

Content Ignite
Legitimate Interest Assessment
December 2024

IAB EU Transparent Consent Framework (TCF)

Purpose 11

Data Collection and Processing for Market Research and Product Development

Description:

This purpose involves collecting and processing user data (e.g., browsing behavior, demographics) to:

- Understand user preferences and interests.
- Improve the quality of our products and services.
- Develop new products and features.
- Conduct market research and analysis.
- Personalise user experience (e.g., targeted advertising).

5. Data Subjects: Website visitors

6. Data Categories:

● **Directly Collected:**

- IP address
- Device information (e.g., browser, operating system, screen resolution)
- User agent

● **Inferred:**

- User interests
- Location

7. Legitimate Interest:

- **Improving user experience:**

- By understanding user preferences, we can tailor our products and services to better meet users' needs.
- This can include personalised recommendations and improved website/app functionality.
- **Business development:**
 - Market research and analysis help us understand user behaviour and market trends.
 - This information is crucial for developing new products, improving existing ones, and making informed business decisions.
- **Innovation:**
 - Analysing user data allows us to identify areas for improvement and develop innovative solutions.

8. Necessity:

- The processing of personal data is necessary for achieving the legitimate interests outlined above.
- Alternative means to achieve these objectives (e.g., relying solely on aggregated data) would significantly limit our ability to understand user needs and improve our offerings.

9. Balancing Legitimate Interests with Data Subject Rights:

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 unauthorized access, disclosure, alteration, or destruction are in place to protect the data

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.