In my most recent two columns, I’ve been discussing privacy policies. Today I want to look at some of the issues that can occur when you work with other organizations whose policies may differ from yours.

One of the sites I investigated where interested parties could fill in a form to request information included some information on opting out of receiving junk e-mail and other unsolicited marketing materials from itself, its business partners, and anyone to whom it chose to sell enquirers’ names.

The Privacy Policy included the following information:

- **E-mail Opt-out Options**: Each marketing e-mail We send includes instructions and an opt-out link.

- **Refusing Cookies**: Subject to the section below pertaining to cookies and web bugs, you have the ability to prohibit being served an advertisement based on cookie technology. We utilize reputable third-party vendors to serve advertisements. If however, you are not comfortable with cookies, you can adjust the settings within your browser to further prohibit being served a cookie. Please see the browser’s instructions to perform this task.

- **The National Advertising Initiative (NAI)** has developed an opt-out tool with the express purpose of allowing consumers to "opt-out" of the targeted advertising delivered by its member networks. You can visit the NAI opt-out page and opt-out of this cookie tracking. Please visit: [http://www.networkadvertising.org/optout_nonppii.asp](http://www.networkadvertising.org/optout_nonppii.asp).

- **Other Options**: If you would like to opt-out of Our promotional marketing, and would like to contact Us, please send Us an e-mail at privacy@<suppressed>.com

Most people in the security field with whom I have discussed the issue argue strongly against opting-out as an acceptable form of control over the abuse of personally-identifiable information. The European Coalition Against Unsolicited Commercial Email (EuroCAUCE) <[http://www.euro.cauce.org/en/](http://www.euro.cauce.org/en/) > has a succinct explanation of the arguments< [http://www.euro.cauce.org/en/optinvsoptout.html](http://www.euro.cauce.org/en/optinvsoptout.html) >; here is my summary of the issues:

- Opt-out schemes cannot cope with the sheer scale of spamming. Spreading e-mail addresses from one spammer to another inevitably outraces attempts to react to each new source after the fact.

- It is impossible to ensure that permanent do-not-spam lists are consulted by spammers.
• There is no mechanism for supervision of compliance efforts.

• There are no enforcement mechanisms to prevent abuse.

In my view, opt-out schemes for protecting privacy are usually legitimate attempts to balance marketing departments’ needs for productivity with privacy advocates’ preference for better protection. However, for some unscrupulous marketers, opt-out policies may mask deliberate programs to capture user information that can be used or sold at a profit before the users can stop the abuse. Your organization should carefully examine the advantages and disadvantages of opt-out schemes before signing contracts with firms that use such methods.

Editor Jeff Caruso pointed out to me that Network World itself uses opt-out provisions in its own privacy policy. <http://www.networkworld.com/tos.html> I want to make it clear that I do _not_ think that all users of opt-out methods are Bad People or that no one should ever use the services of organizations that choose to include opt-out in their terms of service. Personally, I have had no problem at all with Network World’s services. Nonetheless, with all due respect to my publisher, my personal preference is to opt out of using opting out.

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