

## **IAB EU Transparent Consent Framework (TCF)**

Content Ignite intends to process data for the following TCF purposes:

Purpose 2: Select Basic Ads: To select relevant advertising based on limited data.

Purpose 7: Measure Ad Performance: To measure the effectiveness of advertising campaigns.

Purpose 8: Apply Market Research to Generate Audience Insights: To gain insights into user preferences and behavior.

Purpose 9: Develop and Improve Products: To improve products and services based on user data.

Purpose 10: Ensure Security, Prevent Fraud, and Debug: To protect systems and users from security threats and fraudulent activity.

### **Overall,**

**Benefits:** The processing ensures that Content Ignite has sufficient information about campaign delivery, performance to make the necessary optimisation decisions about ad spend and publisher inventory.

**Necessity:** The processing is necessary to achieve the legitimate interest. The legitimate interest for these purposes is to improve user experience, optimise advertising, and protect systems and users. The data processed is limited to what is necessary for the specific purpose.

**Proportionality:** The processing is proportionate to the legitimate interest. The benefits of the processing outweigh the potential risks to individuals.

### **Purpose 2: Select Basic Ads:**

To deliver relevant advertising to users based on limited data points such as device type, browser, and general location.

**Reasonableness:** This processing is necessary to ensure that advertising is relevant to users, improving the user experience and the effectiveness of advertising campaigns.

**Balancing Test:** The processing is proportionate to the legitimate interest, as it involves limited data processing and does not result in significant privacy intrusion.

**Purpose 7: Measure Ad Performance:**

To measure the effectiveness of advertising campaigns, optimise future campaigns, and improve the overall quality of advertising.

**Reasonableness:** This processing is necessary to understand user behaviour and preferences in relation to advertising, allowing for more targeted and effective campaigns.

**Balancing Test:** The processing is proportionate to the legitimate interest, as it involves anonymised and aggregated data, and the results are used to improve the overall advertising ecosystem.

**Purpose 8: Apply Market Research to Generate Audience Insights:**

To gain insights into user preferences, behaviors, and demographics to inform business decisions and improve products and services.

**Reasonableness:** This processing is necessary to understand the market and tailor offerings to user needs and preferences.

**Balancing Test:** The processing is proportionate to the legitimate interest, as it involves anonymised and aggregated data, and the results are used to improve the overall user experience.

**Purpose 9: Develop and Improve Products:**

To improve products and services based on user data and feedback.

**Reasonableness:** This processing is necessary to ensure that products and services meet user needs and expectations.

**Balancing Test:** The processing is proportionate to the legitimate interest, as it involves anonymised and aggregated data, and the results are used to improve the overall user experience.

## **Purpose 10: Ensure Security, Prevent Fraud, and Debug**

To protect systems and users from security threats and fraudulent activity, and to ensure the proper functioning of the platform.

**Reasonableness:** This processing is necessary to maintain the security and integrity of the platform and to protect user data.

**Balancing Test:** The processing is proportionate to the legitimate interest, as it involves necessary security measures and is carried out in a transparent and lawful manner.

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## **Data Protection Principles**

Content Ignite operates under the principles of lawfulness, fairness, and transparency. Users are informed about the processing and their rights.

**Transparency:** Users are provided clear and concise information about the processing of personal data, including the purpose and the types of data processed.

**Choice:** Users are offered the option to opt-out of interest-based advertising data processing activities.

**Purpose Limitation:** The data is processed for the specified purposes only.

**Data Minimisation:** Only the necessary data is processed.

**Accuracy:** The data is kept accurate and up-to-date.

**Storage Limitation:** The data is not stored longer than necessary

**Security, Integrity and Confidentiality:** Appropriate technical and organisational measures to protect personal data from unauthorised access, disclosure, alteration, or destruction are in place to protect the data

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## **Reasonable Expectations of Data Processing**

The data processed is not likely to be considered particularly private. No children's data or data relating to other vulnerable people is being processed.

No data being processed for this purpose will independently identify an individual nor, with any deterministic certainty, an individual device.

As the personal data in focus being IP Addresses, such information is not only subject to dynamic change by ISPs, any given IP Address may relate to dozens or hundreds of individuals, making it data not fundamentally under the control of a single individual.

Content Ignite adheres to the EU/UK GDPR and ePrivacy Directive explicit consent requirements. The only “personal information” involved are IP Addresses provided at the point of ad serving. Content Ignite does not use cookies, directly-identifiable device information, active device scanning of devices for data elements beyond those always provided

Content Ignite complies with industry guidelines and the codes of conduct provided by organisations including the IAB UK, IAB EU, DAA, EDAA, NAI.

As the methodology specifically only uses data provided with standard Internet/HTTP web activity, and cannot be used to definitively and deterministically-identify an individual or their device, Content Ignite believes the processing is an ethical and consumer-friendly/safe approach to help serve ads and measure marketing campaign performance.

## **Conclusion**

### **Content Ignite can rely on Legitimate Interest for this processing.**

The nature of the “personal data” subject to this Legitimate Interest assessment is the most fundamental aspect of Internet use and the least related to identifiable “individuals.”

At the same time, Content Ignite clients have an important business need to improve user experience, optimise advertising, and protect systems and users.

The data processed is limited to what is necessary for the specific purposes. Therefore, Content Ignite believes Legitimate Interest is an appropriate lawful basis for the processing of the limited “personal data” in this context.

### **Record Keeping:**

This LIA will be reviewed and updated periodically to ensure its continued accuracy and compliance with applicable laws and regulations.

Jan 10, 2024

