

[espc-announce] FW: FYI: New Mobile App Privacy Best Practices Report From California's Attorney General

1 Attachment, 3 KB

All –

Earlier today, the California's Attorney General released [Privacy on the Go](#), a report that recommends best practices for app developers and other participants in the mobile ecosystem. The Report primarily focuses on developers, as well as on third-party ad networks—suggesting that such third parties create privacy policies of their own explaining how they use and collect data. Many of the recommendations are *not* required by existing law, but—echoing the FTC's emphasis on "privacy by design"—they are "intended to encourage all players in the mobile marketplace to consider privacy implications at the outset of the design process."

Key recommendations for app developers include:

1. Don't collect more personally identifiable data than necessary for the app's basic functionality and operations, don't store the data longer than necessary, and use security safeguards for stored data.
 - a. Be transparent about uses of data.
 - i. Have a privacy policy that is easy to find and easy to understand and make it available before the app is downloaded.
 - ii. In the policy, describe in detail how you will collect, use, share, disclose, and retain personally identifiable data.
 - b. Don't 'surprise' users with data collection practices that are not related to the app's basic functionality, or that involve collecting sensitive information.
 - i. If you do undertake these practices, provide enhanced notice or short privacy statements along with privacy controls that enable user choice.
2. Consider the data collection processes of any third party software used in the app.
3. Give users access to the personal information that the app collects and retains from them.
4. Comply with general laws and with the privacy policies you provide.
 - a. Train your employees in privacy obligations and in your policies and practices

Key recommendations for advertising networks include:

1. Create privacy policies using the same guidelines provided to app developers, with particular emphasis on enhanced notice for ads delivered outside the context of the app or when accessing personal information.
 - a. Provide the privacy policy to app developers that will enable the delivery of targeted ads through your network.
2. Use app-specific and/or temporary device identifiers, as opposed to persistent device-specific identifiers.

For app platform providers, the report essentially recommends that they facilitate app users' ability to learn about and understand the privacy policies of individual applications that the users download from the platforms. The report also includes some minor recommendations for operating system developers and mobile carriers.

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Best regards,

Reed

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