How to Talk to Your Customers About Their Privacy Requests

ETHYCA®

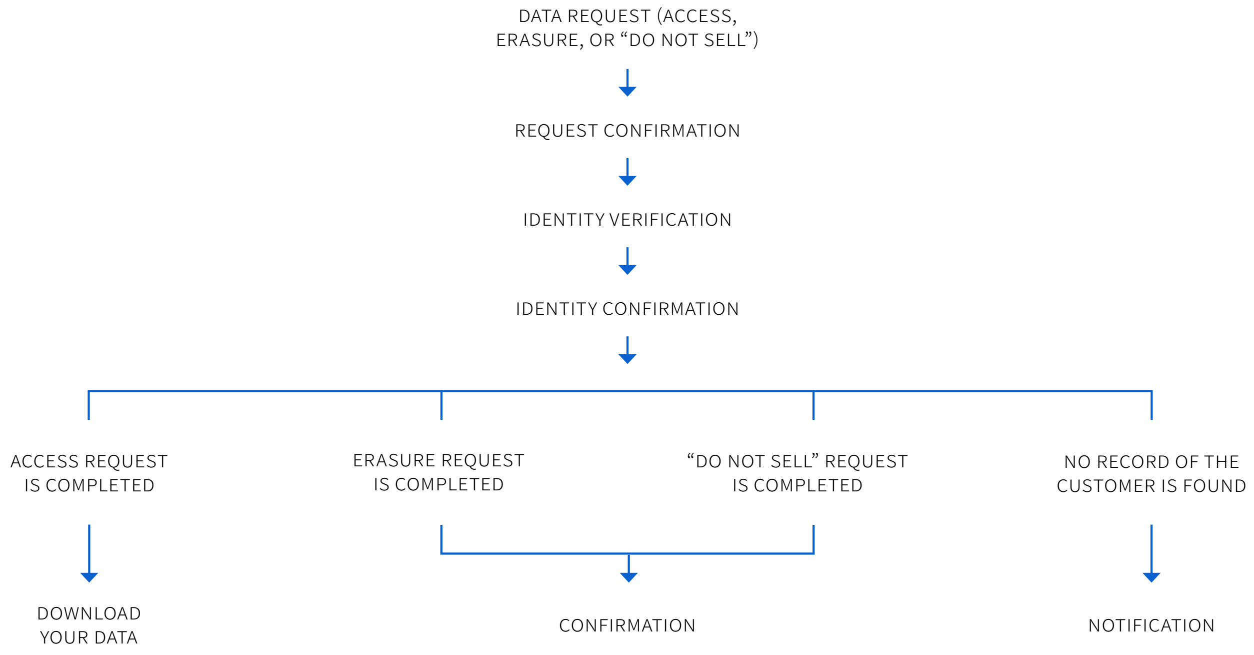
The Value of Good Privacy Communication

Now that laws like the California Consumer Privacy Act (CCPA) are in effect, D2C brands all over the United States are obligated to honor certain basic privacy rights for their customers. Whether it's a "Do Not Sell My Data" request or a request to download or delete data, a common question businesses come to us with is: "what do we say to our customers when they ask about their data privacy rights?"

In our work with D2C brands like Away, Parachute, and more, we've found that mastering the basics of privacy communication is an important first step for confronting CCPA and GDPR requirements. The content of the email templates we use in our own processing workflows are valuable for any team, whether they employ an automated privacy solution or not.

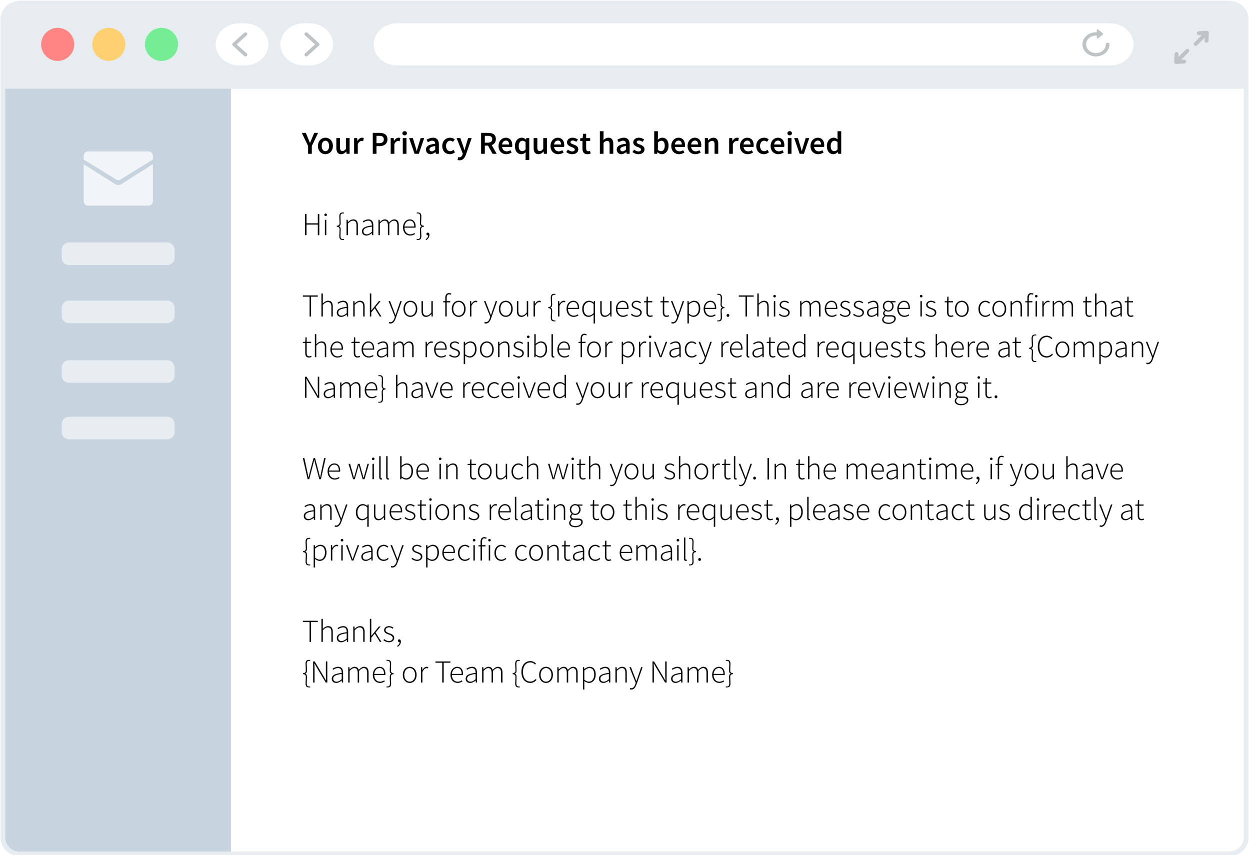
First, let's take a look at the sequence of communications that take place for various privacy requests. Then we'll get into the templates—you only need to build them once and they're good to re-use.

EMAIL SEQUENCING FOR PRIVACY REQUESTS


DATA REQUEST (ACCESS, ERASURE, OR "DO NOT SELL")
REQUEST CONFIRMATION
IDENTITY VERIFICATION
IDENTITY CONFIRMATION
ACCESS REQUEST IS COMPLETED
ERASURE REQUEST IS COMPLETED
"DO NOT SELL" REQUEST IS COMPLETED
NO RECORD OF THE CUSTOMER IS FOUND
DOWNLOAD YOUR DATA
CONFIRMATION
NOTIFICATION

Confirmation of Request

Here’s a template you can use to officially confirm to the customer that their privacy request has been received:



Your Privacy Request has been received

Hi {name},

Thank you for your {request type}. This message is to confirm that the team responsible for privacy related requests here at {Company Name} have received your request and are reviewing it.

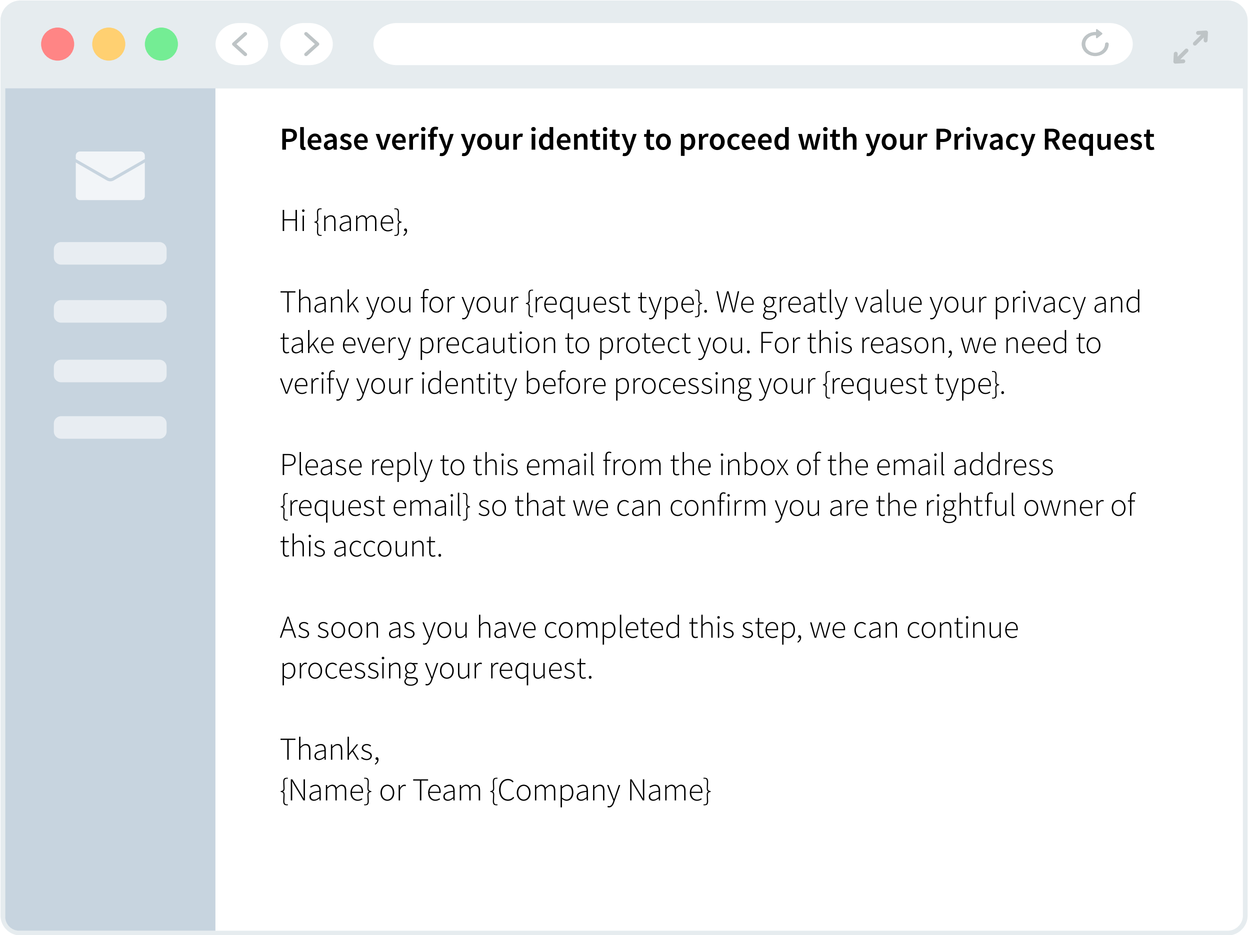
We will be in touch with you shortly. In the meantime, if you have any questions relating to this request, please contact us directly at {privacy specific contact email}.

Thanks,
{Name} or Team {Company Name}

Identity Verification – Device/Inbox

The first step you'll need to take before actioning any privacy request is verifying the identity of the customer making the request. It may be obvious, but sharing personal information with someone who isn't the correct customer is a serious no-no. The only way to be sure that the requestor actually has the right to access, edit, or delete their data is to confirm their identity. We break down the pros and cons of identity verification methods in this Ethyca Knowledge Base tutorial. Let's take a look at templates for different methods.

The following message should be used to verify the customer has ownership/access to the inbox or device associated with the identity for which they have made the subject request:



Please verify your identity to proceed with your Privacy Request

Hi {name},

Thank you for your {request type}. We greatly value your privacy and take every precaution to protect you. For this reason, we need to verify your identity before processing your {request type}.

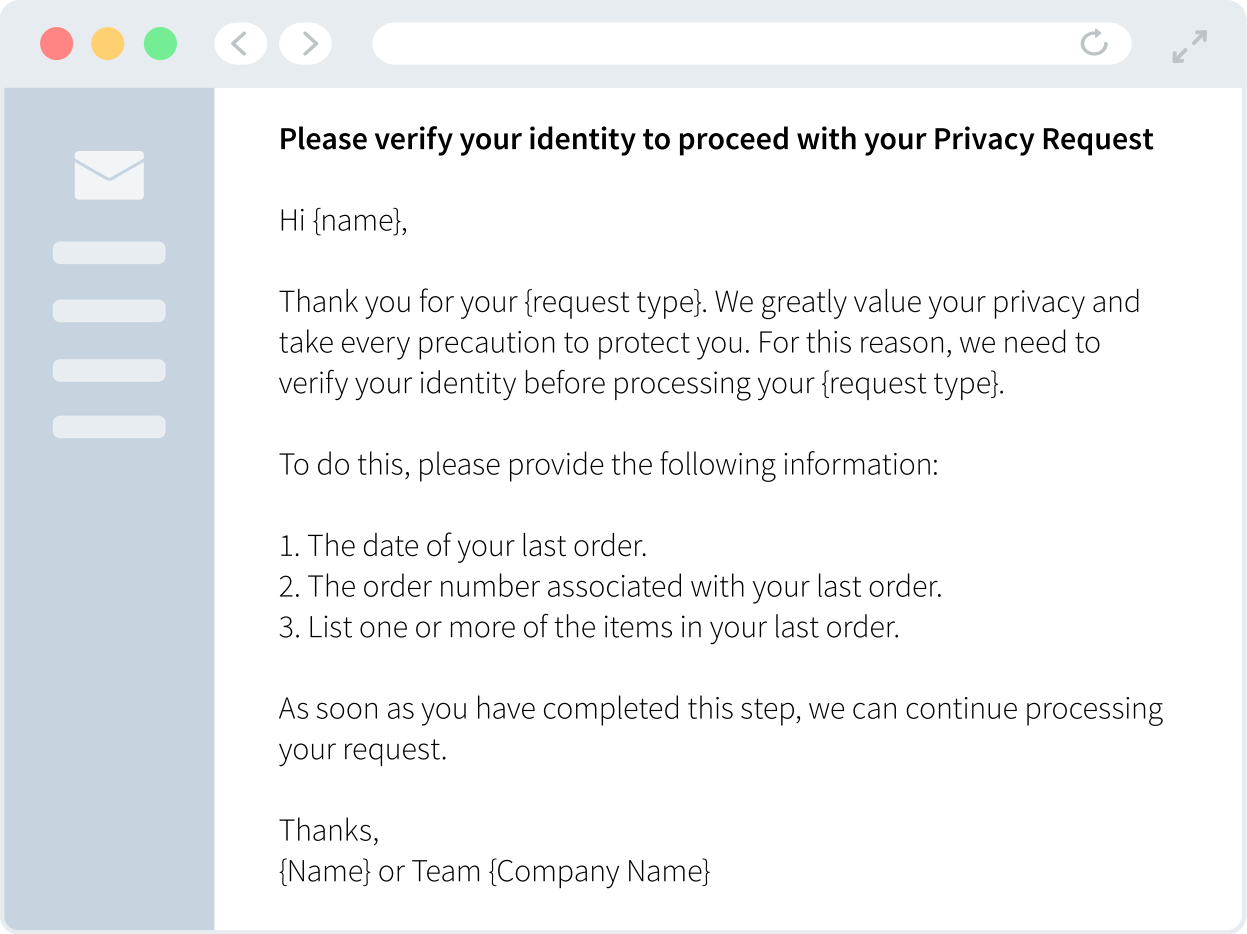
Please reply to this email from the inbox of the email address {request email} so that we can confirm you are the rightful owner of this account.

As soon as you have completed this step, we can continue processing your request.

Thanks,
{Name} or Team {Company Name}

Identity Verification – Known Points of Information

If the business feels greater caution than Inbox Verification is necessary, a set of fixed questions may be asked to verify information the business already knows about the customer. For example, as an e-commerce business, you might ask the customer to confirm the date of their last order, the order number, and the dollar value.



Please verify your identity to proceed with your Privacy Request

Hi {name},

Thank you for your {request type}. We greatly value your privacy and take every precaution to protect you. For this reason, we need to verify your identity before processing your {request type}.

To do this, please provide the following information:

1. The date of your last order.
2. The order number associated with your last order.
3. List one or more of the items in your last order.

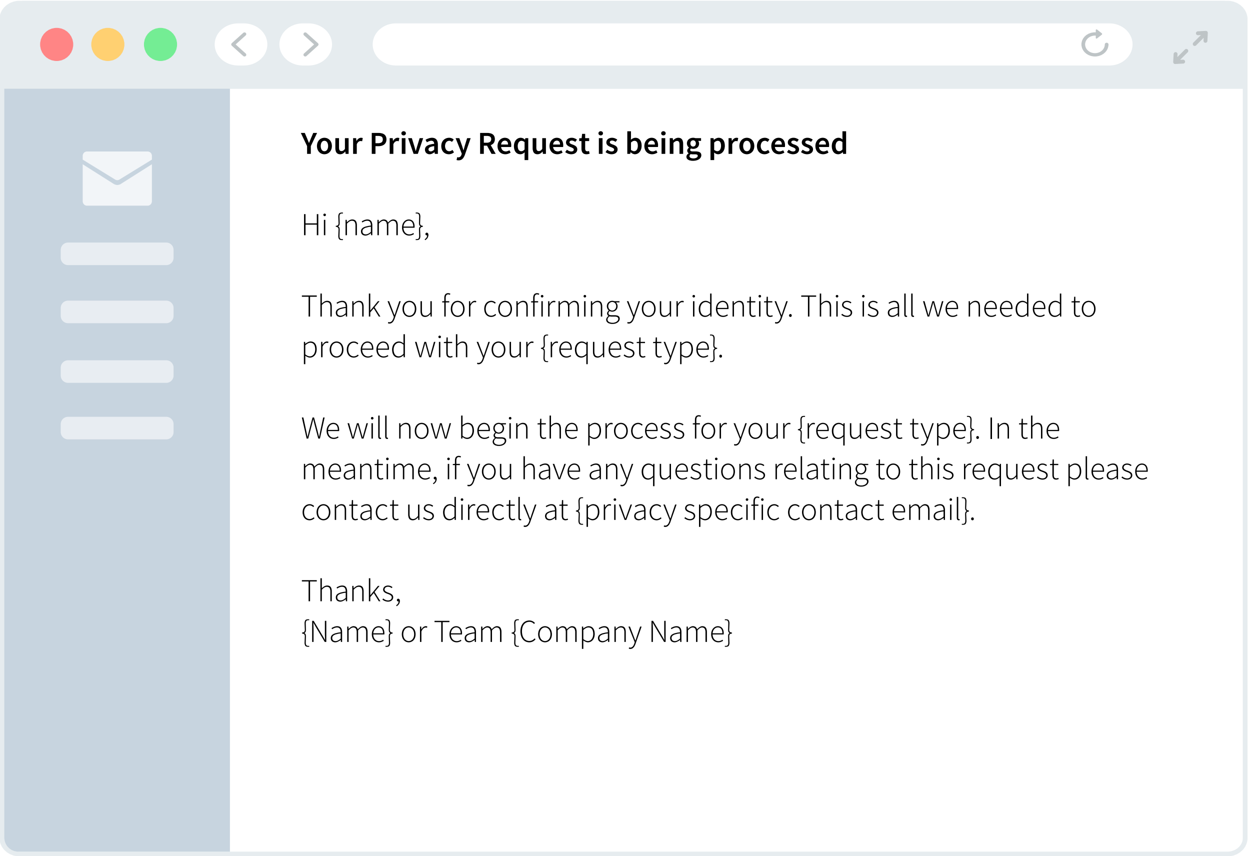
As soon as you have completed this step, we can continue processing your request.

Thanks,
{Name} or Team {Company Name}

> *You can also use standard multi-factor authentication for verifying user identity; this will usually involve paying for an off-the-shelf 2FA solution. Your team should be able to use the two methods here without needing third-party help.*

Confirmation of Identity

Use this template to confirm successful identity verification and that processing will continue:



Your Privacy Request is being processed

Hi {name},

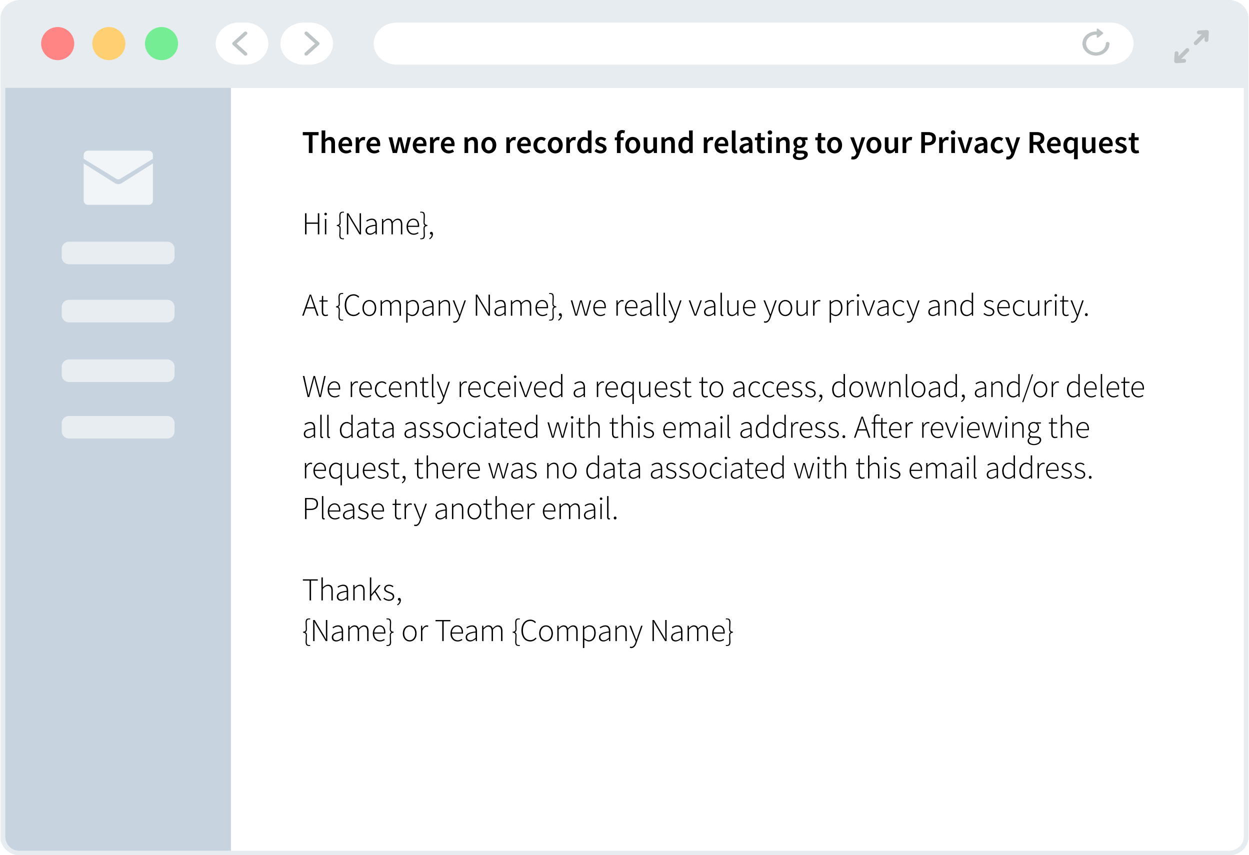
Thank you for confirming your identity. This is all we needed to proceed with your {request type}.

We will now begin the process for your {request type}. In the meantime, if you have any questions relating to this request please contact us directly at {privacy specific contact email}.

Thanks,
{Name} or Team {Company Name}

No Records Found

Sometimes, when a customer makes a privacy request, your company won't have any personal data associated with their identity. In this case, use the below template to inform them, and suggest they try using another email address if they believe that they have PII linked to an email address with your company.



There were no records found relating to your Privacy Request

Hi {Name},

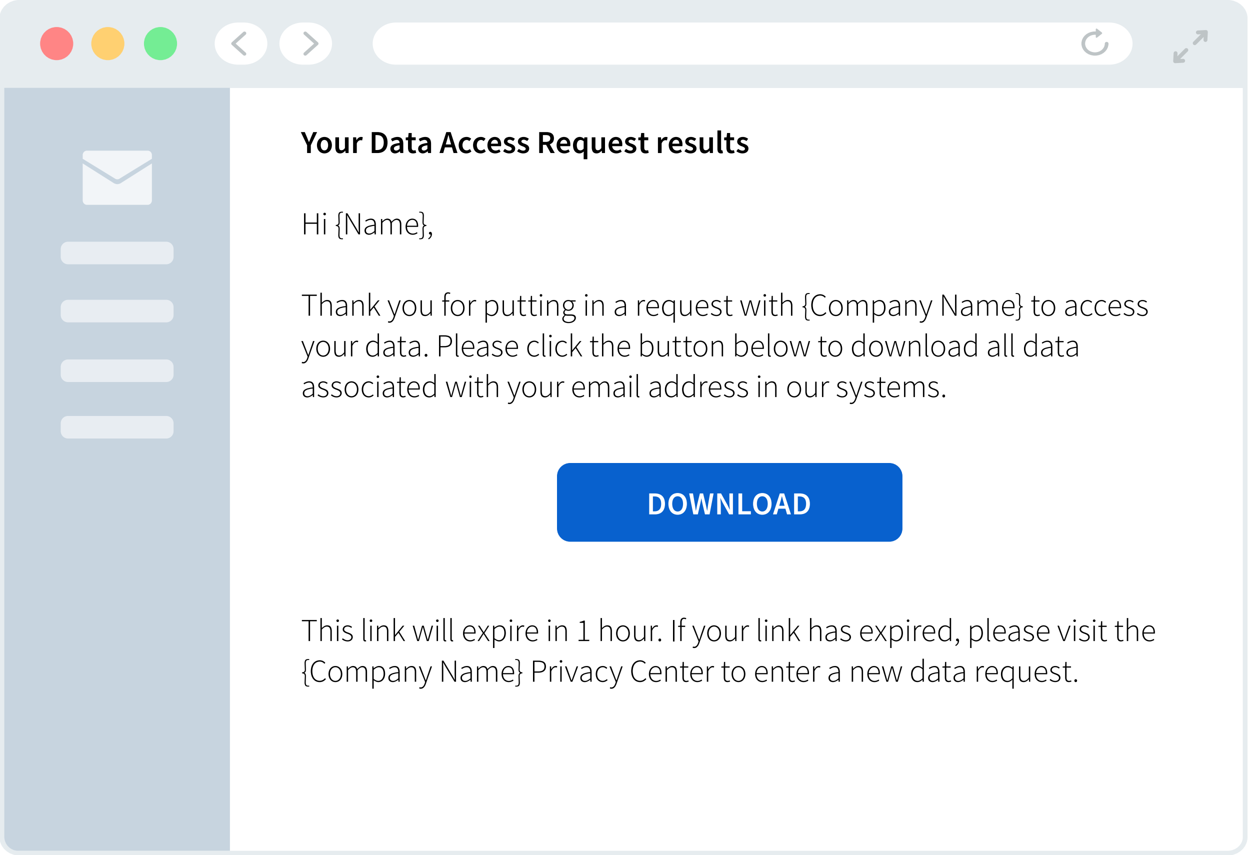
At {Company Name}, we really value your privacy and security.

We recently received a request to access, download, and/or delete all data associated with this email address. After reviewing the request, there was no data associated with this email address. Please try another email.

Thanks,
{Name} or Team {Company Name}

Results of Your Request – Access

Use this template to provide the results of a Data Access Request to the requestor. The download link should contain a file of data records that represent the totality of PII held by your company and associated with this person's identity. Per GDPR and CCPA guidance, these records should be formatted in a way that's understandable to the average user.



Your Data Access Request results

Hi {Name},

Thank you for putting in a request with {Company Name} to access your data. Please click the button below to download all data associated with your email address in our systems.

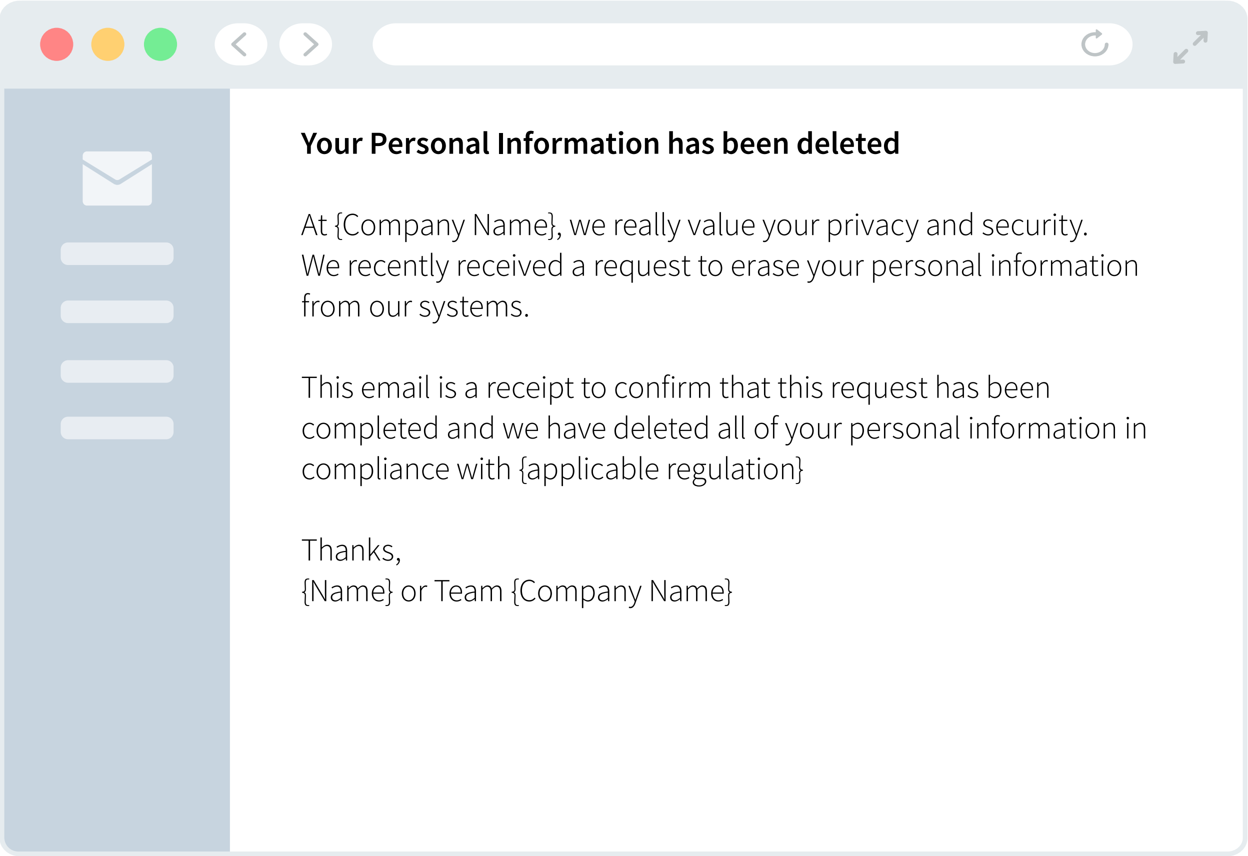
DOWNLOAD

This link will expire in 1 hour. If your link has expired, please visit the {Company Name} Privacy Center to enter a new data request.

> *Pay attention to the format you use to share user data for these requests. Per the "Right to Portability," GDPR and CCPA require data to be shared with users in a format "without hindrance" — so spitting out a data dump without attention to presentation isn't enough to satisfy legal requirements.*

Results of Your Request – Erasure

Use this template to confirm that an erasure request has been completed. Erasure requests are complex, and rarely so simple as a “hard delete”—we break down a little more about the considerations that need to be taken in this Ethyca Knowledge Base tutorial. The template below will suffice to inform the customer that they are erased from your systems. You’ll also need to set up a mechanism to ‘forget’ their email address once this has been sent.



Your Personal Information has been deleted

At {Company Name}, we really value your privacy and security. We recently received a request to erase your personal information from our systems.

This email is a receipt to confirm that this request has been completed and we have deleted all of your personal information in compliance with {applicable regulation}

Thanks,
{Name} or Team {Company Name}

Conclusion

The topics these templates cover will often be the first interaction with customers regarding their privacy relationship with your business. Adapting each of these templates to your company's needs will ensure that a positive foundation is in place for ongoing respectful privacy management.

If you're just getting started processing these requests, there are many different approaches and solutions your company can take. One of these is Ethyca. We help some of the world's foremost D2C brands comply with CCPA & GDPR automatically, so your team doesn't have to spend any time processing these subject requests.

Interested in learning more about how you can automate compliance with global privacy laws? Set up a quick call with one of our Privacy Pros today!