

October 5, 2023

Re: *In re Google Location History Litigation* Proposed Cy Pres Award

Dear Ms. Wolfson and Mr. Sobol,

I write in response to your letter of September 15, 2023, inviting the Center on Law and Information Policy (CLIP) at Fordham University School of Law to submit a proposal to receive a *cy pres* award from the settlement of *In re Google Location History Litigation*, No. 5:18-cv-05062-EJD (N.D. Cal.). On behalf of CLIP, I submit a proposal under this cover.

Our proposal contemplates four discrete projects, summarized here and described in detail in the accompanying proposal packet:

1. ***Privacy Educators Program***: A revision and expansion of an existing CLIP-developed curriculum designed to educate elementary and middle school students about online privacy. *Funding Range: \$228,200.00 - \$911,913.58.*
2. ***Educating Educators About Privacy-by-Design***: A new program aimed at training K-12 educators and administrators about privacy concepts as they design or purchase education and monitoring tools that may access or collect data about students. *Funding Range: \$112,000.00 - \$680,513.58.*
3. ***Making Data Breach Notifications Work: A Large Language Model Approach to Safeguarding Consumer Privacy***: A new project that will leverage advancements in machine learning and natural language processing to translate complex data breach notifications into simple language, and evaluate how effective simplified notifications are in encouraging people to take remedial action in the event of a breach. *Funding Range: \$20,500.00 - \$150,500.00.*
4. ***Global South Privacy Researcher Fellowship***: A new program that will allow CLIP to host internet privacy scholars from regions in the Global South for academic-year-long research fellowships. *Funding Range: \$56,000.00 - \$280,000.00.*

We would welcome and appreciate support for any or all of these proposed projects.

The funding ranges provided reflect our best estimates of the costs associated with achieving the goals, objectives, and activities of each project, as described in detail in the accompanying proposal packet. If the Court and the parties should wish to offer funding beyond the indicated ranges, we would welcome the additional support and would apply it in furtherance of stated project goals and objectives.

Additionally, CLIP, like the other research centers at Fordham University School of Law, relies on outside funding in the form of grants and individual donations to support its general administration and operation. Should the parties and the Court wish to provide additional funding to support CLIP's administration and operation in any amount deemed appropriate, we would welcome that as well.

We would be happy to discuss our proposals in more detail, or to answer any questions that you may have. Please do not hesitate to contact us.

We appreciate your recognizing CLIP's work toward promoting internet privacy, and we thank you for inviting us to submit a proposal.

Sincerely,

Tom Norton
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Organization Information

1. Name of organization.

Fordham University School of Law Center on Law and Information Policy (CLIP).

2. Discuss the founding and history of the organization.

The Center on Law and Information Policy (CLIP) is an academic research center at Fordham University School of Law. CLIP was founded in 2005 to make significant contributions to the development of law and policy for the information economy, as well as to teach the next generation of information law leaders.¹ Toward these ends, CLIP brings together scholars, the bar, the business community, technology experts, the policy community, students, and the public to address and assess policies and solutions for cutting-edge issues that affect the evolution of the information economy.

CLIP supports and conducts research, organizes public events, and facilitates high-level discourse on topics such as data privacy and security, internet governance, intermediary liability, online speech, and others. CLIP's work is disseminated widely, helping to influence the guiding principles of our information-driven society and find solutions to legal issues posed by information technologies.

Over the past ten years, CLIP has focused substantially on internet privacy. CLIP's work on student data privacy has produced groundbreaking research, including studies about public schools' use of cloud computing services, as well as the marketplace for student data among data brokers. CLIP has also received two grants from the National Science Foundation (NSF) to study online privacy notices in interdisciplinary collaboration with computer science colleagues. And last year, CLIP was awarded a third grant from the NSF to investigate methods to design software systems that are accountable to privacy and data protection law and regulation.

CLIP's work has had significant and meaningful impact on law and policy. Its work on student data privacy sparked a Congressional hearing about "How Data Mining Threatens Student Privacy"—a first-of-its-kind meeting between members of the U.S. House of Representatives Committee on Homeland Security Subcommittee on Cybersecurity, Infrastructure Protection, and Security Technologies and the U.S. House of Representatives Committee on Education and the Workforce, Subcommittee on the Early Childhood, Elementary, and Secondary Education.² The research also influenced the passage of Vermont's data broker registration law.³ Additionally, multiple examples of CLIP's work on online

¹ CLIP was founded by the late Joel Reidenberg, the Stanley D. and Nikki Waxberg Chair and Professor of Law, who was a pioneer in the field of information law. Professor Reidenberg's groundbreaking 1998 article, *Lex Informatica: The Formulation of Information Policy Rules Through Technology* (76 TEX. L. REV. 553 (1998)), laid the foundation for conceptualizing information systems as governance schemes and showed that the design of networked systems creates rules that compete with—and sometimes supplant—traditional forms of regulation.

² See *How Data Mining Threatens Student Privacy: Joint Hearing Before the Subcommittee on Cybersecurity, Infrastructure Protection, and Security Technologies of the Committee on Homeland Security House of Representatives and the Subcommittee on Early Childhood, Elementary, and Secondary Education of the Committee on Education and the Workforce*, 113th Cong. (2013).

³ See *Data Brokers*, OFF. OF THE VT. ATT'Y GEN. (Dec. 5, 2017), <https://ago.vermont.gov/blog/2017/12/05/data-brokers/> (listing N. Cameron Russell, Joel R. Reidenberg, Elizabeth Martin & Thomas B. Norton, *Transparency and the Marketplace for Student Data*, VA. J.L. & TECH. 107 (2019) among the materials that were publicly submitted to

privacy notices were cited by the California Office of the Attorney General as Documents and Other Information Relied Upon in drafting regulations to the state’s landmark California Consumer Privacy Act.⁴ Beyond this, CLIP regularly publishes in law and technology forums, and presents at leading conferences and events. CLIP is guided by a Board of Advisors that has counted among its members lawyers practicing information law, industry professionals, and members of the federal judiciary.

3. Describe the organization’s current goals.

CLIP’s current goals include:

- ***Conducting cutting-edge research in information law topics.*** CLIP aims to continue its track record of producing high-quality, influential scholarly work on information law topics including data privacy and security, internet governance, intermediary liability, online speech, and more. Through rigorous analysis and interdisciplinary collaboration, CLIP endeavors to produce research that not only contributes to academic discourse, but also informs policy decisions and shapes the future of information law.
- ***Facilitating public discourse on information law topics.*** CLIP is committed to fostering a vibrant public discourse on critical issues that impact the information society as a whole. CLIP aims to continue to educate the public on issues in information law by organizing and hosting public events, including lectures, conferences, symposia, and roundtable discussions. These events serve as platforms for experts, policymakers, and the public to exchange ideas, share insights, and explore the implications of information law in our increasingly digital world. By promoting open dialogue and knowledge sharing, CLIP aims to empower individuals to make informed decisions and advocate for policies that uphold the values of privacy, security, and free expression in the digital age.
- ***Training law students to form the next generation of information law leaders.*** CLIP is deeply committed to nurturing the next generation of legal professionals who will shape the future of information law. CLIP believes that hands-on experience and mentorship are essential for students aspiring to become leaders in this field. To this end, CLIP aims to provide law students with valuable opportunities for engagement through fellowships, research projects, and collaborative initiatives that equip them with the practical skills and real-world experiences necessary to excel as information law leaders.

the Vermont General Assembly in connection with Vermont’s data broker regulation legislation, Act of May 22, 2018, 2018 Vt. Acts and Resolves 584).

⁴ See CCPA Regulation – Documents and Other Information Relied upon, STATE OF CALIF. OFF. OF THE ATTY. GEN., <https://oag.ca.gov/privacy/ccpa/docs-info> (listing Cranor, et al., Design and Evaluation of a Usable Icon and Tagline to Signal an Opt-Out of the Sale of Personal Information as Required by CCPA (February 4, 2020); Norton, Thomas B., The Non-Contractual Nature of Privacy Policies and a New Critique of the Notice and Choice Privacy Protection Model, 27 Fordham Intell. Prop. Media & Ent. L.J. 181 (2016); and Reidenberg et al., Ambiguity in Privacy Policies and the Impact of Regulation (March 22, 2016) Journal of Legal Studies, Forthcoming; Fordham Law Legal Studies Research Paper No. 2715164, among the materials that the state’s Department of Justice relied upon during its rulemaking process).

4. Provide a brief description of the organization's current programs.

CLIP's current programs include research initiatives, public events, and student engagement opportunities:

Research

CLIP has two ongoing, multi-year interdisciplinary privacy research projects funded by the National Science Foundation:

- *Legal Accountability as Software Quality*: A collaboration with computer science colleagues at Carnegie Mellon University to examine how people trained in law and software engineering can work together in design teams to collect and represent legal and technical information for the purpose of building accountability into software from the outset of the design process.
- *Answering People's Privacy Questions*: A collaboration with computer science colleagues at Carnegie Mellon University and Penn State University to develop query answering tools for privacy, to relieve consumers' burden to read and understand privacy disclosures by offering them technological tools to answer their privacy questions based on automated processing of privacy policy text.

Public Events

- *Law and Information Policy Roundtable Series*: Each month, CLIP hosts a roundtable discussion about an emerging information law topic. The series convenes academics, lawyers, industry experts, technologists, and students to discuss current developments in the information law field in an off-the-record, casual setting.
- *Annual Reidenberg Lecture Series*: CLIP hosts an annual lecture program to honor the life and contributions of the late Professor Joel Reidenberg, CLIP's founder.
- *Conferences and Symposia*: CLIP hosts and co-sponsors conferences and symposia on information law topics. CLIP faculty and staff also appear as speakers, panelists, and moderators for outside programs.
- *Lectures, Presentations, Book Talks, and Workshops*: CLIP hosts experts in the field of information law, including academics, technologists, industry professionals, and others, to present their recent work.

Student Engagement Opportunities

- *Decennial Fellows Program*: A program for a select group of first-year law students with a demonstrated interest in information law for community-building, networking, and extracurricular learning about topics in information law.
- *Student and Tech-Law Faculty Conversation Series*: A bi-weekly conversation series to bring together Fordham law students and technology-focused faculty for informal discussions about emerging developments in information law.

- *Privacy Educators Program*: A first-of-its-kind privacy education program in which Fordham law students visit New York City public schools to teach a CLIP-developed curriculum focused on online privacy and safety to elementary and middle school students.
 - *CLIP-ings Weekly E-Newsletter*: A weekly roundup of information law news produced by student editorial fellows.
 - *Tech Law Career Series*: A career mentoring series for which CLIP invites information law practitioners from diverse sectors (*e.g.*, big law, non-governmental organizations, small and boutique firms, public interest organizations, etc.) to meet informally with students to discuss their work and dispense career advice.
 - *International Association of Privacy Professionals (IAPP) Westin Scholar Award*: Each year, CLIP nominates a student committed to working in privacy to receive the award, which comes with a cash prize, IAPP membership, and free access to trainings and programs.
- 5. Has your organization ever received a prior *cy pres* award? If yes, please cite the applicable case(s), identify the amount(s) awarded, and describe the nature and scope of the project(s) funded.**

Yes. In 2012, CLIP received \$75,000 in *cy pres* funds from settlement of the NebuAd class action lawsuit (*Valentine v. NebuAd, Inc.*, No. 3:08-cv-05113 (TEH) (N.D.Cal.)). The award funded CLIP to develop a first-of-its-kind privacy education program geared toward elementary and middle school students, the Privacy Educators Program. The award supported the development of a set of turnkey curriculum materials and the piloting of the program in a New York City middle school.

In 2015, CLIP received \$120,000 from the Digital Trust Foundation, the non-profit privacy foundation charged with controlling the disposition of *cy pres* settlement funds in the Facebook Beacon Privacy Class Action Lawsuit (*Lane v. Facebook*, Case No. 5:08-cv-03845-RS (N.D.Cal.)). The grant funded a full-time privacy fellow at CLIP and supported the continuation of the Privacy Educators Program.

- 6. Has your organization been reviewed or rated by Charity Navigator or similar entity? If yes, what are the organization's ratings?**

As CLIP is part of Fordham University School of Law, it has not been separately reviewed. However, Fordham University has been reviewed by Charity Navigator and received a 100% Four-Star rating.

Proposal #1: Privacy Educators Program

7. Identify the organization's principal investigator or project director.

Tom Norton is the Executive Director of the Center on Law and Information Policy. His research focuses on privacy and data protection law and policy as well legal accountability in software systems. His work appears in both law and technology publications, and he has received support from the National Science Foundation. At Fordham, Tom teaches courses in Information Privacy Law. Tom earned a JD from Fordham University School of Law and served as CLIP's Privacy Fellow from 2014 to 2016. Prior to returning to CLIP as Executive Director, Tom was a litigation attorney at the law firm Arent Fox LLP in New York City. He is admitted to practice in the State of New York and the Commonwealth of Massachusetts.

Ron Lazebnik is the Academic Director of the Center on Law and Information Policy, the Director of Fordham's J.D. Externship Program, and the Director of the school's Samuelson-Glushko Intellectual Property and Information Law Clinic. His academic and scholarly interests include IP law, information law, and intersection of law and technology. Before joining Fordham, he was in private practice, where he helped represent clients in various matters involving patents, copyrights, trademarks, trade secrets, and general commercial litigation. He has also assisted in the defense of corporations and government agencies being investigated by the SEC, the Public Company Accounting Oversight Board, and the U.S. Department of Justice. Professor Lazebnik is a graduate of Harvard Law School, and holds a Master's degree in electrical engineering from Case Western Reserve University.

8. Provide a summary of the plan for the program or project request. Include the issue and/or opportunity addressed, goals and objectives, activities, and timeline.

CLIP will update and expand its Privacy Educators Program ("PEP"), a first-of-its-kind curriculum designed to teach elementary and middle school students about online privacy and safety.

PEP aims to enhance elementary and middle school students' digital privacy literacy by teaching them about the technology they use, how it works, and how it relates to their own privacy and identity. Through the program, students learn what privacy is, why it is of value to them, and how they can safeguard it while engaging in digital, social culture. The program also teaches students practical tips for steps they can take to protect their privacy online, such as managing their social network accounts, passwords, and mobile privacy settings. The program is designed to educate children about how to use internet-connected technologies in privacy-minded ways.

CLIP first developed the Privacy Educators Program curriculum in 2013. CLIP makes the curriculum available as a set of free, open-source documents to any educators who want to use the instructional materials to address the many privacy issues children and teens face as their use of technology skyrockets.

In its current form, the curriculum features a set of five one-hour-long sessions covering the following topics:

1. *Introduction to Privacy*: This session introduces the concept of privacy and discusses its importance. Students investigate what privacy means to them and how it is relevant in their daily lives. It creates a baseline for subsequent sessions on more specific privacy and technology issues.

2. *Passwords and Behavioral Ads*: This session explains how passwords can be used to protect privacy. It provides students with practical tips for creating secure passwords and assesses the risks involved in sharing passwords. The lesson also addresses behavioral, targeted advertising.
3. *Dealing with Social Media*: This session gives students practical tips for navigating tricky social situations that can arise because of social media use. Discussions in this section focus on privacy tradeoffs, managing privacy settings, maintaining a healthy balance between online and offline relationships, maintaining a healthy relationship with social media, and ways to disengage from social media.
4. *Understanding Mobile, Wi-Fi, and Facial Recognition*: This session focuses on how the technologies we use every day may be compromising our privacy in unexpected ways. Students learn the basics of how certain information technologies work and discuss the costs and benefits of data collection and use.
5. *Managing a Digital Reputation*: This session challenges students to think about how to actively manage a digital reputation. It introduces the concept of audiences and highlights the multiple audiences involved in digital communications. This session emphasizes the permanent, searchable nature of online communications and how this impacts reputation management.

Each spring, CLIP assembles a team of law student volunteers to teach the PEP curriculum at two diverse public schools in Manhattan. As described in more detail below, CLIP proposes to update the program so that it better reflects current and emerging privacy issues that students in the target demographic face, as well to expand the program's adoption in New York City, the New York metropolitan area, and beyond.

Issue Addressed

Young people using connected devices often misunderstand how their virtual actions affect their privacy, safety, and long-term reputation. Young people are uniquely vulnerable to hackers, cyberbullies, fraud, and even their own conduct online. Indeed, recent studies have shown that increased online activity can negatively affect children's health and wellbeing.⁵ In response, PEP teaches elementary and middle school students how to protect their privacy online, navigate the complex world of social media, manage cyberbullying incidents, and safeguard their online reputations. Through a five-week series of lessons, discussions, and exercises, PEP teaches young people both why privacy and good digital citizenship are important and how to weigh the consequences of their virtual actions before they interact online. PEP primarily serves low-income and minority students in public school systems, as these populations are often among the most vulnerable.

⁵ See, e.g., Matt Burgess, *A Huge Scam Targeting Kids with Roblox and Fortnite 'Offers' Has Been Hiding in Plain Sight*, Wired, Aug. 14, 2023, 9:19 a.m., <https://www.wired.com/story/poison-pdf-scam-fortnite-roblox/?redirectURL=https%3A%2F%2Fwww.wired.com%2Fstory%2Fpoison-pdf-scam-fortnite-roblox%2F>.

Goals and Objectives

Goals	Objectives
Update the PEP curriculum materials to better reflect current and future privacy issues children and teens face online, including by aligning the program curriculum with New York State STEM standards.	Engage an education consultant to conduct a review of and undertake large-scale revision of existing curriculum materials.
Develop benchmarking and assessment tools to measure and quantify the program’s effectiveness towards developing students’ privacy knowledge and affecting their privacy practices.	Engage an education consultant with expertise in developing benchmarking and assessment tools.
Create and host interactive digital content based on the program curriculum.	Engage an expert in developing interactive, digital education content. Identify a hosting service to maintain that content.
Expand the program’s adoption by schools in New York City, the New York metropolitan area, and beyond.	Host, produce, and present program demonstrations for school personnel, including teachers, administrators, and members of boards of education. Host a yearly educators’ forum at Fordham University School of Law.
Create a full-time position within CLIP for an individual to administer the program over a multi-year span toward the achievement of these goals and objectives.	Hire a full-time Privacy Fellow to serve as the program’s administrator and figurehead.

Timeline of Activities

Year 1:

- Months 1-3: Hire and train a full-time Privacy Fellow to oversee and administer the program.
- Months 3-9: Hire an education consultant to review and update existing curriculum materials and begin development of benchmarking and assessment tools.
- Months 9-12: Conduct pilot tests of revised curriculum and benchmarking and assessment tools.
- Year 1 Spring: Run the program at CLIP’s existing partner schools in New York City.

Year 2:

- Months 1-3: Revise updated curriculum and benchmarking and assessment tools.
- Months 3-6: Conduct second round of pilot testing on updated curriculum and benchmarking and assessment tools.
- Months 6-9: Hire digital content creator to create interactive digital materials based on the program curriculum.
- Months 9-12: Begin promotional and rollout activity for the newly updated curriculum, including initial presentations to education professionals including teachers, administrators, and boards of education.
- Year 2 Spring: Run the program at CLIP’s existing partner schools in New York City, as well as in new partner schools.

Year 3:

- Continue promotional and rollout activity, including presentations to education professionals including teachers, administrators, and boards of education.
- Update the curriculum and digital content as necessary.
- Host an educators’ forum.

- Run the program at CLIP’s existing partner schools in New York City, as well as in new partner schools.

Year 4:

- Continue promotional and rollout activity, including presentations to education professionals including teachers, administrators, and boards of education.
- Update the curriculum and digital content as necessary.
- Host an educators’ forum.
- Run the program at CLIP’s existing partner schools in New York City, as well as in new partner schools.

Year 5:

- Continue promotional and rollout activity, including presentations to education professionals including teachers, administrators, and boards of education.
- Update the curriculum and digital content as necessary.
- Host an educators’ forum.
- Run the program at CLIP’s existing partner schools in New York City, as well as in new partner schools.

9. Explain why the organization is approaching the issue and/or opportunity in this way.

PEP, through adult-guided peer discussions among elementary and middle school students, teaches young people about the technology they use, how it works, and how it relates to their own privacy and identity. The project encourages young people to explore their sense of privacy, why it might be of value to them, and how they can safeguard it while engaging online. The program provides students with practical skills and tips on things they can do to safeguard their privacy, including managing their social network accounts, passwords, and mobile privacy settings.

We believe this is the best approach for four reasons:

- Young people in the target age group are just beginning to interact on social media and are at a formative stage in their social development. This is a critical window for learning awareness of digital privacy as online engagement increases.
- The program employs an interactive, discussion-based method to stimulate peer interaction rather than lecture. This is a more effective way to reach students in the target age group and convey an appreciation of privacy.
- The program offers practical skills training so that youth will be equipped to deal with changing technologies.
- The goal of creating partnerships in the local community and beyond will lead to the program having lasting impact.

10. Identify and explain the range of funds required to effectuate the program or project request, on an aggregate and annual basis (if applicable), including how the money will be used.

The major components of this project include developing new curriculum materials for the PEP with the assistance of consulting experts, promoting the program toward expanded adoption via workshops, presentations, and forums, and hiring a full-time Privacy Fellow to manage the program.

Funding Range

Scope	Cost
5-Year Full-Scope	\$911,913.58
4-Year Partial-Scope	\$761,162.70
3-Year Partial-Scope	\$613,690.00
2-Year Partial-Scope	\$459,400.00
1-Year Partial-Scope	\$228,200.00

Budget Detail

	Year 1	Year 2	Year 3	Year 4	Year 5	Totals
Privacy Fellow ⁶	\$100,000.00	\$103,000.00	\$106,090.00	\$109,272.70	\$112,550.88	\$530,913.58
Education Consultant	\$50,000.00	\$50,000.00	\$10,000.00	\$5,000.00	\$5,000.00	\$120,000.00
Digital Content Creator	\$50,000.00	\$50,000.00	\$10,000.00	\$5,000.00	\$5,000.00	\$120,000.00
Research Assistants ⁷	\$12,000.00	\$12,000.00	\$12,000.00	\$12,000.00	\$12,000.00	\$60,000.00
Web Hosting Services	\$1,200.00	\$1,200.00	\$1,200.00	\$1,200.00	\$1,200.00	\$6,000.00
Outreach/Expansion Activities	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$25,000.00
Educators Forum at Fordham	\$10,000.00	\$10,000.00	\$10,000.00	\$10,000.00	\$10,000.00	\$50,000.00
<i>Yearly Totals:</i>	<i>\$228,200.00</i>	<i>\$231,200.00</i>	<i>\$154,290.00</i>	<i>\$147,472.70</i>	<i>\$150,750.88</i>	<i>\$911,913.58</i>

11. Will the money be used to continue an existing project or create a new project?

The money will be used to continue the existing Privacy Educators Program. Specifically, the funds will be directed toward achieving the goals, objectives, and activities outlined in response to Question 8, above.

⁶ Reflects yearly salary plus mandatory benefits, accounting for an estimated 3% yearly cost-of-living increase.

⁷ Reflects costs for two Research Assistants per semester, each working 10 hours per week for 10 weeks at a rate of \$20/hr., for each of the fall, spring, and summer semesters.

12. What target population will your organization’s project benefit?

The project will benefit elementary and middle school students in New York City, the New York metropolitan area, and beyond, many of whom come from underrepresented or vulnerable backgrounds. Additionally, the project will benefit law students who participate in the program by giving them the opportunity to develop key lawyering skills, including skills in public speaking and presentation, as well as in tailoring content to a target audience.

Evaluation

13. Will your organization agree to provide a report to the Court and the parties every six months informing the Court and the parties of how any portion of the Settlement Fund allocated to it has been used and how remaining funds will be used?

Yes. CLIP agrees to provide a report to the Court and the parties every six months informing the Court and the parties of how any portion of the Settlement Fund allocated to it has been used and how remaining funds will be used.

14. Describe how your organization will evaluate the success of the grant on enhancing or promoting the protection of internet privacy.

CLIP will evaluate the program’s success based upon several factors:

- **Students better understand privacy and the impact of their online behavior.** Students receiving privacy education through PEP develop and practice more informed, privacy-conscious habits when using online services. Newly created assessment tools meaningfully measure these objectives.
- **CLIP develops and makes available to the public updated curriculum materials.** Updated curriculum materials, including new interactive digital content, better reflect current and future privacy issues children and teens face online. To encourage adoption of the program, these materials align with New York State STEM standards.
- **CLIP develops meaningful tools to track and evaluate student learning.** The newly created tools assess PEP’s effect on student knowledge and conduct as related to the PEP’s topics.
- **New partner institutions teach the PEP curriculum.** Partner institutions represent New York City, the New York metropolitan area, and beyond. CLIP collaborates with these partner institutions to identify schools willing to adopt the PEP curriculum. CLIP creates protocols for tracking institutional participation and student impact and to provide support as needed.

15. Does your organization intend to use the results of the project in any publications, conference papers, and presentations?

CLIP may use select results from the project in publications, conference papers, and presentations.

Proposal #2: Educating Educators About Privacy-by-Design

7. Identify the organization's principal investigator or project director.

Tom Norton is the Executive Director of the Center on Law and Information Policy. His research focuses on privacy and data protection law and policy as well legal accountability in software systems. His work appears in both law and technology publications, and he has received support from the National Science Foundation. At Fordham, Tom teaches courses in Information Privacy Law. Tom earned a JD from Fordham University School of Law and served as CLIP's Privacy Fellow from 2014 to 2016. Prior to returning to CLIP as Executive Director, Tom was a litigation attorney at the law firm Arent Fox LLP in New York City. He is admitted to practice in the State of New York and the Commonwealth of Massachusetts.

Ron Lazebnik is the Academic Director of the Center on Law and Information Policy, the Director of Fordham's J.D. Externship Program, and the Director of the school's Samuelson-Glushko Intellectual Property and Information Law Clinic. His academic and scholarly interests include IP law, information law, and intersection of law and technology. Before joining Fordham, he was in private practice, where he helped represent clients in various matters involving patents, copyrights, trademarks, trade secrets, and general commercial litigation. He has also assisted in the defense of corporations and government agencies being investigated by the SEC, the Public Company Accounting Oversight Board, and the U.S. Department of Justice. Professor Lazebnik is a graduate of Harvard Law School, and holds a Master's degree in electrical engineering from Case Western Reserve University.

8. Provide a summary of the plan for the program or project request. Include the issue and/or opportunity addressed, goals and objectives, activities, and timeline.

CLIP will start a new program aimed at making sure that the educators and administrators responsible for the education of students in grades K-12 are more aware of privacy-by-design concepts as they design or purchase education and monitoring tools that may access or collect data about their students.

Issue Addressed

While there are several laws that protect student data, such as the Family Educational Right and Privacy Act and the Children's Online Privacy Protection Act, the existence of these laws makes educators and their administrators believe that as long as they are complying with the laws, they are fulfilling their students' privacy requirements. The problem with this frame of mind is that it allows for the compilation of large data sets regarding students. Should cybersecurity measures fail to protect this data, or should third party vendors facilitating the collection or use of the data not be as complaint as school systems are led to believe,⁸ the information regarding these children becomes at risk. Educators and their administrators must therefore be educated about the principles of privacy by design to better understand when it is appropriate to collect student information and to limit what is collected to only what is necessary to achieve a legitimate goal for the school system.

⁸ See, for example The Federal Trade Commission's action against education technology provider Chegg Inc. https://www.ftc.gov/system/files/ftc_gov/pdf/2023151-Chegg-Complaint.pdf

Goals and Objectives

Goals	Objectives
Determine the level of attention educators and their administrators have for minimizing the amount of data they gather regarding students and the policies school systems follow in selecting third party data to handle student data.	Engage a Privacy Fellow to assist in the collection, categorization, and statistical coding of online privacy policies and guidelines in U.S. school systems.
Develop curriculum to address limitations in the ways school systems train teachers and administrators regarding the use of student data and develop an interactive online course and certification tool to help train educators and their administrators.	Engage an expert in developing interactive, digital education content. Identify a hosting service to maintain that content.
Deploy the interactive course and reach out to school systems to encourage adoption of the training.	Host, produce, and present program demonstrations for school personnel, including teachers, administrators, and members of boards of education. Host a yearly educators' forum at Fordham University School of Law.

Timeline of Activities

Year 1:

- Months 1-3: Hire and train a full-time Privacy Fellow to oversee and administer the program.
- Months 3-4: Develop research protocol for the collection of information from all U.S. school systems in consultation with Fordham University faculty engaged in empirical research.
- Months 4-5: Hire and train research assistants to help in the collection and statistical coding of the data.
- Months 6-12: Engage in the collection and statistical coding of the data.

Year 2:

- Months 1-12: Continue in the collection and statistical coding of the data, draft and publish report on findings.

Year 3:

- Months 1-3: Develop curriculum and script for training materials.
- Months 4-6: Hire digital content creator to create interactive digital materials based on the program curriculum. Update the curriculum and digital content as necessary.
- Months 7-9: Conduct pilot tests of digital materials.
- Months 9-12: Begin promotional and rollout activity, including initial presentations to education professionals including teachers, administrators, and boards of education.

Year 4:

- Continue promotional and rollout activity, including presentations to education professionals including teachers, administrators, and boards of education.
- Update the curriculum and digital content as necessary.
- Host an educators' forum.

Year 5:

- Continue promotional and rollout activity, including presentations to education professionals including teachers, administrators, and boards of education.
- Update the curriculum and digital content as necessary.
- Host an educators’ forum.

9. Explain why the organization is approaching the issue and/or opportunity in this way.

Most teachers in U.S. school systems face a limited budget and a significant number of demands on their attention to provide meaningful education to students that complies with state and federal guidelines. By developing an open-source interactive online video tutorial and certification system, educators will have easy access to the concepts of privacy by design. This will make review of these important concepts relatively easy given the limited amount of time teachers are able to focus on these issues instead of their primary focus of education.

10. Identify and explain the range of funds required to effectuate the program or project request, on an aggregate and annual basis (if applicable), including how the money will be used.

Funding Range

Scope	Cost with Funding for Proposal #1	Cost Without Funding for Proposal #1
5-Year Full-Scope	\$119,600.00	\$680,513.58
4-Year Partial-Scope	\$108,400.00	\$546,762.70
3-Year Partial-Scope	\$92,200.00	\$411,290.00
2-Year Partial-Scope	\$36,000.00	\$239,000.00
1-Year Partial-Scope	\$12,000.00	\$112,000.00

Budget Detail

With Funding for Proposal #1

	Year 1	Year 2	Year 3	Year 4	Year 5	Totals
Digital Content Creator	-	-	\$50,000.00	\$10,000.00	\$5,000.00	\$65,000.00
Research Assistants ⁹	\$12,000.00	\$24,000.00	-	-	-	\$36,000.00
Web Hosting Services	-	-	\$1,200.00	\$1,200.00	\$1,200.00	\$3,600.00
Outreach/Expansion Activities	-	-	\$5,000.00	\$5,000.00	\$5,000.00	\$15,000.00
<i>Yearly Totals:</i>	<i>\$12,000.00</i>	<i>\$24,000.00</i>	<i>\$56,200.00</i>	<i>\$16,200.00</i>	<i>\$11,200.00</i>	<i>\$119,600.00</i>

⁹ Reflects four Research Assistants per semester, working 10 hours per week for 10 weeks at a rate of \$20/hr., for half the first year and all the fall, spring, and summer semesters the second year.

Without Funding for Proposal #1

	Year 1	Year 2	Year 3	Year 4	Year 5	Totals
Privacy Fellow ¹⁰	\$100,000.00	\$103,000.00	\$106,090.00	\$109,272.70	\$112,550.88	\$530,913.58
Digital Content Creator			\$50,000.00	\$10,000.00	\$5,000.00	\$65,000.00
Research Assistants ¹¹	\$12,000.00	\$24,000.00				\$36,000.00
Web Hosting Services			\$1,200.00	\$1,200.00	\$1,200.00	\$3,600.00
Outreach/Expansion Activities			\$5,000.00	\$5,000.00	\$5,000.00	\$15,000.00
Educators Forum at Fordham			\$10,000.00	\$10,000.00	\$10,000.00	\$30,000.00
<i>Yearly Totals:</i>	<i>\$112,000.00</i>	<i>\$127,000.00</i>	<i>\$172,290.00</i>	<i>\$135,472.70</i>	<i>\$133,750.88</i>	<i>\$680,513.58</i>

11. Will the money be used to continue an existing project or create a new project?

The money will be used to start a new project. Specifically, the funds will be directed toward achieving the activities outlined in response to Question 8, above.

12. What target population will your organization’s project benefit?

The ultimate target population for the project is children in grades K through 12 but the immediate beneficiaries will be educators for grades K through 12 who have more access to training in the use of student data online.

Evaluation

13. Will your organization agree to provide a report to the Court and the parties every six months informing the Court and the parties of how any portion of the Settlement Fund allocated to it has been used and how remaining funds will be used?

Yes. CLIP agrees to provide a report to the Court and the parties every six months informing the Court and the parties of how any portion of the Settlement Fund allocated to it has been used and how remaining funds will be used.

14. Describe how your organization will evaluate the success of the grant on enhancing or promoting the protection of internet privacy.

The initial success of the program will be measured by CLIP’s ability to publish an empirical report on the policies and guidelines used throughout the U.S. to guide educators and their administrators in their

¹⁰ Reflects salary plus mandatory benefits, accounted for an estimated 3% yearly cost-of-living increase.

¹¹ Reflects four Research Assistants per semester, working 10 hours per week for 10 weeks at a rate of \$20/hr., for half the first year and all the fall, spring, and summer semesters the second year.

design of projects that use student data, as well as the ability to present the findings at educator forums. Following completion of the first phase of the project, indicators of success will be based on the number of certifications issued by the programs and the number school systems that issue guidance to educators in line with the principals of privacy-by-design.

15. Does your organization intend to use the results of the project in any publications, conference papers, and presentations?

CLIP may use select results from the project in publications, conference papers, and presentations.

Proposal #3: Making Data Breach Notifications Work: A Large Language Model Approach to Safeguarding Consumer Privacy

7. Identify the organization’s principal investigator or project director.

Aniket Kesari is an Associate Professor at Fordham Law School. His research focuses on law and technology, data science, and public policy. He uses techniques drawn from causal inference, machine learning, and natural language processing to investigate questions in law & tech, and he is also interested in integrating data science into empirical legal studies more broadly. Some of his recent scholarship looks at data breach notification laws, mandatory cybersecurity risk disclosures, privacy and algorithmic fairness, trademark search engines, and online hate speech. His work has appeared in law reviews (*George Washington Law Review, Berkeley Technology Law Journal, Illinois Journal of Law, Technology, and Policy, NYU Journal of Legislation and Public Policy*), peer-reviewed social science outlets (*Journal of Empirical Legal Studies, Journal of Online Trust and Safety*), and peer-reviewed computer science proceedings (*Neural Information Processing Systems AI for Social Good Workshop, ACM Symposium on Computer Science and Law*). Prior to joining Fordham, Aniket was a researcher at NYU’s Information Law Institute, UC Berkeley’s Social Science Data Lab, and ETH Zurich’s Center for Law and Economics. At Berkeley, he conducted research and developed training materials for an NSF grant funding hate speech research, and a NIH grant funding doctoral computational social science training. He holds a PhD from UC Berkeley, a JD from Yale, and BA from Rutgers – New Brunswick.

Tom Norton is the Executive Director of the Center on Law and Information Policy. His research focuses on privacy and data protection law and policy as well legal accountability in software systems. His work appears in both law and technology publications, and he has received support from the National Science Foundation. At Fordham, Tom teaches courses in Information Privacy Law. Tom earned a JD from Fordham University School of Law and served as CLIP’s Privacy Fellow from 2014 to 2016. Prior to returning to CLIP as Executive Director, Tom was a litigation attorney at the law firm Arent Fox LLP in New York City. He is admitted to practice in the State of New York and the Commonwealth of Massachusetts.

Ron Lazebnik is the Academic Director of the Center on Law and Information Policy, the Director of Fordham’s J.D. Externship Program, and the Director of the school’s Samuelson-Glushko Intellectual Property and Information Law Clinic. His academic and scholarly interests include IP law, information law, and intersection of law and technology. Before joining Fordham, he was in private practice, where he helped represent clients in various matters involving patents, copyrights, trademarks, trade secrets, and general commercial litigation. He has also assisted in the defense of corporations and government agencies being investigated by the SEC, the Public Company Accounting Oversight Board, and the U.S. Department of Justice. Professor Lazebnik is a graduate of Harvard Law School, and holds a Master’s degree in electrical engineering from Case Western Reserve University.

8. Provide a summary of the plan for the program or project request. Include the issue and/or opportunity addressed, goals and objectives, activities, and timeline.

Can law inform consumers about and safeguard them against identity theft? Every U.S. state now has a “data breach notification law” that requires breached firms to disclose these incidents to consumers. In theory, these laws should empower consumers to take control of their identity theft mitigation efforts and encourage organizations to adopt stronger cybersecurity standards.

However, these breach notices are often ineffective, in part because they are not legible to average consumers. Then-Attorney General Kamala Harris noted that breach notifications are often written at a college reading level, well above the 7th-8th grade average for American consumers.¹² These notices oftentimes contain legalese and are not clear about what steps consumers should take to opt into services such as identity theft protection. Some states have adopted requirements that breach notices be written in more accessible formats with clear headings, but most states have not.

This project aims to fill this gap by leveraging recent advances in machine learning and natural language processing (NLP) to translate data breach notifications for the public. Leveraging new NLP models such as GPT-4, CLIP will develop a pipeline for summarizing data breach notifications, simplifying them to the 7th-grade reading level, and assessing their efficacy at getting consumers to opt in to certain interventions such as subscribing to identity theft protection services, freezing their credit following a breach, and availing themselves of privacy-enhancing technologies such as two-factor authentication. CLIP will use survey experiments to assess whether consumers find our summaries more readable and actionable, and field experiments to assess whether simplified breach notifications spur consumer safeguarding of personal data.

This project builds on work previously done by PI Kesari on both data breach notification laws and legal summarizers. Previously, Kesari has empirically examined whether data breach notification laws reduce identity theft reports, and which statutory mechanisms might be most effective at reducing identity theft.¹³ He is also currently working on a series of projects that use GPT-4 to summarize United States Supreme Court opinions and make them accessible at a 7th-grade reading level. Initially results from a survey in the field suggest that the methodology works well for improving reading comprehension of complex legal opinions.

9. Explain why the organization is approaching the issue and/or opportunity in this way.

Much of the empirical work on data breach notifications has focused on retrospective assessments of whether these laws work and under what conditions. The methodology proposed here provides an interesting opportunity to turn to *prospective* work that can inform future changes to breach notification laws and directly help consumers. Data breach notification laws are the most popular and ubiquitous U.S. privacy laws and are updated routinely in all 50 states. The outputs from this project can therefore influence the development of the legal discourse around privacy and security in an impactful way and explore how to make sure these laws achieve their purpose.

Conducting field experiments on different delivery mechanisms for simplified breach notifications is also promising because of its potential to directly benefit research subjects. Regardless of the outcome of the

¹² Kamala D. Harris, Data Breach Report 2012, California Department of Justice, https://oag.ca.gov/system/files/attachments/press_releases/BREACH%20REPORT%202012.pdf.

¹³ Kesari, A. (2022). Do data breach notification laws reduce medical identity theft? Evidence from consumer complaints data. *Journal of Empirical Legal Studies*, 19(4), 1222–1252. <https://doi.org/10.1111/jels.12331>; Kesari, Aniket, Do Data Breach Notification Laws Work? (August 30, 2022). Forthcoming, *NYU Journal of Legislation and Public Policy*. Available at SSRN: <https://ssrn.com/abstract=4164674> or <http://dx.doi.org/10.2139/ssrn.4164674>.

research, this methodology will ensure that consumers who have been the victim of data breaches will receive some direct benefits.

10. Identify and explain the range of funds required to effectuate the program or project request, on an aggregate and annual basis (if applicable), including how the money will be used.

The major components of this project will include compute resources for generating simplified summaries, funds to run high-quality surveys to assess the usefulness of the summaries, and funds for a field experiment to measure consumer propensity to opt into privacy enhancing interventions. Beyond these funds, CLIP also anticipates that funding would be used host events to train law students in data breach notification drafting and response, and as well as to host an annual conference for training industry professionals on identity theft, data security, and privacy.

Funding Range

Scope	Cost
5-Year Full-Scope	\$150,500.00
4-Year Partial-Scope	\$123,000.00
3-Year Partial-Scope	\$90,500.00
2-Year Partial-Scope	\$58,000.00
1-Year Partial-Scope	\$20,500.00

Budget Detail

	Year 1	Year 2	Year 3	Year 4	Year 5	Totals
Language Model Resources	\$1,000.00	\$1,000.00	\$1,000.00	\$1,000.00	\$1,000.00	\$5,000.00
Compute Resources	\$500.00	\$500.00	\$500.00	\$500.00	\$500.00	\$2,500.00
Surveys and Field Experiments	\$5,000.00	\$10,000.00	\$5,000.00	\$5,000.00	\$0.00	\$25,000.00
Research Assistants ¹⁴	\$12,000.00	\$12,000.00	\$12,000.00	\$12,000.00	\$12,000.00	\$60,000.00
Travel for Conferences, Presentations, etc.	\$2,000.00	\$4,000.00	\$4,000.00	\$4,000.00	\$4,000.00	\$18,000.00
Conference Hosting	\$0.00	\$10,000.00	\$10,000.00	\$10,000.00	\$10,000.00	\$40,000.00
<i>Yearly Totals:</i>	<i>\$20,500.00</i>	<i>\$37,500.00</i>	<i>\$32,500.00</i>	<i>\$32,500.00</i>	<i>\$27,500.00</i>	<i>\$150,500.00</i>

¹⁴ Reflects two Research Assistants per semester, working 10 hours per week for 10 weeks at a rate of \$20/hr., for each of the fall, spring, and summer semesters.

11. Will the money be used to continue an existing project or create a new project?

The money will be used to begin a new project, as described in response to Question 8 above.

12. What target population will your organization's project benefit?

The project will benefit consumers who have been the victims of data breaches and identity theft more broadly. Nearly every American consumer has had data compromised in a breach. Nearly 3 million Americans suffer from identity theft annually. The average identity theft incident case costs \$1,300 to resolve, making an incident massively costly to the average American consumer. The elderly, low-income, and Black Americans are victimized at particularly high rates. If the project is successful, it can inform future legal interventions to bolster data breach notification laws. Even without legal change, this research will help empower these populations to reduce their risk of identity theft.

Evaluation

13. Will your organization agree to provide a report to the Court and the parties every six months informing the Court and the parties of how any portion of the Settlement Fund allocated to it has been used and how remaining funds will be used?

Yes. CLIP agrees to provide a report to the Court and the parties every six months informing the Court and the parties of how any portion of the Settlement Fund allocated to it has been used and how remaining funds will be used.

14. Describe how your organization will evaluate the success of the grant on enhancing or promoting the protection of internet privacy.

CLIP will evaluate our real-world impact in several ways. First, CLIP will measure whether our interventions encourage better consumer uptake of privacy enhancing measures and technologies, and consequently reduce identity theft. Second, CLIP will track state and federal legislative changes to data breach laws and measure whether our interventions aimed toward improving their readability become the legal standard across various jurisdictions. Third, CLIP will monitor existing publicly posted data breach notices to see if our work encourages firms to write them more clearly and at an accessible reading level.

Beyond these outcomes, CLIP will also evaluate the training programs and measure whether the students and practitioners we train are better prepared to help their organizations prevent data breaches in the first place and manage the consequences of data breaches when they do occur. CLIP will emphasize the importance of understanding how breaches occur, plugging security holes once they are discovered, and communicating with consumers and other stakeholders clearly effectively so that they might safeguard their privacy.

15. Does your organization intend to use the results of the project in any publications, conference papers, and presentations?

CLIP may use select results from the project in publications, conference papers, and presentations.

Proposal #4: Global South Privacy Researcher Fellowship

7. Identify the organization's principal investigator or project director.

Tom Norton is the Executive Director of the Center on Law and Information Policy. His research focuses on privacy and data protection law and policy as well legal accountability in software systems. His work appears in both law and technology publications, and he has received support from the National Science Foundation. At Fordham, Tom teaches courses in Information Privacy Law. Tom earned a JD from Fordham University School of Law and served as CLIP's Privacy Fellow from 2014 to 2016. Prior to returning to CLIP as Executive Director, Tom was a litigation attorney at the law firm Arent Fox LLP in New York City. He is admitted to practice in the State of New York and the Commonwealth of Massachusetts.

Ron Lazebnik is the Academic Director of the Center on Law and Information Policy, the Director of Fordham's J.D. Externship Program, and the Director of the school's Samuelson-Glushko Intellectual Property and Information Law Clinic. His academic and scholarly interests include IP law, information law, and intersection of law and technology. Before joining Fordham, he was in private practice, where he helped represent clients in various matters involving patents, copyrights, trademarks, trade secrets, and general commercial litigation. He has also assisted in the defense of corporations and government agencies being investigated by the SEC, the Public Company Accounting Oversight Board, and the U.S. Department of Justice. Professor Lazebnik is a graduate of Harvard Law School, and holds a Master's degree in electrical engineering from Case Western Reserve University.

8. Provide a summary of the plan for the program or project request. Include the issue and/or opportunity addressed, goals and objectives, activities, and timeline.

The Global South Privacy Researcher Fellowship is a proposed collaborative initiative aimed at fostering international cooperation between CLIP and scholars from the Global South to address privacy issues affecting the Global South. As digital technologies continue to advance, privacy concerns have become increasingly complex and varied. This fellowship program seeks to facilitate knowledge exchange, capacity-building, and collaborative research by providing law researchers from the Global South with the opportunity to address pressing privacy concerns emerging facing Global South regions. Under the proposed program, each academic year (approximately August through May), CLIP will host a visiting researcher from a region in the Global South who will conduct substantive privacy research as well as participate in the public dissemination of their work.

Goals and Objectives

- **Facilitate scholarly and public discourse on privacy issues affecting the Global South.** The program will encourage the development of knowledge, expertise, and dialogue among academia and the public about privacy issues faced in the Global South.
- **Contribute to Policy and Practice.** Work produced by program participants will generate valuable insights and recommendations that can inform policy development and best practices in the field of privacy protection in the Global South and around the world.
- **Foster Collaboration.** The program will encourage and facilitate collaboration and knowledge exchange among law researchers from Global South regions and other areas of the globe.

Timeline of Activities

Year 1: Program Launch and Application Solicitation

- Establish a program committee comprising CLIP personnel and key stakeholders.
- Define program objectives, selection criteria, and eligibility requirements for visiting researchers.
- Promote the program and solicit applications for participation.
- Select an incoming visiting researcher for the following year's first implementation of the program.

Years 2, 3, and Beyond: Program Implementation

- Welcome visiting researcher to CLIP and Fordham.
- Researcher conducts substantive research on privacy issues.
- Researcher participates in seminars, workshops, and knowledge-sharing sessions.
- Researcher presents their findings in public lectures or seminars and publish research papers and reports based on their work.
- CLIP solicits and reviews applications for, and recruits, future visiting researchers.
- Foster further collaboration among program alumni and new researchers.

9. Explain why the organization is approaching the issue and/or opportunity in this way.

CLIP proposes the Global South Privacy Researcher Fellowship for several reasons:

- **Complexity of Privacy Challenges:** Privacy issues are complex and multifaceted, often influenced by local culture, legal frameworks, and technological contexts. International collaboration allows for a more comprehensive understanding of these complexities by convening diverse perspectives from different regions.
- **Global Nature of Privacy Concerns:** Privacy concerns transcend national borders. Data flows, digital platforms, and technology companies operate internationally. Collaborating with researchers and experts on a global scale ensures a holistic approach to understanding privacy challenges.
- **Shared Learning and Best Practices:** Different regions of the world apply unique approaches and best practices in addressing privacy concerns. International collaboration provides an opportunity to share knowledge and learn from successful strategies implemented in diverse global contexts.
- **Increased Impact and Policy Influence:** By uniting researchers, institutions, and stakeholders from different parts of the world, the program can amplify the impact of its efforts. Research findings and policy recommendations generated through the program are more likely to be influential and relevant on a global scale. Because policymaking and regulatory decisions in the digital age have significant international ramifications, the program's collaborative efforts can influence global policies and standards, contributing to a more consistent and robust privacy framework.

10. Identify and explain the range of funds required to effectuate the program or project request, on an aggregate and annual basis (if applicable), including how the money will be used.

Funding Range

CLIP aims to award each visitor receiving the fellowship a \$56,000 stipend. This figure accounts for an estimated \$3,000 per month for rent and \$1,500 per month for food and transportation for the approximately ten months (August through May) of each fellowship term, as well as \$10,000 for travel to and from the U.S. Support for this program over multiple years would require funding as follows:

Total No. Years	Total Cost
1	\$56,000.00
2	\$112,000.00
3	\$168,000.00
4	\$224,000.00
5	\$280,000.00

11. Will the money be used to continue an existing project or create a new project?

The money will be used to begin a new project, as described in response to Question 8 above.

12. What target population will your organization’s project benefit?

The primary beneficiaries of this project include:

- **Visiting Researchers:** Scholars who participate in the program will gain access to resources, mentorship, and opportunities to conduct in-depth research on emerging privacy issues in their regions. The program will empower them to develop expertise, publish research, and contribute to policy discussions, ultimately enhancing their professional growth and impact.
- **Local Communities and Populations in the Global South:** As researchers investigate and address privacy issues specific to their regions, the knowledge generated through this project will benefit local communities and populations in the Global South. By promoting privacy protection and raising awareness of digital rights, the project contributes to safeguarding the interests and privacy of individuals and organizations in these regions.
- **Law and Policy Makers:** The research findings and recommendations produced by the program will be shared with policymakers, government agencies, and regulatory bodies in the Global South. These stakeholders will benefit from evidence-based insights to inform the development of privacy policies, legislation, and guidelines that better serve their constituents and uphold privacy rights.
- **The International Privacy Research Community:** The project’s collaborative approach fosters knowledge exchange and collaboration among researchers, institutions, and experts from around the world. The international privacy research community will benefit from the enriched discourse and cross-cultural perspectives on privacy issues.

- **Civil Society and Advocacy Groups:** Non-governmental organizations and civil society groups dedicated to privacy and human rights in the Global South will benefit from the program’s research. They can use this information to advocate for stronger privacy protections, raise awareness, and hold relevant stakeholders accountable.
- **The Technology and Business Sectors:** Businesses and technology companies operating in the Global South and across the globe will benefit from a better understanding of regional privacy expectations and regulations. This knowledge can guide them in developing privacy-compliant products and services, fostering trust among their users.

Evaluation

13. Will your organization agree to provide a report to the Court and the parties every six months informing the Court and the parties of how any portion of the Settlement Fund allocated to it has been used and how remaining funds will be used?

Yes. CLIP agrees to provide a report to the Court and the parties every six months informing the Court and the parties of how any portion of the Settlement Fund allocated to it has been used and how remaining funds will be used.

14. Describe how your organization will evaluate the success of the grant on enhancing or promoting the protection of internet privacy.

We will evaluate the success of the program in several ways. First, we will closely monitor the program’s impact on scholarly and public discourse including research output, publications, and public engagements such as seminars and lectures. Second, we will assess the program’s contribution to policy and practice by evaluating the extent to which the research conducted by visiting researchers informs policy decisions, both locally and globally. We will also analyze how their insights contribute to the development of best practices in the realm of privacy protection. Third, we will track the growth of professional networks and collaborations among visiting researchers, both within their home countries and across various Global South regions. Furthermore, we will seek feedback and testimonials to gain insights into how effectively the program promotes collaboration and cross-cultural understanding.

15. Does your organization intend to use the results of the project in any publications, conference papers, and presentations?

CLIP may use select results from the project in publications, conference papers, and presentations.