

**Summary of Presentation by TRUSTe**  
GLB Interagency Meeting on the ANPR on Privacy Notices  
February 18, 2004  
Federal Trade Commission Conference Center

Participants:

Fran Maier, Executive Director and President, TRUSTe  
Becky Richards, Compliance and Policy Director, TRUSTe  
Martha Landesberg, Senior Policy Advisor, TRUSTe

Comments:

The speakers provided a hand-out to the agencies, entitled "Privacy Notices." The primary expertise of TRUSTe is the Internet. TRUSTe certifies privacy practices, writes privacy policies, and has extensive experience with both regulated and non-regulated companies.

Ms. Landesberg provided background information on TRUSTe, its work in helping businesses follow best practices in auditing and describing information practices, and observations on a "highlights" notice. She commented that surveys have shown particular consumer concerns about identity theft, information sharing, and spam. She discussed the seal program – the types of companies that use the TRUSTe seal, their ongoing monitoring program, and seeding program to ensure certification compliance.

Ms. Landesberg discussed the issue of trust and the impact of a seal program. She spoke about the TRUSTe standards: to provide good notice, good choices, and to provide choice for third party sharing for any secondary uses including marketing, whether the sharing is with an affiliated or nonaffiliated third party. She said that TRUSTe has been testing the effect on response rates of emails sent from sites with a seal and found measurable differences.

Ms. Landesberg made the following observations on Appendix A: the "yes" and "no" answers are unclear; she proposed changing the text to make affirmative or negative statements on the applicable practice. She thought "corporate family" is a good term to use. The italicized language is too busy.

Communicating choice is a more important feature of the notices than comparability. TRUSTe does not view the food label analogy as the proper comparison. Privacy is more contextual.

They would like to see testing of vocabulary – what do the words mean. For example, the word "limit" doesn't convey how much or what sharing the consumer can stop.

