

GDPR – What Does It Mean for Display Media?



Executive Summary

On May 25, 2018, a new anti-spam law called GDPR (General Data Protection Regulation) will go into full effect in the European Union (EU). This new law regulates how personal data can be used for digital advertising measurement and targeting. This provides consumers more control over how their data is used and puts pressure on data collectors, publishers and tech platforms to be compliant.

It is anticipated that this new policy will affect brands advertising in the United States. This will, in fact, impact YouTube measurement within the United States immediately, so it is important for brands to not only be aware of GDPR, but also develop a plan to address an impending global rollout should that, in fact, occur.

Changing the Approach to Personal Data

GDPR puts personal data control and rights back in the hands of EU residents. In terms of digital marketing, it requires that cookies and pixels used as consumer identifiers be treated as personal data. In order to be compliant, companies must



ensure that consent for storing personal data is “freely given” by consumers. Brands must explicitly explain and educate users in the European Union about how their personal data will be used after they opt in. Personal data may include a cookie that contains information such as IP addresses, customer IDs, or other personally identifiable information.

Google goes one step further in limiting what information about consumers can be passed back to third-party measurement platforms: Google will now restrict the use of the DoubleClick ID for data transfers for brands advertising in EU countries. This will be a significant change because many measurement platforms use the DoubleClick ID as the architecture of their reporting of attribution, reach and frequency.

Key Points

DIGITAL MEDIA & PROGRAMMATIC PERSPECTIVE

Measurement: Google has removed the DoubleClick ID, which measures deeper reach, frequency and cross-platform attribution, from their Data Transfer reports.

- This currently only affects EU traffic but could roll out globally.
 - » At a global level, Google will also no longer provide cookie ID or user list names from its programmatic exchange, AdX.
 - » Data Transfer reports were a popular method of gathering multichannel campaign analytics.
- GDPR limits how consumers' data can be gathered. Data collection will be limited to first-party vendors. For items such as verification and brand studies, Google approved a small number of vendors allowed to track media for measurement purposes.
 - » This will impact clients with YouTube campaigns and Crossix measurement as YouTube is moving away from the use of pixels and cookies. Even though Crossix uses Millward Brown pixels, YouTube will not allow Crossix to measure YouTube.

- While we expect alternative solutions to arise, Google also created Ads Data Hub, a GDPR-compliant, pixel-less measurement solution. Third-party vendors will need to be approved by Google to access data via Ads Data Hub.



Inventory: Publishers need to be in compliance. The industry already has Interactive Advertising Bureau (IAB)-registered solutions called [consent management platforms](#). Google has created a consent-gathering tool called “[Funding Choices](#),” which allows a supply chain partner to share consent with 12 vendors. This is a drastic restriction for a publisher like Time Inc., which has 153 vendors that can sell inventory. The implementation of [ads.txt](#) also resulted in publishers decreasing the number of vendors to eliminate unnecessary middlemen and fraud.

- Publisher data pools and the number of sellers could decrease, which could affect marketplace pricing.

Targeting: Data companies are quickly evolving. They are pushing for consent to live within the programmatic platforms but also preparing their data offering to use cookieless targeting options. Data that is not compliant will be pushed out of the marketplace.

- This doesn't change our current targeting approaches, but may be a future consideration for brands.

Implications for Pharma

In time, using Google Data Hub's pixel-less measurement may yield more access to cross-screen conversions that are currently unable to be tracked by pixels. It is anticipated that third-party reporting platforms will change how data can be gathered for reporting and analysis.

GDPR is top-of-mind for programmatic, ad serving and measurement platform partners Intouch accesses.

As such, our partners have created cross-functional teams to get ahead of regulations and ensure compliance.

To do this, they have updated their privacy tools, while implementing the IAB EU's Transparency and Consent Framework, building compatibility with Google's proprietary consent framework and launching user-facing data-access portals so users can access their personal data for permissioning purposes.

Conclusion

Although these new Google policies and EU laws currently only apply to European countries and YouTube measurement in the United States, we are anticipating a more comprehensive global rollout in the not-too-distant future; speculation is Q1 2019. Intouch is working with our Google partners to stay ahead of the situation so that smart strategies for affected campaigns can be implemented as seamlessly and expediently as possible.

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