

ISBA

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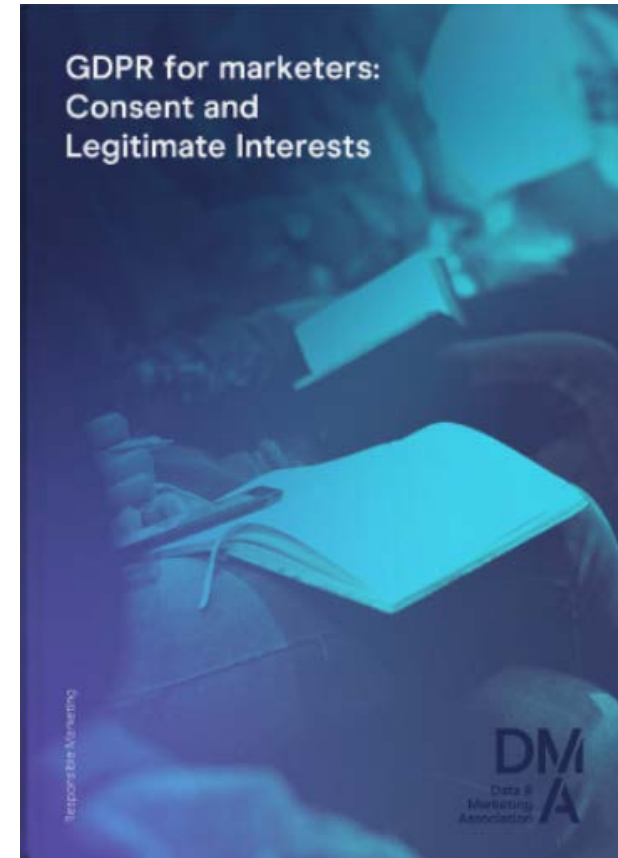


/ Digital Advertising Checklist



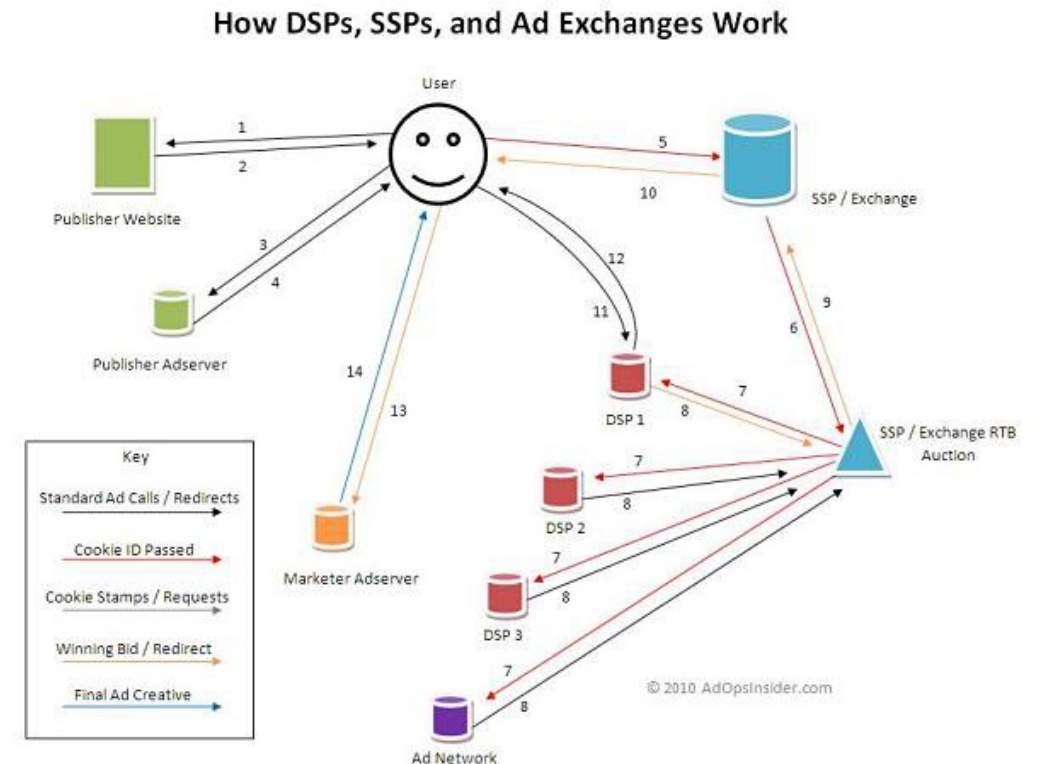
/ 1 Education and understanding

- Educating consumers
 - No one really understands what's going on and what's at stake
(Harris Poll ICO/Ofcom)
- Educating marketers
 - Black box solutions, defer to agency
 - Codes of conduct
 - Trade bodies
 - Enforcement action
 - Transparency



/ 2 Understand your data journey

- Companies are accountable for the personal data they process
- Define use cases for the collection and transfer of personal data
- Contracts are not sufficient, auditing is required.



/ 3 Conduct a Data Protection Impact Assessment (DPIA)⁵

- A DPIA will help assess whether the impact of processing is proportionate.
 - Data minimisation
 - Privacy by design
 - Identifies risk



Sample DPIA template

This template is an example of how you can record your DPIA process and outcome. It follows the process set out in our DPIA guidance, and you should read it alongside that guidance and the [Criteria for an acceptable DPIA](#) set out in European guidelines on DPIAs.

Start to fill out the template at the beginning of any major project involving the use of personal data, or if you are making a significant change to an existing process. Integrate the final outcomes back into your project plan.

Step 1: Identify the need for a DPIA

Explain broadly what the project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

/ 4 Audit your data privacy management⁶ and supply chain

- Scrutinise suppliers
 - Due diligence
 - Insist on evidence
 - Contract
- ISO 27001 Information Security Management
- ISO 27701 Privacy Information Management

GDPR Recital 81:

“when entrusting a processor with processing activities, the controller should use only processors providing sufficient guarantees, in particular in terms of expert knowledge, reliability and resources, to implement technical and organisational measures which will meet the requirements of this Regulation”

/ 5 Ensure special category data has⁷ explicit consent

- Special category data requires explicit consent
- It can be collected unintentionally from behaviours, combining data and also context
- Understand what data you are processing, the risk and how you demonstrate consent
- Avoid processing in possible

Art. 9 GDPR

Processing of special categories of personal data

1. Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited.

/ 6 Ensure that commercial benefits are assessed in context of risk

- Is the risk worth the return?

What is Marketing Attribution?

The Short Definition: Put simply, marketing attribution is the analytical science of determining which marketing tactics are contributing to sales or conversions.

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