING SOMETHING, THIS IS WHAT YOU WERE DOING ON THE SCREEN OF YOUR PHONE. IT WAS REQUESTING THIS PARTICULAR TYPE OF DATA. IS THAT -- WAS THAT EXPECTED? DID YOU EXPECT THAT APPLICATION TO BE REQUESTING THAT PARTICULAR DATA TYPE AT THIS MOMENT IN TIME, AND ALSO IF YOU WERE GIVEN THE ABLE TIP TO, WOULD YOU HAVE PRESENTED THAT FROM HAPPENING. SO THEN WE USE THAT AS GROUND TRUTH TO SEE WHETHER WE COULD PREDICT WHETHER A USER WOULD HAVE WANTED THAT DATA TO BE

ACCESSED BY THE APPLICATION OR

NOT.

SO THIS RESULTED IN -- WE HAD 36

PEOPLE PARTICIPATE.

WE HAD OVER 6,000 HOURS OF

REAL-TIME USAGE.

DURING THAT ONE WEEK PERIOD WITH

36 PEOPLE, WE FOUND 27 MILLION

REQUESTS FOR SENSITIVE DATA THAT

WAS PROTECTED BY THIS PERMISSION

SYSTEM.

SO SOME OF THE PROBLEMS THAT WE

FOUND WERE DUE TO INCORRECT

MENTAL MODELS.

SO AGAIN, THE GOAL OF THIS IS

TRANSPARENCY.

SHOW THE USER, YOU KNOW, ALL THE

POSSIBLE WAYS THAT AN

APPLICATION MIGHT BE ACCESSING

SENITIVE DATA.

IS IT WORKING.

IN 75% OF THE CASES, ONE OF THE

APPLICATIONS REQUESTING THE DATA

ALL.

THE ICON APPEARS IN .04% OF THE

CASES WHERE LOCATION DATA WAS

ACCESSED.

THAT'S BECAUSE EVERY TIME AN

THE BEGINNING WHEN USERS INSTALL

THE APPLICATION OBVIOUSLY

DOESN'T WORK.

WE'VE TESTED THAT.

THE ASK ON FIRST USE THAT IS

CURRENTLY HAPPENING ISN'T REALLY

WORKING BECAUSE OF THE DIFFERENT

CONTEXTS IN WHICH USERS MIGHT BE

SO HAVING LOTS OF POP-UPS APPEAR ON THE PHONE IS NOT REALLY A GOOD WAY OF GOING FORWARD EITHER THAT WILL LEAD TO HABITUATION. THE VAST MAJORITY OF PARTICIPANTS SAID THEY WOULD DENY AT LEAST ONE OF THESE

**REQUESTS.** 

ON AVERAGE, THEY WOULD DENY A THIRD OF THE REQUESTS. HOW DO WE GIVE USERS CONTROL OVER THE THINGS THEY CARE ABOUT WITHOUT OVERWHELMING THEM? WE'RE DOING WORK TO TRY TO PREDICT THE CASES WHERE APPLICATIONS ACCESS DATA WHERE PEOPLE WOULD WANT TO KNOW THIS IS OCCURRING WHEREAS THE OTHER ONES WHERE APPLICATIONS ACCESS DATA THAT MIGHT BE EXPECTED, WELL, WE SHOULDN'T PROMPT THE USER IN THOSE CASES. SO WHAT WE FOUND IS THAT

EXPECTATIONS REALLY DID PREDICT

BEHAVIOR IN THIS CASE.

WE ASKED PEOPLE IF THIS ACCESS

TO PERSONAL DATA WAS EXPECTED OR

NOT.

AND THEN WHETHER THEY WOULD HAVE

BLOCKED IT.

THERE WAS A STRONG CORRELATION

THERE.

VISIBILITY OF THE APPLICATION WAS A STRONG PREDICTOR OF USER EXPECTATIONS. SO APPLICATIONS RUNNING IN THE BACKGROUND ASKING DATA WERE --OFTEN THOSE WERE UNEXPECTED. IF WE ADD THAT TO THE EQUATION, WE CAN GET THIS RIGHT ABOUT 80% OF THE TIME. SO INSTEAD OF ASKING ON THE FIRST USE, WE COULD ASK THE FIRST TIME THAT THE APPLICATION **REQUESTS THE DATA IN THE** FOREGROUND AND ASK THE FIRST TIME ASKS THE APPLICATION **REQUESTS THE INFORMATION IN THE** BACKGROUND AND THEN WE GET IT **RIGHT 80% OF THE TIME.** THE DATA WAS NUANCED. LOOKING AT ONE USER'S PREFERENCES COMPARED TO ANOTHER **DIDN'T WORK AMONG OUR 36** PARTICIPANTS.

THERE'S SO MUCH DATA WITH REGARD TO WHAT PEOPLE WANTED AND WHAT THEIR EXPECTATIONS WERE, WHICH SUGGESTED THAT HAVING A ONE SIZE FITS ALL SOLUTION ABOUT WHAT PEOPLE CARE ABOUT AND WHAT SHOULD THEY BE SHOWN IS UNLIKELY TO WORK EITHER. SO MAYBE WE NEED MORE INTELLIGENCE SYSTEMS THAT CAN PREDICT USER PREFERENCES ON A PER-USER BASIS. SO GOING FORWARD WE'RE TRYING TO IMPLEMENT THE SYSTEMS RIGHT NOW THAT CAN PREDICT A GIVEN USER'S PREFERENCES BASED ON THEIR PREVIOUS BEHAVIORS. AND YOU KNOW, THIS IS PART OF A PRETTY COMPLEX ECOSYSTEM. WE HAVE WHAT WE CALL HARD POLICY, WHICH IS PREFERENCES THAT PEOPLE HAVE EXPLICITLY STATED.

I DON'T WANT APPLICATIONS TO BE USING DATA FOR X REASON AND TRYING TO AUGMENT THAT WITH SOFT POLICIES. SO INFERRED PREFERENCES THAT SYSTEMS CAN MAKE UP ABOUT USERS LIKE LOOKING AT, YOU KNOW, HUNDREDS OF THOUSANDS OR MILLIONS OF USERS, WE CAN INFER ONE USER'S PREFERENCES BASED ON OTHER USERS LIKE THEM, LIKE **RECOMMENDED SYSTEMS.** BASED ON THE FEEDBACK FROM PROMPTS. SO IF WE CAN DESIGN MORE EFFICIENT PROMPTS THAT, YOU KNOW, CATER TO INDIVIDUAL USER EXPECTATIONS, WE CAN USE THE OUTPUT OF THOSE. WHAT DID THE USER DECIDE TO

I'LL LEAVE IT AT THAT.

SO -- WELL, THE CONCLUSION IS,

YOU KNOW, NOTICE IN CHOICE IS

GREAT.

THE PROBLEM IS FIGURING OUT WHAT

NOTICE TO GIVE PEOPLE SINCE

ATTENTION IS A PLANET RESOURCE.

SO I'LL LEAVE IT AT THAT.

[APPLAUSE]

>> THANK YOU, SERGE.

NOW WE'LL HEAR FROM ASHWINI RAO

ABOUT PRIVY EXPECTATIONS ONLINE.

>> THANK YOU.

SO YEAH, MY TALK IS ABOUT

EXPECTING THE UNEXPECTED,

UNDERSTANDING THE MISMATCHED

PRIVACY EXPECTATIONS ONLINE.

START WITH MOTIVATION.

SO MANY OFFICES ON A DAILY BASIS

INTERACT WITH ONLINE WEBSITES.

AS WE INTERACT WITH ONLINE

WEBSITES, WE MAY HAVE QUESTIONS

LIKE WHAT TYPE OF DATA DOES THIS

FINANCIAL INFORMATION.

AND HEALTH WEBSITES TO COLLECT

HEALTH INFORMATION.

THESE EXPECTATIONS MAY BASED ON

CONTEXT, LIKE THE TYPE OF

WEBSITE, OUR USER

CHARACTERISTICS.

AGE, PRIVACY KNOWLEDGE, PRIVACY

CONCERN.

HOWEVER, USER EXPECTATIONS MAY

NOT MATCH WHAT WEBSITES TO.

EXAMPLES, USERS MAY NOT EXPECT

BANKING WEBSITES TO COLLECT

HEALTH INFORMATION.

NOW, THE QUESTION HERE IS COULD

WE GENERATE EFFECTIVE PRIVACY

NOTICES BY EXTRACTING AND

HIGHLIGHTING THESE DATA

PRACTICES THAT DO NOT MATCH USER

EXPECTATIONS?

YOU ALREADY EXPECT OR KNOW. A PRIVACY NOTICE HAS TO INFORM YOU ABOUT THING THAT YOU DO NOT EXPECT OR YOU DO NOT KNOW. SO I WANT TO MAKE A DISTINCTION BETWEEN POLICY AND NOTICE. A POLICY IS USUALLY A TEXT YOU'LL DOCUMENT. A NOTICE, WHICH IS BASED ON THE POLICY IS USUALLY SHORTER AND MORE USABLE. SO HERE I'M SHOWING YOU THE PRIVACY NUTRITION LABEL WHICH FOCUSED ON VISUAL FORMATS. SO FAR NOTICES THAT MAKE -- THAT ARE MORE EFFECTIVE, OUR RESEARCH HAS FOCUSED ON VISUAL FORMATS. IN OUR APPROACH OF EXTRACTING AND HIGHLIGHTS MISMATCHED EXPECTATIONS IS COMPLEMENTARY TO THIS APPROACH. ONCE WE IDENTIFY AND EXTRACT THESE MISMATCHED EXPECTATIONS,

WE COULD PRESENT THEM TO THE

USER IN ANY VISUAL FORMAT THAT

IS EFFECTIVE.

I ALSO WANT TO SAY HERE THAT

THIS PRIVACY NOTICES DO NOT HAVE

TO BE GENERATED, PROVIDED BY THE

WEBSITE OPERATORS THEMSELVES.

THESE COULD BE OPERATED BY A

THIRD PARTY.

FOR EXAMPLE, THROUGH A BROWSER

PLUG-IN.

THIS IS IMPORTANT TO NOTE.

SO THE MAIN QUESTIONS ARE HOW DO

WE DEFINE EXPECTATION AND HOW DO

WE MEASURE EXPECTATIONS AND

MEASURE MISMATCHES IN THESE

EXPECTATIONS.

SO RESEARCH AND NONPRIVACY

DOMAINS SHOW THAT USERS CAN HAVE

MULTIPLE TYPES OF EXPECTATIONS.

PRIVACY RESEARCH HAS

PREDOMINANTLY NOT FOCUSED ON

MULTIPLE TYPES OF EXPECTATIONS.

SO WE HAVE THE EXPECTATION IN

THE LIKELIHOOD SENSE.

WHAT DOES THE USER EXPECT THAT

THIS WEBSITE WILL DO?

VERSUS WHAT DOES THE USER EXPECT

THE WEBSITE SHOULD DO.

THIS IS IN THE THE DESIRED

SENSE.

WE COMPARE THAT WITH PRACTICES,

DATA PRACTICES OF WEBSITES.

TO MEASURE EXPECTATIONS, WE CAN

CONDUCT USER STUDIES.

SO ONE OF THE USER STUDIES THAT

WE CONDUCTED FOCUSED ON THE

EXPECTATION IN THE LIKELIHOOD

SENSE.

IN FUTURE WE ALSO PLAN TO

MEASURE EXPECTATION IN THE

DESIRED SENSE.

SO WE PRESENT USERS WITH

DIFFERENT TYPES OF WEBSITES

AFTER THE USER HAS INTERACTED

WITH THE WEBSITE, WE ASK WHAT DO

YOU ASSUME THE WEBSITE WILL DO? ONCE WE ELICITED USER EXPECTATIONS, WE NEXT EXTRACTED THE DATA PRACTICES FROM PRIVACY POLICIES. THEN WE COMPARE THESE TWO TO **IDENTIFY MISMATCHES.** SO IN A STUDY, WE USED -- WE VARIED THE WEBSITE CATEGORY STAKES AND USER CHARACTERISTICS. AS I MENTIONED EARLIER, USER EXPECTATIONS CAN VARY BASED ON THESE WEBSITE AND USER CHARACTERISTICS. WE LOOKED AT 17 DIFFERENT DATA PRACTICES, WHICH WAS SPLIT AMONG COLLECTION, SHARING AND DELETION. FOR COLLECTION SHARING, WE LOOKED AT FOUR DIFFERENT TYPES OF DATA.

CONTACT INFORMATION, FINANCIAL,

HEALTH AND CURRENT FINANCIAL

INFORMATION. SO HERE'S AN EXAMPLE SCENARIO. SO HERE THE SCENARIO IS DESCRIBING THE COLLECTION OF DIFFERENT TYPES OF DATA WHEN THE USER DOES NOT HAVE AN ACCOUNT ON THE WEBSITE. SO YOU CAN SEE WE'RE ASKING THE USER, WHAT IS THE LIKELIHOOD THAT THIS WEBSITE WILL COLLECT YOUR CONTACT INFORMATION. SO IN FUTURE, IF WE WANTED TO MEASURE DESIRED EXPECTATIONS, WE COULD ASK THEM, DO YOU THINK THE WEBSITE SHOULD BE OR SHOULD NOT ALLOWED TO COLLECT THIS INFORMATION IN ADDITION TO DO YOU THINK IT'S LIKELY THAT THE WEBSITE WOULD COLLECT YOUR INFORMATION. SO WE DEPLOYED THIS STUDY AS AN **ONLINE SURVEY.** WE STUDIED TOTAL 16 WEBSITES,

HAD 240 PARTICIPANTS.

SO THIS WAS THE ELICIT USER

EXPECTATIONS.

THE OTHER PART IS TO EXTRACT

DATA PRACTICES FROM PRIVACY

POLICIES.

TO TO THIS, WE USE TWO

ANNOTATORS.

WE HAD THEM ANSWER QUESTIONS

LIKE DOES THIS POLICY DISCLOSE

THAT THE WEBSITE COLLECTS HEALTH

INFORMATION.

NOW, TO SCALE UP, WE ARE ALSO

DEVELOPING TECHNIQUES THAT ARE

SEMI AUTOMATED AND USE NATURAL

LANGUAGE PROCESSING AND MACHINE

LEARNING THAT CAN GO AND EXTRACT

ANSWERS TO THESE QUESTIONS.

SO THE ANNOTATIONS SAY THE

WEBSITE IS CLEAR, WHETHER IT

ENGAGES IN A CERTAIN PRACTICE,

WHETHER IT'S UNCLEAR, THE POLICY

DOES NOT ENGAGE IN A CERTAIN

PRACTICE.

NOW, IT'S IMPORTANT TO NOTE THAT THERE CAN BE DIFFERENT TYPES OF MISMATCHES. I'M SHOWING YOU TWO. THE YES-NO MISMATCH. THE WEBSITE SESSION THAT YES, WE COLLECT YOUR INFORMATION, BUT THE USER THINKS NO, THE WEBSITE IS NOT COLLECTING MY INFORMATION. SO IN THIS CASE, THE USER MAY GO AHEAD AND ACTUALLY USE THE WEBSITE AND UNKNOWINGLY GIVE UP DATA. LOSE PRIVACY. AS IN THE NO-YES MISMATCH, THE WEBSITE SAYS NO, WE DON'T COLLECT YOUR INFORMATION BUT THE USER THINKS INDEED, THE WEBSITE IS COLLECTING MY INFORMATION.

IN THIS CASE, THE USER MAY

DECIDE NOT TO USE THE WEBSITE.

SO WEBSITES CAN COLLECT USERS' INFORMATION OBVIOUS WHEN THEY DON'T HAVE AN ACCOUNT. HOWEVER, USERS DON'T THINK THAT THAT HAPPENS. OR THEY DO NOT EXPECT THE DATA PRACTICE. SO COMPARE THIS WITH NO-YES MISMATCH. THIS IS A MISMATCH IN SHARING DATA PRACTICE. USERS EXPECT THAT WEBSITES WILL SHARE THEIR CONTACT INFORMATION FOR ANY PURPOSE. HOWEVER, WEBSITES DO NOT DO SO. THEY ONLY SHARE CONTACT INFORMATION FOR A SPECIFIED AND VERY NARROW PURPOSE. SO AS WE GO THROUGH DELETION, USERS PREDOMINANTLY EXPECT DELETION OF COLLECTED DATA, BUT WEBSITES GENERALLY DO NOT ALLOW THAT.

SO THERE CAN BE OTHER TYPES OF MISMATCHES AS WELL. ONE EXAMPLE IS A WEBSITE SPECIFIC MISMATCH. FOR EXAMPLE, USERS DO NOT EXPECT BANKING WEBSITES TO COLLECT HEALTH INFORMATION. DATA PRACTICES.

NOTICE THEY SHOWED INFORMATION ABOUT ALL 17 DATA PRACTICES. OR WE COULD SHOW INFORMATION ABOUT DATA PRACTICES WHERE THERE'S A MISMATCH BETWEEN WHAT USERS EXPECT AND WHAT WEBSITES DO OR ACTUAL DATA PRACTICES OF WEBSITES. THERE WERE MISMATCHES FOR 8 OUT OF THE 17. IF YOU SHOW 11, THAT WOULD BE **ABOUT 35% REDUCTION IN THE** AMOUNT OF INFORMATION THAT THE USER HAS TO READ AND PROCESS. WE COULD ALSO JUST SHOW INFORMATION ABOUT MISMATCHES THAT MORE PRIVACY INVASIVE FROM A USER STANDPOINT. I TALKED ABOUT THE YES-NO MISMATCH VERSUS THE NO-YES. IN THE CASE OF BANK OF AMERICA, IT'S ONLY FIVE DATA PRACTICES

FOR WHERE THERE'S A YES-NO MISMATCH. THAT WOULD BE 70% AMOUNT OF **REDUCTION FOR THE AMOUNT OF** INFORMATION SHOWN IN THE NOTICE. THE CAVEAT HERE IS THAT WE DO HAVE TO GO AHEAD AND TEST WITH USERS HOW EFFECTIVE THE SHORTSER NOTICES WILL BE. YEAH. SO AS PART OF FUTURE WORK, WE'RE PLANNING TO ALSO STUDY EXPECTATIONS IN THE DESIRED SENSE AND COMPARE THAT WITH EXPECTATIONS IN THE LIKELIHOOD SENSE AND MAKE -- ALSO COMPARE BOTH OF THEM TO DATA PRACTICES OF WEBSITES. AS I MENTIONED, WE'RE TESTING EFFECTIVENESS OF NOTICES THAT HIGHLIGHT MISMATCHED EXPECTATIONS AND SEE WHETHER THE USERS CAN MAKE BETTER PRIVACY

DECISIONS.

THAT WAS ALL.

THANK YOU.

[APPLAUSE]

>> THANK YOU, ASHWINI.

NEXT WE'LL HEAR FROM

**CO-PRESENTERS HEATHER** 

SHOENBERGER FROM THE UNIVERSITY

OF OREGON AND JASMINE MCNEALY

FROM THE UNIVERSITY OF FLORIDA.

THEY'LL BE PRESENTS ON CONSUMER

STANDARDS IN THE DIGITAL

CONTEXT.

>> SO GOOD MORNING.

THANK YOU FOR HAVING US.

OUR PROJECT IS ONLINE OR OFF

LINE VERSUS ONLINE, REEXAMINING

THE REASONABLE CONSUMER STANDARD

IN THE DIGITAL CONTEXT.

THE IMPETUS FOR THE PROJECT IS

TO GET A DEEPER UNDERSTANDING OF

HOW CONSUMERS ACT ONLINE.

WE KNOW FROM PRIOR LITERATURE

THAT PEOPLE, INDIVIDUALS ACT DIFFERENTLY SUPPOSEDLY OFF LINE THAN THEY DO ONLINE. SO WE WANTED TO TAKE THIS INTO A FURTHER EXPLORATION OF CONSUMERS. WE KNOW THE REASONABLENESS STANDARD IS A STANDARD THAT IS **USED IN -- FOR REGULATORS, FOR** EXAMPLE, IN ASSESSING COMPLAINTS **RELATED TO DECEPTION.** WE WANTED TO FIND OUT MORE AND EXPLORE THIS A BIT MORE. SO WE CAME UP WITH A UMBRELLA PROJECT THAT USED MIXED METHODS TO EXAMINE THIS QUESTION. ONE OF THE FIRST THINGS WE DID IS START TO INTERVIEW. SO WE DID QUALITATIVE INTERVIEWS. JUST TO SKIP FORWARD A LITTLE, THAT WE ASKED OUR INTERVIEWEES QUESTIONS RELATED TO HOW THEY

BEHAVE BOTH ONLINE AND OFFLINE. WE HAVE THIS QUOTE FROM AN INTERVIEWEE WHERE WE ASKED **QUESTIONS RELATED TO THEIR** EXPECTATIONS RELATED TO PRIVACY OR HOW THEIR INFORMATION WOULD BE USED AND HOW THEY ATTEMPTED TO CONTROL THEIR INFORMATION. SO WE ASKED ABOUT WHETHER OR NOT THEY SHOWED PHOTOS OFFLINE, IF THEY JUST MET A PERSON. SO IT'S A STRANGER. THEY INVITE THEM INTO THEIR HOME AND THEY BREAK OUT THEIR FAMILY PHOTO ALBUM. WE ASKED ABOUT THAT. THE INTERVIEWEE SAID, YOU KNOW, I'D WAIT FOR A FRIENDSHIP TO DEVELOP OFFLINE BEFORE SHOWING ANY PHOTOS TO SOMEONE IN PERSON. THIS SEEMS ALMOST DIAMETRICALLY OPPOSED TO WHAT THEY DO WHEN THEY PARTICIPATE ON, SAY,

INTERVIEWS.

WE HAD 30 PARTICIPANTS.

WE DID THESE LONG FORM

QUALIFIEDTATIVE INTERVIEWS.

WE HAD 20 WOMEN TO MEN.

THE AVERAGE AGE WAS 26.

WE HAVE SOME RACIAL DEMOGRAPHIC

DATA BROKEN DOWN AS WELL.

FOR OUR QUANTITATIVE SIDE, WE

DID A SURVEY.

WE'LL TALK MORE ABOUT THE

RESULTS OF THE SURVEY TODAY.

THERE WERE 871 PARTICIPANTS.

ALMOST EQUAL BREAKDOWN BETWEEN

MEN AND WOMAN.

BUT NOTE THE AGE.

WE HAD AN AGE OF 35.9.

SO ALMOST A TEN-YEAR AGE

DIFFERENCE ON THE SURVEY.

THE QUALITATIVE SIDE.

AGAIN, THE BREAKDOWN OF RACIAL

DEMOGRAPHICS.

ALSO IMPORTANT ARE SOME OF THE

INFORMATION.

SO THOSE ARE EXAMPLE QUESTIONS

ON HERE AS WELL.

AND THEN THE SECOND IMPORTANT

VARIABLE THAT WE ATTEMPTED TO

MEASURE ON A FOUR-ITEM SCALE IS

CONTROL.

OR HOW PARTICIPANTS PERCEIVED

THEY HAD CONTROL OVER THEIR

INFORMATION.

SO EXAMMATIROMATIR THED.002 Tc Tj EMC /P <</MCID 7 >>BDC P <4V-3(AT)-21(I)11(ON.)02 T

SIGNIFICANT WAS AGE.

THAT'S NO SURPRISE THAT IT'S

YOUNGER PEOPLE THAT PREDICTED

ALWAYS CLICKING YES.

WE'VE SEEN THIS IN NUMEROUS

REPORTS WHERE YOUNGER PEOPLE ARE

MORE CARELESS ONLINE, MAYBE MORE

APATHETIC.

AND WE HAD TWO SURVEYS THAT CAME

UP THAT HAVE ALSO BEEN USED IN

STUDIES BEFORE OURS AND SOCIAL

TRUST IN THIS CASE WAS NOT A

PREDICTOR BUT CONTROL EFFICACY

WAS.

THE BELIEF THAT THEY CONTROLLED

THEIR DATA PREDICTED ALWAYS

CLICKING YES.

WE BELIEVE THIS IS THE RESULTS

OF THE CONFIDENCE THAT PEOPLE

HAVE IF THEY BELIEVE THEY HAVE

CONTROL.

AS A RESULT THEY SAY, SURE

ENOUGH, I'M GOING TO GO AHEAD

## AND CLICK YES BECAUSE I'M

CONFIDENT AND TRUST THIS IS

IT WASN'T SIGNIFICANT. CONVENIENCE WAS A BIG VARIABLE OF ITEMS MADE UP LIKE THE POLICIES WERE TOO LONG. IT'S FASTER TO JUST SKIP THEM. THEY'RE FULL OF LEGALESE. SOME OF THE INFORMATION WE HEARD LAST NIGHT ABOUT HOW THE POLICIES ARE LADEN WITH TOO MUCH MATERIAL FOR CONSUMERS TO INGEST, ESPECIALLY IN THE OVER SATURATED ENVIRONMENTS WITH JOBS, ET CETERA. AND THE TWO IMPORTANT VARIABLES WERE CUES. ONE WAS SLIGHT APPEARANCE. IF THE SITE APPEARED TO BE SAFE AND NOT WEIRD, DIDN'T RAISE ANY SKEPTICISM. AGAIN, WE HAVE SEEN THIS IN PREVIOUS STUDIES. OUR PARTICIPANTS NOTED THIS IN THE INTERVIEWS AS WELL.

## PREDICTED CLICKING YES IF THE

SITE LOOKED SAFE AND ALSO WAS

FAMILIAR.

AND THEN JUST SIMPLE PRESENCE OF

A P

DISCONNECT BETWEEN PRIVACY CONCERN AND ACTUAL BEHAVIOR. WE MAY HAVE A POTENTIAL TO BRIDGE THAT WITH THIS RESEARCH. SO IN THE REGRESSION IS IN THE SAME FORMAT. HIGHER AGES AND HIGHER EDUCATION. NO SURPRISE. PREDICTED PRIVACY CONCERN, LOWER SOCIAL TRUSTS. PREDICTED PRIVACY CONCERN, LOWER CONTROL EFFICACY. BOTH IN LINE WITH PREVIOUS RESEARCH. PEOPLE WHO HAD HAD SUFFERED MORE NEGATIVE EXPERIENCES WERE MORE LIKELY TO SAY THAT THEY HAD MORE CONCERN. CONVENIENCE FELL OUT OF THIS MODEL AS A RESULT OF THE TWO CUES AT THE BOTTOM. THERE ARE DEFINITELY -- WITHIN

## THE SAME DIRECTION AS BEFORE.

## IF THE SITE HAD POOR AESTHETICS

POTENTIALLY ANOTHER DAY. IF WE MAKE REALLY CLEVER USE OF THE CUES AND THERE MAY BE MORE THAN THE ONES WE EXPLORED, BOTH ENTITIES THAT COLLECT DATAS, BUSINESSES, ADVERTISERS, THE GOVERNMENT, NEWS MEDIA THAT USE DATA CAN REDUCE PRIVACY CONCERN, WHICH IS SOMETHING THEY WOULD LIKE TO DO, ENCOURAGE THE FREE FLOW OF DATA, ANOTHER SOMETHING THEY WOULD LIKE TO DO AND SOMETHING THAT LAST NIGHT WAS MENTIONED AT THE FEDERAL TRADE COMMISSION POTENTIALLY INTERESTING IN DOING ALSO AND INCREASED TRUST AND ON THE FLIP SIDE CONSUMERS CAN RELY ON CUES MORE MEANINGFUL EVEN IF THEY DON'T READ THE PRIVACY POLICIES THAT UNDERLIE THOSE PARTICULAR CUES. SO WITH THAT, I REALLY HAVE TO

THOSE GUIDELINES IN ORDER TO USE

THE CUE ON THEIR SITES.

WHICH WOULD SIGNIFY SAFETY,

ET CETERA.

WE WOULD ALSO DO OUR RESEARCH ON

WHAT ICONS WOULD BE MOST

EFFECTIVE TO CONSUMERS AND ALSO

LINK THOSE ICONS TO READABLE

POLICIES.

ANOTHER THING THAT WE NOTED WAS

THE CONVENIENCE VARIABLE WAS

MADE UP OF ITEMS LIKE IT'S TOO

LONG, IT'S FEEL OF LEGALESE.

WE DON'T UNDERSTAND.

IF WE CAN MAKE THEM READABLE,

APPROACHABLE TO THE CONSUMERS,

WE COULD POTENTIALLY FOR THAT

SMALL SECT OF PEOPLE THAT WILL

READ THE POLICIES, THEY WILL

HAVE AN OPPORTUNITY TO MAKE

MEANINGFUL CHOICES AND IT WILL

BE SHORT, QUICK AND MORE

CONCISE.

SO IN CONCLUSION, WE ARE CONTINUING TO PINPOINT CONSUMER EXPECTATIONS OF PRIVACY IN A WAY TO DEVELOP THE GUIDELINES AND MAKE MEANINGFUL CHOICES IF THEY DO IN FACT READ THOSE. FINALLY SOMETHING THAT WE THINK IS REALLY IMPORTANT AND I'LL DIVERGE FOR A SECOND.

OUR OPPORTUNITY TO DISCUSS THE RESEARCH. WE'RE GOING TO TALK ABOUT PRIVACY BEING SPECIFIC DATA, THAT BEING GENETIC DATA. THE DATA THAT COMES FROM GENETIC TESTING. A VERY SPECIFIC TYPE OF DATA. WHAT WE HAVE TO REALIZE IS, GENETIC DATA IS THE MOST PERSONAL DATA OUT THERE. NOT ONLY IS IT A UNIQUE IDENTIFIER OF US INDIVIDUALLY, BUT BECAUSE OF THE FAMILIAR NATURE OF DNA, IT CAN ALSO **IDENTIFY OUR FAMILIES.** SO WHEN WE'RE TALKING ABOUT PRIVACY IN THIS CONTEXT, WE'RE TALKING ABOUT A MUCH BROADER CONTEXT. NOT JUST PERSONAL, BUT LOOKING AT THE FAMILY. WE ALSO KNOW THAT THIS DATA IS

INHERENTLY IDENTIFIABLE.

THERE'S GROWING RECOGNITION THAT

IT'S NOT POSSIBLE TO DE-IDENTIFY

THIS DATA IN A WAY.

MAY TAKE A GOOD SKILL SET, BUT

AS WE GET INCREASING NUMBERS OF

GENETIC DATABASES OUT THERE, AS

THERE'S MORE PUBLIC DATABASES,

WE KNOW THAT WE CAN REIDENTIFY

THAT DAY THAT.

THE OTHER THING IS, THIS DATA IS

IRREVOCABLE.

IF THERE'S BEEN A PRIVACY

WELL, FIRST THING WE HAVE TO **REALIZE IS THE DIFFERENCE** BETWEEN TRADITIONAL GENETIC TESTING, WHAT HAPPENS WHEN WE HAVE GENETIC TESTING IN A DIRECT CONSUMER SETTING. TRADITIONALLY GENETIC TESTING HAPPENS WITHIN A COUNTRY'S HEALTHCARE SYSTEM. AND THAT'S IMPORTANT BECAUSE WHEN AN INDIVIDUAL GETS THE GENETIC TEST IN THEIR HEALTH CARE SYSTEM, THEY'RE DEEMED A PATIENT. BY BEING CALLED A PATIENT, THAT LIVENS A WHOLE HOST OF PROFESSIONAL AND REGULATORY OVERSIGHTED, EXISTING DUTIES OF CARE AND THINGS LIKE DOCTOR-PATIENT CONFIDENTIALITY. SO ALL THE GOVERNMENT SYSTEMS FOR DATA PROTECTION OF HEALTHCARE KICK IN.

BECAUSE THAT'S A PATIENT. WHEN WE LOOK AT DIRECT CONSUMER GENETIC TESTING, WE HAVE TO REALIZE THAT ADD ITS CORE, THIS IS A COMMERCIAL TRANSACTION THAT OCCURS IN EACH COUNTRY'S MARKETPLACE. AND INCREASINGLY IN MARKET SPACE BECAUSE THE MAJORITY OF THE ACTIVITY IS ACTUALLY ONLINE. WHEN AN INDIVIDUAL ENGAGES WITH DTC, THEY ENGAGE AS A CONSUMER. WHAT THAT MEANS IS THAT ENLIVENS EACH COUNTRY'S PROTECTION LEGISLATION. IT ENLIVENS SOME CONTRACT NEGLIGENCE, ET CETERA. A VERY DIFFERENT SITUATION. WHAT DOES THE GENERAL PUBLIC THINK OF WHEN THEY THINK OF PRIVACY? AT THE CENTER FOR LAW AND GENETICS AT THE UNIVERSITY OF

TASMANIA, WE'VE BEEN LOOKING ATGENETIC PRIVACY ISSUES THE LAST20 YEARS.IN THE LAST FEW YEARS, WE'VEMOVED INTO DTC.SOME OF OUR EARLY RESEARCH INDIRECT CONSUMER GENETIC TESTINGSUGGESTED FROM THE AUSTRALIAN

THAT WAS AN INTERESTING EXERCISE.

AND FORCED THE THINKING TO GO BROADER THAN JUST THE CONSUMER COMPANY INTERACTION. WHAT WE REALIZED VERY QUICKLY WAS NOT ONLY DOES DNA GO A LOT OF PLACES, THAT SAMPLE TRAVELS FROM LAPS TO COMPANIES AND WHO KNOWS WHERE THROUGH THE POSTAL SYSTEM USUALLY, BUT ALSO THOSE RESULTS CAN GO PLACES. OKAY? THE ACTUAL GENETIC DATA ABOUT THOSE INDIVIDUALS GETS SPREAD AROUND. AND THAT INFORMED THE RESEARCH THAT I'M GOING TO TALK ABOUT TODAY, WHICH IS AN ONLINE PANEL OF 3,000 RESPONDENTS OF 1,000

AMERICAN, 1,000 AUSTRALIAN AND

1,000 U.K. RESPONDENTS.

WE JUST ADDED IN 1,000 JAPANESE

RESPONDENTS, WHICH WILL GIVE US

INTERESTING CONTRASTS.

THE WAY THE SAMPLE BROKE DOWN,

ABOUT 10% OF THE PEOPLE ARE

ACTUAL CONSUMERS.

THAT EQUATES TO THE EARLIER

ADOPTER CATEGORIES.

LEAST ABOUT 90% OF MY

RESPONDENTS THAT ARE THE

POTENTIAL CONSUMER.

WE'RE ABLE TO LOOK AT ACTUAL

VERSUS ABLE POTENTIAL CONSUMERS.

IF SOMETHING IS PRIVATE, IT'S

NOT SHARED.

IF IT'S SHARED, IT'S NOT

PRIVATE.

IN A SIMPLY WAY.

THAT'S HOW THE GENERAL PUBLIC

LOOK AT THESE THINGS.

PRIVACY ISSUES ARISE FROM

SHARING.

SO PRIVACY IS ALL ABOUT CONTROL

OVER SHARING.

PROVIDING YOUR PERMISSION TO SHARE MEANS THAT YOU HAVE CONTROL OVER YOUR PRIVACY. SO THAT'S THE WAY THE GENERAL THOUGHT THEY HAD PERCEIVED CONTROL.

WHAT IS INTERESTING IS ON ANY

DIMENSION THAT I ANALYZED ON,

AMERICANS ARE STATISTICALLY

DIFFERENT TO THE OTHER CONSUMER

GROUPS.

FOR THE U.K., IT'S 43%.

FOR AUSTRALIAN, IT'S 40%.

FOR JAPANESE, IT'S 36%.

SO THAT'S QUITE A DIFFERENCE IN

TERMS OF WHETHER OR NOT PEOPLE

THINK THEIR PERMISSION WILL BE

ASKED.

ARE THEY IN PERCEIVED CONTROL?

IF THEY ARE IN PERCEIVED

CONTROL, WHAT DOES THAT MEAN?

WELL, THEY'RE MORE LIKELY TO

PURCHASE THE DTC TESTS.

THEY'RE MORE LIKELY TO

PARTICIPATE IN DTC RESEARCH.

AND THAT'S IMPORTANT BECAUSE

THAT IS PERMISSION-BASED.

RIGHT?

THEY ASK THEIR PERMISSION.

DO THEY REALIZE THAT WHAT

THEY'RE DOING IS GIVING SPECIFIC

ENDURING CONSENT.

THEY'RE MORE LIKELY TO SHARE

BROADLY.

THEY'LL SHARE WITH FAMILY, NOT

FRIENDS.

SO THERE'S SOME CONTROL.

THEY'LL SHARE WITH THEIR

DOCTORS.

THAT'S IMPORTANT BECAUSE DTC

COMPANIES VERY CLEARLY STATE

THEIR RESULTS ARE FOR RECREATION

OR INFORMATION OR EDUCATION

ONLY.

THEY'RE NOT A DIAGNOSIS.

IF THEY GO BACK TO THEIR

DOCTORS, THEY'RE BACK IN THE

TRADITIONAL SYSTEM.

THEY'RE ALSO LIKELY TO ENGAGE

WITH ONLINE SHARING COMMUNITIES.

DOES PERCEIVED CONTROL EQUATE TO

ACTUAL CONTROL?

THESE ARE COMMERCIAL

TRANSACTIONS GOVERNED BY

CONTRACTS AND PRIVACY POLICIES.

WE DID SOME RESEARCH IN

AUSTRALIA LOOKING AT THE PRIVACY

POLICIES OF THE DTC COMPANIES

OPERATING THERE.

DO THEY COMPLY WITH OUR

LEGISLATION?

THE SHORT ANSWER, NO, THEY DO

NOT.

I'M NOW GOING TO HAND IT OVER TO

ANGELICA TO TALK ABOUT MORE

ABOUT CONTRACT TERMS.

>> WELL, I'VE BEEN LOOKING AT

THE CONTRACTS AND PRIVACY

POLICIES OF DIRECT CONSUMER

TESTS, COMPANIES THAT OFFER

TESTS FOR HEALTH PURPOSES.

NOW, AS HAS BEEN NOTED IN THE

PREVIOUS SESSION AND ALSO IN THE

PREVIOUS GROUP'S WORK, THESE CONTRACTS AND PRIVACY POLICIES APPEAR EVERYWHERE ONLINE. BASICALLY ANY WEBSITE YOU USE, ANY SOFTWARE UPDATE YOU MAKE WILL BE SUBJECT TO TERMS AND CONDITIONS. THEY'LL WILL BE PRESENTED EITHER AS TERMS AND CONDITIONS, TERMS OF USE, TERMS OF SERVICE, PRIVACY STATEMENTS, PRIVACY POLICIES AND SOMETIMES IN THIS CONTEXT, THEY COMBINED IN ONE DOCUMENT. AT PRESENTLY, THEY'RE USED NOT JUST TO GATHER THE PURCHASE OF DNA TESTS BUT ALSO USING THE WEBSITE AND SOMETIMES PARTICIPATION IN ANY RESEARCH THE COMPANY IS DOING. NOW, AS SEVERAL PEOPLE HAVE PREVIOUSLY NOTED, PEOPLE DON'T TEND TO READ THESE CONTRACTS AND PRIVACY POLICIES PARTLY BECAUSE

THERE'S SO MANY AND IT WOULD

TAKE TOO LONG.

THIS INDUSTRY IS NO EXCEPTION TO

THAT.

I WOULD ALSO SAY THAT SIMILARLY

TO MOST E-COMMERCE, THESE

CONTRACTS ARE NOT INDUSTRY

PACIFIC.

THEY DON'T NEEDILY ADDRESS ALL

THE ISSUES RAISED BY THE

INDUSTRY AND WHAT THEY'RE DOING

WITH DATA.

AND BECAUSE OF THE UBIQUITY OF

THESE CONTRACTS, CONSUMERS OFTEN

DISPLAY A POTENTIAL BLINDNESS

ONLINE.

WE MAY NOT READ THEM.

WE JUST CLICK ON AGREE.

THIS IS PROBLEMATIC IN THIS

CONTEXT.

I THINK THERE REALLY NEEDS TO BE

REFORM.

UNLIKE SOME OF THE OTHER -- WHAT WE SAID THAT CONSUMERS DON'T READ THESE, I'VE HAD TO READ 71 CONTRACTS. AND I REALLY THINK THERE'S PROBLEMS HERE. SO THE MAJOR PRIVACY RISKS IN THIS CONTEXT ARISE CHIEFLY FROM SHARING OR SALE OF SEQUENCE DNA. BUT ALSO FROM SHARING OR SALE OF OTHER TYPES OF PERSONAL DATA, OTHER DATA THAT COULD BE SENSITIVE. THIS IS BECAUSE COMPANIES ARE OFTEN ENGAGING IN ONGOING HEALTH RESEARCH. SO THEY'RE COLLECTING LARGE AMOUNTS OF PERSONAL DATA FROM CONSUMERS. THERE'S THE RISK OF POSSIBLE DISCRIMINATION BASED ON A PERSON'S GENETIC MAKEUP. AND THEN THERE'S OTHER RISKS.

SOME OF THESE ARE MORE FUTURE RISKS.

THERE'S A POSSIBILITY WITH THE

INCREASING USE OF BIOMETRICS

THAT IN THE FUTURE, THE GENETIC

DATABASES COULD BE USED FOR

IDENTITY THEFT, TARGETED

MARKETING, MOST OFTEN TARGETED

MARKETS OF DRUGS FOR FAMILY

GROUPS.

ALSO, THERE'S A POTENTIAL FOR

DISCRIMINATION IN EMPLOYMENT OR

INSURANCE IF THIS DATA IS SHARED

INAPPROPRIATELY.

MORE REMOTELY, THE RISK OF

CREATING SOME SYNTHETIC DNA.

NOW, AS I PREVIOUSLY NOTED,

THESE CONTRACTS ARE NOT INDUSTRY

SPECIFIC.

SO OFTEN YOU'LL ENCOUNTER THE

DOWNLOADING A SONG ONLINE. AND THEY ALSO USED SIMILAR WORDING. NOW, IN THE UNITED KINGDOM AND THE EUROPEAN UNION, THERE'S STRONG CONSUMER PROTECTION LEGISLATION THAT DEEMS SOME TERMS AND CONSUMER CONTRACTS TO BE UNFAIR AND UNENFORCEABLE. AT PRESENT, SOME OF THESE TERMS WOULD LIKELY BE DEEMED UNFAIR AND UNENFORCEABLE. THIS IS INTERESTING. I KNOW I'M AT THE FTC CONFERENCE. I'VE BEEN LOOKING MAINLY AT AMERICAN COMPANIES, BUT THE INFORMATION IS BEING SOLD INTERNATIONALLY. THERE'S A NEED FOR INTERNATIONAL COLLABORATION TO PROTECT CONSUMERS OF THIS CONTEXT. SO ONE OF THE MOST CONCERNING

THINGS HERE IS THAT CONSENT WILL OFTEN BE DEEMED FOR USE OR VIEWING OF A WEBSITE. OFTEN CONSENT TO ALTER TERMS WILL ALSO BE DEEMED THROUGH CONTINUING TO USE THE WEB SITE. AS MOST OF YOU ARE AWARE, IT'S OFTEN EASY TO USE A WEBSITE WITHOUT LOOKING AT THE TERMS AND CONDITIONS. SO THIS IS QUITE CONCERNING, **BECAUSE THIS -- THE OTHER THING** THAT IS VERY COMMON AND THE MAJORITY OF COMPANIES WILL **INCLUDE THIS AND 39% OF** COMPANIES INCLUDE A CLAUSE THAT ALLOWS THEM TO CHANGE THE TERMS AT ANY TIME. A SMALL PERCENTAGE, 6%, WILL ACTUALLY -- YEAH, 6% WILL NOTIFIED A PERSON OF E-MAIL OR CHANGES. MOST OF THE TIME COMPANIES WITH

CHANGE THE TERMS AT ANY TIME OR TIME TO TIME WITHOUT DIRECT NOTICE TO THE CONSUMER, THIS IS IMPORTANT HERE BECAUSE IT COULD HAVE AN IMPACT ON WHAT COMPANIES DO WITH YOUR DATA. THEY COULD CHANGE THE POLICIES ON SHARING SALE OR STORAGE OF DATA. AND THIS IS -- THIS CAN SIGNIFICANTLY IMPACT CONSUMERS. AS JEN MENTIONED PREVIOUSLY, AS A CONSUMER SERVICE, COMPANIES ARE OFTEN INCLUDING CLAUSES THAT SAY THE SERVICES ARE ONLY FOR **RESEARCH, INFORMATIONAL OR** SOMETIMES EVEN RECREATIONAL PURPOSES. NOW, IN THE CONTEXT OF HEALTH TESTING, I WOULD QUESTION WHETHER ANYONE ORDERS A BREAST CANCER RISK TEST FOR **RECREATIONAL PURPOSES.** 

AND QUITE A FEW OF THEM WILL SHARE DATA WITH LAW ENFORCEMENT, WHICH CONSUMERS MAY NOT BE AWARE OF. THERE'S BROAD SHARING WITH POTENTIAL THIRD PARTIES THAT MIGHT INCLUDE AFFILIATES. YES, I'M RUNNING OUT OF TIME. BUT I DO THINK THERE'S A NEED TO IMPROVE THESE CONTRACTS. WE'LL BE SPENDING ABOUT 20 MINUTES, WHICH I'LL BE LEADING WITH ALAN QUINN FROM THE INNOVATION FOUNDATION AND DARREN STEPHENSON FROM THE UNIVERSITY OF MICHIGAN AN STANFORD LAW

AND I NOTICE THREE COMMON THEMES IN YOUR ANSWERS OR YOUR FINDINGS. THE FIRST IS THAT NOTICE SEEMS TO BE FAILING. SO ANGELICA AND JASMINE'S PAPER TALK ABOUT THE UBIQUITY OF FORM CONTRACTS. THEY GIVE THE COMPANY WHOSE POLICY IT IS SOME SORT OF AN ADVANTAGE. **SERGE FOUND 75% OF PERMISSIONS** WERE BEING REQUESTED INVISIBLY. ASHWINI FOUND 40% WERE UNCLEAR IN THE POLICIES. ASHWINI, HEATHER AND JASMINE FOUND CONSUMERS WERE RELYING ON THINGS OTHER THAN PRIVACY POLICIES. THE SECOND THING IS THAT COMPANIES POLICIES AND PRACTICES AREN'T MATCHING UP WITH CONSUMER EXPECTATIONS.

THE BEST AND THE BRIGHTEST WORKING TO UNDERSTAND THE ISSUES AND PROVIDING US WITH THE BENEFITS OF YOUR LEARNING. WE'RE HOPING THIS CONFERENCE WILL FACILITATE FROM YOU BUILDING ON EACH OTHER'S WORK. WE HOPE TO BENEFIT FROM THE INSIGHTS YOU'VE GIVEN US ABOUT HOW TO BEST PROTECT PRIVACY AND INDUSTRY CAN HOPEFULLY DO THE SAME. AS CHAIR WOMAN RAMIREZ SAID, WE HAVE TO STAY UP TO DATE WITH THE FINDINGS ON PRIVACY, DATA RESEARCH AND PROTECT CONSUMERS. YOUR EFFORTS DEEPEN OUR URNING AND SPUR OUR OWN RESEARCH IN THAT RESPECT. SO THANK YOU ALL AGAIN FOR COMING AND SHARING YOUR THOUGHTS. WITH THAT, I'M GOING TO TURN IT

OVER TO MY CO-DISCUSSANTS. >> THANK YOU FOR THE FTC FOR LETTING ME COME HERE TODAY. I THOUGHT ALL OF THE DISCUSSIONS WERE THOUGHT-PROVOKING AND COULD HELP BUSINESSES BETTER UNDERSTAND THEIR CONSUMERS. WE'RE HERE TODAY AT THE FTC. WHAT I'M LOOKING FOR IS EVIDENCE OF THE NEED FOR PUBLIC POLICY INTERVENTION. FRANKLY I'M NOT SURE THAT THERE'S MUCH. AS WE WALK INTO THIS, THERE'S DEFINITELY A LOT OF DISCUSSIONS **OVER DIFFERENT PUBLIC** EXPECTATIONS VERSUS PRIVACY OR PEOPLE NOT UNDERSTANDING THE LEGALESE IN DIRECT CONSUMER GENETIC CONTRACTS. IS THAT A PUBLIC POLICY PROP? I'M NOT SO SURE. LET ME DRAW AN ANALOGY.

SAY I'M NOT NECESSARILY SURE WHAT GOES INTO MY CHIPOTLE BURRITO.

SURE, I CAN PICK DIFFERENT

FILLINGS AND I MAY BE ABLE TO

PICK DIFFERENT FILLINGS, BUT I'M

NOT SURE HOW THEY'RE SOURCED.

SO WHEN YOU ASK ME QUESTIONS

ABOUT WHAT IS IN MY CHIPOTLE

BURRITO, MY EXPECTATIONS MAY

DIFFER FROM THE REALITY OF

WHAT'S IN THERE.

THAT'S NOT NECESSARILY A PUBLIC

POLICY PROBLEM.

RIGHT?

REPORTS, I'M NOT NECESSARILY --I'M SEEING THAT WE'RE TALKING ABOUT WHAT IS IN THE PRIVACY BURRITO RATHER THAN TALK ABOUT THE PRIVACY FOOD POISONING. THAT'S FOOD FOR THOUGHT, I GUESS. I LOOK FORWARD TO A GOOD DISCUSSION. THANK YOU. >> I HAVE NO WAY TO CONNECT TO THE BURRITO. BUT WE WISH CHIPOTLE WELL WITH THEIR ISSUES. AT THE RISK OF STATING THE OBVIOUS, WE HAVE EVIDENCE AND STUDIES THAT SHOW THAT CONSUMERS HAVE EXPECTATIONS. ALL OF YOU IN THIS ROOM, YOU'RE NOT ORDINARY CONSUMERS. YEAR HERE AT PRIVACY CON. BUT WE'RE SEEING THERE'S CONSISTENT MEASURABLE

EXPECTATIONS.

REALLY ENJOYED THE STUDIES AND I ENCOURAGE YOU TO READ THEM IF YOU'RE NOT READ THE PAPERS. I THINK MOST OF THESE PAPERS HAVE SUPPORTED THIS NOTION OF CONTEXT YOU'LL INTEGRITY. IT'S POPULARIZED BY NISSANBALM AND OTHERS THAT ARE MEASURABLE AND CAN BE DEMONSTRATED. TWO COMPLICATIONS COME TO MIND. THE FIRST IS THE DIFFERENCE BETWEEN EXPECTATIONS AND PREFERENCES. IT WAS CLEAR IN PAPERS THAT THEY'RE CAREFUL TO DEFINE WHAT IS AN EXPECTATION. WHAT ARE WE STUDYING HERE AND TO CONTRAST THAT WITH CONSUMERS' PREFERENCES.

EXPECTATIONS BEING DIFFERENT

BE RESIGNED.

## SO EXPECTATIONS AND PREFERENCES

DIVERGE.

WHAT ARE WE MEASURING?

IS IT EXPECTATIONS OR WHAT THEY

PREFER?

THE PAPERS, A FEW OF THEM, WENT

BACK AND FORTH ON THAT.

A SECOND COMPLICATION THAT COMES

TO MIND ARE EXPECTATIONS OR

PREFERENCES, CONSUMER TASTES,

THIS IS A MOVING TARGET.

WE REPEAT ALL THESE STUDIES OF

CONSUMERS, WILL WE SEE THE SAME

EXPECTATIONS.

HOW CAN POLICY MEMBERS

INCORPORATE THIS MOVING TARGET

OF CONSUMER EXPECTATIONS.

I LOOK FORWARD TO THE DISCUSSION

HERE.

OPEN IT UP TO QUESTIONS.

IF YOU HAVE ANY RESPONSES TO OUR

COMMENTS.

>> I DON'T KNOW.

I LIKE THE BURRITO ANALOGY.

BUT AT THE SAME TIME, IF

CHIPOTLE HAS LEAN STEAK OR

WHATEVER THEY HAVE, RIGHT?

THEY -- IF THEY MAKE

REPRESENTATIONS TO THE CONSUMER

THAT IT'S FROM A CERTAIN SOURCE,

YOU HAVE EXPECTATIONS THAT HEY,

MY BEEF IS FROM A CERTAIN

SOURCE.

AND IF -- EVEN IF WE DON'T KNOW

EXACTLY WHERE IT'S FROM, WE HAVE AN EXPECTATION THAT WE SHOULD GET A PRODUCT OF SOME, I GUESS, QUALITY. OR AT LEAST WE EXPECT THE REGULATORS WOULD ENFORCE THEM --ENFORCE THE RESTAURANT GIVING US A PRODUCT THAT EITHER WON'T MAKE US SICK OR WON'T HAVE BEEN, YOU KNOW, HAVE SOMETHING DONE TO IT BY A WORKER THERE, RIGHT? SO I THINK THERE IS A CERTAIN SO REGULAR LAYERS, PARTICULARLY ON COLLEGE CAMPUSES, WHICH I THINK MOST OF US ARE USED TO, HAVE SAID, YOU KNOW WHAT? WE SEE PEOPLE WILL CUT ACROSS HERE ANYWAYS. BECAUSE THERE'S A POWER DYNAMIC THAT SKEWS IN FAVOR OF THE MOVING VEHICLE, LESS PUT ACROSS WALK HERE AND WE EXPECT THE CAR, THE BUS, THE WHATEVER, TO STOP

## DOES IT HAPPEN ALL THE TIME?

WE FOUND THAT THAT WAS NOT THE

CASE.

WHEN INTERVIEWING SUBJECTS, THEY

SAID, OH, THEY JUST ASSUMED THAT

FACEBOOK IS GIVING AWAY ALL THIS

DATA ANYWAY.

I MIGHT AS WELL GET A BENEFIT

FROM IT.

SO THAT'S THE LEARNED

SOMEWHAT MORE SUBJECTIVE.

SO YES, THE LAW MOVES VERY

SLOWLY.

TECHNOLOGY MOVES QUICKLY.

BUT I DON'T THINK -- I DON'T

THINK THE ISSUE IS MAKING THE

POLICIES AROUND SPECIFIC

TECHNOLOGIES.

THE ISSUE HERE IS NARROWING OR

CLOSING THE INFORMATION

ASYMMETRIES.

SO WHILE WE DON'T EXPECT PEOPLE

TO READ EVERY PRIVACY POLICY

THAT THEY ENCOUNTER, WE HAVE

SOME EXPECTATIONS ABOUT WHAT A

BUSINESS MIGHT BE DOING AS WE

POINTED OUT.

SO I DON'T EXPECT -- REGARDLESS

OF WHAT THEY SAY ABOUT WHAT FARM

THE BEEF CAME FROM, I DON'T

EXPECT IT TO HAVE E. COLI IN IT.

THAT'S NOT SOMETHING THAT THEY

NEED TO EXPLICITLY NEED TO

PROVIDE NOTICE FOR IT.

IT SHOULD BE EXPECTED THERE'S NO

E. COLI IN THIS BEEF.

I'LL LEAVE IT AT THAT.

>> I'D LIKE TO -- WE KIND OF RAN

OUT OF TIME A LITTLE BIT.

THERE'S REALLY A NEED FOR MORE

TRANSPARENCY IN THE INDUSTRY

WE'RE LOOKING AT.

IF YOU LOOK AT WEBSITE CLAIMS,

THERE WILL BE QUIT A GAP BETWEEN

WHAT THE CONTRACT ACTUALLY SAYS

AND WHAT THE WEBSITE IS

ENCOURAGING CONSUMERS TO BELIEVE

WHEN THEY ARE ENCOURAGING PEOPLE

TO PURCHASE THINGS.

BECAUSE THE INDUSTRY IS SO NEW

AND THE TECHNOLOGY IS CHANGING

SO FAST AND IT'S SO UNREGULATED,

A LOT OF TESTS COMING TO MARKET

HAVEN'T BEEN VALIDATED.

SO THERE'S A QUESTION ABOUT WHAT

THE CONSUMER IS ACTUALLY BUYING.

BECAUSE THE VALUE TO THE COMPANY IS THE SEQUENCE DNA, WHICH THEY'RE USING IN ON GOING RESEARCH OFTEN. SO THEY'RE SELLING A PRODUCT THAT GIVES THEM VERY PERSONAL DATA THAT THEY USE FOR A LONG TIME AND MAY NOT BE DESTROYING EVER POTENTIALLY. AND THE CONSUMER, AN ORDINARY IF A CONSUMER BRINGS IT IN. AT THE MOMENT, MOST OF THE TIME IT'S BEING EVALUATED AS A CONSUMER SERVICE. IN TERMS OF PARTICULAR WORRYING TERMS AND CONTRACTS IN SOME COUNTRIES AT THE U.K., THE OFFICE OF FAIR TRADING, WHICH IS NOW BEING DISBANDED BUT IS LIKE COMPETITION AND MATH, HAS A HISTORY OF WORKING WITH INDUSTRY TO TRY TO DISCONTINUE CERTAIN UNFAIR TERMS AS WELL. THAT'S WHAT I WOULD SAY. THERE'S SOME TERMS THAT SHOULDN'T BE IN THE CONTRACT BECAUSE IT'S MAKING IT'S A VER

## TO ENGAGE WITH THESE MUCH MORE

THE CONSUMER SOMETIMES HAVE VERY

WRONG OR INACCURATE MODELS THAT

ARE HELPFUL.

I'M CURIOUS IN THIS WORK, SINCE

YOU'RE STUDYING CONSUMERS'

PERCEPTIONS IF YOU SEE THE IN

ACCURAIES BENEFICIAL.

DOES THAT MAKE SENSE?

>> YEAH.

THAT WAS MY SLIDE.

I THINK THAT ONE OF THE BIGGER

PROBLEMS WITH NOTICE AND CHOICE

IS THAT THERE ARE -- I GUESS

THERE'S UNREASONABLENESS ON BOTH

SIDES.

SO THERE'S UNREASONABLE

EXPECTATIONS ON WHAT THE

CONSUMER SHOULD KNOW TO MAKE AN

ADEQUATE NOTICE.

IT'S UNREASONABLE TO EXPECT

EVERY CONSUME TORE READ EVERY

PRIVACY POLICY THEY ENCOUNTER.

AT THE SAME TIME, YES, PEOPLE

HAVE BAD MENTAL MODELS ABOUT WHAT IS HAPPENING WITH THEIR DATA WHEN THEY GO ONLINE. AND I THINK MAYBE THERE NEEDS TO BE SOME BETTER OUTREACH ON THAT ISSUE. AT THE SAME TIME, THAT GOES TO

ENFORCEMENT.

INSTEAD OF THINKING DID THE

COMPANY GIVE NOTICE AND WAS IT,

YOU KNOW, INCORRECT AND OUTRIGHT

MISLEADING, BUT YOU KNOW, IS IT

ALSO ADDING INTO THAT EQUATION,

IS IT REASONABLE TO EXPECT THAT

SOMEONE COULD ACTUALLY

UNDERSTAND THIS.

AND I DON'T THINK THAT'S

CURRENTLY BEING TAKEN INTO

ACCOUNT.

>> SO I'LL ANSWER THAT VERY

BRIEFLY.

AS FAR AS USING THE MENTAL

MODEL, FIRST OF ALL, I DISAGREE

THAT USING THEM ARE FALSEE. THEY'RE ALMOST ALWAYS CORRECT. WE LIE ON THEM ALL DAY LONG. WHAT WE'RE ARGUING FOR ARE --WE'RE GIVING CONSUMERS BACKED BY INFORMED AND CONCISE AND TRUE INFORMATION THAT THE FTC APPROVES. SO BY USING -- PROMOTING CONSUMERS AND ALLOWING THEM TO SEE WHAT THIS DATA MEANS, PROMOTING THE CUES TO THE CONSUMERS, IT GIVES THEM A MEANINGFUL CHOICE. IT'S NO LONGER SOMETHING THAT RISK IS AS MUCH OF AN ISSUE FOR. MORE IS SOMETHING THAT THEY CAN

HEARD THAT THE FINDERS ARE CONSUMER DEPENDENT. HOW WOULD YOU GO ABOUT TRYING TO DEVELOP SOMETHING THAT WOULD BE GENERALLY APPLICABLE? >> WE'RE IN THE PRELIMINARY STAGES OF DOING THAT. THIS WOULD BE SOMEBODY THAT WE'RE GOING TO TEST IN A LAB, LOOKING AT PEOPLE'S AUTOMATIC **RESPONSES IN ADDITION TO** SELF-REPORT. BUT THAT SAID, LOOKING AT HUERISTICS AND MAKING CUES THAT WERE IN LINE WITH GUIDELINES IS **BASED ON CONSUMER EXPECTATIONS** IS A DIFFERENT TYPE OF DATA COLLECTION. ENTITIES COULD OPT IN DEPENDING ON HOW THEY WERE COLLECTING AND USING THAT PARTICULAR TYPE OF

DATA.

THERE WOULD BE A CONTINUUM OF

ICONS OR CUES THAT YOU COULD USE AND THEN IN ORDER TO USE THAT ON YOUR SITE OR WITHIN YOUR MATERIALS, YOU WOULD HAVE TO ADOPT THE FTC'S GUIDELINES THAT WENT WITH THAT PARTICULAR ICON. YOU WOULD TEST EVERY ELEMENT OF THAT. SO THE ICON ITSELF WOULD HAVE TO BE SOMETHING THAT WE WOULD TEST THAT CAUGHT SOMEONE'S EYE. PEOPLE DIDN'T NOTICE SOME OF IF PRIVACY POLICIES. THAT'S SOMETHING THAT YOU CAN CORRECT WITH BETTER WEB DESIGN. >> WE HAVE ABOUT 20 SECONDS LEFT. I'D LIKE TO GIVE YOU AN OPPORTUNITY TO ASK LAST QUESTION. >> SO TO FOLLOW UP ON WHAT DARREN SAID WITH HOW PRIVACY CONCERNS HAVE MORPHED AND

CHANGED OVER TIME.

THE ITIF RELEASED A REPORT THAT

CRACKS THIS.

BUT I WANTED TO SEE SEVERAL

DIFFERENT INDUSTRIES UP HERE

HAVE -- THAT YOU CITY DIDDED

HAVE CHANGED OVER TIME.

SOME HAVE CHANGED LIKE GENETIC

TESTING.

ANDROID IS ON ITS SIXTH RELEASE.

CAN YOU TALK ABOUT IF YOU'VE

SEEN EXPECTATIONS CHANGE OVER

TIME.

>> ME?

I THINK ONE OF THE THINGS WE

HAVE TO ACKNOWLEDGE IS THAT

WE'RE MOVING INTO THE

COMMERCIALIZATION OF HEALTH.

WE'RE MOVING INTO THE

MONEYIZATION OF HEALTH DAN --

DATA.

AS WE MOVE INTO THIS WHETHER

IT'S DIRECT CONSUMER GENETIC

TESTING, WHETHER IT'S THE DATA COMING FROM YOUR FIT BIT, WHETHER IT'S INFORMATION ON YOUR SHARING WEBSITES, THINKING YOU'RE JUST MEETING FOLKS OUT THERE THAT HAVE THE SAME COMPLAINTS YOU DO AND LET ME TELL YOU WHAT HAPPENED WITH THE LATEST DRUG, THIS IS NOW BEING MONETIZED. THIS IS IN THE CORPORATE SPHERE AND OUR PROTECTIONS OF THE PROTECTIONS OF THE DATA WERE CREATED FOR THE TRADITIONAL HEALTHCARE SYSTEM. WE HAVEN'T MADE THE MOVE OVER INTO LOOKING AT ANYTHING INDUSTRY SPECIFIC AS WE MOVE INTO THIS NEW FORM OF COMMERCIALIZING HEALTHCARE AND ALSO MONETIZING HEALTH DATA. >> SO ONE THING THAT WE'VE LOOKED AT IS TRYING TO

**RELATIVELY WEIGH DIFFERENT USER** CONCERNS BASED ON THE TECHNOLOGIES. SO I GUESS GOING TO THIS ISSUE OF WHAT POLICY IS NEEDED AND POLICY MOVES SLOWLY AND TECHNOLOGY MOVES FAST. WHILE PEOPLE HAVE PRIVACY EXPECTATIONS, THERE'S SOME THINGS THAT PEOPLE WILL THINK OF AS UNIVERSALLY BAD OR UNIVERSALLY UNCONCERNING. SO WE DID THIS STUDY THREE OR FOUR YEARS AGO. WE CAME UP WITH A WHOLE SLEW OF **RISKS RELATED TO SMART PHONE** USAGE SUCH AS AN APP THAT USES DATA FOR X OR SHARES DATA WITH CERTAIN PARTIES. AND WE HAD PEOPLE RANK THOSE. THIS PAST YEAR WE DID A FOLLOW UP STUDY TO THAT WHERE WE CAME UP WITH SIMILAR RISKS RELATED TO

CONFERENCE.

FOR ALL OF YOU IN THE AUDIENCE, OUR CAFETERIA WON'T BE OPEN BUT THERE ARE BOXED LUNCHES AVAILABLE. YOU MAY EAT YOUR LUNCH IN THE OVERFLOW CONFERENCE ROOMS ACROSS THE HALLWAY. FOOD IS NOT PERMITTED IN THIS AUDITORIUM, NEITHER ARE BEVERAGES EXCEPT FOR WATER. IF YOU LEAVE THE BUILDING, SAVE TIME TO COME BACK THROUGH SECURITY ON YOUR WAY IN. IF YOU DON'T HAVE ELECTRONICS WITH YOU WHEN YOU GO THROUGH SECURITY, THE SCREENING WILL BE FASTER. I'VE BEEN TOLD THERE'S A GUARD HERE AND THAT THE ROOM WILL BE LOCKED TO LEAVE YOUR ELECTRONICS.

THANKS FOR COMING.

WE'LL SEE YOU BACK AT 1:00 P.M.