

West Virginia Executive Branch Privacy Policy: Notice

Privacy Notice Considerations

Question:

How can I effectively provide our privacy notice to individuals with special needs?

Answer:

When developing or delivering privacy notices, you must consider your audience.

For example, if you routinely collect private information (PI) from people who can't read well, a written privacy notice will not effectively provide information about our privacy practices. Instead, one step in your process may be to offer to read the privacy policy to the individuals. Similarly, if you collect PI from sight-impaired persons, a written privacy notice might need to be printed in large print or Braille.

The Executive Branch Privacy Notice Policy requires us to make information about our privacy practices available to individuals. It is critical that we communicate that information as effectively as possible. Here are some tips for effective communication:

- * Ask whether the privacy notice recipients have any special needs. Will most of the recipients be able to read a printed notice easily? If not, how can I effectively provide privacy information to them?
- * Is my privacy notice written in "plain English"? Always try to use simple, common words. Avoid legal jargon. Short sentences also improve readability.
- * Is my privacy notice written using familiar first and second person pronouns, such as "you" and "we"? Is my privacy notice written using active verbs? "We may share your information with our service providers." is much easier to understand than "Public assistance beneficiary information may be disclosed to companies providing services to the Department."
- * Does my privacy notice look appealing? You can use color and layout to enhance the appearance and readability of the privacy notice. Be sure that the colors and graphics are not distracting. Also be sure that colors will reproduce clearly if the notice is faxed or copied in black-and-white.
- * Is the font big enough? Will most of the recipients be comfortable with the type size? If you often provide your notice to older individuals, consider a large font.
- * Do I need to translate the privacy notice into another language? Do I need to have a script so that I can provide information about privacy practices orally or over the phone?

Your Privacy Officer can help you adapt your privacy notice to address any special needs. Your Privacy Officer can also help you develop other tools, such as scripts, that might be helpful.