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GDPR – A handbook for digital marketer

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Bachelor's thesis
Degree programme of Business Administration
2017

Abstract

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Degree Programme
Business Administration, Advertising and business communications

Title of thesis
GDPR – A handbook for digital marketer

Number of pages and appendices
43 + 21

In May 25th, 2018 the legislation of utilizing personal data in the European Union changes for good. That is the date when Regulation (EU) 2016/679 more familiarly known as General Data Protection Regulation takes into application. One of the most significant fields that is resorting to and benefiting from the use of personal data has been digital marketing and especially digital advertising. This thesis' purpose is to find out what the application of the GDPR means for the industry and create an easily approachable product for day-to-day use for an individual person working on or studying the field of digital marketing.

The thesis was conducted throughout the year 2017 whilst the author was simultaneously working for a large media agency group as a programmatic campaign manager. The experience from working in digital marketing is reflected on the thesis and evaluation of what parts of the GDPR are the most relevant for digital marketers. Main methodologies used were background research and analysing of both the GDPR and the current state of digital marketing. The products content was evaluated by a few superiors and a business associate of the author.

The product of the thesis is a handbook for digital marketers. It serves two main goals. It's as relevant as possible from the digital marketing point of view and easy to understand without prior knowledge of the regulation. Going through too many details and scenarios wouldn't have served the purpose of the handbook. After reading the handbook one can grasp the key topics of the regulation and identify the pressure points of it in their own organizations and their ways of working. The audience of the handbook are people working for advertisers, agencies and publishers alike. The audience is not supposed to be lawyers and decision makers of these companies which is an important distinction to make. Anyone who makes decisions in their organizations regarding personal data should get to know the actual regulation from cover to cover.

Structure of the thesis consists of three parts. The theory background covers what digital marketing is and how data is being utilized in it. Empiric part is analysis of the GDPR and arguing what parts of it are covered in the handbook and why. The conclusions chapter finalizes the thesis with assessment of the creating process of it.

Keywords
Digital marketing, digital advertising, programmatic buying, personal data, GDPR

Table of contents

1 Introduction

27.4.2016 marked the date when the European Parliament signed regulation number 679/2016. This regulation was to be known as the General Data Protection Regulation and it would bring rules to the wild west that is internet privacy in the 21st century world. The GDPR, as it is referred in short, was in the making for years and saw thousands of proposed amendments to it. In the end, even though the most radical suggested points of regulation were discarded, what came to be was a legal behemoth. The penalties would be made strict enough to put everyone who would break this regulation to their knees. 20 million euros or 4% in annual revenue, whichever is greater, is a penalty that would shock any organization. In fact, the regulation would be so significant that the EU gave the member states and the companies working inside them 2 years to prepare. The end of this two years is closing. In May 25th, 2018 the GDPR will become applicable in the entire Union as it is (Calder 2016, 1-8.)

Digital marketing is a field that is one of the biggest utilizers of personal data. Marketers at the moment have a serious crush on marketing and advertising tech. The most easily sellable and shallowly understandable parts of the tech is data. People generally has accepted the idea that everything they do online is being tracked. This has been the accepted reality that's been established especially after former NSA agent Edwards Snowden's leaks about how broad and advanced the spying of the US government has been for a long time. For marketers it means that the data that anyway is being collected in such vast amounts, will help them reaching their ultimate business communicational goal. Reach the right person in the right place at the right time with the right message. How exciting is it that instead of traditional mass-media thinking, where message is being shout out to as many people as possible fingers crossed that some of them gets engaged, you can now hand-pick the exact right person to reach and show them a customized message. Truly a marketing daydream. However, that all comes with a dark cloud above it and that is the infringements of personal privacy.

Today, people rarely even know what data they are wilfully giving away on the internet. Mark your birthday in Facebook and you have stated your age for ad targeting use. Visit a car manufacturers website and you're labelled as both interested in cars and in this specific car brand. It is not only advertising either. iRobot, a company that sells their popular robotic vacuum cleaner Roomba, admitted that their high-end vacuum cleaners are mapping the area they are cleaning all the time. Meaning that eventually, when the Roomba has enough data, the company knows the floor plan of your house. Highly valuable information for example to the house robbers of the information age (Astor 2017.) The EU

acknowledged that all of this is risking its peoples' civil rights a little too much and decided to act. What is known is that the GDPR will change how data is being used in marketing. How will it change in practice; no one can see in the future and know that. However, this thesis will take the current state of data usage in digital marketing and reflect that on the details of the new regulation. Researching what are the key points from the marketing point of view, that need to be considered when operating under the GDPR.

The type of this thesis is a product. A handbook, that anyone interested in digital marketing and the effects of the GDPR has on it, could grab and easily familiarize with the topic. Anyone could at least point what to consider regarding the regulation and what is it about. The author is working in a global media agency group and has bumped into a severe lack of knowledge about the GDPR in the field. Himself included. All the while it will be in application in the spring of 2018. This proved that there seems to be a large demand for a study like this thesis which clears out the details of this grand regulation. No organization or an individual, at least from a professional perspective, probably want's more regulation. However, the rules must be followed by anyone and everyone who they apply.

The goal of the thesis is to cover up the lack of knowledge about the GDPR in the digital marketing industry. The GDPR is a huge regulation. It has been told to have a great effect on digital advertising. What will that effect be is more unclear. The goal of this thesis is to find out exactly what are the major changes the GDPR brings to digital marketing. Any professional or student in the field who don't know anything about the GDPR can pick up the handbook and get familiar with the regulation. Creation of the GDPR handbook is done with the intent that reading it doesn't require any prior knowledge about the subject. The look and format of the handbook will be made to incentivise interaction such as taking notes and making markings.

First this thesis looks on what digital marketing today is, and what are the different uses of it. How the applications it is used today are based on the same principles that were used in marketing over 100 years ago. Next, the paper moves onto what several ways digital marketing is being done and what are the types of it. What kind of channels work with different objectives and situations. The theoretical part will be wrapped up by the topic of data. Data is used exhaustively in digital marketing and its use will be considerably regulated with the GDPR. To give an overall understanding how data is being used the thesis covers several ways of data use and the ever-present issue of privacy that comes with the use of data. After introducing digital marketing and data usage, the paper dives into the research of the GDPR. The creation and the contents of the GDPR handbook product are thoroughly covered. An explanation is given of what was picked to be covered on the

handbook and what was left out. As well as why each design choice were made as they were. Conclusions about the research and the thesis will finalize the paper.

2 Digital marketing

The pace of how fast digitalization has happened in the world is phenomenal. Personal computers were introduced in the late 70's but really popularized in the 80's. The World Wide Web and the first internet browsers were invented as late as 1990. Only few decades later our media consumption is now completely dominated by digital. And more powerful devices with internet access than those first PC's in the early PC era are found in all our pockets.

In 2016, 98% of Finns had a mobile phone and 95% were internet users. That is over twice the amount of magazine readers for example (eMarketer 2017a). It is crucial for any marketer to know how to utilize this.

From the year 2011, advertisers' spending on digital media has been growing between 6.8% and even 10.8%. In the year 2017 the share of digital ad spend out of total ad spend in Finland will be almost 30%. (eMarketer 2017b)

2.1 AIDA-model online

Marketing and advertising has been based on the same basic principal for over 100 years. The principal is called the AIDA-model. The acronym derives from the similarly named opera and was founded, depending on the source, between late 1890's and 1920's. AIDA stands for Attention, Interest, Desire and Action. (Lindberg 2016, 115-117) This represents the different objectives advertising has.

Attention to gain the attention of the consumer
Interest to awake the consumers interest towards the product. The customer is not interest in the product as of first, but how the problem they are trying to solve with the product.
Desire to make the customer feel that the product will solve their problem and fill their need. Make the customer want to have the product.
Action to make the customer act on the desire. For example, buy the product or sign the contract. (Lindberg 2016, 115-117)

AIDA also serves as the base of sales funnel, which is another principle for advertising, marketing and sales. Attention is awakened for a large audience. Some of that audience's attention is gotten and some not. The group which attention was successfully claimed need then to get interested of the product. To make them consider the product as an option to solve their problem or fill their need. Again, some of the audience's interest is not

able to be gotten and that part of the audience is lost. The rest get interested and they need to be taken “further down the funnel”. Desire to buy the product should be activated. This again requires a different approach on advertising and marketing. The audience needs to engage with the brand. After the inciting desire, the audience must be turned into customers by actioning. Advertising in this part needs to be precise and call to closure or action. This process is called a funnel because each step some of the audience is lost and narrowed down (Charlesworth 2014,25-70.)

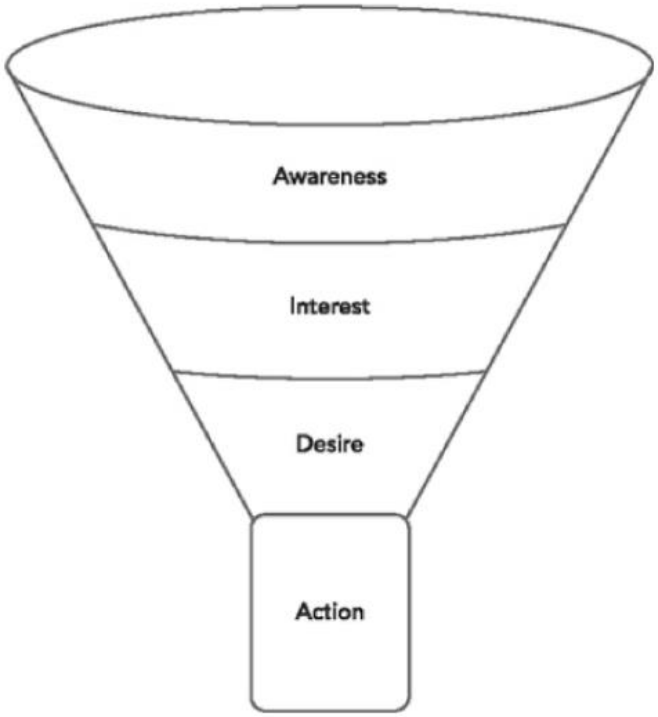

Image 1 The basic AIDA sales funnel (Charlesworth 2014,25-70.)

Over the years the AIDA model has been modified a little. Additional acronyms have been added for example E for Experience or S for Satisfaction. The basic principal still remains the same. (Lindberg 2016, 115-117) Customer acquisition is a process which takes several steps with different objectives along the way. Depending on the objective, the message and the targeting of the ad needs to be altered.

The AIDA model will be used on the following chapter to explain how different types of online marketing is used per objective.

A successful marketing campaign always needs an objective and a metric to measure the success as opposed to this objective. In online marketing this metric is called a key performance indicator or KPI for short. KPI's can be numerous and how individual marketing campaign is best measured is up to the marketer to decide. (Ryan 2014, 84-85.)

KPI's are always derived from the business objectives. They are something concrete of which the success of a digital marketing campaigns performance can be evaluated against. Everyone in the organization should understand what a role of the KPI is. KPI is always a metric but metric is not always a KPI. KPI's are metrics that tell how effective a marketing campaign has been. All metrics aren't supposed to serve this purpose. For example the relevance of clicks in an advertising campaign needs to be thought out whether or not that particular metric is always relevant (Ryan 2014, 84-85.) Next will be presented a few examples of KPI's from different parts of the AIDA sales funnel.

Conversion rate. A predefined action performed by the user in the marketers site is called a conversion. Conversion can be for example a purchase, filling of a form or downloading of coupon file. Conversion rate is calculated by dividing the conversion by the total audience. For example, in programmatic buying, conversions divided by impressions (Ryan 2014, 84-87.) Conversion rate is a tactical KPI and its role in the AIDA sales funnel is usually on the bottom A, action.

Shares in social media. Social media focuses on content and users interacting with that content and each other. Sharing is a part of many social media channels and for example Facebook campaigns can be evaluated by how much people share the brands content. (Ryan 2014, 84-87, 153-177.) Sharing is essentially engaging with the brand. It shows that the user has already noticed the brand and is interacting with it. That's why shares in social media KPI will land in the interest and desire parts of the sales funnel.

Viewability rate. Not all ads in the online environment are seen by actual users. Whether the ad was on screen while the user was scrolling a page or not is called viewability. A view is counted when 50% the ads pixels has appered on the screen for more than 1 second. This standard is set globally by the Media Rating Council (MRC) and can be measured using technology (Bounie, Morrisson & Quinn 2017, 1-9) Viewability can be used as a KPI when the goal is to reach people's awareness of the brand. This makes its positioned in the upper part of the AIDA marketing funnel.

2.2 Search engine marketing

Search engine marketing means marketing where the marketer wants to be visible on search engines' search results. It is very special kind of marketing because it is very different from traditional mass-marketing. The customer is able to be reached in the moment they are looking for a solution to a problem or searching for information. (Larvanko 2009, 91-100.) This means that it places on the last A of the AIDA acronym and heavily on the performance end of the online objectives funnel. Google has clear market leadership in search engine marketing in Europe. In October 2017 Googles market share in search engines was 92.01% (Stat Counter 2017.)

Roughly, search engine marketing can be divided into two ways. Search engine advertising and search engine optimization. Search engine advertising means paid search ads on the top, bottom and sides of the search results. The ads are sold and bought in a second price based auction. The advertisers specify what kind of searches they want to be seen in and lay down what they want to bid in these auctions. The bid multiplied with the quality score Google have given to the site linking from the ad determines whether the ad is the top result, some other result or isn't shown at all. The price the winner needs to pay is the second highest bid plus one cent (Park 11.8.2017.) Targeting can be done just for the keywords which isn't personal data. But in addition, behavioural targeting can be added based on the search engine providers data gathered form the users.

Search engine optimization or SEO for short, is manipulating the site to appear in organic search results. This is done for example by analysing the keywords people search in the search engine and applying those words on the site. SEO is great for reaching the customers at the moment they are looking for information (Larvanko 2009, 91-100.) Optimization does not require any media spend to be used but since the searches are getting more and more competitive, it takes a lot of working hours.

2.3 Social media

Social media means online based services that rely on users discussing, interacting and communicating with each other. Creating and sharing content is a big part of most social media platforms. Things shared can be videos, movies, texts or memes for example. Practically anything that can be shared online is shared through social media (Ryan 2014, 153-177.)

Social platforms are immense part of people's digital media usage at the moment. Amazon owned Alexa keeps track of most popular websites in each country. From the top 50

sites list in Finland, 20 sites can be categorized as social media (Alexa 2017.) And this doesn't even take mobile apps into consideration, which are growing even more and more popular by the day.

Varieties of social media are plenty. First association when hearing the word social media is usually social networks such as Facebook or Snapchat. However, many other types of sites and apps are also social media. These can be submission sites like Reddit, media sharing sites such as Youtube, blogs, wikis or reviewing websites. The range is huge and marketing in these channels can be very polymorphous (Ryan 2014, 153-177.) Most notable is still marketing happening in the biggest ones which are Facebook, Youtube, Instagram, Twitter and Snapchat.

Paid advertising is one way for social media marketing. Most of the biggest social media platforms listed before have their own self-service advertising platforms. From these platforms advertisers or agencies can buy advertising in that specific environment without the need for contacting the sites representatives. Same rules as for any paid advertising are present in social media advertising. Ads need to be stated as ads without misleading the consumers. Social platforms that have extensive user-base have also uniquely good access to data. For example, Facebook users give a lot of personal information to the platform voluntarily. 2 billion users share age, gender, location and personal interests every day in Facebook. All this data, Facebook has harnessed for ad targeting to be used by its advertiser clients (Facebook 2017.)

What makes social media a special media type is that marketing capabilities doesn't limit to paid advertising. Companies can access the social media communities as equal contributors to the consumer-users. They can create, share, communicate and interact with their customers. Customer support and reviewing channels can be created in social media thus bringing them closer to the consumers (Ryan 2014, 153-177.) Organic social media activity at its best can really drive customers brand engagement and desire for the product of the marketer. Brands have become much more easily accessible and closer to the customers. Still, as with any communication there lies big risks in social media marketing. Jokes are misunderstood, undisclosed documents are mistakenly shared and individual communicators cross the line of good taste. All done in the name of the brand. That's why a clear social media strategy needs to be in place and the communicating in the platforms need to be done by professionals (Ryan 2014, 153-177.)

2.4 Programmatic advertising

Programmatic advertising or, programmatic buying, is a term for media buys that are automated or done by machines. This is still mainly display banner and video ads, but other types of media are developing to programmatic ways all the time. Therefore, all the parties of media are making huge investments in programmatic. It equals efficiency since more and more sophisticated it gets, less and less man hours are needed to uphold the sales and buying channels (Nesamoney 2015, 63-66.)

Programmatic advertising is divided into two sides. Supply side and demand side. Supply side is represented by medias, publishers, ad networks and individual creators such as bloggers and vloggers. Demand side consists of advertisers and the agencies that buy on the behalf of those advertisers. Both sides have different interests and ways of benefiting from programmatic advertising. For publishers the main attraction is to monetize their content as efficient as possible. Machines allocate media buys automatically keeping the publishers' best interest in mind. Prices can also be optimized. The seller on the supply side is in no way attached to any price and is free to value their inventory as they please. For advertisers the main benefits of programmatic buying are the ability to target it very accurately and optimize based on desired results. Advertiser sets an objective for its programmatic campaign, decides which KPI's it measures to evaluate the campaign and buys according to which supply gives the best results. The advertiser is not obliged to buy any more than necessary from single source whereas in traditional contract based buying, it needs to fill the contract made with a publisher (IAB 2017.)

Buys in programmatic are executed via demand side platforms and supply side platforms. DSP's and SSP's. These are technologies created by ad tech companies for buying and selling programmatically. An advertiser sets the DSP to buy ad inventory according to their needs. They appoint the targeting of the ads, the banners or videos they want to use, the timing, budget, dayparting, frequency etc. They determine how much are they ready to pay for the advertising and what and how they bid on the open auction. Finally, they establish their KPI's and follow their performance in real time as the campaign goes on (IAB 2017.)

The publishers on the SSP-side have set how they want to sell. This is for example what kind of ad placements they have on each site. How are they priced and if some buyers are preferred more than others. They can determine what data is passed to the DSP's and if

this data is given for their targeting. SSP also makes sure it is technologically easy for the DSP's and the buyers to buy from the publisher (IAB 2017.)

Open auction or RTB is one way and the most notable way of how buys are executed in programmatic. In each placement in each time a site is loaded, happens an auction in real time. This auction only takes a fraction of a second but a lot is happening during that time. (IAB 2017.) Here is explained step by step how an RTB auction happens: A user enters a site. The site profiles the user as a woman aged 25-44 who is interested in fashion. The SSP passes this information to the DSP's. The DSP's, depending if they are looking to show ads to someone of this profile, decide whether to bid in the auction or not. Some DSP's don't bid at all for example if they are looking for men or older women. The DSP's that decide to participate in the auction then bids according to how they evaluate the whole situation. The situation being that the auction is happening in this particular publishers' this particular ad placement and the users profile is exactly this. The DSP's place their bids and the highest bid wins. The SSP then allows the DSP to serve its ad and the user views the ad.

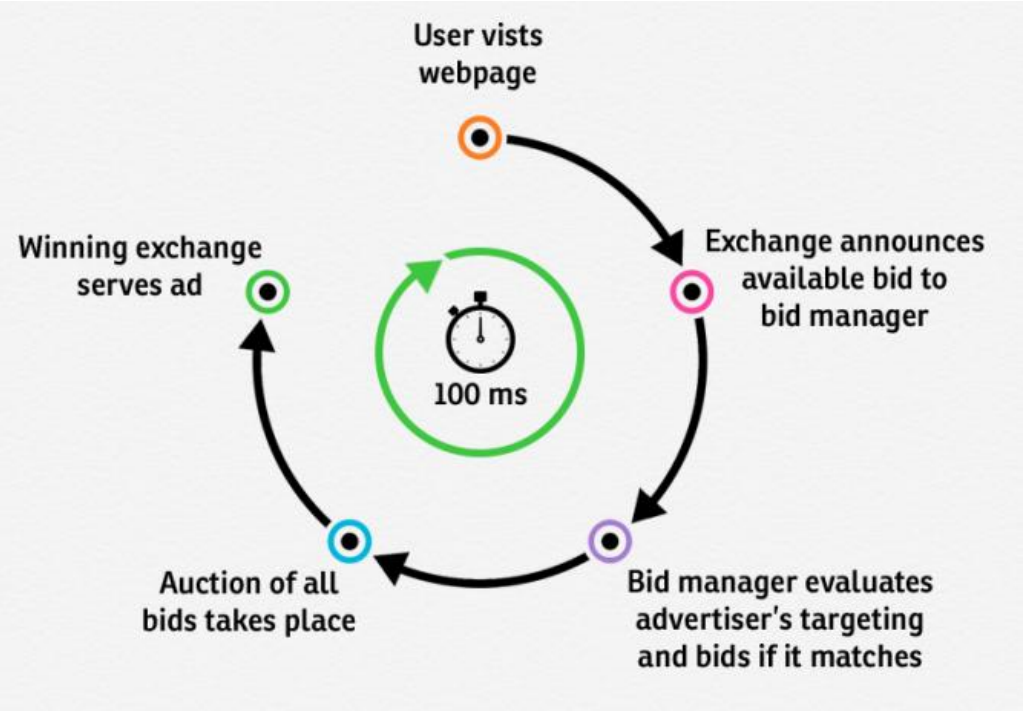

Image 2 How real time bidding works (Lopez 2014.)

The RTB way of buying and selling ads enables advertisers and publishers to numerous ways of making transactions more efficient. The advertisers can for example use algorithmic buying where they utilize machine learning in automatically adjusting what they bid on the auction (Cailean 6.1.2016.) Publishers can set different floor prices to make sure they

are not selling for too little in the case when there is not many DSP’s in the auction (Doherty 2014.)

3 Use of data in online marketing

Of all the data that now exists, 90% has been generated after the year 2015. The daily output of data today is 2,5 quintillion bytes (Hale 2017.) Put into perspective, that would be 833 billion high resolution images a day. Digitalization has completely changed the proportions of amounts of data. Digital platforms log everything that is being done on them and the data can exist in perpetuity.

Use and access of data serves arguably one of the biggest advantages of online marketing and advertising. Marketers' websites, online stores and social media channels log everything that the customers operate on them. By analysing this data, the marketers can identify sales funnels, create loyalty programs, find price points and detect their customers purchase behaviour for example. All of this can be done from the marketers' own data that they log from how their platforms are being used. This can be used in any marketing form. However, what serves as the unique possibility for digital advertising is cookie-based data (Ryan 2014, 72-74.)

Browser cookie is a small text file that a site sends to the browser. A browser then saves the cookie and when the user returns on the same site, they can be identified as the same user returning and not a new unique user. Even though the technique and purpose behind cookies might seem like intrusive and unsafe, it mostly isn't. Cookies are just text files, so through them any programming can't be executed. Server identifying the user makes the browsing experience much more seamless and effortless when for example a weather site remembers from where you are used to check the weather or online store knows what you've been browsing. (Järvinen 2010, 165-170.)

Advertisers' utilize cookies through Data Management Platforms or DMP's for short. DMP is a technology that's purpose is to collect cookies, identify their users' profiles and harness this data into use of advertising. DMP inserts its cookie to the user's browser. This can be done via an ad, a social media share button, a site visit etc. It then starts to track what kind of sites the user is visiting and creates a profile of the user. The attributes that are profiled can be for example age, gender, interests, parental status etc. (Nesamoney 2015, 17-22.) DMP rearranges the data into form that the advertising systems can use the data and match the same user from sites where ads are run. There are dozens of DMP's who gather and process data different ways. Data from a DMP can be used in many ways but the most used and notable ones are covered in the next sub-chapters.

3.1 Targeting

Most well-known way of utilizing data is ad targeting. Reaching the right audience at the right time with the right message at the right place has been the premise and cornerstone for advertising since the dawn of time. Targeting has always been a part of advertising, but previously it has been based on estimations of the audiences. For example, a brand that's target market is middle-aged females have advertised in magazines and TV shows with the same target audience. The reality then has been that the ad has been seen by many people outside the target group but also missed by many that belong to the target group but just don't enjoy these magazines or TV shows. Digital however is different. Consumers can be reached from all over the internet and the decision whether or not to serve ads to them can be made in real time based on their current interests. DMP's make the data usable in advertising use (Nesamoney 2015, 31-35.)

Let's take a car advertiser for example. Their goal is to promote their accessory deal for new car buyers. The campaign will be on for three weeks after the New Year's Eve. Target audience is people who are intending to buy a new car. Programmatic display buying is being used as the type of advertising because of its advanced targeting capabilities. The DMP gathers a pool of users who frequent a second-hand car dealership website often. The system then labels these users as "auto-intenders" and creates a group out of them. These peoples' cookie ID's are then pushed into the car advertisers DSP to be used in ad targeting. The advertiser specifies how they value the users in this group and decides the price of their bid in the open auction. In the bid request, the SSP passes the cookie ID as one of the data attributes for the DSP's. If the cookie in the bid request matches the cookie ID that the DMP has pushed for the DSP to use, the DSP bids accordingly and the user is served the car advertisement (Kihn 12.1.2016, Kihn 14.1.2016)

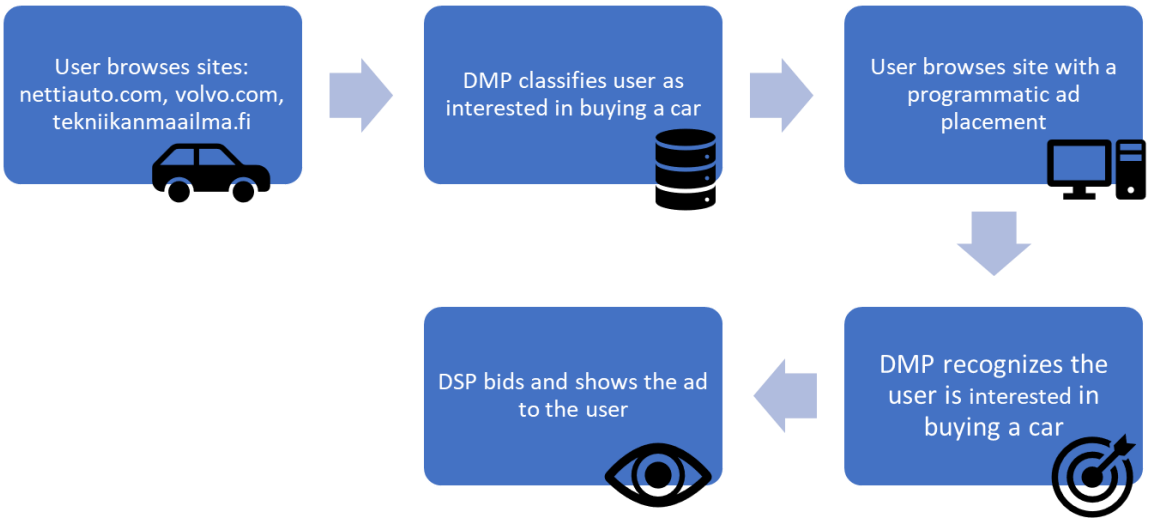

Image 3 Example of targeting in programmatic (Kihn 12.1.2016, Kihn 14.1.2016.)

As can be seen from the example, identifying and realizing the audience is one of the most important parts of targeting. If the car advertisers accessory deal affects only buyers of brand new cars, is targeting people interested in used cars wise? The question can only be answered by market researching or testing. However, there is also an algorithmic way of discovering audiences. This method is called lookalike modelling (Hayter 6.9.2013.)

The goal of lookalike modelling is to find people who behave similarly than the actual customers but have yet to be converted into customers. Lookalike modelling is done by collecting a pool of users who complete a predefined action of the advertiser's website. For example, visit the purchase confirmation page or click a "download coupons"- button. The data of the user pool's interest are then analysed. The DMP uses different algorithms to identify which variables are statistically peaking in the pool of users and the similar variables are used to conduct the lookalike (Hayter 6.9.2013.) So much data is used and analysed when doing the lookalike model that it would be impossible without the data being in computable format and done by a DMP.

3.2 Ad personalization

Data driven ad personalization means altering the ads to make it more relevant to the consumer. It is the second notable way of utilizing data in addition to targeting. Personalization is fairly new way of using data and the ways to personalize are many (Nesamoney 2015, 31-35.)

Re-targeting is probably the oldest way of using data to personalize ads in digital advertising. In re-targeting, a user who visits the advertiser's website gets tracked. Now when he visits another site or a social media platform they get served with ads from the advertiser whose site they just visited. These ads' message can then be altered by the user's interests. For example, a clothing brand can serve the exact same pieces of clothing the customer has just been browsing on their site (Nesamoney 2015, 31-35, 39-41.) Re-targeting is fairly simple to execute and most digital advertising platforms such as Facebook, Google, Adform and Appnexus can run it on their own without a third party.

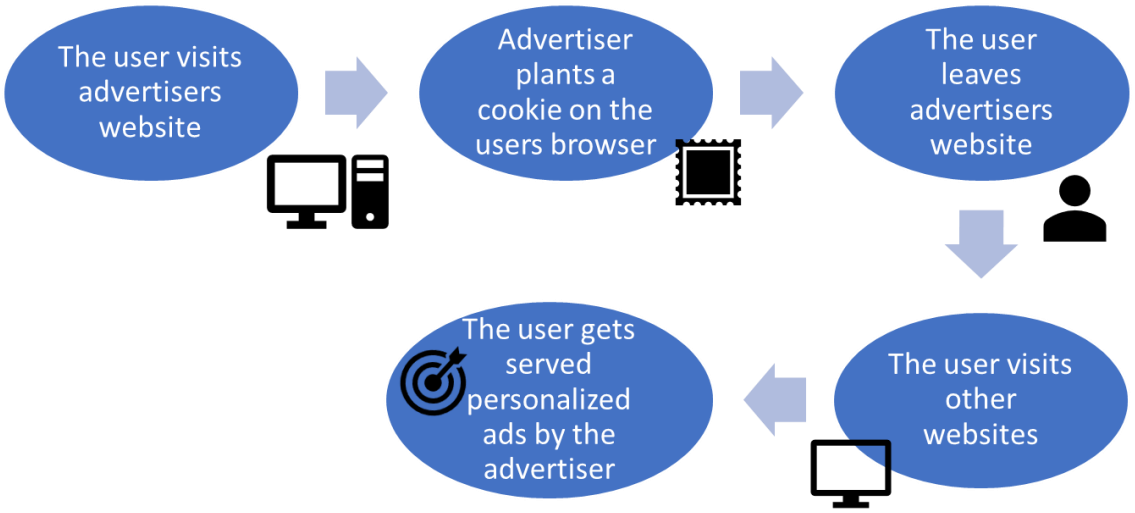

Image 4 How re-targeting works (Nesamoney 2015, 31-35, 39-41.)

A little bit more advanced way of ad personalization is called DCO. This another three-letter acronym stands for dynamic creative optimization. DCO means that the message of the ad can be altered by the best performing one. In the early stages of DCO, advertisers simply made several versions of creative material and tried which gives best results in terms of conversions or clicks. Different texts and colours could be used and the worst

performing got eliminated from rotation. The more advanced DCO can be done by utilizing the same data that the DMP is already using for targeting. Ads can be altered in real-time depending on what the interests and demographic profile of the users are. There are platforms and technologies for DCO where the creatives for different situations can be predetermined and the ads are served based on the user in real-time (Nesamoney 2015, 39-41.) In a simple example, an Apple iPhone 6 user can get ads for that specific phones accessories when browsing a mobile operator's website. Or perhaps a single man could get different grocery store products advertised to him than a grandmother of 3 children.

Personalization don't always purely need to be about the message of the ad or the audience of the user. It can also emphasize on the timing. External data can be used to trigger advertising at the relevant moment. Mobile advertising can be on only when your TV commercial is showing or eye drops product can be advertised only when the pollen count is high enough to cause allergic reactions. Self-service digital platforms such as Facebook or programmatic are especially handy for the use of triggering. When the advertiser isn't committed to spending a certain amount of money in predefined timeframe, contrary to the case with traditional media, they are free to advertise in only the moments that matter (Nesamoney 2015, 39-41, 63-66.)

3.3 Privacy

The biggest threat the internet era has brought to individual people is violations of personal privacy. Since advertising is one big entity that benefits from the vast amounts of data, privacy of the users is an important concern. The problem is that even though data usage brings relevant and on-the-point ads to the consumer, the fact that it can do that is often terrifying (Nesamoney 2015, 169-172.) Many are relying on ad-blockers and other technologies in order to prevent their personal data being used. This is already causing some counter reaction on the advertising industry.

Mostly, advertising tries to avoid using data that rely on personal details such as names, addresses or other data that is personally identifiable. Pseudonymisation and cookie syncing are few ways to secure that advertisers can't identify the users behind the cookies. An advertiser doesn't need to know who it exactly is that is viewing and ad. They just want to know if they are probable to be or become their customer.

Interest targeting is collected through profiling of the cookies. Cookies don't directly gather or evaluate interests of what people are interested in. Those cookies need to be analysed

thoroughly in order to extract user interests out of them. Different parts of the digital advertising supply chains don't even use the same cookies. The DSP and SSP on a programmatic buy use different ID's on the cookies they store (Nesamoney 2015, 169-172.)

Online privacy has been regulated for almost as long as there has been computers. First legislation regarding computed personal data in Europe dates back to the year 1981. That year the Council of Europe formed some standards of information flow within Europe. In the Convention for the Protection of Individuals with regards to Automatic Processing of Personal Data, rules were laid out that became the foundation of EU personal data legislation. These were followed besides the European Convention of Human Rights until in 1995 the rise of the Internet forced the EU to form internet privacy into its own directive. This saw the enactment of Data Protection Directive (DPD). For many years the DPD laid out internet privacy legislation. Being a directive rather than a regulation, the member states were obliged to form local laws based on this directive. This lead into a discrepancy between legislation between countries and the basic purpose of the DPD and its successive legislation, free flow of information, was not achieved. This lead into the implementation of the GDPR which repeals the 1995 directive (Calder 2016, 3-8.)

As a regulation the GDPR ensures that the rules across the EU member states are equal. Regulations are applied as they are at the same time in all member states, whereas directives are just a guideline of how to legislate on the local level. Another driver besides consistent legislation, was how fast technology is changing and how big of an issue privacy concerns has become with the digitalization (Calder 2016, 3-8.) Important to remember about the GDPR is that whilst it heavily impacts on advertising, those who have been doing data-driven advertising transparently and ethically shouldn't have any problem complying with the regulation.

The fundamental right for privacy is an important issue and not in such good place everywhere as it is in Europe. China is increasing online surveillance of its people and businesses (Mozur 2016.) The USA is considering the repealing of net neutrality, a rule that denies big internet service providers from restricting or blocking certain internet access without a premium payment (Coldewey 2017.) Even though the GDPR might cause a setback on personalized and relevant advertising, the regulation is a win for the fundamental rights of the citizens of the EU.

4 Creating the GDPR handbook

This chapter will analyse and describe the creation of the GDPR handbook. The handbook is the product and the empiric study of this thesis. The conduction of the product had two clear goals. First, to research the GDPR and find the most relevant and industry changing parts and details of it. What needed to be realized was that the biggest changes the regulation caused for the digital marketing industry might have been hiding in the small details of the regulation. Even the tiniest particulars could have had a big effect if they were to regulate a certain part essential to digital marketing. Second goal was to find a way to present these aforementioned important changes in a way that is easy to understand and would benefit the largest possible amount of industry professionals and students. Without being too exhaustive and detailed but still keeping the crucial details present in the product.

The research for the product was done mainly based on the book European Data Protection Law edited by Andreas Linder. This book holds the Regulation (EU) 2016/679, the General Data Protection Regulation, in its entirety. It was imperative to have the regulation in a format where markings and underlining were possible to make. A source for fast searching and revisiting of information about the GDPR was found online in https://gdpr-info.eu by Intersoft Consulting. This proved out to be the most easily accessible and navigable online source for the full regulation. It being done by a third party didn't matter either because the regulation is strictly written in one single format which could be checked from the European Union's official law directory eur-lex.europa.eu. Reading through the regulation proved out to be more challenging than regular English written text. For this, help was seeked from Alan Calder's book EU GDPR – A Pocket Guide. In this compact paperback Calder goes through each key topic of the regulation and explains them in more layman's terms. While Calder's interpretation helped the comprehension of the regulation, it wouldn't have been enough to conduct the whole product from. All of chapter 4 of this thesis is referencing these sources.

The product is done by combining the backbone understanding of the digital marketing industry to the exhaustive research done about the GDPR. These two were reflected on each other all the time. Goals of relevance and applicability were kept in mind through the whole process.

4.1 Choosing the format

GDPR is consisted of 99 articles and its written in the style of legislature lingo. Printed out it is roughly 300 pages long. Therefore, formatting all of that in an understandable way without excluding any vital information was an important challenge. The goal of the format was that the product would be easy enough for anyone working in or studying the digital marketing industry to go through, still providing all necessary information about the GDPR in different situations. The options for the format were numerous. The most notable ones were a book, a stylized Word document or a powerpoint/pdf-handbook. Every formats' advantages and disadvantages were examined.

A book's advantage is that it stores the most amount of information. There could be vast chapters for explaining all the details of how the GDPR affects different ways. One possibility the book format offers would be to mirror the law to different contexts of its use. For example: one chapter on how it affects to social media, one chapter how it affects programmatic buying, one for search engine marketing etc. A book also has the space for a full glossary in the end to open up specific terms. However, where a book format is vast in storing space for information, it falls short on practicality and simplicity. The point of this thesis is to package the GDPR as simply and accessibly as possible while maintaining the angle of digital marketing in it. And a book would not achieve that. In fact, books about GDPR's compliance already exist in many forms.

Microsoft's Word has become a long way from a simple word processor software. Nowadays it supports immense amount of tools to rearrange the text in different kinds of complex ways. Word document can still hold a vast amount of text but keep a structured look and utilize graphs, shapes, macros and links to refer inside the file and to outside sources. Links to actual GDPR articles would be possible. A Word document would serve perfectly for someone who really has the time and effort to learn about the GDPR. It works both printed and on screen. The downside and reason of why this format was not picked is in the end its lack of visuality. GDPR handbook should be more about being a tool than a source of information. A Word document has the focus on the textual content when the guidebook should be something that logically teaches the reader how to comply.

Considering all the aspects. And all the goals the handbook should achieve. The format was chosen to be a pdf/PowerPoint handbook. Emphasis on this kind of format is fully visual. In fact, many say that the less a PowerPoint has text the better. The guidebook can include charts, info graphs, tests, lists etc. Anything visual that not only gives the information about the GDPR but makes the reader understand what it means in practice. The

user can also easily find the most relevant part and use the handbook as an everyday tool. PDF version is good for printing and PowerPoint is good to be used on screen.

4.2 Design and colour coding

The design of the handbook needed to serve two purposes. To look appealing for the reader and maybe even more importantly, to be practical. That's why from the very start the powerpoints' orientation was decided to be switched from horizontal to vertical. So that it would make sense especially printed. The pages were left with some empty space for readers own notes. The reader is encouraged, in the introduction, to use this space.

The background was done with colour fill but 95% transparency. This and the lines on the right-hand side margin helps the reader to know which topic are they on. The colour of the margin and the background changes according to the topic of the page. This comes in handy not necessarily on the first read but when revisiting the handbook.

The 45-degree angle line on the bottom of each page is also not just a vanity item. The purpose is to track the colour coding from the sides of the page. On the digital version the askew line serves as a marking for page break.

The footer on each page references to the actual article of the GDPR the current page information is based on. This proved out to be the most effective way of referencing because all the information on the handbook is referencing the GDPR and no else documents.

Colour coding brings structure to the handbook. It is especially useful when the reader is coming back to the handbook to check specific topic.

The colour coding was done as following:
Blue for general parts not referencing the GDPR. Such as Introduction, quick facts, cover and back. Thus, making it the main theme colour.

Green for definitions. An essential condition to understand the GDPR is to know definitions of its core elements. That's why a whole section is dedicated to the definitions and just like on the GDPR, they are located on the very beginning of the handbook.

Orange for rules and specific obligations of the GDPR. This section consists of specific rules and requirements the regulation sets. The orange section is supposed to give the outlines of complying, but it needs to be mirrored to each organisations' needs.

Purple for rights and responsibilities. These could have been divided into two different sections but were decided to be kept together. Rights and responsibilities are more like coexisting conditions than opposite sides of a spectrum.

In the end the colour coding fulfilled successfully it's purpose of creating structure and increasing memorability.

4.3 Parts not covered on the handbook

Out of 99 articles of the General Data Protection Regulation this handbook covers parts of only the first 42 articles. Since it is not even half of the total amount of articles, one could make the argument that the handbook wouldn't be sufficient enough. That is not the case however.

Just like everything that was picked to be covered in the handbook was carefully thought, so was everything that was left out. As the handbooks introduction already states, it is not supposed to be a compliance guide. Reading through the handbook isn't enough for being able to know the regulation through and through. That can only be achieved by reading the full regulation with legal experts. The goal of the handbook is simply to introduce the reader to what is the GDPR about and what needs to be thought of it as a marketer.

Last article covered on the handbook is Article 42 Certification. The article is about GDPR certificates which the organizations working under the GDPR are obligated to have. This Article finishes Chapter IV of the regulation which is titled Controller and Processor. This was still important and relevant for the use of this particular handbook. The chapter describes administrative responsibilities and responsibilities for both controller and a processor.

The option of leaving this chapter completely out of the handbook was still considered. Some ways the articles of this chapter already go a little too detailed. For example Article 26 that describes the situation of multiple controllers. A fact which is important to know for someone who is a 'joint controller' working under the GDPR but could be seen as unnecessary and excessive for the purpose of this handbook.

Chapter IV was left in because it provided very concrete information about the responsibilities for controllers and processors. This continued the storyline and themes of the handbook seamlessly and the information ended up wrapping up the handbook perfectly.

What follows Chapter IV is chapter that is titled “Transfers of personal data to third countries or international organisations”. As Article IV was considered if it should have been left out but was taken in, this chapter was the opposite. Data transfers to outside of EU is a big part of the GDPR. Foreign organizations outside Europe that work in the EU/ETA area are not allowed to transfer the data of their European data subjects outside EU without separate permission. However, this can be seen as an issue that mostly concern larger scale structures in huge international organizations. When the demographic audience of this handbook is more the individual workers and students on the digital marketing industry, the topic of data transfers abroad was seen missing the point.

From this chapter onwards the GDPR just takes itself further away from the general rulings concerning all marketers to very detailed even bureaucratic direction. Mostly everything was trimmed out with no hesitation from these chapters. Trying to fit this information to the handbook wouldn’t have brought any value to it and in worst case would have made it more complex and inapproachable.

One crucial detail was hidden in these chapters however. The maximum penalty is mentioned in Article 83 “General conditions for imposing administrative fines”. This information was used in the introduction and quick facts-page of the handbook.

The chapters left out from the handbook were:
Chapter V: Chapter 5 Transfers of personal data to third countries or international organisations
Chapter VI: Independent supervisory authorities
Chapter VII: Cooperation and consistency
Chapter VIII: Remedies, liability and penalties
Chapter IX: Provisions relating to specific processing situations
Chapter X: Delegated acts and implementing acts
Chapter XI: Final provisions

4.4 Section 1: Preface

First few pages of the handbook should serve as the framework and starting point to it. The preface is divided into 3 parts. Introduction, table of contents and quick facts about the GDPR.

Introduction starts off the handbook. The goal in this part was to give the reader a brief outlook on what's the state of internet privacy and what the EU is trying to fight against with the GDPR. It needed to be made clear that while this handbook is a great tool to get to know the regulation, it does not serve as an air tight compliance guide. Anyone who is responsible for the compliance of the GDPR should take their time to study the whole regulation from cover-to-cover. This introduction is supposed to ignite the interest of the reader and have them engage to it. That's why the text is addressing the reader directly and encourages them to make the handbook "wrinkled and dirty".

Introduction is like a welcome sign for the reader to enter the handbook. First impressions count and the first impression to the handbook is made here. The introduction needed to be interesting and make the reader want to read more. Its purpose is also to justify why creating this handbook was necessary. In a way, the introduction presents a problem and the rest of the handbook is about solving that problem.

Larger scale of the themes of the GDPR is introduced on the introduction. The scale of civil rights issues is weighed on a global level, mentioning Facebook and Google and how they have earned their position partly by exploiting privacy. Providing a context of why the regulation was made in the first place was important. Going too deep into legal lingo in the introduction could have lead into losing the interest of the reader. Differences to the world outside EU were also seen beneficial to be mentioned on the introduction. The GDPR is an exceptional step towards personal privacy so a global context was needed to be given for the reader.

Quick facts page was added to finish the preface with some specific details of the regulation. Quick facts provide the reader with the framework of what the GDPR is. The reader gets an idea of when the regulation takes into effect, what are the penalties of infliction, who monitors the compliance and why the regulation was made in the first place.

The regulation number needs to be told so the reader can first check the source for the handbook and deepen their knowledge about certain parts of the regulation. With the regulation number anyone can find the whole regulation in any language of the EU from

eurlex data base in http://eur-lex.europa.eu/. This data base collects all the legislative acts of the EU for any citizen to access. Providing regulation number also creates accountability to the handbook.

Date of adoption and date of application were important to be provided separately. Date of application is arguably more relevant information because it is coming soon. Still, date of adoption underlines that the regulation is so big that 2 years was seen necessary to be given for preparations.

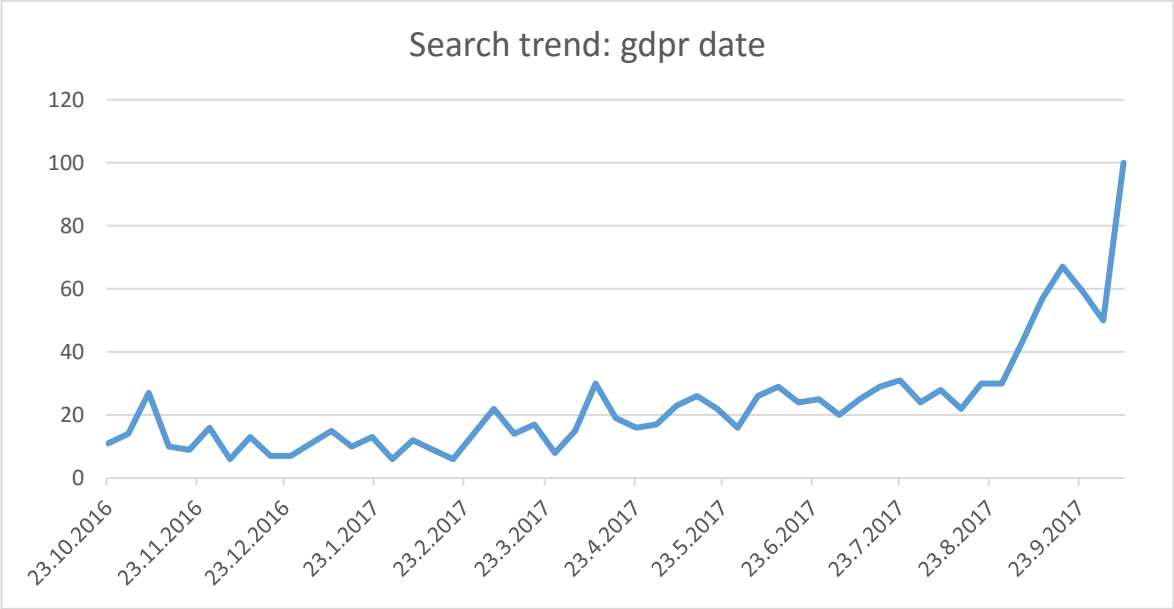

Image 5 Google trends: gdpr date (Google Trends 2017.)

Date of application is also something many people seem to be interested in while the date of application is getting nearer and nearer. This can also be seen from analysing the Google Trends of keyword pair “gdpr date”.

Journalists seem to love the maximum penalties of the GDPR. 20 million euros or 4% of global revenue is so massive that most publications use it to describe the scale of the GDPR. It also hints that the GDPR is above all made to protect citizens from big corporations. Many of the companies that are most vulnerable to break the regulation has so large revenues that 4% of global revenue exceeds 20 million euros easily.

Supervisory authority is mentioned later on the handbook but it was important to mention Finnish Communications Regulatory Authority on the quick facts as well. People are often confused who monitors each law and regulation set by legislators domestically and on the EU level. It is important to know that the GDPR is not investigated primarily by the police

but the Finnish Communications Regulatory Authority. When this is mentioned on the start of the handbook the reader knows who to contact about issues regarding this regulation.

Subject matter and objectives are a straight quote from the GDPR. This is the only time in the handbook that a full article is fully quoted. This is the first article of the regulation and it describes curtly what is the objective of the GDPR. The language is very decisive and straight and doesn't have too many legal peculiarities in the language. That's why the whole article was confidently quoted. This is the final piece of text preparing the reader for the handbook. Last time the readers preconceptions could be affected. The article 1 is perfect for this.

4.5 Section 2: Definitions

Article 4 of the GDPR is defining the definitions for the key parts and terms of the regulation. It is a little shorter on the amount of texts than other crucial parts of the regulation but nonetheless important. For this reason, it was decided that definitions will need a whole section dedicated to it. That section comes after preface and is colour coded green. All of the pages follow the same structure. Top part explains what the page is about, and lower part utilizes hollow box bullet points for specific items mentioned in the GDPR. The boxes can be ticked and the slides have room for notes. Topics covered in Definitions chapter are: personal data, processing, profiling and the difference between controller and processor.

The definitions section has the most pages on the handbook per articles covered.. This part of the regulation was seen as perhaps the most informatic regarding the handbook. Elementary level knowledge that's in the absolute core of the GDPR. Anyone who works under the regulation needs to understand these basic concepts of PII, data processing, etc. Dedicating a whole section for this topic and the article was essentially crucial to get the handbook to serve its purpose. The possibility to gather all the definitions to one page was weighed since they are quite short in the actual regulation. However, this would have made the page too heavy to digest and it would have had a negative effect on how important the reader sees the definitions are.

Marketing point of view heavily affected which definitions were covered in the handbook. There's 26 different definitions on article 4. Of these 26 only 5 were used on the definitions section. Other definitions are referenced later on the handbook. The reason why these 5 was picked to this particular section was the marketing angle. For a financial or legal handbook some other parts could've been picked but these were clearly the most relevant regarding ad targeting and marketing tech solutions.

The definition part is all on the article 4. Other articles of the regulation weren't used when creating this section.

When such a grand regulation is covering the issue of personally identifiable information the first thing to know is what is considered as personal data or personally identifiable information as it's sometimes known.

The page of personal data consists of upper explanation part and lower part with a list of data categories that are specifically mentioned as personally identifiable in the article 4. On the explanation the purpose was to communicate that the definition of personal data is the core of everything that has to do with the GDPR. It should come through from the text that the definition is quite broad and a lot of actionable data categories are considered personal data.

As a marketer it was important to add that browser cookies and other online identifiers are now considered personally identifiable information. If this handbook were to be targeted to different kind of demographic than marketers, this highlighting would probably have been left out. It is essential that marketers in the future understand that cookies are, undeniably and indisputably, personal data.

The bullets used are "tick boxes" so that the reader can evaluate and mark how many of these their data is processing. The list is just listing everything that is mentioned as examples on the regulation. This list is quite extensive and as such makes clear how broad the definition of personally identifiable information is stretched from now on.

After identifying what is personal data, it needs to be known what can be done with it. So, when the first definition was what data is categorised as personal, the next would need to be what actions are considered processing.

Processing is a word so broad that a marketer could end up thinking what they are doing with data isn't processing. Therefore, it is crucial to specify everything that the GDPR considers as data processing. Collection and erasure is already considered as processing activities. This page needed to make it clear for the reader that anything done with personal data is processing. Even if it's not on the list it is highly likely considered processing in the face of the law. Automated processing is no different and it is mentioned on the explanation part.

The top section states one crucial detail about the regulation. This detail is that a data processor needs to know and show what are they going to do with collected data. This needs to be communicated to the data subject somehow. It is important that the data processor knows to reflect and detect how are they actually using the data they collect. Also, to know that data collecting is also a processing action. This reads just as two clear claims on the explanation part. The burden of responsibility was intended to be made as clear as possible this way.

Lower section again consists of hollow box bullet points so that the user can mark the means of processing relevant to their business. These are again straight from the definition itself to make the rendition as accurate as possible. Any key part of the definition mustn't have left out because of shortening the list for the handbook. The long list of processing activities also underline that essentially anything that can be done with ones personally identifiable information is considered data processing.

If this was a general overview of the regulation, a specific part of the definition of profiling might have been left out. However, this particular mean of processing is crucial to digital marketing. The fact that the GDPR specifically mentions and highlights profiling as a processing activity can very much be because of the marketing point of view. The regulation is of course not only done because of advertising. Yet, given how large part marketing acts on the issue of internet privacy, it is not far-fetched to assume some parts of the GDPR are there just to regulate advertising.

The page for profiling comes right after the most core definitions of the regulation. This was purposefully done to assure the reader how in the core of the GDPR the issue of profiling is. Really a substantial part of the data used in ad targeting is acquired by profiling. It is very efficient and scalable way of data processing. It is also, at least before the GDPR, quite legitimate way since no data about name, age, gender etc is given. The new regulation however makes it very clear that this popular way of gathering and using data is subject to the GDPR.

The regulation specifically mentions that evaluating or predicting personal preferences, interests, behavior or location is considered profiling. Ad targeting is often based on profiling those categories from online identifiers or cookies. This is essential to understand as a marketer. Even though you can't identify the actual user out of your database, you still are very much subject to the GDPR.

This is emphasized on the explanation segment. That profiling especially concerns advertisers and they need to know what it is. An example is given that should peak any marketers interest who reads the handbook. The example mentions behaviour and interests as categories of processing, browser cookies as personal data and profiling as the processing activity. The reader is supposed to relate and understand that this is what they do daily and that it is subject to the GDPR.

The definitions section is wrapped up with the test of controller or processor. The GDPR sees subjects of the regulation are of two kinds. Controllers and processors. This page helps the reader to identify themselves as one of these.

Later on the GDPR, this topic has a whole chapter (Chapter IV: Controller and processor) and 19 articles dedicated to it. That's why it is very important for the compliance of this regulation to know if one is either controller or a processor. This is communicated very directly on the upper segment of the page. The reader needs to understand that the self-reflection of where they stand is the important part right now. Not necessarily how the responsibilities vary between controller and processor.

All of the basic rulings laid out in the GDPR of course affects both the controller and the processor. There is no way that for example in a case of data transparency someone could claim they are only the processor and therefore weren't obligated to provide the information. The GDPR is clear on the definition of controllers and processors and it is crucial for someone working under the regulation to distinguish the difference between the two.

Lower part of this slide offers a simple tool for identifying this. Two sentences, one describing a controller and one describing a processor. This is called the test of controller/processor. Whichever suits the reader best is where they stand. As this handbook is supposed to serve as a set of tools for marketers, this test needed to be as simple as possible. That's why the differences of controller and processor are bolded.

The Controller and processor slide is the last of the definitions and it concludes the green coded section of the handbook.

4.6 Section 3: Rules and obligations

Next 4 pages of the handbook were clustered as the "Rules and obligations" part. This does not derive straight form the structure of the GDPR but was decided for the sake of

structure of the handbook itself. The line between this section and the fourth one is less obvious than the transition from definitions to the rules and obligations part. The idea of not dividing part 3 and 4 was even considered. In the end it was better to have two different segments after definitions because of consistency and continuity. The two sections also do have their characteristic differences although a little vaguer.

Rules and obligations states of the actual rules of play the GDPR decrees. How data is to be handled and what needs to be done when processing data. For example, how can the consent for data processing be gotten and what kind of data categories need more than generic consent. The third section is colour coded orange. The information for these pages is gathered from articles 5-9 of the regulation. The topics are 5 commitments when processing personal data, lawfulness of processing, conditions of consent and special categories of personal data.

The definitions on article 4 are followed by principles on articles 5-11. Article 5 starts off with 6 general principles that determine how personal data should be processed. 5 “commitments” or commands for processing of personal data were formed from these principles.

Article 5 in a way summarizes the key parts of the regulation. Its topics are lawfulness, transparency, data minimisation, accuracy and integrity among others. Principles tell what the regulation is done for and what are the key topics of it. How to gather these on a page was a challenging task but to convert them into 5 commitments when processing personal data was a good way. In a way, principles are a sort of commitments just in a different sentence type and context.

Upper part of the commitments page explains that an advertiser can act as the processor or controller and often they do that simultaneously. Anyone who works with personal data, whether a controller or a processor is obliged to act by these principles. Short confronting sentences were used to make the message simple and clear.

Lower segment lists the five commitments. Reconstructed from the regulation into first person perspective pledges. For example, “I know exactly what am I collecting data for” is the first commitment. This way the reader engages to the text and understands that this concern themselves.

Article 6 of the GDPR defies the conditions for the processing to be lawful. It is very straight forward on what the requirements are. These provisions were gathered on the ‘lawfulness of processing’-page of the handbook.

For marketers there really is only one way of securing lawful data processing. That is to get consent from the data subject. Although there are other three definitions for lawful data processing, none of them really applies for marketing. Data processing is never for example necessary for vital interests of the data subject when it comes to marketing.

Top part of this page is only two sentences. Continuing the same mean of influencing as before, the explanation part was kept very clear. If one of the mentioned conditions don’t apply, processing PII is illegal. For marketers, it is almost always the given consent. This is mentioned separately on the upper part of this page.

The list of the requirements was decided to be called the “test of lawfulness”. A tool for the reader to test if their processing is lawful or not. The consent condition is highlighted with red colour because it truly is the most relevant for advertisers and marketers. Other means were not to be forgotten though because it is important for anyone to understand the larger scale of the regulation than what concerns themselves.

Next page after lawfulness is about conditions of consent. Specifying the conditions of consent is one of the cornerstones of the GDPR. This is one of the most effecting changes that the regulation brigs for marketers. Before the GDPR, data collection has been quite simple. Especially cookie based tracking. Consent have been able to be gathered by pre-filled consent clauses or just simply claiming that by continuing to use a site, the user gives their consent. This is called passive consent and the GDPR bans it as a mean of obtaining user consent. Other big changes are that consent must be able to be withdrawn whenever and the user must be made aware of every processing activity their data is used for. So, in marketing, the user must be made aware of that their data is used in both direct targeting of ads (retargeting) and profiling.

Explanation part of this page explains this new way of thinking about consent. It is made clear that this is a big change and it should be considered in marketing under the new regulation. The banning of passive consent is also explained in simple terms.

Bottom section of the page lists the requirements of consent. It is titled “Conditions of consent” which is also the title of the Article 7 of the GDPR. This list consists of 5 points of the

requirements of what all consent should be. Denying passive consent is placed first because it is a big change for digital marketing. All the points are written in as simple format as possible.

All the information for this page of the handbook are in reference to the articles 7-8 of the GDPR and the recitals of those articles.

Consent is followed by the page for special data categories. This is a natural transition because these special categories require explicit consent. This means that the data processor needs to ask specific permission to process this kind of data. These special categories are more sensitive than regular data categories. They include for example sexual orientation and trade union membership. Political views and religious beliefs. The regulation aims to protect people from spilling their most sensitive personal information unwillingly.

Explanation part of this page is done extremely plain and simple. Again, steering away from too detailed explanation it is made clear how blunt a rule is set upon the matter. The link to consent is also made clear. Special categories require explicit consent and the words “explicit consent” are bolded.

Lower part of the page is a list of examples of special categories. To avoid missing any information the legislators have tried to pass on their examples on the regulation, it was decided to use the same examples. The categories are very different but every one of them represent a more sensitive information than regular data categories such as name. Room for notes and scribbles were left on top and under the list. This way the user of the handbook can add specific categories relevant to their business.

The article that covers special categories of data and the explicit consent is Article 9. This page was made in reference to that article and its recitals.

Special categories wrap up the rules and obligations section of the handbook. Chapter II of the GDPR still has two articles which were left out from the handbook. These are articles 10 and 11 and their titles are “Processing of personal data relating to criminal convictions and offences” and “Processing which does not require identification”.

These articles were not seen as relevant for the purpose of this handbook. Criminal convictions and offences aren’t especially useful for most marketers. Article 11 states that if processing does no longer need identification and use of personal data the identification shouldn’t be done just because of the regulation. In other words, it is allowed to develop

processes so that the processor no longer needs personal data identification. This is so obvious that it was decided to be left out from the handbook.

4.7 Section 4: Rights and responsibilities

Final 5 pages of the handbook covers the rights and responsibilities the GDPR sets for data subjects, controllers and processors. These are more concrete things that what the previous sections were about. The range of articles are also much broader than the first 3 sections. Information for this final part of the handbook are gathered from articles 12-42. When the whole of the handbook until this point was only from 9 articles. This also describes the way the regulation develops. Starting from broad subjects and large policies finishing to more niche and detailed articles used only in specific situations.

Important to note also is that the GDPR is not a marketing law. The regulation has 99 articles and many of them give guidance to the regulatory authority and specific cases of data usage. The authorities and the public sector is the focus in many of the articles in the latter part of the regulation.
Rights and regulations were seen best to be left to the end of the handbook. While transitioning from rules, definitions, obligations etc to more concrete rights and responsibilities the reader can hopefully reflect themselves now as both a processor and a data subject. A marketer and an individual EU citizen. This section is colour coded purple. The topics are transparency, the right to be forgotten', data protection by design and default, responsibilities as a processor and administrative responsibilities.

Data transparency starts off Chapter III of the GDPR. This chapter is about data subjects' rights and is one of the biggest reasons for the changing of privacy legislation in the EU.

A digital marketer under the GDPR needs to understand that on top of that they need to know what they are doing with data, they need to be able to show it as well. The data subject has the right to get the information with undue delay. Primarily it's the data controllers' responsibility to provide the information but all the data processors need to provide the information upon request as well.

One important detail about transparency that is relevant to digital marketing is that if a processor or a controller can demonstrate that they have no way to identify a user, they are freed from having to provide the requested details. Many of the data management platforms are built so that even the initial user's cookie ID is untraceable. In these cases, the transparent information is not needed to be given. This however in no way means that the

processor wouldn't be obliged to work under the regulation in some other way. The data subject is not allowed to make too many requests too frequently with malicious intent. What is too frequent is not decreed in the regulation, so it will most likely be up to the supervisory authority to decide in each case.

Since the topic of data transparency is so multilateral, this page of the handbook has significantly more text than the pages before. It was essential that all the points of view came through on this page. Transparency is a topic that also seems to attract a lot of discussion so covering all sides of it in the handbook was necessary. The explanation part explains first simply what transparency is, then that if the data is untraceable the information is not needed to be passed and finally that data subjects are not allowed to make the requests with malicious intent of harassment or such.

Lower part again consists of a list. This list tells what exactly is the data controller or processor obligated to provide upon requested. Important for the user of the handbook is also to understand that this is something they need to know to be complying with the GDPR.

All the information gathered on the transparency page is referencing the Articles 12-15 of the GDPR.

The right of data erasure or how it is often called 'the right to be forgotten' is perhaps one of the most discussed individual parts of the GDPR. At least the Guardian (Moore 2017) and Tech Crunch (Lomas 2017) have covered it recently. Right of data erasure simply means that the identifiable information about a person must be deleted in all data bases they want upon request or when the data is no longer used. The data subject can also demand false information to be corrected.

A data controller needs to understand that they can no longer claim data for perpetuity. If the user wants so or if the data is not needed anymore, it needs to be erased. Additionally, certain databases that have been relying on permanently stored data will need to change.

On this page the explanation part is simply constructed by explaining what is the definition for the right to be forgotten. Simple short sentences strengthen the message and makes the matter clear. Space is left above and under the text for notes and markings.

Lower part is a list of the circumstances when data needs to be erased. 4 points taken straight from Article 17 of the regulation.

Source for all the information on this page of the handbook is the Articles 16 and 17 of the GDPR.

Each company is obligated to build their conventions and services so that data protection is considered. Article 25 of The GDPR decrees that "Taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for rights and freedoms of natural persons posed by the processing, the controller shall, both at the time of the determination of the means for processing and at the time of the processing itself, implement appropriate technical and organisational measures, such as - - in order to meet the requirements of this Regulation and protect the rights of data subjects". That very broad ruling means that controllers and processors need to do their absolute best in efforts to secure data protection. The page of data protection by design and default is about this subject.

This part of the regulation prevents companies from neglecting the rights and freedoms of the people in the EU. Even though personal data wouldn't be in the core of the business a company is running, they need to assess if there is are any way their operations are risking anyone's personal data. Data protection needs to be taken account when designing services. So that personal data is secured from the beginning.

Upper part of the page explains what data protection by design and default means in practice. The phrase "- - need to do their best" was used to make the issue approachable and simply put. The reader of the handbook is supposed to understand the rough idea of what data protection by design and default comprehends. All the details are implied on this simple explanation.

Lower part gives examples of ways to secure data protection. These are derived straight from the GDPR. Risk assessment analysis of data protection is called "data protection impact assessment" and it is covered more thoroughly in the Article 35. Pseudonymisation means changing the names and labels of data to something that makes it more difficult to trace back to the data subject. Hashing is one way of pseudonymisation. Data minimisation means that data is used as little as possible. These terms are defined in the Article 4 of the GDPR.

The data protection by design and default page of the handbook is referencing the identically titled Article 25 of the GDPR.

As was already stated on the last page of the definitions section, data can be processed in the role of controller or a processor. Someone who determines the purposes and means of the processing of personal data is acting as a data controller. A processor processes personal data on behalf of the controller. Digital marketer can easily be either one or even more probably both at the same time. Although mainly everything on the GDPR applies to both controllers and processors, there are some extra responsibilities for a processor.

Description part explains that a digital marketer can often find itself being the processor and that it should be aware of that. An example of an agency being the processor is given because agencies carry out most digital buying. The reader is meant to relate to this and apply the thinking to their own work. To be safe and steer clear of misunderstandings, it is stated that if there is no processor the controller itself is responsible for processors responsibilities.

Lower part of this page lists the responsibilities of a processor. It is titled as “Processors guidelines” to bring a little colour to the text and to set the mindset of the reader so that they understand this is how one should act as a data processor. The regulation often talks about ‘supervisory authority’, this will be Viestintävirasto in Finland. This is also told in this page because of the last point where it is stated that the processor is responsible to be in cooperation with the supervisory authority.

The reference for this page of the handbook is Articles 28-31 of the GDPR.

The handbooks final page is about administrative responsibilities for those who work with personal data. There are few major ones and maybe the most relevant for all companies is the nomination of a data protection officer or in short, DPO. Every company that work with personal data needs to have an appointed DPO. The person can have other tasks in the company on top of their DPO work. One officer can be appointed for multiple markets in international companies. Other topics here are notifying data breaches to the supervisory authority, GDPR certifications for staff and data protection impact assessment. The impact assessment is a risk assessment that evaluates what kind of risks does the company’s way of storing and processing data includes. Not all risks are possible to be dealt with by today’s technology, but a controller should always be aware of the risks.

All the administrative responsibilities are very granular and concrete. Companies should understand that the GDPR brings not only regulating but also some more reporting burdens, certifications etc. Transparency towards the authorities is also emphasized in the

GDPR. If a breach of personal data happens, it needs to be communicated without hesitation to the authorities and the data subjects who are involved. Who is responsible for communicating that and how will it be done is for every organization to decide for themselves.

The explanation describes that in addition to rulings and ways of working, the GDPR also includes these administrative responsibilities. The local Finnish supervisory authority is also announced on the text. It is important anyone who works with personal data knows exactly who is responsible for pursuing the compliance of the regulation in Finland.

The lower part of this page lists the most essential administrative responsibilities for controllers and processors. These include communicating data breaches and nominating the DPO. The list gives a direction what are the most important administrative responsibilities and what kind of responsibilities those are.

This last page consists of the largest number of pages covered from the regulation. The page references to Articles 28-42. Administrative responsibilities are described very carefully and specifically in the GDPR and laying out all of these details would have been pointless for the sake of this handbook. To comply with the GDPR a company of course needs to be aware of all the little details as well but to make sure this handbook stays easily approachable, the too detailed specifics were left out. Administrative responsibilities page wraps up the purple section 4 and the whole handbook.

5 Conclusions

On this final chapter I go through the creation process of the thesis, evaluate the topicality and credibility of it and reflect on what I've learned during the process. I will give my opinions on what I think will be the impact of the GDPR when it applies in May of 2018. I will also introduce another EU regulation concerning the topic of personal data called ePrivacy Regulation. It is a separate regulation from the GDPR but it interlaps with it partly.

5.1 Topicality and credibility

When the year 2018 starts it is exactly 145 days until the application of the GDPR. As the date gets closer and closer, so grows the interest of the industry professionals towards it. Although the topic was picked already in late 2016 and the initial plan was to finalize the thesis on the spring of 2017, there would be no better time to publish this thesis as the end of 2017.

No one can know for sure what the impact of the regulation will be and thus what's the future of the internet will look like. What I've concluded from the discussions of my colleagues and the research I have conducted about the regulation while making this thesis I believe the impact will depend on three matters: What kind of ways and incentives are the data collectors able to invent for transparent gathering of user consent, what is the capacity of the supervisory authorities to supervise the compliance of the regulation and what kind of preliminary rulings upon specific matters of the GDPR are laid out during the coming years.

Before the GDPR has even taken into effect, a new wave of European privacy regulation is already on its way. This new regulation goes by the name ePrivacy Regulation and some say it would have even larger effect on digital marketing than the GDPR. ePrivacy regulation as it is proposed would make cookie based targeting nearly impossible. These are all speculations, even though the European Parliament voted for the bill to move forward in late October 2017 (Davies 2017.) I needed to truly evaluate whether to cover ePrivacy regulation on the thesis or not. I decided not to and here are a couple of reasons why. ePrivacy regulation is a separate law from the GDPR. Even though their subjects overlap they are not the same. The purpose of this thesis was to make sense of the impact the GDPR has on digital marketing and not how digital marketing will change considering all the other possible changes in the surrounding world. The talk about ePrivacy really hit the surface on the latter part of the year 2017. Being such a radical and relatively fast emerged proposal, chances were high that the internet lobbyists would have gotten it

buried. They still can and taken all into consideration it made sense to not cover ePrivacy on this thesis.

The credibility of the product of this thesis relies on how well were I able to interpret and understand the General Data Protection Regulation and which parts of it were I able to recognize as relevant for digital marketing. My studies and 2 years of working on the forefront of digital advertising field gave me very good base on the latter but since I do not study law, nor have I ever studied it, the interpretation of the regulation was a little more difficult.

Laws and regulations are always open to the people they concern. Anyone will need to be able to read them and at least understand the rights and responsibilities they bring to the people. I bought the regulation as a paperback book from Amazon so I could make markings on it when needed. I read through the whole regulation a couple of times to get an overall grip of its most relevant and least relevant parts regarding digital marketing. I also used the online version in the website https://gdpr-info.eu/ by Intersoft Consulting where they have converted the regulation into an easily accessible form. Finally, I read Alan Calder's EU GDPR – A pocket guide many times which is a booklet that goes through the regulation step by step explaining all the most important parts of it. Calder's booklet is a closest of a compliance guide from the material I read.

5.2 Assessment of the process

By the longest definition this thesis project took almost exactly two years. I will go through here these past two years and evaluate what I did right and what could've been done differently.

In December 2015 my studies were on the home stretch. I had just received a trainee-position, so those study credits would be available to be claimed after 3 months. I had only one additional credit to get in addition to trainee period and the thesis. I started to look into thesis subjects but I was not in a hurry to get it done. I had just started a new job that I seemed to love so I wanted to focus on that and start worrying about the thesis later. This was the first mistake I made. Considering the total workload from work and studies, the trainee period would have been perfect for making of the thesis.

I pondered the subject throughout the year 2016. I now realized that work is not getting any easier or less busy, so I wanted to get the thesis done. Finally, on the late 2016 I decided to pick the GDPR as the subject of my thesis. I knew it wasn't the easiest subject,

but it would be the most important and relevant topic available at that time. My plan was to get the thesis done during winter and spring and graduate on June 2017. However, when the process really started, I failed to organize myself as well as I would have supposed to. The regulation proved to be a lot tougher subject to comprehend and sort-out than expected. Reading and truly understanding the regulation took much more time than I previously had thought, and I just wasn't able to get the thesis done during the spring. Also, even though I tried to organize the process as well as I could I failed on keeping up to that plan. Deadlines I had set for different parts of the thesis came and went while I was still struggling to truly get started.

After June I needed a new plan. I decided to take a break from the studying and continue in the fall. New planned graduation time was December 2017. Taking a break on the summer turned out to be a good move. I was as motivated as ever to finalize my studies in the fall. I sat down with my thesis instructor and we laid out a plan on how should my thesis be done and in what time. I realized that while the spring felt like I got nothing done I had acquired a quite good knowledge of the topic. I started to get excited about my thesis and the process was now in full throttle.

The positive thing about this long process I had was that while working full time in the digital media industry, my thinking and knowledge about the field matured over time. What I had learned while working most definitely helped me with this complicated topic.

5.3 Own learning

The topic of the GDPR was not from the easier part of possible subjects. I considered long and hard if I would be up to making a bachelor's thesis about business administration that orbits around a 200-page EU Regulation. There were two clear drivers for me to pick this subject. First, no other topic would have been so topical. A massive change in regulation is such a powerful event that it impacts like almost no other event could. The whole industry is involved, and everyone needs to adapt. That added with the fact that the regulation will be applicable very soon made this subject perfectly topical. The second motivation for me was how could I be able to learn as much valuable information as possible from the thesis. If I would make a thesis about the GDPR that would mean I would need to study the GDPR and effectively learn about it. Without an external motivation like graduation, I perhaps would never have had the drive to really study and comprehend the regulation as thoroughly as I would now. I didn't also want to feel like wasting time with the thesis but to take everything out of it once I was anyway making one.

And learn I did. What I have learned to understand about the way my brain works is that for more complex issues for me to understand, it takes several repeats of studying to fully comprehend the big picture. The GDPR was what I read during bus rides and evenings. Not only while studying. In the end I really feel that my general understanding of the regulation grew to satisfactory level. I can at least evaluate what sort of impact will it bring to online marketing and the internet as a whole.

The GDPR was not the only thing I learned. While working in a company, one often acquires a little biased view of the industry that bases on their own experience of the field. I recognize that about myself from time to time, so it was refreshing to study other aspects on digital marketing that I'm maybe used to. Of course, many of it being similar which was also nice to learn.

Creating this thesis, I learned also a lot about gathering information and the academic workflow. What should be taken into consideration while making an academic study. From the hardships of the timing and concentration of workload I learned a valuable lesson about time managing. For a large project such as the thesis it really requires to have a plan on when to do something and what to do. That added up with what I have learned about the information collection process are the most valuable things I learned about the thesis creation.

In the end I am satisfied and proud of the product I was able to conduct for this thesis. As well as the whole paper itself. I did not have a mandate from any entity to make it, so I will most likely share it to whoever is interested in digital marketing and the GDPR. My two goals of topicality and learning were perfectly fulfilled.

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Appendices

Appendix 1. GDPR – A handbook for digital marketers

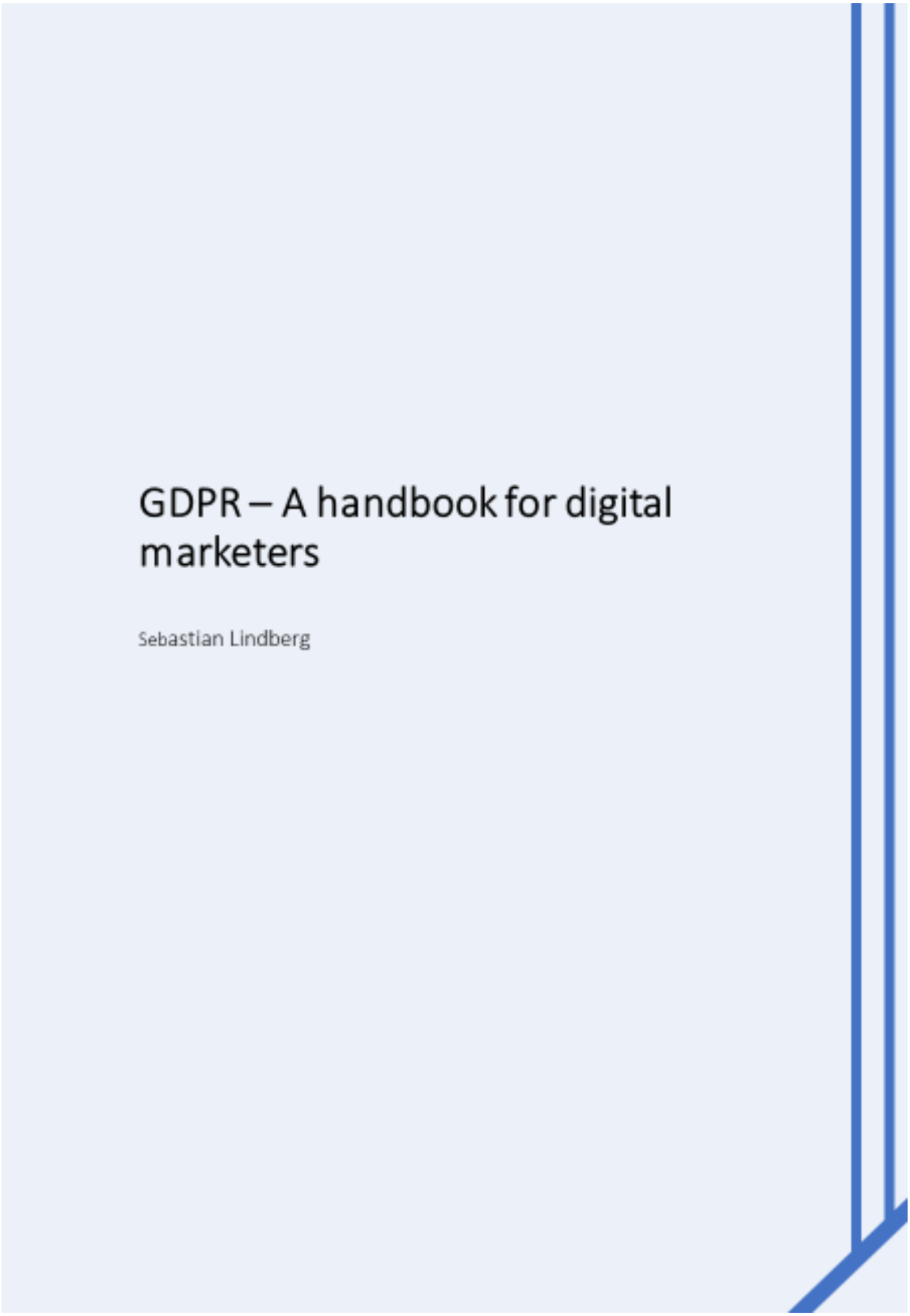

Table of contents

Quick facts

Regulation (EU) 2016/679

Date of adoption: 27.4.2016

Date of application: 25.5.2018

Max penalties: 20 million€ or 4% of annual revenue. Whichever is greater

Supervisory authority in Finland: Finnish Communications Regulatory Authority (Viestintävirasto)

Subject-matter and objectives:

- *This Regulation lays down rules relating to the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of personal data.*
- *This Regulation protects fundamental rights and freedoms of natural persons and in particular their right to the protection of personal data.*
- *The free movement of personal data within the Union shall be neither restricted nor prohibited for reasons connected with the protection of natural persons with regard to the processing of personal data.**

**Article 1 of the GDPR*

Introduction

Hi there dear reader!

Picking up this booklet, you must be interested in the wonderful world of the GDPR. It has been a buzz word in the marketing tech industry ever since its initial announcement in 2016. No one really knows what the impact will be in reality but signs are out there that it will be significant.

The issue of privacy is one of the biggest civil right's problems of the modern world. How can we make sure to keep our privacy and not get 'sold out' to big companies. In marketing people often talk about 'the duopoly' when referring to Facebook and Google. Both have achieved their goliath statuses with the same rough formula. Create an immensly popular service, capture as much data from the users as possible and then monetize everything you can from that data. Advertising is often the easiest way of doing so.

The EU took a grandiose stand backing its citizens with the GDPR. Setting rules for companies in the name of privacy is not to be taken for granted. At the same time as the EU is standing up for its citizens with the GDPR, the internet lobbyists in the US are doing everything they can to break down 'net neutrality'. That would give the internet companies for example full access to personal data and the right to limit usage by restricting or charging access to certain sites and services.

This booklet is not supposed to be a perfect guide for complying with the new legislation. It is truly the shortest possible way of presenting the GDPR. If you are responsible for compliance of this stuff in your organization, please take your time to read the full regulation. This booklet serves as the shortest TL;DR if you will. It is supposed to be a tool to get to know the ways you need to think as a marketer, in the world of data protection. It has free space for notes and color coding for easy browsing. Feel free to make it wrinkled and dirty. My only hope is that after reading it you can grasp the concept of the GDPR and pick this up easily when you need to know about it as a marketer.

Definitions

Personal data

First thing to do is check if the data in case is personal data by definition. Not all data is and the regulation specifies what personal data means in context of the GDPR.

The data subject can be identified directly or indirectly with especially the attributes listed below. If you process data that of any of the following identifiers you are processing personal data.

Important to note is that online identifier and as such, a browser cookie is now specified as personal data. This means that any kind of profiling of browser cookies can be considered processing of personal data.

Examples of personally identifiable information according to the GDPR

- ❑ name
- ❑ identification number
- ❑ location
- ❑ online identifier
- ❑ physical factors
- ❑ physiological factors
- ❑ genetic factors
- ❑ mental factors
- ❑ economic factors
- ❑ cultural factors
- ❑ social identity factors
- ❑ browser cookies

Article 4

Processing

As a data processor or controller you need to be able to know and tell what kind of processing activities are you exactly going to perform on the data. As a marketer you need to be able to communicate if you are for example executing profiling for behavioral targeting.

Processing means operations that are done to personal data. Automated or not. The GDPR specifies the following list as example. Processing activities are not limited to actions on this list.

Examples of processing activities according to the GDPR:

- ❑ collecting
- ❑ recording
- ❑ organizing
- ❑ structuring
- ❑ storing
- ❑ adapting
- ❑ alternating
- ❑ retrieving
- ❑ consulting
- ❑ using
- ❑ disclosing by transmission
- ❑ disseminating
- ❑ aligning
- ❑ combining
- ❑ restricting
- ❑ erasing
- ❑ destructing
- ❑ profiling

Article 4

Profiling

From advertising point of view, maybe the most interesting mean of processing is called profiling. Profiling means automated processes that evaluate or predict other personal apects of people from analysing existing data. In other words, analysing user behaviour and interests from browser cookies is considered processing of personal data and is subject to the regulation.

As an example the GDPR explicitly mentions analysing the following aspects as profiling.

Examples of profiled categories of data according to the GDPR:

- ❑ work performance
- ❑ economic situation
- ❑ health
- ❑ personal preferences
- ❑ interests
- ❑ reliability
- ❑ behavior
- ❑ location
- ❑ movements

Article 4

Controller or processor

When dealing with personal data you need to know are you a data controller or a data processor. Below a quick way of recognizing yourself as controller or processor.

Controllers and processors have a little bit different responsibilities so it is important to know where are you standing.

If you **determine the purposes and means** of the processing of personal data you are a data **controller**

If you **process personal data on behalf of the controller** you are a data **processor**

Article 4


Rules and obligations

5 commitments when processing personal data

A marketer will often find theirself in the place of controller and processor at the same time. No matter what you are doing with personal data, you need to live by these followinf 5 commitments. This will get you far with complying with the GDPR.

When working with personal data I pledge that:

I know exactly what am I collecting data for

I will only collect data that is relevant to my purposes

I will have accurate data and it is kept up to date

I will not store data by any longer time than necessary

I will keep the data secured

Article 5

Lawfulness of processing

For the processing to be lawful, one of the following must apply.

In marketing, the requirement for lawfulness will need to be filled with consent from the data subject.

Test of lawfulness

Data subject has given the consent of processing specified personal data

The performance of a contract with the data subject requires the use of personal data

Processing is necessary due to a legal obligation to the processor

Processing is necessary for the vital interests of the data subject

Article 6

Conditions of consent

One of the big changes the GDPR brings is the rules of the conditions of consent.
Getting consent will be more transparent with the new regulation.

The goal is that the data subject needs to have a fair chance of knowing what they are consenting for.

Before, it has been enough that the site mentions that using the site is consent but that doesn't apply with the GDPR. Consent must fill all the below mentioned requirements in order to be processed. This will change how data can be collected for ad targeting.

Conditions for consent

Not based on passiveness (silence, pre-ticked boxes etc.)

Demonstrable

Withdrawable

Given to each and every processing activities carried out

Parents' consent if the child is under 16 years old

Article 7-8

Special categories of personal data

Gathering information about certain attributes require **explicit consent**.

This means that processing of these attributes can't be done without specific consent to this particular attribute.

Examples of special categories of PII

- Biometric data
- Health
- Sexual preferences
- Sexual orientation
- Genetic data
- Racial/ethnic origin
- Political opinions
- Religious/philosophical beliefs
- Trade union membership

Article 9

Rights and responsibilities

Transparency

As the data subject a person has full transparency to their data. The data subject has the right to get all the details about the usage of their personal information at any time.

An important part of transparency is that if the processor can demonstrate that it can't identify the data subject from the data, it is freed from providing the information. Some data can be made untraceable to the source while still being very useful. In online marketing this is often the case. For example targeting ads based on online identifier. It's usually impossible for the buyer to identify the user behind the cookie. The untracable data is still subject to the regulation

While having the right for transparency, the data subject is not allowed to harrass the processors by asking for the information too frequently. In those cases the processor is allowed to charge a fee for the query or deny the request.

The following is a list of what information the data subject has the right to obtain

Processor needs to provide information about:

Who gathers the data?

What data is gathered?

What is the data used for?

Why is the data gathered?

Period of time the data have been gathered/will be gathered

Article 12-15

’The right to be forgotten’

The data subject has the right of data erasure or in other words ‘the right to be forgotten’.

This means that at any time the data subject can deny the use of their data. They also have a right of rectification in cases that the processor has outdated information about the data subject.

The erasure of the data needs to be done:

Upon request at any time

Automatically if the personal data is not used for its original purpose anymore

If consent is withdrawn

If personal data is unlawfully processed

Article 16-17

Data protection by design and default

Controllers and processors have the responsibility to have data protected by design and default.

Controllers and processors need to do their best to secure data protection. They need to consider data security on the foundation of their services.

Few ways to secure data protection

Risk assessment analysis

Pseudonymisation

Data minimisation

Safeguards

GDPR certifications

Article 25

Responsibilities as a processor

Mainly everything under the GDPR concerns both the data controller and processor. There are some additional responsibilities if you are working in the role of a data processor however.

An agency is a processor for example when using clients CRM-data in their marketing.

A processor working under the controllers authority has certain responsibilities. If the controller carries out the processing itself, it is responsible of these:

Processors guidelines

The processor can only process the controllers data by the controllers instructions

Full record of which processing activities has been carried out and what kind of categories of data has been processed.

Cooperation with the supervisory authority (Viestintävirasto in Finland)

Article 28-31

Administrative responsibilities

In addition to the rules of how to process and store data, the controllers and processors have certain administrative responsibilities.

Supervisory authority in Finland is the Finnish Communications Regulatory Authority (Viestintävirasto).

These are the most essential administrative responsibilities when working with personal data:

Most essential administrative responsibilities

Notifying the supervisory authority of possible data breaches

Communicating the data breach to the data subject

GDPR certifications for the staff

Nominating a Data Protection Officer

- The DPO makes sure the organization is following the GDPR.
- Can be a specifically trained staff member and can have other duties

Data protection impact assessment

- A risk assessment for your processing activities. Demanded if there is a risk of data breach

Article 28-42

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This handbook is made as part of a bachelor's thesis in Haaga-Helia University of Applied Sciences, Degree Programme of Business Administration.