Guidelines for the Collection and Tracking of Information from Children on the GII and in Interactive Media Submitted to the Federal Trade Commission 1996-7

In June 1996, the Center for Media Education (CME) and Consumer Federation of America (CFA) requested that the Federal Trade Commission (FTC) issue guidelines for permissible industry practices regarding the collection and tracking of information from children on the Global Information Infrastructure and in Interactive Media. The guidelines are founded on two basic principles:

• Personally-identifiable information may be collected and/or tracked from children for commercial marketing purposes only if the collection and tracking practices are not deceptive; are fully and effectively disclosed; and valid parental consent is obtained.

• Aggregate and anonymous information may be collected and/or tracked from children for commercial marketing purposes only where the collection and tracking practices are not deceptive and are fully and effectively disclosed.

All information collectors(trackers) must comply with four requirements:

1) Disclosure must be full and effective. The disclosure notice must include:

• what information is being collected or tracked;
• how the information is being collected or tracked;
• how the information will be used;
• who is collecting the information; and
• who will have access to the information.

2) Parental consent must be obtained. In order for the consent to be valid:

• the child must understand that s/he needs to get parent permission before proceeding and the parent must receive complete disclosure;
• access to those areas of the site where information is collected or tracked must be conditioned on receipt of valid parental consent; and
• the burden is on the collector/tracker to obtain valid parental consent through writing or other electronic mechanisms.

3) Parents must be able to correct information already collected about and from their children.

4) Parents must be able to prevent the further use of their children's information after it has been collected.