

AMI: Request access to your personal information

Make your request at Open Media's campaign page: <https://openmedia.ca/MyInfo>

How it works:

You

Enter your information
(found on your bills)

Generate a
request letter

Send in
your letter

Telco

How to Access your Info with the AMI Tool

No personally-identifiable information leaves your computer until you send your letter. The application is not designed to collect the information when creating your request.

Andrew Hilts

3 possible outcomes to your request

You receive a formal
reply within 30 days

Program Director, Digital Stewardship Initiative

You receive a response within
30 days (eventually)

Research Fellow, Citizen Lab,
Munk School of Global Affairs, University of Toronto

You do not receive a
response within 30 days

Send Reminder

Or complain to the Privacy
Commissioner of Canada

Your Data

Report request outcome back to Open Media

<https://openmedia.ca/MyInfo/reminder>

Digital
Stewardship
Initiative

MUNK
SCHOOL
OF
GLOBAL
AFFAIRS
UNIVERSITY OF
TORONTO

For more information about AMI, please visit <https://digitalstewards.ca>



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Overview

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Introduction

About DSI & The Citizen Lab

Background

Motivation

Access My Info

Findings

Impact

Limitations

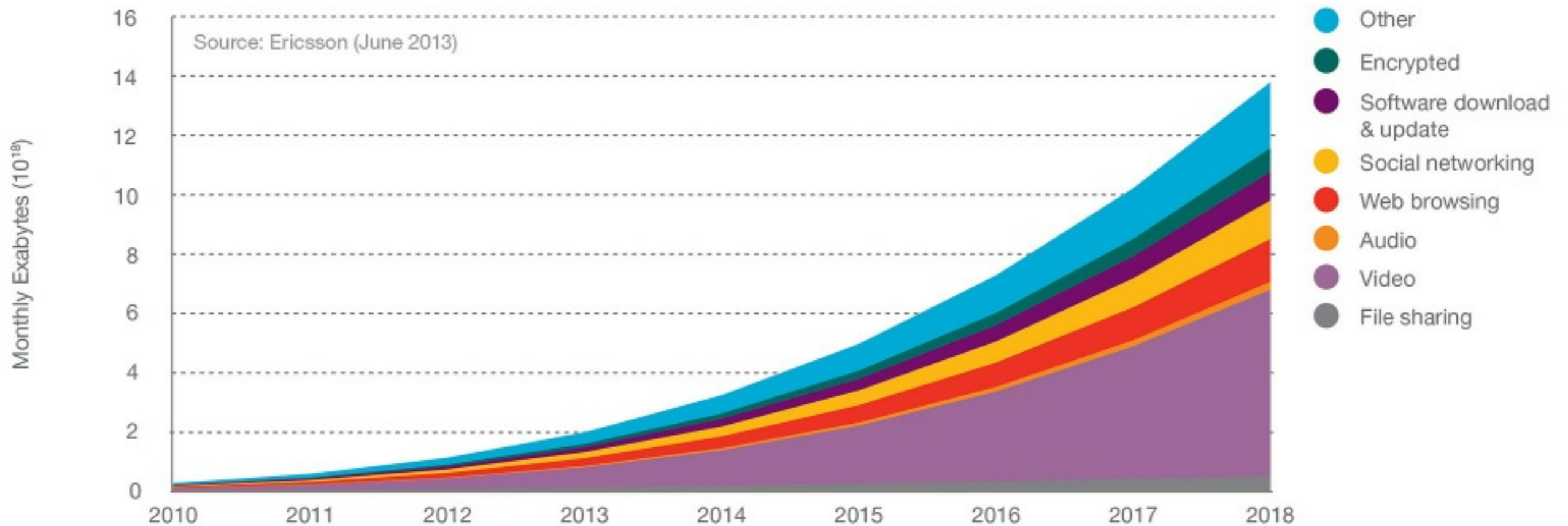
Future Work



Nomadic Lass (2012). *Planning*. <https://flic.kr/p/bfzJAB>

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The importance of Access



Ericsson (2013). *Mobile Data Traffic By Application Type*. <https://flic.kr/p/eBtd3G>

Service providers generate, store, use, and disclose facets of our growing digital footprints

Access to information: A foundational right in a data society

DSI's Mission

Digital
Stewardship
Initiative

Personal data accountability through applied research & development:

- Proof-of-concept tools

- Data standards and best practices

- Comparative analysis of industry practices

Working with citizens, advocates, government, and industry

Operates out of the Citizen Lab

The Citizen Lab

Research at the intersection of the Internet, global security, and human rights

Rigorous technical testing complemented by analysis of political context

Global network of researchers, advocates, activists



Citizen Lab / Aurich Lawson

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TORONTO

Background

Dr. Christopher Parsons' Canadian telecom transparency project:

Investigates how telecommunications data is monitored for state security and intelligence purposes.



Christopher Parsons

Prior work in EU



Institute of Network Cultures (2012). *Max Schrems*.
<https://flic.kr/p/bpvz0j>



Motivation for AMI



Janelle (2011). *Day 82: Information*. <https://flic.kr/p/9t4ay2>

Individuals have legal tools to access their information, but no support

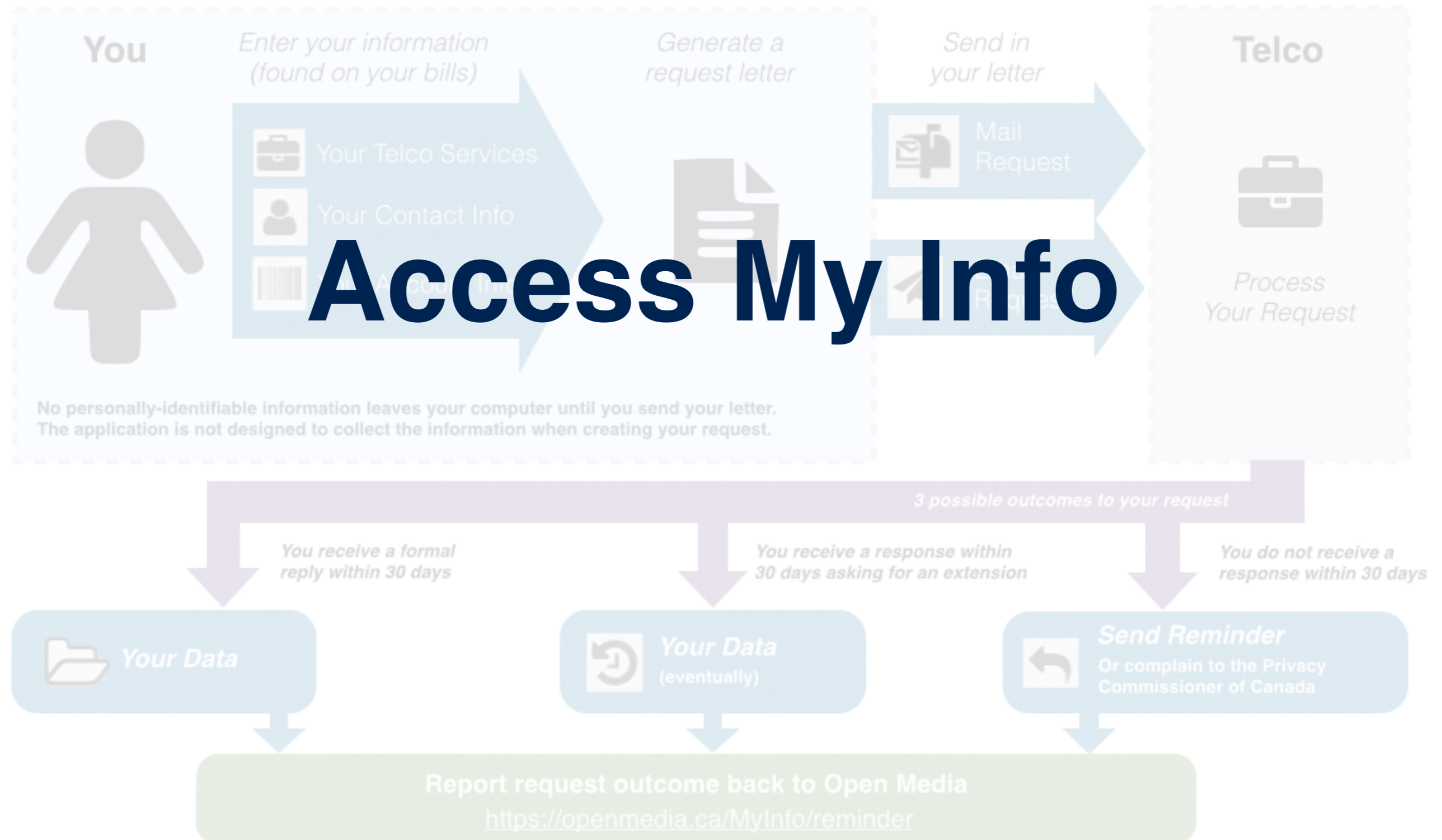
Need for greater control, transparency, and accountability

Send a strong signal to industry

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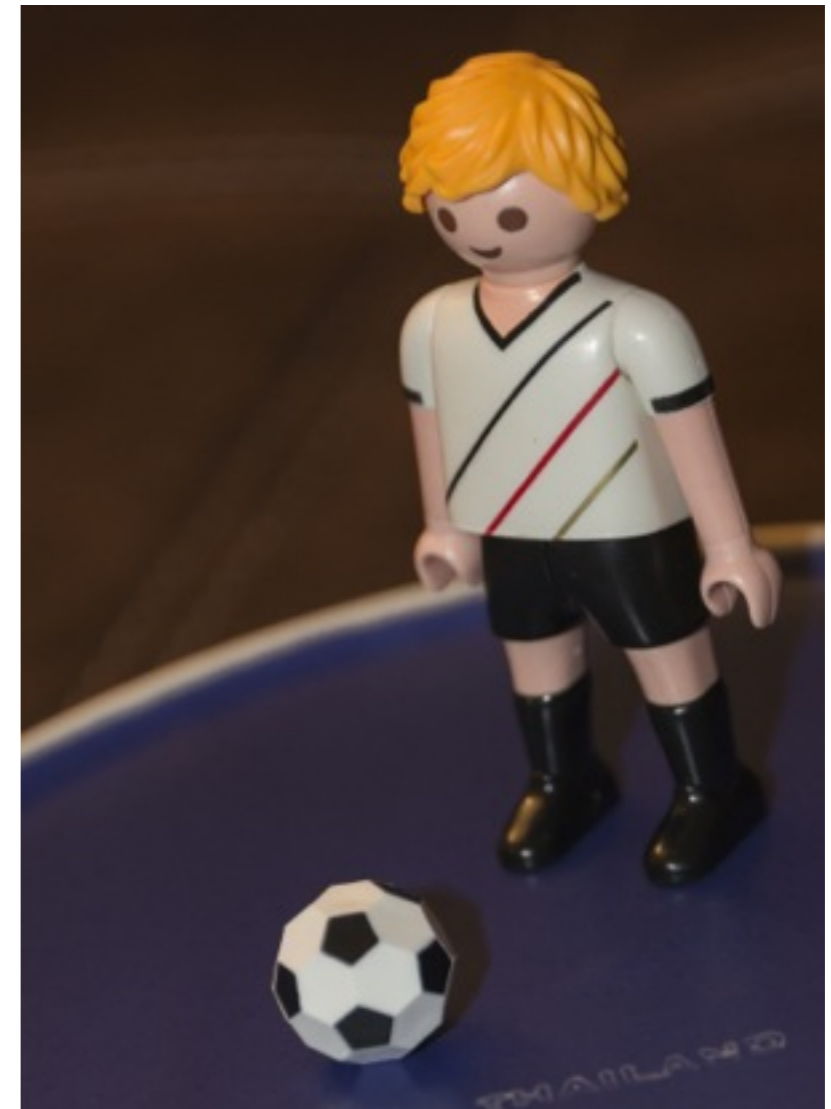


Goals for AMI

Raise awareness of access rights

Empower creation of access requests

Start with tailored requests for telco industry; extend to others in future



trombone65 (2014). *noch ein Tor*. <https://flic.kr/p/ofHQwE>

Design Rationale

Entire process runs locally in a web browser; no inputted data sent to server(s).

Request file as autonomous individual

Open Source software (Apache 2.0)

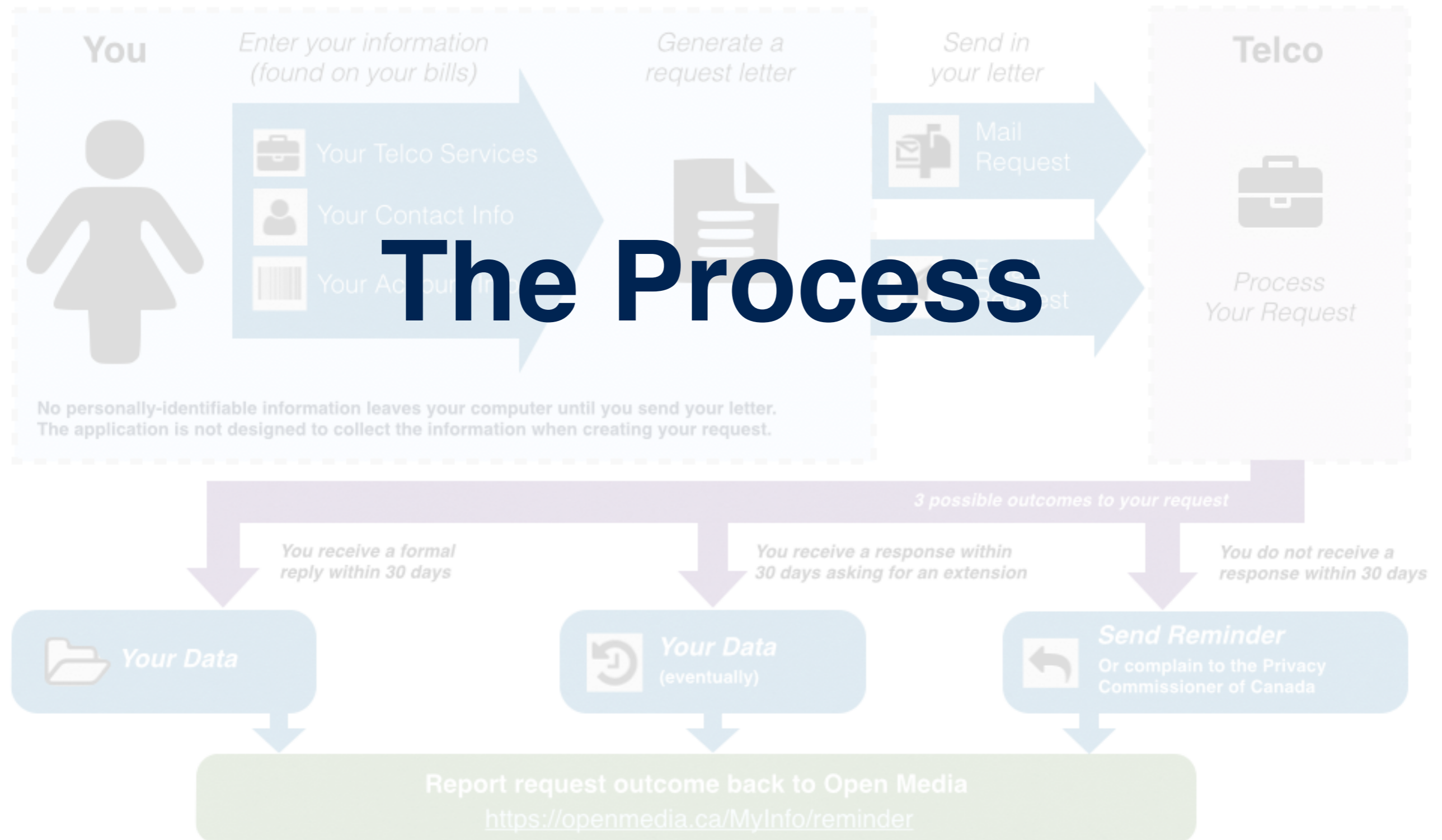


Logo for Apache software. Trademarked by Apache Software Foundation

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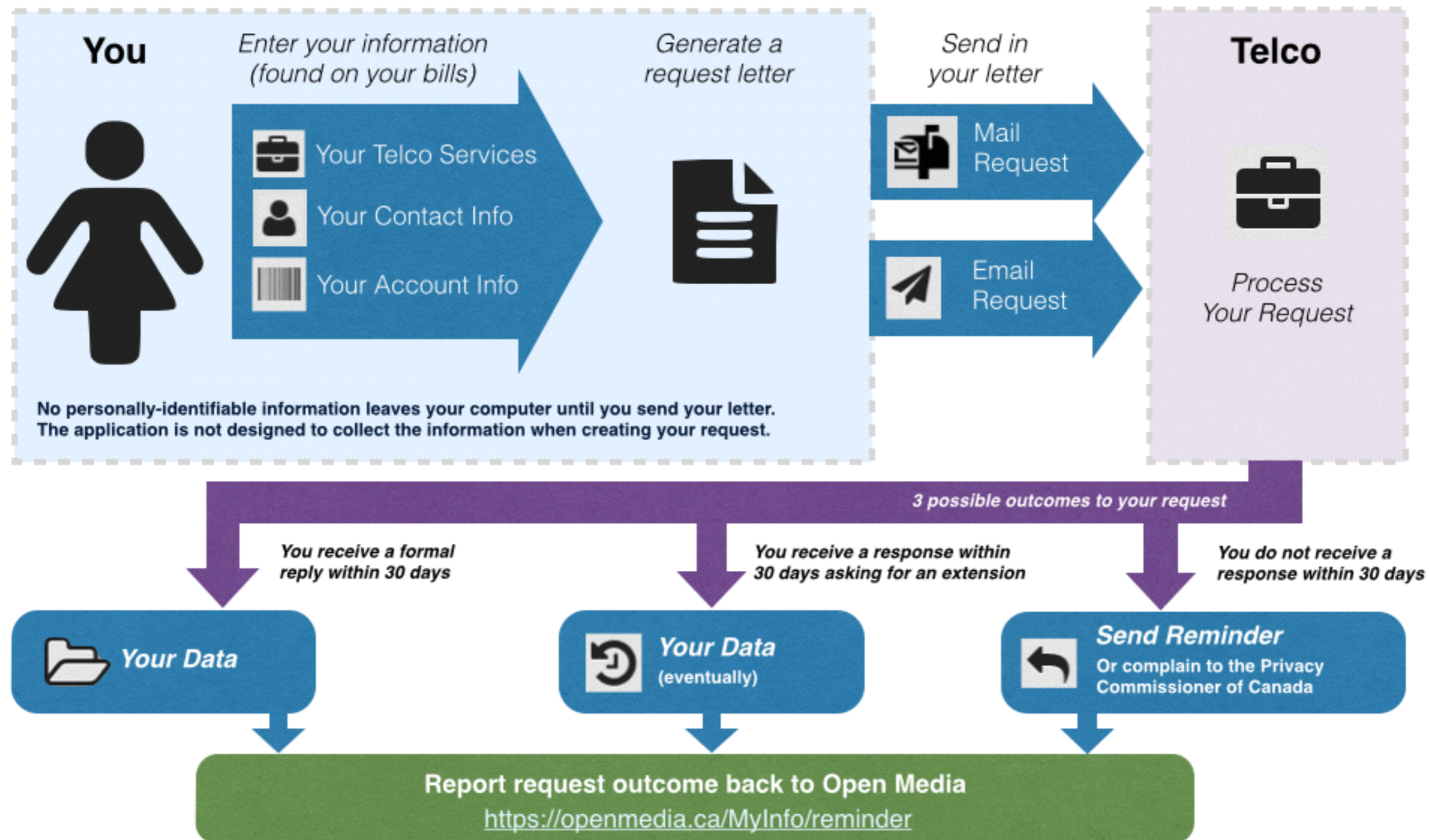
How it works:



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How it works:



Your Telecommunications Service Providers



Begin creating your request by selecting a company that provides you telecommunications services (internet, landline, or mobile telephone). You're entitled to do this for all companies that provide you such services.

Company *

Bell

We've included as many of the major telecom companies as possible, and we're working to add more of the smaller providers too. You can suggest a provider you'd like to see added by emailing contact@openmedia.ca. In the meantime, please consult Christopher Parson's [blog post](#) that includes a template letter you can customize to suit your needs.

Service(s) *

Bell Mobility

Bell Internet

Bell Home Phone



ISP Privacy Transparency Score [↗](#)

Next →

Access My Info

Choose your service provider



Overview

Company

Contact

Account

Letter

Connect



Contact information



Your name and address will be used to create a formal letter and also help Bell identify you in its records. Remember, this form **does not collect your data** – it creates a letter for you to send yourself.

First Name *

Jane

Last Name *

Nymity

Address 1 *

123 Doe Street

Address 2

City *

Someplace

Province *

Saskatchewan

Postal Code *

S7N 0W0

Next →

Access My Info

Input your contact information

Account Details for your Bell services



Your account number and other details help Bell identify the information it holds on you. These details can be found on your monthly invoice or in your service's online account portal.

Do you have one customer account for your Bell Mobility and Bell Internet services?

Bell Mobility and Bell Internet

Account Number *

23402340230

Email Address Associated with Account

jane@nymity.ca

Phone Number Associated with Account

555-123-1234

Next →

Access My Info

Add your account details

Your Request to Bell


Please read over the generated letter carefully!


Option 1: Print your letter by first generating a PDF with the below button. Put it in an envelope and mail to:

Bell Privacy Ombudsman
160 Elgin St.
Ottawa, ON
K2P 2C4
Or email to: privacy@bell.ca

Option 2: Email your letter using the email button. If that doesn't work, or if using **webmail**, please copy and paste the letter below and send to:

Bell Privacy Ombudsman
privacy@bell.ca

 Generate Letter (PDF)

 Email Request

Jane Nymity
123 Doe Street
Someplace, SK
S7N 0W0

September 8th, 2014

160 Elgin St.
Ottawa, ON
K2P 2C4

To: Bell Privacy Ombudsman,

Re: Jane Nymity

Access My Info

Done! Save a PDF or send an email

What's in a request?

I am a subscriber to your telecommunications service, and am interested in understanding the kinds of personal information that you maintain and retain about me. So this is a request to access my personal data under Principle 4.9 of Schedule 1 and section 8 of Canada's federal privacy legislation, the Personal Information Protection and Electronic Documents Act (PIPEDA).

I am requesting a copy of all records which contain my personal information from your organization. The following is a non-exclusive listing of all information that **[name of company]** may hold about me, including the following:

- All logs of IP addresses associated with me, my devices, and/or my account (e.g. IP addresses assigned to my devices/router, IP addresses or domain names of sites I visit and the times, dates, and port numbers)
- Listing of 'subscriber information' that you store about me, my devices, and/or my account
- Any geolocational information that you may have collected about me, my devices, and/or associated with my account (e.g. GPS information, cell tower information)
- Text messages or multi-media messages (sent and received, including date, time, and recipient information)
- Call logs (e.g. numbers dialed, times and dates of calls, call durations, routing information, and any geolocational or cellular tower information associated with the calls)
- Information collected about me, or persons/devices associated with my account, using one of your company's mobile device applications
- Any additional kinds of information that you have collected, retained, or derived from the telecommunications services or devices that I, or someone associated with my account, have transmitted or received using your company's services
- Any information about disclosures of my personal information, or information about my account or devices, to other parties, including law enforcement and other state agencies

If your organization has other information in addition to these items, I formally request access to that as well. Please ensure that you include all information that is directly associated with my name, phone number, e-mail, or account number, as well as any other account identifiers that your company may associate with my personal information.

You are obligated to provide copies at a free or minimal cost within thirty (30) days in receipt of this message. If you choose to deny this request, you must provide a valid reason for doing so under Canada's PIPEDA. Ignoring a written request is the same as refusing access. See the guide from the Office of the Privacy Commissioner at: http://www.priv.gc.ca/information/guide_e.asp#014. The Commissioner is an independent oversight body that handles privacy complaints from the public.

Please let me know if your organization requires additional information from me before proceeding with my request.

Here is information that may help you identify my records:

Full Name: **[Name]**

Account Number: **[Number]**

Email Associated With Account: **[Email address]**

Phone Number Associated with Account: **[Phone number]**

Introduction & Legal Justification

Requesting All Records with Personal Information

These specific records in particular

Any additional information

Obligation to respond

Information to help identification

Your Request to Bell

Show Instructions ▾

Re-save Letter

Email Request

Thanks for creating your letter!

Continue on to maximize your impact ↗

Jane Nymity
123 Doe Street
Someplace, SK
S7N 0W0

September 8th, 2014

160 Elgin St.
Ottawa, ON
K1P 6K1

Access My Info

Invitation to external website



Engage, Educate, Empower

Search

follow us:     

[home](#) [about us](#) [blogs](#) [press room](#) [campaigns](#) [contact us](#) [donate](#)

Yes! Please keep me in the loop

Yes! Keep me in the loop on this and other privacy campaigns:



Yes! Please keep me in the loop:

First name *

Last name *

Email *

OpenMedia.ca will protect your privacy, and keep you informed about this campaign and others. Find OpenMedia.ca's privacy policy here.

Access My Info

Opt-in phase; external website

Sample Response: Fido



Sample Response: Fido

- ... is attached
- Any information about disclosures of my personal information, or information about my account or devices, to other parties, including law enforcement and other state agencies

Rogers is fully in compliance with subsections 9(2.1), (2.2), (2.3) and (2.4) of the Personal Information Protection and Electronic Documents Act (PIPEDA) which provide as follows:

Information related to paragraphs 7(3)(c), (c.1) or (d)

(2.1) An organization shall comply with subsection (2.2) if an individual requests that the organization

(a) inform the individual about

(i) any disclosure of information to a government institution or a part of a government institution under paragraph 7(3)(c), subparagraph 7(3)(c.1)(i) or (ii) or paragraph 7(3)(c.2) or (d), or

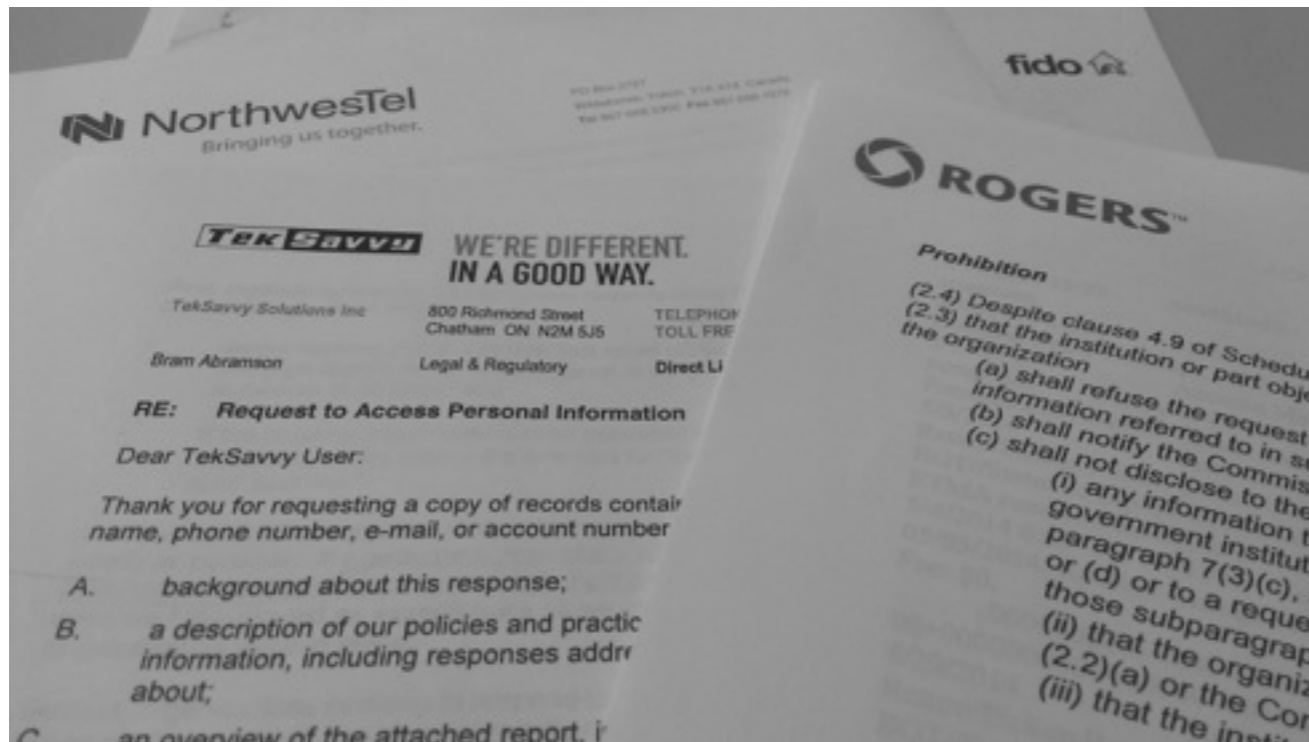
(ii) the existence of any information that the organization has relating to a disclosure referred to in subparagraph (i), to a subpoena, warrant or order referred to in paragraph 7(3)(c) or to a request made by a government institution or a part of a government institution under subparagraph 7(3)(c.1)(i) or (ii); or

(b) give the individual access to the information referred to in subparagraph (a)(ii).

Information Requested

**Response:
Paste in 3 pages of
direct excerpts
from PIPEDA**

Findings



Telcos dealt with requests in different ways

Little information provided about data retention, third party disclosures

Small survey demonstrated mixed degrees of consumer satisfaction

Impact

50,000+ visitors to the app

Tens of thousands of requests filed across 30 telcos; greater awareness of right to information

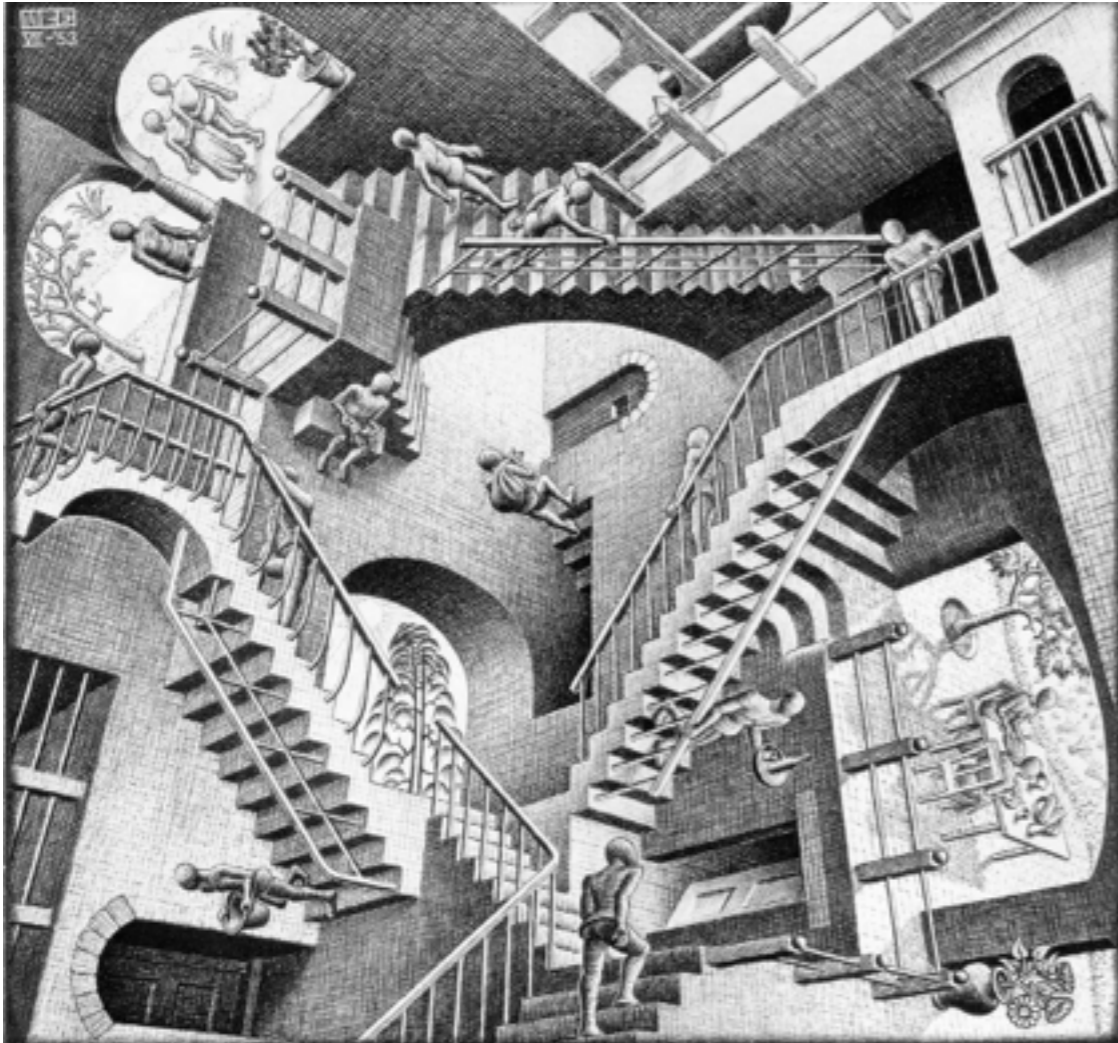
Media coverage helped raise awareness

Telcos adapting practices to better process access requests; opportunity for differentiation

Interest from Privacy Commissioner's Office;



Limitations



M. C. Escher (1953). *Relativity*.

Filing a request is easy; dealing with (non) responses not facilitated

Feedback loop not closed

“Zero-knowledge” approach limits hard data collection

Striking a balance between capacity-building and automation

Implementation challenges

Future Work

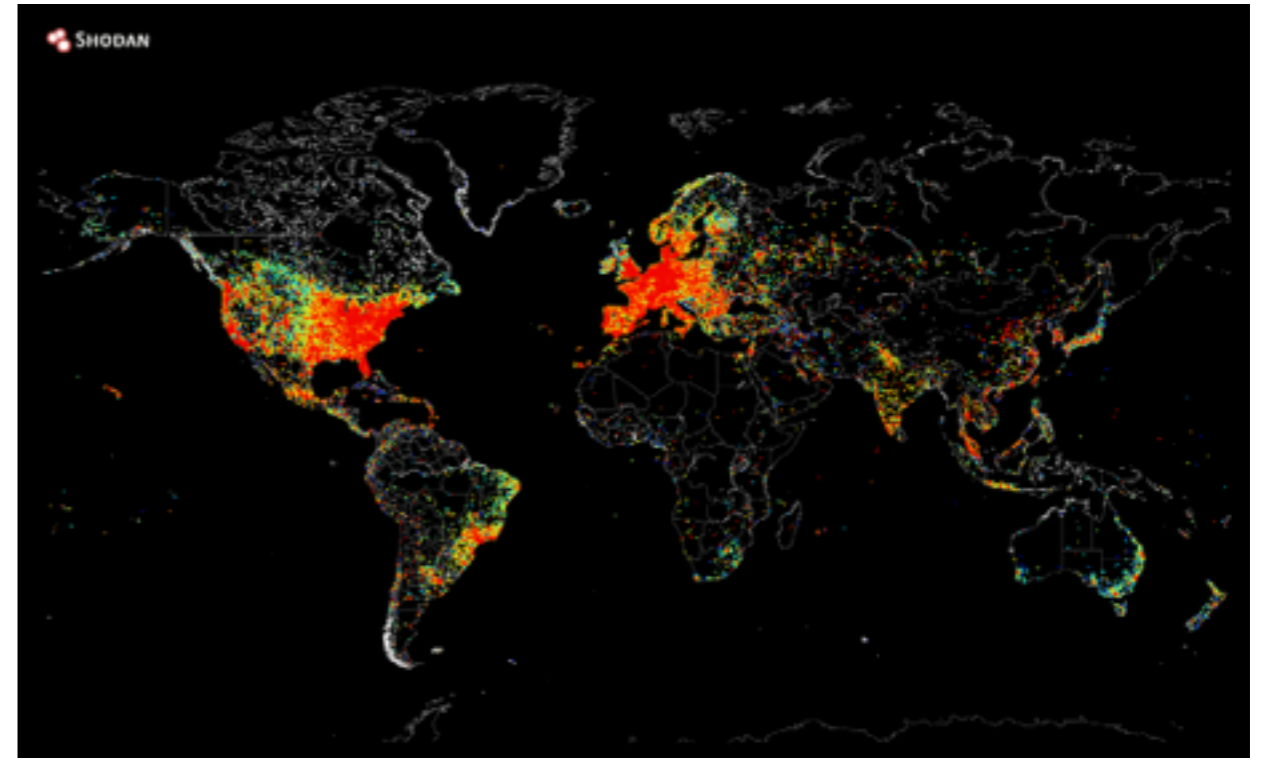
Pending funding:

Extend to new industry categories and jurisdictions

Human-centred redesign

Structured data format for access requests

Work with industry on consumer feedback mechanism



Matherly, John (2014). *I Pinged All Devices on the Internet, here's a Map of them.* <https://imgur.com/aQUHzgu>

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Thank you

How it works:



Questions?

File a request: <https://digitalstewards.ca/ami>

Get in touch:

andrew@digitalstewards.ca

 @andrewchilts

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<https://openmedia.ca/MyInfo/reminder>



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