



CASE STUDY
July 10, 2014

ESRB Privacy Certified and Pokémon Improve Privacy Policy and User Experience

“Pokémon is in the entertainment business. In order to meet our goal of keeping children’s information, online and on mobile devices as secure as possible, we partnered with ESRB Privacy Certified, leveraging their privacy expertise and safe harbor protection. Using Veratad’s verifiable parental consent solution, we’ve been able to grow our business responsibly and in accordance with applicable law in the United States and other global territories.”

***- Don McGowan, General Counsel
The Pokémon Company International***

The Business Issue

In order to operate websites and mobile applications, which may engage users age 12 and younger, [Pokémon](#) enlisted the services of [ESRB Privacy Certified \(EPC\)](#) to ensure their user data collection aligned with best practices and complied with the [Children's Online Privacy Protection Act \(COPPA\)](#). Once the basic step of writing a privacy policy was completed, Pokémon and EPC collaborated with [Veratad Technologies](#) to create a user-friendly automated solution to verify parental consent, which is required under COPPA.

First, the Basics

EPC reviewed information about Pokémon’s business practices and data collection, updating their privacy policy and ensuring compliance with the COPPA rule change announced by the Federal Trade Commission in 2013;

- As part of this review process, Pokémon’s privacy policy was expanded to include all internet services including websites, mobile devices, and gaming platforms;
- EPC continues to support Pokémon’s self-certification with the U.S. Department of Commerce’s, E.U., and Swiss Safe Harbor privacy programs;
- Given Pokémon’s popularity with younger audiences, special safeguards are needed for data collection and sharing with third parties, advertising, and e-commerce.

The Innovation

Pokémon wanted to improve the user experience of collecting credit card information from parents as verification of their consent to collect personally identifiable information (PII) from their children. This interest aligned perfectly with EPC’s partnership with Veratad Technologies. Veratad provides age and identity verification services for a variety of companies and industries by instantly comparing a user’s data entry against billions of records from multiple trusted data sources. The result is an API that can be easily integrated into websites and mobile applications providing verifiable parental consent without using a credit card transaction or other cumbersome methods.

The Results

- Pokémon is an EPC member and is engaging more users under EPC’s safe harbor protection while protecting brand reputation and user trust
- Pokémon generates an average of nearly 300 user endorsements a month of their privacy policy
- An average of 40,000 parents are able to complete the verification process each month

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.