



THINKING ABOUT YOUR DATA

November 15, 2011

Joanne Furtsch
Policy & Product Architect



- Founded in 1997 – San Francisco, CA
- Over 4,000 clients
- 20 billion monthly DAA icon impressions
- Billions of consumer impressions/year
- Online privacy solutions for B2C and B2B companies; all major customer channels



Websites



Mobile

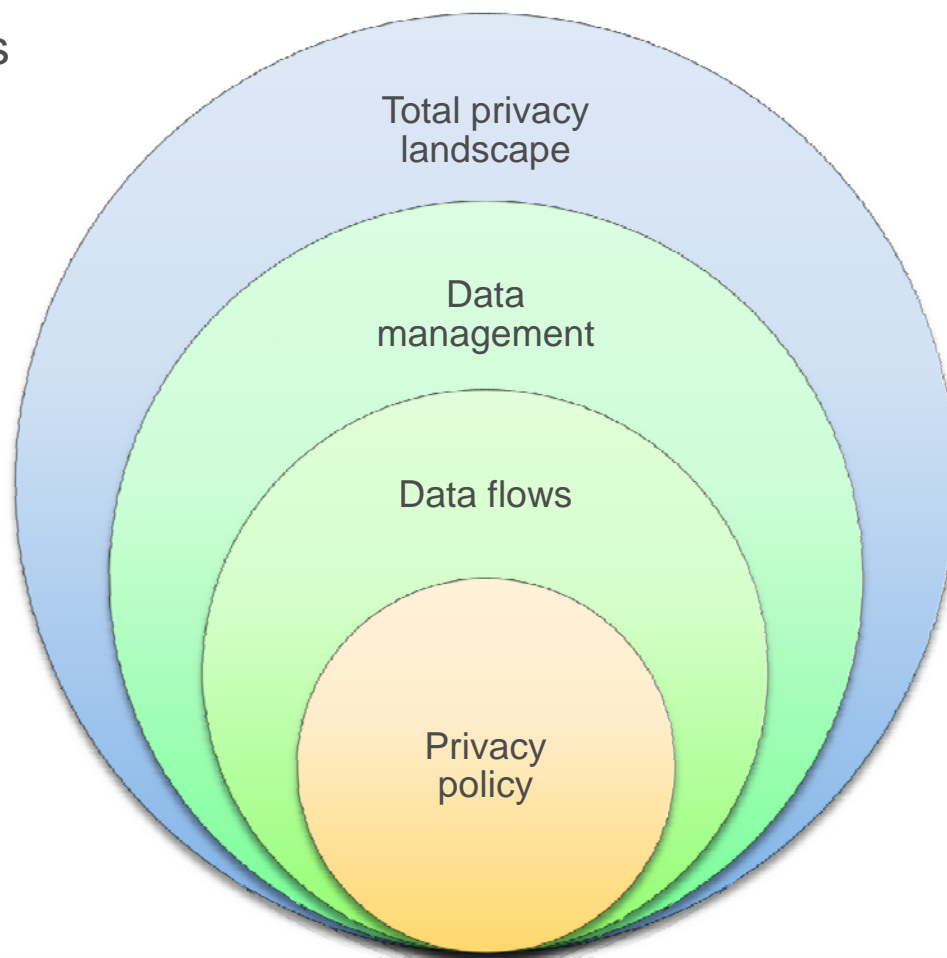


Advertising



Cloud

- Privacy has moved beyond the privacy policy to data management
 - More complex data
 - Multi-national implications
 - Emerging technologies
 - Mobile
 - Cloud
 - Behavioral ads
 - Social media



All businesses collect data



Businesses face data privacy awareness challenges



- Collection awareness
 - Who is collecting data?
 - How data is collected?
 - How is it stored?

- Use awareness
 - What sort of data is used?
 - Use cases? In what combinations?
 - How is data shared?

- Code awareness
 - What does the code really do?
 - nth party code interactions
 - Sync'ing disclosures & compliance with actual code function

Lack of awareness leads to unhappy surprises

8/2009 - Clearspring & Quantcast circumventing cookie deletion



\$2.4M class action settlement

7/2010 - WSJ exposing prevalence of tracking



Spawnded scramble by top-50 Web sites

3/2011 - CMU study found NAI & DAA members not fully compliant with their own requirements



Cast doubt on effectiveness of standards

7/2011 - Stanford study found Epic Marketplace history stealing on Flixster



Epic lost pubs and dollars defending itself

7/2011 - KISSmetrics evading browser choices on Hulu & Spotify



KISSmetrics lost major clients including Hulu

8/2011 - Microsoft called for using 'zombie' cookies w/o disclosures



Shook advertiser confidence; MSFT re-tooled sites

Question to ask when thinking about your data

- What data do you collect?
- How do you use that data?
- What are your data management practices?
- How do you communicate your data practices?

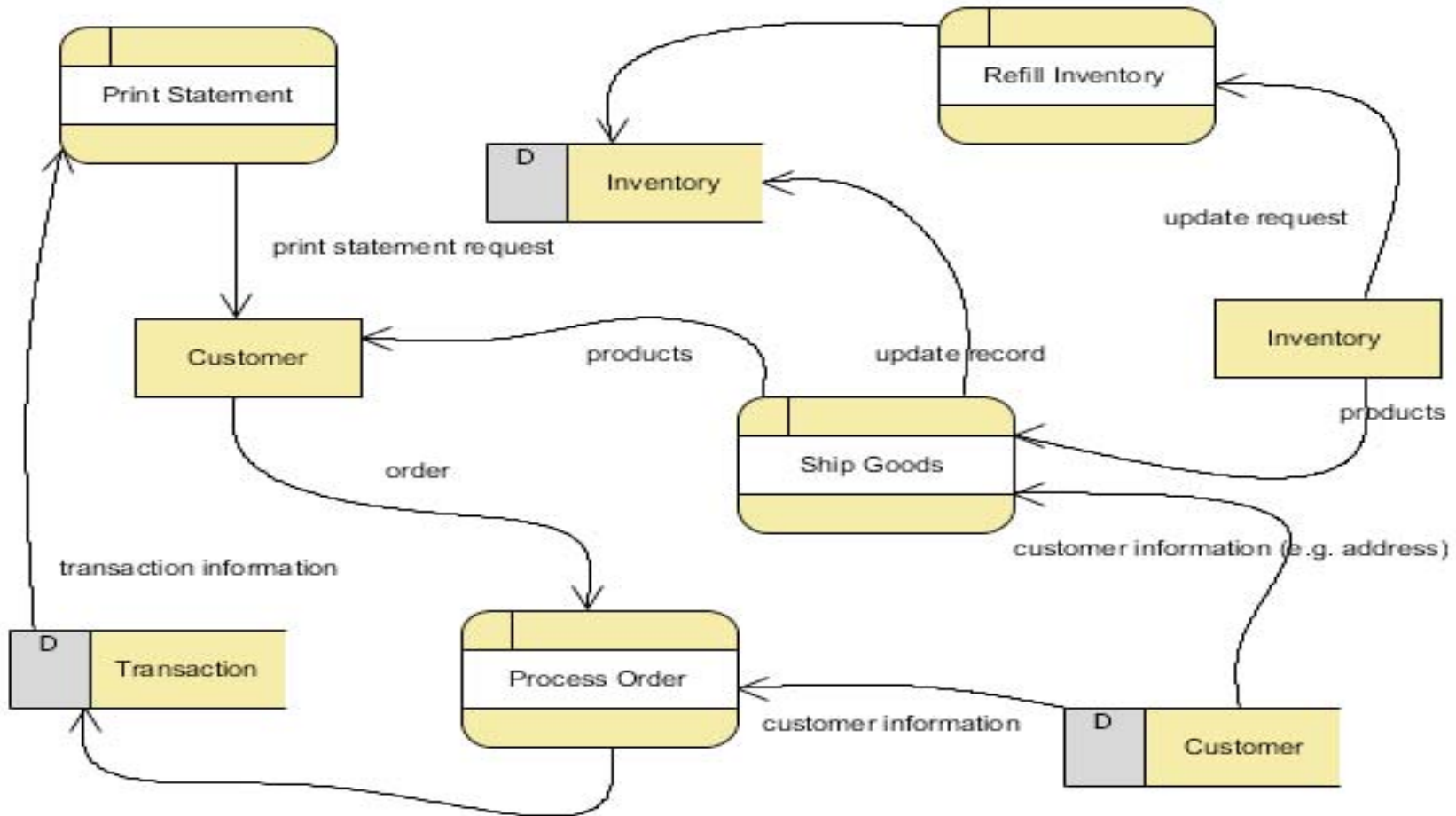


Understand what data you collect

- What type of data is being collected?
- How is that data collected?
- Where do you collect data?
 - Online/Offline
 - What countries do you do business in?
- What is the source of the data?
 - Appending collected data with data from third party sources
- What obligations are associated with the data you collect?
 - Regulatory
 - Legal/Contractual

- To provide requested services?
- Marketing?
- Are there limitations on use of the data?
 - Regulatory
 - Contractual
- What choices do you provide around the use of data?
- Where do you transfer your data to?
 - Countries
 - Other companies: service providers, third party partners

Sample Data Flow



- Access
 - Who has access to the data?
 - Employees, service providers, other third parties?
 - Can the data subject request access to review, correct, or update their data?
 - How do you verify or authenticate the identity of the party accessing or requesting access to the data?
- Security
- Data Quality and Integrity
- Data Retention
- Training
 - Making employees aware of data management policies

www.example.com Privacy Policy

Policy Summary

Full Policy

Effective Jan 1, 2011

This privacy statement describes how [www.example.com](#) collects and uses your personal information. The privacy practices of this company have been certified by TRUSTe for compliance with our [Privacy Certification Requirements](#).



Info About Your Privacy



Data Uses w/ Choice »

Your data is used to create a profile about you based upon your past purchases and/or to send you marketing communications. You can opt-out by emailing privacy@example.com. [learn more »](#)



Data Shared w/ Choice »

Your data is shared with other companies, so they can directly market their products or services to you. You can opt-out by emailing ads@example.com. [learn more »](#)



Tracking w/ Choice »

Other companies collect data from this and other independent websites to provide you with relevant ads. If you do not want your data used for this purpose you can [opt-out here](#). [learn more »](#)

Your Choices

Privacy Concerns

Site Contact Info

Example.com
100 Market St, Suite 100
San Francisco, CA 94103
customerservice@example.com

TRUSTe Dispute Resolution

If a TRUSTe client has violated its privacy agreement you can file a complaint with [TRUSTe Dispute Resolution »](#)

Privacy Tools

Set Your Ad Preferences

Learn about interest-based advertising and how your information is used- [Ad Preference Manager »](#)

Set persistent opt-outs in Firefox- [Download the Privacy Manager »](#)

- High standards in data management are crucial as information has become increasingly
 - Global
 - Regulated
 - Complex

- As a result, businesses are increasingly accountable

Clients

Partners

Consumers

Watchdogs

Press

Regulators

- Executive dashboard eliminates organizational silos around data practices
- Actionable awareness minimizes unhappy surprises with all your stakeholders
- Transparency allows for deeper revenue ties with clients & partners
- Monitoring and certification by a recognized 3rd party gives public stakeholders credible oversight:
 - Agencies, trading desks, publishers, brand marketers, press, regulators, etc.



Privacy = No Surprises

- Advertisers
- Clients
- Partners
- Consumers
- Regulators

We provide privacy solutions that help
you avoid unhappy surprises



- Providing privacy solutions since 1997
- Unique combination of technology and legislative knowledge
- Online privacy solutions for all major online customer channels, including:



Advertising



Mobile



Cloud



Websites



Questions???



Thank You!

Joanne Furtsch

jfurtsch@truste.com

[@privacygeek](#)