The Privacy Policy Analysis Canvas

An Ethics Thinking Activity for Teaching Privacy Policy Insufficiency

The Problem

- Users rarely read privacy policies
- When they do: length, vagueness, incompleteness
- "Tabula Rasa" effect: users project expectations onto policies rather than reading what's actually there
- Yet, companies use them as their sole way to notify users

Our Solution

A structured canvas with two main approaches:

- Information Flow Analysis: Students annotate 5 policy excerpts using Contextual Integrity for completeness annotation and highlighting vague language for Ambiguity Analysis
- + 9 privacy practice dimensions covering stable and emerging practices

→ Reveals notice-based protection is insufficient

Method

✓ Designed for graduate privacy courses
✓ Available as digital (FigJam) or possible to carry out as an analogue activity
✓ Translated into 9 languages: Chinese, Dutch, German, Hindi, Japanese, Korean, Portuguese, Spanish
✓ Students work in pairs, in-person or remotely.
✓ Tested with 59 students analyzing 31 privacy policies
✓ Completable within a single class period or as homework

Key Findings

- Generative & Engaging:
  - All students completed the analysis within class time, with discussions continuing beyond the class period, and actively comparing their findings across policies.
  - "Odd Practices" section illuminating: Pixel tracking in emails, Voice emotion detection, Retention of "deleted" content.
- Trust shifts after analysis: Established tech (-0.51) vs. Emerging tech (+0.63) shows different privacy communication approaches, and 42% improvement in inter-annotator agreement demonstrates framework effectiveness.

Info

Hauke Sandhaus and Helen Nissenbaum. 2025. Work in Progress. Cornell Tech.

Canvas Template
figma.com/community/...

Read Paper

Contact Info
http://hauke.haus

Student Filled Template: Figma

Basic information about chosen privacy policy

HERE

Figma

Design Software

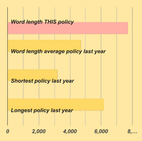
- 4 million registered users
- USA, California
- Figma is a collaborative design tool that enables real-time teamwork on interface design projects, streamlining the creative process for designers and teams

Fill in some overall stats, get an overview before diving deep.

Overall Stats

7710 words
Policy Length

09/27/2024
Policy Most Recent Update



Who is covered by this policy?

The privacy policy applies to all individuals who interact with Figma's Services, encompassing both registered and unregistered users of Figma's websites, mobile applications, APIs, design tools, and related online and offline offerings. This includes users who create Figma accounts, students using Figma for Education (including those under 13 with consent from their educational institution), job applicants, event participants, individuals who communicate with Figma (such as requesting information or subscribing to newsletters), and organizations or administrators who use Figma on behalf of an entity (like employers and team members). However, the policy does not apply to third-party websites, services, or applications accessible through Figma's Services, nor does it cover Figma's current employees and contractors, who are governed by a separate privacy notice.

What information types does the policy cover?

Figma collects a comprehensive range of personal and technical data to provide and enhance its Services. This includes information you provide directly and data collected automatically during your interaction with the Services.

#Name #Email_address #Phone_number #Mailing_address #Payment_card_information

#Billing_information #Communication_information #Candidate_information #Customer_content #names #voice_recordings #Usage_data #IP_address #MAC_address #Cookie_identifiers #Location_information #Browser_information #Device_information #Internet_service_provider #Pages_visited #Links_clicked #Interactions_with_Services #information_from_third_parties

Privacy Policy Structure

Figma's Privacy Policy outlines how personal information is collected, used, and disclosed when you interact with Figma's Services

1. About: Introduction to Figma and the purpose of the Privacy Policy.
2. Scope: This section covers the applicability of the policy and exclusions, such as third-party services, employees, and contractors.
3. Data Collected: Figma collects data provided by you—like account information, payment details, communications, and content you create. It also collects data automatically, such as technical data, cookies, and usage analytics, and receives data from other sources, including organizations and third parties.
4. Data Use: The collected data is used to provide and improve Services, communicate updates, manage operations and security, and comply with legal requirements.
5. Data Sharing: Information may be shared with other users and the public if you share content, as well as with service providers, partners, or for legal reasons and business transfers.
6. International Transfers: Data may be transferred internationally with appropriate safeguards in place.
7. Privacy Frameworks: Figma complies with EU-U.S., UK, and Swiss-U.S. data privacy frameworks to protect your information.
8. Your Choices: You have options regarding opt-outs, communication preferences, cookie settings, and advertisement preferences.
9. Your Rights: You can access, correct, or delete your data, and the policy explains how to exercise these rights.
10. Data Retention: Details are provided about how long your data is kept and the practices for data deletion.
11. Security: Information about data protection measures implemented by Figma.
12. Third-Party Links: The policy clarifies that it doesn't cover external websites or applications.
13. Supplemental Notices: Specific rights for California residents under the CCPA and for Nevada residents under state law are outlined.
14. Children's Information: Policies concerning users under the age of 13 and parental rights are discussed.
15. Contact Info: The policy provides details on how to reach Figma for questions or to exercise your rights.

The privacy policy is presented on a single page on Figma's website. Supplemental Privacy Policy for Children is included at the end of the policy. Relevant links provided within the policy:

- Figma's Terms of Service
- List of Third-Party Subprocessors
- AI Features Information
- [Cookie Consent Tool](Accessible by clicking "Manage cookies" in the footer of Figma's website)

Information flow analysis

Select 5 information flows in the policy and annotate them for vagueness and completeness

Legend:
Completeness: [Subject] [Sender] [Recipient] [Attribute/Information Type] [Transmission Principle]
Vagueness: [**Vagueness**]

Vagueness (in bold)

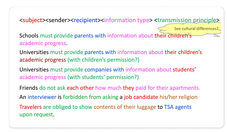
Reidenberg et al. "Ambiguity in Privacy Policies and the Impact of Regulation".



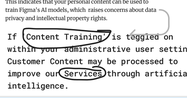


Completeness (in colors)

Shvartzshnaider et. al. "Going Against the (Appropriate) Flow: A Contextual Integrity Approach to Privacy Policy Analysis".



Note: Helena slides and the paper do not use the same color scheme



1. We **may** collect personal information when you register on our platform, **such as** your name, email address, and billing information
2. We **may** share your data with **certain** third-party service providers to improve our platform's functionality.
3. We retain personal data **for as long as it is necessary** to provide our services and comply with legal obligations.
4. You **may** request access, modification, or deletion of your personal data by contacting our support team.
5. Personal data **may** be transferred to and stored in countries that have different data protection laws.

Incomplete Flows:
Out of the five flows, one flow (Data Retention) is incomplete as it is missing the recipient. The other flows have all parameters either explicitly or implicitly mentioned, with subjects implied where appropriate for context.

CI Parameter Bloating:
The flow "You may request access, modification, or deletion of your personal data" has CI parameter bloating, as it includes three different attributes ("access, modification, or deletion") without clearly distinguishing how they relate to each other.

Vague Flows:
All of the flows are vague as they contain terms like "may" or "as necessary," which introduce ambiguity into the statements.

Trust Data Use Before Privacy Policy Analysis



Example filled in by:

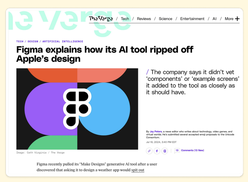


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Description of Brand / Product Image

Share

Figma is a cloud-based design and prototyping tool renowned for its robust features that enable real-time collaboration among designers and teams. It's widely used for interface design, allowing multiple users to work simultaneously on the same project, which enhances efficiency and creativity in the design process. Regarding data usage, safety, and privacy practices, Figma stores user projects and data on its secure servers to facilitate seamless collaboration.
Figma complies with international data protection regulations such as the GDPR and the California Consumer Privacy Act (CCPA).Figma employs enterprise-grade security measures, including data encryption and compliance audits, to protect user information. Recently, Figma announced plans to train AI models using customer data, with options for enterprise customers to opt out of content data training. This move has raised some concerns about data privacy, particularly regarding the de-identification of sensitive information. Overall, Figma's brand image in terms of data privacy is one of diligence and transparency, although the introduction of AI training has prompted discussions on privacy implications.



Link to Privacy Policy

Link to Product

Detailed privacy policy analysis

Collection Practices

1. Information collected way
Figma collects information both directly and indirectly from users.

Directly: gathers data when users create accounts, provide payment details, communicate with the company, apply for jobs, participate in events, or upload content.
Indirectly: automatically collects technical information like IP addresses, device details, browser types, and user interactions through cookies, pixel tags, web beacons, and may also receive data from organizations or third-party services based on user privacy settings.

Rajshri

2. Data inferred
Yes, the policy mentions that Figma may draw inferences from the personal information collected to create a profile about a user's preferences or characteristics as they relate to the Services.

Specifically, under the categories of personal information collected, it lists **"inferences drawn from other personal information to create a profile about a consumer"**. This implies that Figma analyzes the data to understand user behavior and preferences, which can be used to enhance and personalize the user experience within their Services.

Rajshri

3. Information collection
Information is collected when users **voluntarily provide it**, such as during account creation, payment processing, communication with Figma, job applications, or participation in surveys and events. It also collects data **automatically when users interact with the Services**, including visiting the website, using the app, or engaging with content, which involves technical and usage data. Additionally, information may be collected from **third parties when users access the Services through other platforms** or when organizations provide user information to facilitate account provisioning.

Rajshri

4. Location Tracking
Yes, Figma collects **location information inferred from users' IP addresses.** When users interact with the Services, Figma automatically gathers technical data, including **IP addresses**, which can be used to approximate the user's geographic location.

This information provides a general idea of the user's location based on their internet connection but is not as precise as GPS data.

The policy does not indicate that Figma collects more detailed location information, such as GPS coordinates or real-time location, unless explicitly provided by the user.

Rajshri

Third Party Practices

1. Transmission principles
Yes, Figma's privacy policy specifies conditions under which it collects information from third parties. The policy states that if users access the Services on behalf of an organization (e.g., their employer), **"that organization may provide us with information about you so that we can provision your account."** Additionally, if users access Figma through a third-party service, **"we may collect information about you from that third-party service that you have made available via your privacy settings."** These conditions outline that Figma collects third-party information when it is necessary to provide Services or when users have consented via their privacy settings on other platforms.

Rajshri

2. Site visitors
The privacy policy does not specify exact details of the information collected about site visitors from third parties. It mentions that Figma may obtain information that users have made available via their privacy settings on third-party services. This could potentially include profile information such as **name, email address**, and other personal details, but the policy states, **"we may collect information about you from that third-party service that you have made available via your privacy settings,"** without listing specific data types.

Therefore, while Figma does collect information from third parties, the exact types of information are not explicitly detailed in the policy.

Rajshri

3. Third parties specified
While Figma's policy mentions certain companies like **Google** for analytics services (e.g., "We use Google Analytics and other service providers to collect and process analytics information on our Services") and others like Arkose Labs, Zendesk, Statsig, and Shopify as service providers, it does not provide an exhaustive list of all third parties from whom it collects user information.

The policy refers generally to **"third-party services and organizations"** from which Figma may obtain information, especially when users access Figma through such services.

It focuses more on categories of third parties rather than specifying all entities by name.

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Sharing Practices

Yes, Figma discloses information to third parties as outlined in their privacy policy.

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Figma collects information such as your name, email address, and other profile details from third parties like organizations you belong to or third-party services you've connected with, based on your privacy settings.

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Figma shares data with other users of its Services, the public (if content is made public), service providers, your organization and administrators, community creators, third-party platforms and services (with your consent), advertising partners, and as necessary for legal reasons or business transfers.

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Shared information may include personal details like your name, email address, profile information, content you create, technical data such as IP address and device information, usage data, and interactions with the Services, depending on the context and the third party involved.

Rajshri

Yes, Figma shares location information inferred from your IP address with third-party advertising partners for purposes like delivering targeted advertisements; this is done through technologies like cookies and tracking tools.

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The policy details that data is shared with various parties for purposes like providing services, facilitating transactions, and legal compliance. Under the California Consumer Privacy Act (CCPA), Figma acknowledges that certain uses of data, such as for targeted advertising, may be considered a "sale" or "sharing" of personal information.

Rajshri

Data Retention

Can users easily delete their data? How?

Yes, users can request the deletion of their personal information by contacting Figma through the methods outlined in the "Contact Us" section of the privacy policy. Deleting your personal information will require you to delete your account, as Figma needs your information to maintain and provide the Services.

Hauke Sandhaus

How long is the information held; is it ever deleted/destroyed?

Figma retains personal information for as long as necessary to fulfill the purposes for which it was collected, provide the Services, and comply with legal obligations. When there is no ongoing legitimate business need or legal reason to process your data, Figma will delete or anonymise it, or securely store it until deletion is possible.

Hauke Sandhaus

Can users move their data?

Yes, users have the right to data portability. You can request access to or a copy of your personal information, or ask Figma to send that information to another company, by contacting them as specified in the "Your Privacy Rights" and "Contact Us" sections of the privacy policy

Hauke Sandhaus

Policy Scope

Yes, Figma's privacy policy can change, and visitors are notified of material changes as required by applicable law, typically through updates posted on the Services or via email notifications.

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If Figma is involved in a merger, acquisition, or sale, personal data may be transferred to the buyer or successor entity as part of the business assets.

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Yes, the policy grants specific rights to individuals based on their location or citizenship, such as rights under the GDPR for EEA and UK residents and the California Consumer Privacy Act for California residents.

Rajshri

These rights are provided through supplemental notices in the policy and are only applicable to people in those locations, ensuring compliance with regional data protection laws.

Rajshri

Yes see how...

6. INTERNATIONAL DATA TRANSFERS

Your personal information is processed by or transferred to, processed and stored in different countries where data privacy laws may be different from the laws where you are located. In some cases, may not be as protected, and may be subject to access requests from governments, courts, or law enforcement in those jurisdictions according to applicable laws. We take steps to safeguard your personal information in accordance with the requirements of applicable laws.

Specifically, all personal information we process is transferred to, processed and stored in the United States, where our headquarters and our main servers are located. Our group affiliates and our third-party service providers and partners operate in the geographies identified on https://www.figma.com/sub-processors/. This means that when we collect your personal

Consent Process

1. Opt out of processes
Yes, Figma's policy allows users to opt out of certain data processing practices while continuing to use the service. Users can **opt out of marketing emails** by clicking the unsubscribe link found in those emails. They can adjust their **cookie preferences** to control data collection for interest-based advertising by accessing the **"Manage cookies"** link on the website. Users may also manage their **AI features and content training settings**. However, some essential communications and data processing necessary for providing the Services cannot be opted out of.

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2. Consent Obtained
Consent is obtained when users **voluntarily provide personal information** during activities like account creation, using specific features, or agreeing to terms and conditions. The policy states that where processing is based on consent, users have the right to **withdraw their consent at any time** without affecting the lawfulness of prior processing. Consent can be revoked by contacting Figma as detailed in the **"Contact Us"** section of the policy, or by adjusting settings such as **email preferences, cookie settings, and AI feature management**. Renewal of consent is implied when users continue to use the Services **after** updates to the policy, but users are encouraged to review any changes notified to them.

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Transparency

No, Figma's privacy policy does not use visual aids to enhance its explainability. The policy is presented entirely in text form, utilizing clear headings and subheadings to organize the content. While it employs formatting elements like bold text and bullet points to improve readability, it does not include any images, charts, or diagrams to visually represent information.

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Yes, the policy provides users with guidance on understanding and accessing their specific data. In the "Your Privacy Rights" section, it states that users have the right to request access to the personal information Figma holds about them, including obtaining a copy or requesting deletion. Users can exercise these rights by contacting Figma through the methods outlined in the "Contact Us" section. However, the policy does not mention direct links to websites where users can view their profile information or a simple data takeout feature; instead, users must reach out to Figma to request such information.

Rajshri



Not really but they have a page that shows how they encrypt

Use Practices

1.Providing and Managing the Services:
- Facilitating account creation.
- Processing payments.
- Enabling collaboration features among users.

2.Communicating with Users:
- Sending updates about accounts.
- Providing security alerts.
- Informing about changes to policies or terms of service.

3.Improving Services through Artificial Intelligence:
- Processing Usage Data.
- Processing Customer Content (if users opt in via their settings).
- Enhancing features and functionality.

Rajshri

Yes, the policy states that Figma may use your data for training AI models. Specifically, under "Improving our Services through artificial intelligence," it mentions processing your Usage Data and, if **"Content Training"** is toggled on within your user settings, your Customer Content. Figma indicates that they take steps to de-identify and aggregate data to protect user privacy during this process.

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'Odd' Practices

Recording calls or video conferences may capture sensitive information, and users should be aware that these interactions are being recorded..

We may record telephone calls or video conferences between you and our representatives for training or quality assurance purposes

This admission is significant because it affects your rights under CCPA, and you may want to opt out of such data practices.

Under the California Consumer Privacy Act (CCPA), Figma acknowledges that certain uses of data, such as for targeted advertising, may be considered a "sale" or "sharing" of personal information.

We may disclose your information to competent law enforcement bodies, regulatory and government agencies, courts or other third parties if we believe doing so is required or appropriate

This broad clause allows Figma to share your data without your consent under various circumstances, which may be a concern for privacy-conscious users.

This indicates that your personal content can be used to train Figma's AI models, which raises concerns about data privacy and intellectual property rights.

If Content Training is toggled on within your administrative user settings, Customer Content may be processed to improve our Services through artificial intelligence.

Highlights the risk of unintended public exposure of your personal information if content is shared publicly, affecting your privacy

Content can be made publicly available by you or others collaborating on it, and in such cases any information about you included in such content is also publicly available and can be indexed by search engines

Trust After Privacy Policy Analysis



After analyzing Figma's privacy policy, I have a moderate to high level of trust in it due to its comprehensive and transparent nature. However, certain practices like using customer content for AI training and sharing data with third parties might warrant users' attention and consideration.