



CASE STUDY  
January 30, 2015

## **Privacy Changes Help Start-Up Expand Its Trusted Virtual Wallet Service to Families Everywhere**

*“Oink is for today’s family. With our app and website, kids of all ages can learn to manage their money and shop online and offline in a secure environment. Kids budget, save, shop and buy what they want, with mom and dad monitoring and stepping in when desired. Not only is effectively engaging with parents and their children top-of-mind for our company, but ensuring we comply with privacy laws, as well. As Oink expands, we increasingly rely on ESRB Privacy Certified to ensure our company is compliant with all online privacy laws and best practices.”*

*- Ashley M. Kent, Counsel, Oink*

### **Family Fun with Oink**

[Oink](#) set out to make a payment service specifically for kids and teens by providing a safe way for them to budget, save, shop, and donate, while keeping parents involved in their children’s spending. And, now with the introduction of the Oink prepaid card, kids and teens can shop online and in-store. Parents can decide how much spending money they have in their account as well receive real-time notifications every time purchases are made at establishments that are not considered “family friendly” (excluding categories not limited to firearms, tobacco, and alcohol). As a virtual wallet, frictionless purchases can be made online using a username and password. For online games, purchases can even be restricted by rating. The Oink service is available with a number of online games, including Gaia and Wargaming.net as well as online retailers including K’nex and Hexbug. The company is currently in negotiations to expand even further, a process that requires a developer to add a small snippet of code.

### **The Basics of a Privacy Compliant Digital Family Wallet**

When Oink first approached [ESRB Privacy Certified \(EPC\)](#), they wanted to be able to operate their online site and mobile applications which engage users under 13, and wanted EPC to ensure their user data collection aligned with best practices and complied with the [Children’s Online Privacy Protection Act \(COPPA\)](#). EPC reviewed information about Oink’s business practices and data collection to ensure compliance with the COPPA rule change announced by the Federal Trade Commission in 2013. EPC also helped overhaul Oink’s children’s, European Union, and mobile privacy policies.

- Given the nature of their business, one privacy policy was not enough to ensure proper compliance and best practices. EPC worked with Oink to create a different privacy policy for their parent site, child site, and mobile app, ensuring all issues were addressed.
- Because Oink also conducts business in other countries, EPC ensured that each privacy policy was not only COPPA Compliant for the U.S., but also helped Oink secure “Safe Harbor” status in the EU and Switzerland.
- In addition to the privacy policy updates, EPC restructured their parental notice practices and just-in-time notifications.
- EPC also provided tips and pointers for improving the data practices of the entire website. Because of Oink’s popularity with younger audiences, special attention was given to data collection and sharing with third parties, advertising, and e-commerce.

Since its early beginnings with ESRB, the Oink service has changed and evolved into a general use site. With Oink’s updated service aspects, ESRB has continued to ensure that Oink has made a seamless transition, providing privacy by design solutions every step of the way.

**ESRB Privacy Certified** is a full-service online and mobile privacy program that helps member companies protect their brand reputation and enhance consumer trust. Learn more at [www.esrb.org/privacy](http://www.esrb.org/privacy).



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### Oink Using EPC to Instill Growth

Because of the nature of Oink's business, the need for EPC's services went much further than developing individualized privacy policies. Oink's growth was not only tied to increasing their user base, but to building and growing their vendor and affiliate marketing partnerships. Considering how easy it is for a developer to adopt Oink's code and become a partner, Oink's growth is on a fast trajectory. As a result, Oink needed a solution to ensure that when updates and changes took place, not only did their privacy policy reflect those advancements, but that they were conducting business with companies that were also compliant with online privacy laws and best practices.

EPC's individualized, hands-on service addressed these needs. Ongoing monitoring and reporting helped not only to ensure that Oink's policies were up-to-date, but that vendor privacy policies and data collection practices were also compliant, ensuring an effective and safe future.

### A Future of Consumer Trust

Today, Oink continues as an EPC member and is engaging more users and vendors under EPC's Safe Harbor protection. In the three years since partnering with EPC, Oink has:

- Received ongoing compliance reports twice a year, which have addressed necessary changes to their privacy policy as Oink has grown and ensured that third-party vendors and affiliate marketers are aligned with these policies.
- Grown to include hundreds of vendors, providing consumers with what they want while still protecting user online privacy rights.
- Become a leader in managing and implementing user transactions by successfully helping parents handle their children's online purchases with real-time parental notifications of their children's purchases, thus instilling user trust.

Moving forward, as Oink's user base and transactions grow, its partnership with EPC will continue to ensure best privacy practices with all transactions and data collection.