

Social Media Disclosure Guidelines

When to Disclose Material Connections:

- When receiving financial consideration or payment from the Advertiser;
- When receiving non-financial compensation, such as a gift or free product from the Advertiser;
- When there is a family relationship between you and the Advertiser;
- When there is a connection between you and the Advertiser where the connection isn't apparent;
- When pinning or posting a photo wearing, showing or talking about the Advertiser's brand, products or services;
- When tagging the Advertiser's brand, products or services;
- You must disclose material connections each time when including previously sponsored products/services in successive posts. You cannot assume consumers have read previous posts where the disclosure was originally inserted.

Guidelines for the Disclosures:

- You must disclose your relationship with the Advertiser in your social media posts, pins, photos, videos, or anything that represents an endorsement or testimonial of the Advertiser's brand, products or services. Disclosures and/or disclosure hashtags must be clear, conspicuous and in close proximity to the ad or post itself. They must be placed "above the fold", which is generally within the first three (3) lines of the copy, description or blog post and in words that are clear, visible and preferably in a different color than the background color. For videos, written disclosures must remain on the screen long enough to be read and understood. In addition, for videos, disclosures should be periodically shown on the screen for those viewers who may have missed the disclosure at the beginning of the video or skipped ahead.
- Your disclosures and/or disclosure hashtags CANNOT be at the end of an ad, description or blog post, require a user to click "more" to see the disclosure or hashtag, be "below the fold", or hide the disclosure or hashtag among many other hashtags.

- Examples of the types of disclosures you may use in your social media posts containing, referencing or featuring Advertiser’s brand, products or services include the following prefixes/designations:
 - “Ad” or #Ad
 - “Advertisement” or #Advertisement
 - “Sponsored” or #Sponsored
 - “Promotion” or #Promotion
 - “Paid” or #Paid
 - #[BRAND] Ambassador
 - #[BRAND] Sweepstakes/Contest (for giveaways/sweepstakes/contests)

- You may create a disclosure statement of your own so long as it contains clear, obvious disclosure language that adheres to the general guidelines stated herein. Some other approved disclosure statements are: “This post is sponsored by...”; “This blog post was paid for by...”; “I received a free product in exchange for this post by...”; and/or “This product was given to me by...”

- Your disclosure statements must be placed to be sufficiently visible and obvious to your social media followers and post viewers. See above for placement requirements.

- Your disclosure statements must be viewable on all devices and technical platforms.

Guidelines for the Content in the Disclosures:

- You may not make any knowingly untruthful or misleading claims in your post about the Advertiser or its Affiliates, or the brand, products or services you feature or display in your post.

- You may not make any product claims in your post that might require proof that you do not have in your possession and that you did not directly experience yourself. You should make a reasonable inquiry about the performance or features of a product before you make any claim about it in your post.

- If your post(s) include(s) a brand, product or service endorsement or testimonial, you may not endorse in your post any product(s) that you have not personally tried, or include an endorsement or testimonial supplied by another person for a product that they have not personally tried.

- Any product endorsement must reflect a user’s typical experience with the product. If your post or ad claims specific results with the Advertiser’s product or service, these specific results are usually interpreted to mean that your experience reflects what others can also expect to achieve or see when using the product or service. Therefore, if your post or ad claims a specific result with the Advertiser’s product or service, you must disclose that your experience/results are what consumers should **generally** expect from

the product in the circumstances depicted in your post/ad, and ***not typical results*** with the product. In addition, in order to endorse a product as having specific results, you must have adequate proof to back up the claim that the results shown in your post or ad are either: i) typical, or ii) you must clearly and conspicuously disclose the ***generally expected performance in the circumstances shown in your post or ad***. Disclosures such as “Results not typical” or “Individual results may vary” are not sufficient. **The bottom line is the generally expected results disclosure cannot be fabricated or exaggerated; you should not use the endorsement if you do not know or cannot back up the generally expected results claim.**

QUESTIONS? REACH OUT HERE:



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