

# Strategic Revision of Corporate Privacy Policy Enables IRA Company to Market to Extensive Social Media Audience

January 29, 2020

**Where we started:** Our attorneys counsel one of the nation's largest self-directed IRA companies on a wide range of cybersecurity and data privacy issues, including online advertising. This long-time client called us for advice because some employees wanted to use Facebook to market their products.

**Our strategy – plus more:** The concern about using social media to reach potential new audiences centered on whether their privacy policy allowed for such a marketing move. Now, our attorneys know this company very well because, to best serve their legal and business needs, we had already asked them very specific questions to learn what client information they have, how they got it, and how they're using it – as we do with all of our clients. Given this proposed marketing expansion, we knew we had to dig deeper into what we already understood about their operations, systems, and privacy and online policies. After close examination and analysis, we employed some creativity to revise their privacy policy.

**Upshot:** That revision enabled our client to expand their outreach efforts and market on Facebook. We continue to help them with day-to-day policies and procedures and are currently addressing any compliance issues they may encounter regarding General Data Protection Regulations (GDPR) and California statutes.