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Re: Privacy Policies of Amazon.com, the Social Security Administration, the University of Minnesota, and US Airways Vacations

The purpose of this memorandum is to compare the features of the privacy policies listed above. Included here is information pertaining to the personal data collected by these agencies. Specifically, how they collect it, why they collect it, who these agencies share it with, what kind of access the user/customer has to their information stored with these companies, and what kind of security is used to protect this information.

The only method of information collecting that is common among all of the agencies is the use of cookies. Each agency's privacy policy has a section solely devoted to cookies as well as other sections devoted to other ways information about its customers / users is gathered.

Amazon's privacy policy has a section on the types of information collected and the ways in which it is gathered. These methods are listed in the table below. There is a separate section regarding cookies. It lists the types of services that are available only if the user has their browser configured to accept cookies, and then mentions how one might prevent their browser from accepting cookies. No specification is made about the types of cookies used or the types of information collected using cookies. However, for each of the other methods that Amazon.com uses to gather information on their customers, they have a link to some examples of the types of information collected.

The Social Security Administration has fewer methods than Amazon.com for collecting user information. The SSA policy specifies that it gathers personal information about its users only if it is knowingly and willingly given by the user. Other information is collected only through the use of cookies. The SSA policy then describes what a cookie is, what kinds of cookies exist, what kind of cookie the SSA uses, when and where it is used, the purpose of using cookies, and when the cookie is erased. No specific information about the type of information collected by the cookies is mentioned.

The University of Minnesota, like the SSA, also uses cookies but does not specify what types of cookies are used. The University policy lists the two purposes the cookies are used for. Then, like the Amazon, mentions how the user can configure their browser setting so they no longer receive cookies. The functionality of the website may be impaired if the cookies are disabled. No specification is made about the types of information collected by using cookies. In addition to cookies, the University of Minnesota has only one other way in which information about its users is gathered. This method is listed in the table below. The University policy lists examples of the types of information collected via this method.

US Airways Vacations has ways similar to Amazon.com for collecting information about its customers. These methods are listed in the table below. A list of the specific types of information gathered is printed in the policy. Like all of the other policies examined here, US Airways Vacations has a separate section describing their use of cookies and the information they gather. The policy does not specify what type of cookies are used. However, unlike the other three policies, it does mention some specific types of information collected through the use of cookies.

How is the information collected?

| Amazon.com | Social Security Administration | University of Minnesota | US Airways Vacations |
|--|---|---|--|
| <ul style="list-style-type: none">• Through the use of cookies• Users voluntarily provide information• From email communications• Other sources (not specified) | <ul style="list-style-type: none">• Session cookies | <ul style="list-style-type: none">• Through the use of cookies• Through the process of monitoring and securing their network | <ul style="list-style-type: none">• Through the use of cookies• When users sign up to receive emails• Use of the online booking form• Use of an online customer service request |

Why is this information interesting to these companies? These companies want customer information so they can put it to some use. The next logical point to cover is how the companies use this information.

Amazon's goal is to improve their website, customer satisfaction, and business. Similarly, US Airways Vacations uses the information they gather about customers for the same purpose. These purposes are listed in the table below.

Unlike Amazon.com and US Airways Vacations, the SSA and University of Minnesota use their information for a different purpose. The SSA's only purpose to collect customer information is so that they can administer their program. The University of Minnesota uses the information they gather solely to improve their website and service.

Why the information is collected?

| Amazon.com | The Social Security Administration | The University of Minnesota | US Airways Vacations |
|---|---|---|--|
| <ul style="list-style-type: none"> • To respond to requests • To customize future shopping • Improve stores • To communicate with customers • To make emails more useful and interesting | <ul style="list-style-type: none"> • To administer the Social Security Program | <ul style="list-style-type: none"> • To help manage website • Improve service | <ul style="list-style-type: none"> • To send promotional emails • To process online orders • To assist with customer service requests • To create customer mailing lists • To review and improve products, promotions, customer service • To track promotional success • To share site usage with business partners |

From the two tables presented above, it is evident that the University and Federal websites implement fewer ways of collecting information and using it than the other two companies do.

Amazon.com and US Airways Vacations both have numerous ways of collecting information about their customers. They also both use that information in many more ways than the SSA and University of Minnesota do. Amazon.com and US Airways Vacations, unlike the SSA and the University of Minnesota, both state that one of their purposes is to promote future use of their services. They also both have numerous reasons for collecting customer information other than simply to provide their service. Perhaps these reasons also affect who these companies allow to have access to the information they gather. It becomes necessary to examine what outside parties are allowed access to customer information.

As can be seen in the table below, the SSA and the University of Minnesota do not give out information to anyone unless it is required by law or unless the user authorizes it. This is not true for Amazon.com and US Airways Vacations. Unlike the SSA and the University, both companies share non personal information with their business partners and affiliates, and do not require authorization by the customer/ user in those cases.

Who can get user information from these agencies?

| Amazon.com | The Social Security Administration | The University of Minnesota | US Airways Vacation |
|---|--|--|--|
| <ul style="list-style-type: none"> • Subsidiaries of Amazon.com • Affiliated businesses operating stores on the Amazon.com website • Agents employed to perform functions on behalf of Amazon.com • Business that acquire a store or business unit of Amazon.com may obtain customer information as a transferable asset • Anyone to whom the law require the release of information • Third parties the customer/ user authorizes to receive their information | <ul style="list-style-type: none"> • Any party to whom Federal Law requires release of information • Third parties to whom the user/ customer authorizes access to their information | <ul style="list-style-type: none"> • No party can have access to personally identifying information about any customer without consent of the customer unless required by law | <ul style="list-style-type: none"> • Outside parties involved in an order • Business partners can access non personal information • Outside parties through consent of the customer or if required by law |

The next point to note is what kind of access the user has to their information. The table below highlights the ways in which a user can access the information about them stored with each of the four companies noted in this memo.

Amazon.com states that users can access a broad range of their information for the purpose of viewing and updating. They also have a link to examples of information that can be accessed by users. Like Amazon.com, the University of Minnesota does not specifically state what access the user has to their information. In fact, there is no reference to users' access to their information at all in their privacy policy.

The Social Security Administration is the only agency mentioned here that permits unlimited user modification of and access to their information. Similarly, US Airways Vacations allows users to access and update their information. However, US Airways restricts this access and modification to information that personally identifies the customer.

What information can be accessed by users/ customers?

| Amazon.com | The Social Security Administration | The University of Minnesota | US Airways Vacation |
|---|--|---|--|
| <ul style="list-style-type: none"> • Some, but not specified | <ul style="list-style-type: none"> • All information about the user | <ul style="list-style-type: none"> • Not mentioned | <ul style="list-style-type: none"> • Identifiable information submitted by the customer |

The last point to note regarding the privacy policies examined here is the security used to protect customer information. Amazon and US Airways vacations are the only two to specify the use of SSL. Amazon goes one step further to warn its customers against unauthorized access of their computers and passwords. The SSA does not specify the methods of security they use. However, note that the SSA warns its users of the insecurity of email, and urges their customers not to send any personal information via email. Amazon does not warn its customers of this, yet Amazon clearly states that email is one of the ways in which communication is facilitated with its customers. The table below lists the security measures for each company.

What security measures are implemented to protect customer information?

| Amazon.com | The Social Security Administration | The University of Minnesota | US Airways Vacation |
|---|--|---|--|
| <ul style="list-style-type: none"> • SSL to encrypt user input during transmission • Only the last 5 digits of credit card revealed to confirm order • Warn users to sign off when finished • Warn users to protect against unauthorized access to their computer | <ul style="list-style-type: none"> • Ensures the agreement with any third party requires the protection of user data • Reasonable precautions to maintain security, confidentiality, and integrity of data they maintain | <ul style="list-style-type: none"> • Not mentioned | <ul style="list-style-type: none"> • Implement appropriate physical, electronic, and managerial procedures • Use SSL to encrypt personal information |

Neither the Federally owned nor the University owned websites specify any particular method of securing customer information. The security measures stated by the US Airways and Amazon.com policies are the only ones to specifically mention SSL. The other two companies are nonspecific when it comes to the topic of customer information security.

Here, it can be seen that in terms of security and access, the University policy does not go into any detail at all, while some of the other policies get very specific in these areas. On the other hand, the University has a strict policy on sharing information while the other policies allow for a wider range of third parties to have access to their customer information. From the information presented in this memo it is clear that the methods of collecting, using, sharing, and securing customer information vary among different websites. Further, the detail that each organization presents on each topic in its policy can differ greatly as well.