

FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 10580

September 2, 2009

Thank you for your letter dated August 31, 2009 discussing Google's privacy policies and their applicability to the Google Books project. Your letter responds to our request for information concerning the steps Google will take to protect consumers' privacy in connection with Google Books.

As we have discussed, we recognize that Google Books offers consumers access to numerous publications that currently are difficult to obtain. At the same time, however, we have concerns about Google gaining access to vast amounts of consumer data regarding the books consumers search for, purchase, and read. Given these concerns, we asked that, to the extent Google will use consumer data collected through Google Books to deliver targeted advertising, Google publicly commit to complying with the FTC's self-regulatory principles for online behavioral advertising.¹ Additionally, we requested that Google disclose the nature and extent of any secondary uses, outside of behavioral advertising, of data collected through Google Books.

Your letter states that, although Google does not currently engage in behavioral advertising with respect to Google Books, Google will adhere to the FTC's self-regulatory guidelines if Google decides to do so in the future. With respect to the other uses of data collected through Google Books, your letter states that Google's existing privacy policy governing how it handles consumer data applies to Google Books. Under that privacy policy, Google only shares "personal information," as you define that term in the policy, when the consumer tells Google to do so or in certain other narrow circumstances. In addition, users of Google Books are not and will not be required to have a Google account or register with Google to use most Google Books features, although an account will be required to access books that a user has purchased. Finally, your letter explains that Google is in the process of creating a specialized privacy policy specific to Google Books.

