Online Privacy Protection Services to Reduce Personal Information Exposure

April 2020
Background
This presentation offers guidance for online privacy services that can be used to remove your personal information

This presentation is for information purposes only. It is intended to offer information about the availability of online privacy services that can be used to remove your personal information:

• Help explain online privacy services that can be used to take down instances of your and your family’s personal information found on common online directory and data aggregator web sites

• Explain caveats and disclaimers that these services cannot eliminate absolutely all instances of your personal information exposure and that the County of Santa Clara is not liable for any costs or risks associated with using these services. Any subscriptions made by individual subscribers to such online privacy services would be at the expense and risk of the subscriber and not the County of Santa Clara.

• Discuss two potential tools or solutions on the market (although others are available) that can perform these services with a specified set of online directories / data aggregators, specifically with OneRep and PrivacyForCops. Sign-up instructions will be provided for those who would like to subscribe. That process will be explained for each tool.

• Information will be given on where to go to for assistance with the sign-up process, technical difficulties, account management, and other support needs.
Disgruntled individuals or bad actors may attempt to search and discover home addresses, phone numbers, and other personal information.

Disgruntled clients may conduct simple online searches where they can easily locate the personal information of those who they target, to include:
- Home address
- Home phone number
- Personal email address

Threats of verbal and physical violence can be made due to, for instance, the nature of work responsibilities.

Family members have also been targeted (e.g., claims of tracking children to school).
Online Privacy Protection Services Explained
What solutions exist that could help protect online privacy?

• Guidance that can include best practices in protecting personal information online can be provided by the Privacy Office, Information Security Office, and/or departmental offices where applicable. Such guidance can include, for example:
  • Password complexity and wallets
  • Social media behavior
  • Do-not call registry
  • How to submit take-down requests to web sites manually

• In addition, other tools, such as is the focus of this presentation, include online privacy protection services. These services scan common online directories and data aggregators on the web, identify/match personal information provided by their subscribers (e.g., name, home address, phone number, email), and submit take-down requests automatically on behalf of their subscribers.
Data aggregators have proliferated across the internet and can store and display personal information on millions of people.

They may acquire personal information from a variety of sources, to include: publicly available databases, marketing firms, social media platforms.

These aggregators may provide personal information to anyone who searches for it. Searches can be conducted with as little information as a person’s name and city of residence.

Aggregators typically offer basic personal information for free (e.g., to include name, relatives in a household, home address, phone number).

Additionally, aggregators can offer more accurate and detailed personal information for a fee, which can be as low as $10.
Sources that disgruntled people may go to acquire the personal information of others.

<table>
<thead>
<tr>
<th>Examples of Data Aggregators</th>
</tr>
</thead>
<tbody>
<tr>
<td>Intelius</td>
</tr>
<tr>
<td>Spyfinder</td>
</tr>
<tr>
<td>switchboard</td>
</tr>
<tr>
<td>PeopleFinders.com</td>
</tr>
<tr>
<td>Spokeo</td>
</tr>
<tr>
<td>Lexis-Nexis</td>
</tr>
<tr>
<td>PrivacyEye.com</td>
</tr>
<tr>
<td>ChoicePoint</td>
</tr>
<tr>
<td>PublicBackgroundChecks</td>
</tr>
<tr>
<td>Equifax</td>
</tr>
<tr>
<td>Experian</td>
</tr>
<tr>
<td>Transunion</td>
</tr>
<tr>
<td>Donnelly Marketing Database</td>
</tr>
<tr>
<td>Abacus</td>
</tr>
</tbody>
</table>
What value do online privacy services offer

Considering the sheer volume of data aggregators online and that new sources are continually providing personal information to aggregators or other web sites who may publish it, the burden on an individual to manually review each data aggregator for their own personal information and submit take-down requests themselves can be time-consuming and exhausting.

Online privacy services can alleviate this burden by automatically scanning the internet for personal information matches, submit take-down requests, and then continually monitor these sites to make sure the information does not come up again. However, it should be noted that these services may not remove all instances of personal information.
Online privacy services offer personal information take-down services to their subscribers.

These services typically scan around 100* active online directories and data aggregator sites on a routine basis (*As aggregator sites disband or new ones are created, the number of sites may fluctuate. FYI: Social media sites, blogs, and free speech posts are not covered.)

They attempt to match your personal details that you provide (to be explained later in this presentation) with online records from the sites they scan.

Then they act on your behalf, as a subscriber, to submit record take-down requests to these sites.

Each online directory / data aggregator has their own timeline to grant or respond to a takedown request.

Subscribers can log in to their OneRep account and go to their dashboard to check the status of take-down requests.
How would online privacy services work in practice

The subscriber would individually sign up for services on their own, and the subscriber’s relationship would be directly with the vendor / service provider and not with the County.

A subscriber would need to enter certain required information. They may choose to enter as much of the optional personal information as they want, along with any family members should they choose.

A subscriber’s information and any matching results would only be shared by the service provider with them and not the County, which helps to maintain confidentiality with the services provided.
Options for online privacy protection services (sign-up process provided in presentation)

- Several options exist in the marketplace that offer online privacy services that people may subscribe to which offer personal information take-down requests to online directories and data aggregators. The sign-up / subscription process for two of those solutions or tools will be explained after the next section covering Caveats and Disclaimers.

- The two tools that are discussed in this presentation are OneRep (anyone may subscribe) and PrivacyForCops (specific individuals may subscribe)

- While anyone may subscribe and pay for service with OneRep; the other tool, PrivacyForCops, has certain job position requirements under California state law (California Government Code 6254.21 and 6254.24) that must be met in order to qualify for their services. Those job positions required to subscribe to PrivacyForCops include:
  - Law enforcement officers, sworn officers, or other public safety officials (e.g., Sheriff’s Office, Probation Department)
  - Attorneys working for the Office of the District Attorney, Office of the Public Defender / Alternate Defender, and judges
  - Elected Officials
  - Appointed Officials
  - Specific details on eligible job positions are provided at: https://privacyforcops.org/privacy

- As stated, if individuals are not eligible for the PrivacyForCops service, anyone may subscribe to OneRep or, if they choose, to another service of their choice.
Caveats & Disclaimers
No online privacy service can guarantee absolute confidentiality online

- As with any solution, no service can guarantee confidentiality completely.

- Employees and their families should understand that while these tools can alleviate their burden to manually remove personal information from several sources, it is still possible that their information could be accessed from these sources for a certain period of time after the take-down request was submitted.

- Additionally, it should be understood that other online directories, data aggregators, and online sources not covered (e.g., social media posts) can still be searched and display personal information.

- These services should be considered as one approach among other best practices that can be used to assist in reducing the exposure of personal information.
Other Caveats and Disclaimers

• The subscriber’s relationship is directly with the vendor / service provider and not with the County. Subscribers use the online privacy service at their own risk and should direct any questions and concerns if they arise to the vendor. The vendor’s privacy policy, terms of service, and any other company policies would apply to the subscriber’s use of the service. It is incumbent upon the subscriber to understand and agree to abide by those terms and policies.

• The subscriber understands that the County shall not be held responsible or liable for any acts of the vendor, data aggregators, and online directories.

• No solution can guarantee that all instances of personal information will be scanned and removed.

• Vendor and County cannot guarantee that submitted take-down requests will be honored by the data broker / online directory.

• For customer service or troubleshooting issues, subscribers should contact the vendor’s customer service.

• The County is not responsible for the services provided by the vendor nor liable in the event that personal information that should have been in scope, but was not taken down, leads to an adverse event.
Sign-up Process

OneRep

Individual Accounts
Family Accounts
OneRep (web site: OneRep.com)
- Registration link: https://onerep.com/user/login
- Phone number: 518-444-0630
- Email: support@onerep.com

The instructions in the blue boxes can help assist you with signing up

- Start by entering your personal email address.
- You may choose to read their Terms of Service and Privacy Policy first prior to agreeing.
OneRep Sign-up Process (2 of 6)

• You’ll need to provide some of your personal information. This is necessary so that the service provider can scan and correctly match your information with potential online records.

• Also, the County will not have access to any of the information you submit to the service provider.
• You can choose to sign up for an individual plan.

• If you’d like to include any of your household family members, you can sign up for a Family Plan.

• Later on, you’ll be able to add any previous home addresses, phone numbers, email addresses, and aliases (e.g., Johnathan, John; current last name, maiden name) for you and your family members.
OneRep Sign-up Process (4 of 6)

- Enter your preferred payment method (i.e., personal credit card).
- You will have to enter your personal payment details and NOT a County p-card or other County payment method.
- You can also set up recurring payments or change your plan at any time (e.g., change from Individual Plan to Family Plan upon marriage).
- Payment for or reimbursements from the County are not available at this time.

Subscription details

Family Monthly plan - Active
$ per 1 month. Next recurring payment is on
To cancel your subscription, call (518) 444-0630 Monday-Friday 9:00AM - 5:00PM EDT

Payment method

Your Credit Card

Billing History
OneRep Sign-up Process (5 of 6)

• By selecting the Manage Family tab, you can view the personal details that you entered for yourself and any family members.

• By clicking the Add family member button, you can add the personal information of any family members you would like to include. Then click Save & Start Scan.

• You may also edit your and your family member info.
OneRep Sign-up Process (6 of 6)

• The Dashboard view is accessible by clicking on Your Name in the upper righthand corner to select the appropriate menu option.

• You can also change your settings (e.g., account password, contact details) and subscription in this menu as well.

• On top of the Dashboard, you’ll be able to view the total number of your scanned profiles that have been found, potential sites where your information may be a match, removals in progress, and removed.
  • FYI: It may take from two to ten weeks for a profile / record to be removed.

• You’ll also get to see which sites your profiles have been scanned against and progress toward removal.
Sign-up Process

PrivacyForCops

Individual Accounts
Family Accounts
PrivacyForCops Sign-up Process (1 of 6)

PrivacyForCops (web site: PrivacyForCops.org)
- Registration link: https://privacyforcops.org/order
- Phone number: 866-418-0049
- Email: info@privacyforcops.org

The instructions in the blue boxes can help assist you with signing up

• Start by selecting the package you would like.
• You may choose to email them for more information or assistance.
• Once you agree, you’ll proceed to Step 2.
PrivacyForCops Sign-up Process (2 of 6)

- You can select Automated Shipping so that you do not have to mail takedown letters yourself.

- Then if you would like to include household family members, select the appropriate option, and go to the next step.

Your information is always safe here! We use industry standard 256-bit Secure Sockets Layer (SSL) to protect your personal information. We are a California Non-Profit 501(c)(3) organization dedicated to ensuring the safety and privacy of law enforcement officers and public officials. If you need help at any time, call us toll-free at 866 418 0049 or email us at info@privacyforcops.org.

Option 1: Automated Shipping

Keep this box checked to have Privacyforcops.org completely automate the shipping process, assure delivery, and provide you a PDF document for your records. This adds an additional $ charge, which specifically covers our printing and mailing costs. As a reminder, we will be sending out over 40 opt-out request letters all across the country. (85% of our clients choose this option!)

Next Step >

Option 2: Additional Family Members

Keep this box checked if you would like to add one or more family members to your privacy order. For a one time total charge of $, you can add all the members of your family and include them in your opt-out request as long as they live at the same address as you. All family members who reside in the officers address are eligible to be included (90% of our clients choose this option!)

Next Step >
The PrivacyForever option provides ongoing service at a discounted rate.
• You’ll need to provide some of your personal information. This is necessary so that the service provider can scan and correctly match your information with potential online records.

• Also, the County will not have access to any of the information you submit to the service provider.
• You may also add any previous home addresses, phone numbers, email addresses, and aliases (e.g., Johnathan, John; current last name, maiden name) for you and your family members.
PrivacyForCops Sign-up Process (6 of 6)

• Enter your preferred payment method (i.e., personal credit card or personal PayPal account).

• You will have to enter your personal payment details and NOT a County p-card or other County payment method.

• Payment for or reimbursements from the County are not available at this time.
Questions or Issues with Service
Where to Direct Questions about Service, Customer, Support, and Technical Difficulties

For questions about service, account maintenance, web site functionality, technical difficulties, and troubleshooting, please contact the service provider customer support line or email them directly and not internal County departments or the County Service Desk.

- **OneRep** (web site: OneRep.com)
  - Phone number: 518-444-0630
  - Email: support@onerep.com

- **PrivacyForCops** (web site: PrivacyForCops.org)
  - Phone number: 866-418-0049
  - Email: info@privacyforcops.org