COMPLIANCE WEEK WEST

NOV 14-15 2013 ROSEWOOD SAND HILL MENLO PARK CA

THE INTERSECTION OF ETHICS, COMPLIANCE, PRIVACY & BIG DATA

#CWWEST13

Policy Management for Social Media & More

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Social Media is the #1 source of information about food

49% use social media to learn about food

32% use social tools while eating

47% of millenials txt while eating

Clicks & Cravings: The Impact of Social Technology on Food Culture - The Hartman Group, 2/2012

Social Media Allows Us To…

- Remain relevant to our customers
- Influence/participate in conversation
- Build awareness
- Drive trial
- Engage with customers
- Amplify other media
- Connect with communities

Digital Footprint

Country Websites

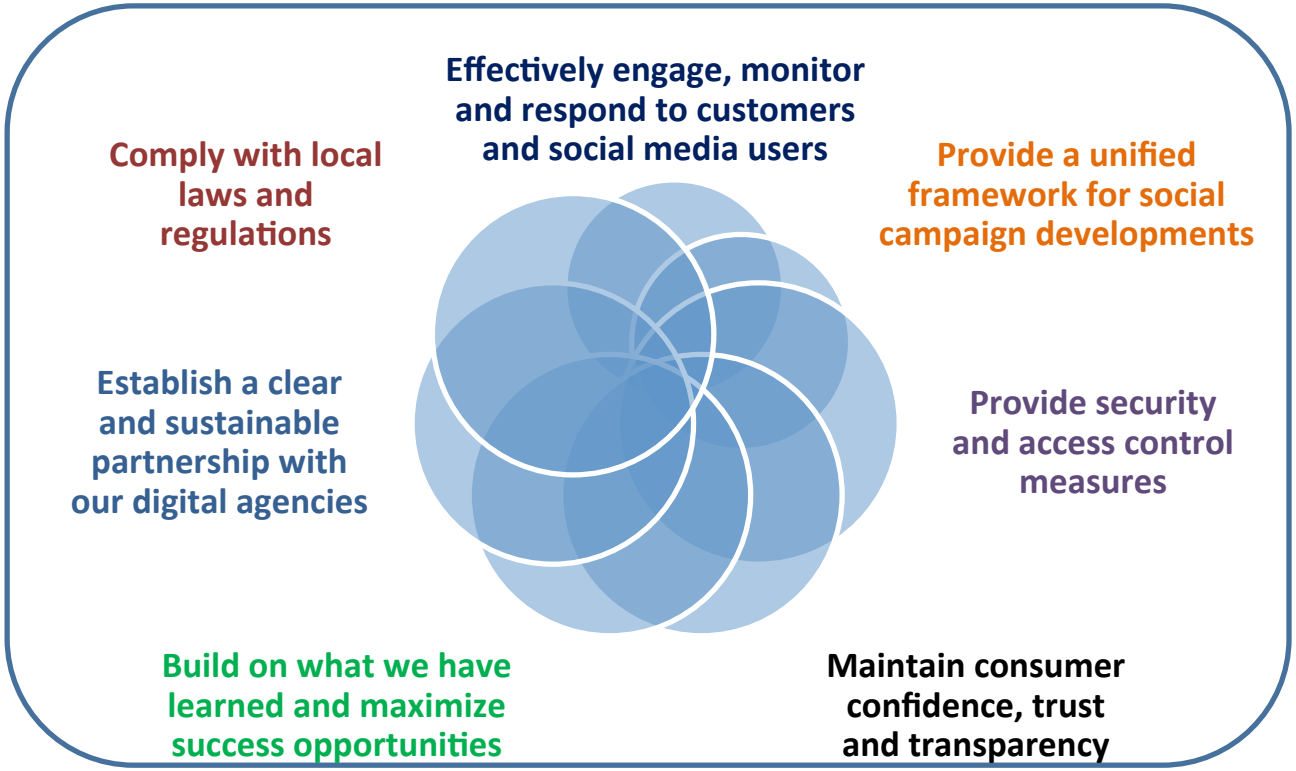
85+

Country Social Media Channels

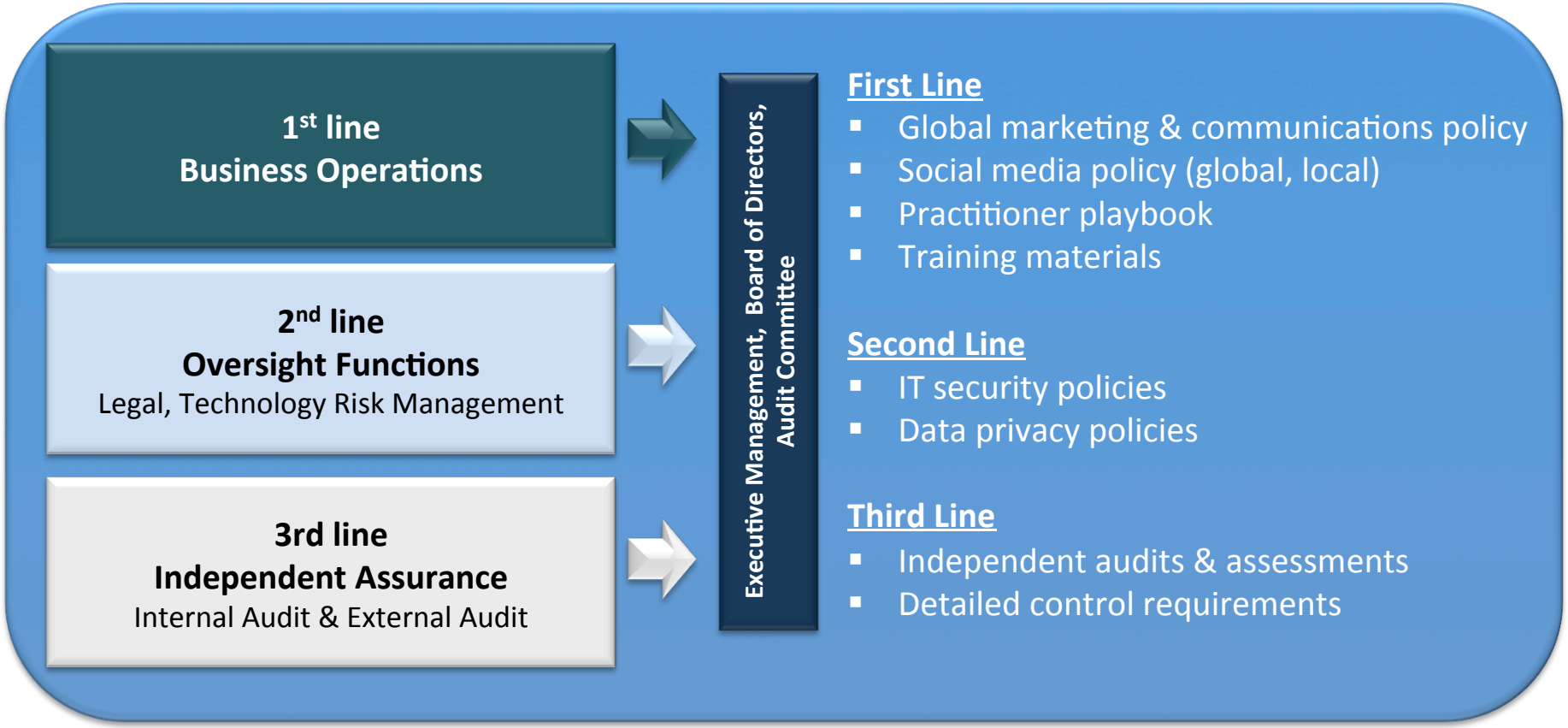
80+ 40+ 40+

Why Policies & Guidelines?

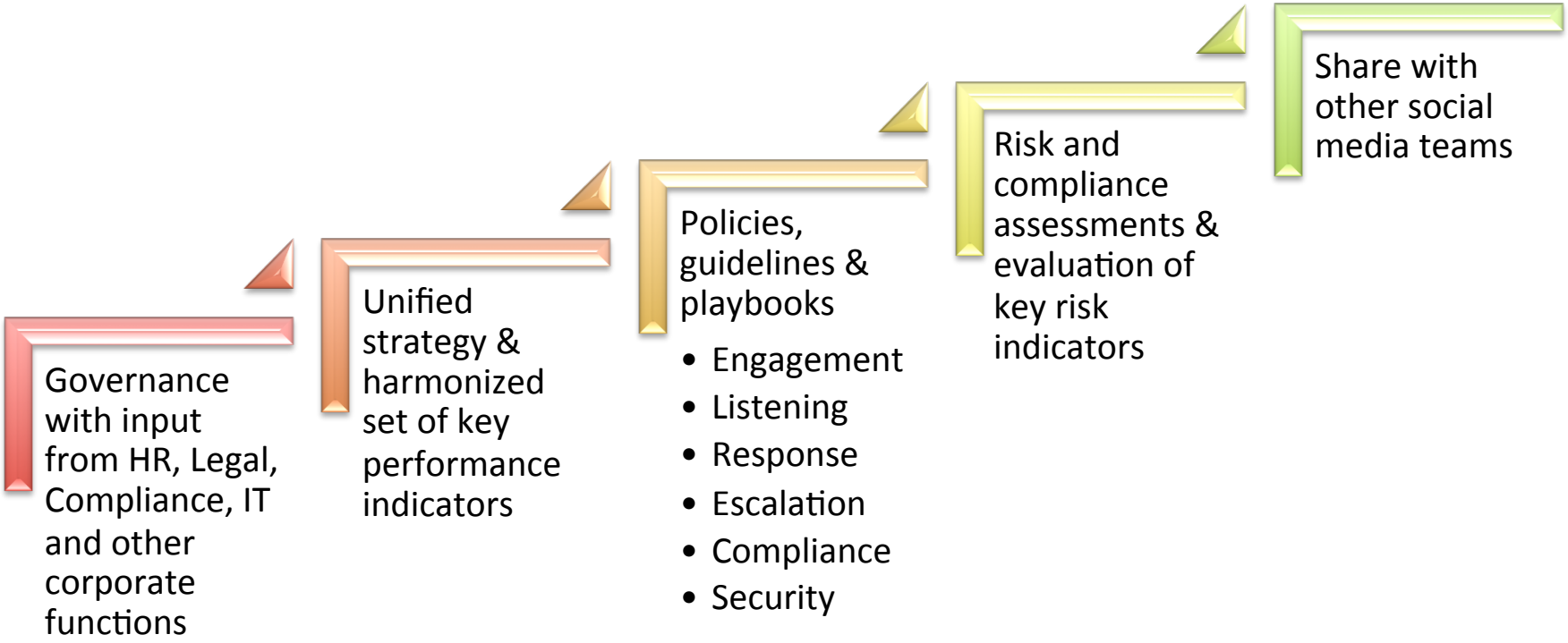
Social media is a part of our daily life and has become a strong communication vehicle and a very powerful and growing marketing medium



Three Lines of Defense



Evolution of Social Media Governance



Key Policies & Guidelines

	Business Insights	Marketing / Communications	IT / Digital	Legal / Compliance
Governance	▪ Brand ambition ▪ Reputation ▪ Business objectives ▪ Consumer habits ▪ Digital environment ▪ Reporting tools	▪ Brand ambition ▪ Reputation ▪ KPIs / metrics: exposure, engagement, strategic, financial ▪ Training & education ▪ Portability & localization ▪ HR considerations	▪ IT security ▪ Cloud security	▪ Agency contracts ▪ Content ownership ▪ Local laws & regulations ▪ Moderation ▪ Reputation ▪ Corporate ethics
Strategic Listening	▪ Sentiment analysis ▪ Real-time measurement ▪ Data collection & retention	▪ Listening protocol ▪ Response guidelines ▪ Escalation procedures ▪ Data collection & retention	▪ Vendor selection ▪ Monitoring platforms ▪ Data collection & retention	▪ Terms & conditions ▪ Games ▪ e-privacy ▪ Cookies ▪ Data collection & retention ▪ Opt-in/out ▪ Children
Technology	▪ User access	▪ User access	▪ User access ▪ Change control ▪ Hosting ▪ Testing ▪ Vulnerability ▪ System performance	▪ Technology vendor contracts

Introducing Key Risk Indicators

- Active channels without executive and legal sign-off of terms & conditions
- Channels without company representation
- Abandoned channels without indication of decommissioning activities
- Unauthorized and distractor accounts
- Inappropriate posts and velocity of responses and followers
- Duration of time between posting and company response
- Employees without social media training or knowledge of policies
- Accounts used by non-trained employees
- Employees using personal devices
- Employee engagement and response does not follow policy or guidelines
- Accounts without approved disclaimer language
- Detailed job descriptions and HR guidelines

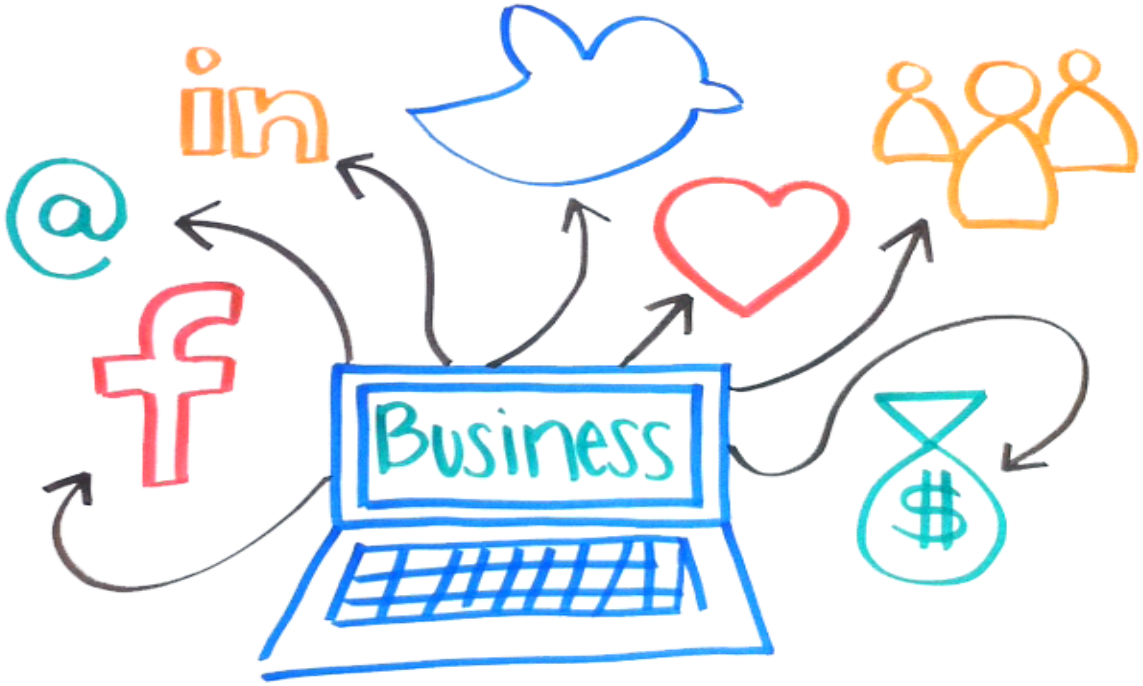
Emerging risks evaluated by Audit

Jeremy Feigelson

Partner

Debevoise & Plimpton

Employee Use of Social Media



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Hypothetical

- Acme Bakery and Beauty Corp.
- Hot new product: “Frost Your Face”
- Volumizing lip gloss + zero-calorie cupcake frosting in one convenient tube!

Risks

- False advertising
- Infringement of IP, rights of publicity/privacy
- Disclosure of confidential information
- Promotion laws
- Defamation
- Special rules: regulated & public companies

Risks

Acme's Digital Marketing Intern: Mr. Spicoli

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Acme Sends FYF Sample to Blogger Miley

- Miley blogs, tweets: "Love #FrostYourFace! Lips 3x plumper, no more collagen shots for me. Plus lost 5 lbs this week on cupcake diet! 'Green' packaging too."
- Noted pop singer Dame DaDa retweets Miley's comment
- Back at Acme, Intern Spicoli:
  - posts Miley's comment on frostyourface.com, Facebook page, Twitter feed
  - posts photo of Dame DaDa w/caption: "We love Dame DaDa & she loves us! Buy FYF @ amazon.com"

Don't Be Too Afraid

- Promote clear, plain-English social media policy
  - Who can use social media, who supervises
  - What they can say and do
  - Where they can say and do it
- Make policy work in practice
  - Train employees and bloggers
  - Monitor their activities
  - Lather, rinse, repeat