



Me2B Safe Spec for Respectful Technology Data Controller Questionnaire

Version 1.0

RTS WG

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VERSION	DATE	EDITORS	CONTRIBUTORS	DESCRIPTION OF CHANGES
0.1	9/17/21	L. LeVasseur	RTS WG	Draft
1.0	4/26/22	L. LeVasseur	RTS WG	Pulication version

This workbook contains the detailed findings for both a Website and Mobile App Pre-certification audit.

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Me2B CERTIFICATION APPLICATION QUESTIONNAIRE - WEBSITE OR APP

Note that this questionnaire assumes that the entity completing this information is the Data Controller.

QUESTION		WHY WE ASK	RANGE OF ANSWERS	VENDOR RESPONSE
1	Name of URL or app to be tested.	To know what you want tested.	text;	
INFORMATION SHARING PRACTICES				
2	Are you using the IAB's Transparency & Consent Framework?	Because the IAB's TCF has been found to be in breach of GDPR due to cross-company data sharing without the individual's permission. https://www.dataguidance.com/news/international-belgian-dpas-investigation-finds-iab-tcf	Yes / No	
3	A Does this website or app USE information that has been OBTAINED from 3rd party data brokers? If yes, please explain: - What Data? - From what Data Broker or source? - How is data used in your business and in this product or website?	Gathering information via 3rd party data brokers may be disrespectful. Some uses are acceptable, such as: We advocate that any information about a person be collected/stored under a Me2B "Marriage" directly between the Me ("data subject") and the holder of the information (data broker in this case).	Yes - with explanation of how all the data is used in the business and product/ No	
	B For each 3rd party vendor, what kind of privacy obligations are required (of you) as the recipient of the data?	Have you been passed the responsibilities of the original data collector?	Explanation.	
4	A Does this website or app either directly or indirectly SELL or SHARE information with data brokers? If yes, please identify what data is sold/shared to/with whom, and for what purpose. Please also identify which Me2B Commitments trigger selling/sharing data with data brokers.	We are unable to measure back-end data sharing and transactions.	Yes - with explanation of how all the data is used in the business and product/ No	
	B For each Data Broker receiving data from you, describe privacy requirements/obligations that you prescribe for the receiving entity. Do you require the receiving entity to pass that on to their receiving entities?	To ensure data sharing rules are preserved to downstream recipients of data.		
5	Please identify all Data Processors used in this app. Include name of Company, product/service name, and a brief description of what purpose the Data Processor serves. Organize response by Me2B Commitment; i.e. list Data Processors per Me2B Commitment.	As a Data Controller, you are responsible for the Data Processors used in your service.	For each Me2B Commitment state: List of Company / Product or Service Name / Purpose, where Purpose can be: To Provide This Service (Me2B Deal) / To Subsidize the Cost of This Service / Marketing - Profile building? [what does this mean to me?] / Fraud Prevention / Personalized Experience? / Government or Regulatory Requirements / Social Good or Altruistic purposes	
6	Please identify the analytics platform/technology used in your website or app. Include details on data collection purposes, with particular attention on data aggregation practices, and specific settings that preserve Data Subject privacy.	Some analytics platforms share data with advertising platforms; this is an unsafe form of analytics. Additionally, analytics can be used to uniquely identify and/or profile Data Subjects, which is unlawful under GDPR and CPRA.	Name of Analytics platform, Description of collection practices and settings.	
PERMISSION RECORDING PRACTICES				

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7		Do you use a standardized structure such as the Consent Receipt v1.1 (https://kantarainitiative.org/download/7902) to record permissions? Please identify which commitments use the standardized structure, and if the records are available to the individual/Me.	Because Consent Receipt is a relatively new, state of the art practice to record/share/audit permissions and we can't detect use through observation of the website or app.	Yes / No for each Commitment	
<p><i>For Questions 8-14, please respond if the website or app includes this type of commitment. If your website or app includes other commitments, please repeat question 14 as many times as you need for each additional commitment.</i></p>					
LOCATION COMMITMENT					
8	A	As the Data Controller, what happens when an individual disables location information sharing? Does the system remove the location history?	Disabling the "Location Commitment" should result in the location history being forgotten, including all downstream data processors, and location not being used or collected/correlated to the individual.	Description of system behavior.	
	B	How is location consent (granting and revocation) orchestrated with all of your Data Processors?	As a Data Controller, you are obligated to ensure consent enforcement throughout all Data Processors.	Description of how system automatically manages location consent between Data Controller and Data Processors.	
	C	How does your system ensure downstream Data Processors also remove location history when the individual disables location information sharing?	As a Data Controller, you are obligated to ensure consent management throughout all Data Processors	Description of the data deletion activity by Data Processors.	