

INFLUENCER DISCLOSURE POLICY

This Influencer Disclosure Policy (the “Policy”) shall outline the rule and procedures around proper disclosures for influencers (“Influencer”), when creating content for which they are paid by an advertiser (the “Advertiser”):

All influencers must comply with the FTC’s [Guides Concerning the Use of Endorsements and Testimonials in Advertising](#) and related [FAQs](#). This document provides some highlights and examples. Please review the FTC endorsement guides and this document carefully. If you fail to disclose your connection to an Advertiser or Influicity, they may discontinue their relationship with you.

When Must I Disclose?

- You must disclose your connection to Advertiser if:
 - o You distribute or publish a post, tweet, video, photo, or other message that consumers are likely to believe reflects your personal opinions, beliefs, findings, or experiences,
 - o The message promotes the Advertiser or its products or services, AND
 - o You are receiving payment or incentives from Advertiser or a third party on behalf of the Advertiser (e.g., payment, free products, discounts, promotional items, travel and meal expenses, sweepstakes entries, etc.).
- Even if you are only retained by the Advertiser to do one thing (such as create a piece of content promoting a Advertiser product) you should also disclose your connection to Advertiser when you promote Advertiser or that same Advertiser product through other social media channels (e.g., if you send out a tweet, or make a Facebook post).
- When in doubt, DISCLOSE your connection to Advertiser.

What Do I Have to Say?

- Disclose that you received a payment or incentive from Advertiser and the nature of your relationship
 - o No specific wording is required unless Advertiser has specified a disclosure for a particular promotion (e.g., a promotion-specific hashtag).
 - o Feel free to use your own voice and/or put the disclosure in context. (Replace “Advertiser” with the name of the Advertiser or brand name).
 - *Advertiser sent this video to me for free so I could review it.*
 - *I would buy this even if Advertiser did not give it to me for free.*
 - *Paid Promotion for Advertiser*
 - *Advertiser brought me in and paid me so I could make this video for you*
 - *Financial Support provided by Advertiser*
 - *This video is part of an Advertiser promotional campaign.*
 - *Free products and other consideration for my participation has been provided by Advertiser*
 - *This video is brought to you by Advertiser*
- Be honest. Make sure your statements (including those you share or retweet) are true and not misleading.
 - o Don’t give an opinion on a product/service you haven’t tried. Any statement should reflect your personal experience and honest opinion.
 - o Do not hold yourself out as an ordinary fan or consumer, but you can say you are also a fan and/or consumer.

- Include any other special disclosures that need to be disclosed (e.g., *Results may vary*, *Restrictions may apply*). Check with your business contact if you are unsure about other disclosures.
- Do not disclose any confidential information, including non-public plans or production secrets.
- Do not promote or link to unauthorized Advertiser content.
- Do not use Advertiser names, trademarks, clips, or other IP without permission.

How Do I Say it?

- **Social Media, Twitter, Blog Posts**
 - o Put the disclosure in the post, message, or tweet itself.
 - o Make your relationship with Advertiser clear in every post, tweet, or message, even if it is already in your profile or in prior posts or tweets.
 - o Use hashtags to work with space limitations.
 - o Make sure the disclosure can travel with your post, tweet, or message. Put the hashtag first or leave room so it is not cut off if your message is re-posted, re-tweeted, or shared.
 - o Include the disclosure even if you are re-posting, re-tweeting, or sharing someone else's content.
 - o For an ongoing conversation (such as a live blog, reddit AMA, or live tweeting session), make periodic disclosures every 3 to 5 minutes over the course of the post/session.
 - o For a post or tweet that drives traffic to a video or image on another site or platform:
 - If the post or tweet just drives traffic to a promotion without mentioning or showing an image of the brand or product, the post or tweet does not need a disclosure (e.g., "*You won't believe what happened at Comic-Con. Take a look.*"), but the disclosure must still be in the video or on the photo itself once the user clicks through the link.
 - If the text of the post or tweet itself promotes the product or brand by mentioning or showing an image of it, put a disclosure both in that post or tweet and in the video or on the photo itself (e.g., "*I love this new [product] from [BRAND]. Click here to see how much. #Ad*").
- **Video**
 - o Put a written disclosure in the video itself at the beginning and at the end of the video. Include a disclosure in the text box immediately below the video in addition to the disclosures in the video.
 - For videos on Vine, a written disclosure in the text box is sufficient.
 - Oral disclosures may be OK in some circumstances. Talk with your business contact.
 - o Disclosure can take the form of a banner, caption, or watermark on the screen and/or a title and end card.
 - o Make the disclosure stand out (e.g., bold, italic, and/or different color font).
 - o If the platform runs ads on the screen, place the disclosure where they will not be obscured (e.g., YouTube may run ads across the bottom of the video).
 - o For longer videos (more than 3 minutes) or on-going streaming, leave the disclosure on screen throughout or make periodic disclosures. For example, consider showing a disclosure: (i) at the beginning and end; (ii) every 3 to 5 minutes; and (iii) whenever there is a direct call to action telling viewers to buy or rent a Advertiser product or see a Advertiser film or show.
- **Photos & Images**
 - o Posting a photo or image may promote Advertiser products and services, and therefore require disclosure, even if there is no accompanying text (e.g., posting a movie poster on Pinterest or Instagram).

- o If possible, include a disclosure on the image as you would for a video (above). If not possible to include a disclosure on the image itself, talk with your Advertiser contact about how best to make a prominent and unavoidable disclosure alongside it (e.g., in a Facebook post).
- **Contest & Sweepstakes**
 - o Posting, tweeting, or sharing something in return for an entry into a contest requires a disclosure.
 - o If you are running or posting about a sweepstakes, contest, or other Advertiser promotion:
 - Consult with your Advertiser contact to include proper disclosures.
 - Unless Advertiser has specified a particular hashtag for the promotion, use *#AdvertiserPromotion*, *#Contest*, *#Sweepstakes* (not *#sweeps*).
 - Contest rules should be labeled as rules, not an unidentifiable bit.ly link (e.g., “*Enter for a chance to win. **ContestRules***”).
 - Require participants to identify each post or tweet as a contest entry (“*Tweet your photo of your mom for a chance to win. Don’t forget to include **#MomContest** in every tweet. **ContestRules***”).