

**The Direct Marketing Association  
Ethics & Consumer Affairs Department**

**Submission for Interagency Public Workshop:  
Get Noticed: Effective Financial Privacy Notices  
December 4, 2001**

The Direct Marketing Association (DMA) Ethics & Consumer Affairs Department's mission is to advise and educate members on good business practices. We provide plain language guidelines, FAQs, online tools and resources to assist marketers in complying with DMA guidelines and laws affecting direct marketers. The DMA Ethics & Consumer Affairs Department strives to build and strengthen business-customer relationships by assisting companies in employing good business policies and practices.

The DMA is pleased to announce its latest online tool to assist marketers in complying with the notice and opt-out requirements of the Gramm-Leach-Bliley Act of 2000 (GLB). The DMA has developed a "wizard" to walk companies through the process of creating a privacy policy that meets the spirit and the letter of The GLB Act.

DMA members and others interested in using our "wizard" will soon be able to fill-out the questions below online on our Web site at [www.the-dma.org](http://www.the-dma.org). After the company completes the GLB "wizard," a customized policy is immediately and automatically generated for the company to post on its Web site and mail to its customers.

**DMA PRIVACY POLICY GENERATOR**  
*To Comply with the Gramm-Leach-Bliley (GLB) Act of 2000*

**1. HOW WE PROTECT CUSTOMER INFORMATION**

*(Please select your opening company statement.)*

- At *(company name)*, one of our top priorities is making sure that the information we have about you is protected and secure. We value our relationship with you and work hard to preserve your privacy and ensure that your preferences are honored. At the same time, the very nature of our relationship may result in us collecting or sharing certain types of information about you. We explain how we use customer information in this privacy policy statement. We invite you to state your choices in the *Customer Preferences* section. We will honor your selection.
- You have a right to know how information about you is used and protected. Most data remains within the corporate family, and is used to do business with you. Some is shared with others to process your account or for marketing. We explain how we use information in this privacy policy statement. We invite you to state your choices in the *Customer Preferences* section. We will honor your selection.
- Other *(enter your own company statement)* \_\_\_\_\_

**2. INFORMATION WE COLLECT**

We collect information:

*(Please check all that apply.)*

- you give to us on applications, surveys, registration forms, etc.;
- you give to us when you make a purchase, or other account information such as balance, payment history or credit card usage;
- you or others give to us about your credit history;
- others give to us to make sure that the data you provide is accurate and up-to-date. This may include information about you from employers, banks, or insurers.
- other *(please specify)* \_\_\_\_\_

**3. HOW WE SHARE INFORMATION**

*(Please check all that apply.)*

- a.  We **do not** share information that we have about you with anyone except in response to subpoenas or for other legal reasons.  
***(If you checked “a,” proceed to question 4.)***
- b.  We share information with our affiliates (members of our corporate family) or companies outside our corporate family that perform services on our behalf. We share information to process transactions, respond to your inquiries, or provide information about the products or services that we offer.

We share

*(Please check all that apply.)*

- data provided by customers
  - purchase/account data
  - credit history data
  - verifying data
  - other *(please specify)* \_\_\_\_\_
- c.  We share information with companies that we have a special relationship with such as joint marketers.

We share

*(Please check all that apply.)*

- data provided by customers
- purchase/account data
- credit history data
- verifying data
- other *(please specify)* \_\_\_\_\_

- d.  We share information with non-affiliates (companies outside our organization) that would like to offer you their products or services that might be of interest to you.

We share

- data provided by customers  
 purchase/account data  
 credit history data  
 verifying data  
 other (please specify) \_\_\_\_\_

***(If you checked nothing under “d,” you may check “e.”)***

- e.  We **do not** share information about you with non-affiliates (companies outside our organization) for them to contact you for their own marketing purposes.

- f. The types of companies that we share information include

- financial service providers such as  
 mortgage bankers  
 securities brokers-dealers  
 insurance agents  
 other financial service providers (please specify) \_\_\_\_\_

- In addition, we share information with non-financial companies such as

- retailers  
 magazine publishers  
 direct marketers  
 non-profit organizations  
 other (please specify) \_\_\_\_\_

- g. **The law permits us to share information about our current and former customers with government agencies or authorized third parties under certain circumstances. For example, we may be required to share such information in response to subpoenas or to comply with certain laws. (\*This statement will automatically be added to your policy notice.)**

4. **HOW WE PROTECT INFORMATION**

- We strive to protect your data and safeguard it from those not authorized to see it.  
 Other (please specify) \_\_\_\_\_

**5. FORMER CUSTOMERS**

- a.  We **do not** share information about our former customers with anyone except in response to subpoenas or for other legal reasons.  
*(If you checked "a," proceed to question 6.)*
- b.  We share information about our former customers with members of our corporate family or companies outside our corporate family that perform services on our behalf.

We share

*(Please check all that apply.)*

- data provided by customers  
 purchase/account data  
 credit history data  
 verifying data  
 other *(please specify)* \_\_\_\_\_

- c.  We share information about our former customers with companies that we have a special relationship with such as joint marketers.

We share

- data provided by customers  
 purchase/account data  
 credit history data  
 verifying data  
 other *(please specify)* \_\_\_\_\_

- d.  We share information about our former customers with companies outside our organization that would like to offer you their products or services that might be of interest to you.

We share

- data provided by customers  
 purchase/account data  
 credit history data  
 verifying data  
 other *(please specify)* \_\_\_\_\_

*(If you checked nothing under "d," you may check "e.")*

- e.  We do not share information about our former customers with companies outside our organization for them to contact you for their own marketing purposes.

**6. CUSTOMER PREFERENCES**

*(Company can skip this section if it does not share customer information with companies outside its organization nor credit history information with members of its corporate family.)*

**We honor your choices for sharing data as checked below. Please fill-out this form and return it to us at:**

*(Company Name)* \_\_\_\_\_

*(Address)* \_\_\_\_\_

*(City)* \_\_\_\_\_ *(State)* \_\_\_\_\_ *(Zip)* \_\_\_\_\_

*(Company must provide customers with the appropriate options as listed below:)*

Please do not share information about me with companies outside your organization. *By law, this doesn't include companies that are performing services on our behalf or our financial marketing partners.*

Please do not share my credit history with members of your corporate family.

**For joint accounts:**

*(Company must select "a" or "b" if it has joint account holders.)*

a. We will honor your preferences, and will automatically apply those same choices to the other account holder(s).

b. We will honor each account holder's preferences separately.

Please apply my preferences to all joint account holders.

Please accept my preferences and honor the other account holder(s) as follows: Joint account holder name(s): \_\_\_\_\_

Do not share information about the joint account holder listed above outside your company.

Do not share credit history data about the joint account holder listed above with members of your corporate family.

**Name:** \_\_\_\_\_

**Address:** \_\_\_\_\_

**City:** \_\_\_\_\_ **State:** \_\_\_\_\_ **Zip:** \_\_\_\_\_

**Account/Policy No(s):** \_\_\_\_\_

*(Other options company may provide):*

In addition, you may share with us your preferences by calling us toll-free at: \_\_\_\_\_ *(company toll-free number)*

or by e-mailing us at: \_\_\_\_\_ *(company e-mail address)*