PRIVACY ON THE LINE

What people in India think about their data protection and privacy
Foreword

There is a growing consensus on the need for a Data Protection bill for India. With the rise in smartphone adoption, ubiquity of internet, proliferation of digital services and the introduction of Aadhaar, a unique identity for all Indians, data trails are being generated everywhere. While there is substantial documentation of benefits of capturing real time data to help businesses and government, there is little research on consumer perceptions around data protection and privacy.

Between September and November 2017, a multidisciplinary team of strategists, lawyers, designers and researchers from Dalberg, Future of Finance Initiative at Dvara Research and CGAP set out to understand ‘how do ordinary citizens of India think and act on their privacy and data protection?’ Some of the key questions we wanted to understand were - How aware are people about data usage? What types of data do they value? Does consent matter? What risks and harms do they perceive? How do they make trade-offs and decisions? What are their expectations from the government and service providers?

This document is a collection of insights, design principles and stories from face-to-face interviews with close to 50 people and experts spread across 4 regions of India (Maharashtra, Delhi, Tamil Nadu and Uttarakhand). The interviews used Human Centred Design (HCD) research methods that help to understand not just what people say, but how they think, act and feel. They help uncover what factors drive their decision-making and how they might make trade-offs under different scenarios. The methodology also uses co-design where people are a part of the creating solutions.

While by no means exhaustive, we believe that it provides rich insights into how people, particularly those with limited means, perceive their data protection and privacy. The document also includes guidelines, design principles and potential ideas for how policy makers and providers may consider safeguarding people from harms, and creating better awareness around data protection and privacy.
INTRODUCTION

Summary

Before we embarked on the research, the overwhelming perception surrounding us was that people in India “don’t really care” about privacy. It was felt that, culturally, the concept of ‘privacy’ holds limited relevance in the Indian context and that people are more than willing to trade their data for benefits.

The research has shown us to the contrary. People value privacy for itself. People cared so deeply about their personal data such as photos, messages or browsing history that at times they did not want to share it even with trusted family members. Their personal data was only theirs to see. It could not be traded, no matter the price. Even data that consumers were more willing to share, such as transaction data or personal preferences for products like music, came with conditions. In instances where consumers were sharing data, they wanted providers to seek their consent prior to data collection and wanted a guarantee that no harm would come to them through any malicious use of their data.

People did not always understand what they were consenting to and did not have the cognitive capabilities to process them fully, routinely overlooking important clauses. However, they believed that it was a must for them to be aware of what they were signing themselves up for. Many people who could not read or write wanted more visual, verbal or video forms of consent that they could easily understand without relying on others. A one-time consent however, was not enough for people. Consumers feel that over time, they should have the right to withdraw consent or alter the form of consent, if providers use their data in additional ways, such as passing it onto third-parties.

Most people had experienced fraud (especially via phone impersonators), and did not know how to protect themselves or seek redressal. Where they had inadvertently or carelessly given away their data and suffered financial loss, they held themselves responsible. Women, in particular, were highly vulnerable to reputational harms, and self-censored themselves (for example not sharing phone number or photos) as the only way to protect themselves.

There was high trust placed in public banks and the government. Consumers had an equal measure of disbelief that these institutions or private service providers could betray this trust and share their data without their knowledge or explicit consent. In cases where harm was caused to them as a result of a data breach, they wanted providers to incur liability, government to protect their right to seek redressal, and be compensated fully.

Our conclusion is that people strongly favour a rights-based approach to data protection. In addition to rights and safeguards, they want to know how their data will be used and to give consent for collection as a means to exercise their agency. There was a strong expectation from people that the government should create laws that automatically safeguard their privacy and their data whenever it is used. Finally, they want a humanized redressal system to be in place that is affordable, trustworthy, responsive, and effective.
Key Questions

1. Do people care about privacy and data protection?

2. Are people aware of how their data is collected, stored and disseminated?

3. What do people perceive as risks and harms when it comes to their data?

4. How do people value different types of data?

5. What factors drive people’s decision and trade-offs regarding their data?

6. Do people expect to give consent to data sharing? How can it be informed?

7. To what extent do people expect to control their data?

8. What do people expect from government and providers to safeguard their data?
RESEARCH METHODS

Human Centred Design
Research Locations
Research Methods
Research Tools
Human Centred Design

Human Centred Design (HCD) research enables us to gain deep empathy for users, to question core assumptions, and inspire new solutions. Our goal is to uncover insights through in-context observations of users, and learning from what they say, think, feel and do.

Successful prototypes validated through many cycles of iteration may be scalable.
People we met

Total interviewees: 50
- Gender: 30 Men, 20 Women
- Location: 25 Urban, 25 Rural
- Age: 18 – 80 years old
- Income levels: 1-10 USD* a day
- Education: Illiterate, high school and college educated
- Mobile Ownership: Mix of none, basic and smart

In addition to demographic characteristics, each interviewee was chosen based on behaviours. Examples include:
- Village leader
- Shopkeeper accepting digital payments
- Victim of fraud
- Avid social media user
- Migrant worker

* Excluding three expert interviews
50 people 4 regions

Young. Old.
Men. Women.
Literate. Illiterate.
With mobile. Without mobile.
All living on less than 10 USD* a day.

* Excluding three expert interviews
Key Research Methods

Group interviews
120 minute group interviews and co-design to test policy directions and data protection concepts.

Intercepts
15-30 minute interviews in public locations to get a wider range of perspectives on a few key questions.

In-depth interviews
90-120 min interviews with participants recruited on predefined criteria, using HCD research tools.

Observations
Shadowing key data giving locations such as banks, CSCs, Aadhaar enrolment centres, etc.

Expert Interviews
Interviews to better understand key questions that the research could answer.
INTRODUCTION

Snapshot of Research Tools

1. Customisation vs. Segmentation
2. Denial of Service
3. Data Valuation
4. Same data, different contexts
5. Ecosystem trust map
6. Shareability of Data
7. Data in Product Choice
8. Mental model of harms
9. Data Portal
10. Consent Format
11. Five-Star Rating
12. Grievance & Redressal
WHAT WE LEARNT

Insights
Design Principles
Ideas
Key Themes

1. PRIVACY
2. AWARENESS
3. CONSENT
4. CONTROL
5. TRUST
6. DATA SHARING
7. FRAUD
8. REPUTATIONAL HARM
9. VALUED DATA
10. REDRESSAL
1 PRIVACY
People were highly protective of their personal data, at times even from trusted family members. Personal data included browsing history, WhatsApp and phone messages, call records, personal photos and videos, and GPS location data. People expected this kind of data to be kept private not always because they didn’t trust others, although at times this was the case; but out of a strong sense of ‘mine’, ‘this belongs to me’, ‘not someone else’s business’. People did not want to be watched or seen without their permission, and were willing to go to any lengths to safeguard themselves. Privacy in relation to this kind of personal data was not a commodity to be traded. It was priceless.
“Certain kinds of data are not tradeable. Even if you give me a 100% discount, I won’t share my browsing history.”

- Sushma, Delhi
“I do not want anyone seeing my data, especially my personal data... that is only mine to see.”

- Shakuntala, Mumbai

“I use Appslock, which allows me to keep a separate media gallery on my phone. If the police want to access my gallery, they won’t be able to access Appslock.”

- Saddam, Mumbai

“How is that possible? They can’t have it... What is ours will belong to us.”

- Parameshwari, Chennai
“I didn’t open my Facebook account, my friend opened it for me. He put in everything, but I typed the password.”
- Ganesh, Mumbai

“I used to use WhatsApp to make Video Calls to my friends, but I heard that the company stores your videos. I switched over to Facebook Messenger because I heard that was safer.”
- Sapna, Mumbai

“Somethings are just personal, like shayari (poetry). I don’t even want to share it with my family.”
- Santosh, Uttarakhand
Privacy should be an enforceable right, where citizens can have peace of mind that they or their personal data is not watched by the state or other actors where no clear legitimate interest can be proven. Providers should be restrained about personal data collection – where it is needed, consumers should be provided with easy to understand notice of the nature and scope of collection prior to collection.
Social media websites such as Facebook can make some modifications to make privacy settings more accessible to consumers. For example, Facebook’s current default setting is ‘public’ or ‘everyone’ and the option to change this is nested deep in the menu structure. Below is an illustrative example of how this could be modified to better protect privacy of the users.

ILLUSTRATIVE EXAMPLE

1. Default privacy setting

The default option for sharing personal data (such as email and phone numbers) on platforms like Facebook should be set to no one.

‘Everyone’ is the default option for sharing phone number and email address

‘No one’ should be the default option for sharing phone number and email address
2

AWARENESS
People had little awareness of why certain types of data was demanded of them, what happened once they gave it, who else it was shared with, where it was stored, how long it was kept for and how it could be retrieved. They also had little awareness of data privacy settings beyond the mobile phone lock and password protection. Many felt they could not question a provider if asked for their data, and were unable to imagine the idea that it might be shared with third parties without their knowledge or consent. Misconceptions were also a cause of knee-jerk reactions amongst people. Amongst those who were aware, or made aware of the practice of data monitoring and sharing, there was concern as to what providers could do with their data.

Data is a black hole
“I have no idea why they ask me for this data. What do they do with it?”

- Champa, Uttarakhand
“For SIM cards, they are taking fingerprints. These must be going in the computer. But I don’t know what happens after that.”

- Subhash, Uttarakhand

“Focus on education. People will protect their own data.”

- Sunil, Maharashtra

“When other banks started making offers, I started wondering about where they got my data from”

- Milind, Mumbai
“I don’t think that they [banks and MNOs] can share my data. How could they?”
- Bharat, Uttarakhand

“The Government needs to spread awareness. They can easily discuss these issues at the Gram Panchayat meetings, everyone will be present, and paying attention.”
- Tikam Singh Ji, Uttarakhand

“I’m certain that banks cannot share my data. I would know, I am a Chartered Accountant, I cannot share my customer’s data under any circumstances.”
- Shaheda, Mumbai
Make data visible

Allow people to see how and where their data travels. Give them the right to know what happens to their data throughout its lifecycle (point of collection, service provision, transaction data, storage, sharing, etc.).
Food delivery services like Swiggy and e-commerce companies such as Amazon provide consumers with information along the course of the service/delivery through a transparent and accurate system of notification. This staggered notification system is an analog for how providers dealing with data can also think about keeping consumers up to date about how their data is travelling and is being used.

ILLUSTRATIVE EXAMPLES

1. **Missed call and SMS**
   Consumer could just give a missed call to receive SMS or WhatsApp that notifies them of the flow of their data across various services.

2. **Swiggy/Amazon style data accountability**
   Consumers could view a dashboard on a mobile app or a website to view the flow of their data across various services.

3. **Safety card**
   Infographic like they have for flight safety explaining a basic data lifecycle to consumers across the country. Could be printed or available digitally.

4. **Community awareness drives**
   Create awareness drives at the community level through meetings, phone messages and TV ads that educate people on how to protect themselves and their information from unauthorised use.

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**SWIGGY Food mobile app**

Swiggy has a mobile app as well as a website which allows consumers to track their order status. It sends email and SMS updates as well.

**AMAZON E-commerce service**

Amazon sends SMS updates on the status of goods purchased and even shows exchange and refund status. It also has a mobile app and website.
3

CONSENT
Consent was perceived as necessary. People were unaware that they were giving organisations consent to use their data when they signed a terms and conditions sheet. People felt that they didn’t have the knowledge, capacity or agency to engage with the lengthy, detailed and text heavy consent clauses that are currently used. Indeed, hardly anyone read consent clauses, no matter how educated. People who couldn’t read or write felt that they didn’t stand a chance against pages of fine print. If at all, they relied on others heavily to communicate to them what they were consenting to. The cognitive costs of consent seemed too high for people to consistently give informed consent. However, there was a natural understanding and expectation that they would be asked before any of their data would be used. Consumers expressed a unanimous wish to provide consent prior to sharing personal data, even if other safeguards and rules were to be in place. People wanted to be aware of what they were consenting to and responded enthusiastically to visual and verbal styles of consent.
“The format of consent should be like a ‘2 minute Maggie’ video.”

- Kalyani, Maharashtra
“Chhota akshar danger hota hai [The fine print is dangerous].”

- Raju, Mumbai

“If even 1% of the people actually read the terms and conditions, I did be surprised.”

- Sanjay, Uttarakhand

“I read the first line, because it’s probably the most important, and the shortest two lines. I skipped everything else.”

- Varsha, Mumbai
“Those who aren’t educated ask me to fill in their LIC forms for them. How will they protect themselves and provide consent?”

- Yashpal, Uttarakhand

“If it’s written on paper, then those who can read, can read it. But for those who don’t know how to read, it should be in a form they understand.”

- Prakash, Uttarakhand

“Option should be given to everyone and it should be communicated well.”

- Mohamed, Mumbai
Providers should be held to rigorous standards to design consent in a simple way that consumers, even the ones who cannot read or write, understand at a glance. The language of consent should fit that of the person giving consent.
Prototype consent forms developed by Dalberg resonated highly with respondents. While short, clear, video-based consent explanations were preferred by most people, their larger underlying ask was for consent to come in a more understandable form.

ILLUSTRATIVE EXAMPLES

1. Pictorial consent forms
   Have graphic representations of things people are consenting to. The short captions could be in regional languages.

2. Video consent
   Video consent, created in the style of an advertisement, holds high potential as it is a format that is easy to understand across consumer segments and is also more easy to scale than having a dedicated personnel to explain terms and conditions.

3. Verbal/phone based consent
   Having a representative at the point of data collection/ contact the consumer, who is responsible for clearly explaining the utilisation of data.

RECOMMENDED Pictorial consent form

### CURRENT Loan application form

<table>
<thead>
<tr>
<th>Field</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
<td>Full Name</td>
</tr>
<tr>
<td>DOB</td>
<td>Date of Birth</td>
</tr>
<tr>
<td>Address</td>
<td>Residential Address</td>
</tr>
<tr>
<td>Email</td>
<td></td>
</tr>
<tr>
<td>Phone</td>
<td></td>
</tr>
<tr>
<td>Occupation</td>
<td></td>
</tr>
<tr>
<td>Income</td>
<td></td>
</tr>
</tbody>
</table>

### RECOMMENDED Pictorial loan application form

- **Explain in local language using simple steps.**
- **Include local photos to make consent forms more relatable.**
- **Use visuals and graphics to show what is being consented to.**
- **Summarise key points in a simple way.**
- **Provide clear and concise information.**
- **Use white space effectively.**

### RECOMMENDATIONS

- **Use simple language.**
- **Avoid legal jargon.**
- **Include examples.**
- **Use visuals.**
- **Ensure clarity.**
- **Focus on key points.**

Recommended direction for pictorial consent form – succinct and in simple steps.
Control was desired even after consent

People did not want to provide blanket consent and hold the expectation that consent will be asked for at each step along the way. They wanted consent to be to-the-point and clearly linked to the service provision moment. People expressed the desire to have some bargaining power in the form of even a partial or limited service option rather than a complete denial of service in the absence of complete consent. Furthermore, giving consent did not indicate to people a loss of ownership over their data. Consent was seen as the first step to a transaction or the beginning of a relationship with the provider. Consumers want control and continued engagement after this initial consent, with the ability to modify their information and retrieve it in the event of discontinued service such as switching to another provider.
“Data should be used in a ‘step-to-step’ basis... only when required.”

- Varsha, Mumbai
“I should have control over my data or it should be allowed by law.”

- Shaheda, Mumbai

“Signing terms and conditions is not a matter of choice- it’s something that you have to do because you have no choice.”

- Sanjay, Uttarakhand

“I should have the right to withdraw and alter my consent.”

- Yashpal, Uttarakhand
“Personal information should not be retained by companies after the service is discontinued.”
- Anand, Uttarakhand

“How can they share my data? They need to ask me first.”
- Parameshwari, Chennai

“Data should not be stored once the service is completed.”
- Milind, Mumbai
Make it easy for people to view who has what type of their data, for how long they’ve had it. Give people the right to withdraw or rectify their data from providers or services they’re no longer using. Give people comfort through rules that data will be held only as long as needed.
Smartphone applications on Android operating systems ask for consent to access data only at the moment that it is required, including an option to revoke permission that is already given. This can be replicated on a multiple channels, not just on smartphones.

ILLUSTRATIVE EXAMPLES

1. ‘Just in time’ consent
Ask consumers for consent right before they are going to perform an action which involves sharing of their data using SMS, phone call or mobile app notification.

2. Modify data sharing privileges
Allow consumers to go back at any point and revoke or modify data sharing privileges granted to a service using an SMS or mobile app/website.

3. Data dashboard
Provide consumers a dashboard that displays all the data that they have consented to give, giving them the option to revoke their consent, highlighting known risks and providing tips and tricks to stay protected.

‘Just in time’ consent on Instagram app through a pop-up, asking permission from the user right before posting a photo/video using the app.

App permissions for Instagram where a consumer can revoke data sharing privileges for different types of data at anytime.
While ‘data that only belongs to me’ was sacred and untradeable, there were other types of data (such as contact details, transaction data, or social media preferences, etc.) where people wanted a guarantee, more than any benefit. They wanted 100% assurance of the credibility of the person and/or institution behind it, that it will not be misused, and no harm will be caused to them. They wanted a clear rationale for why the data was being demanded of them. Small costs or benefits didn’t matter as much as trustworthiness. Government was often the most trusted institution followed closely by public banks and then by private banks or MNOs – social media companies were trusted the least. People expected that those they placed the most trust in would never betray them by doing things that were not in their interest.
“If the company people are not keeping my data safe and sharing it, then I will avoid the company.”

- Rubina, Mumbai
“If provided safety and guarantee I am willing to pay a small premium.”

- Kokila, Chennai

“I trust the Government, but not the politicians.”

- Sunita, Uttarakhand

“More than benefit, we want guarantee from the person who is asking for data that they are credible and will not misuse it.”

- Ganga, Uttarakhand
“If someone asks me for my documents, I will ask them for theirs.”

- Kamla, Uttarakhand

“My data could also be misused, the bank or mobile company should not be allowed to do anything wrong, and should be responsible for anything that does go wrong.”

- Tikam Singh Ji, Uttarakhand

“If banks take responsibility for protecting my data, I am willing to share it.”

- Parameswari and Palaniyandi, Chennai
People trust the government to set rules around data practices to protect them. In addition, it would help to set up a code of conduct or rating system for providers to allow consumers to easily differentiate between those with good data practices (such as secure data storage, stringent third-party sharing norms, etc.) and those without. This will allow consumers to make more informed choices in provider selection, accounting for individual preferences on privacy and data protection.
Smartphone applications on Android operating systems ask for consent to access data only at the moment that it is required, including an option to revoke permission that is already given.

ILLUSTRATIVE EXAMPLES

1. Code of conduct
Incentivise industry players like banks, MNOs and social media companies to develop and publicize a trust code for consumer data protection.

2. Rating system
Pass a legislation to mandate industry players like banks, MNOs and social media companies to come up with a ‘5 star rating’ system on data protection which will be monitored by third party auditors.

SA-DHAN for code of conduct

Sa-dhan is an RBI recognized self regulating organisation for MFIs that has formulated its own code of conduct for consumer protection.

‘GREEN PADLOCK’ rating system

‘Green padlock’ icon with ‘Secure’ text signifies that data will be encrypted and kept private to the website being used.
Show me the benefit if you want my data

If a guarantee was in place, some people were willing to consider the benefits of third party data sharing, as long as it was clear what those benefits were and the trade-offs they were making. The shareable data in this case included things such as their contact details, transaction data, social media preferences etc. Sometimes these benefits were individual (more personalised offers, better discounts, etc.), but at times they were collective in nature (for example for providers to be able to identify a SIM card owner easily in case of fraud). It’s important to note people wanted customised offers, not generic ones in exchange for their data. They did not want to be bombarded by telemarketers selling them things they did not need. There was a clear line between feeling ‘valued’ as a customer and a ‘target for spam’ with unnecessary offers.
“If it is not for our benefit, then it must be for their benefit. I will give my data if the benefit is in my favor.”

- Subhash, Uttarakhand
“If I receive a benefit from sharing my data, I am willing to do so.”

- Sushma, Delhi

“If Myntra (online shopping platform) sells my data to other parties and benefits from it, that’s ok. Data sharing for customized marketing purposes is a beneficial thing for me.”

- Kalyani, Maharashtra

“Data usage for justifiable business practice is okay. Companies should keep record of data only when it is mandatory.”

- Sunil, Maharashtra
"If there is no benefit why would I give my data? Only if the company tells me upfront, I am okay with it, however that rarely happens."

- Prashant, Mumbai

"Aadhar will result in an increase in tax collection for the country, which will help everyone."

- Sunita, Uttarakhand

"If the bank gave me some free EMIs then I would consider giving consent to them sharing my data to advertisers and marketing agencies..."

- Varsha, Mumbai
People want to have a clear understanding of who is benefiting and how. They want to know how they’re benefiting versus the community or the providers or the government as a result of their data sharing. Providers who requested data beyond legitimate interest (what is needed for effective service provision or mandated by the law) need to be able to clearly articulate costs versus benefits to the users.
Mechanisms to clearly communicate risks and benefits to consumers, such as the Schumer box, which mandates norms for clear disclosure, have been introduced in the USA as well as the UK.

ILLUSTRATIVE EXAMPLES

1. ‘Schumer box’ for India

Banks, MNOs, social media companies should mandatorily display their data sharing risks and benefits to consumers in the style of a Schumer Box and make it available as a printed and digital copy.

2. Awareness sessions

Government to conduct localized community level awareness sessions periodically at the village and town levels to make the benefits and risks of common services like bank account, loans, social media, sim cards, etc. clear to consumers.

SCHUMER BOX infographic

Schumer box highlighting the benefits and risks of applying for a credit card.

Credits: https://www.nerdwallet.com/blog/nerdscholar/read-schumer-box/
People assume fraud is inevitable

Nearly everyone we met had experienced some form of fraud or knew someone who had. We heard several cases of phone impersonators asking for bank accounts or ATM pin details. When asked where the impersonators might have gotten their numbers from, people shrugged and felt “they must have gotten it from somewhere.” Surprisingly very few people had complained about impersonation calls. There was a perception that with the rise of the digital economy, there is a greater risk of fraud committed by savvy hackers. Despite the recognition that they may be at risk of malicious third-party action, many consumers felt that ultimately they were responsible for any untoward outcome, particularly if they had given out their phone or bank account details. Where they had not, they felt it was the government’s job to protect them and private provider’s job to compensate them. A lack of trust in how their data is handled may also lead to a lower willingness from people to participate in services being offered.
“Ever since everything has become digital, fraud has increased.”

- Naseer, Mumbai
“Lots of people keep calling to say, ‘put money in this bank account, you have won a lottery’!’. My friend lost INR 40,000 this way”

- Saliya, Mumbai

“A lot of fraud is happening these days... I think it’s a big problem. I feel like I shouldn’t keep my money in the bank only.”

- Sapna and Shakuntala, Mumbai

“While using Paytm and online banking I am very careful about who I give my phone number and account number to. Anyone can hack my account.”

- Santosh, Uttarakhand
"If I give my data outside without understanding, it is my mistake. But if someone steals my data, then how can it be my error?"
- Tikam Singh Ji, Uttarakhand

"Everyone knows someone who has lost money."
- Sumitra, Mumbai

"I got a call on my mobile asking for my account number and ATM pin. They took away money from my account."
- Subhash, Uttarakhand
Currently, consumers are bearing a disproportionate burden of the cost of any kind of fraud/harm going forward, providers and regulator should bear some liability. For example, in case of financial loss, consumers currently receive no compensation. While consumers could share some responsibility and even limited liability in exceptional cases, shifting the liability to providers gives them the right incentives to take steps to reduce the risk of fraud.
Legislation like the US Fair Credit Billing Act of 1974, and the RBI's circular limiting the liability of customers in unauthorised electronic banking transactions shifts most of the burden to the provider including financial compensation.

ILLUSTRATIVE EXAMPLES

1. Legislation
   Make it mandatory for Financial Service Providers (FSPs) to compensate the consumer in the event of a financial fraud and limit the amount a consumer has to bear. Also, incentivise the FSPs to create awareness and take preventive measures against frauds.

2. Third party audits
   Government should set-up a body or have independent agencies with incentives to hold the FSPs accountable and fine them for lapses in consumer protection in event of a financial fraud.

FAIR CREDIT BILLING ACT

This public law was introduced in 1974 in USA.

LIMITED consumer liability

In case of financial fraud, the Act limits consumer liability to USD $50 and most of the times it is waived off.
8

REPUTATIONAL HARM
High social costs inhibit women from sharing data

We heard many instances where women regulated and in some cases heavily self-censored their behavior to prevent misuse of their personal data (photos, social media messages, etc.). Many feared high personal consequences (such as marital discord, sexual harassment) and were afraid of social shaming as a result of it. They often relied on or were heavily guided by others (husbands, brothers, more educated people) on what they could do to protect themselves. At times, despite taking precautions they underwent harm and mental stress as a result of their social reputation having been damaged. Women appeared to be more privacy conscious because of the more immediate costs to them in society.
“I’ve decided not to share my picture with anyone, because of what can go wrong.”

- Kokila, Chennai
“Video calls can be misused by people to cause shame publicly. For this reason, I do not share it.”

- Sapna and Shakuntala, Mumbai

“Harassment over the phone happens very often. It’s the most common problem.”

- Varsha, Mumbai

“The SHG women did not understand the terms and ended up defaulting on the loan, [bank employees told the entire village] which gave them a bad social name. They felt mentally stressed.”

- Deepa, Uttarakhand
“Pictures can be very dangerous, I saw on crime patrol that things can go very wrong, people change picture on the computer and share it with everyone”

- Sushma, Delhi

“Photos can be misused to cause problems between husband and wife... a photo carries immense value. It is my decision to not share my pictures with anyone because of what can go wrong.”

- Kokila, Chennai

“Photos cause lot of problems on uploading, they are edited using photoshop and shared amongst everyone. The police held a meeting where they told us not to upload any pictures, since a lot can go wrong.”

- Rubina, Mumbai
Make safeguards accessible for women

Women need support/services to help them protect themselves online and offline. There is a need for additional awareness generation amongst women around the ways that they can protect themselves from personal, social or reputational harm. Privacy settings should be more clearly signposted and safeguards pre-designed into products and services by providers to protect women from harms that can be avoided.
Companies have introduced SOS features for their users to reach during emergencies at the press of a button. These measures were in response to reports of crime against women.

ILLUSTRATIVE EXAMPLES

1. **SOS button and Hotline**
   In case of an emergency, an SOS button should be available to women across platforms like Facebook, WhatsApp, Instagram, Hike, etc.

2. **Auto configuration**
   When social media platforms detect female consumers, they automatically display tailored privacy options.

3. **Group meetings**
   Government should conduct localized community level discussions where privacy options and rights of individual to privacy on availing Self Help Group (SHG) or MFI loans are explained and consumer doubts are cleared.

The red ‘SOS’ button on the mobile app allows consumers to alert the police control room or emergency contacts. Consumers can also share their taxi ride and tracking info with their friends and there is a physical red alarm button in every taxi.
9

VALUED DATA
Aadhaar was consistently one of the most valued pieces of data. For the poor, it was a means to access various benefits. Most people felt Aadhaar was a good thing, as it allowed them access to multiple services with ease. They also felt it kept the ‘bad’ people accountable. However, they were equally concerned about the security of their Aadhaar and the dangers of it falling into the wrong hands. For example people said that they had seen SIM card providers issue multiple SIMs under the same Aadhaar identity by making people give their biometric multiple times. Others also felt it was a form of surveillance by the state that went beyond just securing people to watching every action of theirs.
“Aadhaar is an extremely powerful tool. You can use it to understand the lies and truths of any individual.”

- Ganesh, Mumbai
“If data sharing allows the government to catch those who break the law and a few people suffer due to it, that’s okay.”

- Sunil, Maharashtra

“I am the owner of my own Aadhaar card and no one else.”

- Sunita, Uttarakhand

“A lot of personal information is on Aadhaar… there is no reason to link everything. Why should I share my day to day life with the government?”

- Milind, Mumbai
"Terrorists can use Aadhaar to get SIM cards, it is important to keep the number safe."

- Prashant, Mumbai

"The person who made Aadhaar is responsible for anything that goes wrong."

- Ganga, Uttarakhand

"The government is responsible for keeping my Aadhaar safe. I am sure they have a security system in place."

- Santosh, Uttarakhand
Ensure highest security for the most valued data

It is vital for the state to ensure maximum security for what is increasingly the most valued and demanded piece of data. They should prevent its misuse and ensure the right redressal mechanisms in case of one.
Conducting hackathons or challenging people to break into databases or software can reinforce security in case flaws are found, and communicate security in case there are no breaches.

1. Hacking competition
Conduct a ‘Hack Aadhaar if you can’ competition with a big prize for any successful hacks. Also spread awareness about security measures employed by Aadhaar.

2. Regulatory oversight
The government should have strict regulations for MNOs to curb the issue of multiple sim cards being issued on a single person’s biometric without their knowledge. They should also crack down heavily on miscreants duplicating Aadhaar cards.

ILLUSTRATIVE EXAMPLES

EVM HACKATHON news article

Article describing the Electronic Voting Machine (EVM) hackathon challenge

Credits: https://thewire.in/138190/evm-election-commission-hackathon/
10 REDRESSAL
There is low faith in redressal, but high demand

Traditional forms of redressal left people cynical and wary of its effectiveness. They had far too many experiences of being left hanging at the other end of the customer service line or filing complaints that never saw the light of day. At the same time they strongly felt that effective redressal options need to be immediate and tangible. They also wanted awareness of such mechanisms, and for them to be affordable for them to make use of it.
“To seek redressal, you need both knowledge and money.”

- Deepa, Uttarakhand
“I want to talk to someone who is knowledgeable, preferably from the Government or the police.”

- Mohamed, Mumbai

“It will be good if consent were explained verbally. Video consent with animation explaining consent conditions clearly will be good.”

- Anitha, Tamil Nadu

“The point of data collection should coincide with the point of grievance redressal.”

- Santosh, Uttarakhand
“It should not be on the phone - I want to see the person’s face when I’m making the complaint. I want to see if they understand what I’m saying.”

- Nasser, Mumbai

“Calling a toll free number to complain about data privacy violations will not work because it will always be busy.”

- Saliya, Mumbai

“I want an agent to talk to when I am lodging complaints as I believe they can guide me better.”

- Azad, Mumbai
People wanted redressal for data breaches to be immediate and at the point of sale or service. In case the service provider was unable to provide redressal they would approach other institutional agencies (police, gram pradhan, etc.) for redressal. They strongly felt that effective redressal is only possible if there is a person they can interact with face-to-face who is trustworthy and responsive.
Quasi-judicial formats such as those used by banks and customer service models used by mobile app services can be replicated specifically for incidents related to data breaches.

ILLUSTRATIVE EXAMPLES

1. Better Ombudsman model
Have an ombudsman office for redressal of data protection and privacy issues. Learn from what did not work in the bank ombudsman model and avoid those pitfalls.

2. Follow new age digital services
For Urban Ladder, Swiggy, Amazon, Flipkart, etc. digital services, multichannel redressal methods have worked well. Avoid MNOs customer care or IVRS routes.

TYPICAL REDRESSAL screens for a mobile app

FAQ style menu for issues on resolving a digital transaction

Options to call an agent or email to resolve the issue with a time guarantee of resolution. Also, an SMS is sent as reaffirmation.
### SUMMARY

<table>
<thead>
<tr>
<th>PRIVACY</th>
<th>AWARENESS</th>
<th>CONSENT</th>
<th>CONTROL</th>
<th>TRUST</th>
</tr>
</thead>
</table>
| Privacy is valued in itself.  
"Certain kinds of data are not tradable. Even if you give me 100% discount, I won’t share my browsing history."  
- Sahana, Delhi | Data is a blackhole.  
"I have no idea why they ask me for this data. What do they do with it?"  
- Champa, Uttarakhand | Consent is broken, but a must.  
"The format of consent should be in the 2 minute Maggie video style."  
- Kishori, Maharashtra | Control was desired even after consent.  
"I should have the right to withdraw and alter my consent."  
- Yashpal, Uttarakhand | Guarantee trumps benefit.  
"If the company people are not keeping my data safe and sharing it, then I will avoid the company."  
- Shines, Mumbai |
| Make privacy the default. | Make data visible. | Make consent understandable at a glance. | Allow people ongoing control of their data. | Create a trust code or rating system. |

<table>
<thead>
<tr>
<th>REDRESSAL</th>
<th>VALUED DATA</th>
<th>REPUTATION HARM</th>
<th>FRAUD</th>
<th>DATA SHARING</th>
</tr>
</thead>
</table>
| There is low faith in redressal, but high demand.  
"To seek redressal, you need both knowledge and money."  
- Deepa, Uttarakhand | Aadhaar is too precious to be misused.  
"Aadhaar is an extremely powerful tool. You can use it to understand the lies and truths of any individual."  
- Ganesha, Mumbai | High social costs inhibit women from sharing data.  
"I’ve decided not to share my picture with anyone, because of what can go wrong."  
- Kokila, Chennai | People assume fraud is inevitable.  
"They since everything has become digital, fraud has increased."  
- Naaseer, Mumbai | Show me the benefit if you want my data.  
"If it is not for our benefit, then it must be for their benefit. I will give my data if the benefit is in my favor."  
- Rohit, Uttarakhand |
| Humanize redressal. | Ensure highest security for the most valued data. | Make safeguards accessible for women. | Shift the burden of liability to providers. | Make benefits and risks of data sharing tangible. |
THANK YOU
PRIVACY ON THE LINE