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# Beyond Your Privacy Policy: Developing a Comprehensive Privacy Plan

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# Your Policy Should Cover:

Everything you do with personal information and what choices customers have

Helps to have External and Internal policies the same

Plan for the **future**

# Policy is great, now what ?

Everything else you do or say can become “policy”

Everywhere you deal with personal information needs to be part of a plan

Follow the data

# Following the Data

Advertising

Communicating to Non-Customers

Sign Up/Purchase

Using the Product or Service

Communicating to Customers

Customer Interaction

Ending the Relationship

Everything about Privacy  
should be:

Easy  
Obvious  
Consistent

# Website

Collect information?

What do you say about it at the time of collection? (Obvious)

Choices? (Easy)

What actually happens?

Consistent with privacy policy?

3<sup>rd</sup> Party Links? (Obvious)

# Marketing

Are there claims about information use? Should there be?

Clear what information is required?

Contests?



# Email to customers

Big issue because of different internal groups and uses

Effective Opt-out? (Easy)

Surveys

Categorize information = easy and obvious

# Registration

Account for every piece of information  
coming in

Storage

Paper records = destruction

# Customer Service

Real time interaction with a customer  
Need good rules for what and how  
information is collected and used  
Ask for MMN? password? (Consistent)  
Warnings to customers?  
Phishing?

# Public Relations

PR and Managers need to understand  
the intricacies of your policy

CEO speeches – be careful

Blogs

# Plan for a mess

What happens during a crises?  
Are privacy rules still followed?  
Are they “bent” in the name of  
urgency?  
Practice scenarios over and over  
(Consistent)



# Questions?

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