

# RILA PRIVACY PRINCIPLES

## *Exhibit A*

Measures We Support for Consumers	Details
<p><b>Scope:</b> We support privacy principles in all channels, including online and offline.</p>	<p>Our support depends on businesses retaining flexibility. Flexibility is crucial because of what is (1) <b>practicable</b> given the time, place, medium, technology, and transaction, and (2) <b>proportional</b> to the sensitivity of the data, potential harms, administrative burden, and consumer benefit.</p>
<p><b>Open Communication:</b> We support an open communication approach to augment the traditional static notice regime. This approach may incorporate:</p> <ul style="list-style-type: none"> <li>• Prior notice,</li> <li>• Information that's available on request, or</li> <li>• Layered or full notice.</li> </ul>	<p>Open communication depends on what is <b>practicable</b>, for the time, place, medium, technology, and transaction. Open communication should be <b>proportional</b> to the sensitivity of the data, potential harms, administrative burden, and consumer benefit. We may factor in the consumer's common sense and needs in designing communications (e.g., through signs, symbols, and messages).</p>
<p><b>Choice:</b> We support empowering consumers with choice over:</p> <ul style="list-style-type: none"> <li>• Direct marketing, including online behavioral advertising,</li> <li>• Disclosure of personal information to unaffiliated third parties for their marketing purposes,</li> <li>• Retroactive application of material changes to privacy policies, and</li> <li>• Geo-location marketing through mobile technology.</li> </ul>	<p>As a general rule, we support choice through an opt-out option. We support an opt-in option only as warranted by a business's privacy design and for geo-location mobile marketing.</p> <p>We support the FTC's position as enumerated in its 2009 report regarding online behavioral advertising, specifically, applying choice principles when data is shared with third parties or across multiple web sites, but not to first party and contextual advertising.</p> <p>We must have the flexibility to design choice mechanisms (e.g., when and how) based on practicability, proportionality, and consumer experience.</p>
<p><b>Access and Correction:</b> We support allowing consumers to access personal information about them to the extent it is systematically maintained, readily available, and searchable. Examples include account information, billing information, shipping information, and recent purchase history.</p> <p>Otherwise, we support allowing access through disclosure of the types of information typically collected. We support allowing consumers to correct data about them, or providing the reasons why correction cannot occur.</p>	<p>Practicability and proportionality govern this principle. Factors that weigh on how or whether to provide access or correction include authentication needs, administrative burden, data accuracy and integrity, and possible restrictions related to contractual limitations, internal or external investigations, asset protection, and protection of proprietary data.</p>
<p><b>Responsible Information Management:</b> We support designing responsible information management through the use of proportional safeguards (e.g., data security, data integrity, and retention periods).</p>	<p>Proportional safeguards should be risk-based and include appropriate administrative, technical and physical safeguards. We believe that one-size-fits-all requirements, such as prescriptive retention periods: (1) do not address emerging risks, (2) are not tailored to address real risk, and (3) discourage innovation in information management.</p>
<p><b>Accountability:</b> We support designing programs that promote these principles. In particular, we will provide meaningful responses to consumer questions about the ways in which we implement these principles.</p>	<p>Each business should review its operations and programs to promote these principles. We have concerns about requiring companies to hire third party reviewers for accountability. They add little incremental value for the consumer.</p>

