

Legitimate Interest Assessment Content Ignite

January 2025

For IAB TCF Special Purposes 1 (Select Basic Ads) and 2 (Select Basic Ads – Limited)

Introduction

This LIA outlines the legitimate interests for processing personal data under IAB TCF Special Purposes 1 and 2, which focus on selecting basic ads based on limited data.

Purpose of Data Processing:

- **Special Purpose 1: Select Basic Ads:** To select relevant advertising based on limited data to ensure ads are displayed on compatible devices and in browsers compatible with the ad format.
- **Special Purpose 2: Select Basic Ads – Limited:** To select relevant advertising based on a very limited set of data, such as browser type and operating system, for basic ad selection.

Data Subjects: Website visitors

Data Categories:

- **Directly Collected:**
 - IP address (for basic ad selection and fraud prevention)
 - Device type (e.g., mobile, desktop)
 - Browser type
 - Operating system
 - Screen resolution
- **Inferred:**
 - General location (country, region) based on IP address (for ad targeting and fraud prevention)

Legitimate Interests:

- **Delivering Effective Advertising:**
 - Selecting basic ads based on limited data ensures that ads are displayed on compatible devices and in appropriate environments, improving the user experience and the effectiveness of advertising campaigns.
 - It also helps to prevent technical errors and improve the overall quality of the ad experience.
- **Optimising Ad Delivery:**
 - Basic ad selection allows us to optimise ad delivery by ensuring that ads are displayed on the most suitable devices and platforms.
- **Preventing Fraud & Ensure Regional Restrictions are honoured:**
 - Analysing limited data, such as IP address and device information, helps to detect and prevent fraudulent activity, such as invalid traffic and ad fraud.

Necessity and Proportionality:

- **Necessity:**
 - Processing the limited data categories listed above is necessary to achieve the legitimate interests outlined.
 - Alternative means to achieve these objectives without processing any data would significantly hinder the ability to deliver effective and relevant advertising.

Proportionality:

- **Data Minimisation:** We only collect and process the minimum amount of data necessary to achieve the legitimate interests.
- **Purpose Limitation:** The data is processed solely for the purposes outlined above.
- **Transparency:** We provide users with clear and concise information about data processing activities through our privacy policy and by utilising a Transparency & Consent Framework (TCF) solution.

- **User Choice:** Users have the option to opt-out of interest-based advertising through the TCF.

Balancing Legitimate Interests with Data Subject Rights:

- **Data Minimisation:** As stated above, we only collect and process the minimum amount of data necessary.
- **Transparency and User Choice:** We provide users with clear information about data processing activities and offer them the opportunity to control their preferences through the TCF.
- **Security Measures:** We implement appropriate technical and organisational measures to protect user data from unauthorised access, use, disclosure, alteration, or destruction.

Conclusion:

Based on the above assessment, we believe that **Content Ignite can rely on Legitimate Interest for this processing**, as it is necessary to achieve our legitimate interests while respecting user privacy and complying with all applicable data protection laws.

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.