



Building Privacy-by-Design at Criteo.



JUNE 2016

Executive Overview

With the soaring rise of smartphones and consumer technology services, safeguarding data privacy and security to maintain the trust of consumers is at the forefront of sustainable growth and continued innovation. At the same time, consumers expect easy and relevant personalized experiences with brands, which in turn requires the use of marketing data.

Balancing the two forces adds complexity to the task of protecting data privacy, but it does not require a tradeoff. In this paper, we discuss the core components to Criteo's approach and how we shape the industry's approach to consumer privacy.

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We continually innovate to safeguard privacy and security while responding to consumer expectations on transparency and choice.

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- Estelle Werth, Global Privacy Officer at Criteo & Secretary of NAI Board



Building trust as a core business principle

Building trust with consumers and between consumers and a brand is a core business principle for Criteo. Every day, brands come to Criteo to drive sales for their businesses. When brands choose Criteo, they are trusting us to protect and treat their information with respect. To that end, we must deliver relevant ads that both enhance the online experience and provide consumers with transparency and control over the ads they receive.

To design products and features that proactively protect consumer privacy, our Global Privacy Officer, Estelle Werth, and her dedicated team is deeply embedded within the product organization. This structure allows us to establish a culture that safeguards consumer privacy as an integral part of product development and not an afterthought. Every product and feature is thoroughly tested for privacy and security prior to commercial launch, and internal compliance tests are conducted on a daily basis.

Transparency and control as key consumer experiences

The protection of privacy through transparency and control is a core component of the consumer experience. Our approach is firmly rooted in respect for the consumer and the belief that consumers should always be able to understand the choices they make and have the ability to control their own browsing experiences.

As a leader in the space, we've established many firsts that have become standards for the industry. For example, the Criteo ad choices icon was one of the first in the industry to give consumers direct visibility into the mechanics of our retargeting methods.

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Criteo has gone the extra mile to make sure its technology supports choices that make sense to consumers.

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- Jules Polonestsky, CEO of Future of Privacy Forum

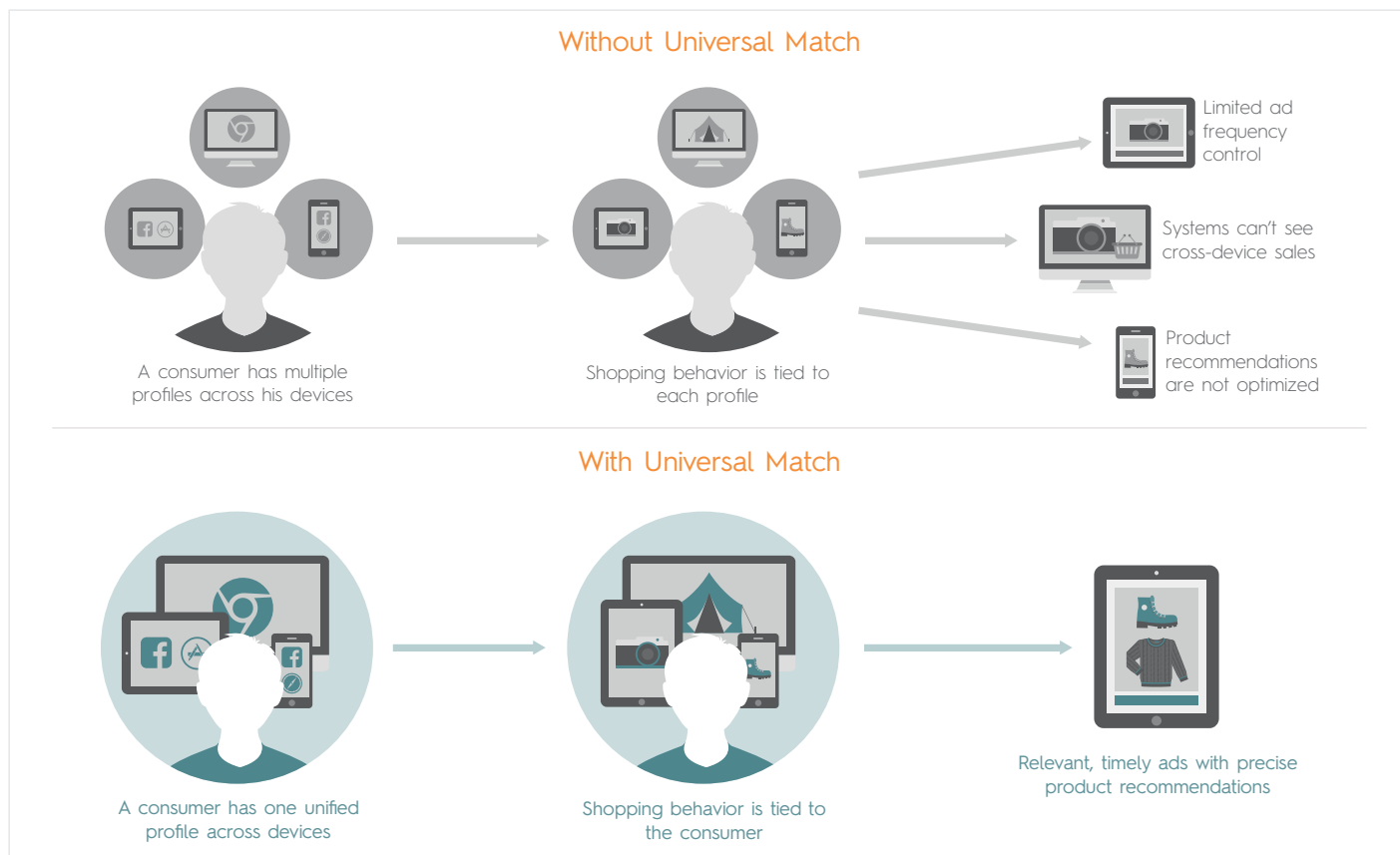
Our practice enabled a choice mechanism where the consumer could make an informed decision to delete his or her browsing behavior on any given website. We were also one of the first companies to implement a user-friendly and simple-to-understand privacy policy, giving consumers the ability to drill down to a level of granularity at their disposal.

The success of our initiatives on privacy as a core component of the consumer experience heavily relies on supporting our clients' relationships with their customers. We always ask that clients update their privacy policies to inform customers about the use of Criteo technology and include a link to the Criteo Privacy Policy page which allows them to learn more or opt-out.

Delivering a unified cross-device experience while protecting privacy

At Criteo, we continue to develop more sophisticated and intelligent solutions with uncompromising privacy standards so that our clients always deliver the most relevant and positive consumer experiences. Our newly released Universal Match feature is a perfect example.

Today, consumers use multiple browsing environments on their path to purchase. However, many brands still struggle to uniquely identify consumers and tailor ad messaging beyond independent ecosystems, which represent only a fraction of the full path to purchase. To address this problem, Criteo released Universal Match, a unique process for linking and understanding real-time purchase intent across devices, browsers and apps throughout a consumer's full path to purchase. Through Universal Match, Criteo Dynamic Retargeting effectively tailors product recommendations, ad creative and bidding for each person, so consumers receive coherent brand experiences with real-time relevance and context as they shift from one browsing environment to another.



Universal Match is designed such that no identifying personal information ever needs to be stored by Criteo. Instead, it uses only non-identifiable keys to Criteo, which are hashed versions of a consumers' email address or CRM id. Hashing encrypts personal data into a jumble of numbers and letters, and is completed prior to storage by Criteo. Once complete, Criteo uses non-identifiable keys to deliver real-time relevant ads without the ability to identify any personal information of the consumer from the hashed key.

CRM ids are treated in the same way and are hashed to exclude sensitive or identifying information. Using only this key that is non-identifiable by Criteo, our advertisers are able to deliver ads that sustain a relevant experience regardless of device or browsing environment.

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The NAI commends Criteo's commitment to solving the cross-device challenge in a way that respects and protects consumer privacy.

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- Leigh M. Freund, President and CEO of NAI

We have taken equal care of our privacy policy with the launch of Universal Match. On our user-friendly [Privacy Policy](#) page, consumers have full transparency and granular control into the linking technology we use. We were one of the first companies to offer comprehensive and granular privacy controls for cross-device advertising, allowing consumers to opt-out of receiving Criteo ads in all linked environments with the click of a button or only on the current browser when relevant. "Consumer choices need to be effective to be meaningful," says Jules Polonetsky, CEO of the Future of Privacy Forum, "Criteo has gone the extra mile to make sure its technology supports choices that make sense to consumers."

Globally speaking, we have applied the strictest principles to our global privacy policy for Universal Match and our overall performance marketing suite. Criteo operates in global markets including the most privacy conscious European countries. We have used these mature privacy policies and infrastructures to inform strategy in markets with developing PII standards and definitions. We also utilize industry-standard security measures, which include the use of firewalls and encryption.

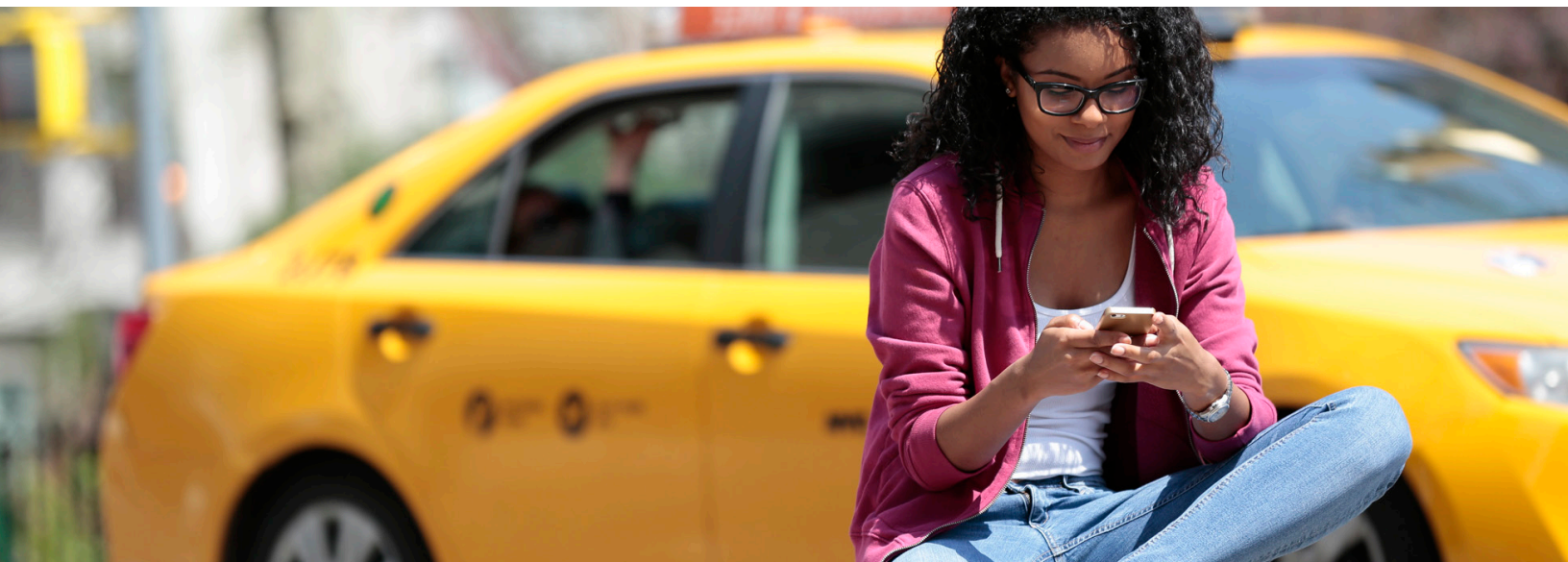
Any technical data linked to non-identifiable keys expire after 13 months from the date of collection. "The NAI commends Criteo's commitment to solving the cross-device challenge in a way that respects and protects consumer privacy. Their empowerment of consumers to make informed choices regarding his/her cross-device experience and their user friendly privacy policy are great examples of a thoughtful and innovative approach to consumer transparency and choice," says Leigh M. Freund, President and CEO of Network Advertising Initiative.

Conclusion

Criteo is one of the most successful performance marketing providers in the world. The advances of our clients rest on maintaining absolute trust in the consumer-brand relationship and on treating consumers as data owners and active participants in the digital data transaction.

As a company built on maintaining consumer trust and delivering relevance, Criteo must stay ahead of the privacy curve and take a leadership role in shaping a global approach to consumer privacy. We are extremely proud of our excellent reputation among consumers, brands and publishers as a company committed to positive and secure online experiences. From an industry perspective, we are also very proud of the work of our Global Privacy Officer, Estelle Werth, in her role as Secretary for the National Advertising Initiative Board in crafting policies and guidelines that ensure responsible data collection and usage practices for new technology offerings across the industry.

Giving consumers transparency and control is good for every participant in the digital marketplace. We believe that all consumers have a right to understand why and how they are receiving each ad in order to make informed decisions about their browsing experiences. When brands choose Criteo to drive sales for their businesses, we know they are entrusting us to protect and treat their information with respect. Our approach guides every product and feature developed, so we can continue to proactively deliver a relevant and impactful brand experience - one that fosters sustainable growth, innovation, and consumer loyalty - without sacrificing privacy.



About Criteo

Criteo (NASDAQ: CRTO) delivers personalized performance marketing at an extensive scale. Measuring return on post-click sales, Criteo makes ROI transparent and easy to measure. Criteo has 2,000 employees in 31 offices across the Americas, EMEA and Asia-Pacific, serving 11,000 advertisers worldwide and with direct relationships with 16,000 publishers.

For more information, please visit www.criteo.com