



WHY TRUSTe?

Since 1997, TRUSTe—the leading trustmark and recognized authority on Internet privacy—has been helping the most successful online brands confidently manage Web site privacy complexity and satisfy regulatory compliance.

We've helped millions of consumers identify trustworthy online organizations and have certified thousands of web sites such as Disney, Yahoo, NFL and Pepsi, including 22 of the Top 50 most-visited Web sites.

Independent research shows that the presence of a TRUSTe web seal makes visitors and customers more likely to share personal information, register at higher rates and spend more money. In fact, over one million consumers click to verify TRUSTe seals every month. Lastly, we provide world class dispute-resolution services for our clients that serve as a customer "pressure valve" by resolving thousands of consumer complaints annually.

BEHAVIORAL ADVERTISING

As Internet advertising and data collection practices change, the behavioral advertising environment increases in the level of complexity which can be confusing for both consumers and businesses. Online advertising now includes a wide range of vendors, intermediaries, networks and affiliates who may interact with user data. Businesses should understand their practices in order to plan privacy compliance and ensure consumer trust. Consumers expect company sites to be responsible for the data they submit, even in cases where intermediaries have business relationships that complicate legal and technical responsibility.

Consumer advocacy groups, the Federal Trade Commission and Congress are all concerned about the issues raised by the broad collection and sharing of personally identifiable information (PII), as well as non-PII that's gathered through online behavioral advertising (BA) and TRUSTe can help.

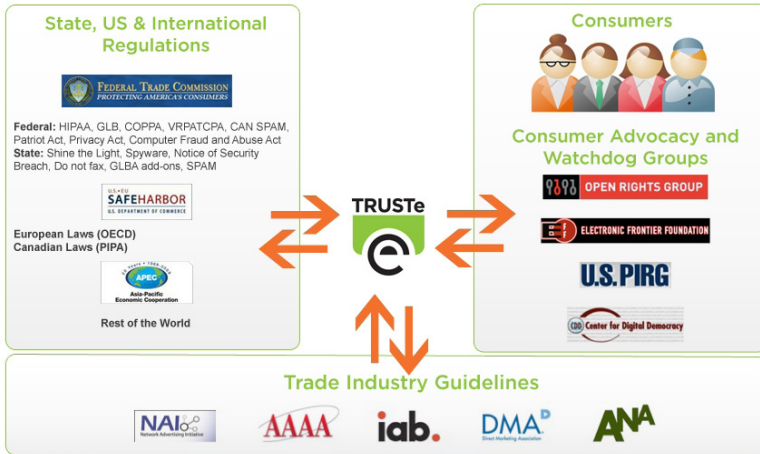
RESULTS FROM TRUSTE'S STUDY OF CONSUMER ATTITUDES ABOUT BEHAVIORAL ADVERTISING

Our 2009 survey revealed the following:

- 43% of respondents said they were familiar with the term "behavioral targeting" (BT)
- 69% knew that their browsing information may be collected by a third-party for advertising purposes.
- 35% felt that their privacy has been invaded or violated in the last year due to the information they provided on the Internet
- 64% of respondents would choose to only see online ads from online stores and brands that they know and trust.

The good news: as a whole, consumer discomfort with tracking of their online advertising has declined by 6 percentage points year over year. Plus, 84% of consumers say that most of the ads they see while browsing online are irrelevant to their wants and needs—and they clearly see a value in BA.

But as a whole, consumers consider privacy important enough to take steps to protect it. Many know and are uncomfortable that their online activities are tracked, even with the assurance of anonymity. Most want tools and features that control targeted advertising. Business have a stark choice: either be transparent about their BA practices or risk increasing consumer doubt and suspicion. Companies need to treat personal information respectfully and earn the right to deliver advertising based on behavior.



TRUSTe is the partner of choice for companies to help navigate the regulations and industry guidelines while building a program that helps companies successfully use BA technologies that consumers can trust.

GUIDELINES FOR BEHAVIORAL ADVERTISING

Companies who use BA should review both their own practices and those of their vendors and partners. This will enable companies to make informed decisions in reaction to any changes in guidance from the legislators or the FTC. The guidelines below cover key areas to address as part of a successful BA program.

1. **Data Use: Transparency and Control** - Be transparent about how your ad networks use customer data. Make users understand clearly what information you're collecting and how you're managing its use.
2. **User Choice and Data Sharing** - Let users choose to opt out of having their data shared with 3rd parties. Make sure your privacy policies are consistent with the sharing of customer data with your vendors and partners, and that they uphold these policies.
3. **Personal Information** - Follow industry best practices when you store and share PII. For example: are you avoiding linking account IDs to identified users—or at least encrypting data that is linked?
4. **Data Retention/Security** - Ensure that your data retention/security plan clarifies how long you store certain types of data.
5. **Cookies** - Make sure your cookie policy defines data types, expiration dates, encryption, user management, and the unique needs of Flash cookies.
6. **Additional Risk Issues** - Develop guidelines and training for all vendors, partners and company personnel that touch customer data.

CONTACT US

TRUSTe
55 2nd Street, 2nd Floor
San Francisco, CA 94105

T 415.520.3400

F 415.520.3420

www.truste.com