An Ontology Design Pattern for Describing Personal Data in Privacy Policies

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https://opencourse.adaptcentre.ie/
What is a Privacy Policy?

A Legal Document that “may” or “may not” inform you about the privacy of your data

- monolithic text document
- verbose | long length
- difficult to read & understand

“Can’t say. It’s private.”
1. Usable Privacy Project
   https://usableprivacy.org/

2. Terms of Service; Didn’t Read
   https://tosdr.org

3. Privacy Guide

4. Pribot
   https://pribot.org/
Consolidate Information

- different approaches → same information
- same information → different ‘ontologies’
- different ‘ontologies’ → same underlying concepts
Scope - ODP: Privacy Policy Metadata

1. Information about Personal Data
2. Information within Privacy Policy
3. From GDPR-ready policies

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Comptency Questions

1. What personal data is collected? e.g. email
2. Does the data have a category? e.g. contact information
3. What was its source? e.g. user
4. How is it collected? e.g. given by user, automated
5. What is it used for? e.g. creating an account, authentication and verification
6. How long is it retained for? e.g. 90 days after account deletion
7. Who is it shared with? e.g. name of partner organisation(s)
8. What is the legal basis? e.g. given consent, legitimate use
9. What processes/purposes was the data shared for? e.g. analytics, marketing
10. What is the legal type of third party? e.g. processor, controller, authority
11. How can personal data be rectified or corrected?
12. How can personal data be deleted or removed?
13. How can a copy of the personal data be obtained?
14. How can personal data be transferred to another party?
15. How can information about the personal data be obtained?

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1. Level of abstraction; e.g. storage, sharing, time

2. Privacy Policy as a document

3. Break into Smaller Patterns???
   - more verbose
   - modular
   - difficult to integrate
End of Presentation

Problem Domain

- Privacy Policy is a legal document that specifies information regarding the use of Personal Data amongst other things.
- This information needs to be represented as machine-readable metadata to enable machine-based approaches over it.
- Approaches that work with Privacy Policies have their own internal representation of this metadata specific to their aims.
- It is difficult to maintain consistency and standardization on privacy policies as a document itself.

Solution Sphere

1. Identify relevant information that is common to all privacy policies.
2. Incorporate legal requirements from General Data Protection Regulation (GDPR).
3. Use existing vocabularies to represent concepts and relations.
4. Define an ODP that can be incorporated into ontologies or used as a mapping between approaches.
5. Create a corpus of privacy policy metadata using ODP → future work!

--- MORE AT POSTER SESSION ---