
Global Services Specification V1.0

Appendix C: Global Privacy Policy

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This document is an appendix to the Global Services Specification (GSS). Please see <http://gss.xdi.org> for other notices and links to the GSS and all other appendices.

Comments should be posted to the appropriate page of the XDI.org wiki at <http://wiki.xdi.org>, or submitted to the appropriate mailing list as described on <http://www.xdi.org/mailling-lists.html>.

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XDI.org Privacy Statement

1. Introduction

XDI.org is an international public trust organization that exists for the benefit of the Internet community. XDI.org is devoted to the work of creating an environment of trust for Internet users, and that means we are striving to enhance the privacy and security techniques available to you as an Internet user.

In keeping with its purpose and principles, XDI.org takes your privacy interests very seriously.

- We actively protect the privacy of visitors to the XDI.org website, participants in discussion lists, email correspondents, and others who interact directly with XDI.org.
- We also protect the privacy of information concerning i-name and i-number registrants and others when we have access to it, however briefly, in the course of carrying out XDI.org's governance and development responsibilities.
- Finally, through a chain of agreements beginning with the [XDI.org Intellectual Property Rights \("IPR"\) Agreement](#) and the [XDI.org Global Service Provider \("GSP"\) Agreement](#), we seek to ensure that I-Brokers and other XDI.org Agents, along with their subcontractors or licensees, do the following:
 - communicate their own privacy practices clearly and conspicuously and
 - implement broadly accepted ["Fair Information Practices"](#) in handling personal information.

We want to make sure that you are informed concerning what personal information is collected about you, who uses it and for what purposes, what choices you have concerning communications with you and data sharing with others, how your personal information is secured, how you can access and update or correct the information about you, and how you can maintain the privacy of your registration(s) in the global i-name and i-number registries operated in the public interest by XDI.org.

Please note that while we repeatedly refer in this Privacy Statement to privacy in the sense of protecting the confidentiality of information relating to individual persons ("Personal Information"), we also take similar steps to protect the confidentiality of information about corporations and other organizations that register for global i-names or i-numbers or otherwise participate in the XDI.org community.

As the XDI.org community and technology evolve, we will strive to update this Privacy Statement, as published on our principal website, www.xdi.org, and also at the XRI @xdi.org (<http://xri.net/@xdi.org>).

2. Notice Regarding Children

Our websites and email discussion lists are not designed for children, and we do not monitor postings or communications among participants in discussion groups for content that would be inappropriate for minors. We do not encourage the registration of i-names and i-numbers by minors without the permission and participation of a parent or legal guardian, established to the satisfaction of the relevant I-Broker. We will not knowingly communicate with a child under the age of 13 without parental permission. Any questions concerning this policy should be directed to privacy@xdi.org.

3. Fair Information Practices

XDI.org models its treatment of personal information on internationally accepted principles of “Fair Information Practices.” XDI.org requires I-Brokers, other XDI.org Agents, and others with whom we contract to apply the XDI.org statement of Fair Information Practices detailed below in developing their own specific policies and procedures for handling Personal Information.

Sources: The Fair Information Practices adopted by XDI.org are derived from common principles found in international privacy conventions and guidelines as well as in national privacy laws and recommendations, prominently including the following:

- OECD Guidelines on the Protection of Privacy and Transborder Flows of Personal Data (1980)
(http://www.oecd.org/document/18/0,2340,en_2649_34255_1815186_119820_1_1_1,00.html)
- Council of Europe Convention No. 108 for the Protection of Individuals with regard to Automatic Processing of Personal Data (1981)
(<http://conventions.coe.int/Treaty/EN/Treaties/Html/108.htm>)
- United Nations Guidelines Concerning Computerized Personal Data Files (1990)
(http://europa.eu.int/comm/internal_market/privacy/instruments/un_en.htm)
- European Union “Data Protection Directive,” Directive 95/46/EC (1995)
(http://europa.eu.int/comm/internal_market/privacy/law_en.htm) (the basis for national laws in the European Union, the European Economic Area, and in many jurisdictions outside the EU and EEA)
- APEC Privacy Framework (2005) (guidelines for privacy laws and practices adopted by the 21 members of the intergovernmental Asia-Pacific Economic Cooperation group)
- US Federal Trade Commission “Fair Information Practice Principles” (1998)
(<http://www.ftc.gov/reports/privacy3/fairinfo.htm>)
- US-EU Safe Harbor Privacy Principles (2000)
(<http://www.export.gov/safeharbor/SHPRINCIPLESFINAL.htm>)
- Canadian Standards Association Model Code for the Protection of Personal Information (CAN/CSA-Q830-96), incorporated as Schedule 1 (Section 5) of the Canadian federal Personal Information Privacy and Electronic Documents Act

- (“PIPEDA”) (2000) and in provincial and territorial privacy legislation (http://www.privcom.gc.ca/legislation/02_06_01_01_e.asp)
- Australian National Privacy Principles, found in the Privacy Amendment (Private Sector) Act 2000 (<http://www.privacy.gov.au/publications/npps01.html>)
 - Japanese Personal Information Protection Act (2003) (unofficial English translation available at <http://www.privacyexchange.org/japan/japanindex.html>)
 - Principles of confidentiality and security are also found in legislation concerning privacy in the specific context of the transmission and storage of electronic communications, such as the US Electronic Communications Privacy Act of 1986, as amended (<http://cio.doe.gov/Documents/ECPA.HTM>), and the 2002 EU Directive on Privacy and Electronic Communications, Directive 2002/58/EC (http://europa.eu.int/eur-lex/pri/en/oj/dat/2002/l_201/l_20120020731en00370047.pdf)

XDI.org Fair Information Practices. The various conventions, laws, and guidelines around the world dealing with Fair Information Practices are very similar in principle and intent, even though they differ somewhat in details and terminology. The common principles adopted by XDI.org are these:

- *Purpose and collection limitation:* Personal information should be collected by fair and lawful means, preferably with the knowledge of the individual, and it should be used and disclosed only for legitimate, announced purposes.
- *Data quality and accuracy:* The personal information collected should be relevant, complete, and not excessive for the intended purpose. The information should come from reliable sources. The information should be kept as accurate and up-to-date as needed for the intended purposes, and it should be retained no longer than needed for those purposes.
- *Notice and awareness:* Individuals normally have a right to know when personal information about them is being collected, stored, used, or disclosed to others. They should be told what kinds of information are collected, who has access to it, how it will be used, how it will be protected, and what options they have with regard to its collection and use.
- *Choice and consent:* Individuals should be given choices, wherever feasible, as to what personal information is collected and how it is used.
- *Access and objection:* Individuals should be given a reasonable opportunity (a) to review the information that has been collected about them, (b) to challenge its accuracy or completeness, and (c) to object to its further processing beyond what is required to provide the requested service and satisfy legal or legitimate business requirements.
- *Security:* The personal information should be protected at all times by appropriate technical and organizational security safeguards to prevent loss or misuse, destruction or alteration of the data, or unauthorized access or disclosure.
- *Accountability, enforcement, and recourse:* Organizations that handle personal information should appoint responsible persons to develop privacy and security

policies, train relevant staff and contractors, and take appropriate steps to ensure that their privacy and security policies are effective and enforced. They should provide contact points for questions and complaints by individuals and ensure that there is some practical form of recourse and redress for persons injured by privacy lapses or abuses.

4. XDI.org Practices

XDI.org's specific privacy practices, described in the following sections, are designed to take account of the principles of Fair Information Practices listed above. We encourage your questions and comments so that we can ensure that these privacy practices are as comprehensive and effective as possible.

5. Websites

We use log files, as most website servers do, to record certain technical information about visits to our website, including the IP address and the DNS name of the access provider (such as your Internet Service Provider), the type of browser used, referring and exit pages, platform type (where available), a date and time stamp, and possibly the number and sequence of pages visited. Unless your IP address or associated DNS name identify you specifically, none of this information reveals who you are, and we do not link it to other data in an effort to discover the identity of a site visitor. XDI.org staff and consultants use this information solely to administer the site, analyze trends, and track the use of the site in the aggregate so that we can make improvements to better meet user needs. Any log data that we publish, such as the total number of hits or users in a given period, is disclosed only in an aggregate form that does not reveal personally identifiable information. XDI.org deletes its log files monthly.

The XDI.org main Website does not use HTTP "cookies" [see http://wikipedia.org/wiki/HTTP_cookie]. The XDI.org wiki Website uses cookies only for the duration of a user session, to maintain the integrity of the session as the visitor navigates the site, conducts searches, and posts comments or documents.

XDI.org may record information about queries submitted to XDI.org website search facilities to better understand how visitors use the website's search features. As with other forms of Web access, this information generally cannot be associated with any particular user. In any case, search query information is not disclosed to anyone outside the relevant XDI.org staff, except in an aggregate or anonymized form.

Please remember that any comments or documents that you post on an XDI.org website, including the wiki website, should be considered public and may ultimately be viewed by site visitors and also accessed by spiders, web crawlers, or search engines. Use care in posting comments and documents, because any personal information that you post on a website is likely to become public information!

6. External Links

XDI.org websites may contain links to websites operated by other parties. XDI.org does not control those external websites and cannot be responsible for their privacy practices.

7. Email

Please use discretion in sending email messages to XDI.org staff or role accounts (such as “postmaster”). XDI.org will endeavor to store, use, and disclose email only as needed to answer your requests and perform our oversight, administrative, standards-development, and educational functions. But electronic mail is not a reliably secure medium of communication, and XDI.org cannot guarantee the confidentiality of email messages in transit or stored on the servers of ISPs, employers, or others to whom emails may be manually or automatically routed and who are outside the direct control of XDI.org. If you feel a message is particularly sensitive, you might consider sending it from a private email account or device, addressing only known individuals, and perhaps protecting the contents by using a strong public key encryption technology such as PGP. Here is a [link](#) to XDI.org's PGP Key.

To receive an XDI.org publication or subscribe to an XDI.org email list, you must provide your email address -- without it, you won't receive anything from us. Although XDI.org does not require subscribers to provide their names, your email program or Internet Service Provider may automatically include your name with the email containing your subscription request. If so, XDI.org will record your name with your email address, only for the purpose of ensuring that you are not confused with someone else when we have to manually sort out subscription problems. We will delete your name from the email list database at your request, and we will delete your email address at any time from the email list database if you follow the posted instructions for “unsubscribing” (please allow a few days for an unsubscribe request to take effect).

XDI.org holds the names and email addresses of correspondents and email list subscribers in the strictest confidence and will not disclose personal information about email senders or email list subscribers without their permission, unless required by law. XDI.org email servers and archives, email subscription lists, and email subscriber databases are accessed by only a few XDI.org staff members, for the purpose of maintaining them, and we take every reasonable precaution to protect them against unauthorized access, theft, tampering, and misuse (electronic or otherwise).

The XDI.org email lists use “cookies” only if you choose to change the default subscriber options for email list participation, and then only to ensure that those options are given effect.

Aggregate information about XDI.org email subscription lists (such as the total number of subscribers) may be published to promote XDI.org, but XDI.org will not publish identifying information about individual subscribers without their permission.

8. Discussion Lists & Archives

XDI.org maintains discussion lists with Web-based archives. Although XDI.org keeps email list subscriber information in the strictest confidence, as discussed above, participating in discussion lists may reveal some information about you to all subscribers. This will include your email address and name (if the name is automatically displayed with your emails or revealed by the email address itself), as well as the content of your email message and email signature (if any). (You could, of course, participate using an email address and server that do not reveal your name.)

Users should consider any discussion list a public forum and exercise caution in disclosing any personal information. You are not likely to know all the other subscribers to an email discussion list, and subscribers may disclose messages to others. And although XDI.org takes steps to prevent automated programs from harvesting email addresses and other information, third parties may still find a way to access email addresses or messages sent to an email discussion list.

9. Surveys

XDI.org may ask website users or email list subscribers to participate in surveys. In all cases, participation will be voluntary. If a survey asks for personal information, answering those questions will be optional. Survey responses will be seen only by XDI.org personnel and any contractors or consultants assisting XDI.org in conducting the survey. Survey results will be made public only in the aggregate, without reference to individuals, unless an individual gives us permission to quote and attribute his or her response.

10. I-Names and I-Numbers

A key purpose of XRI and XDI technology is to allow i-name or i-number registrants to control the sharing of their contact details and other Personal Information with others. XDI.org and OASIS have developed standards and specifications to enable this privacy-enhancing technology, but it is implemented through I-Brokers, other XDI.org Agents, or other XRI and XDI service providers that have their own commercial relations with i-name and i-number registrants.

XDI.org is the community governance authority for a set of global i-name and i-number registries offered to the public as XDI.org Global Services. These global public registries are operated by contractors to XDI.org called Global Service Providers. Neither XDI.org nor Global Service Providers collect registration information directly from global i-name or i-number registrants. These registrations are performed by I-Brokers accredited by a Global Service Provider to accreditation standards specified in the [Global Services Specifications](#) (GSS) by XDI.org.

When you register a global i-name or i-number with an accredited I-Broker, you will be asked to provide the information specified in the GSS that is necessary to create a secure registration record in the global public registry, including a pointer to your current I-Broker and an account authentication credential such as a password. You may also be asked by your I-Broker to provide certain information that will not be listed in the global public registry but will be stored only by your I-Broker (and a portion by a Contact Data Custodian not affiliated with your I-Broker – see section 14), such as your name and (where applicable) affiliation, your contact and payment details, and possibly other relevant information that would allow the I-Broker to confirm your identity when you make any requests to change, transfer, or terminate your registration or other services from your I-Broker.

All XDI.org Agents, including Global Service Providers (initially, [Cordance Corporation](#)), I-Brokers, Contact Agents, and Contact Data Custodians are required to maintain privacy policies that apply the principles of Fair Information Practices (section 3). Global Service Providers are also obliged to require the same of I-Brokers whom they accredit and others with whom they subcontract to provide XDI Global Services. [see the *Global Services Specifications, Appendix I: I-Broker Agreement* at <http://gss.xdi.org>]. As a consequence, an I-Broker or its contractor should also publish or furnish you with its own privacy statement. This privacy statement must always be available at the following XRI: `http://xri.net/[@your.i-broker]/(+privacy.policy)`, where “[@your.i-broker]” is the registered i-name of your i-broker. We encourage you to review that privacy statement before registering with a particular I-Broker, since their roles, practices, and options may differ. You will need to communicate directly with the I-Broker, rather than with XDI.org, to indicate your preferences with respect to any optional data collection, data sharing, or contacts.

11. Registrant Information held by XDI.org.

XDI.org obtains, uses, and stores Personal Information about registrants only to the extent necessary for its governance and development purposes, such as authenticating change requests, correcting technical problems, resolving disputes, and complying with applicable laws. For these purposes, XDI.org and its contracted Global Service Providers use only the limited Personal Information necessary for a secure registration of an i-name or i-number in the global public registry and the associated resolution data, such as the XRI and the Uniform Resource Identifier (URI) of the host I-Broker (where applicable). In connection with transfers and disputes, XDI.org may from time to time request additional identifying information from I-Brokers, Global Service Providers, Contact Agents, or Contact Data Custodians, and the arbitrators or parties to a dispute may provide XDI.org with information relevant to dispute resolution proceedings per the XDI.org GRS Dispute Resolution Policy (GDRP).

XDI.org employs technical and organizational safeguards, including password access controls and physical security, to protect Personal Information as long as it is in our possession, and we retain Personal Information only as long as needed for our governance and development purposes.

Unless you give us permission, XDI.org will not share your Personal Information with third parties except as necessary to fulfill its governance and development responsibilities. The categories of third parties that might receive Personal Information from XDI.org for these purposes include XDI.org's contractors and consultants, the affected I-Brokers or Global Service Providers, law enforcement agencies, arbitrators, and parties to litigation.

XDI.org will not use, sell, rent, or otherwise disclose Personal Information for marketing purposes without your permission.

12. Legal Requests for Personal Information

Please be advised that, as in the case of domain name registrars and Internet Service Providers, XDI.org, an I-Broker, a Global Service Provider, a Contact Agent, or a Contact Data Custodian could be legally compelled in some circumstances to disclose Personal Information that they may hold, such as the identity of an i-name registrant, to law enforcement authorities or to parties in civil litigation.

13. Contacting XDI.org about Personal Information

Please go to your I-Broker's website to request changes, transfers, or terminations with respect to your i-name and i-number registrations in the global public registries. To review, correct, or ask for the deletion of any Personal Information that XDI.org itself may have, please email privacy@xdi.org, or send a letter to XDI.org, 4855 Wikiup Bridgeway, Santa Rosa, CA 95404. We may ask for additional information to establish who you are and to facilitate our search for relevant data, which we will do to the extent it is indexed or reasonably searchable by i-name or i-number.

Please send an email to urgent@xdi.org to report any privacy policy concerns or suspected violations. We will correct any errors on our part, notify third parties that obtained relevant data from us concerning any necessary corrections or deletions, and try to reach a reasonable accommodation with you with respect to any unusual privacy concerns you might have.

14. Contact Data

When you register an i-name, your I-Broker will ask you for "Contact Data" -- your name, telephone number(s), physical address, and email address(es). The full set of this information, called "Full Contact Data", will be used to contact you in the event that there is a dispute relating to your use of the i-name, such as an alleged trademark or copyright infringement. You may choose to rely solely on email notifications by furnishing only "Reduced Contact Data", which includes only an email address. Of course, by doing so you assume the risk that you may not receive timely information about a legal claim if attempts to contact you by email fail for any reason. You may

always update your Contact Data through your I-Broker, and you may always make the election to switch between providing Full Contact Data and Reduced Contact Data.

Your I-Broker will designate an unaffiliated Contact Agent accredited by XDI.org to receive notification of (a) any dispute under the XDI.org GRS Dispute Resolution Policy (GDRP) or (b) any other legal disputes concerning your use of an i-name. Your I-Broker will also provide your Contact Data to an unaffiliated Contact Data Custodian accredited by XDI.org (the Contact Agent may also serve as the Contact Data Custodian). If the Contact Agent receives notice of a GDRP dispute or other legal claim concerning your i-name, it will attempt to deliver that notice to you using the Contact Data your I-Broker has provided to the Contact Data Custodian.

Contact Agents and Contact Data Custodians must be accredited by XDI.org. Their accreditation depends on their compliance with XDI.org specifications and codes of conduct, including the Fair Information Practices described above and security, privacy, survivability, and accountability policies and procedures necessary meet the data protection requirements of the XDI.org Global Services Specification (GSS) maintained at <http://gss.xdi.org>. Contact Agents and Contact Data Custodians are both required by the GSS to publish a "Policy Page" including their privacy and other data protection policies. This Policy Page must always be available at the following XRI:

[http://xri.net/\[@agent\]/\(+policy.page\)](http://xri.net/[@agent]/(+policy.page)), where "[@agent]" is the registered i-name of your Contact Agent.

Your Contact Data (whether Full Contact Data or Reduced Contact Data) is always held confidentially and is not publicly accessible or searchable. Only your i-name, your I-Broker, and your appointed Contact Agent are publicly searchable information.

15. Jurisdiction

In the event of litigation over alleged privacy breaches by XDI.org, we submit to personal jurisdiction in the courts of general jurisdiction in our state of incorporation (the State of Utah, USA) and in the Commonwealth of Virginia, USA.

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