

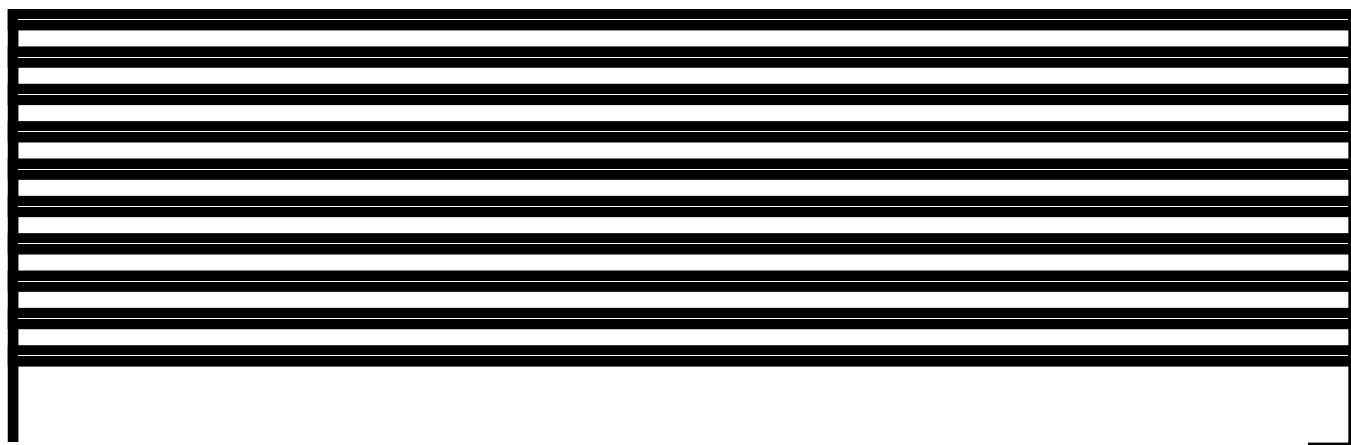
FTC Releases “Start with Security” Guide to “Practical Lessons” From Data Security Enforcement Actions

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As part of its ongoing outreach efforts to educate businesses about the importance of data security practices, the FTC has released a list of “10 practical lessons” drawn from its previous data security enforcement actions. The list, entitled “,” acknowledged that the FTC’s 50-plus data security enforcement actions are only binding on the individual companies subject to each action, but states that “learning about alleged lapses that led to law enforcement can help your company improve its practices.” In addition to ten “lessons,” the list included several subcategories of advice for each lesson drawn from prior FTC enforcement actions. As with all FTC “best practice” guides, this document does not state binding rules of law, but is a view into the FTC’s thinking on data security enforcement.

Here’s a brief overview of the matters included in the FTC’s list.



As part of its broader “Start With Security” initiative, the FTC is planning a series of conferences on security issues aimed at small- to medium-sized businesses. The first conference, scheduled for September 9 in San Francisco, will focus on start-ups and developers and cover topics such as security by design, common security vulnerabilities, strategies for secure development, and vulnerability response. The FTC has also launched a new website that from prior cases, public statements, advocacy filings, and other activities.

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