

# {Privacy, Privacidad, Приватност} Policies in Social Media: Providing Translated Privacy Notice

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## ABSTRACT

As online social media have become a global phenomenon, popular sites have been translated into many languages. However, since many social media sites rely on crowdsourced translation, privacy-critical pages are not always translated into all languages in which the sites are offered. In this paper, we examine whether or not privacy settings, privacy policies, and terms of service pages have been translated into each language available on five popular, global social networks: Facebook, Flickr, Google+, LinkedIn, and Twitter. We find large differences across sites in the availability of translated privacy pages. Some sites, such as Google+, offer privacy pages in a range of languages. In contrast, Facebook and Twitter’s privacy policies have been fully translated for only 14-15% of the languages in which the sites are offered. Since “notice” is a core principle of privacy, we argue that social media users who don’t speak English are not afforded complete privacy rights. We further assert that it should be the responsibility of the social networks, not the crowd, to ensure that privacy information is fully translated.

## Categories and Subject Descriptors

K.4.0 [Computers and Society]: General

## General Terms

Human Factors

## Keywords

Privacy Policy, Translation, Language, Social Media, Notice, Crowdsourcing, Online Social Networks

## 1. INTRODUCTION

In recent years, the international user base of social media sites has grown rapidly. For instance, from 2006-08, the percentage of Facebook users outside the U.S. increased from 7% to 60% [14]. As social media have expanded internationally, popular sites have been translated into many languages.

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Facebook, for example, is currently offered in over 70 different languages.<sup>1</sup> However, since popular networks, including Facebook and Twitter,<sup>2</sup> rely on crowdsourced translation, privacy-critical areas of some sites have not been translated into all languages in which the sites are offered.

In this paper, we investigate the extent to which the translated versions of popular social media sites support privacy decision-making for users who don’t speak English. In particular, we focus on the concept of “notice,” which stipulates that users be informed about how websites collect, use, and retain their personal information. As many social media sites serve as platforms on which users post and share personal information, it is particularly important that translated privacy information is available for users to make informed decisions.

To evaluate the extent to which users receive notice in their languages, we examine whether privacy settings, privacy policies, and terms of service pages have been translated into each language offered on five global social networks: Facebook, Flickr, Google+, LinkedIn, and Twitter. We find wide variance across sites. While privacy pages on Google+ and LinkedIn have been translated into nearly every language offered by those sites, privacy policies on Facebook and Twitter have only been translated into 14-15% of the languages offered. Both the privacy policies and privacy-settings pages on Facebook and Twitter present numerous cases in which sentences or paragraphs in English and another language are interspersed. We argue that this lack of linguistic coverage violates the privacy tenet of “notice,” and that it should be incumbent on social media sites to provide translations when crowdsourced coverage is incomplete.

We introduce privacy notice and global social networks in Section 2, then proceed to our methodology in Section 3. In Section 4, we present results, which we discuss in Section 5.

## 2. BACKGROUND

In this section, we first introduce the principle of “notice” as a core tenet of privacy principles from different regions of the world. As part of this discussion, we briefly review differences in privacy laws across different regions. We then introduce the global social media sites whose privacy translation practices we investigate, discussing both their mechanisms for translation and recent changes in the terms of service and privacy policies of Facebook and Google.

<sup>1</sup><http://developers.facebook.com/docs/internationalization/>

<sup>2</sup><http://translate.twtr.com/welcome>

## 2.1 Notice as a Global Principle of Privacy

The idea that notice should be provided to users as part of online privacy is encapsulated in a number of privacy frameworks across the globe. For instance, “notice” and “disclosure” are among the core principles of the 1980 privacy guidelines of the OECD, an economic organization comprising 34 countries [11]. “Notice/awareness” is one of the U.S. Federal Trade Commission’s Fair Information Practice Principles [6]. Several levels of “notice” are also principles of the Asian APEC forum’s privacy framework [2]. Consistent with this principle, many websites post privacy policies. Although there are many similarities between global frameworks, there are important distinctions, such as a current EU proposal to establish the “right to be forgotten” [13].

While the concept of notice is central to many privacy frameworks, numerous roadblocks to providing users with easily comprehensible notice have been identified in the literature. Prior work has identified violations of notice through privacy policies that are difficult to read [1, 8], difficult to understand [10], or that take too long to read fully [9]. In this work, we identify incomplete or missing translation as an additional barrier to providing notice.

## 2.2 Social Networks In Translation

In this paper, we investigate the privacy translation practices of five social media sites: Facebook, Flickr, Google+, LinkedIn, and Twitter. Between 61% and 74% of traffic on all five sites comes from outside the U.S. and U.K.<sup>3</sup>

Two of the sites, Facebook and Twitter, use crowdsourced translation. Recent academic work has studied crowdsourced translation, arguing that results comparable to professional translation are possible with the right safeguards in place [18]. *Facebook* is a social network with over 800 million users that has been translated into over 70 languages [5]. Facebook crowdsources its translations through a “Translations” application. Volunteers suggest translations for phrases and vote on suggested translations. The application also allows translators to provide or vote on translation inline, while using Facebook. *Twitter* is a microblogging service with which users post ‘tweets’ of 140 or fewer characters. Twitter is currently offered in 23 languages; translations are suggested and voted upon by volunteers through an online “Translation Center” [16]. Both sites provide definitions of key English words to assist with translation.

Translation is not crowdsourced for the other three sites we studied. *LinkedIn* is a professionally-oriented social network, with about 60% of its users outside the U.S. *Google+* has approximately 90 million users [7]. *Flickr*, a photo sharing site owned by Yahoo, has nearly 80 million visitors, around 60 million of whom live outside the U.S. [17].

Spring 2012 changes in Google’s privacy policy and Facebook’s terms of service were controversial. On March 1st, 2012, Google merged privacy policies for 60 services into a single, all-encompassing policy, allowing data to be shared across services. This change attracted strong criticism in the European Union, including statements from the EU justice commissioner that this change violated EU law [3].

On March 15th, 2012, Facebook posted proposed revisions to its Statement of Rights and Responsibilities. An English language version tracking changes was posted, along with the full text of the statement in English, French, Ital-

<sup>3</sup>Alexa site info. <http://www.alexa.com/siteinfo/>

ian, German, Spanish, Japanese, Turkish, Korean, and Portuguese. Comments on these policies were accepted for one week. No comments were made in Japanese or Korean, 526 comments were made in English, and 36,878 comments were made in German [12]. More than 32,000 of the German-language comments were a sentence that translates roughly as “I reject the changes,” [15] and German privacy authorities claimed that these changes fail to bring Facebook into compliance with German and EU laws [4].

## 3. METHODOLOGY

We examined the privacy settings, privacy policies, and terms of service pages on the four most visited social networks from Alexa’s Global Top Sites:<sup>4</sup> Facebook, Twitter, LinkedIn, and Flickr. We also included Google+, although its traffic is not tracked separately from Google.

We examined each site in all languages in which it was available in February 2012. When a language appeared multiple times (e.g. Portuguese in both Brazil and Portugal), we examined both options yet counted them once. On Facebook, we excluded non-languages (e.g. “Pirate”), as well as Esperanto and Latin, which are rarely spoken natively.

On each social media site and in each language, we examined the main page on which users choose their privacy settings, the main privacy policy, and also the terms of service. For Facebook, these were the “Privacy Settings,” “Terms,” and “Data Use Policy.”<sup>5</sup> Since the Data Use Policy shows only an overview, we also expanded the “Information we receive and how it is used” section. For Flickr, we followed the “Privacy and Permissions,” “Terms,” and “Privacy Policy”<sup>6</sup> links. The privacy settings on Google+ are integrated with the Google accounts page, while the “Terms of Service” and “Privacy Policy”<sup>7</sup> are both linked from the bottom of all pages. For LinkedIn, we considered the “Profile Privacy Controls,” “User Agreement,” and “Privacy Policy.”<sup>8</sup> Finally, we looked at Twitter’s “Settings,” “Terms of Service,” and “Privacy Policy”<sup>9</sup> pages.

We coded pages as *fully* translated, *partially* translated, or *untranslated*. A page was *fully* translated if it had no more than four full sentences in English, with the rest of the page in the non-English language (termed the *target language*). We defined sentences in English as sentences in which at least 75% of the words were in English. *Partially* translated pages contained both more than four English sentences and also more than four sentences in the target language. Pages with at most four sentences in the target language, with the rest in English, were marked as *untranslated*.

## 4. RESULTS

Although privacy settings are available in many languages on social media sites, the availability of translated privacy

<sup>4</sup>Alexa top sites. <http://www.alexa.com/topsites>

<sup>5</sup><http://www.facebook.com/{settings/?tab=privacy}>  
{legal/terms?ref=pf} {about/privacy}

<sup>6</sup><http://www.flickr.com/{account/privacy/}>  
{help/terms/} {help/privacy-policy/}

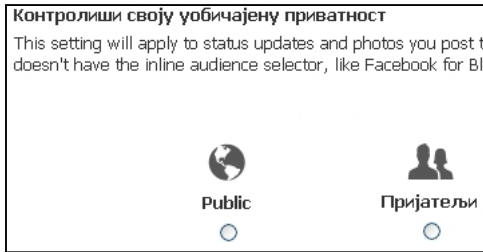
<sup>7</sup><http://www.google.com/{settings/privacy?tab=4}>  
{intl/\*\*/policies/terms} {intl/\*\*/policies/privacy}

<sup>8</sup>[http://www.linkedin.com/{settings/?trk=hb\\_acc}](http://www.linkedin.com/{settings/?trk=hb_acc})  
{static?key={user\_agreement} {privacy\_policy}}

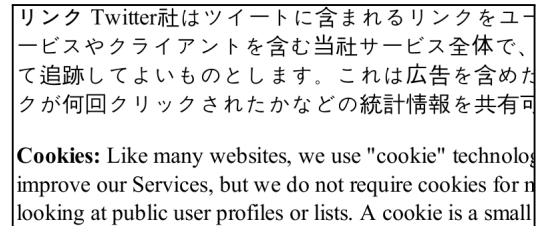
<sup>9</sup><https://twitter.com/{settings/account}>  
{tos} {privacy}

	Non-English Languages	Privacy Settings			Privacy Policies			Terms of Service		
		Fully Translated	Partially Translated	Untranslated	Fully Translated	Partially Translated	Untranslated	Fully Translated	Partially Translated	Untranslated
Facebook	67	49 (73%)	10 (15%)	8 (12%)	<b>10</b> (15%)	26 (39%)	31 (46%)	<b>14</b> (21%)	0 (0%)	53 (79%)
Flickr	9	9 (100%)	0 (0%)	0 (0%)	<b>4</b> (44%)	0 (0%)	5 (56%)	9 (100%)	0 (0%)	0 (0%)
Google+	40	40 (100%)	0 (0%)	0 (0%)	39 (98%)	0 (0%)	1 (3%)	40 (100%)	0 (0%)	0 (0%)
LinkedIn	15	15 (100%)	0 (0%)	0 (0%)	15 (100%)	0 (0%)	0 (0%)	15 (100%)	0 (0%)	0 (0%)
Twitter	22	19 (86%)	3 (14%)	0 (0%)	<b>3</b> (14%)	17 (77%)	2 (9%)	15 (68%)	7 (32%)	0 (0%)

**Table 1: This table shows the number of non-English languages into which social networks’ privacy settings, privacy policy, and terms of service pages have been translated, as a percentage of the total number of non-English languages offered on that network. Boldface indicates a page that was translated into fewer than 50% of languages offered. All numbers are rounded to the nearest integer; thus, some rows don’t sum to 100%.**



**Figure 1: Privacy settings in the Serbian version of Facebook are a mix of Serbian and English.**



**Figure 2: In the Japanese Twitter, as in nine other languages, a paragraph about cookies is in English. The rest of the page is in the target language.**

policies and terms of service pages differs starkly across sites. While Google+ and LinkedIn have privacy policies and terms of service pages for nearly all languages offered, Flickr offers a translated privacy policy for fewer than half of its nine non-English languages. Furthermore, Facebook and Twitter have fully translated privacy policies for 15% or fewer of the languages offered (summarized in Table 1).

Facebook includes 67 contemporary languages other than English, yet much of the site’s privacy-critical text is only partially, or not at all, translated. The privacy settings page is the most widely translated of Facebook’s privacy pages, with 49 full and 10 partial translations into non-English languages. In the partial translations, the privacy settings mix English and the target language (Figure 1). Facebook’s Privacy Policy is fully translated for only 10 languages, and partially translated for 26 languages. For 31 languages, including some of the world’s most widely spoken, such as Hindi and Russian, none of the privacy policy is translated.

Facebook’s terms of service are provided only in English for 53 out of 67 languages. Six other languages have translations of outdated versions (two translations are undated). Only in French, Italian, and Spanish are Facebook’s privacy settings, privacy policy, and terms of service all completely translated and current. However, Facebook includes both a “Spanish” and a “Spanish-Spain” option, and it is only for the latter that the terms of service are in Spanish.

For the “Spanish” option, users are shown the terms of service in English. The translations of the terms of service for the German, Japanese, Korean, and Portuguese versions are outdated but otherwise fully translated.

Flickr has fully translated privacy settings and terms of service for all of its nine non-English languages, but fewer than half of the languages have translated privacy policies. Flickr’s Privacy Policy is only available in French, German, Italian, and Spanish. For the five other languages, only Yahoo’s general privacy policy is available.

Of the 40 non-English languages in which Google+ is offered, privacy settings, privacy policies, and terms of service have all been fully translated for 39 languages. On the Malay language setting, the privacy settings page is displayed in English. In both Estonian and Malay, the privacy policy is in English. However, Google’s March 2012 combined privacy policy supplants individual policies.<sup>10</sup> At the time of the research, this sitewide policy was already available, although not yet in effect, for both Estonian and Malay. We therefore credited Google+ for the translations.

Like Google+, LinkedIn makes translated, privacy-critical information widely available. LinkedIn is available in 15 languages other than English, and the privacy settings, privacy policy, and terms of service are available in each language.

<sup>10</sup><http://www.google.com/intl/en/policies/privacy/preview/>

Twitter performs poorly in offering translated versions of its 22 non-English language options. The privacy settings, privacy policy, and terms of service page have only been fully translated into Indonesian, Portuguese, and Russian. In both Finnish and Hungarian, the privacy policy is only available in English, with a few words of the target language present as section headings. In 17 other languages, Twitter’s Privacy Policy is partially translated. However, in 10 of these 17 languages, only one full, five-sentence paragraph about the site’s use of cookies is displayed in English, with the rest of the page in the target language (Figure 2).

Paragraphs alternate at points between English and the target language for the remaining seven languages for which Twitter has partial translations of its Privacy Policy. For instance, in four successive paragraphs in the Norwegian translation, the first and third paragraphs (“Location Information” and “Links”) are translated, while the second and fourth paragraphs (“Log Data” and “Cookies”) are untranslated. Similarly, seven languages’ terms of service pages alternate between the target language and English, sometimes within the same paragraph. In four languages, the privacy settings page similarly intersperses English and the target language, often within the same paragraph or menu.

#### 4.1 Official vs. Unofficial Translations

While Facebook and Twitter offer fully translated privacy policies for fewer than 15% of their language options, both sites also note that the English language versions legally prevail over translated versions. Facebook explains, “To the extent any translated version of this agreement conflicts with the English version, the English version controls.”<sup>11</sup> Twitter’s Terms of Service provides a similar caveat.<sup>12</sup> For both networks, while translations are incomplete, even translated portions are not legally binding.

Like Facebook and Twitter, LinkedIn notes that translated versions of its terms of service and privacy policy are only for user convenience. In contrast, neither the terms nor privacy policies for Flickr or Google+ note that the translation would be superseded by the English language version.

### 5. DISCUSSION AND CONCLUSIONS

We found wide variance in translation coverage across social media sites. Privacy-critical information on Google+ and LinkedIn is translated into nearly all languages offered, while only 14-15% of the languages offered on Facebook and Twitter have fully translated privacy policies.

The translation of both Facebook and Twitter has been primarily crowdsourced, with both benefits and drawbacks. Facebook is available in nearly 70 languages and Twitter is available in nearly two dozen, compared to the nine languages that the professionally-translated Flickr offers. In this sense, crowdsourcing translation bridges the digital divide, enabling global citizens to participate in social media.

However, Facebook and Twitter both offer the sites in numerous languages without caveats that these translations are incomplete, particularly with regard to privacy notice. Since “notice” is a key principle of privacy frameworks, yet the privacy pages on social media seem to remain untranslated by “the crowd,” we believe it is the responsibility of companies like Facebook and Twitter to ensure that privacy-critical in-

formation is translated. These companies have large, global audiences, yet many of these users are not afforded the same level of privacy notice as English speakers.

Even if all privacy pages were fully translated into every target language on each site, one might argue that these pages would not support consumer privacy due to the high reading level and length of privacy policies [9]. While the role of privacy policies in their current form in communicating privacy-critical information can be debated, we believe that the lack of translated privacy information on both Facebook and Twitter is a key issue. Non-English speakers should not be presented with a language barrier, on top of any other difficulties, when seeking information about how their personal information will be collected and used.

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<sup>11</sup><http://www.facebook.com/legal/terms?ref=pf>

<sup>12</sup><https://twitter.com/tos>