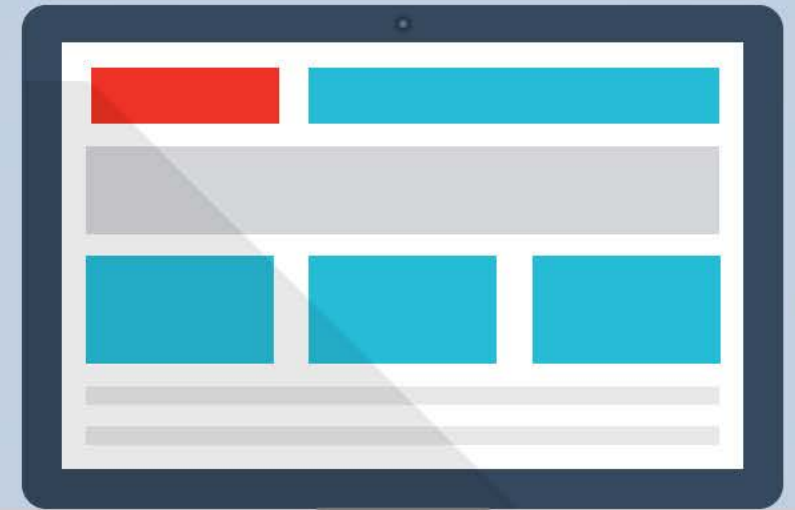


Breakout session: **RTB** bid request data fields

ICO Adtech Fact-Finding Forum 2
19 November 2019



Bid requests: Data fields

- Bid request IDs
- Site/app details
- Impression details
- Video details
- Publisher details
- Content details
- Device information
- Geo-location
- User information



Bid requests: The special category data issue

GDPR Article 9(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”.

Bid requests: The special category data issue

Are special categories of data deliberately or inadvertently included within the RTB process?

A dilemma



Understanding
the context

Vs.



Understanding
the user

Potential solutions?

- Strip out personal data?
- Remove content 'taxonomies'?
- Apply anonymisation techniques?
- Disguise/mask URLs?
- Obtain explicit consent?



Bid request data fields: **Key questions**

1. What is the minimum amount of user data required within RTB bid requests?
2. To what extent is data that could reveal sensitive information about users actually required within bid requests?
3. What are the key considerations when determining which data fields to include within bid requests?
4. What is the scope for removing personal data, including special category data, from bid requests?

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