

WILSON SONSINI

Christopher N. Olsen

PARTNER

Privacy and
Cybersecurity
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FOCUS AREAS

Advertising, Promotions,
and Marketing
Federal Trade Commission
Privacy and Cybersecurity

HIGHLIGHTS

- Privacy and Data Security Expert with Track Record of Success**
Chris advises clients on all aspects of privacy and cybersecurity matters, and represents companies under investigation by the FTC and state attorneys general. He has successfully resolved investigations without enforcement action, and clients regularly seek his guidance when faced with regulatory scrutiny.
- Former Agency Deputy Director with Extensive Government Background**
Chris is a former deputy director of the Bureau of Consumer Protection at the FTC, and previously was the assistant director of the FTC's Division of Privacy and Identity Protection. He also served in a variety of roles at the FCC.
- A Leader in His Field**
He is recognized among the nation's top privacy attorneys by *Chambers Global*, *Chambers USA*, and *the Global Data Review*. Clients "hold him in tremendously high regard" noting that he is "really smart and practical and offers excellent client service" and a "brilliant leader and creative thinker."
- Chris is a frequent contributor to The WSGR Data Advisor**



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EXPERIENCE

Christopher Olsen is a partner in the Washington, D.C., office of Wilson Sonsini and co-chair of the firm's privacy and cybersecurity practice. Chris advises clients on all aspects of privacy and cybersecurity matters and represents companies under investigation by the Federal Trade Commission and state attorneys general. He has an established track record of success in resolving investigations without enforcement action and clients regularly seek his guidance when facing high-stakes regulatory scrutiny.

Chris is a former deputy director of the Bureau of Consumer Protection (BCP) at the Federal Trade Commission (FTC), where he directed the international work of the Division of Privacy and Identity Protection and acted as the agency's co-lead negotiator in discussions with the European Commission regarding improvements to and renewal of the U.S.-EU Safe Harbor Framework.

Prior to joining the bureau director's office, Chris was the assistant director of the Division of Privacy and Identity Protection at the FTC. In this role, he managed a number of significant privacy and security enforcement actions, as well as several of the most important privacy initiatives in recent FTC history, including a seminal 2012 FTC report on consumer privacy that formulated important recommendations for businesses.

Previously, Chris served in a variety of roles at the Federal Communications Commission (FCC), including deputy chief of the FCC's Enforcement Bureau, where he directed several of the most significant enforcement matters in the commission's history, including the agency's first net neutrality order; its first actions enforcing the National Do-Not-Call requirements; and multimillion-dollar cases involving local competition and consumer protection rules.

Prior to joining the FCC, Chris was a partner at Howrey Simon Arnold & White, LLP, where he managed a variety of complex litigation matters.

CREDENTIALS

Education

- J.D., University of Virginia School of Law, 1989
- A.B., English modified by Government, Dartmouth College, 1986
Cum Laude

Associations and Memberships

- Vice Chairman, Privacy and Information Security Committee, Section of Antitrust Law, American Bar Association, 2019-2022
- Member, Education Advisory Board, International Association of Privacy Professionals, 2017-2019

Honors

- Named in the 2020-2024 editions of *Chambers Global*
- Named in the 2019-2023 editions of *Chambers USA: America's Leading Lawyers for Business*
- Named as a "Top Lawyer" in the cybersecurity category by *Washingtonian* magazine in December 2017
- Recipient, Award for Excellence in Supervision from the Federal Trade Commission for "an exceptional ability to guide, empower, and motivate staff . . . to protect consumer privacy through groundbreaking cases and innovative policy efforts" (September 2012)
- Recipient, Mary Gardiner Jones Award from the Federal Trade Commission for "active volunteer efforts that have benefited the FTC community, the employee's community or state, or the nation" (October 2010)
- Recipient, Silver Award from the Federal Communications Commission for "sustained exceptional accomplishments related to the mission and objectives of the Commission" (October 2006)

Admissions

- Bar of the District of Columbia

MATTERS

Representative Regulatory Matters

- Lead counsel for Google and YouTube in COPPA enforcement action brought by FTC and New York Attorney General. Successfully negotiated consent agreement resolving allegations.
- Successfully represented major online commerce provider in FTC investigation. Case closed with no enforcement action.
- Successfully represented electronic products manufacturer in FTC privacy investigation. Case closed with no enforcement action.
- Successfully represented fitness device manufacturer in FTC investigation. Retained as counsel after FTC informed company it was proceeding with a complaint alleging privacy and security violations; convinced the agency to close the case with no enforcement action.
- Successfully represented internet security company in FTC data security investigation. Case closed with no enforcement action.

- Successfully represented media company in FTC advertising investigation. Case closed with no enforcement action.
- Successfully represented children's service in FTC COPPA investigation. Case closed with no enforcement action.
- Successfully represented ad tech company in FTC inquiry. Matter closed without formal investigation.
- Successfully represented communications company in FTC FCRA investigation. Case closed with no enforcement action.
- Successfully represented electronic products manufacturer in FTC advertising investigation. Case closed with no enforcement action.
- Represented maker of electronic learning devices in FTC COPPA investigation; successfully negotiated consent agreement resolving allegations.
- Currently representing electronic products manufacturer in state AG data security investigation.
- Currently representing makers of mobile health apps in state privacy inquiries.
- Currently representing AI technology provider in FCC privacy-related inquiry.
- Currently representing electronic entertainment company in FTC investigation.
- Currently representing ISP in FTC 6B study of ISP privacy practices.

INSIGHTS

Select Publications

- Co-author, "Round Three: FTC Proposes Further Restrictions on Meta's Privacy Practices and a Complete Prohibition on Meta Monetizing Youth Data," *Wilson Sonsini Alert*, May 5, 2023
- Co-author, "New Legal Requirements for Online Marketplaces: The INFORM Consumers Act," *Wilson Sonsini Alert*, February 6, 2023
- Contributor, "Accountability to Data Subjects and Regulators," *The Guide to Data as a Critical Asset, Global Data Review*, 2022
- Co-author with J. Ferris, "Five Things to Know About Net Neutrality," *WSGR Alert*, December 10, 2015
- "Comcast Enters into Largest Privacy Settlement on Record with California Attorney General," *The WSGR Data Advisor*, November 2015

Select Speaking Engagements

- Speaker, "So You Just Got a CID: What's Next?" IAPP Practical Privacy Series, December 2016
- Speaker, "Privacy, Encryption, and Consumer Rights: A New Boardroom Challenge," Stanford Directors' College, June 2016
- Speaker, "History of Self-Regulatory Enforcement," Online Interest-Based Advertising Accountability Program's Consumer Privacy and Digital Advertising Innovation Conference, May 2016
- Keynote Speaker, Future of Privacy Forum Advisory Board Meeting, April 2015
- Co-moderator, "Privacy Implications Associated with Broadband Internet Access Services," Federal Communications Commission Workshop on Broadband Consumer Privacy, Washington, D.C., April 2015
- "Data, Lending, and Civil Rights," Georgetown Center on Privacy and Technology Symposium, Georgetown University Law Center, Washington, D.C., April 2015
- Panelist, "Big Data: Privacy and Data Security Issues for Media and Communications Companies," FCBA and ABA Symposium, Washington, D.C., March 2015
- Panelist, "Raising the Bar for Privacy and Data Security: The Role of Self-Regulation in the New Frontier," IAPP Global Privacy Summit, Washington, D.C., March 2015
- Panelist, "An Exposé on How the Internet of Things Impacts Individual Industries," International Consumer Product Health and Safety Organization Annual Meeting, Orlando, Florida, February 2015
- "Brand New Web: Privacy and Security Implications of Connected Consumer Devices and the 'Internet of Things,'" FCBA Privacy and Data Security Committee, February 2015