



Privacy Policy Template

1.0 Purpose

To provide our members a template that can be modified for your company's use in developing a Privacy Policy. This privacy policy template complements the NCSS's guide titled "How to Conduct a Privacy Impact Assessment" found on our website under How-To-Guides. This policy is to disclose what personal data you collect from your website's visitors, how you collect it, how you use it and other important details about your privacy practices.

The privacy laws and privacy policy requirements are based on the jurisdiction your business is based in and the jurisdiction(s) where your site visitors live. CHECK your state's data breach notification and privacy laws. As an example, California has a requirement to have a Do Not Track clause in your privacy policy.

2.0 Policy

Privacy Policies are legally binding agreements you are required to post on your website if you're collecting any sort of personal information from your site's visitors or customers. A Privacy Policy is an important legal document that lets users understand the various ways a website might be collecting personal information. The purpose of a Privacy Policy is to inform your users of your data collection practices in order to protect the customer's privacy.

In this section, disclose how the website/app collects information, how the information is used, whether it is shared with third parties and how it is protected and stored. There are 3 main reasons for having a Privacy Policy: (1) you're required by law, (2) you're required by third party services, (3) you want to be transparent.

3.0 Information Detail

In this section, define the types of information you collect on your website visitors. Most Privacy Policies start out by disclosing this type of information the business collects from its visitors or customers. This section lets the visitor know which type of personal information they can expect to provide, whether required or optional and the type of transaction. As an example, describe that you are collecting the address of the individual in order to validate the credit card transaction.

4.0 Information Collection and Use

In this section, you are required to disclose **how you process and share** the personal information you collect from your site's visitors. It should explain what you do with the information after you've collected it. This section is the most important section of the entire document where you need to inform users what kind of personal information you collect and how you are using that information.

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A **Log Data** disclosure section should be included if data is collected automatically from the web browser users are using and through the web server you're using: IP addresses, browser types (Firefox, Chrome etc.), browser versions and various pages that users are visiting.

A **Cookies** disclosure should be included if you use cookies and how cookies are used when the visitors interact with your site. This applies even if you use Google Analytics (which would store cookies) or any other third party that would store cookies.

5.0 Links to Other Sites

In this section, disclose whether your website links to other websites outside your control or ownership, i.e. linking to a news website, and that users are advised to read the Privacy Policies of each website they visit.

6.0 Other Clauses to Consider

A. Do Not Track. If your website collects any personal information from residents of the state of California, you must comply with the California Online Privacy Protection Act (CalOPPA).

One of the main requirements of CalOPPA is that you have a privacy policy. CalOPPA **also requires** that you include a Do Not Track (DNT) clause in the Policy.

A DNT clause is where you let your users know **whether or not you respond to their DNT requests**. You aren't required to respond to requests, but you're required to disclose whether you do or not. Include disclosure in this section.

B. Security. A Security disclosure in the policy can give users assurance that their personal data is well protected. You can include it here or in the section below.

7.0 Data Storage Procedures and Protection

In this section explain your company's policy and procedures on protecting the personal information you collect. Describe how the data is encrypted at rest and access to the data is controlled.

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8.0 Data Retention

Lastly, the document should include a section on data retention. You may want to consider having a separate data retention policy for your business, and if you do, reference it here. The retention schedule lists the type of data, the record name, how long the record will be maintained and when and how it will be destroyed. You can list the data collected from your website here and how long the record is maintained and how it will be destroyed when no longer needed.

9.0 Third Party Services

Check the Terms of Services/Terms of Use of any third-party services that your website or application uses. Add a section to your policy that explains this relationship and that the third party service provider is responsible for the privacy policy of that application.

10.0 Applicability

A. This policy is applicable to your company's website.

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