

Contract #FTC09H9117

Web-based Financial Privacy Notice Final Summary Findings Report

Presented to
U.S. Federal Trade Commission

October 29, 2009

By
Kleimann Communication Group, Inc.

Kleimann Communication Group, Inc.
1321 Rhode Island Avenue, NW
Washington, DC 20005

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Background

The Gramm-Leach-Bliley Act (GLBA) requires financial companies to provide their customers with privacy notices that clearly, conspicuously, and accurately state their privacy practices. These companies must also provide a means for consumers to opt out of certain types of information sharing if the company shares for those reasons. The notices that financial companies mailed to consumers, as a result of this requirement, were often lengthy, varied in how they informed consumers of their rights, and were generally confusing to consumers.

In 2004, the federal agencies¹ (collectively “the Agencies”) that enforce the GLBA began a multiphase project to develop a paper-based, alternative financial privacy notice prototype. The alternative prototype needed to meet the GLBA requirements and be easier for consumers to understand and use. The paper-based development had three phases:

- In Phase 1, the Agencies contracted with Kleimann Communication Group (Kleimann), a communication research company, who developed a high-performing prototype privacy notice using qualitative consumer research techniques.
- In Phase 2, the Agencies contracted with Macro International to conduct a quantitative data collection study. Results from this study prompted changes to the paper-based notice and led to testing of the revised notice to validate these changes.
- In Phase 3 validation testing, the Agencies again contracted with Kleimann to develop and validate the best design for incorporating opt-out options onto the bottom of the notice’s first page.

Subsequently, the Federal Trade Commission and Federal Reserve Board contracted with Kleimann to convert the paper-based financial privacy notice prototype to a web-based notice prototype. This report summarizes the formative development and cognitive usability testing conducted across nineteen participants to develop this web-based notice.

¹ The six federal agencies that initiated the project are: Board of Governors of the Federal Reserve System, Federal Deposit Insurance Corporation, Federal Trade Commission, National Credit Union Administration, Office of the Comptroller of the Currency, and the Securities and Exchange Commission. The Office of Thrift Supervision joined the project for Phase 2 and 3 research.

Objectives and Considerations

Project Objectives

The project objective was to create a web-based notice that (1) can be used by financial companies as a customized online version of their paper financial privacy notice while (2) maintaining the same high consumer comprehension and performance levels as the original paper-based notice.

Challenges and Considerations

Transitioning the paper-based notice into a fully usable web-based version required more than just moving the language and layout from page to screen. To take full advantage of the opportunities of the web medium, Kleimann re-conceptualized the information. Through this process, Kleimann faced a number of challenges, such as moving from a linear, static environment to a more layered and dynamic one. While developing the web-based notice, Kleimann considered (1) the way consumers use information online versus on paper (2) the technical requirements and constraints of web design and (3) those qualities and elements of the paper version necessary to retain in transitioning to the web.

Online information use

Consumers use information on the web in different ways than they do on paper. Furthermore, the way individual consumers use information also differs within the online environment. Throughout the project, Kleimann observed the following patterns in the way people use information online and used these observations to inform our final design:

- Users navigate web pages in different ways.
- Users generally skim, rather than read, text online.
- Most online users gravitate first toward visuals.
- Users expect page elements to follow certain online conventions.

Technical requirements and constraints

In addition to considering the way consumers use information online, Kleimann worked within specific technical requirements and constraints. These required that the notice be

- designed to allow for customization,
- programmed with universal and customizable programming languages,
- viewable on most popular screen resolutions (1024 X 768),
- functional on the most popular web browsers (Internet Explorer 6-8, Mozilla/Firefox, Safari), and
- Section 508-compliant (requirements for accessibility of electronic information).

Transition Goals

Finally, the web-based notice needed to maintain the standards of usability and consumer performance set with the paper-based notice. To track these standards, Kleimann considered the following project goals in transitioning the notice from paper to the web in the following areas:

- **Comprehension**
 - the notice purpose is clear
 - whole-to-part comprehension remains strong with the online restructuring of the notice
 - key components remain effective with the online restructuring of the notice
- **Design**
 - the notice maintains objective language and presentation
 - the restructuring of the notice online does not change the hierarchy of key components
- **Navigation**
 - participants are able to locate key components of the notice
 - participants are able to use the online functionality of the notice to locate necessary information
 - the Table remains the focal point of the notice
- **Task Completion**
 - the notice allows consumers to compare and identify differences in sharing practices across companies
 - the notice enables consumers to understand how to opt out

Web-based Financial Privacy Notice Prototype (web-based notice)

The final web-based financial privacy notice prototype successfully meets the objectives of this project. Below is an overview the final notice.

The diagram illustrates a web-based financial privacy notice prototype with the following components:

- 1 - Title:** "What does [name of financial institution] do with your personal information?"
- 2 - Instruction box:** "Three steps to find out: 1. Click on each fact to learn what financial companies do with your personal information. 2. Use the table to understand [name of financial institution]'s sharing practices and if it offers the option to limit sharing. 3. Read the frequently asked questions for additional information."
- 3 - Fact boxes:** Four boxes labeled Fact 1 through Fact 4, each containing a short paragraph about data sharing.
- 4 - Table:** A table with three columns: "Reasons we can share your personal information", "Does [name of financial institution] share?", and "Can you limit this sharing?". It lists various purposes like "everyday business purposes", "marketing purposes", and "joint marketing with other financial companies".
- 5 - "Limit" link:** A callout pointing to the "Limit" link in the table's third column.
- 6 - Definition links:** A callout pointing to the "Limit" link in the table's third column.
- 7 - FAQs:** A section titled "Frequently Asked Questions" with expand/collapse functionality and a list of questions.
- 8 - Questions:** A section titled "Questions?" with a contact form for phone number and website.

1	2	3	4	5	6	7	8
Title gives context to the information and creates interest for the reader to continue to read.	Instructions give further context and explain how to use the web-based notice.	Fact boxes present key information in a highly visual format. Functionality guides users through the Table.	Prominent Table placement implies hierarchy. Rounded corners provide visual unity.	Links to embedded "limit" information provides immediate access to limiting options.	Links to definitions provide proximity and immediacy for additional information.	Expand/collapse functionality gives the user flexibility and saves overall space.	Section with contact information allows multiple methods for user to contact company with any questions.

Research Methodology

The design and testing of the web-based notice took place in two phases. Phase 1 involved three rounds of rapid prototyping used to develop the initial design and functionality of the web-based notice. Phase 2 involved three rounds of cognitive testing to refine this design and enhance the functionality.

Formative Development and Testing

In July 2009, Kleimann conducted three rounds (8 participants total) of low-fidelity formative prototyping at its offices. Low-fidelity rapid prototyping is a type of formative development that tests low-tech versions of the information with consumers.² These three rounds focused on developing a web-based design and functionality that maintained comprehension and ease of navigation while transitioning from the original paper-based notice. This method allowed for rapid development, testing, and revision of the notice to isolate general and significant comprehension and navigation problems before the notice underwent more costly and time-consuming programming.

For each round of testing, Kleimann developed notices for fictional banks. Each formative test session involved an unstructured review of the notice by the participant, guided questions facilitated by a moderator, and a number of participant tasks. Testing sessions lasted approximately 90 minutes. Kleimann revised the formative notice after each round.

Cognitive Usability Testing

Once Kleimann determined the basic design and functionality through formative testing, it transferred the notice into a higher-fidelity programmed format for cognitive usability testing online. Between August and October 2009, Kleimann conducted three cognitive usability test rounds (11 participants total), using Morae data collection software at a professional testing lab in Reston, VA. The fully programmed web-based versions allowed Kleimann to accurately test functional components and probe any comprehension issues that arose as it restructured and revised the notice. The structure of the cognitive usability testing was similar to the formative round, with the addition of a comparison component between two notices with different sharing practices and several closing questions designed to gauge the participants' attitudes toward information sharing.

² Tested notice versions for formative rounds 1 and 3 were mocked up in Microsoft Word. Kleimann mocked up the tested notice version for formative round 2 in Adobe Acrobat.

Testing Participants

Participants for all six rounds of testing met a targeted set of demographics, namely that they (1) spoke English fluently (2) used the internet on a daily basis and (3) had participated in online banking.

The demographic emphasis for formative rounds was on high web literacy to gain targeted feedback, ensuring that the newly developed web design worked on a basic level. As such, recruiting was less formal and more focused on web aptitude over targeting a spread of traditional demographics. For the three cognitive usability rounds, our participants were a mix of age, gender, income, education level, and ethnicity (See Appendix A) to ensure a broader audience could use the notice.

Data Analysis

To determine findings in both phases, Kleimann used a collaborative debrief and triangulation process. Using the triangulation process, Kleimann analyzed data from three different analysts (a moderator, note taker, and observer) to confirm findings through convergence of these different perspectives.

Summary of Findings

This section summarizes key findings around comprehension, design, navigation, and task completion from three formative and three cognitive usability rounds of testing. Overviews of findings from each round are located in Appendix C.

Comprehension

Overall participant comprehension of the web-based notice was strong.

General comprehension

Participants understood the purpose of the notice. When asked to state the main point of the notice in a few sentences, participant responses illustrated a high level of comprehension around the company's sharing practices.

The main point is to let the consumer know how their info is shared and with whom...
(VA-02)

To let people know in plain English what they are going to do with info sharing to make people feel confident that it's safe to share info with their bank. (VA-10)

The notice preserved whole-to-part comprehension. Participants' responses showed they understood (1) that all financial companies share (2) how the individual bank shares and (3) if they could limit sharing.

I can give you the reasons they give for sharing it, the groups of people they're sharing with, whether or not you can limit that sharing. (VA-01)

All financial companies need [to share]...understandable. Next block says banks choose up to a point. Maybe bank A shares more than B. I didn't know that before. (VA-10)

Introductory context

Participants required some introductory context to get into the web-based notice but needed only minimal information. Early testing showed that too much text above the Table interfered with comprehension. As a result, Kleimann first explored the idea of removing all contextual information above the Table to see if that information was necessary at all in the web-based notice. However, testing showed that when the notice gave no upfront information, participants had difficulty grounding themselves in the information, causing comprehension to drop. As a result, Kleimann made three changes to the notice by (1) inserting three instructional steps at the beginning on how to read the notice (2) creating Fact boxes to hold key contextual information and (3) moving remaining information to the FAQs.

Instruction box

The three simple instructions helped participants know how to navigate and use the notice. Some participants thought the introduction should provide the purpose of and explain how to use the notice, especially because it differed from other privacy information they had seen on the web. The “three steps” instruction box allowed participants to use the instructional steps to quickly and easily get into the notice and understand the key purpose.

[The steps are] telling me how to navigate. (VA-09)

Fact boxes

The Fact boxes facilitated participants’ ability to understand the contextual concepts of general financial sharing and the specific sharing choices by a financial company.

Initial cognitive usability testing suggested that some participants had trouble understanding the difference between financial sharing in general and a specific company’s choices and practices. To help participants see and understand these key contextual concepts more easily and connect them to the Table information, Kleimann placed each of the following “facts” about financial companies in separate boxes above the Table:

- Fact 1: Financial companies can share customers’ personal information for particular reasons.
- Fact 2: All financial companies share customers’ personal information to run their everyday business.
- Fact 3: Financial companies choose the reasons they share customers’ personal information.
- Fact 4: If your financial company shares your personal information, you may have the option to limit sharing.

When participants clicked the Fact boxes, each box highlighted the corresponding concepts in the Table. Testing showed that this design and functionality helped participants make the cognitive link between the facts about financial companies and the practices outlined in the Table.

Kind of tells you where financial companies stand. Facts are definitely important. (VA-09)

[The facts] highlighted what you need to see. (VA-05)

Furthermore, testing also showed that the Fact boxes helped comprehension even if participants did not use the highlighting functionality.

This highlighting is helpful but didn’t need it to understand the table. (VA-10)

Table

Participants immediately gravitated towards the Table and used it as their primary source of information. Because it was a strong visual focal point, the Table functioned as the heart of the web-based notice. Participants used and understood the Table as the key source of information.

First thing that drew my attention was the table because I thought it would answer all of my questions. (VA-02)

Participants understood the information in the Table. Participants could discern that companies shared for different reasons, whether their company shared, and if they could limit that sharing.

Aspen does not give you the opportunity to limit. But they only shared with first two [reasons]. Birch shares for joint marketing, affiliates, nonaffiliates. But you can limit it. (VA-05)

I guess [the table] is giving a breakdown of the various organizations they can share with and with the different purposes. (VA-07)

Limiting sharing

Participants understood their limiting options with opt-out and no-opt-out scenarios.

When working with the full sharing notice (Birch Bank), participants understood they could limit certain sharing, for which reasons they could limit, and how to go about limiting that sharing. Although some participants said they were confused by the wording of the “we don’t share” phrase in the less sharing notice (Aspen Bank), most participants understood that they weren’t able to limit for those reasons because the bank did not share.

Birch will, by default, share your info. You have to tell them otherwise. Aspen doesn't share so you don't have to worry about it. (VA-01)

They (Aspen) have some no's in the do they share (column). You can't limit sharing if you don't share. (VA-11)

Some participants didn’t understand the distinction between being able to limit certain sharing because federal law required the opt-out versus not being able to limit other sharing. Participants clearly understood what sharing they could and could not limit. Some participants, however, didn’t understand why they could limit some sharing and not other sharing.

I would be confused because it's telling me federal law gives me the right to limit only [three reasons listed], so for joint marketing it's not giving me that option. (VA-03)

I can't do anything about limiting some information. I would want to know more about why. (VA-07)

Definitions

Embedding definitions directly in the Table allowed participants to access the definitional information immediately and in context. Participants readily saw and used the “joint marketing,” “affiliates,” and “nonaffiliates” links to understand the concepts. By locating the definitions as popups in the Table, participants could understand them in context instead of having to move to a different location to answer questions as they did in the paper-based notice and early drafts of the web version.

[The definitions were] very helpful. I didn't know what “joint marketing” was. I know what “affiliates” means, but when clicked, it says who they were if you didn't know. They were just straightforward; when you click on them the answer was right there.
(VA-06)

The “personal information” definition link wasn't always visible to participants in the initial design. In early designs, Kleimann embedded a stand-alone definition for personal information in the header row of the Table. Testing found that participants tended to overlook this placement of the personal information link. Kleimann then relocated the link in the Instruction box and bolded its text. Kleimann also added an FAQ containing the definition for personal information, providing multiple opportunities for users to read the information. When participants did access the personal information definition, it always helped them better understand the notice.

[The information listed in the personal information definition box] was exactly what I was looking for under limiting, to tell me what information I can limit. (VA-11)

Frequently Asked Questions

The term Frequently Asked Questions (FAQs) worked well for participant understanding of that section. Participants understood “frequently asked questions” as a common term and web element whose purpose and use they were familiar with.

I like FAQs...I think that's [FAQs are] important (VA-04)

A lot of times that's [FAQs] where I'll go if I don't know something about a company or before you agree to commit to something (VA-06)

Participants understood the FAQs and used them as supplementary information.

Though most participants did not need the FAQs to understand the information in the Table, they generally understood the information in the FAQs.

[The FAQs] help clear up your basic questions. (VA-01)

Yes [the FAQ section was helpful]. It tells me why I can't limit, do they continue to share, and how they protect. (VA-05)

Some participants didn't think the FAQ answers always provided enough information

[The "information protection" FAQ] doesn't really tell me how ..., doesn't really go into detail. (VA-06)

Federal law

When located above the Table in the web-based notice, the federal law statement that provides context for receiving the notice undermined participant understanding of the bank's sharing practices. Participants did not need the federal law context up front in order to understand the information in the Table. In fact, it sometimes confused their understanding of a company's sharing practices and whether the financial company offered a limit option.

It says federal law gives the right to limit but then there isn't any ways [sic] to limit sharing. This is confusing. (VA-04)

To address this confusion, Kleimann relocated the federal law statement below the Table, in the FAQs. Moving this information helped lessen participant confusion by allowing participants to focus on the banks' sharing practices and their limiting options in the Table.

The federal law information helped participants understand why they were receiving the notice. While removing the federal law context aided participant understanding of the bank's sharing practices, the deletion created confusion for some participants about why the company was providing the notice in the first place. After first placing the statement at the bottom of the notice, Kleimann ultimately added an FAQ titled "Why is [name of financial company] providing this information?" The new FAQ ensured access to the particular information and kept the overall notice design consistent.

[They are] Required by law to provide this. (VA-11)

Design integrity

The design of the web-based notice worked well. Participants were quickly drawn into the design and remarked that the information was clear, understandable, and readable. To move the notice from paper to the web, Kleimann ensured that, (1) the notice maintained neutral and objective language and presentation, and (2) the online restructuring of the notice did not change the hierarchy of key components.

Clear language and consistent design maintained the information's neutrality.

Participants generally thought the language was clear and that the notice was more succinct and direct in its disclosure than other financial privacy information they had seen online. In addition, testing showed that consistency of the design—regardless of the companies' sharing practices—was important in promoting comparison.

It's a lot more clear. Normally privacy policies are just words, [this is] more visually appealing. Easy to read. (VA-01)

[The notice] lets people know in plain English what they are going to do with information sharing. (VA-10)

The single-screen format organized by Instruction box, Fact boxes, the Table, and FAQs maintained the hierarchy of key content components. Transitioning from a two-page paper design to a single-screen layout required some content and design adjustments, but the notice ultimately maintained the same hierarchy of information. The single-screen layout in the web environment actually facilitated access to the visual focal point and key information of the Table. The single-screen layout also allowed the supplementary information to be in a location that was easily accessible but not in competition with the primary information.

Everything is concise and on one viewable page. (VA-02)

Everything is all on the page. Easy to navigate. (VA-07)

Specific design elements ensured that embedded information was accessible and usable without being distracting or causing bias. The dynamic nature of the web allowed for relocating and embedding important information in contextually appropriate areas of the notice. For instance, the design of the “limit” link and opt-out information, the personal information definition, and the definitions of “joint marketing,” “affiliates,” and “nonaffiliates” ensured accessibility and usability, but didn’t dominate or interfere with participant understanding of the banks’ sharing practices.

Very helpful...you just click on it...everything is right there. (VA-03)

Navigation

Users navigate information online differently than they read paper. The online environment provides unique opportunities for structuring, arranging, and laying out information. Testing showed that no one interacts with the information in the same way online, but visuals are a powerful and effective focal point. To maintain easy navigation in the move from paper to online, Kleimann ensured that (1) participants were able to locate key components of the notice (2) participants were able to use the online functionality of the notice to locate necessary information and (3) the Table remained the focal point of the notice.

General navigation

Some participants read introductory text and some didn't. Many participants skipped over the introductory text and returned to it only if they had questions or were confused. However, when participants did read the numbered steps at the beginning of the notice, the steps provided them with (1) an advance organizer previewing the different elements in the notice (2), a quick overview of the notice purpose, and (3) instructions on how to use the

notice's core functionality. The simplified introductory steps also countered the problem of too much information upfront interfering with participants' ability to get to the key disclosure information.

Participants first gravitated toward the visual focal points in the web-based notice.

Most participants immediately gravitated toward the Fact boxes and the Table. Consequently, participants generally used those sections as their primary source of information before exploring the rest of the information.

First thing looked at? "Facts." Probably important. (VA-09)

Your eyes are immediately drawn to it [the table]. (VA-05)

Functional elements such as buttons and popup boxes facilitated participants' navigation through the financial privacy information. These functional elements enabled the design to layer and integrate information. Participants immediately navigated to different parts within and outside the notice and more easily accessed information the moment they needed it.

That's nice how it [definition] just pops up and doesn't bring you to another page or anything. (VA-01)

Very helpful, you just click on it everything is right there, you don't have to click on a lot of stuff. (VA-03)

Homepage link name

"Personal information," "sharing," and "practices" emerged as the key words for a homepage name link. While no single, concrete link name emerged from testing, participants provided valuable feedback on what link name accurately captured the financial privacy notice content. They gravitated toward the term "personal information" because it was eye catching; "practices" because it indicated some action on the part of the financial company; and "sharing" because it indicated a specific practice of the financial company that has important implications for a customer's personal information.

"Personal information" is important, but here, "sharing" is the key. (VA-09)

"Sharing" is key because it's much more definitive in what they're trying to do. (VA-07)

Fact boxes

Functionally connecting the Fact boxes with the Table by means of a 'click' enabled participants to connect the two elements visually and cognitively. The initial Fact boxes design did not intuitively suggest to participants that they could 'click' the boxes to highlight sections of the Table.

I would not have known that I can relate the facts to the table until I moved my cursor over that area. (VA-07)

Inserting the click instruction next to the Fact boxes helped make the functionality clearer for participants. In addition to the 'click' instruction, Kleimann designed the "Facts" portion of these boxes to more closely match the conventions around the design of online buttons (e.g. many online buttons have a raised or 3-D appearance). The final design strikes a balance between an intuitive button design and a design compliant under Section 508 (accessibility of electronic information).

"Limit" link

Embedding the limiting information in the Table facilitated participants' access to this information. Participants appreciated the proximity and immediacy of the "limit" link in the Table, and many wanted to take immediate action to opt out. Because they were already online, most participants stated they preferred the online opt-out option and expected the link in the limiting options to lead them to an online opt-out form.

I'd go to the web, it's generally quick and painless. (VA-03)

Would do it online because I think it's quicker. (VA-06)

Online...it's probably a form, they attach it to my account number, I probably get an email. (VA-07)

Participants seemed to consider online opt-out functionality to be an important part of customer service.

Definitions

Visually accentuating the definition words caused disproportionate attention to this information online. In early designs, participants focused intently on the definition links in the first column of the Table, diverting some of their attention away from the sharing and limiting information in the rest of the Table. By decreasing the bolding of the links and underlining them only when participants hovered over them, Kleimann corrected the imbalance without decreasing the accessibility to the definitions.

Jump links

Jump links (i.e., internal navigation links that "jump" a user to another section on the page) at both the start and end of the notice give participants the option to access information without having to scroll through the entire notice. A jump link from the instructions to the FAQs provides easy access to this information from the beginning of the notice. A "return to top" jump link at the bottom of the page enables participants to return to the beginning without having to scroll all the way back up.

Expand/collapse

The expand/collapse functionality of the FAQs organized the supplementary information for users to read in their own style. Participants used the expand/collapse functionality according to their preference for looking through the information. Some expanded all questions at the beginning. Others expanded as they read along.

I'm going to expand all (FAQs) because I'm interested in them all (VA-10)

I like to have them expanded. I like to click, I don't want to read the question to see if I want to know the answer. (VA-07)

Task completion

The financial privacy notice facilitates two actions for the user: (1) comparing sharing practices and limiting options across companies, and (2) limiting sharing when applicable and desired. In moving the notice from paper to the web, Kleimann ensured participants could still effectively do both.

Comparison

Participants could easily compare sharing practices between banks. Participants said that the design, specifically that of the Table, made it easy for them to compare across banks. They could easily identify which company shared the most and which shared the least. With a large degree of accuracy, they could articulate where each bank fell on a “least” to “most” sharing scale, both in general and in relation to the other companies.

Limiting sharing

The limit information facilitated participants' understanding and ability to limit sharing. The notice should facilitate consumers' ability to opt out of sharing should they desire to do so. The “limit” link and the “How do I limit?” FAQ allowed most participants to easily identify which sharing they could limit and the ways to limit that sharing. Generally, participants' preferred choice of a bank's sharing practices aligned with their sharing preferences. Kleimann gauged participants' preferences by their responses to several targeted questions at the end of the interview. These questions about people's attitudes toward sharing were developed in the project's previous surveys.

Conclusion

The migration of the paper financial privacy notice prototype to a web-based version successfully retained high performance in comprehension, design integrity, navigation, and task completion. At the same time, the online medium facilitated an updated design that optimized the dynamic and functional possibilities of the web. Collapsing, combining, re-ordering, and enhancing the visual nature of content and the key elements allowed the notice to meet participants' needs when interacting with the information online. Ultimately, the web-based notice provides financial companies with a web-based version of their financial privacy notice that allows them to present their privacy practices to customers in a clear, conspicuous, and understandable form.

Appendix A: Participant Demographics

The table below lists the demographic distribution for the 11 participants across three rounds of cognitive usability testing. Rapid formative testing did not use a formal demographic distribution.

Cognitive Usability Demographics—11 Participants

Demographic	Number of participants
Gender	
Male	5
Female	6
Age	
21–35	3
36–45	3
46–55	2
56+	3
Income	
\$0–\$50K	5
\$50K +	6
Education	
High school, GED, or less	1
Some college	4
College degree	4
Graduate degree	2
Race	
White or Caucasian	6
Black or African American	3
Asian	1
Ethnicity	
Hispanic	1

Appendix B:

Screen Captures and Overview of Design Iterations

- Round 1 Screen Captures—Cognitive Usability
- Round 2 Screen Captures—Cognitive Usability
- Round 3 Screen Captures—Cognitive Usability
- Screen captures—Final web-based prototype
- Final web-based Notice—Design Considerations
- Overview of key design and functionality—Embedded information
- Overview of key design and functionality—Embedded information

Note: Screen captures are snapshots of the design iterations. They do not include functionality and design detail found in the functional online versions.

Formative Test Design Round 2— Screen captures

Birch Notice

What does Birch Bank do with your personal information?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Please look at this table carefully to understand our sharing practices. See below to understand how you can limit sharing and for additional information.

Reasons we can share your personal information	Does Birch Bank share?	Can you limit this sharing?
For our everyday business purposes.	Yes	No
For our marketing purposes.	Yes	No
For joint marketing with other financial companies.	Yes	No
For our affiliates' everyday business purposes.	Yes	No
For our affiliates' everyday business purposes.	Yes	Yes
For our affiliates to market to you.	Yes	Yes
For nonaffiliates to market to you.	Yes	Yes

To limit our sharing

1. Call 866-555-1111—our menu will prompt you through your choice(s)
2. Click www.bb.com
3. Mail

Please note: If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice. If you are *no longer* our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

What we do

Who we are

Other information

Definitions

How does Birch Bank protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law.

These measures include computer safeguards and secured files and buildings.

How does Birch Bank collect my personal information?

We collect your personal information, for example, when you

- open an account or deposit money
- pay your bills or apply for a loan
- use your credit or debit card

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

What happens when I limit sharing for an account I hold jointly with someone else?

Your choices will apply to everyone on your account—unless you tell us otherwise.

Formative Test Design Round 3— Screen captures

Aspen Notice

What does Aspen Bank do with your personal information?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Please take a look at this table to carefully understand our sharing practices. See below to understand how you can limit sharing and for additional information.

Reasons we can share your personal information	Does Aspen Bank share?	Can you limit this sharing?		
Everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No		
Marketing purposes to offer our products and services to you	Yes	No		
Joint marketing with other financial companies	Yes	No		
Affiliates' everyday business purposes information about your transactions and experiences	Yes	No		
Affiliates' everyday business purposes information about your credit worthiness	Yes	Yes	Click Call Mail	ab.com/limit 866-555-1111 print form
Affiliates to market to you	Yes	Yes	Click Call Mail	ab.com/limit 866-555-1111 print form
Nonaffiliates to market to you	Yes	Yes	Click Call Mail	ab.com/limit 866-555-1111 print form

Frequently Asked Questions

Who is providing this notice?
Aspen Bank, Willow Insurance, and Maple Mortgage

How do I limit sharing?
To limit sharing,

- Click www.ab.com/limitsharing,
- Call 866-555-1111, or
- Mail Print form and mail to:
Aspen Bank
125 Main St
Suite 1
Cityville, Maryland, 20000

Why can't I limit all sharing?
Federal law gives consumers the right to limit some but not all sharing. Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

What happens when I limit sharing for an account I hold jointly?
Your choices will apply to everyone on your account—unless you tell us otherwise.

When do you begin sharing my information if I'm a new customer?
If you a new customer, we can begin sharing your information 30 days from the date we sent you a notice.

Do you share my information when I am no longer a customer?
When you are no longer a customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

How does Aspen protect my personal information?
To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

How does Aspen Bank collect my personal information?
We collect your personal information, for example, when you

- open a an account or deposit money
- pay your bills or apply for a loan
- use your credit card

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

Birch Notice

Facts about Birch Bank's sharing practices

Reasons we can share your personal information	Does Birch Bank share?	Can you limit this sharing?
Everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
Marketing purposes to offer our products and services to you	Yes	No
Joint marketing with other financial companies	Yes	No
Affiliates' everyday business purposes information about your transactions and experiences	Yes	No
Affiliates' everyday business purposes information about your credit worthiness	Yes	Yes
Affiliates to market to you	Yes	Yes
Nonaffiliates to market to you	Yes	Yes

To limit our sharing

Click bb.com/limit
Call 866-555-1111
Mail print form

Helpful information about

this notice	limiting
Who is providing this notice? Birch Bank, Willow Insurance, and Maple Mortgage	Why can't I limit all sharing? Federal law gives consumers the right to limit some but not all sharing. Federal law gives you the right to limit only <ul style="list-style-type: none"> sharing for affiliates' everyday business purposes— information about your creditworthiness affiliates from using your information to market to you sharing for affiliates to market to you State laws and individual companies may give you additional rights to limit sharing.
Why are we providing this notice? Financial companies choose how they share your personal information. Federal law requires us to tell you how we collect, share, and protect your personal information.	
sharing	protecting/collecting
What happens when I limit sharing for an account I hold jointly? Your choices will apply to everyone on your account—unless you tell us otherwise.	How does Birch protect my personal information? To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings
When do you begin sharing my information if I'm a new customer? If you a new customer, we can begin sharing your information 30 days from the date we sent you a notice.	How does Birch Bank collect my personal information? We collect your personal information, for example, when you <ul style="list-style-type: none"> open a an account or deposit money pay your bills or apply for a loan use your credit card We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
Do you share my information when I am no longer a customer? When you are no longer a customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.	

Definitions

Affiliates
Companies related by common ownership or control. They can be financial companies and nonfinancial companies.

- Our affiliates include companies with a Birch name; financial companies, such as Willow Insurance and Maple Mortgage; and nonfinancial companies, such as Pine Marketing Agency.

Joint marketing
A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- Our joint marketing partners include credit card companies.

Nonaffiliates
Companies not related by common ownership or control. They can be financial and nonfinancial companies.

Cognitive Usability Test Design Round 1—Elements Map

The following table lists key design and functionality elements in the order they appeared within the Aspen (less sharing) and Birch (more sharing) notices. Screen captures of the design are on the following page.

Cognitive Usability Round 1 Elements Map			
Element	Design/Functionality	Birch	Aspen
Title	Title text in bold	Yes	Yes
Lead-in	Text	Paragraph lead-in	Numbered list lead-in
“some” link in lead-in	Highlights first row of table	Yes	No
FAQs jump link	Jumps user to FAQs section	No	Yes
4 th column icon	Popup information—“4 th column” of table	Question mark	“More” button
Embedded definition links within first column of table	Popup with definition information	Yes	Yes
Expandable/collapsible FAQs	Expands and collapses, questions—globally or individually	Yes	No (static FAQs)
Return to top link	Jumps user to the top of the notice	Yes	Yes

Cognitive Usability Test Design Round 1— Screen captures

Aspen Notice

Facts: What does Aspen Bank do with your personal information?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. In the table, we list

1. the reasons financial companies can share their customers' personal information,
2. the reasons Aspen Bank chooses to share, and
3. whether you can limit this sharing.

Look below the table for [frequently asked questions](#).

Reasons we can share your personal information	Does Aspen Bank share?	Can you limit this sharing?
For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, and report to credit bureaus	Yes	No more...
For our marketing purposes to offer our products and services to you	Yes	No more...
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes information about your transactions and experiences	No	We don't share
For our affiliates' everyday business purposes information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

Frequently Asked Questions

Why can't I limit all sharing?

- Federal law gives you the right to limit only
- sharing for affiliates' everyday business purposes—information about your creditworthiness
 - affiliates from using your information to market to you
 - sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

When does Aspen Bank share my personal information?

When you are no longer a customer, we continue to share your information as described in this notice.

How does Aspen Bank protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

How does Aspen Bank collect my personal information?

- We collect your personal information, for example, when you
- open an account or deposit money,
 - pay your bills or apply for a loan, or
 - use your credit card.

Questions? Call 866-555-1111 or go to www.ab.com/questions

[return to top](#)

Birch Notice

Facts: What does Birch Bank do with your personal information?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit [some](#) but not all sharing. In the table, we list the reasons financial companies can share their customers' personal information; the reasons Birch Bank chooses to share; and whether you can limit this sharing. Look below the table for more information about our practices.

Reasons we can share your personal information	Does Birch Bank share?	Can you limit this sharing?
For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, and report to credit bureaus	Yes	No ?
For our marketing purposes to offer our products and services to you	Yes	No ?
For joint marketing with other financial companies	Yes	No ?
For our affiliates' everyday business purposes information about your transactions and experiences	Yes	No ?
For our affiliates' everyday business purposes information about your creditworthiness	Yes	Yes ?
For our affiliates to market to you	Yes	Yes ?
For nonaffiliates to market to you	Yes	Yes ?

More information about our practices

[Expand all](#) | [Collapse all](#)

[+] [Who is providing this notice?](#)

[+] [How do I limit sharing?](#)

[+] [Why can't I limit all sharing?](#)

[+] [What happens when I limit sharing for an account I hold jointly with someone else?](#)

[+] [When does Birch Bank share my personal information?](#)

[+] [How does Birch Bank protect my personal information?](#)

[+] [How does Birch Bank collect my personal information?](#)

Questions? Call 866-555-1111 or go to www.bb.com/questions

[return to top](#)

Cognitive Usability Test Design Round 2—Elements Map

The following table lists key design and functionality elements in the order they appeared within the Aspen (less sharing) and Birch (more sharing) notices. Screen captures of the design are on the following page

Cognitive Usability Round 2 Elements Map			
Element	Design/Functionality	Birch	Aspen
Title	Title text in bold	Yes	Yes
Instruction box	Numbered list	Yes	Yes
FAQs jump link	Jumps user to FAQs section	Yes	Yes
Fact Boxes	Highlights corresponding section of the table	Yes	Yes
<i>Personal information</i> link	Embedded in table header row	Yes	Yes
Definition links	Embedded within first column of table	Yes	Yes
"Limit" link	When clicked, popup displays limiting options: Click, Call, Mail	Yes	No
Expandable/collapsible FAQs	Expands and collapses, questions—globally or individually	Yes	Yes
Return to top link	Jumps user to the top of the notice	Yes	Yes

Cognitive Usability Test Design Round 2— Screen captures

Aspen Notice

Rev. September 2009

What does Aspen Bank do with your personal information?

- Read the table below to understand Aspen Bank's sharing practices, and whether you can limit sharing.
- Click on each fact to learn more about how financial companies share and whether they offer the option to limit sharing. Each fact highlights a section of the table.
- See [frequently asked questions](#) for additional information.

Fact 1

Financial companies can share customers' personal information for particular reasons.

Fact 2

All financial companies need to share to run their everyday business.

Fact 3

Financial companies choose the reasons that they share customers' personal information.

Fact 4

If your financial company shares, you may have the option to limit.

Reasons we can share your personal information	Does Aspen Bank share?	Can you limit this sharing?
For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or to report to credit bureaus	Yes	No
For our marketing purposes to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes information about your transactions and experiences	No	We don't share
For our affiliates' everyday business purposes information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

Frequently Asked Questions
[Expand all](#) | [Collapse all](#)

[-] Why can't I limit all sharing?
If your financial company shares, federal law requires that they give you the right to limit

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

 State laws and individual companies may give you additional rights to limit sharing.

[-] When does Aspen Bank begin sharing my information if I am a new customer?
If you are a new customer, we can begin sharing your information 30 days from the date we sent you a notice. However, you can contact us at any time to limit our sharing.

[-] Does Aspen Bank share my information when I am no longer a customer?
When you are no longer a customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

[-] How does Aspen Bank protect my personal information?
To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

[-] How does Aspen Bank collect my personal information?
We collect your personal information, for example, when you

- open an account or deposit money,
- pay your bills or apply for a loan, or
- use your credit card.

Questions? Call 866-555-1122 or go to www.ab.com/questions

[return to top](#)

Birch Notice

Rev. September 2009

What does Birch Bank do with your personal information?

- Read the table below to understand Birch Bank's sharing practices, and whether you can limit sharing.
- Click on each fact to learn more about how financial companies share and whether they offer the option to limit sharing. Each fact highlights a section of the table.
- See [frequently asked questions](#) for additional information.

Fact 1

Financial companies can share customers' personal information for particular reasons.

Fact 2

All financial companies need to share to run their everyday business.

Fact 3

Financial companies choose the reasons that they share customers' personal information.

Fact 4

If your financial company shares, you may have the option to limit.

Reasons we can share your personal information	Does Birch Bank share?	Can you limit this sharing?
For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or to report to credit bureaus	Yes	No
For our marketing purposes to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes information about your creditworthiness	Yes	Yes To limit
For our affiliates to market to you	Yes	Yes To limit
For nonaffiliates to market to you	Yes	Yes To limit

Frequently Asked Questions
[Expand all](#) | [Collapse all](#)

[-] Who is providing this notice?
Birch Bank, Willow Insurance, and Maple Mortgage

[-] How do I limit sharing?
To limit sharing

- Click www.bb.com/limitsharing,
- Call 866-555-1111 (toll-free), or
- Mail [print form](#) and mail to:
Birch Bank
125 Main St
Suite 1
Cityville, MD 20000

[-] Why can't I limit all sharing?
If your financial company shares, federal law requires that they give you the right to limit

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

 State laws and individual companies may give you additional rights to limit sharing.

[-] What happens when I limit sharing for an account I hold jointly with someone else?
Your choices will apply to everyone on your account—unless you tell us otherwise.

[-] When does Birch Bank begin sharing my information if I am a new customer?
If you are a new customer, we can begin sharing your information 30 days from the date we sent you a notice. However, you can contact us at any time to limit our sharing.

[-] Does Birch Bank share my information when I am no longer a customer?
When you are no longer a customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

[-] How does Birch Bank protect my personal information?

Cognitive Usability Test Design Round 3—Elements Map

The following table lists key design and functionality elements in the order they appeared within the Aspen (less sharing) and Birch (more sharing) notices. Screen captures of the design are on the following page.

Cognitive Usability Round 3 Elements Map			
Element	Design/Functionality	Birch	Aspen
Background color	Entire page	Gray	White
Title	Title text in bold	Yes	Yes
Instruction box	Text	Sentence	Numbered list
FAQs jump link	Jumps user to FAQs	Yes	Yes
Fact Boxes	Highlights corresponding section of the table	Yes	Yes
Instructions for Fact Boxes	Text to the left of Fact Boxes	Yes	No
<i>Personal information</i> link	Embedded in table header row	Yes	Yes
Definition links	Embedded within first column of table	Yes	Yes
"Limit" link	When clicked, popup displays limiting options: Click, Call, Mail	Yes	No
Expandable/collapsible FAQs	Expands and collapses, questions—globally or individually	Yes	Yes
Return to top link	Jumps the top of the page	Yes	Yes

Cognitive Usability Test Design Round 3— Screen captures

Aspen Notice

What does Aspen Bank do with your personal information? Rev. October 2009

Three steps to find out

1. Click on each fact to highlight why financial companies share your personal information and if they offer the option to limit sharing.
2. Use the table to understand Aspen Bank's sharing and limiting practices.
3. Read the frequently asked questions for additional information.

Fact 1

Financial companies can share customers' personal information for particular reasons.

Fact 2

All financial companies need to share to run their everyday business.

Fact 3

Financial companies choose the reasons that they share customers' personal information.

Fact 4

If your financial company shares, you may have the option to limit sharing.

Reasons we can share your personal information	Does Aspen Bank share?	Can you limit this sharing?
For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, and report to credit bureaus	Yes	No
For our marketing purposes to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes information about your transactions and experiences	No	We don't share
For our affiliates' everyday business purposes information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

Frequently Asked Questions
Expand all | Collapse all

- [] **When does Aspen Bank begin sharing my information if I am a new customer?**
If you are a new customer, we can begin sharing your information 30 days from the date we sent you a notice.
- [] **Does Aspen Bank share my information when I am no longer a customer?**
When you are no longer a customer, we continue to share your information as described in this notice.
- [] **How does Aspen Bank protect my personal information?**
To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
- [] **How does Aspen Bank collect my personal information?**
We collect your personal information, for example, when you
 - open an account or deposit money,
 - pay your bills or apply for a loan, or
 - use your credit card.
- [] **Why can't I limit all sharing?**
If your bank shares, federal law gives you the right to limit
 - sharing for affiliates' everyday business purposes—information about your creditworthiness
 - affiliates from using your information to market to you
 - sharing for nonaffiliates to market to you
 State laws and individual companies may give you additional rights to limit sharing.

Questions? Call 866-555-1122 or go to www.ab.com/questions

return to top

The information above is required by federal law.

Birch Notice

What does Birch Bank do with your personal information? Rev. October 2009

Learn why financial companies share your personal information, whether Birch Bank shares your personal information, and if they offer the option to limit sharing.

Click on each fact → to highlight a section of the table.

Fact 1

Financial companies can share customers' personal information for particular reasons.

Fact 2

All financial companies need to share to run their everyday business.

Fact 3

Financial companies choose the reasons that they share customers' personal information.

Fact 4

If your financial company shares, you may have the option to limit sharing.

Reasons we can share your personal information	Does Birch Bank share?	Can you limit this sharing?
For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, and report to credit bureaus	Yes	No
For our marketing purposes to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes information about your creditworthiness	Yes	Yes Limit
For our affiliates to market to you	Yes	Yes Limit
For nonaffiliates to market to you	Yes	Yes Limit

Frequently Asked Questions
Expand all | Collapse all

- [] **Who is providing this notice?**
Birch Bank, Willow Insurance, and Maple Mortgage
- [] **How do I limit sharing?**
To limit sharing
 - Click www.bb.com/limitsharing
 - Call 866-555-1111 (toll-free)
 - Mail print form and mail to:
Birch Bank
125 Main St
Suite 1
Clyde, MD 20000
- [] **Why can't I limit all sharing?**
If your bank shares, federal law gives you the right to limit
 - sharing for affiliates' everyday business purposes—information about your creditworthiness
 - affiliates from using your information to market to you
 - sharing for nonaffiliates to market to you
 State laws and individual companies may give you additional rights to limit sharing.
- [] **What happens when I limit sharing for an account I hold jointly with someone else?**
Your choices will apply to everyone on your account—unless you tell us otherwise.
- [] **When does Birch Bank begin sharing my information if I am a new customer?**
If you are a new customer, we can begin sharing your information 30 days from the date we sent you a notice. However, you can still contact us at any time to limit this sharing.
- [] **Does Birch Bank share my information when I am no longer a customer?**
When you are no longer a customer, we continue to share your information as described in this notice. However, you can still contact us at any time to limit this sharing.
- [] **How does Birch Bank protect my personal information?**
To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
- [] **How does Birch Bank collect my personal information?**
We collect your personal information, for example, when you
 - open an account or deposit money,
 - pay your bills or apply for a loan, or
 - use your credit card.
 We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

Questions? Call 866-555-1122 or go to www.bb.com/questions

return to top

The information above is required by federal law.

Final Web-based Notice Design—Elements Map

The following table lists key design and functionality elements in the order they appeared within the final web-based prototype design. Screen captures of the design are on the following page

Final Web-based Notice Design Elements Map			
Element	Design/Functionality	Opt-out	No opt-out
Background color	Entire page	White	White
Title	Title text in bold	Yes	Yes
Instruction box	Numbered list	Yes	Yes
FAQs jump link	Jumps user to FAQs	Yes	Yes
Fact Boxes	Highlights corresponding section of the table	Yes	Yes
Instructions for Fact Boxes	Text to the left of Fact Boxes	Yes	Yes
<i>Personal information</i> link	Embedded in table header row	Yes	Yes
Definition links	Embedded within first column of table	Yes	Yes
"Limit" link	When clicked, popup displays limiting options: Click, Call, Mail	Yes	No
Expandable/collapsible FAQs	Expands and collapses, questions—globally or individually	Yes	Yes
Return to top link	Jumps user to the top of the notice	Yes	Yes

Final Web-based Notice Design— Screen captures

Web notice with Opt-out

Rev. October 2009

What does [name of financial institution] do with your personal information?

Three steps to find out:

- Click on each fact to learn what financial companies do with your [personal information](#).
- Use the table to understand [name of financial institution]'s sharing practices and if it offers the option to limit sharing.
- Read the [frequently asked questions](#) for additional information.

Click on each fact → to highlight a section of the table.

Fact 1

Financial companies can share customers' personal information for particular reasons.

Fact 2

All financial companies share customers' personal information to run their everyday business.

Fact 3

Financial companies choose the reasons they share customers' personal information.

Fact 4

If your financial company shares your personal information, you may have the option to limit sharing.

Reasons we can share your personal information	Does [name of financial institution] share?	Can you limit this sharing?
For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus		
For our marketing purposes to offer our products and services to you		[If Yes] Limit
For joint marketing with other financial companies		[If Yes] Limit
For our affiliates' everyday business purposes information about your transactions and experiences		[If Yes] Limit
For our affiliates' everyday business purposes information about your creditworthiness		[If Yes] Limit
For our affiliates to market to you		[If Yes] Limit
For nonaffiliates to market to you		[If Yes] Limit

Frequently Asked Questions
[Expand all](#) | [Collapse all](#)

- [-] Who is providing this notice?
- [-] Why is [name of financial institution] providing this notice?
- [-] What types of personal information does [name of financial institution] collect and share?
- [-] How do I limit sharing?
- [-] When does [name of financial institution] begin sharing my personal information if I am a new customer?
- [-] Why can't I limit all sharing?
- [-] What happens when I limit sharing for an account I hold jointly with someone else?
- [-] What does [name of institution] do with my personal information when I am no longer a customer?
- [-] How does [name of financial institution] protect my personal information?
- [-] How does [name of financial institution] collect my personal information?

[return to top](#)

Questions? Call [phone number] or go to [website]

Web notice with NO Opt-out

Rev. October 2009

What does [name of financial institution] do with your personal information?

Three steps to find out:

- Click on each fact to learn what financial companies do with your [personal information](#).
- Use the table to understand [name of financial institution]'s sharing practices and if it offers the option to limit sharing.
- Read the [frequently asked questions](#) for additional information.

Click on each fact → to highlight a section of the table.

Fact 1

Financial companies can share customers' personal information for particular reasons.

Fact 2

All financial companies share customers' personal information to run their everyday business.

Fact 3

Financial companies choose the reasons they share customers' personal information.

Fact 4

If your financial company shares your personal information, you may have the option to limit sharing.

Reasons we can share your personal information	Does [name of financial institution] share?	Can you limit this sharing?
For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus		
For our marketing purposes to offer our products and services to you		
For joint marketing with other financial companies		
For our affiliates' everyday business purposes information about your transactions and experiences		
For our affiliates' everyday business purposes information about your creditworthiness		
For our affiliates to market to you		
For nonaffiliates to market to you		

Frequently Asked Questions
[Expand all](#) | [Collapse all](#)

- [-] Who is providing this notice?
- [-] Why is [name of financial institution] providing this notice?
- [-] What types of personal information does [name of financial institution] collect and share?
- [-] Why can't I limit all sharing?
- [-] What does [name of institution] do with my personal information when I am no longer a customer?
- [-] How does [name of financial institution] protect my personal information?
- [-] How does [name of financial institution] collect my personal information?

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Questions? Call [phone number] or go to [website]

Overview of key design and functionality elements—Embedded Information

What does [name of financial institution] do with your personal information? Rev. October 2009

Three steps to find out:

1. Click on each fact to learn what financial companies do with your [personal information](#).
2. Use the table to understand [name of financial institution]'s sharing practices and if it offers the option to limit sharing.
3. Read the [frequently asked questions](#) for additional information.

Click on each fact to highlight a section of the table.

Fact 1

Financial companies can share customers' personal information for particular reasons.

Fact 2

All financial companies share customers' personal information to run their everyday business.

Fact 3

Financial companies choose the reasons they share customers' personal information.

Fact 4

If your financial company shares your personal information, you may have the option to limit sharing.

Reasons we can share your personal information	Does [name of financial institution] share?	Can you limit this sharing?
For our everyday business purposes <small>such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus</small>		
For our marketing purposes <small>to offer our products and services to you</small>		[If Yes] Limit >
For joint marketing with other financial companies		[If Yes] Limit >
For our affiliates' everyday business purposes <small>information about your transactions and experiences</small>		[If Yes] Limit >
For our affiliates' everyday business purposes <small>information about your creditworthiness</small>		[If Yes] Limit >
For our affiliates to market to you		[If Yes] Limit >
For nonaffiliates to market to you		[If Yes] Limit >

Frequently Asked Questions
Expand all | Collapse all

- | Who is providing this notice?
- | Why is [name of financial institution] providing this notice?
- | What types of personal information does [name of financial institution] collect and share?
- | How do I limit sharing?
- | When does [name of financial institution] begin sharing my personal information if I am a new customer?
- | Why can't I limit all sharing?
- | What happens when I limit sharing for an account I hold jointly with someone else?
- | What does [name of institution] do with my personal information when I am no longer a customer?
- | How does [name of financial institution] protect my personal information?
- | How does [name of financial institution] collect my personal information?

[return to top](#)

Questions? [Call \[phone number\]](#) or go to [\[website\]](#)



Example of popup definition for personal information

Personal Information

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social security number and income
- Account balances and payment history
- Credit history and credit scores



Example of popup definition within Table

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- Birch Bank jointly markets with credit card companies.



Example of "limit" information

Yes

[Limit >](#)

To limit sharing
Click www.bb.com/limitsharing
Call 866-555-1111 (toll-free)
Mail [print form](#)

[+] What types of personal information does [name of financial institution] collect and share?



Example of collapsed/expanded FAQ

-| What types of personal information does [name of financial institution] collect and share?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and [income]
- [account balances] and [payment history]
- [credit history] and [credit scores]

Overview of key design and functionality elements—Fact Boxes

What does [name of financial institution] do with your personal information? Rev. October 2018

Three steps to find out:

1. Click on each fact to learn what financial companies do with your **personal information**.
2. Use the table to understand [name of financial institution]'s sharing practices and if it offers the option to limit sharing.
3. Read the **frequently asked questions** for additional information.

Click on each fact → to highlight a section of the table.

Fact 1

Financial companies can share customers' personal information for particular reasons.

Fact 2

All financial companies share customers' personal information to run their everyday business.

Fact 3

Financial companies choose the reasons they share customers' personal information.

Fact 4

If your financial company shares your personal information, you may have the option to limit sharing.

Reasons we can share your personal information	Does [name of financial institution] share?	Can you limit this sharing?
For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus		
For our marketing purposes to offer our products and services to you		
For joint marketing with other financial companies		
For our affiliates' everyday business purposes information about your transactions and experiences		
For our affiliates' everyday business purposes information about your creditworthiness		
For our affiliates to market to you		
For nonaffiliates to market to you		

Frequently Asked Questions

[Expand all | Collapse all](#)

- [-] Who is providing this notice?
- [-] Why is [name of financial institution] providing this notice?
- [-] What types of personal information does [name of financial institution] collect and share?
- [-] Why can't I limit all sharing?
- [-] What does [name of institution] do with my personal information when I am no longer a customer?
- [-] How does [name of financial institution] protect my personal information?
- [-] How does [name of financial institution] collect my personal information?

[return to top](#)

Questions?
Call [phone number] or go to [website]

Fact Boxes

When clicked, each Fact highlights a corresponding section of the Table.

Fact 1

Fact 1

Financial companies can share customers' personal information for particular reasons.

Fact 2

All financial companies share customers' personal information to run their everyday business.

Fact 3

Financial companies choose the reasons they share customers' personal information.

Fact 4

If your financial company shares your personal information, you may have the option to limit sharing.

Reasons we can share your personal information	Does [name of financial institution] share?	Can you limit this sharing?
For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus		
For our marketing purposes to offer our products and services to you		
For joint marketing with other financial companies		
For our affiliates' everyday business purposes information about your transactions and experiences		
For our affiliates' everyday business purposes information about your creditworthiness		
For our affiliates to market to you		
For nonaffiliates to market to you		

Fact 2

Fact 1

Financial companies can share customers' personal information for particular reasons.

Fact 2

All financial companies share customers' personal information to run their everyday business.

Fact 3

Financial companies choose the reasons they share customers' personal information.

Fact 4

If your financial company shares your personal information, you may have the option to limit sharing.

Reasons we can share your personal information	Does [name of financial institution] share?	Can you limit this sharing?
For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus		
For our marketing purposes to offer our products and services to you		
For joint marketing with other financial companies		
For our affiliates' everyday business purposes information about your transactions and experiences		
For our affiliates' everyday business purposes information about your creditworthiness		
For our affiliates to market to you		
For nonaffiliates to market to you		

Fact 3

Fact 1

Financial companies can share customers' personal information for particular reasons.

Fact 2

All financial companies share customers' personal information to run their everyday business.

Fact 3

Financial companies choose the reasons they share customers' personal information.

Fact 4

If your financial company shares your personal information, you may have the option to limit sharing.

Reasons we can share your personal information	Does [name of financial institution] share?	Can you limit this sharing?
For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus		
For our marketing purposes to offer our products and services to you		
For joint marketing with other financial companies		
For our affiliates' everyday business purposes information about your transactions and experiences		
For our affiliates' everyday business purposes information about your creditworthiness		
For our affiliates to market to you		
For nonaffiliates to market to you		

Fact 4

Fact 1

Financial companies can share customers' personal information for particular reasons.

Fact 2

All financial companies share customers' personal information to run their everyday business.

Fact 3

Financial companies choose the reasons they share customers' personal information.

Fact 4

If your financial company shares your personal information, you may have the option to limit sharing.

Reasons we can share your personal information	Does [name of financial institution] share?	Can you limit this sharing?
For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus		
For our marketing purposes to offer our products and services to you		
For joint marketing with other financial companies		
For our affiliates' everyday business purposes information about your transactions and experiences		
For our affiliates' everyday business purposes information about your creditworthiness		
For our affiliates to market to you		
For nonaffiliates to market to you		

Appendix C: Overview of Findings from Formative and Cognitive Usability Testing

- Round 1 findings—Formative testing
- Round 2 findings—Formative testing
- Round 3 findings—Formative testing
- Round 1 findings—Cognitive Usability testing
- Round 2 findings—Cognitive Usability testing
- Round 3 findings—Cognitive Usability testing

Formative Testing— Round 1 Overview

A summary of findings from Round 1 formative testing appears below.

Comprehension

Overall

- When reading a fairly simple mock-up of the notice on a computer screen, basic comprehension levels remained intact.
- Users perceived the information within the Formative Round 1 notice as “wordy” when viewing online.
- When users were able to see the “whole” of information in an advance organizer or menu, they made quick judgments about what information they deemed most important.

Table

- The Table was an effective tool for informing users about sharing.

Definitions

- Users understood that blue equaled links.

Design Integrity

Overall

- Visuals and graphics dominated in the online environment. Highly visual navigation established a clear hierarchy and moved the focus away from the words.
- Users expected graphics to inform as much as possible.
- Users attributed importance to the visually presented information.
- Redundant information stood out to participants as we translated from a static paper-based format to the more dynamic online format.
- The flow of the paper-based information in an online environment seemed redundant to users.
- Vertical layout encouraged skimming.
- The layering and linking within the document affected the overall perception of hierarchy. When some information was “spelled out” and some was hidden, users attributed a difference in importance.
- Users had certain expectations about why information was linked. Links within a document should be “meaningful”, avoid redundancy, and add to the overall navigation.

Table

- In a “layered” online environment, the table functioned as an informational center piece with context branching out from it.
- Placement of the Table too low down may affect perceived hierarchy or importance of the information within the Table.

Formative Testing— Round 2 Overview

A summary of findings from Round 2 formative testing appears below.

Comprehension

Overall

- Overall, participant comprehension about collecting, sharing, and protecting personal information continued to be high.

Lead-in content

- Participants skimmed through the lead-in context information to see if anything “jumped out at them”, and then largely ignored it as they moved their focus to the Table.
- Participants considered the lead-in context information as less important information than the Table.

Table

- Participants noticed the Table immediately, and saw it as the visual focal point.
- Participants used the Table as their primary source of information and as a way to navigate the rest of the information.
- Redistributing contextual information throughout the notice (as embedded links, rollovers, and within “additional information”) rather than having it precede the Table as it does in the paper-based notice, helped make the Table more “up front”—which grabbed participants’ attention quickly.
- Collapsing information in the first column of the Table caused participants to think the rows were repetitive and the same.
- Participants understood the concept of embedded information (rollovers) and effectively accessed this information when interacting with and interpreting the overall notice.
- The embedded information (rollovers) caused some participants to misunderstand the hierarchy of that information.
- Relocating the “Why can’t I limit all sharing” FAQ to embedded popup boxes in the last three rows of the Table created *awareness* of the federally mandated distinctions in limiting. However, findings were unclear as to whether participants still fully *understood* these distinctions.

Limiting

- Participants were able to understand the “limit” link and said they expected to be able to click from the online form to an online opt-out.
- The placement and language in the “Please note” section distracted participants.

Additional Information / Frequently Asked Questions

- Placing “additional information” in a visual format drew participants’ attention to it, but the tab format for displaying that information didn’t work.
- Participants saw the “What we do” tab as the most important information in the “additional information” section which may have been due to the visual framing in this round’s mock-up,
- Participants thought the label “Other information” suggested the information under that tab may be less important.

Design Integrity

Overall

- Participants thought the language was easy to read, and they generally liked the conversational tone.

Navigation

Overall

- Participants navigated the notice easily.
- Participants used the Table as a way to navigate the rest of the information.

Homepage Link Name

- Participants had mixed opinions about whether they would click on “Privacy Policy” first or “What we do with your personal information” to link to a web-based privacy notice. Neither option tested as sufficient.
- Participants did not think “Privacy Policy” accurately labeled the notice.

Formative Testing— Round 3 Overview

A summary of findings from Round 3 formative testing appears below.

Comprehension

Overall

- Overall comprehension remained high.
- All participants understood that the main point of the information was to inform consumers about the bank’s sharing practices.
- All participants understood the primary information of the Table, e.g., the reasons for sharing, whether the bank shared, and if they could limit that sharing.

Lead-in content

- Comprehension dropped without the lead-in blurb to contextualize the Table.
- With some contextual information above the Table, overall comprehension remained strong.
- The contextual distinctions—that (1) banks choose how they share and (2) federal law requires some limiting options—located above the Table, helped participants understand columns two and three of the Table.

Table

- Participants perceived the Table as the primary information of the notice and wanted to opt out directly from the Table.
- “Affiliates” three times in a row and “affiliates everyday business purposes” twice in a row distracted some participants.
- Removing the words “For our” from the “Reasons” column weakened the connection between the column header (Reasons we can share your personal information) and the subsequent information.
- Participants didn’t always understand the distinction that federal law provided the right to opt out only for the three particular reasons.

Limiting

- Embedding “to limit sharing” information in the Table was more intuitive for participants than placing this information under the Table.
- Embedding “to limit sharing” information met participants’ need to take action immediately when they saw a “Yes” in the “Can you limit sharing?” column.
- Participants continued to prefer the click/web link as the opt-out option because they were already in the online environment.
- Conversely, participants felt that a mail-in option to limit sharing was an antiquated idea and were bothered that a mail-in the option was within an online environment.

- Participants preferred all three opt-out methods embedded right next to the Table, specifically, right next to the “Yes’s”.
- Participants appreciated having the “to limit information” both immediately embedded in the Table and listed in the FAQs.

Additional Information / Frequently Asked Questions

- Participants perceived the information below the Table as auxiliary and generally referred to it when they wanted additional information the Table didn’t provide.
- Participants typically only focused on the questions below the Table to scan the information.
- Most participants said they would quickly scan the questions to see which ones, if any, addressed their specific information search.
- Participants did not need the additional information “chunked” in order to use it effectively.
- Participants found the chunked version unfamiliar and distracting.
- Participants found “Frequently Asked Questions” to be a familiar, descriptive, and understandable title for this section of information.
- Some participants wanted a quick preview of the information they would find below the Table.
- Participants didn’t always think the answers to the questions in the additional information were helpful or always satisfactorily answered the question.

Definitions

- When given links to definitions, participants used them.
- One participant who saw a notice without links asked for a link to the definitions.
- Participants used some scrolling to access definitions, even if we provided links, because the definitions were lower on the page.
- Personal information worked as a definition.

Design Integrity

Overall

- Participants thought the information was succinct and easy to read and understand.
- Layout changes, such as (1) moving personal information to definitions and (2) embedding the limiting information, did not adversely affect comprehension.
- Some participants interpreted the notice’s brevity as a summary (of the more detailed information they are used to seeing about privacy) or wondered whether more detailed information was missing.

Navigation

Overall

- Users navigated information on the screen in different ways. Some clicked on all clickable links; others scrolled first to get the lay of the land; some read from top to bottom and ignored links.

- Participants used the jump links when provided, but they also scrolled, indicating that the notice design should accommodate multiple types of use.

Homepage Link Name

- Participants did not like ‘privacy policy’ as the link name to this notice. They understood a privacy policy to be a long and dense list of legal information.

Task Completion

Comparison

- When comparing, participants were able to identify the bank that shared the least.

Limiting

- Participants were able to understand the “limit” link and expected it to lead them to an online opt-out option.

Cognitive Usability Testing— Round 1 Overview

A summary of findings from Round 1 cognitive usability testing appears below.

Comprehension

Overall

- Overall comprehension remained high.
- All participants understood that the main point of the information was to inform consumers about the bank’s sharing practices.
- All participants understood the primary information of the Table, e.g., the reasons for sharing, whether the bank shared, and if they could limit that sharing.

Lead-in Content

- Some participants didn’t fully understand that companies choose the reasons they share customers’ personal information.
- In the Birch notice, the “some” hyperlink helped some participants connect the federal law to the bottom three rows in the Table.
- Participants who saw the Aspen notice first were confused by the mention of limiting in the lead-in context (and within the FAQs) because Aspen didn’t offer anything to limit.

Table

- Most participants did not fully understand the voluntary opt-out distinction, e.g., that banks choose to share information or not, and can choose to offer the option to limit sharing beyond what federal law requires.
- The participants who saw the Aspen notice first didn’t fully understand that federal law gives consumers the right to limit some sharing in only certain categories of sharing, and only if the bank shared.
- Most participants understood that “we don’t share” in the Aspen Table meant there was no option to limit—because there was no sharing.

Fourth Column

- Most participants used and understood the “everyday business purposes” popup box.
- Most participants found the language in rows two, three, and four of the fourth column unhelpful and without purpose.
- One participant thought the information in rows two, three, and four of the “fourth column” actually raised questions rather than clarified. He said the column did not provide additional supporting information implied by the question mark icon.

Limiting

- All participants understood how to limit.
- Most participants preferred the online limit option.
- One participant preferred the toll-free number option in order to talk to a live person.

Additional Information / Frequently Asked Questions

- Most of the participants saw the additional information questions as supplementary (to the Table) and said they would use it only if they had questions.
- The answer to “Why can’t I limit all sharing?” caused confusion for most of the participants of both notices. Specifically, participants had trouble mapping the three federal law requirements listed in the FAQs back to the same reasons in the Table.
- In the answer to “Why can’t I limit all sharing?”, one participant misinterpreted the word “only” to mean he couldn’t limit the top four sharing reasons because of federal law, rather than because the bank didn’t allow it.
- Participants had difficulty with the question, “When does X Bank share my personal information?”, because it did not explicitly preview the answer.
- One participant misinterpreted the former customer FAQ as meaning that banks begin sharing indefinitely after you are no longer a customer.

Definitions

- Most participants did not easily see the personal information link on their initial read.
- When they saw and used the definition links to include personal information, participants understood the embedded information and found it useful.
- The blue underlined links brought increased attention to the left side of the Table and to the words joint marketing, affiliates, and nonaffiliates. This increased attention led a couple of participants to try to incorrectly use information in the definitions to interpret a bank’s sharing and limiting practices.

Design Integrity

Overall

- Most participants reacted positively to the overall design, layout, and language of the notice.
- Most participants viewed the Table as the primary information of the notice.
- Most participants saw the information below the Table as supplementary.
- All participants thought the layout was clear and well organized.
- Most participants preferred the Birch layout to the Aspen layout in terms of spacing and functionality.
- Most participants liked the use of color in the design and layout.
- Most participants thought the language was easy to read and understand.

Navigation

Overall

- All participants were able to navigate the notice successfully.

Homepage Link Name

- Some participants preferred the link name “Your personal information” because the term “personal information” caught their eye and made them want to click on it.
- Some participants preferred the link name “Our sharing practices” because it was more specific and set a better expectation of what they would find when they clicked on the link.

Lead-in content

- Most participants skimmed or skipped the lead-in content the first time through both notices.
- Several participants reacted positively to the functionality of the “some” link. When clicked, the word “some” highlighted the bottom three rows of the Table in green, indicating where federal law requires limiting.

Table

- All participants liked the design of the Table and thought it was easy to read.
- Some participants noted the convenience of being able to limit sharing directly from popup boxes in the fourth column.
- Some participants preferred the question mark icon and some participants preferred the “more...” button for activating the fourth column popup boxes.

Definitions

- Most participants clicked on the underlined links for joint marketing, affiliates, and nonaffiliates.
- Some participants appreciated that the definition links popped up information on the same page rather than taking them elsewhere.

Additional Information / Frequently Asked Questions

- All participants were able to use and understand the expandable/collapsible functionality in the Birch notice.
- Some participants preferred the “Frequently Asked Questions” title, and some preferred the title, “More information about our practices”.
- A few participants mentioned the title “Frequently Asked Questions” did not accurately represent the amount or type of information in this section.

Questions box

- Most participants noticed the “Questions” box at the bottom of the page.
- A couple of participants anticipated that the link in the questions box would lead to further FAQs.
- Some participants thought the link in the questions box would go to the bank’s “contact us” page.

Font size

- A couple of participants thought the font size in the Table and the fourth column popup boxes was too small.

Task Completion

Comparison

- When comparing notices, all participants were able to identify the most (Birch) and least (Aspen) sharing bank.
- Most participants understood that Aspen, the lesser sharing bank, still shared but shared for fewer reasons.
- After comparing, all participants understood where each bank fell on the “less versus more” sharing scale and adjusted their original scale answers to reflect their new understanding.
- When comparing, participants were able to identify the bank that shared the least.

Limiting

- Participants understood that they could limit sharing for some reasons but not all.

Attitudes

Overall

- Some participants said they don’t normally read privacy information and would probably not thoroughly read this information, but all participants reported they thought the information was important to know.
- One participant said she would expect to find even more detailed information elsewhere—in addition to what was in the notice.
- A couple of participants wondered how bank mergers would affect the policies discussed in the notice.
- A couple of participants worried about and questioned whether banks were sharing personal information with employers.
- Most participants thought that banks generally all share in similar ways.
- Most participants expressed that they did not want their bank sharing their information with affiliates and nonaffiliates, even if it resulted in targeted services; one said that she would not mind.

Cognitive Usability Testing— Round 2 Overview

A summary of findings from Round 2 cognitive usability testing appears below.

Comprehension

Overall

- Overall comprehension remained high.
- All participants understood that the main point of the information was to inform consumers about the banks' sharing practices.
- Participants accurately compared sharing practices across banks.
- All participants understood that the purpose of the notice was to inform them of the banks' sharing practices.

Instructions

- Most participants did not read the instructions during their first look through the information.
- When participants did read them, the instructions helped explain the functionality of the Fact boxes.

Fact Boxes

- All participants thought the Fact boxes provided important information.
- The wording in the Fact boxes confused some participants.

Table

- All participants understood the primary information of the Table, e.g., that banks shared for different reasons, whether the bank shared, and if they could limit that sharing.
- The repetition of the affiliate information (in the first column of the Table) distracted some participants.
- A few participants thought the phrase "We don't share" was unclear in the Aspen notice because it did not directly answer the question posed in the third column heading ("Can you limit this sharing?").
- All participants understood there was nothing to limit if Aspen did not share.

Limiting

- When a bank shared, all participants understood if they could limit sharing.
- Not all participants understood why they could limit some sharing but couldn't limit other sharing.

- Most participants did not understand that the limiting options (in the Birch notice) were offered because they were mandated by federal law.

Frequently Asked Questions (FAQs)

- Participants said they would only read the FAQs that seemed relevant to the specific questions they had.
- The statement, “However, you can limit sharing at any time.” confused all participants.
- All participants were unsatisfied with the vague wording in the limit FAQ.

Definitions

- The blue links in the first column of the Table brought attention to the words and definitions for joint marketing, affiliates, and nonaffiliates.
- Most participants did not notice the personal information link in the Table header on their initial read.
- When participants used the definition links, they understood the embedded information and found it useful.
- Participants used the definitions—particularly affiliates and nonaffiliates—as another way to understand the bank’s sharing and limiting practices.
- Participants could easily tell from the Aspen notice that the bank did not have affiliates.
- Participants understood the definitions in the Aspen notice more clearly than they understood the definitions in the Birch notice.

Design Integrity

Overall

- Participants reacted positively to the design, layout, and language of the notice.
- All participants thought the language and layout was straightforward and easy to understand.
- Participants perceived the scope of the language in the notice differently—some saw it as highly detailed, some thought it was a summary of more in-depth information.
- All participants saw the FAQs as supplementary to the Table and the Facts but still considered them a necessary notice component.

Navigation

Overall

- All participants looked at the Facts first, the Table second, and the instructions and FAQs last.
- All participants were able to navigate the notice successfully with and without using the functionality of the Fact boxes.

Homepage Link Name

- Participants showed a preference for the following words: bank, purpose, practices, sharing, personal, and information.
- Participants suggested the following link names:
 - personal information practices
 - banks sharing practices
 - purposes banks share personal information [sic]

Instructions

- All participants skimmed or skipped the instructions the first time through both notices.
- When they did not read the instructions, some participants did not understand they could click on the Fact boxes to highlight sections of the Table.
- None of the participants used the FAQ jump link.

Fact Boxes

- All participants gravitated to the Fact boxes first.
- Participants used the Fact box highlighting to navigate the Table.
- The design of the Fact boxes did not clearly communicate to participants that the boxes were clickable.
- Once participants clicked on the Fact boxes, they understood their purpose and functionality to highlight and explain sections of the Table.
- Participants understood that there was a relationship between the highlighted Fact and the highlighted section of the Table.
- The functionality helped all participants understand the information in the Fact boxes and in the Table.

“Limit” link

- A few participants did not notice the “limit” link in the third column of the Birch Table.
- Since a few participants did not notice the “limit” link in the third column of the Birch Table—or read the limit information in the FAQ’s—they did not initially understand how to limit.
- When participants did see the “limit” link, they clicked on the link.
- Participants expected the “Click” option in the “limit” popup to take them to an opt-out form.
- Some participants thought the font size in the “limit” popup was too small.

Frequently Asked Questions

- All participants only skimmed through the FAQs during their first read through.
- Each participant looked to the FAQs to find answers to questions not answered when navigating the instructions, Fact boxes, and the Table.
- All participants used the expandable/collapsible functionality of the FAQs.
- Some participants preferred to expand all FAQs at once, other participants preferred to expand questions individually as needed.

Questions box

- Some participants expected the link in the “Questions” box at the bottom of the page to lead them to a comment form.
- One participant expected the link to lead to a longer list of FAQs.

Task Completion

Comparison

- When comparing notices, all participants were able to identify the most (Birch) and least (Aspen) sharing bank.
- Most participants understood that Aspen shared but that it shared for fewer reasons.
- After comparing, all participants understood where each bank fell on the “less versus more” sharing scale.
- After comparing, all participants said they would choose the bank that shared the least.

Limiting

- All participants were able to understand the “limit” link when they were offered the option to opt out.

Attitudes

Overall

- Some participants said they don’t normally read privacy information.
- Some participants said they would be more likely to read privacy information after seeing this page.
- All participants came to the notice with concerns about the privacy and security of their personal information online.
- All participants demonstrated an awareness of online security cues—mentioning SSL encryption and the “lock” icon.
- In the closing survey question about sharing, all participants said they thought all banks generally share in similar ways.
- In the closing survey question about who banks can share with, all participants said they did not want their bank sharing their personal information with affiliates and nonaffiliates, even if it resulted in targeted services.

Cognitive Usability Testing— Round 3 Overview

A summary of finding from Round 3 cognitive usability testing appears below.

Comprehension

Overall

- Overall comprehension remained high.
- All participants understood that the main point of the information was to inform consumers about the banks' sharing practices.
- Participants accurately compared sharing practices across banks.
- Some participants considered the "limit" information to be the most important aspect of the notice.
- A few participants expressed a sense of trust in Aspen and Birch because they were providing the notice.

Instructions

- Most participants did not read the instructions at the top when they first interacted with the information.
- Some participants returned to read the instructions at the top after initially scanning all the information.

Fact Boxes

- All participants thought that the Fact boxes contained important information.
- The information in the Fact boxes helped most participants understand the Table regardless of whether they used the highlighting function.
- Some participants didn't connect the phrase "financial companies choose the reasons that they share customers' personal information" (in Fact 3) to the second column in the Table.
- Some participants did not initially understand the distinction between all financial companies versus your financial company in the Fact boxes.

Table

- All participants understood the primary information of the Table, e.g., that banks shared for different reasons, whether the bank shared, and if they could limit that sharing.
- Some participants were confused at times about whether the verb "sharing" referred to the bank sharing information with them (the consumer) or to the bank sharing their personal information with others.

- The phrase “We don’t share” (in the Aspen notice) was unclear to a couple of participants.
- When participants used the definition links, they understood the embedded information and found it useful.

Limiting

- All participants understood for which reasons they could limit sharing in the Birch notice.
- All participants understood that Aspen shared and that it shared for fewer reasons.
- All participants understood that they could not limit sharing with Aspen because there was no option to limit.
- Most participants did not understand why they could limit for some reasons and not for others.
- Most participants did not understand that federal law required banks to allow consumers to limit for some affiliate and non-affiliate sharing (“Why can’t I limit all sharing” FAQ).
- Most participants did not understand that federal law did not require banks to allow limiting for the bank’s marketing and joint marketing purposes.

Definitions

- Most participants did not notice the personal information link at the top of the notice.
- Some participants did not understand what types of information the bank was sharing before reading the personal information box.
- When participants used the definition links, they understood the embedded information and found it useful.
- The blue links in the first column of the Table did not bring extra attention to the words and definitions for joint marketing, affiliates, and nonaffiliates.
- Most participants could easily tell from the Aspen notice that Aspen did not have affiliates.

Frequently Asked Questions (FAQs)

- All participants thought the FAQs were an important and informative part of the notice.
- Some participants only skimmed the FAQs on their initial read-through, while others read them thoroughly.
- Some participants saw the FAQs as the primary source of information in the notice.

Design Integrity

Overall

- Participants reacted positively to the layout and language of the notice, but they had mixed reactions between the two different notice designs.
- All participants thought the language was straightforward and easy to understand.
- All participants thought the font size was readable.
- Some participants didn't see the blue links against the white background in the Aspen Bank notice.

Navigation

Overall

- Participants easily navigated through the notice.
- All participants navigated to the Fact boxes first.
- All participants were able to navigate the notice successfully with and without using the functionality of the Fact boxes.

Homepage Link Name

- Participants showed a preference for the following words: sharing, practice, facts.
- Participants suggested the following link names:
 - Bank's practices/facts
 - Sharing facts
 - Personal sharing practices
 - Information sharing practice

Instructions

- Participants more easily noticed the "click" instruction when it was next to the Fact boxes (Birch) rather than in the top instruction box (Aspen).
- None of the participants used the jump link at the top to drop down to the FAQs.

Facts

- The design of the Fact boxes did not clearly communicate to participants that they were clickable.
- When participants clicked on the Fact boxes, they understood their functionality and purpose.
- Every participant navigated to the Fact boxes when they first interacted with the notice.

"Limit" Link

- Most participants saw and clicked on the "limit" link (in Birch), regardless of whether they started with the Birch notice.

Frequently Asked Questions (FAQs)

- All participants understood the functionality of the FAQs.
- Participants used the functionality in the FAQs in different ways: some skimmed the collapsed questions; some expanded individual questions; some expanded all of the FAQs.

“Questions” Box

- Most participants said they would choose the online option in the “Questions” box to ask the bank questions.
- Participants expected the link in the “Questions” box to lead to a comment form, email form, or online chat box.

Task Completion

Comparison

- When comparing notices, all participants correctly identified the banks with the most (Birch) and least (Aspen) sharing.
- Comparing the Tables helped participants clarify where the bank fell on the “less versus more” sharing scale and adjust their original scale answers accordingly.
- After comparing Birch and Aspen, one participant distrusted that Aspen’s sharing practices would represent a bank’s actual business practices.

Limiting

- Participants were able to understand the “limit” link and expected the link to lead to an online opt-opt form.

Attitudes

Overall

- Some participants said they don’t normally read privacy information.
- Some participants said they would be more likely to read privacy information after seeing this page.
- Most participants came to the notice with concerns about the privacy and security of their personal information online.
- In the closing survey question about sharing, all participants said they thought all banks generally share in similar ways.
- In the closing survey question about who banks can share with, nearly all participants said they did not want their bank sharing their personal information with affiliates and nonaffiliates, even if it resulted in targeted services.