



Wine Institute Guidance Note on Digital Marketing Communications

Approved by Wine Institute Board on December 10, 2013
Effective January 01, 2014

Introduction:

This Guidance Note for responsible digital marketing communications is an integral part of Wine Institute's **Code of Advertising Standards** and should be read in conjunction with its provisions.

Wine Institute members recognize the increasingly important role of digital marketing as a valuable and appropriate tool to reach adult consumers and have developed these additional principles relevant to digital marketing as an extension of our Code.

Digital marketing activities are in a state of evolutionary development, where new trends are likely to occur rapidly. This Note will be reviewed on a regular basis and updated when necessary.

Scope:

This Note applies to branded digital marketing communications (paid and unpaid) of Wine Institute members, including but not limited to communications on websites such as social network sites and blogs, as well as mobile communications and applications.

Basic Principles:

1. Digital marketing communications are intended for adults of legal purchase age.
2. Digital marketing communications should not be placed in media where more than 28.4% of the audience is underage (determined by using reliable, up-to-date audience composition data).
3. Digital marketing communications on a site or web page controlled by the brand advertiser that involve direct interaction with a user should require age affirmation by the user prior to full user engagement of that communication to determine that the user is of legal purchase age.
4. User-generated content on a site or web page controlled by the brand advertiser should be monitored on a regular basis.

5. Digital marketing communications that are intended to be forwarded by users should include instructions to individuals downloading the content that they should not forward these materials to individuals below the legal purchase age.
6. Digital marketing communications on sites controlled by the brand advertiser must respect user privacy.
7. Digital marketing communications and product promotions must be transparent as brand marketing by being identified as such.

Definitions:

Direct Interaction is a two-way communication between the user and the brand advertiser on a site or web page controlled by the brand advertiser. It occurs when the user affirmatively interacts with the brand advertiser, such as responding to a direct communication from the brand advertiser.

Age affirmation is a process or a mechanism by which users affirm they are of legal purchase age. Age affirmation mechanisms may vary depending upon available technology and examples could include, among other things, an age affirmation page, an email or instant messaging age affirmation, or the use of a site's "registered user" database of users of legal purchase age.

User Generated Content (UGC) is material (including text, pictures, audios, and videos) that has not been created by the brand advertiser, but by a user. UGC that appears on a site or web page controlled by the brand advertiser should be monitored each business day or, at a minimum, every five business days. When content is determined to be inappropriate, the inappropriate material should be removed promptly. A disclaimer should appear saying that all inappropriate content generated by users will be removed from the site or web page over which the brand advertiser has control.

"Forwardable" content is any branded digital content placed on a site in a manner that is designed or enabled to be shared, such as with a share, download or email "button click." Such content should include instructions to individuals downloading the content that they should not forward these materials to individuals below the legal purchase age.

Privacy policies govern the collection of personal information from adults of legal purchase age and encompass any direct digital marketing or advertising controlled by the brand whether conducted through a social networking site, website or other digital channel and must ensure the following:

- Prior to the collection of any information, the brand advertiser will require that individual to affirm that they are of legal purchase age and user information only can be collected from those individuals who are of the legal purchase age.

- The brand advertiser shall employ a mechanism for a user to "opt-in" before receiving a direct digital marketing communication and to "opt-out" to discontinue receiving such direct communications.
- Clear information must be provided about collection and use of personal data. Under no circumstances will the information collected be sold or shared with third parties unrelated to the brand advertiser.
- Users should be encouraged to read the privacy statement before submitting their information.
- Measures will be taken to keep user information secure and protected from loss or theft.