Before the
FEDERAL TRADE COMMISSION
Washington, DC 20580

In the Matter of	)
	)
Complaint and Request for Investigation of	)
General Mills, Inc.'s Violation of the	)
Children's Online Privacy Protection Act in	)
Connection with TrixWorld.com and	)
ReesesPuffs.com	)

COMPLAINT AND REQUEST FOR INVESTIGATION

Submitted by

Center for Digital Democracy
American Academy of Child and Adolescent Psychiatry
Berkeley Media Studies Group
Campaign for a Commercial-Free Childhood
Center for Media Justice
Center for Science in the Public Interest
Children Now
Consumer Action
Consumer Federation of America
Consumer Watchdog
ChangeLab Solutions
Global Action Project
Media Literacy Project
Privacy Rights Clearinghouse
Public Citizen
Public Health Advocacy Institute
Rudd Center for Food Policy & Obesity at Yale

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August 22, 2012

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The Center for Digital Democracy ("CDD"), by its attorneys, the Institute for Public Representation ("IPR"), joined by American Academy of Child and Adolescent Psychiatry, Berkeley Media Studies Group, Campaign for a Commercial-Free Childhood, Center for Media Justice, Center for Science in the Public Interest, Children Now, Consumer Federation of America, Consumer Watchdog, ChangeLab Solutions, Global Action Project, Media Literacy Project, Privacy Rights Clearinghouse, Public Citizen, Public Health Advocacy Institute, and Rudd Center for Food Policy & Obesity at Yale (collectively, "Children's Privacy Advocates"), ask the Federal Trade Commission ("FTC") to investigate and bring an action against General Mills, Inc. for operating the websites TrixWorld.com and ReesesPuffs.com in violation of the Children's Online Privacy Protection Act ("COPPA"). Both of these websites are directed at children under age 13 and they collect personal information from children without giving clear and understandable notice to parents and without even attempting to obtain verifiable parental consent.

I. Background

General Mills, Inc. is one of the largest food companies in the world. In fiscal year 2012, global net sales for General Mills were $16.7 billion.[1] In a single day, General Mills provides 60

[1] General Mills, Company: Businesses,

million servings of ready-to-eat cereals.[2] General Mills' brands of ready-to-eat cereals include several that are popular with children, including "Reese's Puffs" and "Trix." General Mills was founded in 1856 and is headquartered in Minneapolis, Minnesota.[3]

TrixWorld.com and ReesesPuffs.com are sophisticated interactive websites promoting sweetened cereals of the same name to children under the age of 13. General Mills includes both products in the list of "better-for-you products" that may be marketed to children under the Children's Food and Beverage Advertising Initiative guidelines.[4]

The sites offer "advergames"—online video games that promote General Mills' products. These websites not only encourage children to spend time playing in the General-Mills-branded environment, but they encourage them to facilitate viral marketing by supplying the email addresses of their friends, so that General Mills can send the friends emails urging them to visit the website and play the advergames as well.

II. General Mills' Child-Directed Websites ReesesPuffs.com and TrixWorld.com Fail to Comply with the Children's Online Privacy Protection Act

COPPA makes it unlawful for any operator of a website directed to children to collect personal information from a child unless it complies with certain requirements. These

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http://www.generalmills.com/en/Company/Businesses.aspx (last visited August 21, 2012).

[2] General Mills, Brands, http://www.generalmills.com/Brands.aspx (last visited August 21, 2012).

[3] General Mills, Company, http://www.generalmills.com/Company.aspx (last visited August 21, 2012).

[4] Children's Food & Beverage Advertising Initiative, *Food and Beverage Products that Meet Participants' Approved Nutrition Standards that May Be in Child-Directed Advertising* (July 2012), *available at* http://www.bbb.org/us/storage/16/documents/cfbai/CFBAI%20Product%20List%20July%202012%20.pdf.

requirements include providing notice of the information collection and obtaining "verifiable parental consent for the collection, use or disclosure of personal information from children."[5]

A. TrixWorld.com and ReesesPuffs.com Are Directed to Children Under the Age of 13

A company is subject to COPPA if it operates a website directed to children, defined as "an individual under the age of 13."[6] Both of these sites are clearly directed to children under age 13. Indeed, the homepages of both sites inform children in the upper right of the screen: "Hey kids, this is advertising."[7]

The subject matter and visual and audio content of both sites also appeal to children. The TrixWorld.com homepage features the well-known animated character known as "Silly Rabbit."[8] It has jokes, games, surveys and worlds to explore such as Rabbitopolis that appeal to kids. Clicking on "Rock Out with Wildberry Red Swirls" allows the child to make a customized video promoting Trix cereal and share it with friend.

The ReesesPuffs.com homepage looks like a sketchbook. Children are invited to "Show us your moves" in the "Dance Battle." [9] Clicking on the sketch book allows the child to create an avatar, make a customized dance video, submit it to be "judged" by an "American Idol" style panel, and to share it with a friend. They can also watch videos made by others or make their own "mix" of the "Reese's Puffs Rap."

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[5] 15 U.S.C. § 6502.

[6] 16 CFR § 312.2-3.

[7] *See, e.g.*, Appendix A at Figures 1-4. This disclosure is also shown on many of the subsequent screens, but may not appear in these screenshots in the Appendix that were cropped to focus on other aspects of the websites.

[8] *See* Appendix A at Figure 1.

[9] *See* Appendix A at Figure 2.

The privacy policy for TrixWorld.com makes clear that it is intended for children.[10] The privacy policy for ReesesPuff.com, however, states that "[t]his website is not directed to children."[11] This claim is flatly contradicted by the content of the site itself. While the animated avatars may look more like teens than young children, that does not make the website any less appealing to children. And unlike many other sites that are not intended for children, the website does not state that there is a minimum age requirement or provide any disclosure to that effect apart from the privacy statement. Although the site conceivably could attract teens as well as children, that does not relieve General Mills from complying with COPPA.[12] Moreover, ReesesPuffs.com is promoted on packages of Reese's Puffs cereal in a way that is clearly designed to appeal to children under 13.[13]

B. General Mills Collects Personal Information from Children on TrixWorld.com and ReesesPuffs.com

TrixWorld.com and ReesesPuffs.com collect personal information from children. To illustrate how these sites collect personal information, IPR took screenshots of our experience testing games on each of these sites.

In the Rock Video Maker game on TrixWorld.com, children can use buttons that appear on the screen to select a performance venue where Silly Rabbit will perform, such as "The Swirl Room" or "Fruitalicious Avenue," as well as the type of electric guitar. During the video, the child can control the moves of the Silly Rabbit on stage, the visuals, and the reaction of the

[10] *See* Appendix B.
[11] See Appendix C at C-6.
[12] See Children's Online Privacy Protection Rule: Final Rule, 64 Fed. Reg. 59,888, 59,893 (1999) (stating that when websites are directed to both children and teens the FTC "will look closely at the sites . . . it if appears that their operators are trying to avoid compliance" with the COPPA Rule.).
[13] See Appendix D.

crowd.[14] For example, if the child clicks on one of the crowd buttons, the audience members hold up boxes of Trix cereal.

When a child finishes recording a rock video in TrixWorld.com's Rock Video Maker, she is encouraged to "share your video" by providing her name and her friend's email address. The form does not ask for a first name only. Moreover, our investigation found that nothing stops the child from entering in her full name (we were able to enter in the simulated full name "Coppa ResearchOne").[15] After the child clicks "send," the recipient child receives an email from TrixWorld.com stating, "[Name] just directed a Rocking' music video with the Trix Wildberry Red Rock Video Maker! CLICK HERE TO WATCH & DIRECT YOUR OWN!"[16]

On ReesesPuffs.com's "Dance Battle," children can create avatars for themselves by choosing a name, body type, skin color, hairdo, clothing and "bling." Next they can practice and record a video, using the keys on their keyboard to make their avatar dance.[17]

When a child finishes recording a dance, she is encouraged to "share your Reese's Puffs Dance" by providing her first name, her friend's first name and her friend's email address.[18] However, as with the TrixWorld.com share form, our investigation discovered that nothing stops a child from entering full names (we used the simulated full names "Coppa ResearchOne" and "Coppa ResearchTwo").[19] Moreover, if a child clicks on the "tell a friend" button on the homepage instead, the form that appears simply asks for "name," instead of first name.

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[14] *See* Appendix A at Figure 3.

[15] *See* Appendix A at Figure 4. Many other parts of TrixWorld.com also have share a friend features. For example, if a child plays the game Fruitalicious, in which the object is to collect enough Trix Puffs to become King of Trix World, she is also invited to send a secret message to a friend. See http://trixworld.com/TrixWorld.html. The friend has to click through to TrixWorld.com to decipher the message.

[16] *See* Appendix A at Figure 5.

[17] *See* Appendix A at Figure 6.

[18] *See* Appendix A at Figure 7.

[19] *Id.*

After the child clicks "send," the recipient child receives an email from ReesesPuffs.com stating, "Hey! Your buddy has been stepping it up using REESE'S Puffs Dance Battle tool. Simply click on the link to view and rate your friend's moves – then create your own avatar and dance!"[20]

The share forms on both sites collect personal information from children. The COPPA Rule defines "collects" as "the gathering of any personal information from a child by any means, including but not limited to . . . [r]equesting that children submit personal information online."[21] An operator need not store the information it receives to "collect" it. As the Commission explained in its Statement of Basis and Purpose when it published the COPPA Rule in 1999, "the definition of collects or collection has been modified to cover any request by the operator that children submit information online."[22]

The COPPA Rule defines "personal information" as "individually identifiable information about an individual collected online."[23] This includes "an e-mail address or other online contact information, including but not limited to an instant messaging user identifier, or a screen name that reveals an individual's e-mail address."[24] Email addresses thus indisputably constitute personal information under the rule.

C. General Mills' Collection of Children's Personal Information Does Not Comply with the COPPA Rule

Under COPPA, collecting personal information from a child constitutes unfair and deceptive trade practice in violation of Section 5 of the Federal Trade Commission Act unless the site operator complies with the notice and consent provisions set forth in the COPPA Rule.

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[20] *See* Appendix A at Figure 8.
[21] 16 C.F.R. § 312.2(a).
[22] Children's Online Privacy Protection Rule: Final Rule, 64 Fed. Reg. 59,888, 59,889 (1999).
[23] 16 C.F.R. § 312.2.
[24] 16 C.F.R. § 312.2(c).

1. General Mills Fails to Comply with COPPA's Notice Requirements

The COPPA Rule requires that any website directed to children that collects personal information from children provide notice "of what information it collects from children, how it uses such information, and its disclosure practices for such information."[25] All notices must be clearly and understandably written, be complete, and must contain no unrelated, confusing or contradictory materials. Further, the COPPA Rule specifies that the website operator "must post a link to a notice of its information practices with regard to children on the home page . . . and at each area on the website . . . where personal information is collected from children."[26]

General Mills links to two different privacy policies from the homepages of TrixWorld.com and ReesesPuffs.com. Those privacy policies are attached as Appendices B and C. Neither provides a complete or accurate description of what information the sites collect from children, how they use such information, or their disclosure practices.

The privacy policy at TrixWorld.com states in relevant part:[27]

> **Online Privacy Policy**
>
> Last updated: January 2005
>
> General Mills is committed to providing a fun, entertaining, and safe online experience to people of all ages that may visit this site, and we take special care to protect the privacy of children under the age of 13. We have developed our privacy practices based on guidelines established by the Children's Advertising Review Unit of the better Business Bureau (CARU) and in compliance with the requirements established by the Children's Online Privacy Protection Act of 1998 (COPPA). We also recommend that parents monitor their children's internet activities and learn to employ software or other tools that can help children enjoy the fun and entertainment of an online experience without compromising their personal safety or allowing them to use the internet in a manner inconsistent with their parents' preferences.

[25] 16 C.F.R. § 312.3-4.
[26] 16 C.F.R. § 312.4(b).
[27] http://www.sillyrabbit.com/privacy.html (last visited August 19, 2012).

* * *

From time to time, however, we may request limited personal information from a child (such as name or email address) in order for that child to participate in particular activities at this site. Except in special, limited circumstances, we do not collect such information from a child under 13 without the prior consent of a parent/guardian. When we ask for consent, we will tell the parent/guardian what we will do with the information that their child provides to us, how they can review their child's information, and how they can request us to delete it. General Mills does not condition a child's participation in any activity on the website on a child's disclosure of more information than is reasonably necessary to conduct the activity.

As mentioned above, from time to time, we may collect information at this site from a child under 13 without prior consent of a parent/guardian, but only in these special, limited circumstances:

1. We may seek a child's name and a parent/guardian's email contact information to seek the parent/guardian's consent or to provide them with a notification.

2. We may seek a child's name and email address in order to respond on a one-time basis to a specific request of that child. For example, if a child sends us an email request, we will hold their email address long enough to respond to them and then delete it from our system after we have provided an answer.

3. From time to time, we may have special online promotions or offers on this site that are open for registration by children under the age of 13 (for example, a sweepstakes or contest). If a child under the age of 13 wishes to participate, we will ask for a parent/guardian's name and email address so that we can notify them and give them an opportunity to complete the registration for their child or to opt out of the activity on behalf of their child. Any information that is given to us in this circumstance is used only for the purpose of conducting the activity and will be deleted from our system after conclusion of the promotion and any legally required period for keeping such information.

4. We may seek a child's name and contact information to the extent reasonably necessary to protect the safety of a child participating on our website. In this situation, the information will only be used for the purpose of protecting

> the child's safety and, as above, we will provide the parent/guardian with notice of this use.
>
> 5. We may seek a child's name and contact information to the extent reasonably necessary to protect the security or integrity of our website; to take precautions against liability; to respond to judicial process; or (to the extent permitted by law) to provide information to law enforcement agencies or for an investigation on a matter related to public safety. Such information will not be used for any other purpose.

This Privacy Policy fails to comply with the COPPA Rule and is deceptive because it claims that "Except in special, limited circumstances, we do not collect such information from a child under 13 without the prior consent of a parent/guardian." The Policy identifies five limited circumstances in which the site may collect information from a child without advance parental consent. These circumstances track mirror the exceptions contained in the COPPA Rule. But the Privacy Policy does not say anything about collections of names and email addresses in without parental consent in order for children to use the Tell-a-Friend features. Moreover, since the tell-a-friends features are offered throughout the website, they cannot be considered "special, limited circumstances."

The Privacy Policy is also confusing and contradictory. It claims that "we take special care to protect the privacy of children under the age of 13" when in fact, the website is collecting children's email addresses and for viral marketing purposes without parental notice or verifiable advance consent.

While there is a link to the privacy policy on the "Share Your Video" screen, it does not say that children need to ask their parents before providing the information or indeed, make any mention of parents at all. Thus, TrixWorld.com violates COPPA Rule 312.4(c), which requires a website operator to "make reasonable efforts . . . to ensure that a *parent* of a child receives notice of the operator's practices with regard to the collection, use, and/or disclosure of the child's personal information" (emphasis added).

The privacy policy at ReesesPuffs.com states in relevant part:[28]

> **Privacy policy**
>
> Effective Date: June 11, 2012
>
> At General Mills, we are very sensitive to the privacy concerns of visitors to all of our websites, including our pages and applications on third-party social-networking services such as Facebook or Twitter and our applications on mobile devices. We know that maintaining your trust requires that we protect your privacy. This Privacy Policy explains our online information practices at this website and the choices that you, as a visitor to this website, can make about the collection and use of your information.
>
> * * *
>
> **Send-to-a-friend tools** This website may, from time to time, include a send-to-a-friend application that makes it easy for you to forward information or materials from our website to friends or family by e-mail. In order to address your e-mail message, the application may ask you to input the recipient's e-mail address and/or similar information (including your e-mail address). This information is only used by the application to address your message so that it can be properly sent. General Mills does not retain any of this information for any purpose.
>
> **Children's privacy** This website is not directed to children and we will not request any information from children under 13 at this website. General Mills does have other websites that are geared in whole or in part to a child audience. Our commitment to the privacy of children is described more fully in the privacy policies of those websites. General Mills and its affiliated companies take special care to protect the privacy of children under the age of 13. We have developed our privacy practices as they relate to children from guidelines established by the Children's Advertising Review Unit (CARU) and in compliance with the requirements established by the Children's Online Privacy Protection Act of 1998 ("COPPA"). We also recommend that parents monitor their children's Internet activities and learn and employ software or other tools which can help their children enjoy the fun and entertainment of an on-line experience without compromising their personal safety or allowing them to use the Internet in a manner inconsistent with their parents' preferences.

[28] http://www.generalmills.com/en/privacy_policy.aspx (last visited August 19, 2012).

Unlike TrixWorld.com's Privacy Policy, this one discloses that it collects personal information to use "Send-to-a-friend tools." However, the Privacy Policy is at a minimum confusing, if not deceptive, in claiming that it is not intended for children under age 13.[29] ReesesPuffs.com also violates COPPA Rule 312.4(c), which requires a website operator to "make reasonable efforts . . . to ensure that a *parent* of a child receives notice of the operator's practices with regard to the collection, use, and/or disclosure of the child's personal information" (emphasis added).

2. General Mills Fails to Comply with COPPA's Requirement that it Obtain Verifiable Parental Consent Before Collecting Personal Information From a Child

COPPA Rule 312.5 requires the website operator to "[o]btain verifiable parental consent prior to any collection, use, and/or disclosure of personal information from children." Neither TrixWorld.com nor ReesesPuffs.com makes any attempt to obtain parental consent before collecting a child's personal information.

3. General Mills' Collection of Email Addresses Is Not Exempt Under COPPA's One-Time Contact Exception

General Mills' collection of children's personal information without giving notice to parents and obtaining verifiable parental consent does not fall within any of the COPPA exceptions. COPPA Rule 312.5(c) sets forth five exceptions to the consent requirement, only one of which arguably has any relevance here.[30] COPPA Rule 312.5(c)(2) provides that verifiable parental consent is not required "[w]here the operator collects online contact information from *a child* for the sole purpose of responding directly on a one-time basis to a specific request from

[29] See supra at p. 4.

[30] The other exemptions are for collecting the parent's address for purposes of obtaining consent, or where disclosure is necessary to protect the safety of the child.

the child, and where such information is not used to recontact *the child* and is deleted by the operator from its records."[31]

It is clear from the language that the terms "a child" and "the child" refer to the same child. The FTC anticipated that this exception would apply when a child requested homework help or a copy of a document.[32] When General Mills collects the email address of a child's friend for the purpose of sending marketing messages to that friend, the child's friend has not requested that General Mills send her anything. Thus, General Mills' collection of email addresses is not exempt under the plain language of §312.5(c)(2).

4. General Mills' Collection of Personal Information Does not Follow the Guidance in the FTC's Frequently Asked Questions

The FTC's website has a document titled "Frequently Asked Questions about the Children's Online Privacy Protection Rule" (FAQ) that is intended to supplement other compliance materials on the FTC website. Only one question, Question 44, addresses practices similar to the share function utilized by General Mills.

> **44. My child-directed website wants to offer electronic post cards and the ability for children to forward items of interest on my site to their friends. Can I take advantage of one of the email exceptions to parental consent?**
>
> It depends on how you design your e-card or forward-to-a-friend system. Any system providing the opportunity to reveal any personally identifiable information (PII) other than the recipient's email address requires you to obtain heightened verifiable consent from the sender's parent, and does not fall within one of COPPA's limited exceptions. This means that if your e-card/forward-to-a-friend system permits PII to be disclosed in either the "from" or "subject" lines, or in the body of the message, then you must notify the sender's parent and obtain parental consent using one of the more reliable methods to obtain verifiable consent enumerated in the Rule *before* collecting any PII from the child.

[31] 16 C.F.R. § 312.5(c)(2) (emphasis added).

[32] Children's Online Privacy Protection Rule: Final Rule, 64 Fed. Reg. 59,888, 59,902 (1999).

> In order to take advantage of COPPA's one-time contact exception for your e-cards, your webform may only ask for recipient's email address (and, if desired, sender and/or recipient's first name and last initial). Your e-card system must not permit the sender to enter her full name, her email address, or the recipient's full name. In addition, you may not provide users with the ability to freely type messages in either the subject line of the e-card or in any text fields.
>
> Finally, you should immediately send the e-card, and then automatically delete the recipient's email address after sending. If you choose to retain the recipient's email address until some point in future (*e.g.*, until e-card is opened by the recipient, or if you allow the sender to indicate a date in the future when the e-card should be sent), you must collect the sender's parent's email address and provide notice and opt-out to sender's parent *before* the e-card is sent. *See* Statement of Basis and Purpose, 64 Fed. Reg. 59888 *et seq.*, available at www.ftc.gov/os/1999/10/64fr59888.pdf, p. 59902, n.222

This guidance may not apply to ReesesPuffs.com and TrixWorld.com at all. It refers to "e-cards" and "forward to a friend features," suggesting that the guidance was intended to allow children to send birthday cards and holiday greetings to their friends, or to forward an article of interest—not to allow children to be used for viral marketing.[33]

Even if the guidance applies here, General Mills has failed to follow its restrictions. FAQ 44 specifies that "your webform may only ask for recipient's email address (and, if desired, sender and/or recipient's first name and last initial). Your e-card system must not permit the sender to enter her full name, her email address, or the recipient's full name." As our investigation has shown, some of the webforms on these sites simply ask for "name," and even those that ask for only a first name nonetheless permit child to enter both a first and last name.[34]

[33] According to the FAQ, Question 44 was revised on October 7, 2008. Children's Privacy Advocates have not been able to find any additional information about the purpose of the question or the revision.

[34] *See* Appendix A at Figures 4, 7.

III. Conclusion

For the foregoing reasons, Children's Privacy Advocates respectfully request that the FTC take prompt against General Mills for its collection of personal information from children in violation of COPPA. By failing to comply with its obligation to provide notice of its privacy practices and obtain verifiable consent from parents before collecting personal information from children, General Mills endangers children's privacy, exposes children to intrusive marketing behind parents' backs, and violates the FTC's regulations.

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August 21, 2012

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Appendix A: ReesesPuffs.com and TrixWorld.com Screenshots

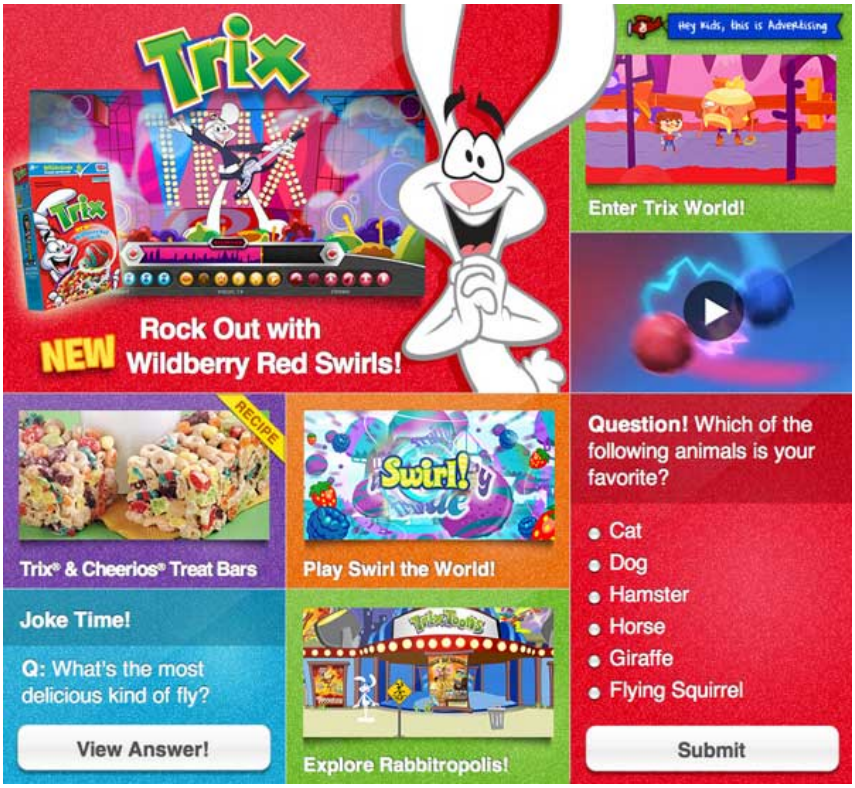

Figure 1
TrixWorld.com Homepage

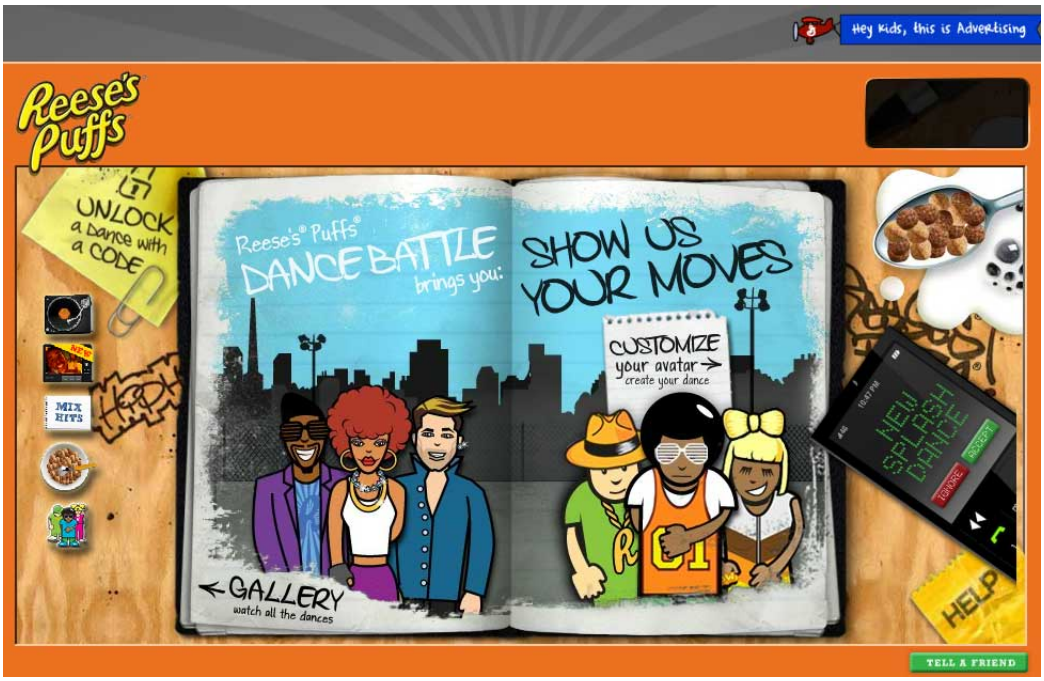

Figure 2
ReesesPuffs.com Homepage

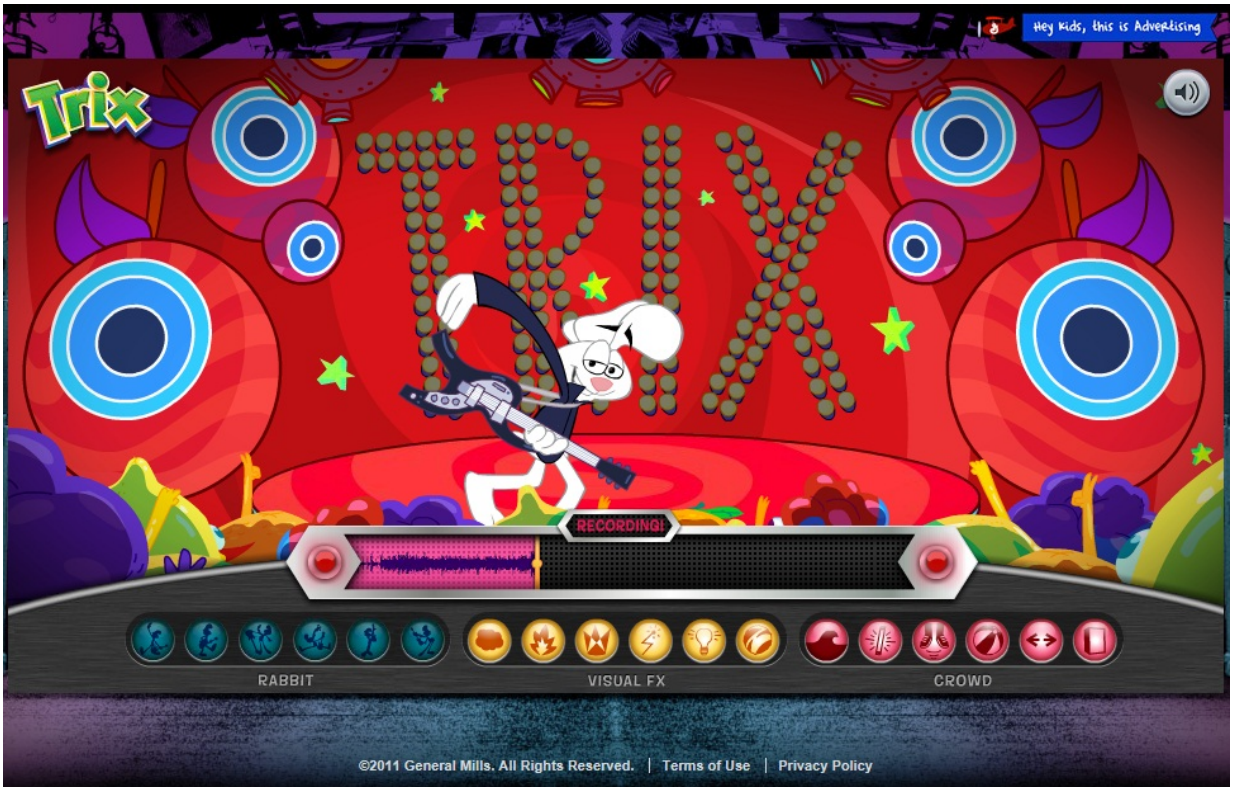

Figure 3
TrixWorld.com Rock Video Maker Game

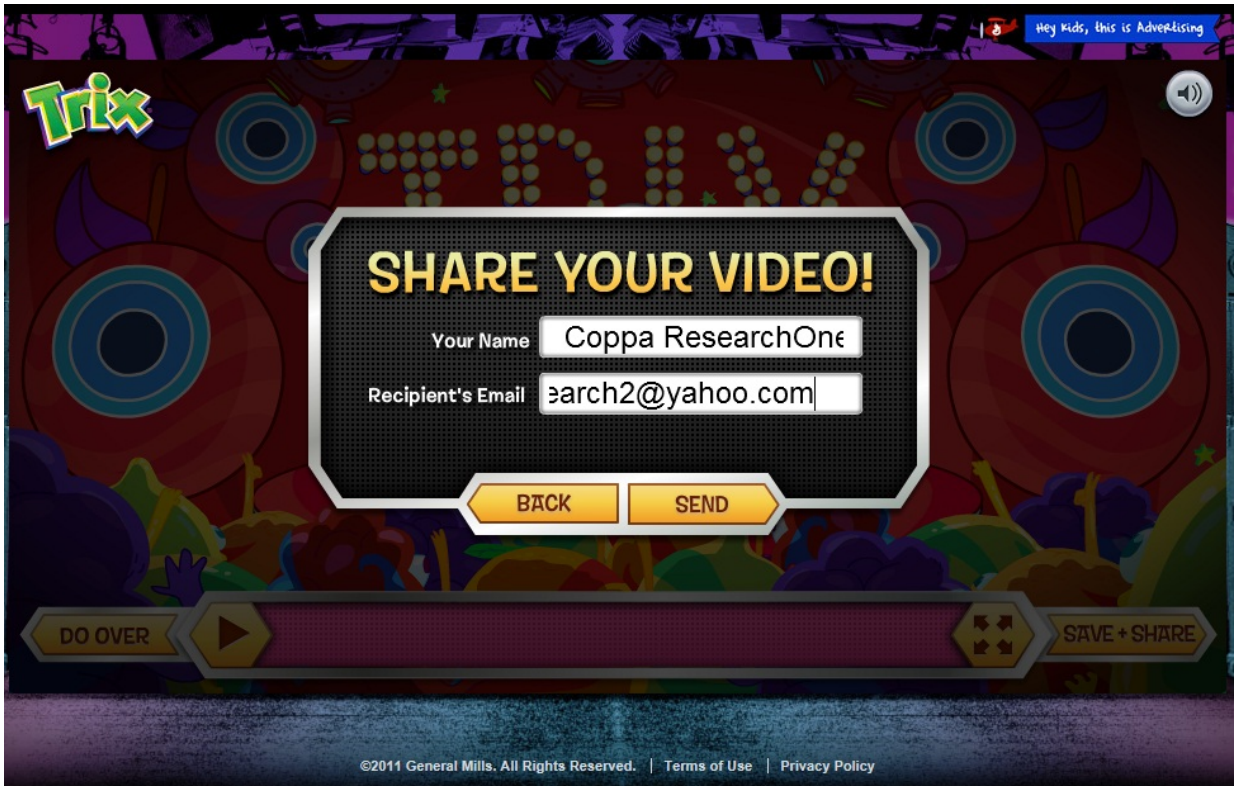

Figure 4
TrixWorld.com Share Form

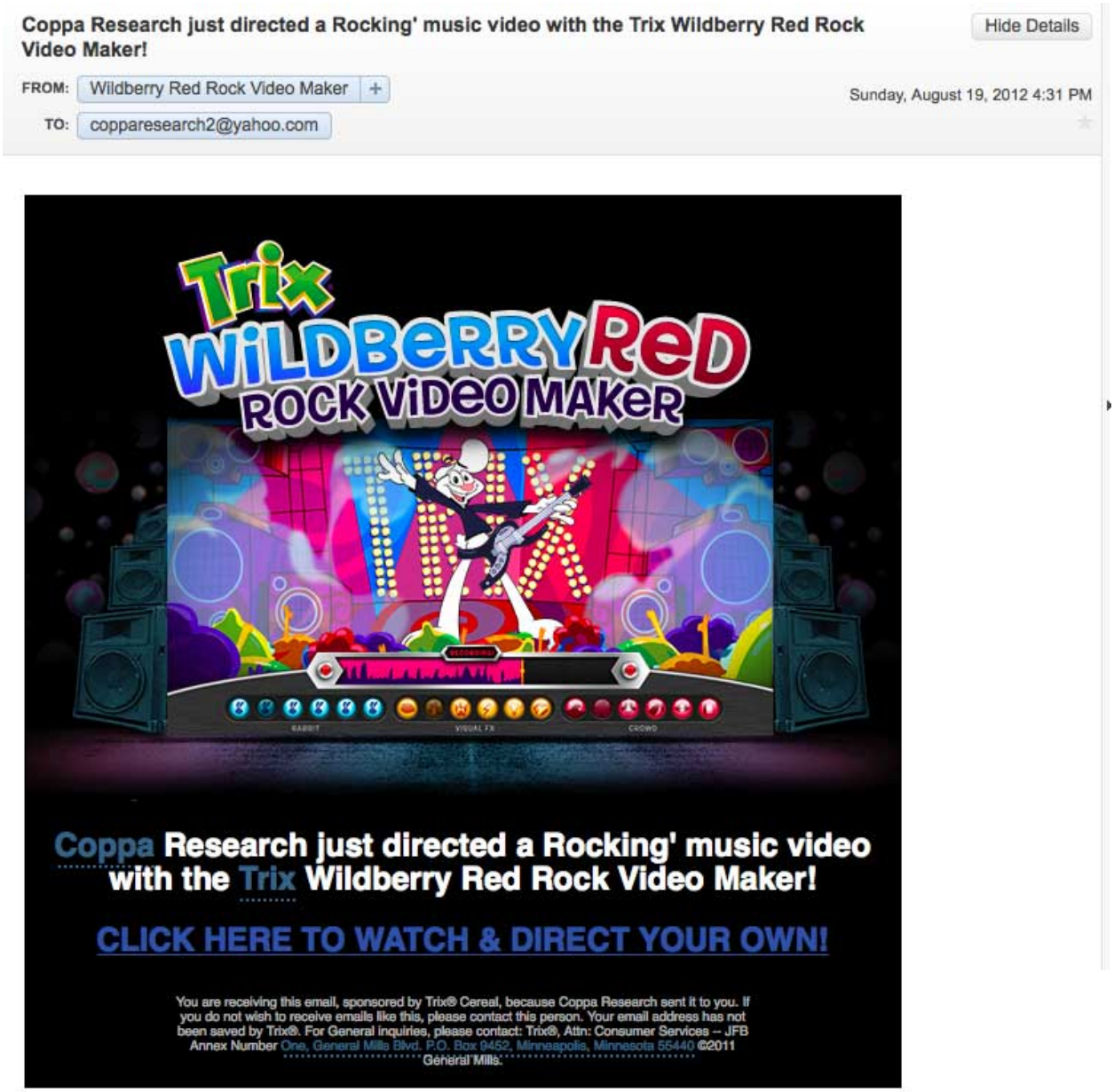

Figure 5
TrixWorld.com Recipient Email

Figure 6
ReesesPuffs.com Dance Battle Game

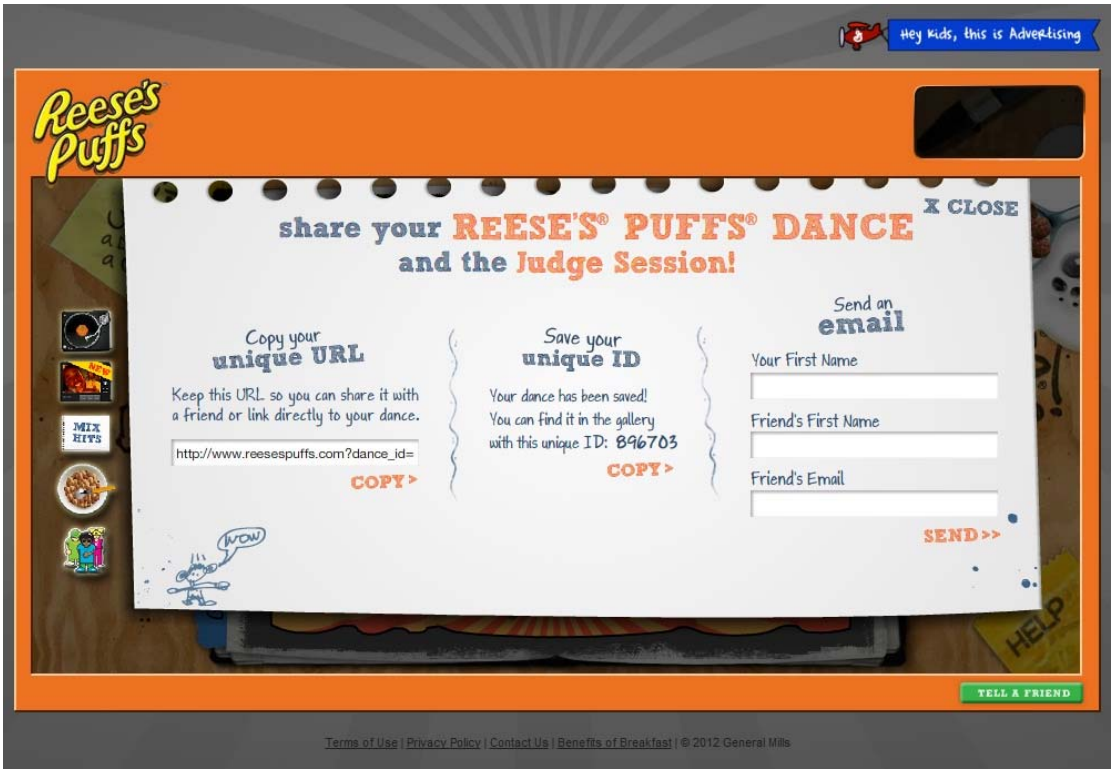

Figure 7
ReesesPuffs.com Share Form

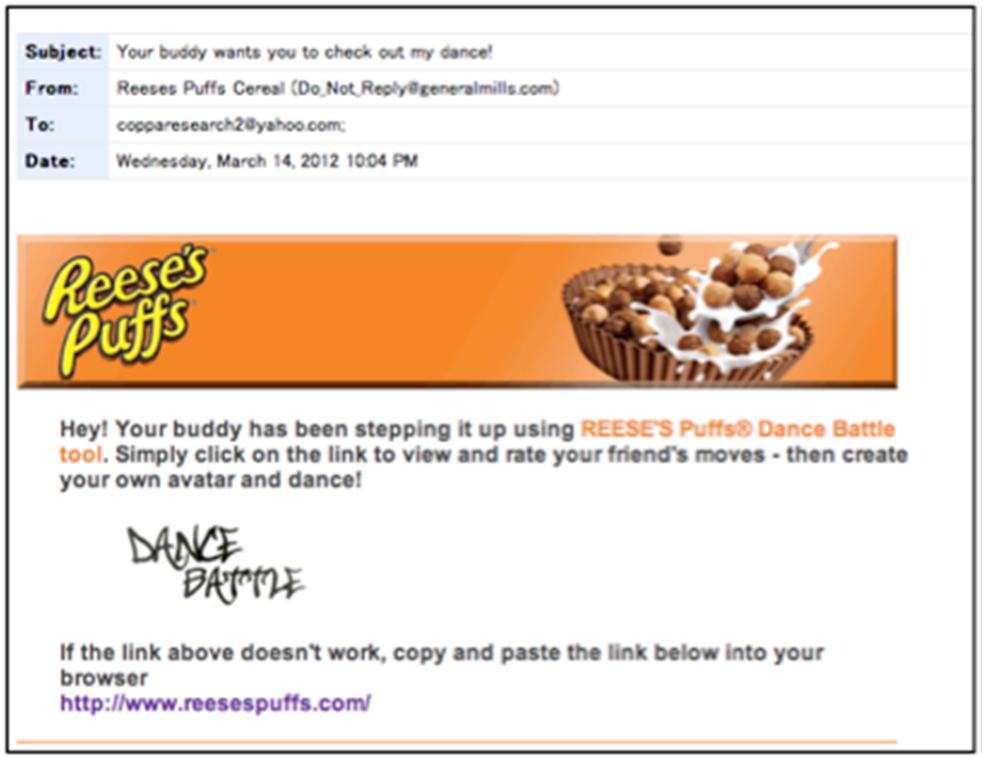

Figure 8
ReesesPuffs.com Recipient Email

Online Privacy Policy[35]

Last updated: January 2005

General Mills is committed to providing a fun, entertaining, and safe online experience to people of all ages that may visit this site, and we take special care to protect the privacy of children under the age of 13. We have developed our privacy practices based on guidelines established by the Children's Advertising Review Unit of the better Business Bureau (CARU) and in compliance with the requirements established by the Children's Online Privacy Protection Act of 1998 (COPPA). We also recommend that parents monitor their children's internet activities and learn to employ software or other tools that can help children enjoy the fun and entertainment of an online experience without compromising their personal safety or allowing them to use the internet in a manner inconsistent with their parents' preferences.

What information might we collect from children and how might we use it?
At General Mills, it is our policy to create website experiences for children that require limited or no collection of personal information. Generally, we limit our collection of information to non-personally identifiable information that is gathered through a child's voluntary submission to us or through the use of cookie, web beacon, or similar technology.

From time to time, however, we may request limited personal information from a child (such as name or email address) in order for that child to participate in particular activities at this site. Except in special, limited circumstances, we do not collect such information from a child under 13 without the prior consent of a parent/guardian. When we ask for consent, we will tell the parent/guardian what we will do with the information that their child provides to us, how they can review their child's information, and how they can request us to delete it. General Mills does not condition a child's participation in any activity on the website on a child's disclosure of more information than is reasonably necessary to conduct the activity.

As mentioned above, from time to time, we may collect information at this site from a child under 13 without prior consent of a parent/guardian, but only in these special, limited circumstances:

1. We may seek a child's name and a parent/guardian's email contact information to seek the parent/guardian's consent or to provide them with a notification.
2. We may seek a child's name and email address in order to respond on a one-time basis to a specific request of that child. For example, if a child sends us an email request, we will hold their email address long enough to respond to them and then delete it from our system after we have provided an answer.
3. From time to time, we may have special online promotions or offers on this site that are open for registration by children under the age of 13 (for example, a sweepstakes or contest). If a child under the age of 13 wishes to participate, we will ask for a parent/guardian's name and email address so that we can notify them and give them an

[35] Current as of August 19, 2012. *Available at* http://www.sillyrabbit.com/privacy.html.

opportunity to complete the registration for their child or to opt out of the activity on behalf of their child. Any information that is given to us in this circumstance is used only for the purpose of conducting the activity and will be deleted from our system after conclusion of the promotion and any legally required period for keeping such information.

4. We may seek a child's name and contact information to the extent reasonably necessary to protect the safety of a child participating on our website. In this situation, the information will only be used for the purpose of protecting the child's safety and, as above, we will provide the parent/guardian with notice of this use.
5. We may seek a child's name and contact information to the extent reasonably necessary to protect the security or integrity of our website; to take precautions against liability; to respond to judicial process; or (to the extent permitted by law) to provide information to law enforcement agencies or for an investigation on a matter related to public safety. Such information will not be used for any other purpose.

Whenever we collect personally identifiable information at the site, the information will be used solely by General Mills or its agents or contractors for the purposes indicated at the time the child (with parental/guardian notice or consent, as applicable) provides the information. For example, if a parent registers a child in a sweepstakes, we will use the information to notify the child that he or she has won and to fulfill the sweepstakes prize. We also may transfer, disclose, or share such information with third parties who are engaged by us specifically to administer or fulfill certain online activities (e.g., conducting sweepstakes and contests). Such third parties have access to personal information needed to perform their functions, but may not use it for other purposes. Lastly, we may also disclose personally identifiable information to third parties when required by law or pertinent to judicial or government investigations or proceedings, or when otherwise necessary to protect our website or the safety of its users.

How do we use cookie, web beacons, or similar technologies?
We may employ cookie technology, web beacons, and similar devices on our site to facilitate site administration and navigation and to provide an enhanced online experience for our visitors. Information tracked through these mechanisms includes but is not limited to (1) a user's IP address (e.g., yahoo.com - 192.168.1.1), (2) the type of web browser (e.g., Microsoft Explorer) and operating system (e.g., Windows or Linux) being used, (3) the pages of the site a user visits, and (4) other websites a user visited before visiting our site.

Most browsers accept cookies automatically, but can be configured not to do so or to notify the user when a cookie is being sent. If you wish to disable cookies, refer to your browser help menu to learn how to disable cookies. Cookies do not collect or contain personally identifiable information such as your child's name or email address.

Web beacons are 1x1 single-pixel graphics that allow us to count the number of users who have visited a particular web page or to access certain cookies. We may use web beacons on our websites to count users and to recognize users by accessing our cookies. Like cookies, web beacons do not collect or contain personally identifiable information such as name or email address.

Security
We have taken steps to protect the confidentiality, security, and integrity of all information our visitors share will us. This includes setting up processes to avoid any unauthorized access or disclosure of this information.

Send-to-a-friend tools
This site may, from time to time, include a send-to-a-friend application that makes it easy for visitors to forward information or materials from our site to friends or family by e-mail. In order to address the e-mail message, the application will ask for the recipient's e-mail address and/or similar information (including the sender's e-mail address). This information is only used by the application to address the message so that it can be properly sent. General Mills does not retain any of this information for any purpose.

Contacting us regarding your child's personally identifiable information
Upon providing proper identification, parents can request review, correct, update, or have deleted their child's personally identifiable information from our database by writing to us at General Mills, Inc., Number One General Mills Boulevard, Minneapolis, MN 55426, Attn: Consumer Services. We can also be reached by telephone by dialing our consumer response department at 1-800-328-8360 weekdays from 8 a.m. - 5 p.m. Central Time. Please feel free to use this same contact information if at any time you have questions or concerns about our Privacy Policy.

Your Consent To The Terms Of This Online Privacy Policy
By using this website, you signify your assent to all of the terms of this General Mills Online Privacy Policy and our Terms of Use. If you do not agree with any term of this General Mills Online Privacy Policy or our Terms of Use, please do not use this site or submit any personally identifiable information.

Changes to this policy
General Mills reserves the right to change our practices and this site's Privacy Policy at any time. Any changes will be reflected on this page. Therefore we recommend that you visit our Privacy Policy often so that you are always fully informed. In addition, we will send a notice to any parent informing them of any material change in the collection, use, and/or disclosure practices to which that parent previously consented.

Privacy policy[36]

Effective date: June 11, 2012

At General Mills, we are very sensitive to the privacy concerns of visitors to all of our websites, including our pages and applications on third-party social-networking services such as Facebook or Twitter and our applications on mobile devices. We know that maintaining your trust requires that we protect your privacy. This Privacy Policy explains our online information practices at this website and the choices that you, as a visitor to this website, can make about the collection and use of your information.

Personal information we may ask you for and how we might use it When you visit our website, we collect personal information from you (such as your name, address, phone number, e-mail address, etc.) when you voluntarily provide it to us. Depending on the purpose for which the information was provided, we may use the information to communicate with you regarding our products, services, and promotions, to provide you with other information or materials that you request, to customize your interactive experience, and/or to improve our product and service offerings.

Here are the circumstances in which we might ask for personal information from our consumers though our website, the types of information we obtain, and how we might use the information:

1. If you contact one of our Consumer Services Representatives through our website, we may ask you for personal information such as your name, address, phone number, or e-mail address so that we can respond to your questions or comments. (Of course, if you send us an e-mail, we will at a minimum obtain your e-mail address.)

2. You may be asked to provide personal information if you:

[36] Current as of August 19, 2012. *Available at* http://www.generalmills.com/en/privacy_policy.aspx.

Register as a user of our website or to post content to our website;
Agree to receive an online newsletter or other information or material from us;
Register for a sweepstakes, contest, or other promotion;
Register to receive coupons through our website;
Participate in a survey, a consumer research panel, or similar type of activity; or
Ask to receive an online newsletter or other information or material from us; or
Otherwise participate in features of our website that ask for personal information.
If you purchase or otherwise request a product, publication, or promotional offering from us or take advantage of a rebate or similar offer, you may be required to provide your contact and/or payment information (such as a credit card number) in order for us to process your request.

Your participation in any of these activities (and therefore your provision of personally identifiable information) is entirely voluntary. We may use the information you provide to respond to your questions or comments, to administer our promotions and websites, to fulfill your request, subscription, or order, to provide you with a customized interactive experience, or to otherwise provide or improve our products and services. Based on the information you provide, we also may obtain additional information about you, such as U.S. Postal Service address change data or demographic information, from commercially available sources.

We will not send you any online newsletter or similar e-mail marketing communication unless you expressly consent to receive such a communication from us. And if you do choose to receive any such e-mail communication from us, you will always have the opportunity to "unsubscribe" from receiving the e-mail at any time.

How do we use cookies, web beacons, or similar technologies? We may employ cookie technology, web beacons, transparent GIF images, and similar devices to facilitate website administration and navigation, to better understand and improve the effectiveness of our site, and to provide an enhanced online experience for our visitors. Information tracked through these mechanisms includes but is not limited to (1) a user's IP address (e.g., yahoo.com - 192.168.1.1), (2) the type of web browser (e.g., Internet Explorer) and operating system (e.g., Windows) being used, (3) the pages of the website a user visits, and (4) other websites a user visited before

visiting our website. These devices may also be used on our behalf by third parties managing our advertising on other websites to enable us to learn which advertisements bring visitors to our websites and to otherwise improve our online advertising.

Most browsers accept cookies automatically, but can be configured not to do so or to notify the user when a cookie is being sent. If you wish to disable cookies, refer to your browser help menu to learn how to disable cookies. Please note that if you disable cookies, you may be unable to access some customized features on our website.

Devices like web beacons and transparent GIF images are tiny or transparent graphics that allow us to count the number of users who have visited a particular web page or to access certain cookies. We may use these graphics on our websites to count users and to recognize users by accessing our cookies. Being able to access our cookies allows us to personalize our website and improve your experience at our website. We may also include these graphics in HTML-formatted e-mail messages that we send to determine which e-mail messages were opened.

Cookies and similar technologies used for online behavioral advertising – and your right to opt out

Third parties that are involved in serving other companies' advertising on our websites, or that are involved in determining which advertisements you might see on third-party websites, may use cookies to collect information (such as the advertisements you have seen or the websites or pages you have visited) in order to draw inferences about what internet advertising content might be relevant to you. These cookies may be used by these third parties while you are visiting our website, and these third parties may then use the information gathered through these cookies to show you advertising they believe to be most relevant to you when you visit other websites not belonging to us. This practice is called "online behavioral advertising." You have the ability to opt out of allowing these third parties to use cookies to gather information from your computer for online behavioral advertising by clicking here.

If you opt out, these companies have committed to refrain from using cookies (or similar technologies) in this manner to gather information on any website (not just ours) for online

behavioral advertising purposes. Please be aware that the opt-out process is itself cookie-based. In other words, when you opt out, a cookie is placed on your browser that informs these third parties that they are not to use cookies with you for online behavioral advertising. As a result, if you subsequently clear cookies from your browser (as many people do periodically), your opt out will be lost until you reinstate it. Also, please be aware that your opt out does not mean you will not continue to receive advertising – you just will not receive advertising that might otherwise have been targeted to you based on these cookies on your computer.

When we might provide other parties with your personal information If you give us your explicit consent to do so, we may share your personal information with other marketers at unaffiliated companies. If you do not affirmatively consent to this, we will not share your information with such other marketers.

We may provide your personal information to third parties who provide services on our behalf. These parties may use the information solely in conjunction with the specific services they provide for us (e.g., fulfillment of an order, responding to your question or comment, providing a sweepstakes prize, deployment of a consumer survey, investigation of a complaint, etc.).

Some of these third parties may be involved in administering or supplementing our databases and will need to have access to the information in order to do so. For example, we may retain a third party to verify the accuracy of information within our databases or to gather additional information about individuals within our databases from commercially available sources.

We reserve the right to transfer any information we have about you in the event that we sell or transfer all or a portion of our business or assets to a third party. We also reserve the right to share information within General Mills amongst our various businesses.

We reserve the right to disclose any personal information as needed if such information is requested by law enforcement agencies or if we are required to do so by law, regulation, subpoena, court order, or by a government entity. We also may disclose personal information to third parties if we have reason to believe that disclosing such information is necessary to conduct investigations of possible breaches of law or legal rights, to cooperate in any legal investigation,

or to identify, contact, or bring legal action against someone who may be violating the terms of use of our website or any other terms applicable to any activity or feature of our website.

Personal information we may receive from third-party social-networking services If you choose to access or make use of third-party social-networking services (such as Facebook or Twitter), we may receive personal information about you that you have made available to those services, including information about your contacts on those services. For example, some social-networking services allow you to push content from our website to your contacts or to pull information about your contacts so you can connect with them on our website. Some social-networking services also will facilitate your registration for our website or enhance or personalize your experience on our website. Your decision to use a social-networking service will always be voluntary. However, you should make sure you are comfortable with the information your third-party social-networking services may make available to our website by visiting those services' privacy policies. Any personal information we receive through third-party social-networking services may be used as described above.

Security for credit card data and transaction information At General Mills, we are committed to keeping your online transactions safe and secure. In order to reasonably assure the privacy and security of your credit card and other personal data when making an order, we use Secure Sockets Layer (SSL) technology. SSL uses encryption technology to create a secure connection between your computer and ours. We have also put procedures in place to safeguard the information/data we collect from you. We cannot absolutely guarantee the security of any information you provide online; you provide it at your own risk.

Links to other sites Our website may contain links to the websites of our subsidiaries and affiliates, and to websites that are owned and operated by third parties. These other websites may have their own privacy policies and are not be governed by this Privacy Policy. We are not responsible for the privacy practices or the content of websites owned and operated by any such third parties. Other websites may collect and treat information collected differently, so we encourage you to carefully read and review the privacy policy for each website you visit.

User-generated content and public profile features This website may, from time to time, contain interactive areas where website users might submit comments or other content (including information about the user that might be displayed in the user's public profile within an online community) that may be posted on the website or otherwise published. Users who do this should be aware that when they voluntarily disclose personally identifiable information (e.g., name, e-mail address, etc.) in content submitted for posting or publication, the information can be read and used by others. This may result in unsolicited messages from other posters or parties. We make no representations and undertake no obligations as to the security or use of information you voluntarily include when submitting content.

Send-to-a-friend tools This website may, from time to time, include a send-to-a-friend application that makes it easy for you to forward information or materials from our website to friends or family by e-mail. In order to address your e-mail message, the application may ask you to input the recipient's e-mail address and/or similar information (including your e-mail address). This information is only used by the application to address your message so that it can be properly sent. General Mills does not retain any of this information for any purpose.

Children's privacy This website is not directed to children and we will not request any information from children under 13 at this website. General Mills does have other websites that are geared in whole or in part to a child audience. Our commitment to the privacy of children is described more fully in the privacy policies of those websites. General Mills and its affiliated companies take special care to protect the privacy of children under the age of 13. We have developed our privacy practices as they relate to children from guidelines established by the Children's Advertising Review Unit (CARU) and in compliance with the requirements established by the Children's Online Privacy Protection Act of 1998 ("COPPA"). We also recommend that parents monitor their children's Internet activities and learn and employ software or other tools which can help their children enjoy the fun and entertainment of an on-line experience without compromising their personal safety or allowing them to use the Internet in a manner inconsistent with their parents' preferences.

United States only This website is intended for use by residents of the United States of

America only. All matters relating to this website are governed by the laws of the United States. If you are located outside of the United States and you contact us, please be advised that any information you provide to us will be transferred to the United States and that by submitting information you explicitly authorize this transfer and the processing of this information within the United States.

Changes in our online privacy policy We reserve the right to change or replace this Privacy Policy at our sole discretion at any time. Please check back from time to time to ensure that you are aware of any updates or changes in this Privacy Policy. Unless stated otherwise, our current Privacy Policy applies to all information gathered via this website.

Your consent to the terms of this privacy policy By using this website, you signify your assent to all of the terms of this Privacy Policy and this website's Terms of Use. If you do not agree with any term of this Privacy Policy or our Terms of Use, please do not use this website or submit any personally identifiable information.

Your control over your information You always have the right to review and update the information that you previously provided to us at this website. You may contact us as described immediately below in order to arrange this or to ask us to remove you from our list of email addresses to which we send email newsletters. All of our email newsletters also contain an "unsubscribe" link that you can click through to unsubscribe from future emails.

How to contact us

If you have any questions or concerns about this Privacy Policy or about our collection or use of information, please Contact Us. You may also reach us by telephone at 1-800-248-7310 weekdays from 7:30 a.m. – 5:30 p.m. Central Time.


Reese's Puffs
Nutrition Facts
Serving Size ¾ cup (29g)
Servings Per Container about 17
Amount Per Serving | Reese's Puffs | with ½ cup skim milk
Calories 120 160
Calories from Fat 30 30
% Daily Value**
Total Fat 3g* 5% 5%
Saturated Fat 0.5g 3% 3%
Trans Fat 0g
Polyunsaturated Fat 1g
Monounsaturated Fat 1.5g
Cholesterol 0mg 0% 1%
Sodium 160mg 7% 9%
Potassium 65mg 2% 7%
Total Carbohydrate 22g 7% 9%
Dietary Fiber 1g 5% 5%
Sugars 10g
Other Carbohydrate 11g
Protein 2g
Vitamin A 10% 15%
Vitamin C 10% 10%
Calcium 10% 25%
Iron 25% 25%
Vitamin D 10% 25%
Thiamin 25% 30%
Riboflavin 25% 35%
Niacin 25% 25%
Vitamin B6 25% 25%
Folic Acid 25% 25%
Vitamin B12 25% 35%
Phosphorus 6% 20%
Magnesium 4% 8%
Zinc 25% 30%
* Amount in cereal. A serving of cereal plus skim milk provides 3g total fat, 5mg cholesterol, 220mg sodium, 270mg potassium, 26g total carbohydrate (16g sugars), and 6g protein.
** Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:
Calories 2,000 2,500
Total Fat Less than 65g 80g
Sat Fat Less than 20g 25g
Cholesterol Less than 300mg 300mg
Sodium Less than 2,400mg 2,400mg
Potassium 3,500mg 3,500mg
Total Carbohydrate 300g 375g
Dietary Fiber 25g 30g
Ingredients: Whole Grain Corn, Sugar, Reese's® Peanut Butter (peanuts, sugar, monoglycerides, peanut oil, salt, molasses, corn starch), Dextrose, Corn Starch, Corn Syrup, Rice Bran and/or Canola Oil, Corn Meal, Salt, Hershey's® Cocoa, Red 40, Yellows 5&6, Blue 1 and Other Color Added, Trisodium Phosphate, Natural and Artificial Flavor. BHT Added to Preserve Freshness.
Vitamins and Minerals: Tricalcium Phosphate, Calcium Carbonate, Zinc and Iron (mineral nutrients), Vitamin C (sodium ascorbate), A B Vitamin (niacinamide), Vitamin B6 (pyridoxine hydrochloride), Vitamin B2 (riboflavin), Vitamin B1 (thiamin mononitrate), Vitamin A (palmitate), A B Vitamin (folic acid), Vitamin B12, Vitamin D3.
CONTAINS PEANUT; MAY CONTAIN WHEAT INGREDIENTS.
DISTRIBUTED BY GENERAL MILLS SALES, INC., MINNEAPOLIS, MN 55440 USA
If you are not satisfied with the quality of this product, a prompt refund or adjustment of equal value will be made. Your comments and questions are welcome. Save or send your box top and
CALL: 1-800-328-1144 (7:30 AM-5:30 PM CT, Weekdays)
WRITE: General Mills, Box 200, Mpls., MN 55440
www.GeneralMills.com
© 2011 General Mills
May be mfg. under U.S. Pat. Nos. 6,152,021; 6,167,798; 6,189,439; 6,767,198 & 7,021,525
Exchange: 1½ Starch
Exchange calculations based on Choose Your Foods: Exchange Lists for Diabetes 2008 the American Dietetic Association, the American Diabetes Association.
This package is sold by weight, not by volume. You can be assured of proper weight although some settling of contents normally occurs during shipment and handling.
36500885581 SSG 3644855561
use your online code to unlock amazing stuff!
7A21MC
YOUR ONLINE CODE
Create your own rap & dancing avatar! @reesespuffs.com
Reese's Puffs
DJ NAME MIXER
TWO WAYS TO CREATE YOUR OWN DJ NAME:
1. Take the street you grew up on and the name of your first pet, then change all the "i"s" to "y"s"!
2. Take the name of your favorite movie or Superhero villain, then add the first letter of your middle name!
MIXMASTER
NOW THAT YOU HAVE YOUR DJ NAME, YOU'RE READY TO CREATE YOUR OWN REESE'S® PUFFS® RAP! Fill in each space below with a word from the corresponding channel. When all the spaces are filled, you're ready to freestyle your own REESE'S Puffs rap! Replay as much as you want, using different words. See how many raps you can create!
MY REESE'S® PUFFS® RAP
THAT PEANUT BUTTER CHOCOLATE ___1___
IS THE ___3___ THAT I ___2___ THAT ___1___
REESE'S PUFFS, REESE'S PUFFS, IN YOUR BOWL, IN YOUR BOWL!
RECOGNIZE THE TASTE THAT I ___2___
REESE'S PUFFS REESE'S PUFFS,
WOW PEANUT BUTTER CHOCOLATE ___2___
SO CRUCIAL TO MY ___4___ VERNACULAR
THAT PEANUT BUTTER ___3___ IS OH SO SPECTACULAR!
REESE'S PUFFS, REESE'S PUFFS!
MY REESE'S PUFFS ARE ___5___
EACH PEANUT BUTTER ORB IS ___5___ !
REESE'S PUFFS, REESE'S PUFFS, IN YOUR BOWL, IN YOUR BOWL!
1 CHANNEL
I MUST CONFESS
I MUST POSSESS
I WILL OBSESS
I WILL ADDRESS
2 CHANNEL
FLAVOR SAVOR
CRAVER RAVER
3 CHANNEL
DUO TASTE FLAVOR MIX COMBO HOOKUP
4 CHANNEL
EATING CRUNCHING BREAKFAST CEREAL
CHOMPING
5 CHANNEL
A MIRACLE L- L- LYRICAL OH SO SPHERICAL
TOTALLY RADICAL
REESESPUFFS.COM