



POLICY

DEVELOPMENT



In the context of privacy policies, violations can be

- intentional or
- unintentional.

While the use of templates can certainly save human and financial resources, it may also cause financial and reputational harm to the organisations relying solely on templates.

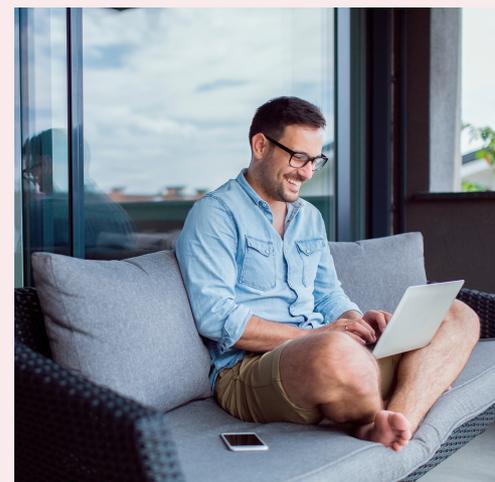
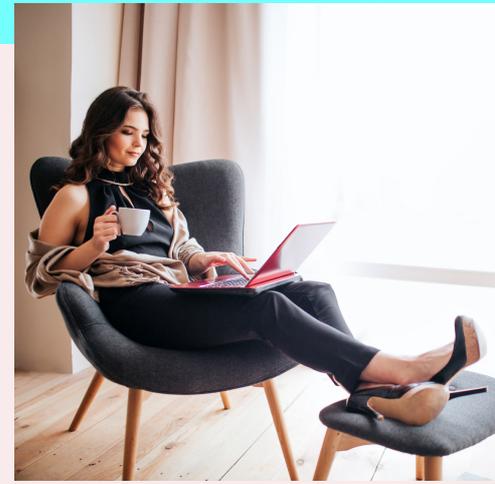
Privacy policies should be continuously updated to reflect practical and regulatory requirements.

The documents should include provisions regarding organisations' acceptable use policies, training programs aiming to raise information security awareness, incident response practices, and specific requirements aiming to protect privacy & security programme infrastructure.

Policy documents may prevent privacy & security breaches and mitigate their consequences. Well-drafted policies play an important role in investigating privacy breaches because they may reveal the information privacy & security vulnerabilities used for conducting them.

It is not enough to assume that the organisation that used the template adheres and complies with all the clauses stated in the security policy template.

Each clause and statement contained in the template should be reviewed and adapted to that particular organisation and meet its real security practices.



Intentional: negligent representations are made without organisation's conscious clear belief that they are true

Unintentional: negligent representations may occur if the privacy policy is blindly copied from a purchased or freely downloaded template, without modifying it for meeting the particular characteristics and needs of the organisation.



The Thing about Templates

PRIVACY POLICY

We collect information to provide better services to all of our users – from figuring out basic stuff like which language you speak, to more complex things like which ads you’ll find most useful, the people who matter most to you online, or which YouTube videos you might like.

We collect information in the following ways:

Information you give us. For example, many of our services require you to sign up for a Google Account. When you do, we’ll ask for personal information, like your name, email address, telephone number or credit card to store with your account. If you want to take full advantage of the sharing features we offer, we might also ask you to create a publicly visible Google Profile, which may include your name and photo.

Information we get from your use of our services. We collect information about the services that you use and how you use them, like when you watch a video on YouTube, visit a website that uses our advertising services, or view and interact with our ads and content. This information includes:

Device information

We collect device-specific information (such as your hardware model, operating system version, unique device identifiers, and mobile network information including phone number). Google may associate your device identifiers or phone number with your Google Account.

Log information

When you use our services or view content provided by Google, we automatically collect and store certain information in server logs. This includes:

Misleading commercial practice

Defined as acts performed by an organisation that deceive an average consumer regarding the nature, characteristics, and pricing of the product or service offered as well as the extent of company’s commitments to its customers.

By simply copying a privacy policy template without adjusting it to your organisation’s needs, you could be deemed to mislead consumers.



Negligent misrepresentation

The contract laws of England and other Commonwealth countries use the concept of negligent misrepresentation – when a natural or legal person carelessly makes a representation without having a reasonable basis to believe it is true.

Example: if a company induces its clients to sign contracts with it by falsely stating that it protects personal information by using encryption, the clients may be entitled to invalidate the contract and get damages.



Business risks related to the use of privacy policy templates

When not properly vetted, templates can introduce a myriad of risks to entities.

- risks of violating laws prohibiting misleading commercial practices
- risk of violating laws prohibiting negligent representations

