

Remember that a **user-friendly notice** not only reflects user input and involvement, but also how much your company values its customers.

Plain Language

How to communicate the content clearly?

Start with a description of the purpose of the notice and the questions it will answer. This “heads up” to your readers tells why to read the notice. Remember, readers didn’t ask for your notice. It simply shows up in the mail. Chances are that they’ll read it if they know at the outset what’s in it for them.

Use informative headings that preview what follows. Where appropriate, let your customers know whether there’s an action step.

Notice language should be:

- concise – simple and straightforward, not “jargoned up” or “dumbed down.”
- direct – using the word “you” to engage your reader.
- affirmative – telling customers what is, rather than what isn’t; what they should do, rather than what they shouldn’t do.
- active rather than passive.
- respectful.

If you must use technical terms, you can still help your reader understand them.

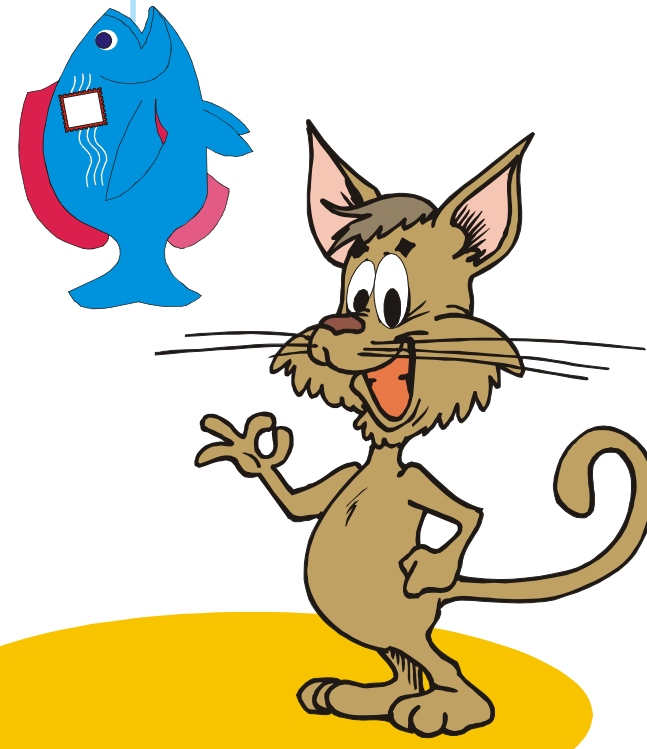
- define the term in a text box close to its use.
- include a glossary in the notice.
- on your website, hyperlink the term to a definition or use a simpler term or phrase in the text and link to the technical term.

Highlight your company’s contact information clearly and conspicuously.

Graphics

Create your notice with attractive and pleasing styles and formats. Consider:

- the typeface
 - 12 point preferable; at a minimum, 10-point type
 - serif fonts for paper
 - sans serif fonts for headings and Web
- the case: use upper and lower
- bold, italics or underlining for emphasis
- headings
- bullets or numbers
- color for interest
- graphics, symbols and text boxes



- indents to show subcategories of information or examples
- limiting the length of the document as well as individual paragraphs and sentences. Lengthy or dense-looking text is off-putting.
- appropriate use of white space between text and margins

For More Information

More information about effective communications tools and techniques, including the transcript of the GLB workshop and panelist materials on which this brochure is based, is posted at www.ftc.gov/glbworkshop.

Your Opportunity to Comment

The National Small Business Ombudsman and 10 Regional Fairness Boards collect comments from small businesses about federal compliance and enforcement activities. Each year, the Ombudsman evaluates the conduct of these activities and rates each agency’s responsiveness to small businesses. Small businesses can comment to the Ombudsman without fear of reprisal. To comment, call toll-free 1-888-REGFAIR (1-888-734-3247) or go to www.sba.gov/ombudsman.

* Board of Governors of the Federal Reserve System
Commodity Futures Trading Commission
Federal Deposit Insurance Corporation
Federal Trade Commission
National Credit Union Administration
Office of the Comptroller of the Currency
Office of Thrift Supervision
Securities and Exchange Commission

FEDERAL TRADE COMMISSION	FOR THE CONSUMER
1-877-FTC-HELP	www.ftc.gov

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GETTING NOTICED:

Effective
Writing \wedge Financial
Privacy Notices



Does Your Financial Privacy Notice...

- use legal jargon?
- give new meaning to dense, indecipherable text?
- contain lengthy, unnecessarily complex sentences with convoluted clauses, multiple punctuation marks, and incomprehensible polysyllabic verbiage?

Was Your Notice...

- “borrowed” from another company without regard for your privacy practices or your customers’ concerns or needs?
- written by a committee of lawyers?

Since 2001, the Gramm-Leach-Bliley (GLB) Act has required financial institutions to provide notices that explain their privacy practices and their customers’ rights. To be sure, many notices satisfy the basic legal requirement to explain obligations and rights accurately. But many notices seem to fall far short when it comes to providing explanations that are meaningful to the reader.

To help businesses create more useful privacy notices for their customers, several federal agencies* brought together a panel of communications experts to talk about effective communications tools and techniques. The consensus among the experts was that meaningful communication can enhance customer confidence and trust – and that the GLB notice requirement can offer an opportunity to make that happen.

Listen to their tips...



What Makes A Notice Effective?

An effective privacy notice includes:

- a customer-based process that invites and uses consumer feedback
- plain language that enables a short, simple, easy-to-read message
- graphics that make a notice attractive and inviting

I think I'll read this one!



Getting Started

Drafting an effective notice should be a “team” effort. Ask employees from the legal department **and** the marketing department, for example, to be involved in the process. Once you assemble the team members, make sure they review and understand your company’s information collection and sharing practices. Understanding how your company handles customers’ information is critical to ensuring that your notice is accurate.

Engage production personnel throughout so that you develop a format that is affordable and feasible for your company. Ask legal experts to review the drafts at each stage to make sure the notices are accurate and satisfy the requirements of the law.

Customer-Based Process

Keep in mind that many of your customers may not be familiar with privacy issues in general, and their privacy rights in particular. Many of them may not have read a privacy notice before. Involve them in the drafting process.

At a minimum, **test your draft** on people who were not involved in the creative process: ask for feedback from a wide range of people, from employees throughout your company and family members to independent consumer “focus groups.”

To refine your messages, **solicit feedback** from customers who have received a notice.