Ad Age **CONTENT STRATEGY STUDIO**

CROSS-DEVICE ADVERTISING:

criteo. How to Navigate Mobile Marketing's Next Big Opportunity

Executive Summary:

Cross-device advertising is here. Are you prepared?

Of the world's 7 billion people, 4.55 billion will use mobile phones this year, according to eMarketer. Tablet use is also on the rise, with 147.2 million U.S. consumers using tablets in 2014, up from 132.2 million in 2013. In fact, worldwide sales of all devices—tablets, PCs and smartphones—will hit 2.4 billion units this year, according to a recent Gartner report. More than a third of U.S. consumers now own one of each mobile device—laptop, smartphone and tablet—according to the Deloitte Digital Democracy Survey.

As consumers are increasingly shopping and accessing content on multiple platforms—mobile, laptops and tablets—their brand interactions are changing as well. Consumers want a consistent experience when they move from device to device. In fact, some say they will stop interacting with a brand if the experience varies too much across devices. Overall, consumers view a brand's websites, apps, the retail store and ads as part of the same experience. This highlights the growing need for marketers to have an effective cross-device strategy to be able to meet customer expectations and to optimize their ROI on advertising.

The benefits of a cross-device strategy can be great, but marketers are finding that cross-device advertising is complicated. At the most basic level, some marketers lack proficiency across marketing platforms, and—from a planning perspective—their campaigns remain siloed. A lack of tracking and analytics also clouds the picture.

For advertisers, an exact match solution—one that will help them figure out if the person who saw their ad on a tablet is the same one who made a purchase on their PC later that day—will be critical to cross-device success. While exact match options are still a work in progress, they are coming soon. In the meantime—and in preparation for moving to an exact match solution—marketers can take the following specific steps to help them get closer to their final goal:

‣ Start measuring and documenting how customers are consuming your ads and content.
‣ Integrate cross-device targeting to your multichannel advertising strategy.
‣ Find the right partners to help you do cross-device advertising using exact match.
‣ Be transparent about the data you collect, and give consumers a clear way to opt out.

This white paper will address a number of areas of concern to marketers looking to successfully create and execute cross-device advertising strategies that work:

The Growing Importance of Cross-device Advertising

Technology has changed the retail world, forever altering the way consumers research and shop. For instance, "webrooming"—the process of shopping and researching online before heading to the store to complete a purchase—is big business. Forrester Research says U.S. revenues from webrooming will pass $1.8 trillion by 2017. At the same time, pure online shopping will top the $370 billion mark in the U.S. that year, taking into account a wide variety of shopping methods—on desktops, smartphones and tablets.

Worldwide, 97% of shoppers are making purchases via a PC, according to PricewaterhouseCoopers. Yet cross-device shopping is expanding, with nearly four in 10 consumers saying they are shopping on tablets at some point during the year, while more than four in 10 say they are shopping on smartphones. Industry watcher comScore paints a similar picture. A study of U.S. digital media time spent by platform found that almost 60% of people report multiplatform use. And mobile usage now accounts for a much higher share than desktop in terms of consumer digital media time spent in the U.S. (Figure 1). In addition, it's not uncommon for people to use more than one platform at the same time—for instance, using a tablet while watching television.

While these statistics show a significant opportunity for online advertisers, which can now reach consumers on a variety of devices, it also highlights a challenge: As shoppers do their research on whatever platform is handy, it becomes more difficult for marketers to identify them as they fluidly move between devices. Marketers can't provide a consistent experience if they don't know how consumers are interacting across devices and the paths they take from consideration to sale. This can lead to wasted ad spending, especially when inconsistent or inaccurate data is the culprit. When handled the wrong way, integrated campaigns either fail to target an individual across devices or they overexpose a user because one individual is being viewed as multiple users.

SHARE OF U.S. DIGITAL MEDIA TIME SPENT BY PLATFORM **Figure 1**
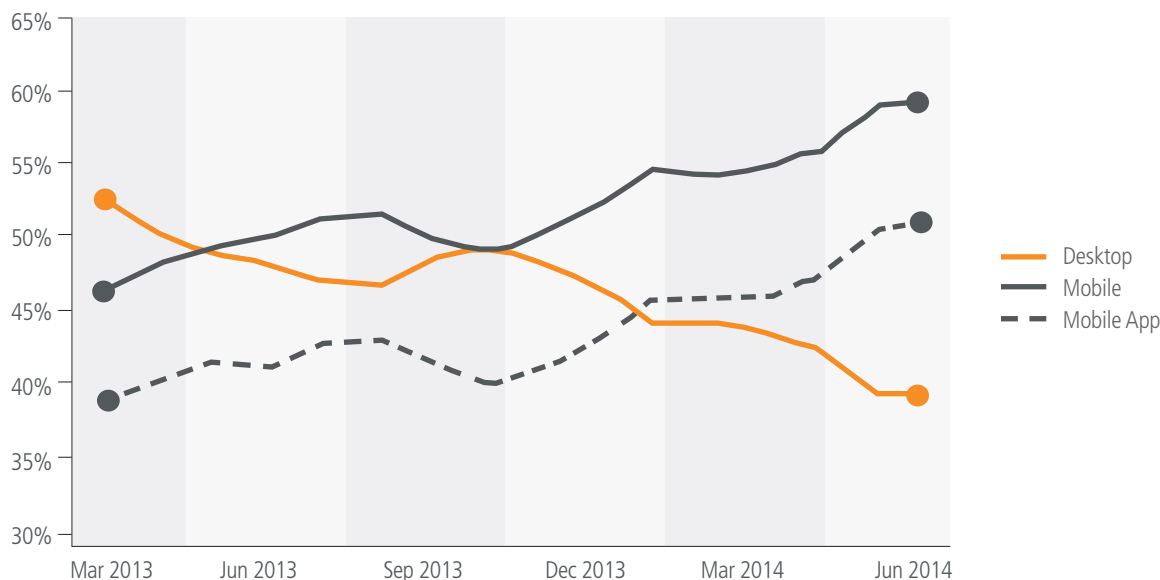
Source: comScore Media Metrix Mutiplatform & Mobile Metrix, U.S., March 2013 - June 2014
Note: Mobile includes mobile app

"You've got people using their work PCs during the day and, in the evening, switching to their tablets and smartphones," says Jonathan Wolf, chief product officer at Criteo. "Advertisers realize this, and now they want a way to definitively know that the person who was browsing shoes at lunchtime on their PC and then was looking for more details on their phone on the way home is the same person who went into the store the next day and purchased them."

Indeed, that's the goal: tying browsing behaviors across multiple devices to a single user. And it's a strategy that 59% of all senior-level marketers and agency decision-makers say they plan to use this year, according to personalization platform Conversant. But before they can succeed in this quest, advertisers must be able to effectively analyze browsing behavior across multiple devices. Just as important, they need to use the information they glean from usage patterns to give consumers a way to find and purchase exactly what they need when they are at specific points of the sales funnel.

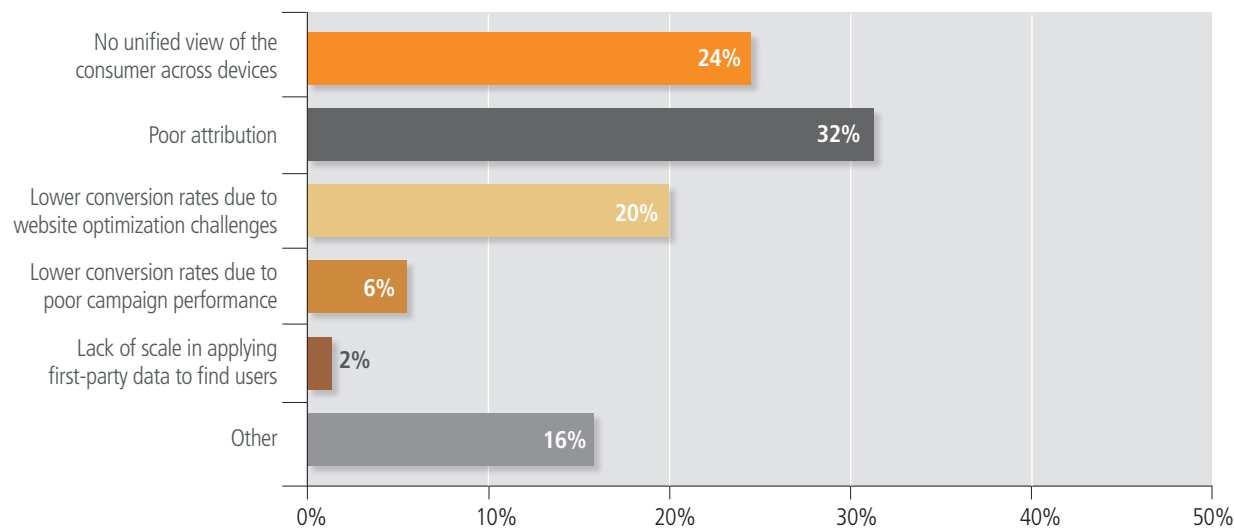## The Cross-device Challenge: Connecting the Dots

The challenges for advertisers in this cross-device world are many, starting with accurately analyzing user browsing behavior across devices. Another factor here is the issue of attribution and measuring return on investment—how can an advertiser measure true returns (and determine where spending is wasted) from desktop advertising, for example, if a large number of customers view the ads on desktops but buy later on their mobile devices?

According to the results of a survey conducted by Criteo in partnership with Digiday, the majority of brands and advertising agencies believe poor attribution, no unified view of consumers across devices and low conversion rates to be the top three reasons restricting the growth of mobile advertising (Figure 2). Adding to these is the growing issue of consumer privacy. Obviously, the problems are complex—but not insurmountable.

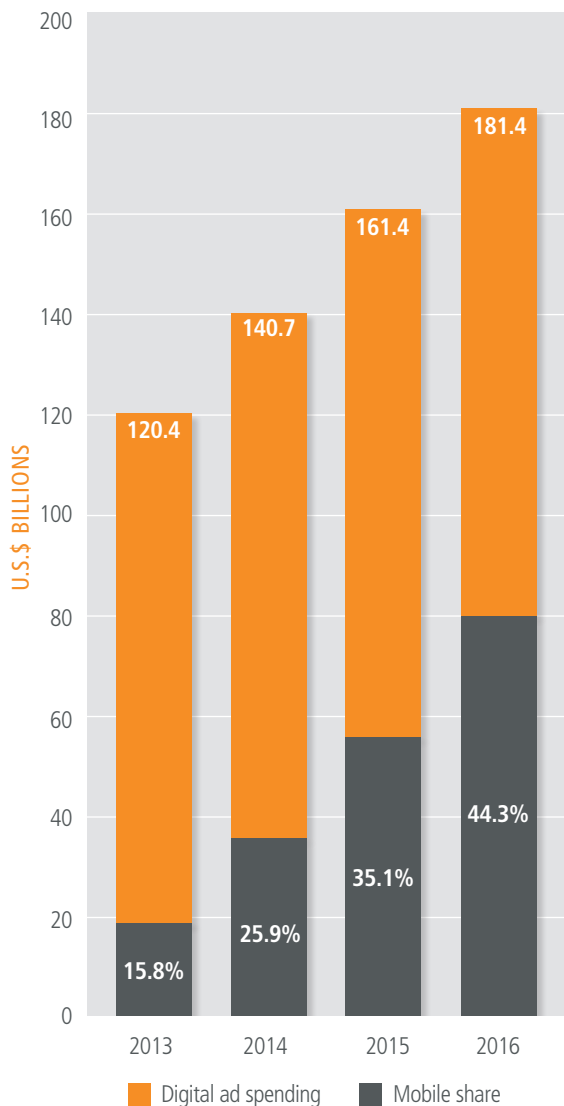**MOBILE SPENDING BARRIERS**   **Figure 2**

Which of the following is the biggest barrier to increasing your spending on performance-based mobile advertising?

Barrier	Percentage
No unified view of the consumer across devices	24%
Poor attribution	32%
Lower conversion rates due to website optimization challenges	20%
Lower conversion rates due to poor campaign performance	6%
Lack of scale in applying first-party data to find users	2%
Other	16%

Source: Digiday and Criteo survey of retail executives and ad agencies, July 2014

DIGITAL AD SPENDING AND MOBILE SHARE, WORLDWIDE　Figure 3

U.S.$ BILLIONS

- 2013: 120.4 / 15.8%
- 2014: 140.7 / 25.9%
- 2015: 161.4 / 35.1%
- 2016: 181.4 / 44.3%

■ Digital ad spending　■ Mobile share

Source: eMarketer

The need for cross-device solutions is critical: Digital ad spending is expected to rise almost 17% from 2013 to 2014, with ads being served to Internet-connected devices—including desktop and laptop computers, mobile phones and tablets—topping the $140.7 billion mark by year-end, according to research firm eMarketer's September 2014 estimates of worldwide paid media spending (Figure 3). The firm says that will jump to $161.4 billion and $181.4 billion in 2015 and 2016, respectively.

Mobile's share of digital ad spending is expected to grow rapidly—from 15.8% in 2013 to 25.9% in 2014, and reach up to 44.3% by 2016.

Mobile in particular is extremely important to cross-device advertising. In 2013, time spent with digital media among U.S. adults surpassed time spent with TV for the first time (Figure 4). Mobile is the key driver to this shift, accounting for almost half of total time spent by consumers on digital media now. This year, that trend will continue, as time spent with mobile devices continues to grow much faster than usage of all other media. Because of this, it is imperative that advertisers consider the mobile platform as central to their cross-device advertising strategy and find ways to integrate what they are doing on desktop and offline with their mobile strategies.

The billions of dollars being spent on digital advertising also mean that advertisers are keen to find better ways of measuring and improving ROI, and concerned about cross-device advertising challenges. If marketers can't measure true ROI, they may be throwing advertising dollars toward platforms and networks that may not

WHY MARKETERS NEED CROSS-DEVICE MEASUREMENT

"Marketers have an appetite to measure performance and ultimately optimize their campaigns. To succeed, we need to tie user events across channels and devices and connect the marketer with the conversion event that really matters—wherever that happens to be: in-store, on their website or on mobile."

Larry Weyer, VP-product management, *Yahoo*

SHARE OF TIME SPENT PER DAY WITH MAJOR MEDIA BY U.S. ADULTS, 2010-2014

% of total

Figure 4

	2010	2011	2012	2013	2014
Digital	**29.6%**	**33.8%**	**38.5%**	**43.4%**	**47.1%**
Mobile (nonvoice)	3.7%	7.1%	13.4%	19.2%	23.3%
Online*	22.0%	22.6%	20.7%	19.2%	18.0%
Other	3.9%	4.1%	4.3%	5.0%	5.9%
TV	**40.9%**	**40.4%**	**39.2%**	**37.5%**	**36.5%**
Radio	**14.9%**	**13.9%**	**13.0%**	**11.9%**	**10.9%**
Print**	**7.7%**	**6.5%**	**5.4%**	**4.4%**	**3.5%**
Magazines	4.6%	3.8%	3.1%	2.5%	1.9%
Newspapers	3.1%	2.7%	2.3%	1.9%	1.6%
Other	**7.0%**	**5.5%**	**4.0%**	**2.8%**	**1.9%**
Total (hrs:mins)	10:46	11:18	11:49	12:03	12:14

Note: Ages 18+; time spent with each medium includes all time spent with that medium, regardless of multitasking; for example, 1 hour of multitasking online while watching TV is counted as 1 hour for TV and 1 hour for online; numbers may not add up to 100% due to rounding. *Includes all Internet activities on desktop and laptop computers. **Offline reading only

Source: eMarketer, April 2014

work for them. For instance, unless they can accurately track their customers and prospects across devices and platforms, they may not realize that their ads actually helped with conversion. They can't tell how many customers viewed ads on the desktop but bought the product or service later from their mobile phone or on a tablet.

Both exact match and implied match solutions can help in tracking customers but exact match delivers significantly higher accuracy. "Using an exact match method for cross-device campaigns provides great re-sults for advertisers and drastically improves ROI," says Jason Morse, VP-mobile product at Criteo.

Advertisers not using exact match and implied match also have little to no visibility into what mix of advertising platforms works best for them. They may be exposing users on one device who have already made purchases on another or, even worse, overexposing users who are being tracked with multiple cookies.

In the latter case, advertisers may think they are targeting multiple people, but in reality they are bombarding the same person with the same message

USING EXACT MATCH TO SOLVE PROBLEMS

"Because advertisers have a true unified view of consumers across devices, exact match helps solve the two main challenges that have restricted the growth of mobile advertising for so long—measurability and accountability."

—Jason Morse, VP-mobile product, *Criteo*

A Look at Cross-device Advertising Options

Figure 5

1. EXACT MATCH
The much preferred method

▶ Persistent identifier used to positively match.

▶ Seamlessly supports opt-out / privacy guidelines.

▶ Challenge 1: Build volume.

▶ Challenge 2: Must ensure no personally identifiable information.

Source: Criteo

2. IMPLIED MATCH

▶ Machine learning model uses device characteristics to estimate a probability that two devices are the same, or used by the same person.

▶ By definition creates false positives, wrongly matching two different people.

▶ Precision varies, ranging from 40-75%. This radically reduces performance, and therefore ROI.

▶ Challenging opt-out management.

Source: Criteo

across platforms and devices. This can create advertising fatigue among those users, potentially pushing them into a competitor's arms.

But when it's done right—when multiplatform advertising succeeds—marketers can see tremendous boosts in revenue.

Technology and Tracking: Volume vs. Accuracy

Cross-device advertising can be done using two methods: exact match and implied match (Figure 5). The more accurate option is exact match. Exact match is based on matching unique information associated with a user across devices. Examples of existing, more traditional methods of exact user match include credit card numbers, store loyalty cards, email addresses, mobile phone numbers and home addresses. While exact match is preferred, it isn't in wide use because it can't be used for all consumers or platforms. The alternative to exact match is implied match, a methodology that has a far lower degree of accuracy, using a "best guess" approach and also raising privacy concerns if not done well.

Facebook, Yahoo, Google's Gmail and apps that require single sign-on are some of the more popular platforms and methodologies—and examples of exact match—that marketers are using to be sure the prospects being targeted are actually who they are supposed to be.

"This is an ask that we hear from marketers a lot," says Larry Weyer, VP-product management at Yahoo. "We want to help marketers understand the effectiveness of their display, mobile, video, search and native advertising reaching their target audience. Once a user is logged in, we are able to understand their actions across desktop to mobile." This requires a login, though, something that not every consumer is going to do as they move from device to device.

Online retailer PriceMinister enjoys a similar benefit from its sign-on—customers log in to a desktop site and mobile app, bringing transparency to their movements.

Marieke Flament
Senior Director of Marketing, EMEA
Hotels.com

Olivier Mathiot
Co-founder and CEO
PriceMinister-Rakuten

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"Once the customer is logged in, we can recognize them from one device to the other and can understand their shopping interests based on where they have come from and where they are going," says Olivier Mathiot, co-founder and CEO of PriceMinister-Rakuten.

Loyalty clubs are another option, and one that works for online travel site Hotels.com. "We have a loyalty program called Welcome Rewards that [customers] log into and book their nights with. If they are logged in to their PC and then go to our mobile app, we can provide the best customer journey," says Marieke Flament, senior director of marketing, EMEA, Hotels.com.

In Hotels.com's case, the company knows that 25% of its bookings are going through mobile devices, and 60% of those bookings are for the current or next day's stay. Using this, the company can better target its customers by offering last-minute deals in its ads, Ms. Flament says.

However, all of these options have limitations. They work only for current customers and only if those customers actually log in. They don't take into account prospects or those people who browse and shop without bothering to go to the retailer's site or app.

Implied match, on the other hand, has a number of issues. The biggest drawback to implied match is that no lasting identifier can be placed on every platform and device, and the identifiers that are available can be

placed only by household, not down to who is viewing a particular ad.

A good example of implied match is assuming that someone with the same IP address and who always browses from an iPad is a unique user. However, this might not be true because two or more family members might be using iPads from the same location with the same IP address. If, however, the user was logging in with the same email ID or Facebook account or other unique login details, it's possible to say with almost certainty that the person is a unique user.

Also, there is a potential privacy issue with implied match, because ads are served based on the content accessed by the user and many won't like it, if others start to see ads on content they accessed. This is a big drawback of implied match, as the accuracy can vary widely and in many instances there's only a 50% chance of reaching the right user.

Overcoming the Barriers: Exact Match Coming Soon

Advertisers are truly at a crossroads. The good news is that e-commerce continues its growth, and mobile is a big part of that. Because of this opportunity and the implied-match limitations, some publishers, advertisers and technology companies are working toward creating a cross-device exact match tracking option—one that is more accurate and embraces all privacy rules, regulations and best practices. Figuring out how to do that, though, is not easy.

"Right now, there are a series of suboptimal solutions out there and no one in the market, really, who

can say they have an exact-match solution that really works for everyone," says Criteo's Mr. Wolf, who firmly believes in the exact match approach. "Clearly, there is a big space right now for advertising technology companies to come in and solve this problem for everyone involved."

Any solution to cross-device advertising must take into account a variety of criteria, says Andrew Lipsman, VP-marketing and insights at comScore. It should look at audiences in an unduplicated way, give advertisers and publishers a method to reach audiences over a longer period of time and eliminate the fear of disruption that many may be feeling, he says.

"The first reaction when looking at this issue is usually apprehension and fear. Yes, there are going to be some challenges as you navigate the transition [from siloed platforms to integrated marketing]; but there are incredible opportunities for everyone involved," Mr. Lipsman says.

"For instance, advertisers may be worried about how costly an exact-match solution is going to be, but the bigger question is how much it will cost you if you don't have such a solution," Mr. Wolf says.

"The answer is that advertising is going to become very costly as we continue to see the rapid growth of fragmentation," he says. "You may think you're doing all this targeted messaging but, if you can't track it cross-device, you aren't going to be able to tell if something is profitable."

As an example, an advertiser might think its search spend isn't working because sales are happening on other devices, but in reality the customer's first click was on a mobile search ad—the very ad the advertiser thinks is not delivering sales.

THE NEED FOR TRACKING ACCURACY

"If your accuracy is only 50%, half of your advertising budget is being wasted. When accuracy falls, it also means an ad is not correctly personalized and you're not doing your best for your customers."

—Jonathan Wolf, chief product officer, *Criteo*

Best Practices:
Finding What Works

Until a company comes out with a robust cross-device advertising solution that works, advertisers can still make changes internally and to their ad strategies to have some positive impact today and to be better prepared for the transition once it arrives. At the very least, marketers should understand and accept that advertising cross-device and cross-channel is more effective than operating across a single channel or device.

They must also realize that analytics—their own and those from publishers, partners and agencies—will take center stage. Analytics will help everyone gain the ability to slice and dice by channel and understand what each platform and channel brings to the table. Analytics will also show interdependencies between platforms and help everyone optimize their campaigns down to the unique user.

1. Measure and document how customers are consuming your ads and content.
Make sure you are collecting the right data from the customers and prospects who are already engaging with you—those who are logging in and those who have made a purchase linked to a long-lasting identifier such as a credit card. You should also be tracking your marketing emails, seeing on which devices those users are opening your messages and what they are clicking through on.

If you don't already have reporting capabilities around your existing marketing and advertising efforts, you may want to add them internally or look to cloud-based partners to make them available. Any partners you work with going forward will be able to give you better results and more exact matches if they can marry your data with their own data as well as data collected from trusted industry sources.

2. Integrate cross-device targeting to your multichannel advertising strategy.
Pundits and marketers have been touting the benefits of an integrated campaign for years, suggesting that display, search and traditional advertising be planned for and executed by one unified team. So far, this hasn't happened on a wide scale, but it has to happen now—to be able to fully realize the benefits from cross-device advertising and especially as multidevice usage continues to soar, says Anna Bager, VP-general manager of the Interactive Advertising Bureau Mobile Marketing Center of Excellence. Experts also suggest that it's important to have a unified team that can plan advertising across different devices—including spending—and make sure every campaign takes into account the entire advertising ecosystem.

3. Determine your goals to decide which measurement strategy will work best.
Creating a cross-device advertising program starts with defining your goals: Who do you want to reach? How do you want to reach them? What is your budget? Determining the answers to key questions such as these will help you decide whether to go with exact match or implied match. Implied match offers volume but can compromise accuracy on who the ads are actually reaching and raises privacy concerns. Exact match, while challenging with a large customer base, offers accuracy and a more secure method for reaching and measuring the target audience. Making the right decision at the beginning will help ensure that you reach your desired target.

4. Find the right partners (who can help you to do exact match).
The majority of organizations still don't have the

expertise or tools available to create and execute a multichannel, cross-device advertising strategy. However, many companies do have the capabilities to build a cross-device advertising solution and have been working on it. It is expected that some of these companies will announce their cross-device advertising solutions in the next six to 12 months. The IAB this year launched an initiative called "Make Mobile Work" that counsels its members to look to outside sources such as agencies and technology providers to help them achieve cross-device proficiency. "Advertisers need to start asking agencies the right questions and buying on the right screens," Ms. Bager says. "They need to be smart about it, choose the right partners and spend some money."

5. Be transparent about what data you collect, and give consumers a clear way to opt out.
At the heart of every campaign is the customer or prospect an advertiser is looking to reach. Those people will be more comfortable and willing to share their information—as well as their browsing and multichannel usage habits—if they understand what kind of information related to them is being collected and why. As marketers, companies must understand what consumers' expectations and concerns are about the ads they receive from them.

It's also a good idea to bring your entire marketing team into the discussion about privacy, says Estelle Werth, Criteo's global privacy officer. "It's important to note that I report to the chief product officer and not to the legal team. This is significant because it facilitates the interaction between our product and our privacy teams. We're working together on a day-to-day basis, and that helps them in their quest to develop products that have a privacy-by-design principle."

6. Take design into account from the start.
Advertisers should consider the fact that how they present their ads cross-platform is just as important as how they are displayed on those platforms. Hotels.com is an online-only travel provider, so it realized early on

that everything it does—from Web interfaces to online ads to apps—must have the same look and feel so the customer has a cohesive journey, Hotels.com's Ms. Flament says.

"One of the things that has been very important to us is adaptive design," she says. "We look at it as a holistic strategy. We make it a priority that everything we create is going to work on their screen—whatever screen that happens to be."

7. Invest in good talent.
Creating and executing a smart advertising strategy requires smart people, so it's crucial to hire the right talent to get the job done. U.S.-based retailer HSN says 15% of its sales in 2014 will happen on smartphones and tablets. Figuring out how to reach those shoppers with the marketing messages that will turn them into buyers is an important goal, says HSN President Bill Brand, who calls this idea "boundaryless retail." As such, he's looking to his staff to help find the tools, partners and strategies that will make this happen.

"I just hired a senior vice president of strategy and analytics. We always had a lot of information but it was operating a bit in a silo. Now, we're looking to get that one view and one truth," Mr. Brand says. Once he and his team know how people are browsing and what they are looking for, he says HSN can create better campaigns and reach its targets more quickly.

Conclusion
Cross-device usage is growing, and marketers that want to effectively and efficiently target consumers will work to stay on top of this changing opportunity. While these best practices may not work for every organization right away, these strategies can help bring advertisers closer to their goal: delivering the right ads, at the right time and to the right user in a bid to improve conversion.

Advertisers should note that cross-device advertising is going to make that happen, and exact match is the solution that will make it possible.

Privacy: It's a Matter of Trust

A recent Harris Poll survey found that 91% of Americans are concerned about online privacy and 88% think online privacy will be one of their biggest concerns over the next decade. The economic value of personalized advertising supports free Internet: free content and services. It is within that context that Estelle Werth, Criteo's global privacy officer, discussed important privacy challenges to consider when establishing a cross-platform ad solution.

Q:

What are the most important privacy-related issues right now?

Ms. Werth: Performance-based advertising is user-centric, so our main challenge today is to win trust in the ecosystem. We believe that transparency helps people understand more and creates confidence. To make ads extremely relevant to users, we need knowledge and understanding of users' browsing behavior. To create these ads, we may use different tracking methods on desktop or mobile devices to single out users without identifying them, always focusing on the user's browsing behavior.

So for us, it's key to explain in a user-friendly way what we are doing, how our services work and that what matters is their browsing behavior and not the identification of the users themselves. It is also key to provide appropriate means to users to express their choice.

Q:

Are there specific privacy issues related to cross-device advertising?

Ms. Werth: There are indeed new challenges with cross-device advertising. The main privacy challenge is to offer control tools that are aligned with the service proposed. Basically, if we match devices and serve ads based on the browsing behavior on one device using data from another device, then we should also offer tools to users that allow them to opt out from receiving targeted ads on multiple devices.

Q:

How big a challenge is it to analyze consumer data anonymously and at the same time deliver relevant personalized ads?

Ms. Werth: To serve relevant ads, we need deep knowledge and understanding of users' online experiences. Clearly the more accurate browsing data we have, the more personalized the ad can be. Data also needs to be very fresh and correspond to users' intent at the right moment. For example, if a woman shows an interest in buying a dress, the chances are very unlikely that she will still be interested in buying that same dress one year later. We need to serve the right ad at the right moment to that user, since she is much more likely to be interested in that dress if we serve the ad a few hours later or after she checks for that dress on a website.

The privacy issue—and our challenge—here is to be very transparent, to explain to users how we operate and to make sure that they understand that what matters is not their identity but their browsing behavior. To address these kinds of questions we are as user-friendly and precise as possible in our disclosures through the Ad Choices icon integrated into all our ads or through our privacy policy.

In these disclosures, we are answering questions like, "How long is my data retained? For what purpose? Is the data allowing my identification or not?" Basically what the user really wants to know is whether Criteo can identify him by using his browsing behavior; and we need

to let him know what we are doing with that data. These responses allow users to make relevant choices.

Q:

How can ad-tech companies such as Criteo work with advertisers to support their privacy policies?

Ms. Werth: First and foremost, we train our sales teams to make sure they have deep knowledge of our privacy policies and ask them to share their expertise with all of our advertisers. In the end it is advertisers that first engage with users. They, in turn, need to be transparent to make sure users have the final choice. Legally speaking, we also make sure that advertisers commit to using appropriate notice and choice, and include those provisions providing for information and choice in their privacy policies.

We do have suggested wording for them to include in their policies if needed, and our legal and privacy teams are always available to explain how we operate, explain what really matters and what's key to include in their privacy policy.

Q:

What do marketers need to know about consumer privacy that they may not be thinking about?

Ms. Werth: It is important to remind them that users who don't trust a company don't use its services. Applying privacy principles—transparency and choice—serves the company's interest.

The purpose of transparency is to empower users to make relevant choices. It's the user who decides the online experience he wants. His choice, through control mechanisms, is based on his understanding of services and data-management practices. The more transparent marketers will be, the more trust they will engender.

Q:

Is the industry sufficiently well-organized to respond to users' needs?

Ms. Werth: It is indeed an industry effort. As an industry, we need to expand knowledge of self-regulatory principles. We work very closely with self-regulatory associations such as the Network Advertising Initiative. The self-regulatory principles were designed to be technologically agnostic and flexible. They aim to allow users to exercise control over collection and use of data for personalized advertising.

We try to promote the initiative of these self-regulatory associations by donating impressions to them so that they can themselves promote their self-regulatory principles. This will help educate users so they understand that they do have control mechanisms at their disposal that allow them to opt out from receiving ads from different third-party vendors.

Also, these self-regulatory principles need to be applied to any new technology or to any solution in our evolving market. I'm sure that technical innovations will always bring new challenges, but they also can lead to innovative solutions that are a benefit to the whole market and to users. Going forward, the rule should be priority by design with a focus on user interest.

WHY PRIVACY PRINCIPLES MATTER

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