The Online Interest-Based Advertising Accountability Program (Accountability Program) initiated a formal inquiry to determine whether Gravity (the company) was engaged in online behavioral advertising (OBA) practices as suggested by statements in its Web site privacy policy, and if so, whether the company’s OBA practices were in compliance with the Self-Regulatory Principles for OBA (OBA Principles). The Accountability Program also questioned whether the company’s opt-out mechanism complied with the industry standard duration of five years.

The company represented that it is not currently engaged in OBA. Our inquiry developed no information to the contrary, so the Accountability Program is closing the case administratively. If we find that the company is engaging in OBA activity in the future without compliance with the OBA Principles, we will open a new inquiry or take other appropriate action. The Accountability Program appreciates the company’s willingness to change the duration of its opt-out to meet the industry standard of five years and has
tested and confirmed the change.

Gravity chose not to participate further in the inquiry process.

**DISPOSITION**

Administratively closed based on Gravity’s representation that it is not engaged in OBA.

Genie Barton  
Vice President and Director  
Online Interest-Based Advertising Accountability Program and Mobile Marketing Initiatives