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operating arrangements with government agencies and industry organizations. "4 These organizations, and many others like them, provide voluntary, self-regulatory self-regulation to their respective industries, with the active support of business sponsors and relevant government bodies. Organizations should develop procedures to protect passwords and prevent employees from accessing data for unauthorized purposes. This solution involves individuals with means of quickly determining a site's information practices. They are simply two examples of the kind of grass-roots effort at self-regulation in all spheres that may well benefit of the Net. Authentication There are typically three types of authentication mechanisms: something you know, something you have, or something you are. But technology can promote accountability as well as anonymity. An audit by an accounting firm is a much better way of fostering compliance than a lot of regulations. Third-party exchange: The service may disclose individual or transaction data to third parties, provided it explains what personally identifiable information is being gathered, what the information is used for, and with whom the information is being shared. In such interactions individuals do not reveal their true identity, but reveal pseudonyms instead. TRANSACTIONS THAT REVEAL MINIMAL PERSONAL INFORMATION Another approach to safeguarding personal information is to minimize the need for collecting such information or minimize the number of times the information must be accessed. Other sources of challenges are whistle-blowing employees or aggrieved users, although it's usually difficult to figure out who compromised privacy. They also demonstrate the potential viability of an analogous entity to serve the interests of online privacy and security. Juno, for example, offers customers free e-mail in exchange for exposure to specific advertising based on the user's characteristics. Violations could include license revocation under appropriate circumstances. Traditional operating system and data base management controls have been joined recently by firewalls which check that only properly authorized (and sometimes paid-up) users are allowed access. The individual might have used a pseudonym in her relationship with the vendor, allowing the vendor to keep a profile of her preferences and maintain information about the state of her virtual shopping cart. The initial steps are cancellation of the right to use the logo and posting the wrong-doer on a "bad-actors" list; of course, the wrongdoer has to pay the costs of determining its non-compliance and ultimately could be sued for fraud. There are two groups that can deliver this message most effectively: the accounting firms who see privacy attestation as a business opportunity; and customers themselves,assuring that the message is true. For example, a vocabulary might encode the categories used in existing icon-based systems, "When we hit a million members, major advertisers started returning our calls," he says. PICS can accommodate any labeling vocabulary, currently several vocabularies are in use that indicate either age-appropriateness or the presence of potentially objectionable content such as offensive language or nudity. If you establish a right--whether it's for clean air, privacy, a pound of potatoes or a copy of a newsletter--that right will be allocated efficiently in a free market, regardless to whom it is worth more.3 That is, the market looks at the difference between the two sides' preferences, and the right goes to whomever values it more, a corresponding amount of value may change hands in the opposite direction. eTRUST seeks to emulate the successful, relevant aspects of these organizations in developing its operating model. However, that wasn't always true. Some of the problems inherent in icon-based systems can be overcome by a machine-readable label system. ftp://ftp.research. [von Solms 1992] von Solms, S. Remember the Customer! Little can be done without a clear customer benefit. Direct marketers have shown increasing creativity in developing new channels to gather highly valued customer information in the offline world. To that end, eTRUST welcomes involvement, support and sponsorship from relevant business and government entities in helping to build an effective structure for industry self-regulation and growth. Founder Tara Lemmey understands that a primary feature of the Internet is its support for reaching market segments, instead of broadcasting the same message to everyone--even if you don't know each one individually. Do the contracts governing the use of data survive a bankruptcy proceeding? The major challenge in privacy comes once personal data leaves any particular Web site. On the other hand, if she values her privacy less, she may sell the privacy--the right to call her--to WonderWidgets for that amount. Making the Net self-regulated instead of controlled by the government is the goal of eTRUST1 and the Internet Privacy Working Group (IPWG).2 The underlying question that is faced by eTRUST and IPWG is whether they can successfully garner industry support without the heavy threat of government regulation behind them. Her graduate research focused on the emerging use of a new voting paradigm made practical through the use of computers. MAKING IT REAL: How can these two complementary systems succeed? Working Groups eTRUST establishes industry standards and best practices through a series of working groups on each of the relevant topics. The company licensed its database to Yahoo! last summer. Although Webmasters who post the eTRUST logos on their sites will eventually have to pay a "small, graduated" fee to eTRUST, the service right now is free.5 Logo posters will have to pay third-party attestors commercial rates for their validation service; that's between attesting accountants and their logo-posting clients. Raising Awareness Everyone involved with eTRUST stresses that it is a pilot program without final answers. Today, cryptography also is often used to prevent an intruder from substituting a modified message for the original one (to preserve message integrity) and to prevent a sender from falsely denying that he or she sent a message (to support nonrepudiation). Electronic payment systems may be designed as software-only systems that can be used to make payments over computer networks, smart card systems that can be used to purchase goods from vendors who have smart card hardware, or hybrid systems. "No data is kept" is easy. Some groups let only group members query on group-oriented data, so only PHS alumni could find out that other people are PHS alumni, or what year they attended. In addition, because these systems rely on visual icons, individuals must consciously remember to look for these icons at every site they visit and take additional actions to confirm that the icon has not been forged. Membership in the working groups is completely open. How often should logo-posters' claims be spot-checked? Industry disclosure schemes often founder without strong government/public pressure. But in December, in response to perceived pressure, the companies dropped the service. They can also view graphics-filled ads from Juno's advertisers and from Juno itself. While the eTRUST model is applicable to both privacy and security, privacy assurance will be the initial focus of the trustmark system. THE eTRUST MODEL eTRUST's mission is to establish individual and institutional trust and confidence in electronic transactions. eTRUST has engaged The Boston Consultancy Group to assist in this process. There are two kinds of cryptographic systems--secret key and public key. Participants in electronic commerce envision that this marketplace will be enabled by: Millions of consumers, companies and value added services; Consumer and business-to-business oriented online transactions in financial services, health care, manufacturing, retailing and hundreds of other market segments; Common technology platforms for security, payment, directories, EDI, collaboration and other essential services; and A global business community with conducive legal and regulatory structures and standards for business practices. The server could respond by agreeing to honor the individual's preferences, by offering a restricted portion of the site in which the individual's preferences will be honored, or by providing an explanation as to why the individual's preferences cannot be honored or an incentive for the individual to access the site even though it does not honor the stated preferences. [EC 1995] EC Directive on Data Protection (draft), available at privacy/privacy_international/international_laws/ec_data_protection_directive_1995.txt [Flaherty 1989] Flaherty, supra [Froomkin 1996] Froomkin, A. They also provide individuals with the means to choose what data they provide for specific purposes. It remains to be seen whether eTRUST and P3 beat Congress to the punch, and whether the government's activities will hasten adoption of eTRUST and P3 in the marketplace. For example, in an electronic payment transaction the bank need only know that the individual is authorized to withdraw money from a particular account, the identification number of that account, and the sum of money to be withdrawn; the vendor need only know that it has received a valid payment. 2 The Internet Privacy Working Group is separate from eTRUST, but responding to many of the same pressures. In the context of privacy, the first question is whether Alice values her right to privacy more than WonderWidgets values the right to call her at home at 9 pm. And so forth. Ed Marker, D-MA). Several trusted intermediary systems currently in use on the Internet are designed to prevent the release of personal information. Initially, 50 sites have been chosen as participants with the goal of reaching 100 pilot sites by the end of the program. (The user's and the site's choice of auditor or auditing scheme could of course be specified in the label.) For all the same reasons as for eTRUST, IPWG label-posters will also have to devise some provisions for attestation--or ally with eTRUST--if P3 is to have any credibility.7 With such a validation/ enforcement structure in place, P3 could have immense power. In that context, Narrowline is an ideal customer for C&L, because it needs auditing for just about everything. It may be possible to use technology to automate the information practice audit process to some extent. In public key systems, each user has two numeric keys--one public and one private. Its goal is not to ensure universal privacy, but to get users to ask about and Websites to explain their privacy practices. But our principles tend toward maximum personal freedom--that people should decide for themselves how to value their rights. General operating guidelines for sites licensing any of the eTRUST logos are as follows: Disclosure of Information The service must explain and summarize its general information gathering practices. The organization intends to build this public trust and confidence through a system of "trustmarks", or logos, covering issues of concern to end users. Bob Franks, R-NJ), and the Communications Privacy and Consumer Empowerment Act (Rep. ANONYMITY VS. (Of course, individuals who choose not to provide essential data in some situations might be denied services as a consequence.) Traditional means of providing notice and choice generally require individuals to divert their attention away from the task at hand in order to read or listen to lengthy explanations and answer questions. [Russell 1991] Computer Security Basics (O'Reilly & Associates, Inc., Sebastopol, California) (1991). Hall, Channels: Avoiding Unwanted Electronic Mail. Independent third-party attestations from C&L about consumer data practices offer reasonable assurance that the business practices operate as intended. Y.) (1992). Top-ranked barriers to electronic commerce adoption1 are: Lack of security 26.6% Privacy 19.5% Availability of content 11.7% Lack of standards/infrastructure 10.9% Social acceptance 7.0% Multiple other reasons 18.1% The current absence of privacy assurances exposes online users to serious risks of privacy violation. 2 Paul Resnick, Privacy applications of PICS: The Platform for Internet Content Selection. Prepared for the Federal Trade Commission Public Workshop on Consumer Privacy on the Global Information Infrastructure. (Juno 4-5, 1996). The vendor forwards the code to the card issuer with a request for privacy or a request for information. This paper only highlights a few which are relevant to our topic. Labeling allows each person to select the content they see prefers for herself or for her children or pupils. But for now, it's all or nothing. The PICS technology also offers promise in the privacy realm for user empowerment through automated notice and choice.2 Labeling vocabularies might be developed to describe the information practices of organizations that collect data over the Internet. But it is the user's choice, not the system's. These already exist, but their application has been limited, due to user acceptance problems. These technologies can be used to build applications that minimize the need to reveal personal information and empower individuals to control the personal information they reveal and understand how it will be used. The basic rule is that through labeling providers must disclose themselves clearly and honestly. The presence of a third-party auditing firm adds elements of oversight and trust to the eTRUST program. eTRUST's and IPWG's challenge is to raise the public's awareness just enough to make it want eTRUST and P3, but not enough that it puts the issue into the hands of the government. Transaction security disclosure. The Role of Technology in Self-Regulatory Privacy Regimes Lorrie Faith Cranor Public Policy Research AT&T Labs-Research(2)lorrie@research.att.com Individuals frequently reveal personal information in the course of doing business in order to gain benefits such as home delivery of products, customized services, and the ability to buy things on credit. ACCOUNTABILITY Individuals sometimes choose to remain anonymous to safeguard their privacy, for example, when browsing in a department store or purchasing an "adult" magazine. "Browser vendors and online services could offer privacy filters" much as many now offer (mostly optional) content filters. The company is about to roll out its service. Brought To You By, a trading floor for sponsorship of content and events. Firewalls/Authorization Increasing numbers of users and computers are being checked for authorization before being allowed to interact with internal corporate, university, or government systems and obtain information from them. Indeed, medical, credit, and marketing databases appear to be as troublesome as governmental databases. 2 times 4 is 8, and 3 times 4 is 12. Without such action, numerous violations of privacy are likely to occur, damaging public confidence in electronic commerce and potentially precipitating government action. The IPWG's Platform for Privacy Preferences (P3) will be more granular, and will enable a way of representing specific privacy rules in computer-readable form. (That may not be a real issue, but it makes some customers feel more secure.) And people who respond to an advertiser's direct offer, of course, lose their anonymity. Are those third parties bound by eTRUST too? By contrast, a privacy vocabulary is more complex, and needs a grammar for expressing conditional preferences. Hall's implementation of channels requires that individuals ask each of their correspondents to contact them at a different email address, a requirement that may prove inconvenient. However, the number of information practice categories must remain small if the category icons are to remain easily distinguishable. A market is operating, and the private sector can, as in most markets, strive to fill the market requirements. When a customer visits a site sponsored by a Narrowline advertiser, the text and editorial come from the Netcaster, while the banners come from Narrowline and its advertisers. Labeling Practices for Privacy Protection Esther Dyson Edventure Holdings, Inc. When there are mutually acceptable terms for transfer of individual information and conditions on its use, these tools allow the negotiation and information transfer to happen in the background, without consuming the individual's valuable time and attention. Computer technology will not solve all privacy problems. ps AUTHOR'S BIOGRAPHY Lorrie Faith Cranor is a researcher in the Public Policy Research Department at AT&T Labs-Research. 4 Andre Bacard. The initiative was launched in July 1996 by a coalition led by the Electronic Frontier Foundation (EFF) and included the following group of companies involved in the Internet marketplace: Coopers & Lybrand CyberSource Firefly Network InfoOnline KPMG Peat Marwick Narrow Line Organic Online Portland Software Test Drive Corp. Hammers over Our Heads Currently, the government is paying substantial attention to privacy issues on several fronts. Robert Hall, a researcher at AT&T Labs, has developed a system of channelized electronic mail in which individuals set up many email channels and assign a different channel to each of their correspondents.10 Correspondents who have not been assigned a channel can only communicate with the individual on a low-priority public channel. The market works well with defined items, less well with slippery pieces of data that change value as they get combined or change hands. And obviously, eTRUST itself is eager to sign up as many accounting firms as it can. If computer systems or applications require "proof" of identity before allowing use, we will have a much more accountable society. Thus, the most effective notion about information practices is likely to come from the Web sites themselves. Then they need to read further to find out exactly what the vendor is proposing. How much do they want that loan? Elaborates on the execution of the transaction from the user to the actual point of service. In the short run, this will require that eTRUST obtain the financial sponsorship and operational involvement of leading business and government organizations that have vital interests in ensuring online privacy. Thus, the technology can help niche markets in privacy develop. You can't always multiply the number of games played by the same number to get the number of goals scored. The following data shows the number of soccer games you played related to the number of goals you scored: 2.8, 3.12, 4.20, 5.36, 6.50. That's the long-term question: How can you make information available selectively? To be effective, these applications will need user-friendly interfaces. As the user profile grows more mainstream there is an increasing focus on transactions, leading to a fundamental rethinking of how personal and business information is exchanged and used. People might subscribe to junk mail filtering services that maintain databases of junk mail submitted by subscribers and periodically send updates to each subscriber's computer with instructions on how to identify and delete newly discovered junk mail. On the other hand, usability will suffer--imagine having to authenticate yourself to a pay phone or to a rental car! Accountability should not be required. This grass-roots electronic movement flooded the mailbox of Lotus' chief executive officer with 30,000 electronic complaints, and could be characterized as the first "electronic sit-in." More recently, in 1996, Lexis-Nexis offered a service which provided its 740,000 subscribers with 300 million names, previous and current addresses, maiden and assumed names, birth date, and telephone number. Likewise, your concerns for security may depend on the kind of interaction you are having: Are you simply revealing your name, or are you transferring cash, or revealing deep dark secrets? eTRUST is a brand name; the premium value it indicates--its secret ingredient or unique selling proposition--is validation of the promises behind the Trustmarks. eTRUST Since work started last year, the eTRUST partnership has been enlisting sponsors/partners who will help to cover the start-up costs of the free-to-use pilot program. The Lotus MarketPlace: Households database was going to make names, addresses, demographic and prior-purchase behavior data for 120 million U.S. consumers available on a CD-ROM in 1991. As a private company, for now, Juno can afford to serve everyone--founder David Shaw's quiet little contribution to the public welfare. The opportunity to automate the notice and choice process is a major advantage of the Internet over other media for commercial interaction. For the larger firms it's not merely a question of brand recognition and size. It would be as if cars would only start when driven by "authorized" drivers; mere keys would not work. Recent privacy-related scandals have helped turn trust into a key issue for consumers in particular. TS Communications World Pages This group developed the initial concept for eTRUST along with developing the first set of guidelines for privacy disclosure of information on a Web site. Now you try: Identify if the following data represents a proportional relationship: 3:9, 5:15, 6:24, 8:32? You can identify if a relationship is proportional. In the United States, information about individuals' video purchases is protected--the result of one unfortunate experience by one legislator that resulted in the law. The Trustmarks call users' attention to the responsible for the regulation of the Nasdaq stock market and the over the counter securities market. It is chaired by the author. But as with most cash transactions, the bank cannot determine which individual gave the note to the vendor. Other vocabularies might also employ multiple dimensions, for example, one dimension for practices pertaining to each type of information a site collects (demographic information, contact information, transactional data, etc.). AUTOMATED PRIVACY AUDITS While the approaches outlined here facilitate the seamless exchange of information about data collectors' information practices and individuals' privacy preferences, they do not ensure that data collectors will report their information practices accurately. eTRUST will work not by giving people new rights, but by encouraging people to exercise their existing rights and market power and by providing a model of how the market can work best by informing its participants. 7 eTRUST Trustmarks are a logo for people to see on a Website; P3 labels are executable code for a browser or other software tool to read and communicate with. Blind signatures can be used in electronic payment systems to allow banks to sign and distribute digital notes without keeping a record of which notes an individual has been given. The combination of eTRUST's approach to labeling and certification, and the IPWG's approach to representation and automatic negotiation, could end up as a powerful advance in Net civilization. A self-regulatory approach to protecting privacy on the Net is worthwhile both in itself and as a way to avoid government regulation. Web negotiation protocols are currently under development by W3C and other organizations. If data is deemed to be "owned" by individuals, and royalties paid, then we can use encryption technology to digitally sign individual pieces of data, effectively placing taggants with the data. Internet and computer users expect choices: from the minute they get their computer, they are asked whether they want a plain background or one of a number of screen-savers, what their printer is like, and a number of other things, all designed to configure the system to the preferences of the user. SUMMARY The eTRUST model provides a mechanism for industry self-regulation that can provide public assurance of privacy. SYSTEMS FOR LABELING CONSUMER PRIVACY PRACTICES Fortunately, there are systems in the works not for privacy regulation, but for privacy disclosure and the labeling of data-management practices. The trick is to persuade merchants of all sizes that privacy is a compelling and vital marketing issue. Pseudonyms also allow a site to maintain information about the state of an individual's interactions with that site, such as the contents of an individual's virtual shopping basket. This approach allows attention to be focused on the information practices of a small number of intermediaries rather than on all parties that might engage in transactions. Would users trust such an automated system? Where in the past business and government have obviously had a part in making the rules, now individual members of the online community are raising serious questions and refusing to play if these are not answered satisfactorily. She can send back a purchase order with ease, he notes, and her credit card never goes over the Internet. Is this enough to force the issue? Alternatively, an individual's email software might sort correspondence into channels based on the name of the sender. "Unlike a Website, we're pretty simple to audit," notes Ardaí. [Resnick 1996] Resnick, P. Narrowline sells access to particular demographics through sites, but doesn't pass on to the sponsors any detailed information about the visitors/members of the site. The bank need not know what the individual is doing with the withdrawn money, and the vendor need not know the individual's name or bank account number (in contrast, these pieces of information must be transferred, for example, when individuals purchase goods with checks). L. 3 The issue of who owns rights (and other assets), and who can afford to keep and exercise them rather than sell or exchange them, is one of social justice, which is not our concern here. It is important for merchants and other major players in Internet commerce to put in place some system for addressing this customer concern both to further the development of online transactions and to obviate potential government regulatory intrusion in the electronic marketplace. research.att.com/~lorrie/pubs/nicss/nicss.html 9 Cham, supra note 7 10 Robert J. UL's primary mission is to help get safer products to market by offering manufacturers a array of conformity assessment and product certification services. The users' identity is not revealed to the advertisers, who simply get a report such as "5482 men between 18 and 49 who have expressed interest in new car saw your ad last month; please pay \$2,741 within 30 days." Juno may also tell them, for example, that 25 percent of the people who clicked on their ad were female. Otherwise, companies are simply too busy to adopt them and customers don't factor the information disclosed into their buying habits. Standards vary around the world, and each government will have its own domestic privacy standards. For now, however, consumers don't necessarily know Narrowline either, but its use of the eTRUST Trustmarks means that the eTRUST brand will be applied to advertising from sponsors who don't sign up with eTRUST specifically. The potential benefits to the US and world economies in terms of growth and job creation are quite large. A user has a right to know if the transaction into which they are entering will be protected during its execution and storage. Thus one could always trace the data back to its source. Juno's financials and other numbers, including claims to advertisers, are audited by Coopers & Lybrand. The user empowerment tools described above depend on cooperation between individuals and information gathering organizations. eTRUST is currently developing a three-tiered series of privacy trustmarks which characterize how personal information will be used: No Exchange-for-anonymous usage of a site 1-to-1 Exchange-for information that will be used interactively between the user and the site, but not released to third parties 3rd Party Exchange-for information that may be disclosed to third parties. Constitution. It recognizes the possibility of "privacy royalties" and describes a few of the technological mechanisms available to implement these controls. A P3 program at the Website could describe its own practices and could also read a user's self-description. For example, if a Web site does not have practices consistent with an individual's preferences, the browser might contact the site and ask how the individual might be accommodated. On the Internet, individuals typically wander from site to site without such interruptions. Who can play the role of hammer for eTRUST and IPWG, or for privacy self-regulation generally? Informed consumers can negotiate better deals individually, and shift the market towards more customer-friendly behavior in general. Although the service is free, it's not quite "the people's e-mail." It still skews Internet-wards, says Juno president Charles Ardaí: mostly male and higher income. Some would consider this a violation of federal law, or at least of ethics. However, as with traditional credit cards, the card issuer has a complete record of the individual's credit card transactions and must be trusted to safeguard this information. These include "flaming," "mailbombing," warnings from their ISPs, and termination of accounts (all of which Mr. Wallace has suffered). There are currently five working groups: privacy, transaction security, accredited authentication, eTRUST business model (including pricing and audit issues), and marketing/public relations. Yes, we should. This information comes from individuals and from the groups themselves; they in turn can specify what information they give should be made available, and to whom. Indeed, should we? However, there are also several bills pending in congress: The Consumer Internet Privacy Protection Act of 1997 (Rep. Development of "vertical" offerings (e.g. focusing on children or medical information). But these systems cannot help her transfer funds to the vendor from her bank account without revealing personal information to the vendor. Individual usage and transaction data may be used for direct customer response only. Some people object in principle to the concept of privacy as an assignable right--one that can be sold or bargained away. Participants in the pilot, with various kinds of involvement, include InfoSeek, WorldPages, Firefly, EU.net, Four11, Quarterdeck, CMG Direct Interactive, InterMind, Narrowline, Portland Software, TestDrive, Britnet, Perot Systems, USWeb, Switchboard, the Boston Consulting Group, and a variety of other organizations, commercial and otherwise. Automated transfer of this information would be more convenient for users than typing the information each time they visit a site, and users could set up their browsers to ensure transfers only to Web sites that have certain information practices. Anonymizing intermediaries and pseudonyms are insufficient for some types of transactions. That works only when one person's selection of rules doesn't impinge on another's. But a Website may instead offer a number of options, and customers can negotiate--perhaps paying in anonymous e-cash to see something that would be free, or providing demographic information in exchange for a discount or customized service. eTRUST will put in place an enforcement process to ensure that sites displaying the trustmarks are in compliance. It utilizes an approach that combines long-term sustainability through industry financial support with consumer credibility through a process of independent assessment and monitoring of business practices. In addition, eTRUST may conduct subsequent audits of the site at any time during the license period. ENDNOTES 1 Arthur D. 7 David Chum, Achieving Electronic Privacy, Scientific American, 266(8):96-101, (August 1992). Anonymous Remailer FAQ (November,1996). Brought to You by has the granularity of a classified-ad market where what Narrowline calls "Netcasters" (content/community providers) and sponsors (advertisers) can find one another, based on the audiences they're seeking or can deliver. SEAMLESS INFORMATION EXCHANGE Notice and choice are among the most important principles of fair information practice. The sponsors get demographics they can trust, but they don't have to go through the trouble of an eTRUST audit because they never see the data that only Narrowline collects. Today, many individuals become aware of the extent to which their personal information is bought and sold when they start receiving unwanted solicitations over the telephone or in the postal mail. Display of Names and Contacts The service will not display or make available personally identifiable name or contact information without the consent of the user, unless the information is publicly available. Under what conditions? As in the physical world, however, these tools do not guarantee that mutually acceptable terms will always be found: depending on market conditions, individuals may or may not find privacy-friendly choices available. It provides a barrier with assurances to both sides: That their identity is safe to customers, and that the demographics are reliable to advertisers. The bank can verify its signature on the note to determine whether it is legitimate, and it can record the serial number and make sure notes with the same serial number are not spent multiple times. A third class of users are the firms licensed by eTRUST who validate the logo-posters' claims, usually accounting firms; we call them "third-party attestors." 6 PICS stands for Platform for Internet Content Selection and is a standard protocol for labeling Internet content. Cytron, Sensus: A Security-Conscious Electronic Polling System for the Internet, Proceedings of the Hawaii International Conference on System Sciences, (Forthcoming January 7-10, 1997), Wailea, Hawaii, USA. The next time the user visits that site, the site can retrieve any cookies that it previously stored. Its planned "product" is a technical standard called P3, for Platform for Privacy Preferences. A longer paper treating this topic and others ("Using Computers to Balance Accountability and Anonymity in Self-regulatory Privacy Regimes") with a more extensive reference list is available at . Further work is needed to develop techniques for automating the information practice auditing process. Does she need separate contracts with all the people who might possibly telephone her?

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