I. Introduction and Principles Guiding App Transparency

The application developers industry, in coordination with leading privacy, civil liberties and consumer advocates, offers these discussion draft transparency screens (hereinafter "Mobile App VTS" or "VTS") for consideration by all stakeholders in the mobile app ecosystem. These short form notices, if adopted by mobile app developers, are intended to enhance transparency about apps' data collection and third party sharing.

This Mobile App VTS document builds on the best practices implemented by other industries and incorporates guidance from consumer experts, leading app developers and mobile User Interface designers to benefit consumers. Voluntarily providing screens to inform consumers about an app's data collection and third party data sharing, if any, will help consumers choose which apps they wish to use and how they use them. Consistently displaying this information will help consumers compare and contrast the data practices of apps. This transparency will enhance consumer trust. Further, a voluntary model can be the foundation for continued innovation while ensuring transparency for consumers.

Apps are guided by the following principles in voluntarily implementing transparency-enhancing screens:
- App developers are committed to earning and keeping the trust of consumers as this is central to the growth and enhancement of the apps industry.
- Trust is earned through clear explanations of what each app does and through actions that are consistent with those explanations.
- Consumers should expect clear, succinct explanations of an app's data collection and third party data sharing, if any, to carry out the functions promised by the app to consumers.
- Consumers rely on apps and hold a widely varying spectrum of attitudes towards their sharing of data with apps. Consumers' sharing will vary with context and time, and apps should work to effectuate those choices. Simultaneously, regulators, legislators and privacy and consumer advocates recognize some consumers' choice to share data with apps in exchange for a wide variety of tools, content, entertainment.
- Apps will evolve over time to offer fixes, enhancements, and changes to the original functionality. Apps may need to offer new functionality and/or they may need to adapt their business models. When apps' data collection and third party data sharing evolve in material ways they must promptly and prominently update their explanations of their data collection and third party data sharing to reflect this evolution. Continued work will need to be done to help integrate the full range of fair information practices with effective methods of transparency for innovative data uses.
- Short form notices that allow participating apps to only display a subset of information must substantially enhance app transparency and consumer understanding. These notices must be designed to empower consumers to

make informed choices about app usage that are consistent with each consumer's desires.

- Finally, while transparency is essential to building consumer trust, app developers understand that their implementation of these VTS is just one aspect of satisfying consumer expectations and meeting well-understood privacy principles. App developers commit to leading their industry to develop common practices and tools to realize these principles including access to personal information, control over storing information and sharing it with 3rd parties. Developers believe these changes are crucial to achieving enhanced consumer trust and creating a framework for innovation.

II. Short Form Notices

Participating application developers and publishers that voluntarily implement the Mobile App VTS shall detail:

(i)   data collected from consumers; and,
(ii)   third party data sharing, if any.

These practices shall be outlined in "short form notices" that shall convey information to app consumers in a consistent manner.

In particular, participating apps shall display this information in a screen or several related screens.

A. Data Elements Collected

Apps shall inform consumers when they collect data from the following categories:

- Age of User
- Biometrics
- Contacts
- Financial Information
- Health, Medical or Therapy Information
- History (such as browser usage)
- Friends
- Location
- Patterns of App Usage
- Persistent Identifiers (CDT)
- Stored Images (such as file or images)
- Time of Data Collection

We anticipate that the data elements to be displayed may be modified over time in response to advances of technology. App developers shall employ a mechanism that facilitates ready consumer access to expanded definitions of each data element.

B. Third Party Data Sharing

Apps shall state whether they share data with any third party entities from the following list of entity types:

- Advertising Networks
- Affiliated Businesses
- App Developer
- Carriers
- Company Publishing or Sponsoring App
- Content Publishers
- Data Analytics Companies
- Data Brokers
- Government Entities
- Other Apps
- Other Developers or Networks
- Operating Systems
- Platforms
- Social Networks

We anticipate that the third party sharing to be displayed may be modified over time in response to advances of technology. App developers shall employ a mechanism that facilitates ready consumer access to expanded definitions of each third party entity category.

C. New types of Collection and Sharing

As new methods of collection, use and sharing continue to evolve, this Model App VTS will be updated. To facilitate ease of use for app developers and consumers, this Model App VTS identifies well-known and common current practices. If, however, an app collects data that is reasonably likely to be of concern to consumers, or uses or shares data that is of significant interest, they should add these items to their disclosure.

III. Short Form Design Elements

The model short form notices provided in Appendix 1 to this document present potential designs for mobile app transparency.   Given the different screen sizes, form factors, User Interface ("UI") options and range of sensors available on devices, these specific implementations may vary. New methods of data collection, new uses, and new types of devices and sensors are likely to be available to consumers in the near future, requiring updates to these forms. To be compliant with this Mobile App VTS, app developers must ensure the following are implemented consistent with the design of the app:

A. Data Elements Described in II.A are listed

B.   Third Party Sharing described in II.B is described
C.   New Types of Collection and Sharing as described in II.C
D.   Items A,B and C to be provided as a list, with items A and B visually separated from each other.
E.   Text and font shall be distinct so as to easily standout from the page background.

We anticipate that some developers will pursue the option of providing notice in multiple languages. If so, these forms are adaptable to that option, which we encourage.

IV.   Linkage to Data Usage, Terms of Use and/or Long Form Privacy Policies
In addition to implementing short form notices, participating app developers and publishers shall provide ready access for consumers to each participating app's data usage, terms of use, or long form privacy policy where legally required. These links should include explanations of how consumers may request deletion of their data collected by the app.