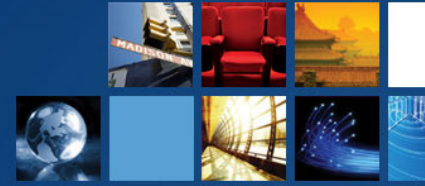




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## DAA Issues New Guidelines for Online Collection and Use of “Multi-Site Data”

December 5, 2011 by leuan Jolly

The Digital Advertising Alliance (DAA) has announced a new set of guidelines that significantly expands the requirements for member companies that collect data online. The [Self-Regulatory Principles for Multi-Site Data](#) establish broad and comprehensive standards governing the collection and use of data from an individual's device, regarding internet viewing over time and across non-affiliated web sites – what DAA is calling “Multi-Site Data.” These guidelines go well beyond DAA's existing [guidelines](#) governing the collection and use of data for online behavioral advertising (OBA). They apply to data that is collected for any and all purposes (not just OBA), with limited exceptions, and explicitly prohibit the collection of data for specific purposes related to employment, health care, credit and insurance.

The guidelines apply to “any entity” that collects Multi-Site Data, including “First Parties” (defined as “the entity that is the owner of the Web site or has Control over the Web site with which the consumer interacts and its Affiliates”) and their affiliates, “Third-Parties” (defined as an entity that “collects Multi-Site Data on a non-Affiliate's Web site”) and Service Providers (including, for example, an internet service provider or provider of a toolbar or internet browser).

The new guidelines will become part of the DAA's self-regulatory program and member companies will be required to comply with them some time in 2012. Companies that fail to comply may be investigated and if a potential violation is found to exist, the company will be advised on how it can achieve full compliance. In cases where a company does not cooperate and there is evidence of continued non-compliance, results of the investigation may be made public. Enforcement actions may also include censure, suspension or expulsion from membership of the DAA's member organizations. Non-compliance that may also be a violation of federal or state law will be referred to the appropriate law enforcement authorities.

Click [here](#) for our alert summarizing the key provisions of the new Multi-Site Data Principles.

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