

## Unique Features of the Privacy Facts Interactive Notice (PFIN)

Version 1.03

- 1. Users (Data Subjects) tend to immediately recognize the familiar Nutrition Facts grid format and instinctively use it to source key points of information before making a buying decision.
- 2. Adding "just-in-time" layered interactive response to elements of the nutrition format transforms it into a multi-layered Privacy Facts grid wherein the blue cues trigger up to five levels of flexible, configurable "drill down" information underlying each grid element.
- 3. PFIN is interactive. The PFIN format lets users control, direct, and pace each privacy briefing as they navigate around or through the grid without regard to order, speed, and depth of attention.
- 4. The PFIN format supports an active real time dialogue between user and business (Data Controller). Under GDPR, DC/DS dialogue is a <u>necessary element</u> for gathering informed consent, for declaring and balancing legitimate interest, and for presenting and negotiating individual rights.
- 5. Each line or "element" within the PFIN stack (left prompt, right cue and drill down content) is fully configurable by privacy pros using PrivacyCheq's content management system specifically designed for privacy notices. Selection, order, and the addition of new elements is supported as well.
- 6. PFIN is optimized to present key privacy facts, not a privacy policy. A link to DC's full privacy policy will commonly be offered as an element low within the PFIN stack.
- 7. PFIN can sow the seeds of DS/DC trust while reducing the inherent friction in implementing informed consent and legitimate interest. An impatient user can (in the moment) choose to quickly opt around (ignore) the PFIN disclosure, secure and trusting in the fact that full transparency remains available and can be reviewed later on demand. As trust is built, touchpoint friction is reduced as complete trust is approached.
- 8. Under the rules of Transparency and modalities in GDPR Articles 12 and 13, the Data Controller shall provide users with explicit, specific, informed, concise, intelligible, easily accessible, transparent notice in support of and prior to DS consenting to PI collection and subsequent processing by DC. PFIN and its associated authoring tools and templates fully supports these transparency requirements.
- PFIN's overriding purpose is to solve the transparency disconnect associated with consumers' sharing of personal information with others. PFIN has been built on the foundational <u>Privacy by</u> <u>Design</u> (PbD) principles as developed by Dr. Ann Cavoukian. Privacy engineering development has been inspired and guided by associates at Carnegie Mellon University and the University of Michigan.
- 10. PFIN is ready for deployment. Parties interested should contact info@privacycheq.com.

