

MOBILE APP VOLUNTARY TRANSPARENCY SCREENS**I. Preamble: Principles Guiding App Transparency**

The application developers industry, in coordination with leading privacy, civil liberties and consumer advocates, offers these discussion draft transparency screens (hereinafter “Mobile App VTS” or “VTS”) for consideration by all stakeholders in the mobile app ecosystem. The purpose of these short form notices is to enhance transparency about apps’ data collection and third party sharing.

This Mobile App VTS document builds on the best practices implemented by other industries and incorporates guidance from consumer experts, leading app developers and mobile user interface designers to benefit consumers. A voluntary model can be the foundation for continued innovation. The transparency created by consistently displaying this information will help consumers compare and contrast data practices of apps. This will enhance consumer trust

App developers are committed to earning and keeping consumers’ trust, as this is central to the growth and enhancement of the apps industry. Trust is earned through clear explanations of what each app does and through actions that are consistent with those explanations. The goal is to balance the objectives of transparency, brevity, and functionality.

- **Transparency:** Consumers expect clear, succinct explanations of an app’s data collection and third party data sharing policies.
- **Brevity:** Short form notices must enhance app transparency and understanding in context.
- **Functionality:** App developers need transparency standards that they can easily implement in the context of an app without diminishing the user experience.
- Consumers hold a spectrum of attitudes towards sharing their data with apps. Consumers’ willingness to share data will vary with context and time, and apps should facilitate those choices.
- Regulators, legislators, and privacy and consumer advocates all seek a fair balance among all of the interests involved, recognizing some consumers’ choice to share data with apps in exchange for a wide variety of tools, content, entertainment.
- Apps will evolve over time to offer fixes, enhancements, and changes to the original functionality. Apps may need to offer new functionality and/or they may need to adapt their business models. When apps’ data policies evolve in material ways, the apps must promptly and prominently update their disclosures to consumers.
- Continued work will need to be done to help integrate the full range of fair information practices with effective methods of transparency for innovative data uses. App developers understand that the implementation of these principles is just one aspect of satisfying consumer expectations and they commit to leading their industry to develop common practices and tools that

Mobile App Voluntary Transparency Screens

adhere to fair information practices (these principles include access to personal information, control over storing information and sharing it with third parties).

- App Developers who adhere to this code of conduct and provide short form notice as described in Section II, are engaging in a best practice that significantly enhances transparency of data practices.
- This code reflects the state of industry best practices for transparency. Although compliance with the code and provision of a short form notice does not guarantee that any individual developer is providing an accurate notice for their specific practices, the authors of this code believe that compliance with the standardization provided by this notice should be a compelling factor serving to limit claims that a notice is deficient.

II. Short Form Notices

Participating application developers and publishers that voluntarily implement the Mobile App VTS shall detail:

- (i) Data collected from consumers; and,
- (ii) Third party data sharing, if any.

These practices shall be outlined in “short form notices” that shall convey information to app consumers in a consistent manner that is easy for consumers to read and understand. This should include multiple languages, if possible.

Participating apps should display this information in a single screen where possible. The following elements must be included in the standardized text, which should not change; icons may be added to the standardized text listed but may not replace text.

A. Data Collected

Apps shall inform consumers when they collect user-associated data from the following categories:

- **Biometrics** (Data about your body, including fingerprints, facial and other body measurements, signatures and/or voice print.)
- **Browser History and Phone or Text Log** (A list of websites you’ve visited, or the calls or texts you have made or received.)
- **Contacts** (Includes list of contacts, social networking connections or their phone numbers, postal, email and text addresses.)
- **Financial Information** (Includes credit, bank and consumer-specific financial information such as transaction data.)
- **Health, Medical or Therapy Information** (Including health claims and information used to measure health or wellness.)
- **Location** (Precise past or current location and history of where you have gone.)

Mobile App Voluntary Transparency Screens

- User Files (Files stored on your device such as calendar, pictures, text, and video.)

We anticipate that these data elements may be modified over time in response to advances of technology. App developers shall employ a mechanism that facilitates ready consumer access to expanded definitions of each data element.

B. Data Shared

Apps shall state whether they share data with any entities from the following list:

- **Ad Networks** (Companies that display ads to you through apps.)
- **App Publisher or Other Apps** (The company that built, owns, or controls the app, or other apps that you may not have a relationship with.)
- **Carriers** (Companies that provide mobile connections.)
- **Data analytics** (Companies that collect and analyze your data.)
- **Government Entities** (Any sharing with the government except where required by law.)
- **Information Brokers** (Companies that buy, sell, or share your personally identifiable information to other companies.)
- **Operating Systems and Platforms** (Software companies that power your device, app stores, and companies that provide common tools and information for apps about app consumers.)
- **Social Networks** (Companies that connect individuals around common interests.)

All the standards here may be modified over time in response to advances of technology. App developers shall employ a mechanism that allows for consumers to easily and promptly access expanded, standardized, plain language explanations of each entity.

Notwithstanding the disclosure requirement stated in this section, apps shall not be required to disclose sharing with third party entities where a contract between the app and the third party explicitly:

- (i) limits the uses of any consumer data provided by the app to the third party solely to services rendered to the app; and,
- (ii) prohibits the sharing of the consumer data with subsequent third parties.

C. New Collection and Sharing

As new methods of collection, use and sharing continue to evolve, this Model App VTS will be updated. To facilitate ease of use for app developers and consumers, this Model App VTS identifies well-known and common current practices. If, however, an app collects, uses or shares data that is reasonably likely to be of concern to consumers, it should add these items to their disclosure.

III. Short Form Design Elements

The model short form notices provided in Appendix 1 to this document present potential designs for mobile app transparency. Given the different screen sizes, form factors, User Interface (“UI”) options and range of sensors available on devices, these specific implementations may vary. New methods of data collection, new uses, and new types of devices and sensors may require updates to these forms. To be compliant with this Mobile App VTS, app developers must ensure the following are implemented consistent with the design of the app:

- A. All Data Collected described in II.A are listed;
- B. All Data Shared described in II.B are listed;
- C. New Types of Collection and Sharing as described in II.C are listed;
- D. Items A, B and C to be provided as a list, with items A and B visually separated from each other.
- E. Text and font shall be distinct so as to easily stand out from the page background.

We believe it is necessary to provide notice in multiple languages, and anticipate that some developers will pursue this option. If so, these forms are adaptable to that option.

IV. Linkage to Data Usage, Terms of Use and/or Long Form Privacy Policies

In addition to implementing short form notices, participating app developers and publishers shall provide ready access for consumers to each participating app’s data usage, terms of use, or long form privacy policy where legally required. These links should include explanations of how consumers may request deletion of their data collected by the app, if such deletion is available.