



$\star \star \star \star \star$

Consumers who rely on online reviews of companies, products, and services should be getting a true and accurate picture of what other consumers think. If you operate a website or platform that features reviews, have processes in place to ensure those reviews truly reflect the feedback received from legitimate customers about their real experiences.

Different types of companies are involved in collecting, moderating, and publishing reviews, so the same processes won't necessarily make sense for all of them. For example, an online retailer may feature user reviews for its own products and for products other companies sell on its website. Other websites are platforms for consumers to leave reviews of hotels, restaurants, or other service providers. User reviews also appear in search engine results, in app stores, and on social media pages, among other places.

FTC staff believes that, whatever your business model may be, you should be transparent about your review-related practices and should pay attention to several basic principles that derive from Section 5 of the FTC Act. Doing so is important for establishing consumer trust and avoiding potentially deceptive conduct.





Review collection



3

Online retailers, review platforms, and other companies collect reviews from consumers in different ways. Some use "open" systems that allow all consumers to submit reviews, while others use "closed" systems that limit collection to verified buyers or users. Neither system is immune to fake reviews, though operators of "open" systems may face more challenges in determining whether reviews are legitimate. Some companies are proactive in seeking more reviews, using repeated requests and sometimes offering incentives to consumers. As reflected in cases brought by the FTC and other law enforcement agencies, some of these companies go too far, offering incentives only for positive reviews, or taking improper steps to avoid collecting negative reviews.

Here are some basic principles that FTC staff believes companies should follow:

- 1. Don't ask for reviews only from people you think will leave positive ones.
- If you offer an incentive to consumers for leaving a review, don't condition it, explicitly or implicitly, on the review being positive. Even without that condition, offering an incentive to write a review may introduce bias or change the weight and credibility that readers give that review. For these reasons, some platforms have prohibited incentivized reviews altogether or have established mechanisms for labeling them.
- 3. Don't prevent or discourage people from submitting negative reviews.

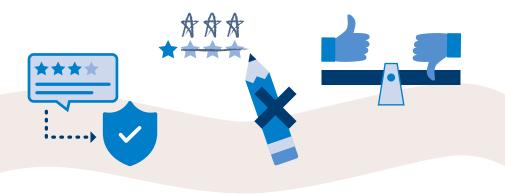
Review moderation



How a company processes or "moderates" reviews is another element that varies depending on a number of factors – for example, the company's business model, size, and resources. Many companies use both automated systems and human moderators to filter out fake reviews or content that violates company policies (such as prohibitions on obscenity and harassment). Companies may moderate reviews before they're posted, after they're posted, or at different times throughout the process.

FTC staff believes that, despite the wide variety of processing techniques, a few basic principles apply:

- Have reasonable processes in place to verify that reviews are genuine and not fake, deceptive, or otherwise manipulated. As technology and threats change, be proactive in modifying and upgrading your processes.
- 2. Don't edit reviews to alter the message. For example, don't change words to make a negative review sound more positive.
- 3. Treat positive and negative reviews equally. Don't subject negative reviews to greater scrutiny.



Review publication



5

Companies that feature online reviews make choices about what feedback to display and what to tell consumers about that feedback. For example, some online retailers and review platforms allow only narrative reviews, or only narrative reviews of a certain minimum length. Others allow reviews that consist only of a star rating. Some provide information about each reviewer and how overall ratings are calculated. Others are much less transparent. And companies that allow publication of incentivized reviews vary on whether and how those reviews are identified.

FTC staff believe that companies should favor transparency and follow these principles:

- 1. Publish all genuine reviews and don't exclude negative ones.
- 2. Don't display reviews in a misleading way. For example, it could be deceptive to feature the positive ones more prominently.
- If you display reviews when the reviewer has a material connection to the company offering the product or service – for example, when the reviewer has received compensation or a free product in exchange for their review – that relationship should be clearly and conspicuously disclosed.



Review publication (continued)



- 4. Clearly and conspicuously disclose how you collect, process, and display reviews, and how you determine overall ratings, to the extent necessary to avoid misleading consumers.
- 5. Have reasonable procedures to identify fake or suspicious reviews after publication. If a consumer or business tells you a review may be fake, investigate and take appropriate action. That may include taking down suspicious or phony reviews, leaving them up with appropriate labels, issuing an alert about them, and addressing the issue with those responsible for it.











business.ftc.gov