

A thick black L-shaped frame surrounds the text. The top horizontal bar is on the left, the left vertical bar is on the left, and the bottom horizontal bar is on the right, with a vertical bar on the right side.

How to avoid the drowsy effect of privacy policies?

A study of intralingual translation

PLAIN 2019 - Oslo

Outline

1

- Background

2

- Analysis

3

- Conclusions

Background

- ▶ [Cambridge Analytica](#) & [Facebook](#) scandal.
- ▶ Privacy policy: legal document that tells readers how a company uses their personal data.
- ▶ Keyword: **personal data**. Used for advertising and for political purposes.
- ▶ **Nobody reads privacy policies**. Studies = users claim they're "too long" and "confusing".
- ▶ Would it help if they were written in plain language? **How can translation help?**

Background

- ▶ GDPR. Principle of transparency: information addressed to the public must be concise, easily accessible and easy to understand, and **written in clear and plain language**.
- ▶ Roman Jakobson classified translation into three possible types:
 - A. interlingual translation (French into English)
 - B. **intralingual translation (expert-laymen)**
 - C. intersemiotic translation (a book into a movie)

Background

Translator's toolkit = plain language style guides. Language, structure, design.

- ❑ *How to write clearly + Claire's clear writing tips (EU)*
- ❑ *Oxford Guide to Plain English (Cutts)*
- ❑ *Writing for Dollars, Writing to Please (Kimble)*
- ❑ *Plain Language Legal Writing (Stephens)*
- ❑ *NARA Style Guide*

Facebook's Data Policy is not written in clear and plain language.

Intralingual translation can help simplify the text.

Analysis

Stage 1: analysis of ST with VisibleThread = starting point

Stage 2: classification of units (translator's toolkit)

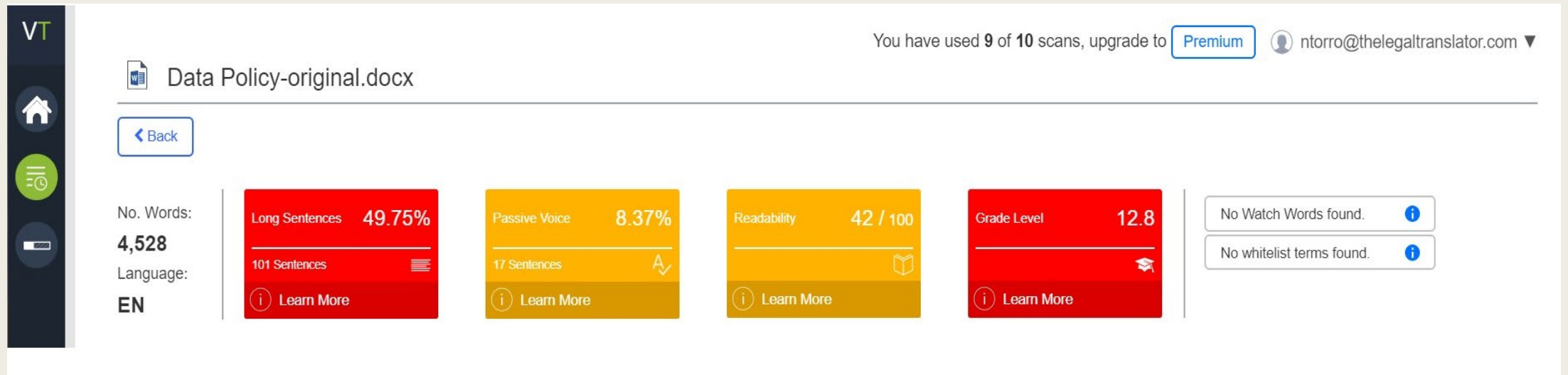
Stage 3: intralingual translation. Average reader.

Stage 4: analysis of IT with VisibleThread = comparison

Stage 5: test with readers

Analysis

Stage 1: analysis of ST with VisibleThread = starting point



No, Facebook's Data Policy is not written in clear and plain language.

Analysis

Stages 2 & 3: classification of units and intralingual translation

<p>{Your usage.} [We collect information about how you use Facebook Products, such as the types of content you view or engage with; the features you use; the actions you take; the people or accounts you interact with; and the time, frequency and duration of your activities.]. For example, we log when you're using and have last used our Products, and what posts, videos and other content you view on our Products. [We also collect information about how you use features like our camera.]</p>	<p>Information about how you use Facebook Products and features.</p> <p>We collect:</p> <ul style="list-style-type: none">• the types of content you view or engage with;• the features you use;• the actions you take;• the people or accounts you interact with; and• the time, frequency and duration of your activities. <p>For example, we log when you're using and have last used Facebook Products, and what posts, videos and other content you view on Facebook Products.</p>
<ol style="list-style-type: none">1. You usage (abstract) → how you use Facebook products and features (concrete)2. Bullets3. features → products and features (avoid unnecessary repetitions)	

Analysis

Stage 4: analysis of IT with VisibleThread

The screenshot displays the VisibleThread analysis interface. On the left is a dark sidebar with the 'VT' logo and icons for home, list, and document. The main content area shows the document title 'Data Policy-reformulada (2).docx' and a 'Back' button. Below this are four analysis cards: 'Long Sentences' (30.42%, 73 sentences), 'Passive Voice' (3.75%, 9 sentences), 'Readability' (46 / 100), and 'Grade Level' (10.4). Each card includes a 'Learn More' link. On the right, two status boxes indicate 'No Watch Words found.' and 'No whitelist terms found.', each with an information icon. At the top right, a notification states 'You have used 9 of 10 scans, upgrade to Premium' with a 'Premium' button, and a user profile for 'ntorro@thelegaltranslator.com'.

VT

You have used 9 of 10 scans, upgrade to [Premium](#) ntorro@thelegaltranslator.com ▼

Data Policy-reformulada (2).docx

[← Back](#)

No. Words:
3,754

Language:
EN

Metric	Value	Count	Grade
Long Sentences	30.42%	73 Sentences	
Passive Voice	3.75%	9 Sentences	A
Readability	46 / 100		
Grade Level	10.4		

[Learn More](#) [Learn More](#) [Learn More](#) [Learn More](#)

No Watch Words found. [i](#)

No whitelist terms found. [i](#)

Analysis

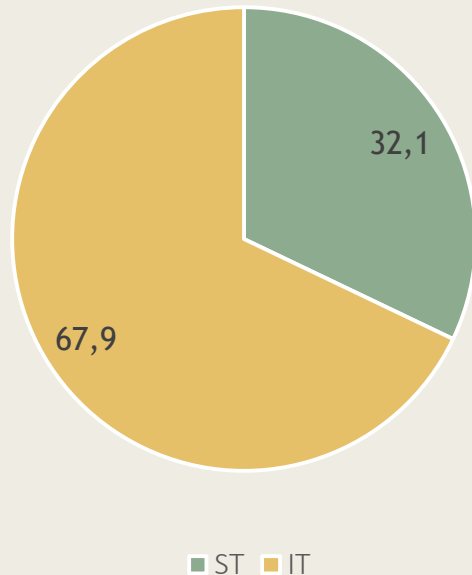
Stages 1 & 4: comparison

	Aim for	ST	IT	Changes
Wordcount	N/A	4,528	3,754	-18%
Average sentence length	20	22	15	-7
Long sentences	5%	49.75%	30.42%	-19.33%
Passive voice	4%	8.37%	3.75%	-4.62%
Readability	+60	42/100	46/100	+4
Grade level	8	12.8	10.4	-2.4

Analysis

Stage 5: test with readers

Extract 1

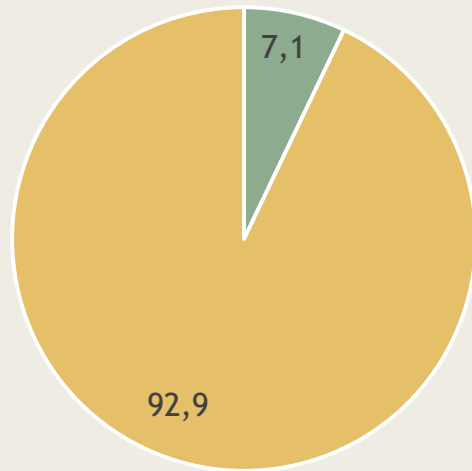


- Because I understand it in one go (10)
- Because the design/layout/structure of the information is accessible (9)
- Because I find the information I expected to find based on the section's title (3)
- It doesn't contain unnecessary details and superfluous words. It gets straight to the point (1)
- Shorter sentences (1)
- Not only is the design-structure of the information accessible, but so is the language used (1)

Analysis

Stage 5: test with readers

Extract 2



■ ST ■ IT

- Because I understand it in one go (6)
- Because the design/layout/structure of the information is accessible (19)
- Not only is the design-structure of the information accessible, but so is the language used (1)

Conclusions

- ▶ The **translator's toolkit works** for privacy policies. We have successfully applied 17/24 intralingual techniques.
- ▶ Complex task (but worth it!). Convey a clear message, never patronize. Diverse readership.
- ▶ Added bonus: clear texts → **easier to translate into other languages.**
- ▶ We need:
 - ❑ more research and literature
 - ❑ professionalize the field (*plain legal translation*)
 - ❑ more translators involved
 - ❑ interdisciplinary teams



Questions?

@thelegaltr
ntorro(at)thelegaltranslator.com



Thank you!