

Excercises “P3P”

Excercise 1:

Translate the P3P policy of

- www.explora.ch, a Web site of Explora Events AG, Zürich, or
- www.chiefaircraft.com, a Web site of Chief Aircraft Inc.

into a human readable form. Remember that you have to

- i) retrieve the P3P reference file,
- ii) retrieve the P3P policy file(s)

Optional: Compare the translated policy with the “official” policy (in the ‘pop-up window’).

Solution:

Explora First, we have to find the P3P policy reference file. The [explora.ch](http://www.explora.ch) server serves HTML content with embedded link tags that indicate the location of the relevant P3P policy reference file:

```
<link rel="P3Pv1" href="/w3c/p3p.xml">
```

This location is also the standard place to look for the P3P policy reference file – <http://www.explora.ch/w3c/p3p.xml>:

```
<META>
<POLICY-REFERENCES>
  <POLICY-REF about="http://www.explora.ch/privacy/p3p1.xml">
    <INCLUDE>*/</INCLUDE>
    <COOKIE-INCLUDE/>
  </POLICY-REF>
</POLICY-REFERENCES>
</META>
```

In that file we find the link to the P3P policy file <http://www.explora.ch/privacy/p3p1.xml> holding the P3P policy (some P3P comments are removed in below copy). Translated statements are intercepted into the P3P policy.

```
<POLICIES xmlns="http://www.w3.org/2001/09/P3Pv1">
  <!-- Expiry information for this policy -->
  <EXPIRY date="Sa, 01 Jan 2005 12:00:00 GMT"/>

  <POLICY discuri="http://www.explora.ch/de/contact/"
    opturi="http://www.explora.ch/de/contact/index.php"
    name="general">
    <!-- Description of the entity making this policy statement. -->
    <ENTITY>
      <DATA-GROUP>
        <DATA ref="#business.contact-info.telecom.telephone.number">+41 31 974 11 00</DATA>
        <DATA ref="#business.contact-info.online.email">info@explora.ch</DATA>
      </DATA-GROUP>
    </ENTITY>
  </POLICY>
</POLICIES>
```

```
<DATA ref="#business.contact-info.online.uri">http://www.explora.ch</DATA>
<DATA ref="#business.contact-info.postal.organization">explora.ch c/o Atelier Terra</DATA>
<DATA ref="#business.contact-info.postal.street">Hess-Strasse 27d</DATA>
<DATA ref="#business.contact-info.postal.city">Liebefeld</DATA>
<DATA ref="#business.contact-info.postal.postalcode">3097</DATA>
<DATA ref="#business.contact-info.postal.country">Switzerland</DATA>
<DATA ref="#business.name">explora.ch</DATA>
  </DATA-GROUP>
</ENTITY>
```

At [explora.ch](http://www.explora.ch), we care about your privacy. Questions regarding this privacy statements should be directed to:

explora.ch c/o Atelier Terra
Hess-Strasse 27d
3097 Liebefeld
Switzerland

+41 31 974 11 00
info@explora.ch
<http://www.explora.ch>

```
<!-- Disclosure -->
<ACCESS><contact-and-other/></ACCESS>
```

Changing and Updating personal information

Consumers can change all of their personal account information by going to the Kontakt section of [explora.ch](http://www.explora.ch) at <http://www.explora.ch/de/contact/index.php>.

```
<!-- Disputes -->
<DISPUTES-GROUP>
  <DISPUTES resolution-type="law"
    service="http://www.edsb.ch/frameese.html"
    short-description="Swiss Federal Data Protection Commissioner">
    <LONG-DESCRIPTION>
```

The Federal Data Protection Commissioner has in particular the following tasks:

- supervises federal bodies
- supervises private bodies
- advises private bodies
- assists federal and cantonal authorities in the field of data protection
- gives his opinion on draft Confederation legislation
- cooperates with data protection authorities in Switzerland and abroad
- informs the public about his findings and recommendations
- maintains and publishes the Register for Data Files

For the accomplishment of his tasks the Commissioner can investigate facts on his own initiative or at request of a third party. Based upon this investigations he can issue recommendations.

The Commissioner has in the private sector mainly a consultative function. In particular he explains and comments the legal provisions about Data Protection, offers his advice for the registration of data files, for the registration of transborder dataflows and for requests about of the right of access.

He also gives advice in questions concerning legal problems or technical aspects of data security. In conflict situations between private bodies or between private persons and federal bodies he tries to find solutions.

Eidgenoessischer Datenschutzbeauftragter
Feldeggweg 1
CH - 3003 Berne

Phone: +41 31 322 4395
Fax: +41 31 325 9996

e-mail:
info@edsb.ch

```
</LONG-DESCRIPTION>  
<!-- No remedies specified -->  
</DISPUTES>  
</DISPUTES-GROUP>
```

Disputes arising in connection with the privacy statement will be resolved in accordance with the Swiss Federal Data Protection Commissioner.

```
<!-- Statement for group "Basic information" -->  
<STATEMENT>  
<!-- Consequence -->  
<CONSEQUENCE>  
  Data collected from all Web users: access logs, and search strings (if entered).  
</CONSEQUENCE>  
<PURPOSE><admin/><current/><develop/></PURPOSE>  
<RECIPIENT><ours/></RECIPIENT>  
<RETENTION><indefinitely/></RETENTION>  
<DATA-GROUP>  
  <DATA ref="#dynamic.clickstream"/>  
  <DATA ref="#dynamic.http"/>  
</DATA-GROUP>  
</STATEMENT>
```

We record navigation and click-stream data as well as http header information. Your data will only be used by “ourselves and/or entities acting as our agents or entities for whom we are acting as an agent.”

```
<!-- Statement for group "Cookies" -->  
<STATEMENT>  
<CONSEQUENCE>  
Cookies are used to track visitors to our site, so we can better understand  
what portions of our site best serve you.  
</CONSEQUENCE>  
<PURPOSE><admin/></PURPOSE>  
<RECIPIENT><ours/></RECIPIENT>  
<RETENTION><no-retention/></RETENTION>  
<DATA-GROUP>  
  <DATA ref="#dynamic.cookies" optional="yes">  
    <CATEGORIES><online/><uniqueid/></CATEGORIES>  
  </DATA>  
</DATA-GROUP>  
</STATEMENT>
```

Cookies are used to track visitors to our site, so we can better understand what portions of our site best serve you.

```
<!-- Statement for group "Mailing registration" -->
<STATEMENT>
  <CONSEQUENCE>This information is collected so that we can send you valuable and useful
  information which is relevant to your needs and interests.</CONSEQUENCE>
  <PURPOSE><contact/><current/></PURPOSE>
  <RECIPIENT><ours/></RECIPIENT>
  <RETENTION><indefinitely/></RETENTION>
  <DATA-GROUP>
    <DATA ref="#dynamic.miscdata" optional="yes">
      <CATEGORIES><physical/></CATEGORIES>
    </DATA>
    <DATA ref="#dynamic.miscdata">
      <CATEGORIES><online/></CATEGORIES>
    </DATA>
    <DATA ref="#dynamic.miscdata">
      <CATEGORIES><demographic/></CATEGORIES>
    </DATA>
  </DATA-GROUP>
</STATEMENT>
```

If you consent we collect Physical Contact Information that allows us to contact you by telephone or mail. Additionally, we collect Online Contact Information to contact you on the Internet. We further collect Demographic and Socioeconomic data about you such as gender, age, and income.

```
<!-- End of policy -->
</POLICY>
</POLICIES>
```

Finally, we can now compare (above) P3P policy with the human-readable text.
Persönliche Daten / Privacy Policy

explora.ch hält sich an das schweizerische Datenschutz- und Fernmelderecht. Gespeichert und ausgewertet werden nur Daten, die für den Verbindungsaufbau, für eine Gewährleistung eines hohen Dienstleistungsniveaus, für die technische Betriebssicherheit und zur Fakturierung erforderlich sind. explora.ch verwendet im übrigen keine personenbezogenen Daten über die Nutzung von Dienstleistungen im Zusammenhang mit dem Internet ohne das Einverständnis der betroffenen Kundschaft. Cookies werden ausschliesslich zur Optimierung technischer Abläufe verwendet.

Chief Aircraft Inc. The approach is the same. Find a detailed English text at <http://www.chiefaircraft.com/Info/p3p.html>.

Excercise 2:

Generate a P3P policy for Web site <http://www.slrghwaedi.ch>, which reflects below (fictious) privacy policy:

SLRG Wädi respects the privacy of visitors to its site. This privacy policy explains what type of information we collect from our users on this site and in the course of our relationship, what we do with that information, and how users can update and

control the use of information provided on this site. This policy may change from time to time so please check it frequently.

Please feel free to contact us if you have questions or concerns about this privacy policy or about SLRG Wädi's collection of your information:

SLRG Wädi
Schaeferallee 1
9920 Waedi
Switzerland

Telephone +41 (0)44 - 4190-251
email: privacy@slrgwaedi.ch

We are licensee of the BestPrivacySeal program. If we have not responded to your inquiry or your inquiry has not been satisfactorily addressed, you can contact Best Priv@cy – www.bestprivacy.ch. We will correct all errors or wrongful actions arising in connection with this privacy policy.

Our Web server collects access logs containing information about your computer and connection to make sure that we can get you the proper information and for security purposes.

If you use our site to enroll in swim courses, we may collect additional course registration information including:

- your name and address for our records;
- your email address so that we can easily contact you;
- optionally, you can enter phone and/or mobile phone number so that we can contact you;
- your birthday to check whether you satisfy the course requirements.

In addition, SLRG Wädi may collect and maintain your course credit history.

You are welcome to browse most portions of the SLRG Wädi web site without becoming a registered user. For our Kurs Quiz, we will ask that you register if you have not already done so and provide us with a nickname and an email address.

We do not sell your email address or other identifying information to third parties. We may, however, share your information with other organizations that are part of the Schweizerische Lebensrettungs-Gesellschaft SLRG.

Solution:

```
<POLICIES xmlns="http://www.w3.org/p3p">
  <POLICY discuri="/w3c/policies/humanReadable/humanreadable_waedi_DefaultPolicy.html"
    name="DefaultPolicy" opturi="">
    <ENTITY>
      <DATA-GROUP xmlns="http://www.w3.org/2002/01/P3Pv1">
        <DATA ref="#business.name">SLRG Waedi</DATA>
        <DATA ref="#business.contact-info.postal.name.given"/>
        <DATA ref="#business.contact-info.postal.name.family"/>
        <DATA ref="#business.contact-info.postal.street">Schaeferallee 1 </DATA>
        <DATA ref="#business.contact-info.postal.city">Waedi</DATA>
        <DATA ref="#business.contact-info.postal.stateprov"/>
        <DATA ref="#business.contact-info.postal.postalcode">9920</DATA>
        <DATA ref="#business.contact-info.postal.country">Switzerland</DATA>
        <DATA ref="#business.contact-info.online.email">privacy@slrgwaedi.ch</DATA>
        <DATA ref="#business.contact-info.telecom.telephone.intcode">+41</DATA>
        <DATA ref="#business.contact-info.telecom.telephone.loccode">44</DATA>
      </DATA-GROUP>
    </ENTITY>
  </POLICY>
</POLICIES>
```

```

        <DATA ref="#business.contact-info.telecom.telephone.number">4190-251</DATA>
    </DATA-GROUP>
</ENTITY>
<ACCESS>
    <ident-contact/>
</ACCESS>
<DISPUTES-GROUP>
    <DISPUTES resolution-type="independent"
        service="http://www.slrwaedi.ch/contact/"
        short-description=""
        verification="www.bestprivacy.ch">
        <REMEDIES>
            <correct/>
        </REMEDIES>
    </DISPUTES>
</DISPUTES-GROUP>

<!-- Statement for group "Swim course registration" -->
<STATEMENT>
    <CONSEQUENCE>
        If you use our site to enroll in swim courses, we may collect additional course
        registration information including your name, address, e-mail address, and optionally,
        your phone and/or mobile phone number. In particular, we need your birthdate to verify
        age requirements.
    </CONSEQUENCE>
    <PURPOSE><admin/><current/></PURPOSE>
    <RECIPIENT><ours/></RECIPIENT>
    <RETENTION><stated-purpose/></RETENTION>
    <DATA-GROUP>
        <DATA ref="#user.name"/>
        <DATA ref="#user.contact-info.postal"/>
        <DATA ref="#user.contact-info.online.email"/>
        <DATA ref="#user.contact-info.telecom.telephone" optional="yes"/>
        <DATA ref="#user.contact-info.telecom.mobile" optional="yes"/>
        <DATA ref="#user.bdate.ymd.year"/>
    </DATA-GROUP>
</STATEMENT>

<!-- Statement for group "Kurs quiz" -->
<STATEMENT>
    <CONSEQUENCE>
        For our Kurs Quiz, we will ask that you register if you
        have not already done so and provide us with a nickname and an email address.
    </CONSEQUENCE>
    <PURPOSE><current/><pseudo-decision/></PURPOSE>
    <RECIPIENT><ours/></RECIPIENT>
    <RETENTION><stated-purpose/></RETENTION>
    <DATA-GROUP>
        <DATA ref="#user.name.nickname"/>
        <DATA ref="#user.contact-info.online.email"/>
    </DATA-GROUP>
</STATEMENT>

<!-- Statement for group "Access log information" -->
<STATEMENT>

```

```
<CONSEQUENCE>
  Our Web server collects access logs containing information about your computer
  and connection to make sure that we can get you the proper information and for
  security purposes.
</CONSEQUENCE>
<PURPOSE><admin/><develop/></PURPOSE>
<RECIPIENT><ours/></RECIPIENT>
<RETENTION><legal-requirement/></RETENTION>
<DATA-GROUP>
  <DATA ref="#dynamic.clickstream"/>
  <DATA ref="#dynamic.http"/>
</DATA-GROUP>
</STATEMENT>
</POLICY>
</POLICIES>
```

Hints

The Web site of Chief Aircraft Inc. has a good P3P privacy policy. See <http://www.chiefaircraft.com/Info/p3p.html> for the English counterpart.

Their policy defines a maximal age of 1 day:

```
<EXPIRAY max-age="86400"/>
```

which they translate into:

This policy is valid for 1 day from the time that it is loaded by a client.

