



ELITE SEM
Performance Driven Digital Marketing®



Andrew Richardson
VP, Analytics & Marketing Science

REDCL  **VER**
ADVISORS



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The word cloud features the following terms in various sizes and orientations: security, marketing, privacy, technology, policy, confidential, consumers, legal, pixels, data, digital, access, rights, targeting, protection, tracking, online, information, advertising, and individual. The words are set against a blue background with a hexagonal grid pattern and several padlock icons.

AD TECH EVOLUTION

1993

first banner ad



2000

Google AdWords launched



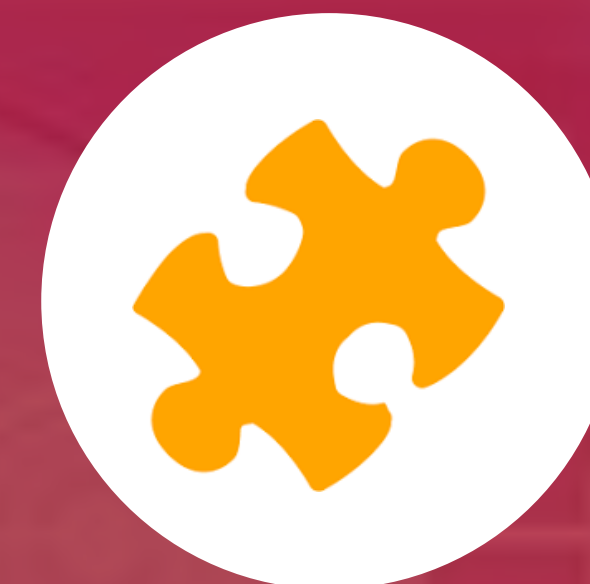
2008

use of ad networks begin



2018

complex landscape



2019 +

1993



1995

world's first ad network
160 styles syndicated



Early 2000s

early popup blocking
began



2012

ad exchanges



FUTURE



**Where are we
being tracked?**

Why everyone should

care about PRIVACY?



61%

Six in 10 Americans have said they would like to do more to protect their privacy

64%

support more regulation of advertisers

2/3

have said current laws are not good enough in protecting people's privacy

Just

9%

of social media users were "very confident" that social media companies would protect their data

about

half

of users were not at all or not too confident their data was in safe hands



Android

VS

•



iPhone

Privacy is good business

Customers will choose companies with privacy & security as a priority and who are compliant

Privacy baked into website design will encourage website visitors to share more data

Choice and preference are critical—focus should be on engagement, not just list size

Compliance Laws **Can Actually Help** **The Operation** **of Your Business**

It can be a competitive advantage.

It may even make you more efficient.

PERSONAL DATA EXAMPLES



Examples of online identifiers (GDPR & CCPA)

Any moniker used for online presence—social media,
e-mail, instant messenger

ID number

IP addresses

Geolocation

“Cookies”

Others





Sensitive personal data

EU Definition: Personal data is any information about a living individual who could be identified from that data, either on its own or when combined with other information.

There is also a classification called “sensitive personal data,” which means any information concerning an individual’s:

- Racial or ethnic origin,
- political opinions,
- religious or philosophical beliefs,
- trade union membership,
- health data,
- genetic data,
- biometric data,
- sex life or sexual orientation,
- past or spent criminal convictions

CALIFORNIA CONSUMER PRIVACY ACT



CCPA applicability

The CCPA applies to businesses, which are defined as for-profit organizations that collect personal information about residents in California, determine the purpose and means of the processing, does business in the state of California, and that meets one or more of:

- (i) annual gross revenues in excess of twenty-five million dollars (\$25,000,000),
- (ii) alone or in combination, annually buys, receives, sells, or shares for commercial purposes, the personal information of 50,000 or more consumers, households, or devices, or
- (iii) derives fifty percent or more of its annual revenues from selling consumers' personal information.

Out of scope: those complying with other federal privacy laws such as HIPAA and GLBA

CCPA

non-compliance consequences

Regulatory fines:

\$2,500 per violation

\$7,500 per intentional violation

Individual right of action:*

\$100-\$750 of action per infraction for a data breach if no reasonable security measures employed

Brand reputation

Loss of customers

Negative PR

* Amendment may extend the individual right of action

CCPA

amendments

(as of 4/2019)

- A toll-free number or email address can be provided for an individual to opt out of the sale (still need the homepage link)
- **“Personal information” does not include consumer information that is de-identified or aggregate consumer information** and “public records” (lawfully made available from federal, state, or local government records. Does not mean biometric information collected by a business without the consumer’s knowledge) is excluded as well
- Personal information now only covers information that is **“reasonably capable** of being [so] associated”
- Employees are not consumers and therefore are excluded from CCPA
- Businesses can offer “a different price, rate, level, or quality of goods or services to a consumer, including offering its goods or services for no fee, if any of the following are true”—generally speaking, loyalty programs are ok
- Allows information to be shared between a new motor vehicle dealer and vehicle’s manufacturer, if the information is related to a repair, warranty work or recall without being subject to individual rights bills
- For insurance companies and agents, privacy notices with information on how to opt out of disclosures as well as requiring a comprehensive written information security program required

Do not sell my personal information

- Businesses must notify users
- Requires opt-in consent from minors
- Mandatory “Do Not Sell My Personal Information” link on homepage
- Non-discrimination on services for exercising CCPA rights
- Businesses may charge a different price if the price difference reasonably related to value of individuals’ data
- Selling” defined as “**selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally**, in writing, or by electronic or other means, a consumer’s personal information by the business to another business or a third party for monetary or **other valuable consideration**”



Selling children's data? It requires consent

**Children under the
age of 13:**

Requires opt-in with
parental consent

**Children
between 13-16:**

Requires opt-in consent
from that child



GDPR Individual Rights

with personal data

- ▶ Right of **access**
- ▶ Right of **rectification**
- ▶ Right to **erasure** (right to be forgotten)
- ▶ Right to **restrict processing**
- ▶ Right of **data portability**
- ▶ Right to **object to processing**
- ▶ Right to **not be evaluated** on the basis of automated processing



CCPA Individual Rights



- 1. Right to know categories**
- 2. Right to know the sources and third parties data shared with**
- 3. Right of Data Portability**
- 4. Right to Deletion/Erasure**
- 5. Right of Disclosure or Access**
- 6. Right to opt-out of sale of information**
- 7. Children's Rights**
- 8. Right to not be discrimination for exercising rights**

Notice & Cookies

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WWW.ANDERSTOONS.COM



"Before I write my name on the board, I'll need to know how you're planning to use that data."

Say what you do,
do what you say





Digital Cookies Require Monitoring



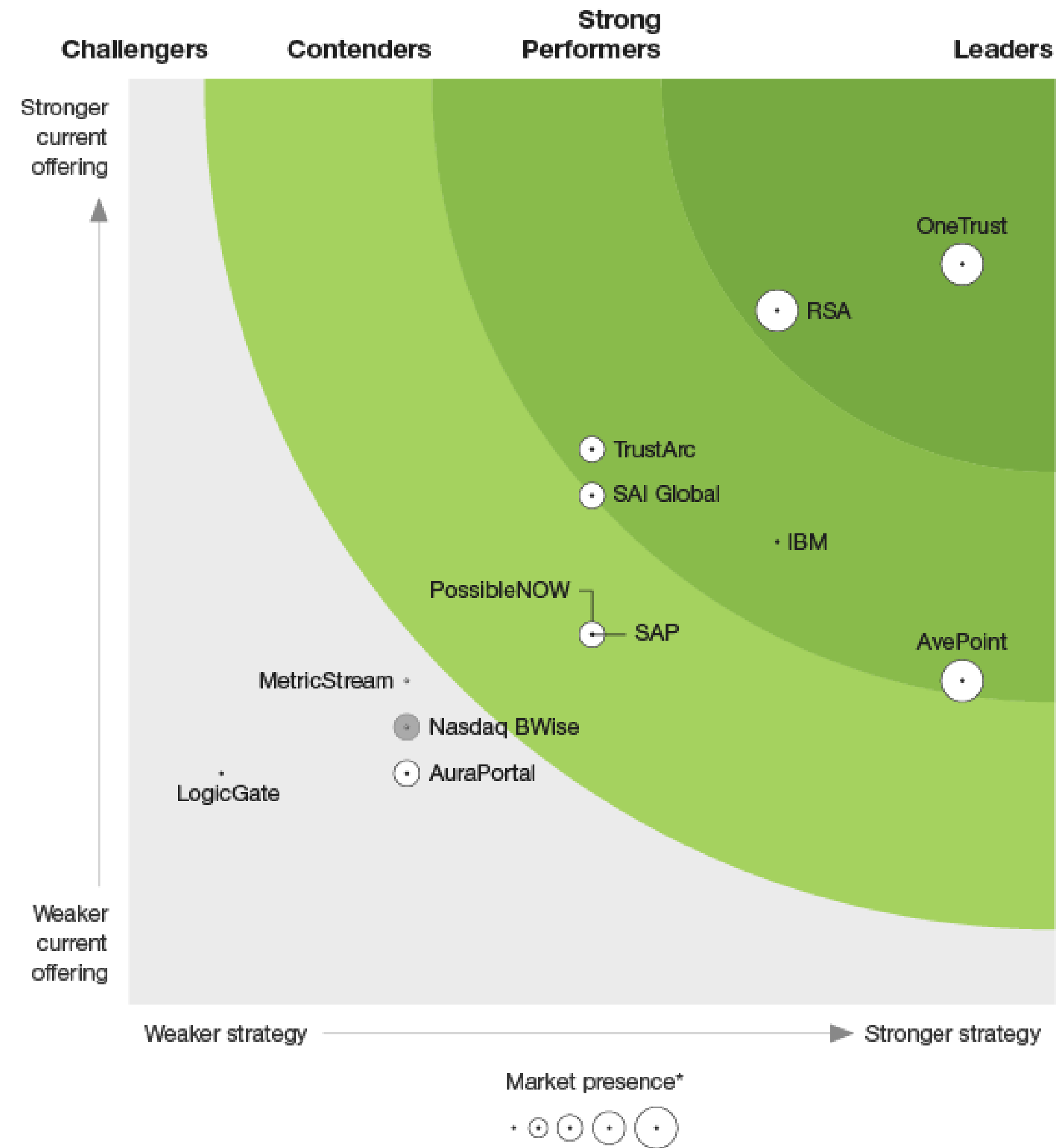
DIGITAL
ADVERTISING
ALLIANCE



Cookie Notices

- ▶ **Cookie banner should refer to policy**
- ▶ **Cookie lists need to be update to date**
- ▶ **Cookies should fire after consent received**
- ▶ **Users should be able to easily opt out**



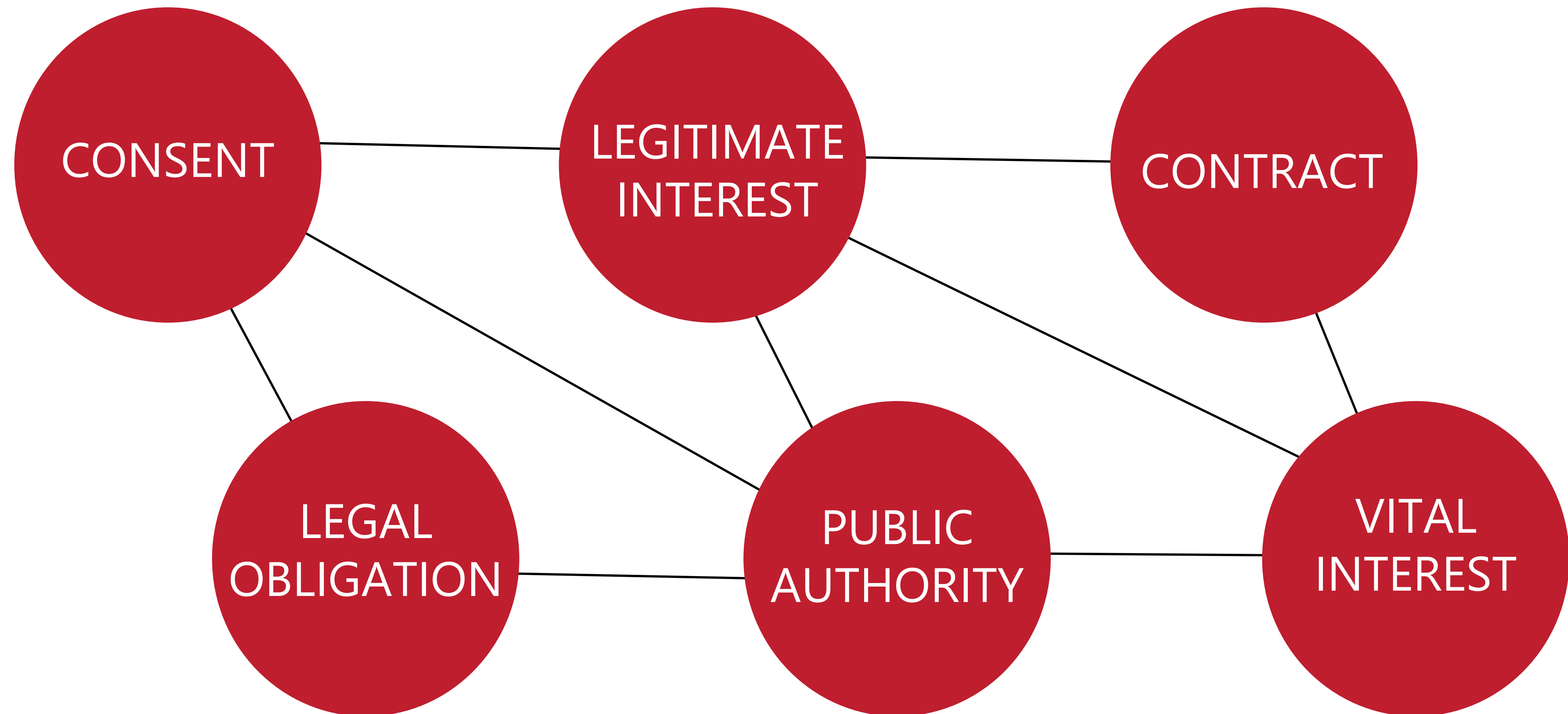


*Gray marker indicates incomplete vendor participation.

Digital Cookies Require Monitoring

Privacy Regulation: Marketing Impact

6 main legal grounds for processing personal data under GDPR





Bavarian cookie sweep

GDPR learnings to date

- Privacy information should be easy to find
- When relying on consent, no pre-ticked boxes can be used
- Individual *must* specifically consent to the purpose for which their data will be used. A catch- all indication of consent will not suffice
- The consent needs to be informed, specific, and affirmed
- Businesses of all sizes are impacted



Analytics and Privacy

“...prohibits sending personally identifiable information (PII) to Analytics (such as names, social security numbers, email addresses, or any similar data)”





How do I know?

Email Addresses

Primary Dimension: **Page** **Page Title** Content Grouping: none Other

Plot Rows Secondary dimension Sort Type: Default

@

	Page ?	Pageviews ?	Unique Pageviews ?	Avg. Time on Page ?	Entrances ?	Bounce Rate ?
		1,292 % of Total: 0.04% (3,159,818)	781 % of Total: 0.03% (2,467,980)	00:00:40 Avg for View: 00:01:39 (-59.75%)	315 % of Total: 0.02% (1,467,334)	26.90% Avg for View: 54.81% (-50.92%)
1.	/useraccount?email=emailAddress1@gmail.com	9 (0.70%)	2 (0.26%)	00:00:47	1 (0.32%)	0.00%
2.	/userAccount?email=emailAddress2@gmail.com	8 (0.62%)	2 (0.26%)	00:00:22	0 (0.00%)	0.00%
3.	/useraccount?email=emailAddress3@gmail.com	7 (0.54%)	1 (0.13%)	00:00:12	0 (0.00%)	0.00%

How do I know?

Common (American) Names

Primary Dimension: **Page** [Page Title](#) [Content Grouping: none](#) [Other](#)

Plot Rows Secondary dimension Sort Type: Default

`((im(my)?|ohn|ames)|rot` [advanced](#)

	Page ?	Pageviews ?	Unique Pageviews ?	Avg. Time on Page ?	Entrances ?	Bounce Rate ?
		9 % of Total: 0.00% (3,898,197)	9 % of Total: 0.00% (2,132,682)	00:00:17 Avg for View: 00:00:50 (-65.75%)	8 % of Total: 0.00% (620,112)	75.00% Avg for View: 34.51% (117.30%)
1.	/portal?firstname=mary&lastname=smith	5 (55.56%)	5 (55.56%)	00:00:17	4 (50.00%)	50.00%
2.	/account/info?name=chuck	4 (44.44%)	4 (44.44%)	00:00:00	4 (50.00%)	100.00%

`((im(my)?|ohn|ames)|robert|bob(by)?|michael|dav(id|e)|(d|r)ic(k|hard)|ch(arl(es|ie)|uck)|mary|pat(ty|ricia)|linda|barb(ara)?|e?liz(zy|abeth)|jenn?(ifer)?|mari(e|a)|su(e|san)|sarah?)`

How do I know?

Phone Numbers

Primary Dimension: **Page** **Page Title** **Other**

Plot Rows Secondary dimension Sort Type: Default

`((\+?1(\.|-|\s*)?)?\s*)(\d{3}(\.|-|\s*)?)\s*(\d{3}(\.|-|\s*)?)\s*(\d{4}\s*((x|ext)\.?(\s*\d*)?))` advanced

	Page ?	Pageviews ?	Unique Pageviews ?	Avg. Time on Page ?	Entrances ?	Bounce Rate ?
		117 % of Total: 0.01% (1,304,925)	84 % of Total: 0.01% (1,021,190)	00:01:23 Avg for View: 00:01:18 (6.90%)	3 % of Total: 0.00% (412,960)	25.00% Avg for View: 49.85% (-49.85%)
1.	/register/account?phone=867-5309	6 (5.13%)	1 (1.19%)	00:01:11	0 (0.00%)	0.00%
2.	/register/account?phone=1-900-487-8537	5 (4.27%)	1 (1.19%)	00:00:27	0 (0.00%)	0.00%
3.	/register/account?phone=1-900-649-2568	4 (3.42%)	4 (4.76%)	00:02:30	2 (66.67%)	33.33%

`((\+?1(\.|-|\s*)?)?\s*)(\d{3}(\.|-|\s*)?)\s*(\d{3}(\.|-|\s*)?)\s*(\d{4}\s*((x|ext)\.?(\s*\d*)?))`

How do I know?

Physical Addresses

Primary Dimension: **Page** **Page Title** **Other**

Plot Rows Secondary dimension Sort Type: Default

(street|st|road|rd|drive|dr) advanced

	Page ?	Pageviews ?	Unique Pageviews ?	Avg. Time on Page ?	Entrances ?	Bounce Rate ?
		3 % of Total: 100.00% (3)	3 % of Total: 100.00% (3)	00:00:00 Avg for View: 00:00:00 (0.00%)	3 % of Total: 100.00% (3)	100.00% Avg for View: 100.00% (0.00%)
<input type="checkbox"/>	1. /sign-in?road=penny-lane	1 (33.33%)	1 (33.33%)	00:00:00	1 (33.33%)	100.00%
<input type="checkbox"/>	2. /sign-in?road=4th-street	1 (33.33%)	1 (33.33%)	00:00:00	1 (33.33%)	100.00%

(street|st|road|rd|drive|dr|lane|ln|avenue|ave|boulevard|blvd|highway|hwy|township|twp|north|south|east|west)

How do I know?

Credit Card Numbers

Primary Dimension: [Page](#) [Page Title](#) [Other](#)

Plot Rows Secondary dimension Sort Type: Default

`\d{4}(-|\s*)?\d{4}(-|\s*)?` advanced

	Page ?	Pageviews ?	Unique Pageviews ?	Avg. Time on Page ?	Entrances ?	Bounce Rate ?
		19 % of Total: 100.00% (19)	17 % of Total: 100.00% (17)	00:01:56 Avg for View: 00:01:56 (0.00%)	6 % of Total: 100.00% (6)	16.67% Avg for View: 16.67% (0.00%)
1.	/payment?card=4444-4444-4444-4444	3 (15.79%)	3 (17.65%)	00:00:03	2 (33.33%)	100.00%
2.	/payment?card=1111222233334444	2 (10.53%)	2 (11.76%)	00:00:05	0 (0.00%)	0.00%

`\d{4}(-|\s*)?\d{4}(-|\s*)?\d{4}(-|\s*)?(\d{4})?`

How do I delete?

Search reports and help

HOME

CUSTOMIZATION

Reports

REAL-TIME

AUDIENCE

Overview

Active Users

Lifetime Value BETA

Cohort Analysis BETA

Audiences NEW

User Explorer

Demographics

Interests

Geo

Behavior

Technology

Mobile

Custom

DISCOVER

ADMIN

User Report

May 1, 2017 - Jun 6, 2018

Client Id ?
34d6b504-64e4-43d7-b441-e8ab6b9271c9

BigQuery Client ID ?
686385807634692432

Date Last Seen ?

Device Category ?
desktop

Device Platform ?
web

Acquisition
Date ?
May 12, 2017

Channel ?
Organic Search

Source / Medium ?
(not set)

Campaign ?
(not set)

Return to User Explorer Report

Delete User

Sessions (LTV) ?
0
Sessions (Current): 1

Session Duration (LTV) ?
00:00:00
Session Duration (Current): 00:00:00

Revenue (LTV) ?
\$0.00
Revenue (Current): \$0.00

Transactions (LTV) ?
0
Transactions (Current): 0

Goal Completions (LTV) ?
0
Goal Completions (Current): 0

Goal Value (LTV) ?
\$0.00
Goal Value (Current): \$0.00

Goal 1 (Go
0 >
Goal 1 (Go

Create Segment

Filter by
4 selected

Sort by
Descending

Expand All

Collapse All

Export

May 12, 2017

1 session

1:34 AM

00:00

Organic Search

1

Show rows: 100 Go to: 1 1 - 1 of 1

This report was generated on 6/7/18 at 11:21:41 AM - Refresh Report



Accounts%20-%20Export%20to%20Excel[1].xls - Excel

FILE HOME INSERT PAGE LAYOUT FORMULAS DATA REVIEW VIEW Load Test POWERPIVOT Team

Cut Copy Paste Format Painter

Arial 10 A A

B I U

Wrap Text

General

Conditional Formatting Table

Normal Bad Good Neutral Calculation Check Cell

Insert Delete

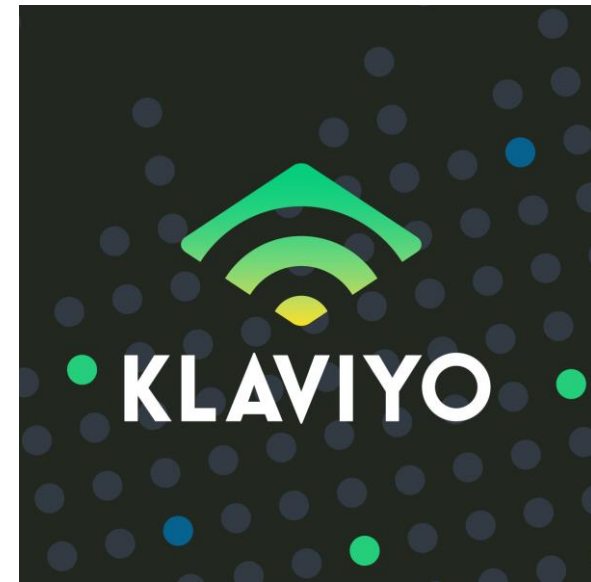
Clipboard Font Alignment Styles Cells

A1

Client Name

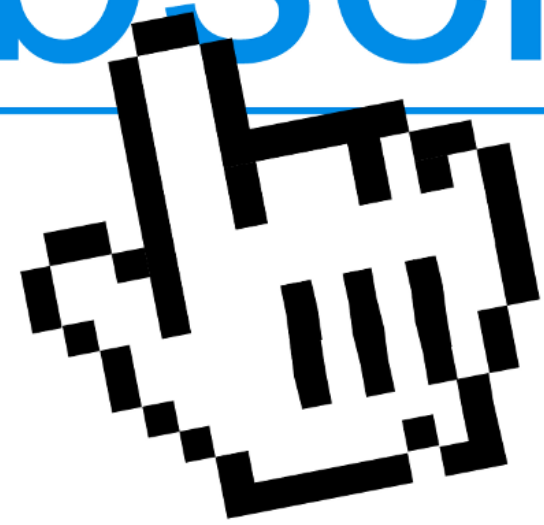
	A	B	C	D	E	F	G	H	I	J
	Client Name	Relationship Type	Industry	Primary	Address	City	State/Provin	ZIP/Postal C		
2	A Sales Store	Customer	Enterta			Gurgaon	Gurgaon	122002		
3	Active Marketing	Customer	Ente	Active Ma	Centro Leton	Caracas				
4	Advanced Sales Components	Prospect	Sp	Advanced	Level 5/22 Viaduct	Auckland	Auckland	1010		
5	Affordable Sports Equipment	Customer	F	Affordable	55 Nikola Vaptsarov B	Sofia		1407		
6	Amazing Sales	Prospect		Amazing	9020 Stony Point Pkwy	Richmond	VA	23235		
7	Amazing Sports Store	Prospect		Amazing	9020 Stony Point Pkwy	Richmond	VA	23235		
8	Another Service Company	Prospect		Another	9020 Stony Point Pkwy	Richmond	VA	23235		
9	Astonishing Sales	Customer		Astonishing	9020 Stony Point Pkwy	Richmond	VA	23235		
10	Basic Sales Company	Customer		Basic	9020 Stony Point Pkwy	Richmond	VA	23235		
11	Best o' Sales	Customer		Best o'	9020 Stony Point Pkwy	Richmond	VA	23235		
12	Bold Sales Accessories	Customer		Bold	9020 Stony Point Pkwy	Richmond	VA	23235		
13	Breathtaking Sporting Goods	Prospect		Breathtaking	9020 Stony Point Pkwy	Richmond	VA	23235		
14	Brown Service Company	Customer		Brown	9020 Stony Point Pkwy	Richmond	VA	23235		
15	Cash and Carry Sales	Customer		Cash and	9020 Stony Point Pkwy	Richmond	VA	23235		
16	Cheap n Best Sales	Prospect		Cheap n	9020 Stony Point Pkwy	Richmond	VA	23235		
17	Coalition Sales Company	Customer		Coalition	9020 Stony Point Pkwy	Richmond	VA	23235		
18	Contoso	Partner		Contoso	9020 Stony Point Pkwy	Richmond	VA	23235		
19	Cool Ride Store	Prospect		Cool Ride	9020 Stony Point Pkwy	Richmond	VA	23235		
20	Daring Rides	Prospect		Daring	9020 Stony Point Pkwy	Richmond	VA	23235		
21	Designer Sales	Prospect		Designer	9020 Stony Point Pkwy	Richmond	VA	23235		
22	Discount Service Specialists	Prospect		Discount	9020 Stony Point Pkwy	Richmond	VA	23235		
23	Distribution Incorporated	Prospect		Distribution	9020 Stony Point Pkwy	Richmond	VA	23235		
24	Driving Sales	Prospect		Driving	9020 Stony Point Pkwy	Richmond	VA	23235		
25	Economy Sales Company	Customer		Economy	9020 Stony Point Pkwy	Richmond	VA	23235		
26	Eleventh Sales Store	Customer		Eleventh	9020 Stony Point Pkwy	Richmond	VA	23235		
27	Ever Lasting Sales	Customer		Ever Lasting	9020 Stony Point Pkwy	Richmond	VA	23235		
28	Ever Winning Sales	Prospect		Ever Winning	9020 Stony Point Pkwy	Richmond	VA	23235		
29	Exemplary Marketings	Prospect		Exemplary	9020 Stony Point Pkwy	Richmond	VA	23235		
30	Fabrikam	Partner		Fabrikam	9020 Stony Point Pkwy	Richmond	VA	23235		
31	Fantastic Sales	Customer		Fantastic	9020 Stony Point Pkwy	Richmond	VA	23235		
32	Fast and Fun Sales	Customer		Fast and	9020 Stony Point Pkwy	Richmond	VA	23235		
33	Fifth Sales Store	Prospect		Fifth	9020 Stony Point Pkwy	Richmond	VA	23235		

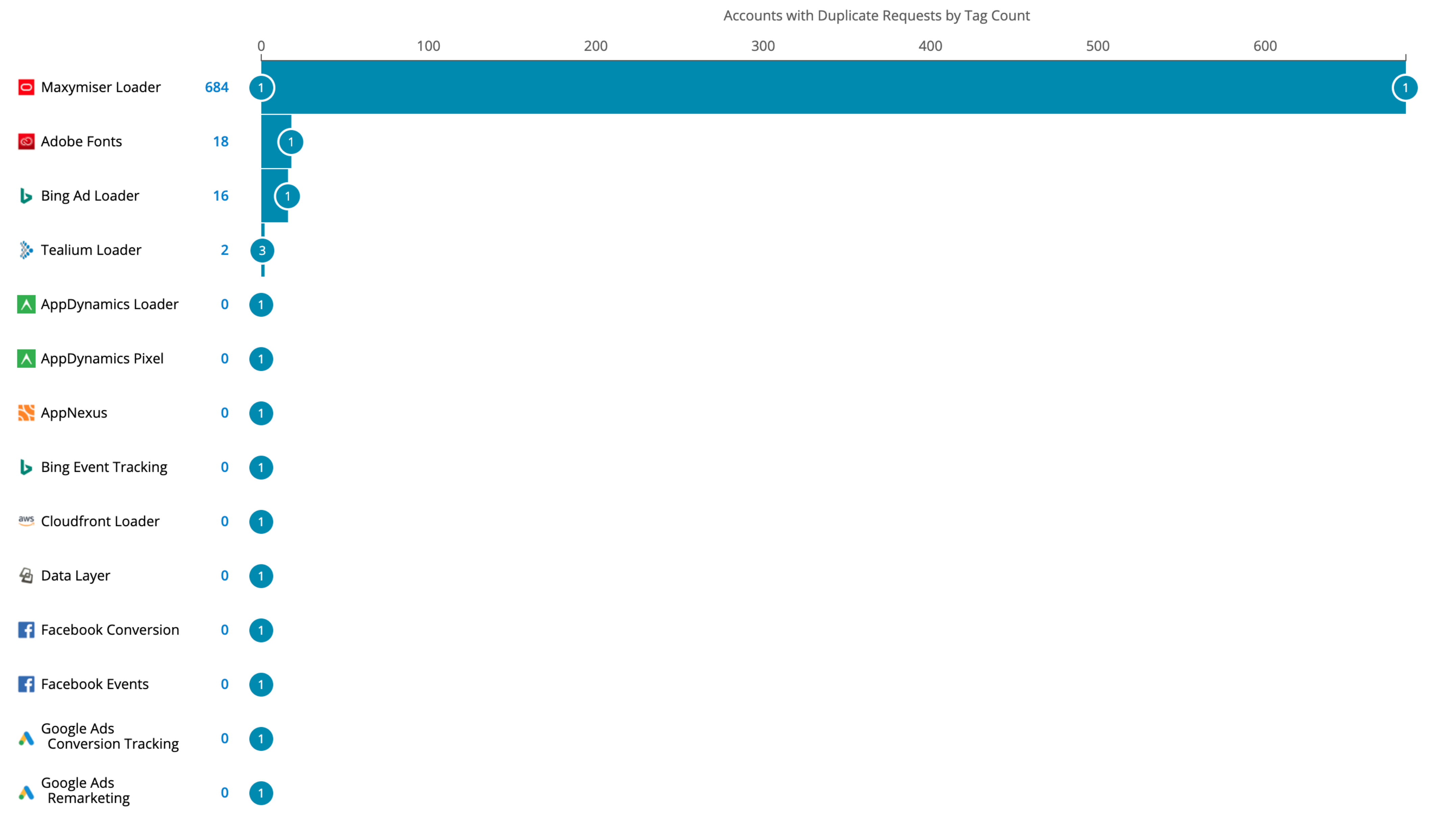
Accounts - Export to Excel



ORACLE®
Bronto

Unsubscribe





NEWS IN BRIEF

‘Join Email List’ Box Pre-Checked Like Sneaky, Conniving ██████████ It Is

8/13/18 2:10pm • SEE MORE: INTERNET ▾



EMAIL*

CONFIRM PURCHASE



Join Email List

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Tip: [Log in](#) to your account to avoid repeating this across your devices.

How data brings you better experiences

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Select OK to continue to your destination, or Manage options to manage your data settings.

Manage options

OK

< Our Partners

It takes teamwork to bring you the best experiences with our brands. We may provide information to our trusted partners to help them provide you more relevant experiences and ads, and understand your interactions with them.

See and customize **how** partners can use your data. [Hide](#)

Information storage and access	?	<input type="checkbox"/>
Ad selection, delivery, reporting	?	<input type="checkbox"/>
Measurement	?	<input type="checkbox"/>
Personalisation	?	<input type="checkbox"/>
Content selection, delivery, reporting	?	<input type="checkbox"/>

See and customize **which** partners can use your data. [Hide](#)

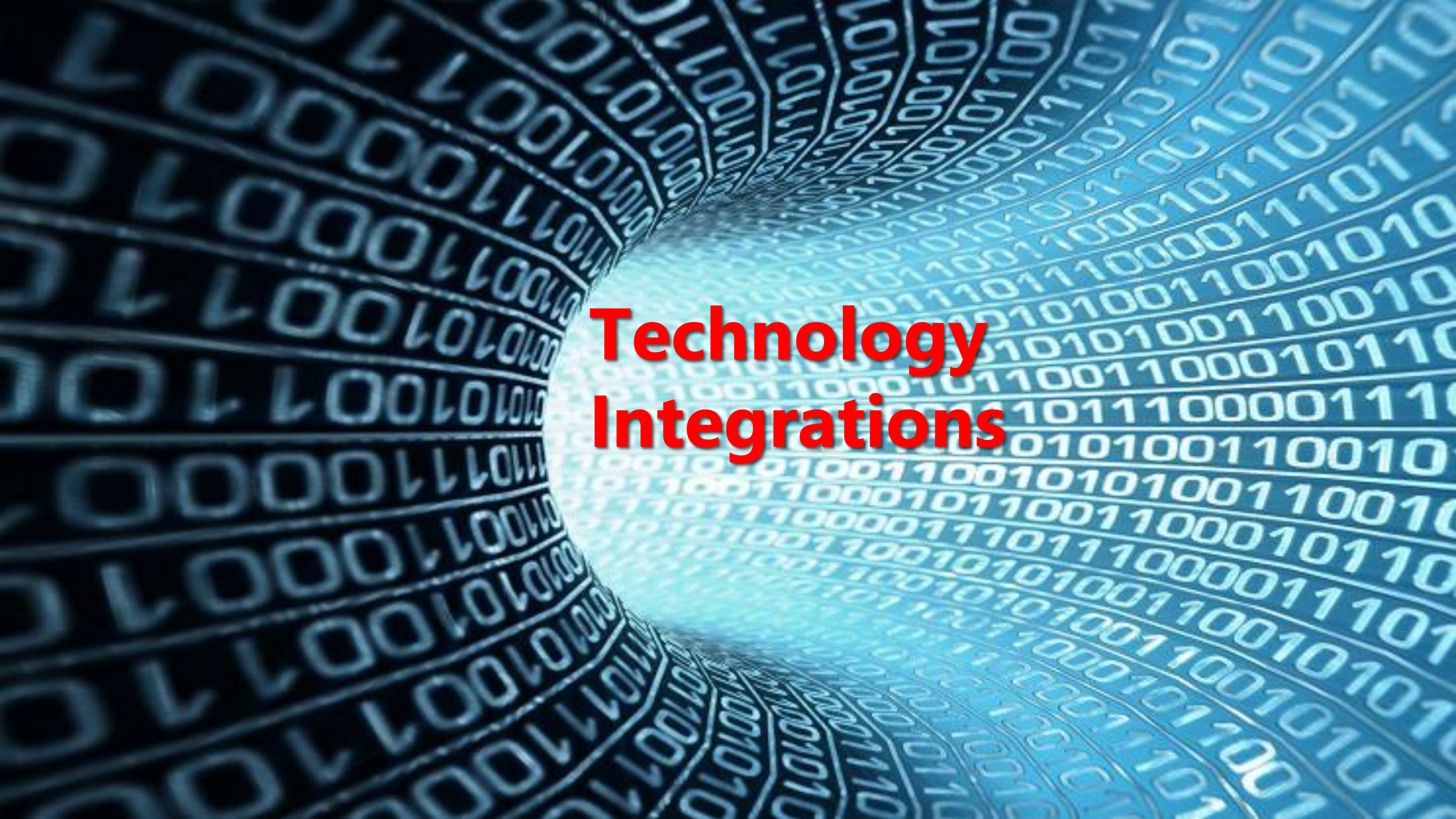
AdSupply		<input type="checkbox"/>
ad4mat		<input type="checkbox"/>
One Person Health, Inc. (DBA Adacado)		<input type="checkbox"/>
ADARA MEDIA UNLIMITED		<input type="checkbox"/>
AdBlade		<input type="checkbox"/>
AdButler		<input type="checkbox"/>
AdCentric		<input type="checkbox"/>
AdClear		<input type="checkbox"/>
Add2 Avolution		<input type="checkbox"/>
Addroid		<input type="checkbox"/>
AddThis		<input type="checkbox"/>

Adelphic		<input type="checkbox"/>
Adform A/S		<input type="checkbox"/>
AdGear (Bloom)		<input type="checkbox"/>
Adimo		<input type="checkbox"/>
Adinfinity (Viziads)		<input type="checkbox"/>
ADITION technologies AG		<input type="checkbox"/>
Adjust		<input type="checkbox"/>
Adledge		<input type="checkbox"/>
Adloox SA		<input type="checkbox"/>
Adman		<input type="checkbox"/>
admetrics GmbH		<input type="checkbox"/>
Admotion SRL		<input type="checkbox"/>
Adobe		<input type="checkbox"/>
Adrime (now Weborama)		<input type="checkbox"/>
AdRoll Inc		<input type="checkbox"/>
AdSpirit GmbH		<input type="checkbox"/>
AdTriba		<input type="checkbox"/>
...		

A sustainable privacy program

A group of five business professionals are seated around a white table in a modern office setting. From left to right: a woman with blonde hair in a grey blazer, a man with a beard in a dark suit, a woman with red hair in a grey blazer (seen from behind), a woman with red hair and glasses in a dark blazer, and a man in a dark suit and tie. They are all looking towards the center of the table. A red banner with white text is overlaid on the image.

Who likes vendor vetting?



Technology Integrations



Privacy Impact Assessment



**Employees are the
strongest and
weakest link!**

TRUST IS

The Basis

Of Privacy





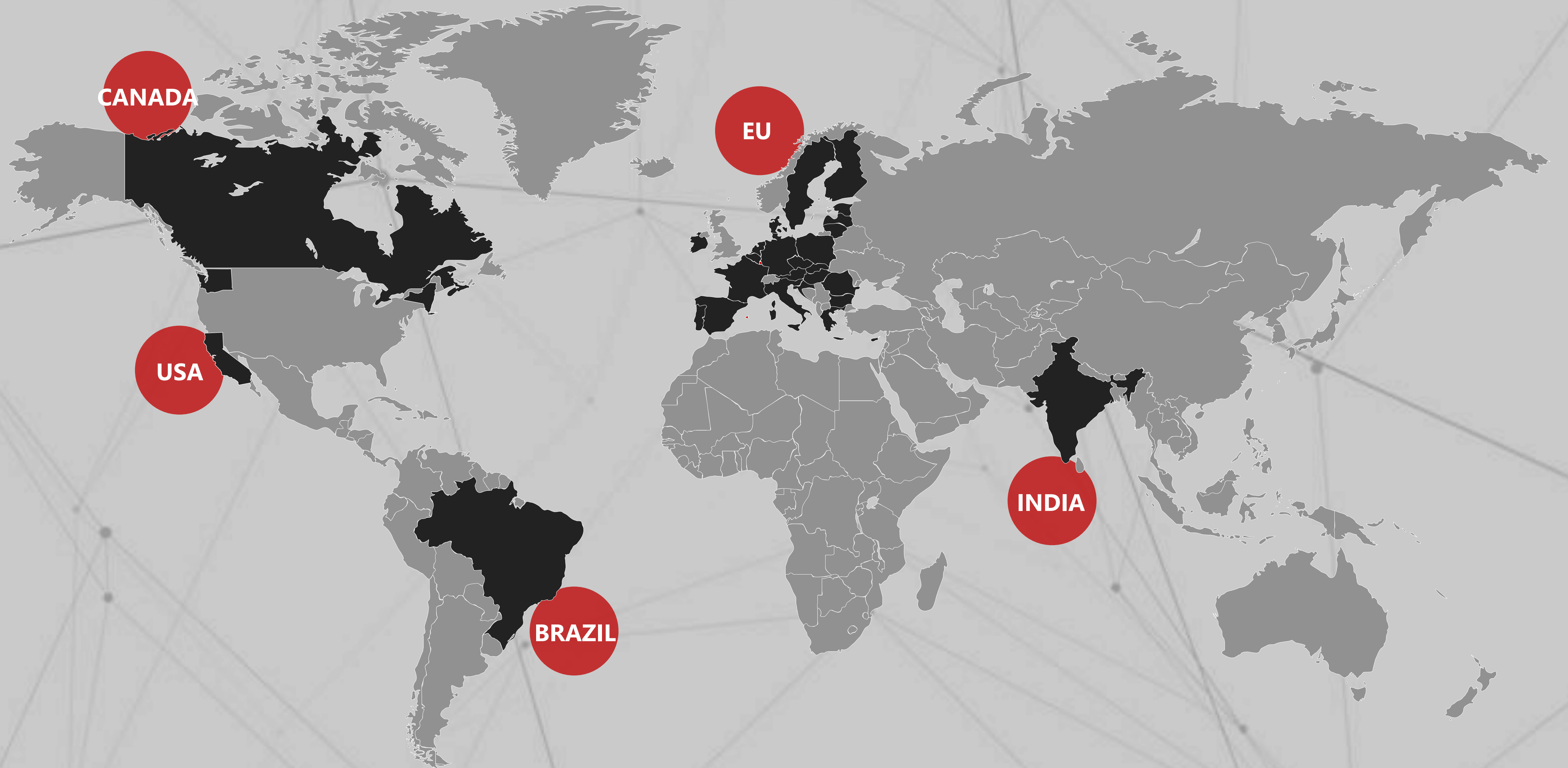
Compliance With These Laws Must Be An **ONGOING** Proposition

Privacy by
Design is not
a one-time
activity

Will the future hold more regulation?



Data Transparency Facts	
Data Distributor Name: Data Company Data Distributor Contact: DataSolutionTeam@data.com Data Provider Name: Leasing Company Data Provider Contact: DataAccounts@leasingco.com	
Audience Snapshot	
Branded Name	Auto Intenders – Six Months
Standard Name	Auto Intenders
Audience Description Households likely in the market to purchase a new vehicle in the next six months	
Geographies	USA
Audience Construction	
Audience Count	6,500,000
Precision Level	Households
Activation ID(s)	Cookies
Audience Expansion	Yes
Cross-Device Expansion	Yes
Last Refresh Date	02-Jan-2018
Event Lookback Window	60 Days
Data Source	
Source ID Description Dealer-reported names and postal codes of individuals who requested test drives	
Source ID Contribution	1,130,000
Precision Level	Individual
ID Kcy	Name and Postal
Source Event	Transactions
Inclusion Method	Observed
Seed Size (if modeled)	-
Source Refresh Frequency	Quarterly
Event Lookback Window	180 Days
This Data Transparency Label has been developed by members of ANA's Council for Data Integrity and IAB Tech Lab's Data Transparency Working Group, with the support of CIMM, The ARF and IAB's Data Center of Excellence. For more information, please visit datalabel.org .	



CANADA

EU

USA

INDIA

BRAZIL

Action steps

If you complied with GDPR, it's a first step for CCPA but not 100% done

Data inventory is necessary to know what and why you collect, use, share, store, and sell

Individual rights process and plan

Pixel governance strategy & tag audit

Review your marketing vendors including contracts for compliance

Create or update your internal policies and procedures

What resources (tools, consultants, attorneys) are needed to comply today and maintain ongoing compliance?



1. Check your analytics tool for PII


2. Stop sending CRM lists

3. REALLY unsubscribe your unsubscribes

4. Don't be a sneaky, conniving \$&!*@^ with pre-checked boxes

QUESTIONS?





Get in touch

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