

## **WOMMA Releases Perspective on Privacy to Help Brands Protect Their Consumers**

## October 31, 2011 by Jessica B. Lee

The Word of Mouth Marketing Association (WOMMA) recently released its Perspective on Privacy, a draft of preliminary recommendations designed to help brands incorporate privacy protections into their company's culture. The recommendations in the Privacy Initiative are drafted as aspirational core principles, and will not be mandated or required guidelines for the industry.

## Some of the Recommendations include:

- 1. Be transparent, open, and honest about the Personally Identifiable Information ("PII") brands collect and use;
- 2. Limit the use of PII collected;
- 3. Only collect PII that is relevant and necessary to accomplish the specified purposes;
- 4. Retain PII only as long as necessary to fulfill the specified purposes;
- 5. Provide mechanisms for appropriate consumer review, access, and correction of PII that they maintain, to the extent practicable;
- 6. Keep PII about consumers accurate and up-to-date;
- 7. Adopt security measures to protect PII based on the sensitivity of the information, the nature of the brand's business, and the reasonable protections available;
- 8. Provide consumers with a readily accessible means to express concerns or complaints regarding adherence to these principles and make a commitment to respond to such concerns appropriately.

WOMMA invited members and industry leaders to provide public comments and questions concerning its Privacy Initiative. The Board of Directors have said they will consider all comments and finalize the Privacy Initiative before announcing it to their membership.

This publication may constitute "Attorney Advertising" under the New York Rules of Professional Conduct and under the law of other jurisdictions.

© 2011 Loeb & Loeb LLP. All rights reserved.