

The cost of managing your privacy



Insights from a 24-hour privacy sweep

CPRC

The Consumer Policy Research Centre (CPRC) is an independent, not-for-profit, consumer think-tank. CPRC aims to create fairer, safer and inclusive markets by undertaking research and working with leading regulators, policymakers, businesses, academics and community advocates.

Acknowledgements

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Statement of Recognition

CPRC acknowledges the Traditional Custodians of the lands and waters throughout Australia. We pay our respect to Elders, past, present and emerging, acknowledging their continuing relationship to land and the ongoing living cultures of Aboriginal and Torres Strait Islander Peoples across Australia.

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Introduction

As the privacy reform debate continues in Australia, the all too familiar rhetoric of businesses having to shoulder the cost of regulation is now echoing through many consultation processes. But what is it costing Australian consumers?

Our current privacy protections are built on notice and consent. Notification can be in any form – buried deep in a privacy policy, a pop-up that states that by simply using the app or site you are agreeing to the terms and conditions, or a specific screen for you to adjust your settings to your preferences.

This report covers key insights from a privacy sweep undertaken in May 2024. Over a 24-hour period, nine participants located and adjusted the privacy settings of every website or app they engaged with, timing how long each action took. Participants also located and logged the word count of the privacy policies of the apps and websites they were using to help calculate average reading time for those policies.

Managing privacy settings were often difficult, sometimes with deliberately complex processes to opt-out of unfriendly practices. On **45%** of occasions, participants found it difficult to locate and adjust privacy settings, with one website so poorly designed it took 10 minutes simply to locate the privacy settings.

We also compared the experience of participants in Australia with a participant based in Europe to explore a difference in experience. We found that the average time to manage privacy settings for the EU participant was just **3.1 seconds** per website, while it was close to **two minutes** per website for our Australian participants.

Placing the burden on individuals to manage their privacy settings is not working for Australians. The Federal Government needs to shift the burden far further towards businesses who are ultimately creating, embedding and profiteering from data hungry business models.

Australians deserve an online experience that is designed with them in mind – where they are not opted-in by default to having their information collected, shared or used in ways that leaves them worse off.

INSIGHTS FROM 24-HOUR SWEEP



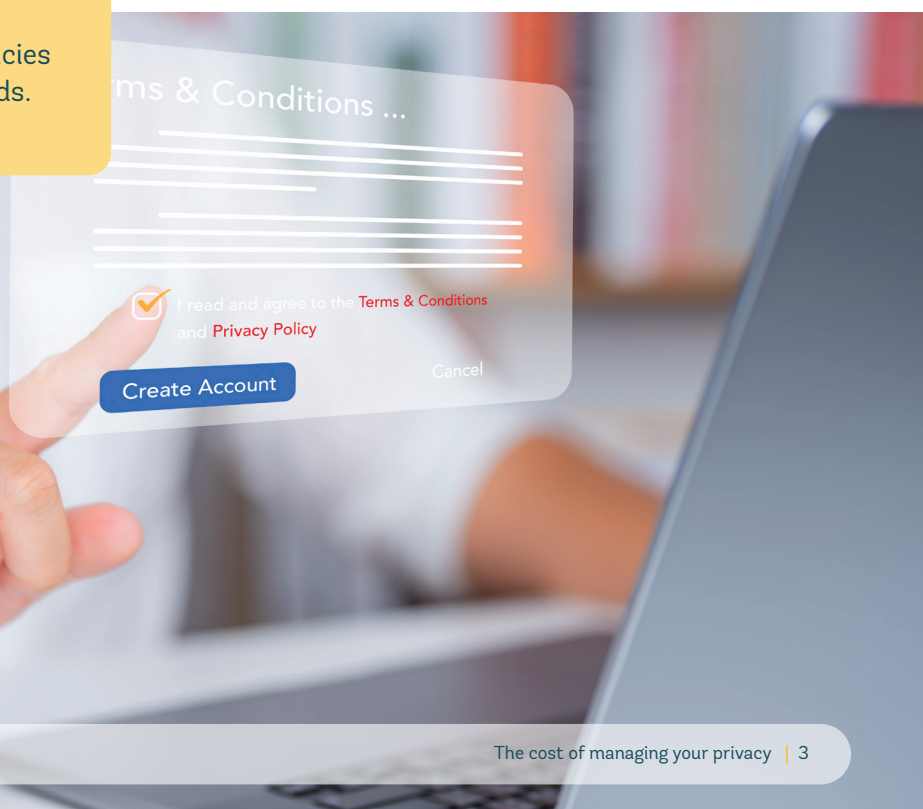
Australians need to carve out approximately **30 minutes every day** just to adjust their privacy settings.



This is in addition to dedicating on average **14 hours** just to read the privacy policies of the sites and apps used in one day.



Some of the longest privacy policies were in excess of **300,000** words.



Methodology

Over a 24-hour period across 15-16 May 2024, nine participants engaged in a privacy sweep, logging their experience across unique websites and apps they visited over the sweep period.

The sweep involved two tasks when visiting a website or app for the first time during the 24-hour period:

1

Locate and adjust the privacy settings under timed conditions.

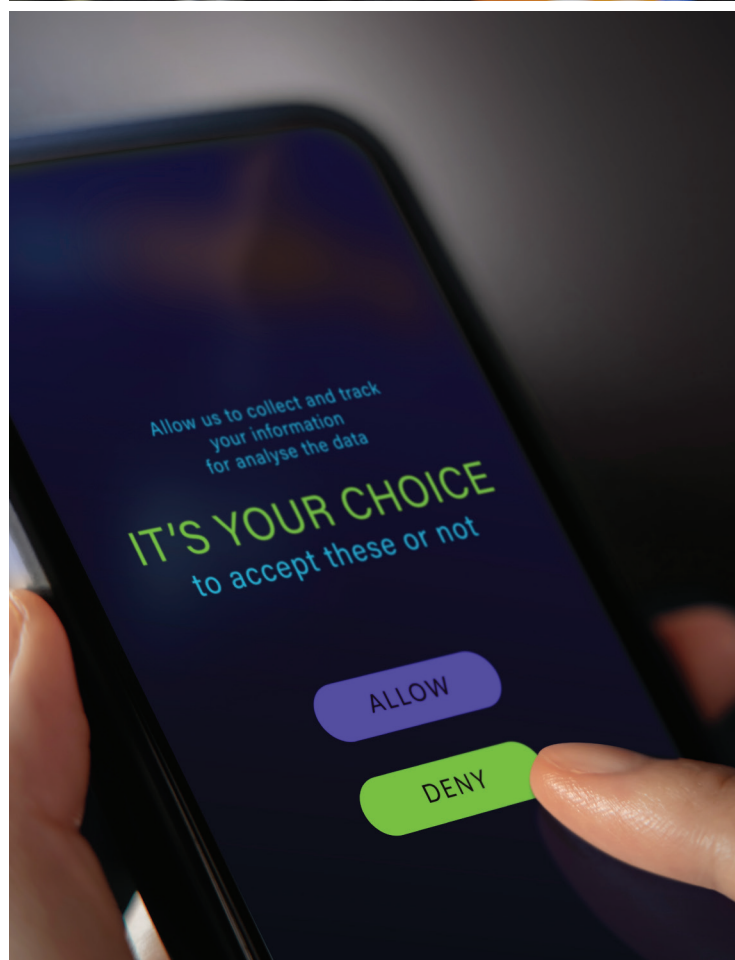
2

Locate and scan the organisation's privacy policy and conduct a word count.

A first-time visit for the sweep was defined as visiting a site or app for the first time on a single device. If a participant used multiple devices, then the first visit of the site or app on other devices was also recorded.

Participants used an online survey to log their experiences throughout the 24-hour period. This included a time-recording feature to measure the time taken to locate and adjust the privacy settings. Participants also used an online automated word counter to calculate the word count of the privacy and cookie policies related to the sites and apps they were visiting. We acknowledge that the word count using the automated tool may slightly vary from the exact word count, but the tool was used to calculate a general approximation of reading time. For analysis purposes, reading time was based on an average reading speed of 238 words per minute.¹

In total, 98 surveys were collected from eight participants based in Australia and one participant based in Europe during the 24-hour sweep. Data was cleaned to remove any incomplete participant data. Some charts have been filtered to compare responses from Australia with those received from outside of Australia.



¹ Brysbaert, M., 2019, *How many words do we read per minute? A review and meta-analysis of reading rate*, *Journal of Memory and Language*, Volume 109, <https://doi.org/10.1016/j.jml.2019.104047>

Privacy sweep insights

Carve out nearly 30 minutes a day to protect your privacy

It took an average of **27.4 minutes** over the **24-hour** period for participants to locate and adjust privacy settings for sites and apps where adjustment was an option. Each site or app required anywhere from **two to 10 minutes** of time to locate and adjust the settings. This was in stark contrast to the participant based in Europe who spent on average only **3.1 seconds** per website to manage privacy settings. This is likely due to the clear pop-up option to 'Reject all' cookies as soon as you enter a website within the EU jurisdiction.

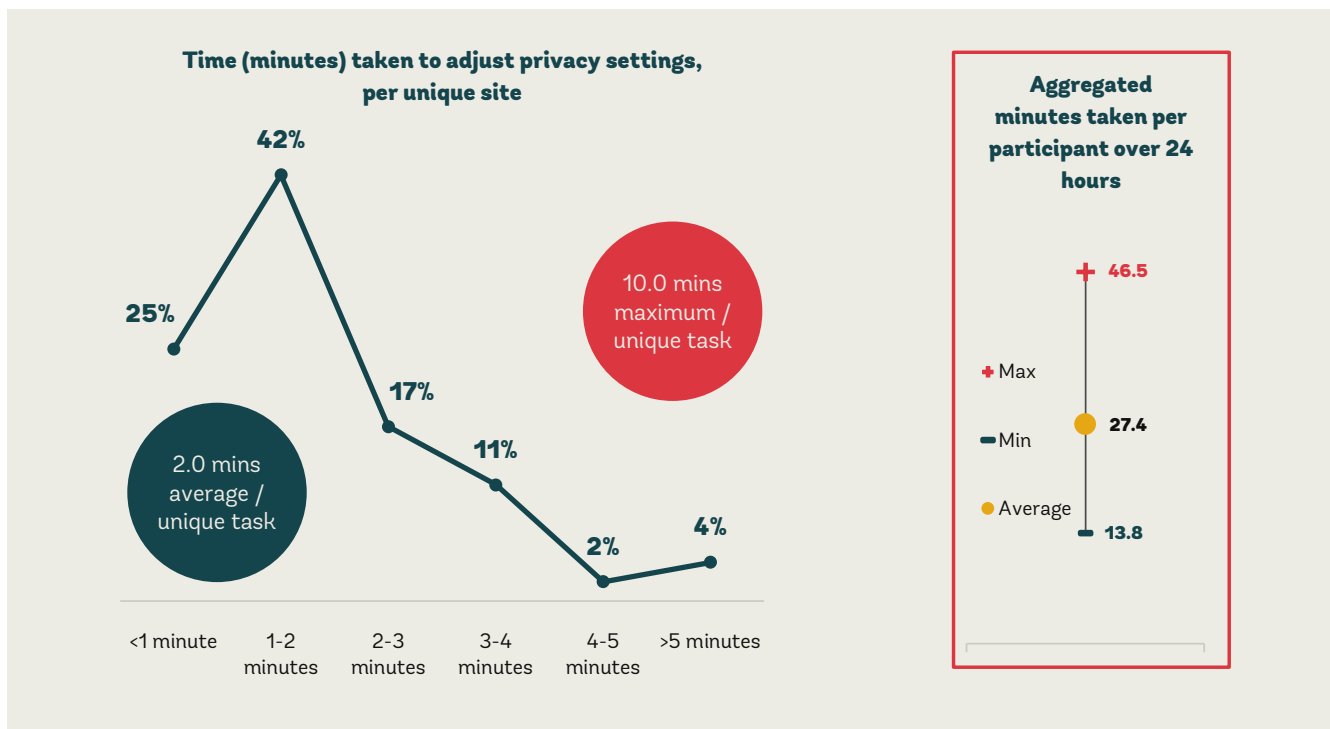


Figure 1. Time (in minutes) taken to adjust privacy settings
Base: All completed Australian responses, n=53 (excludes where no privacy settings existed)

Sites or apps that our participants found took the most time to find and then action a change to privacy settings included:

1. **Todoist**
2. **Gmail and Google** - with Google products and services appearing five times in the top 20 most complex sites for participants
3. **Binge**
4. **The Iconic**
5. **Mamamia**


One participant spent more than **45 minutes** in total over the 24-hour period to adjust their privacy settings across 18 sites / apps. In two out of five occasions, participants reported that adjusting privacy settings was frustrating and involved too many clicks (**42%**).

“There was no way to change the privacy settings on the website, even when logged on the account. The privacy policy provides a link to manage and opt-out of cookies and tracking but it goes to a non-relevant website on VPNs.”


Comment from sweep participant

Adjusting privacy settings – the struggle is real


On **45%** of occasions during the sweep, participants found it difficult to locate and adjust privacy settings of the sites and apps they were using. Participants reported difficulties adjusting the privacy settings for sites and apps in the following categories:



Health, wellbeing and personal interests



Entertainment (including streaming)



Gmail / Google services

Participants found sites and apps relating to health, wellbeing and general lifestyle including online shopping the most challenging to locate and adjust the privacy settings (i.e. **80%** of occasions participants noted some form of difficulty).

The following are some of the websites and apps where participants encountered the most difficulty adjusting their privacy settings:

- Noom app
- Samsung.com/au/
- Storypark app
- theage.com.au
- kayahealthclubs.com.au
- Mamamia app
- KX Pilates app
- Todoist app (and website)
- Instagram
- advoc8.co (Advoc8)
- Microsoft Outlook app

Many of these are online services that Australians use daily, often multiple times a day. Adding friction or obfuscating the option to adjust default settings not only degrades an individual’s online experience, but it can also impact their overall wellbeing and trust in these services.²

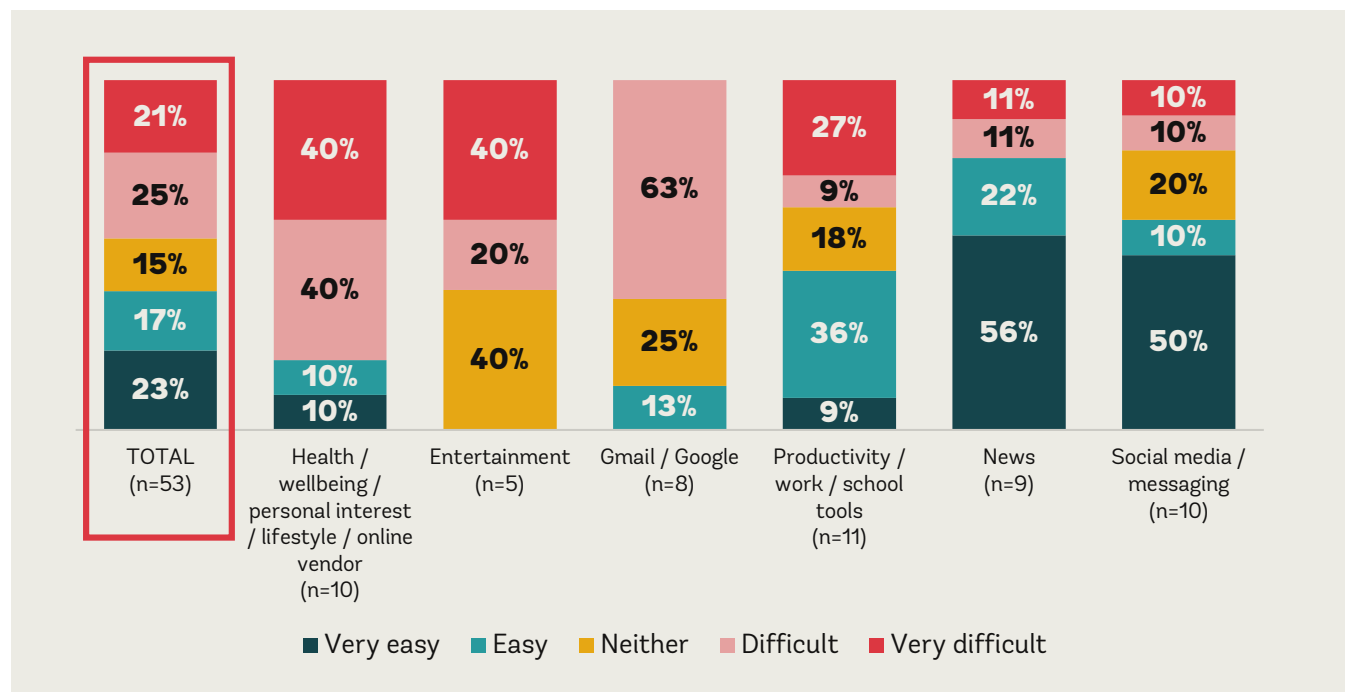


Figure 2. Ease of locating and adjusting privacy settings
 Base: All completed Australian responses, n=53 (excludes where no privacy settings existed)

² CPRC, 2022, *Duped by design – Manipulative online design: Dark patterns in Australia*, <https://cprc.org.au/report/duped-by-design-manipulative-online-design-dark-patterns-in-australia/>



At the completion of the 24-hour privacy sweep, participants were asked how they adjusted their privacy settings with eight out of the nine participants reporting that they adjusted the privacy settings to share less personal information. This is in line with CPRC's previous research which confirmed that less than 10% of Australians are comfortable with companies targeting them with advertising based on their online behaviour or personal characteristics.³ Australians largely do not want to be opted-in to data collection and sharing by default.

Even when participants adjusted the privacy settings, for more than half of the sites and apps participants engaged with, they noted that they were not confident that they had successfully adjusted the settings to mirror their preferences.

“Shocked at how laborious and time consuming it was to adjust privacy settings, and unsure if I did it correctly.”

“Have to adjust cookie settings in browser, not by site. Don't know how to do this. Every browser is different.”

“There was a page about cookies that indicated I could change settings for cookies but appeared to indicate this could only be done through a browser - wasn't clear where or how.”

“I have no idea if the settings changes were relevant and if they'll last.”

Comments from sweep participant

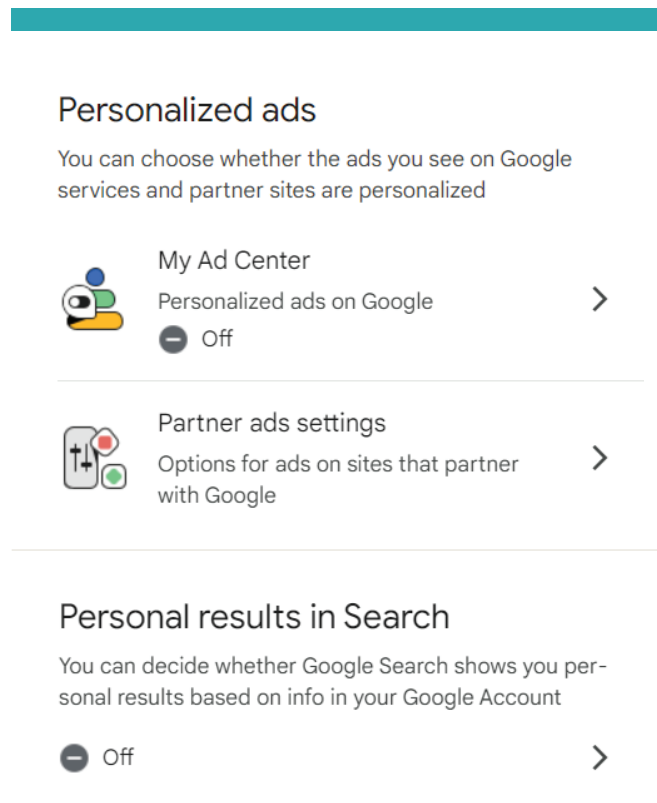
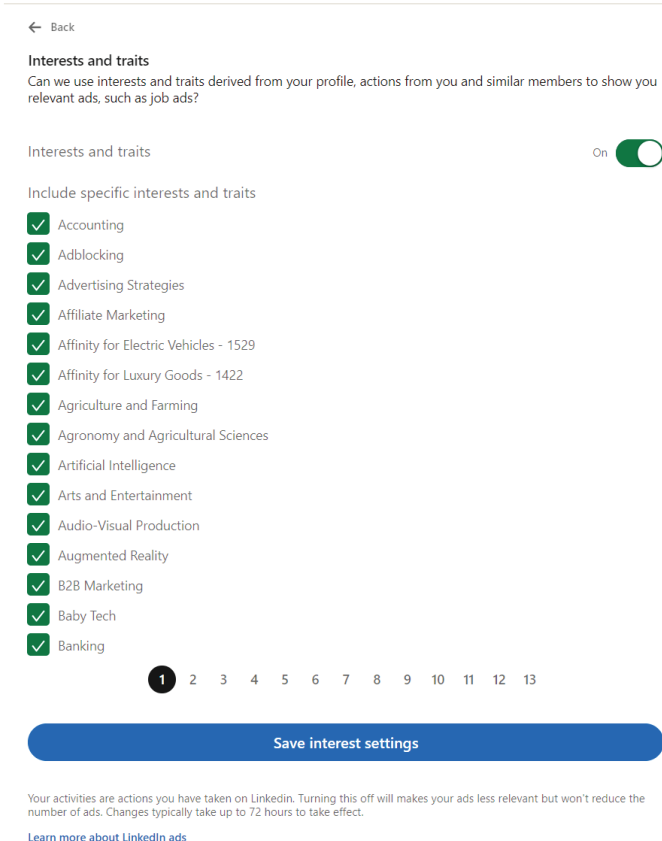


Figure 3. An example of one of multiple screens to manage privacy settings on LinkedIn and Google

³ CPRC, 2023, *Not a fair trade – Consumer views on how businesses use their data*, <https://cprc.org.au/report/not-a-fair-trade-consumer-views-on-how-businesses-use-their-data/>

Control is not genuine nor accessible

For more than a third of sites and apps participants visited, the option to adjust privacy settings was simply absent (37%). In these instances, the sites and apps are either relying on some form of notification (e.g. pop-up, information within their privacy policy) or requiring the individual to take action in another way (e.g. adjust browser settings or contact the organisation through email or mail).

In some cases, global websites and apps that adhere to stricter privacy protections in other jurisdictions did not apply those settings here in Australia. For example, the health and wellness program, Noom, confirmed that as the participant was located in Australia, the participant did not have the option to opt-out to having their personal information shared or sold (see first example below).

Below are some examples of the notifications that participants experienced.

Right to Opt-Out/Right to Limit Use and Disclosure of Sensitive Personal Information

You may have the right to opt-out from the "sale" or "sharing" of your personal information. As part of your use of our service, Noom may share information relating to you and your use of Noom to help deliver interest-based marketing and advertising to you outside of Noom. You may also have a right to limit our use of sensitive personal information for purposes other than to provide Noom. As a wellness service, the information we collect often pertains to your health.

If you do not wish for us or our partners to share information relating to you or your use of Noom for marketing and advertising purposes, please submit the form below.

It does not appear you are a resident of an applicable region. If you think this is an error, please email us at support@noom.com.

Cookie Preferences

Calm and its third-party advertising and analytics partners use cookies to provide a better experience for you. ✕
By using our site, you agree to the use of cookies as described in our [Privacy Policy](#).

Tracking Tools and Opt-Out

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, "Cookies") to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data— usually text files — placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, **the Services do not support "Do Not Track" requests sent from a browser at this time.**

Samsung and Cookies ✕

This site uses cookies to personalise your experience, analyse site traffic and keep track of items stored in your shopping basket. By Clicking ACCEPT or continuing to browse the site you are agreeing to our use of cookies. [See our Privacy Policy here](#)

Accept

We and **our partners** use cookies to personalize your experience, to show you ads based on your interests, and for measurement and analytics purposes. By using our website and services, you agree to our use of cookies as described in our [Cookie Policy](#). ✕

AA

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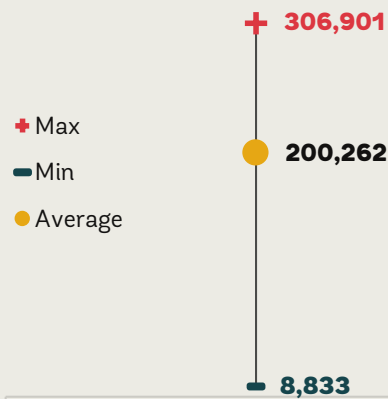
Figure 4. Examples of the 'take-it-or-leave-it' approach to privacy

Privacy policies - prepare yourself for some 'light' reading of 14 hours a day

The average word count of a privacy policy found during the sweep was **13,323**, equating to an average reading time of **56 minutes** per policy. The longest word count was found to be Microsoft's privacy policy recorded at **90,119 words**. Participants would have had to spend an average of **14 hours** to read privacy policies for all sites and apps they visited within the 24-hour period. The maximum total word count that was experienced during the sweep was **306,901 words**, equating to more than **21 hours** of reading time had the participant been required to read each of the privacy policies (and any associated cookie policies) they encountered.



Average, min and max aggregated words counted per participant over 24 hours



Average, min and max aggregated reading time required (mins) per participant over 24 hours

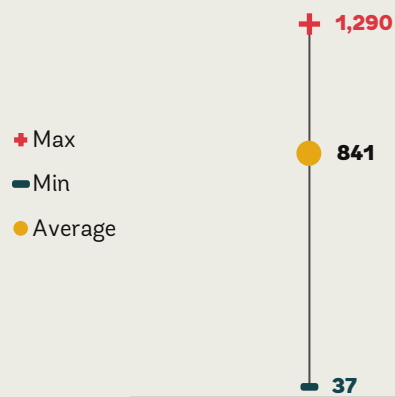


Figure 5. Word count and time taken to read privacy policies
Base: All completed Australian responses, n=89

The five longest privacy and cookie policies included:

1. **Microsoft** (90,119 words)
2. **Meta (including Facebook, Instagram, Messenger)** (36,759)
3. **Whatsapp** (15,280 words)
4. **New York Times** (12,962 words)
5. **X** (12,622 words)

Privacy policies were not only lengthy but were also deemed difficult to understand. For more than half of the apps and sites that the participants visited during the 24-hour period, they reported that the privacy policy did not look like it was easy to understand (52%).

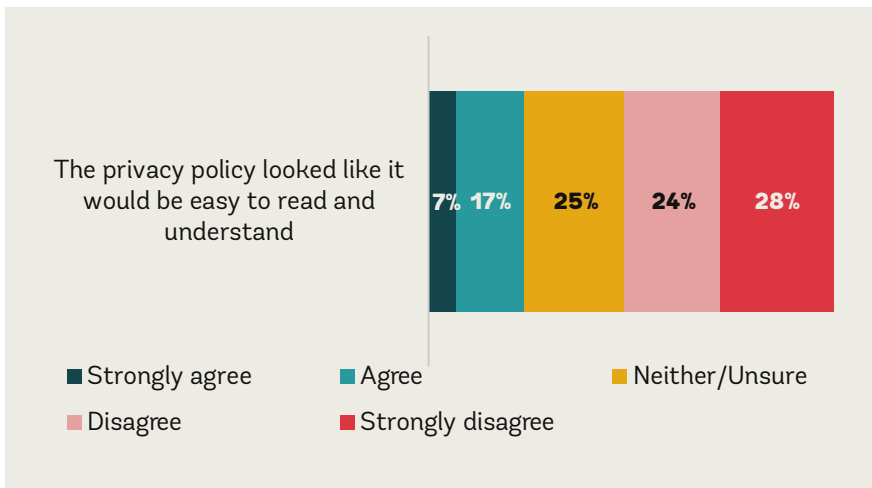


Figure 6. Ease of reading and understanding of privacy policies
Base: All completed Australian responses, n=89



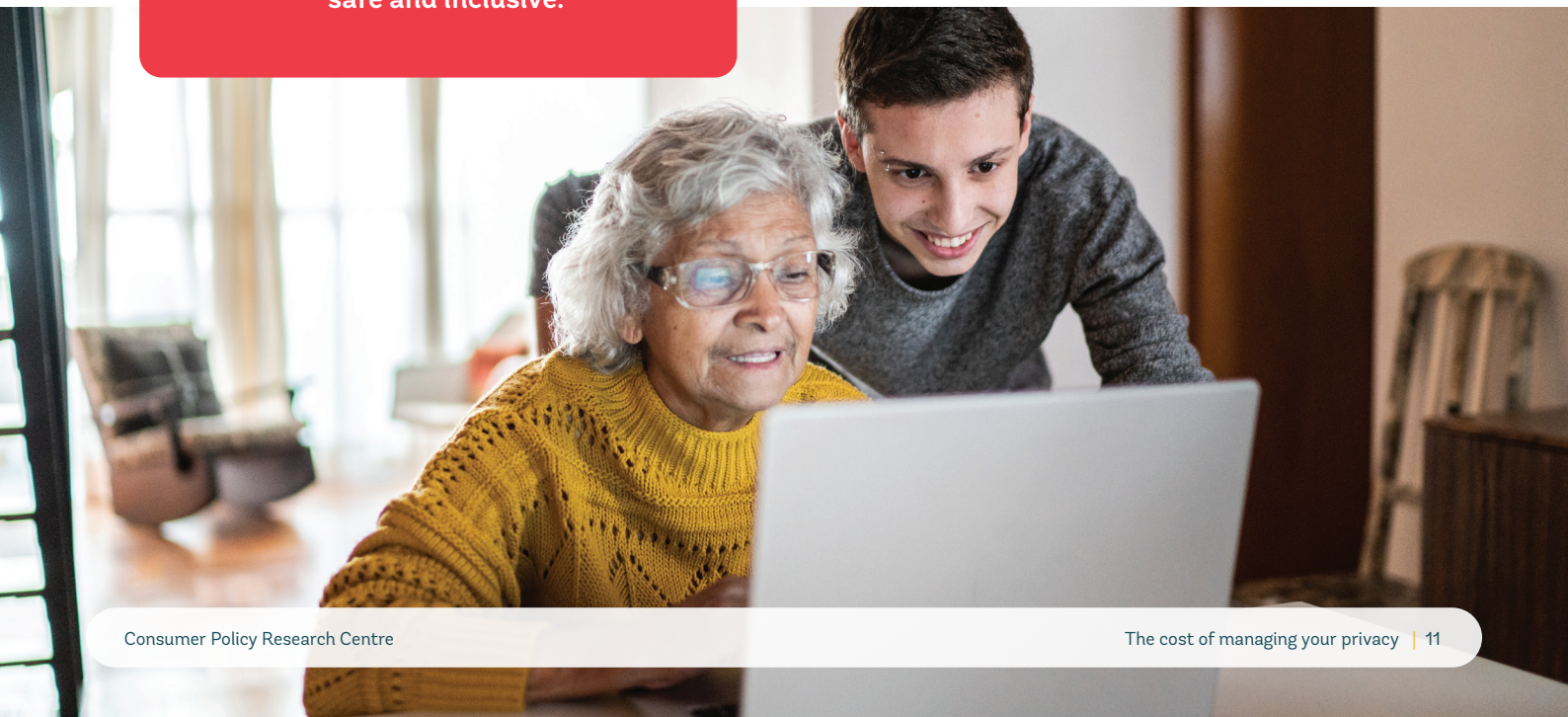
Why Australian privacy reforms must account for consumer burden

While businesses can easily quantify the cost of regulation that requires them to make changes to their data practices and business models, often cost-benefit analyses are silent on consumer burden or consumer harm. Individual Australians do not have the means nor the resources to account for what poor privacy protections are costing them. However, consumer research consistently highlights the mismatch between community expectations and current data practices.

This privacy sweep is yet another example of why privacy cannot be an accountability that rests solely on the shoulders of individual Australians. This is why CPRC continues to recommend to the Federal Government to take the following measures:

- **Modernise what it means to be identifiable** to cover information obtained from any source and by any means.
- **Implement genuine privacy by default measures** instead of placing the onus on consumers to opt-out of settings that are not designed with their interests in mind.
- **Require all businesses to assess** and ensure how they collect and use data leads to fair and safe outcomes that are in the interests of their customers and the community.
- **Empower and adequately resource the regulator** to swiftly ban or restrict harmful practices that cause direct and clear consumer harms.
- **Provide a clear pathway** for redress and support when things go wrong.

It's time that Australians deserve privacy protections that are fair, safe and inclusive.





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