



Mobile Location Analytics

Mobile Location Analytics (“MLA”): Aggregated Insights about consumer behavior for retailers, based on technology using Wi-Fi or Bluetooth signals.



**FUTURE OF
PRIVACY FORUM**

Technology Overview

- * Mobile devices with Wi-Fi or Bluetooth capability broadcast a unique identifier known as a Wi-Fi or Bluetooth “MAC Address.”
- * In-store MLA sensors recognize the “pings” that the mobile device sends out to locate the Wi-Fi hotspot / Bluetooth signals.

Technology Overview (cont'd)

When the MLA data is logged:

- * MLA companies receive a feed of data from in-store Wi-Fi or Bluetooth sensors.
- * MLA companies *immediately* scramble the Wi-Fi or Bluetooth MAC address into a depersonalized, “hashed” version.
- * Companies then discard the un-scrambled MAC or Bluetooth address data.
- * Only the hashed version is maintained on MLA company’s servers.

This data is used to derive aggregated insights about in-store traffic that are shared with the retailer.

Principles for a Code

Enforceable code of conduct under which participating companies make concrete commitments to:

- * Provide clear, short & standardized privacy notices.
- * Maintain data in a de-identified or de-personalized form.
- * Require affirmative consent before consumers can be identified or contacted.
- * Create reasonable data deletion requirements.
- * Provide onward transfer restrictions.
- * Not use data for restricted purposes adverse to consumers.
- * Display conspicuous signage.

MLA Opt-Out

Companies make an enforceable commitment under the MLA Code.

- * Consumers can opt-out of collection and use of data for retail mobile location services.
- * Opting out means the Wi-Fi or Bluetooth MAC address won't be tracked, and won't be collected.

There is one central opt-out for all participating companies.

- * The opt-out is an easy-to-use process for consumers to securely submit Wi-Fi or Bluetooth MAC address.
- * The opt-out site includes educational information about Mobile Location Analytics.