

The Cybersecurity Law Report Quotes Partner Dana Rosenfeld on the FTC's Start With Security Guide and Stick With Security Series

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Partner [Dana Rosenfeld](#) was quoted in *The Cybersecurity Law Report* article "FTC Launches Stick With Security Series, Adding Detail and Guidance to Its Start With Security Guide (Part Two of Two)." The FTC launched its Stick With Security series, a series that builds on the 10 principles in its 2015 Start With Security guide. The Start With "was very well received by both in-house and outside counsel. By tying data security concepts to actual enforcement actions, it highlights the importance of those concepts and backs up the advice and recommendations we provide to our clients," Dana noted. She believes the Stick With series is also helpful in the same ways. "In addition, by discussing practices that would be found acceptable and those that would not, the examples in the posts help companies with line drawing and balancing risk. As outside counsel, it's great to be able to point to specific examples provided by the FTC as the basis for my recommendations."

Although many of the FTC suggestions seem common-sensical, Dana believes the suggestions are helpful and that people still need to be reminded of these basic principles. "Some of the FTC's recent enforcement actions relate to practices identified as problematic in 'Start With,' demonstrating that companies often do not adequately consider or implement FTC guidance when developing and launching new products," she said.