

**Silicon Valley Wireless:
Privacy and Free Speech Implications
Nicole Ozer, American Civil Liberties Union of Northern California**

| Wireless Silicon Valley Proposals | ACLU Privacy Gold Standard | Silicon Valley Metro Connect | MetroFi |
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| Does the Service Track Improperly Track Users from Session to Session? | Providers should take all reasonable steps to design the system to prevent tracking from session to session. Anonymous and pseudonymous access should be available. | YES. Requires a user login, tied to the user's address and credit card, which allows for what the proposal describes as "user tracking." | YES. Requires a user login that can be used to track individual usage from session to session. |
| Does the Service Commercialize User Data? | Providers should not commercialize personal information without voluntary, opt-in consent. | YES. VERY LIKELY. Neither the proposal nor the EULA contains any limitations on how Metro Connect will share user data with third parties or how user data will be tied to advertisements. | UNCLEAR, but LIKELY. The proposal states that "no personally identifiable information will be shared with 3 rd parties." However, the proposal includes a targeted advertising business model that fails to explain how personal data will be used to target the advertisements. |
| Are Policies in Place to Defend User's Personal Information from Legal Demands that May Lack Proper Judicial Oversight? | Providers should require warrant or take steps to ensure propriety of subpoena, and provide user notice of legal demand as soon as possible. | NO. Will disclose personal information in response to criminal and civil subpoenas. No policy giving users notice of subpoenas. | NO. Will disclose personal information in response to what MetroFi vaguely calls "legal process." Does not state whether it will resist civil subpoenas. No policy giving users notice of subpoenas. |
| Does the Service Have a Data Retention Policy that Minimizes Storage of Personalized User Data? | A data retention schedule should specify that data is kept only for so long as needed to operate the network. | NO. Maintains logs capable of user tracking. No limitations on how long data is retained. | NO. Maintains logs capable of user tracking. No limitations on how long data is retained. |

Green = Privacy friendly /

Yellow = More information needed

Red = Privacy invasive