

For Immediate Release

## **CARU RECOMMENDS DUNCAN ENTERPRISES MODIFY WEBSITE TO BETTER PROTECT CHILDREN'S PRIVACY; COMPANY DOES SO**

*New York, NY – April 6, 2010* – The Children's Advertising Review Unit of the Council of Better Business Bureaus (CARU) has recommended that Duncan Enterprises modify the Website [www.ilovetocreate.com](http://www.ilovetocreate.com) to better protect children's privacy. The company has agreed to do so.

The Website came to the attention of CARU, the children's advertising industry's self-regulatory forum, through CARU's routine monitoring practices. The Website was featured in an advertisement that appeared in an issue of Discovery Girls, a magazine for children aged eight and older.

CARU monitors websites for compliance with CARU's Self-Regulatory Program for Children's Advertising, including guidelines on Online Privacy Protection, as well as with the federal Children's Online Privacy Protection Act.

The Website sells products manufactured by Duncan and displays the many different types of designs that can be created using Duncan products, which are available for sale for the creation of clothing, ornaments and decorations, ceramics, and other "do-it-yourself" projects. Registration is not necessary to browse the site, although users who wish to upload photos of their designs and rate others' designs must register.

Upon initial examination of the Website, CARU determined that there was no age-screening process to determine a potential registrant's age. Further, CARU found that registration required a potential member to provide personally identifiable information (PII) that included a username, first name, last name, e-mail, password, and telephone number, as well as billing information that included a first name, last name, phone number, and full mailing address.

CARU further found that the operator did not have in place a parental-consent mechanism or a privacy policy.

Following its review, CARU recommended that the Duncan implement a neutral age-screening process, complete with a session cookie so that underage users can not go back and change their ages and put in place parental consent procedures for underage users. CARU further recommended that the advertiser post its privacy policy.

The company, in its advertiser's statement, said that it has implemented CARU's recommendations.

"We agreed with CARU's recommendations and have since implemented both a Privacy Policy that is accessible on every page of [www.ilovetocreate.com](http://www.ilovetocreate.com) and the neutral age screening process for site registrations. Our parental consent procedure is also in place for successful registrations," the company said.

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***CARU's inquiry was conducted under NAD/CARU/NARB Procedures for the Voluntary Self-Regulation of National Advertising. Details of the initial inquiry, CARU's decision, and the advertiser's response will be included in the next NAD/CARU Case Report.***

**About Advertising Industry Self-Regulation:** The National Advertising Review Council (NARC) was formed in 1971. NARC establishes the policies and procedures for the National Advertising Division (NAD) of the Council of Better Business Bureaus, the CBBB's Children's Advertising Review Unit (CARU), the National Advertising Review Board (NARB) and the Electronic Retailing Self-Regulation Program (ERSP).

The NARC Board of Directors is composed of representatives of the American Advertising Federation, Inc. (AAF), American Association of Advertising Agencies, Inc., (AAAA), the Association of National Advertisers, Inc. (ANA), Council of Better Business Bureaus, Inc. (CBBB), Direct Marketing Association (DMA), Electronic Retailing Association (ERA) and Interactive Advertising Bureau (IAB). Its purpose is to foster truth and accuracy in national advertising through voluntary self-regulation.

NAD, CARU and ERSP are the investigative arms of the advertising industry's voluntary self-regulation program. Their casework results from competitive challenges from other advertisers, and also from self-monitoring traditional and new media. NARB, the appeals body, is a peer group from which ad-hoc panels are selected to adjudicate NAD/CARU cases that are not resolved at the NAD/CARU level. This unique, self-regulatory system is funded entirely by the business community; CARU is financed by the children's advertising industry, while NAD/NARC/NARB's primary source of funding is derived from membership fees paid to the CBBB. ERSP's funding is derived from membership in the Electronic Retailing Association. For more information about advertising industry self-regulation, please visit [www.narcpartners.org](http://www.narcpartners.org).