



- 3) Include in the disclosure a statement of adherence to the DAA Principles; and
- 4) Provide a clear, meaningful, and prominent link on every page of its site where IBA occurs that takes users to this IBA disclosure.

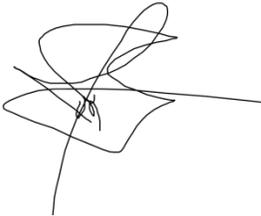
Penske Media Corporation (PMC) came to our attention because of a consumer's report that the company did not provide enhanced notice on its Variety.com domain despite allowing third parties to collect data for IBA on the site. An Accountability Program review appeared to confirm the consumer's observations and led to the opening of a formal inquiry.

However, the inquiry revealed that PMC had independently initiated its own compliance review and made substantial progress to remediate the compliance issues prior to receiving our communication. PMC further demonstrated its commitment to compliance with the DAA Principles and respect for consumer privacy by accelerating the implementation of changes that addressed the Accountability Program's recommendations. As a result of PMC's anticipatory actions and thorough follow-through, we have exercised our discretion to close the case by means of an Administrative Disposition rather than a decision.<sup>2</sup>

We commend PMC for taking the initiative to review its own privacy compliance status, seamlessly incorporating the Accountability Program's recommendations into its new privacy plan, and seeing that the relevant changes were made with all due haste. We encourage other website publishers to follow this example.

## **DISPOSITION**

Recommendations implemented. Case closed.



**Jon M. Brescia**  
**Director, Adjudications and Technology**  
**Online Interest-Based Advertising Accountability Program**

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<sup>2</sup> *In re: Volkswagen (29-2013)*, Nov. 18, 2013 at 1 (“In cases where a company independently initiates and has made substantial progress to remediate issues before it receives an Accountability Program letter of inquiry, the Accountability Program may exercise its discretion to close the case via an Administrative Disposition.”). *See, e.g., In re: Outbrain (57-2015)*, Nov. 4, 2015. All prior Accountability Program decisions may be read at <http://www.ascreviews.org/accountability-program-decisions/>.