

# TrustPid

## Overview + Q&A

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# Agenda

## **What is TrustPid and Why TrustPid**

- Business Overview
- Timeline

## **How TrustPid Works**

- Technical perspective
- Legal perspective
- User perspective

## **Q&A**

# Business Overview

## **What is TrustPid**

- A live trial of a new technology platform in Germany (and in future France / Spain) working with a small number of partners to facilitate digital marketing and advertising underpinned by privacy by design principles

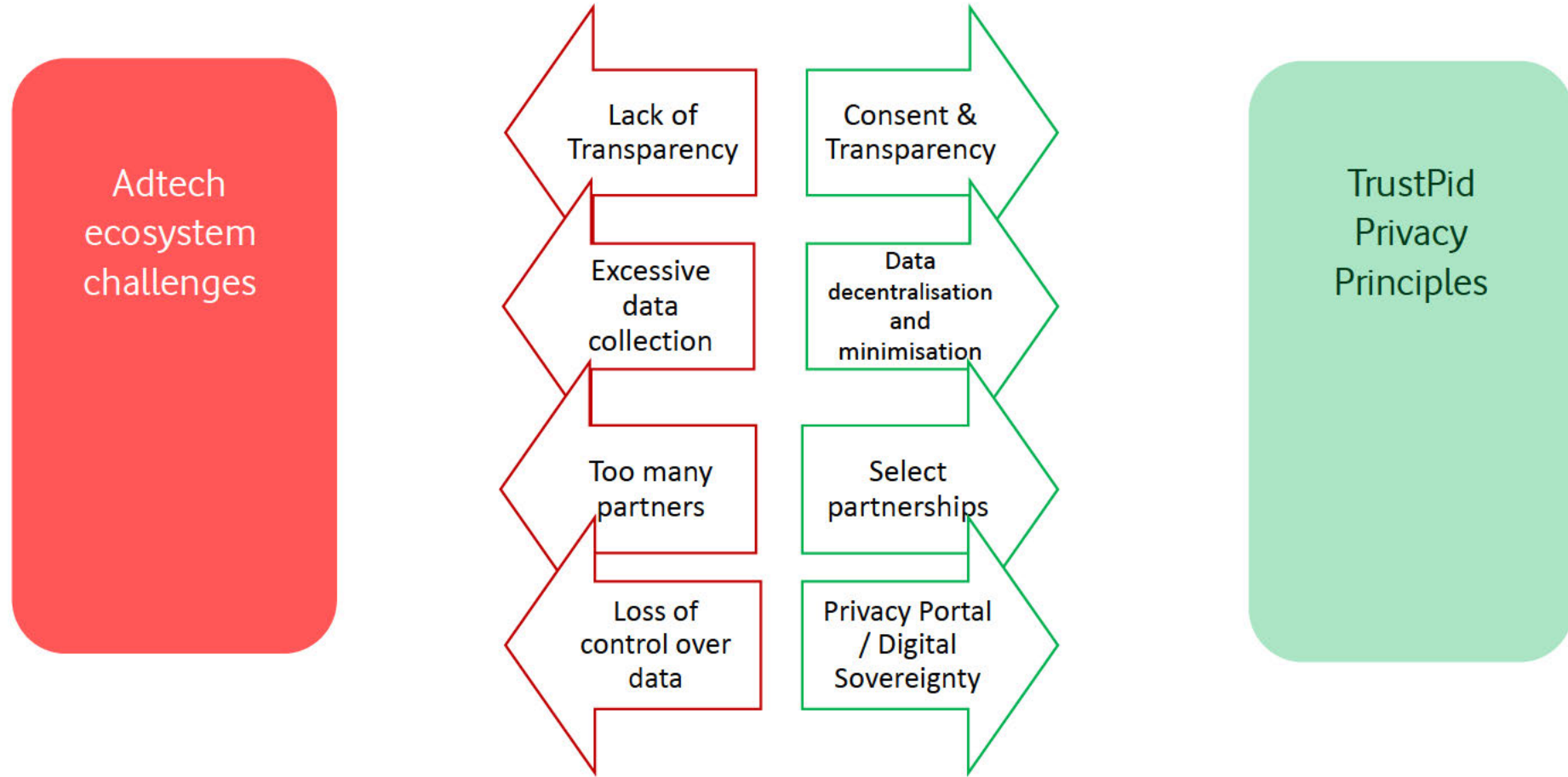
## **Why**

- To ensure a competitive, innovative and open internet
- To give consumers control and protection over their data

## **TrustPid Objectives**

- Technical feasibility of platform
- Commercial validation
- Test of consumer experience covering consent and privacy management

# Privacy By Design as a Key Differentiator



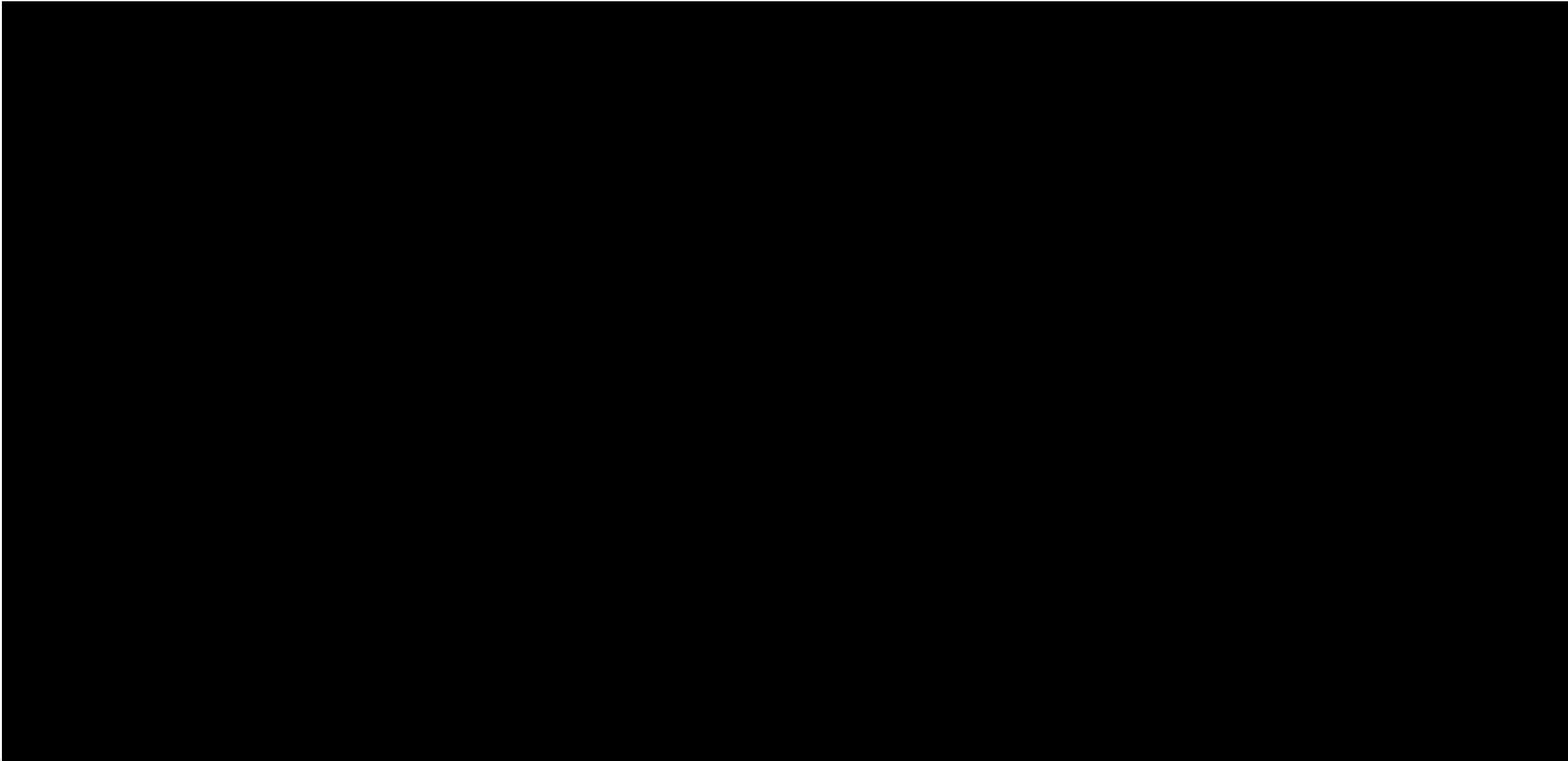


# How TrustPid Works

## Technical perspective: Data flow overview

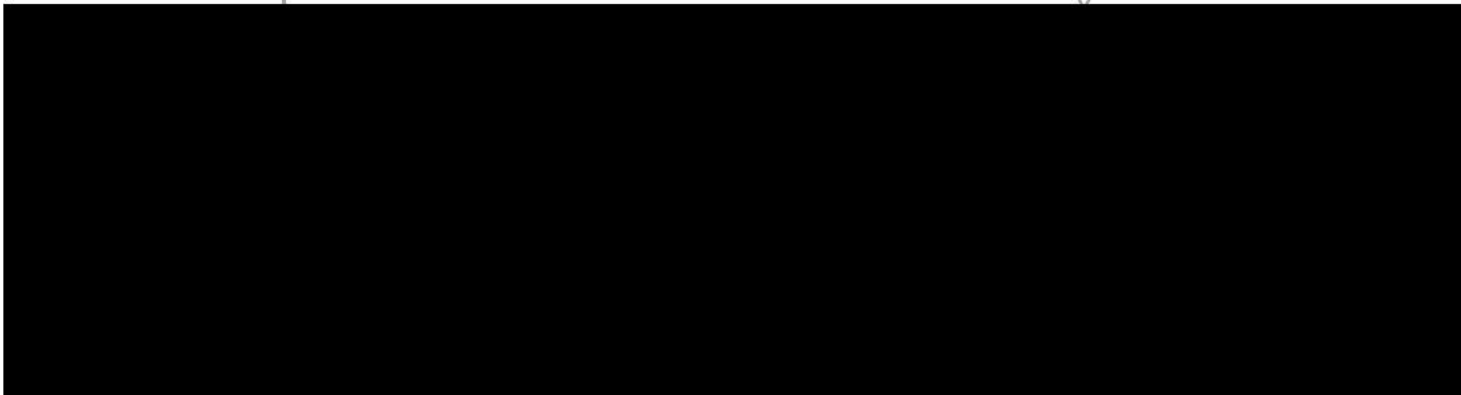
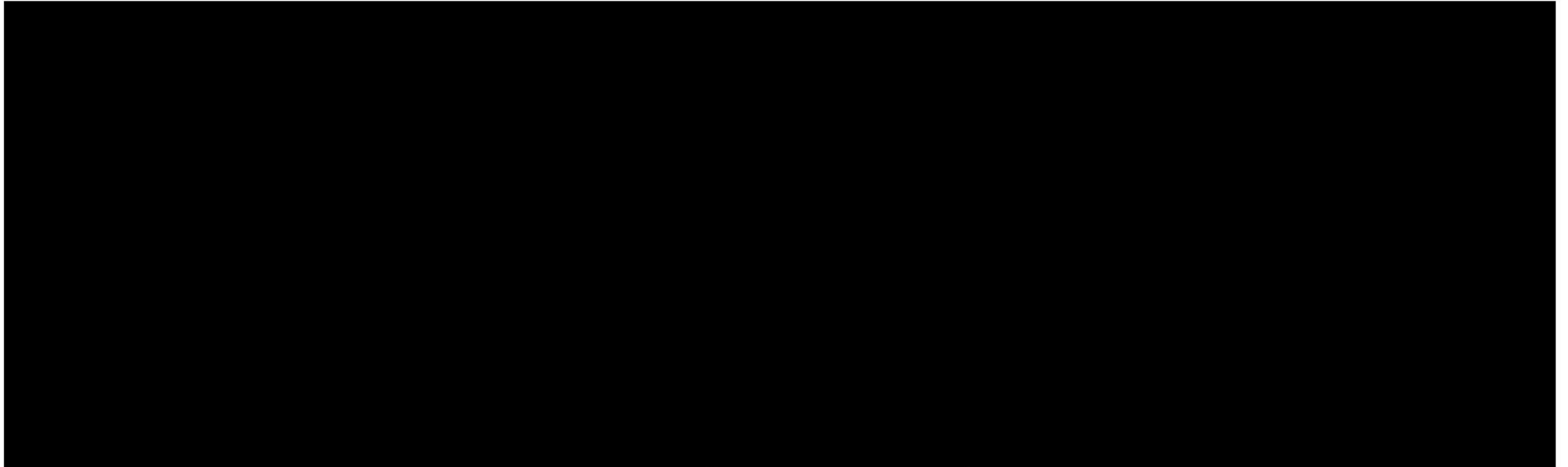


## Technical perspective: security and privacy measures (tokens)





## Legal perspective: ePrivacy & GDPR



### **ePrivacy Art 5(3)**

Processing of IP address for the purpose of determining if a user is eligible to use the TrustPid service and identify whether or not to show the dedicated TrustPid consent pop-up in participating website operator's sites

## Legal perspective: ePrivacy & GDPR

### **ePrivacy Art 6(3)\***

Processing of traffic data (IP address) for the provision of a value-added service to telco customers: empowerment or greater control and transparency over the processing of their data

# Legal perspective: ePrivacy & GDPR

## **ePrivacy Art 5(3)**

Storage of tokens on user's device

## **GDPR Art 6(1)(a)**

Processing of pseudonymous data to generate and manage IDs and for brands and publishers to use tokens to provide personalised advertising, products and contents

Processing of data to enable users to maintain control over their data via Privacy Portal

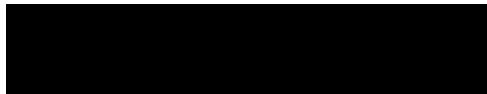
# Legal perspective: Data Protection Roles

## **Telcos and VSSL**

- Transfers of data and processing as independent data controllers
  - Telcos have limited processing role, responsible for providing hashed network IDs to VSSL
  - In the current pilot phase the "intermediary" role is assumed by VSSL, while in the commercial phase this role will be assumed by a Joint Venture (JV) owned by the four main European carriers (TEF, VOD, DT and ORA)

## **Brands, media and VSSL/JV**

- Transfers of data and processing as joint data controllers



- Provision of technical integration services, operation of the platform and supply and purchase of advertising space as VSSL's data processors

# Legal perspective: Privacy by Design

## **Lawful, Fair & Transparent Processing**

### **Freely given opt-in consent**

- Contractually defined text and form
- Separate from other cookies/tracking info
- Required for each partner site (no global consents)
- Due diligence

### **Layered transparency**

## **Technical & Operational Measures**

### **Data minimisation**

- First party, non-persistent, time bound, revocable IDs
- Multiple de-identification layers
- Limited personal data in scope

### **Data decentralisation/need-to-know principle**

### **Contractual safeguards**

- For all entities involved
- No special category data processing

## **User Choice & Control**

### **Privacy Portal**

- Centralised preferences management
- Exercise of rights on self-serve basis

### **One click reject button**

### **Consent revocation easily and at any time**

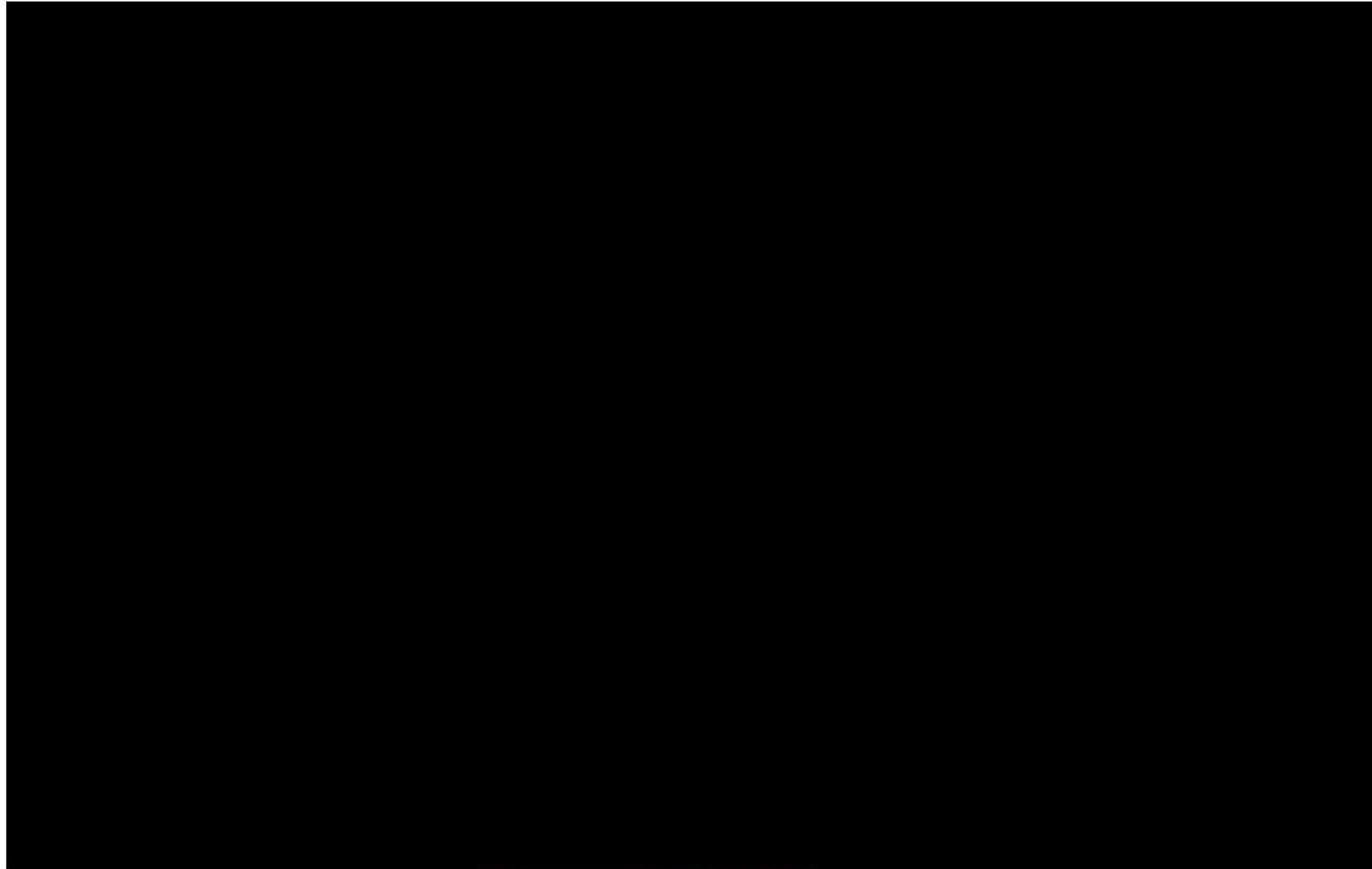
### **Block service (pre or post activation)**

## **Privacy First Approach**

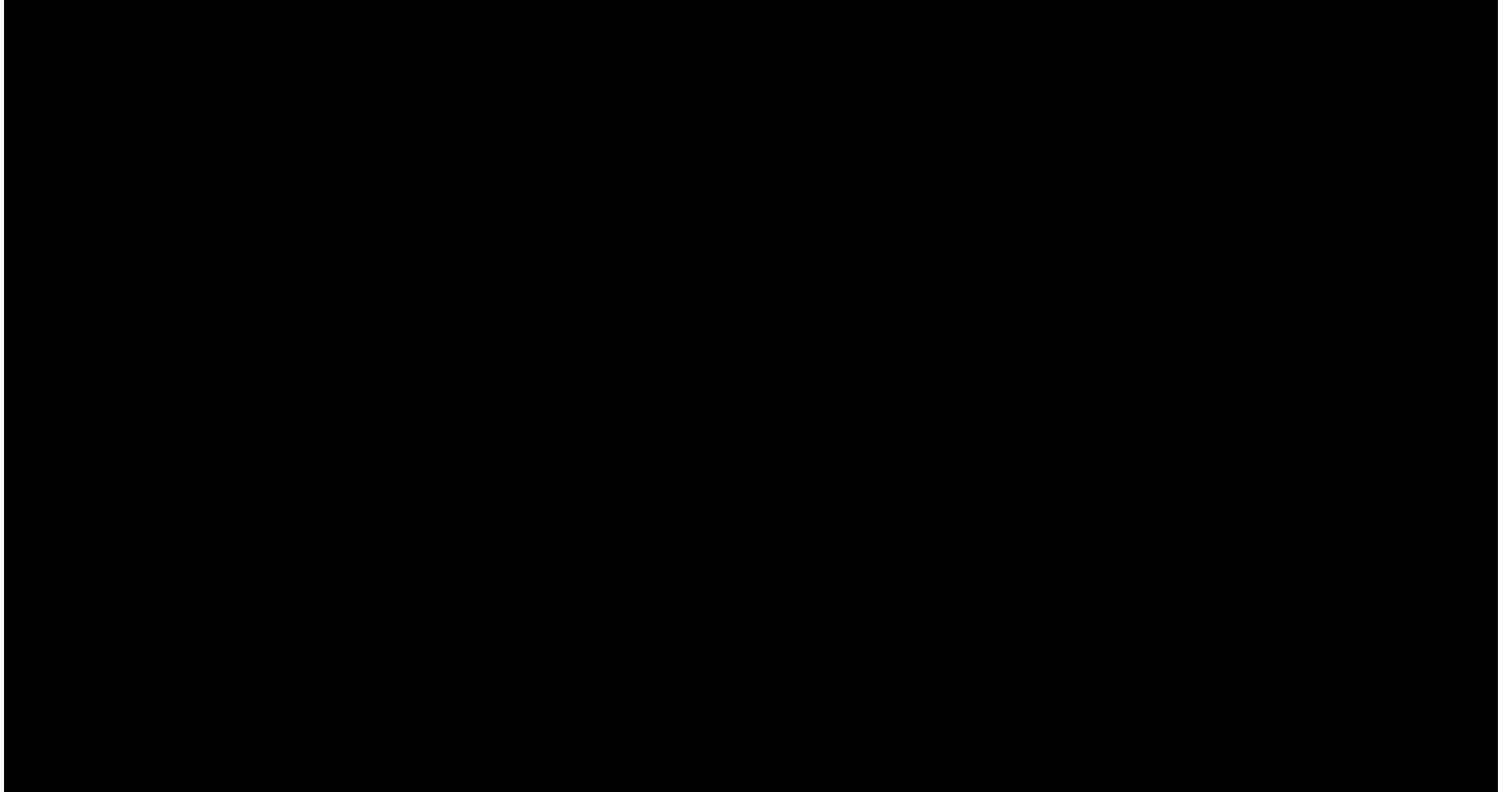
### **Privacy as a value proposition**

### **Engagement with DPAs**

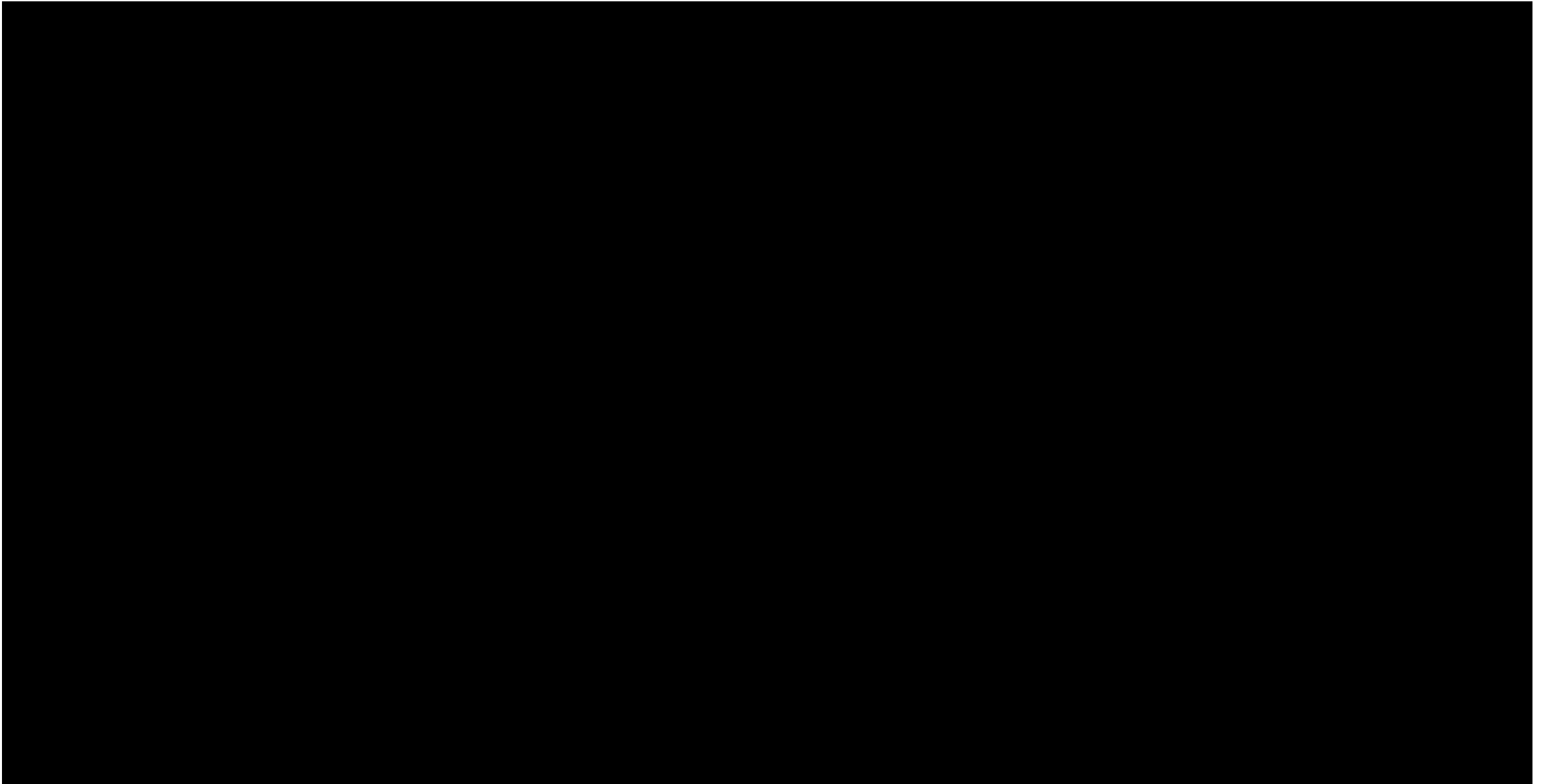
## User perspective: Consent Capture



## User perspective: Consent Withdrawal

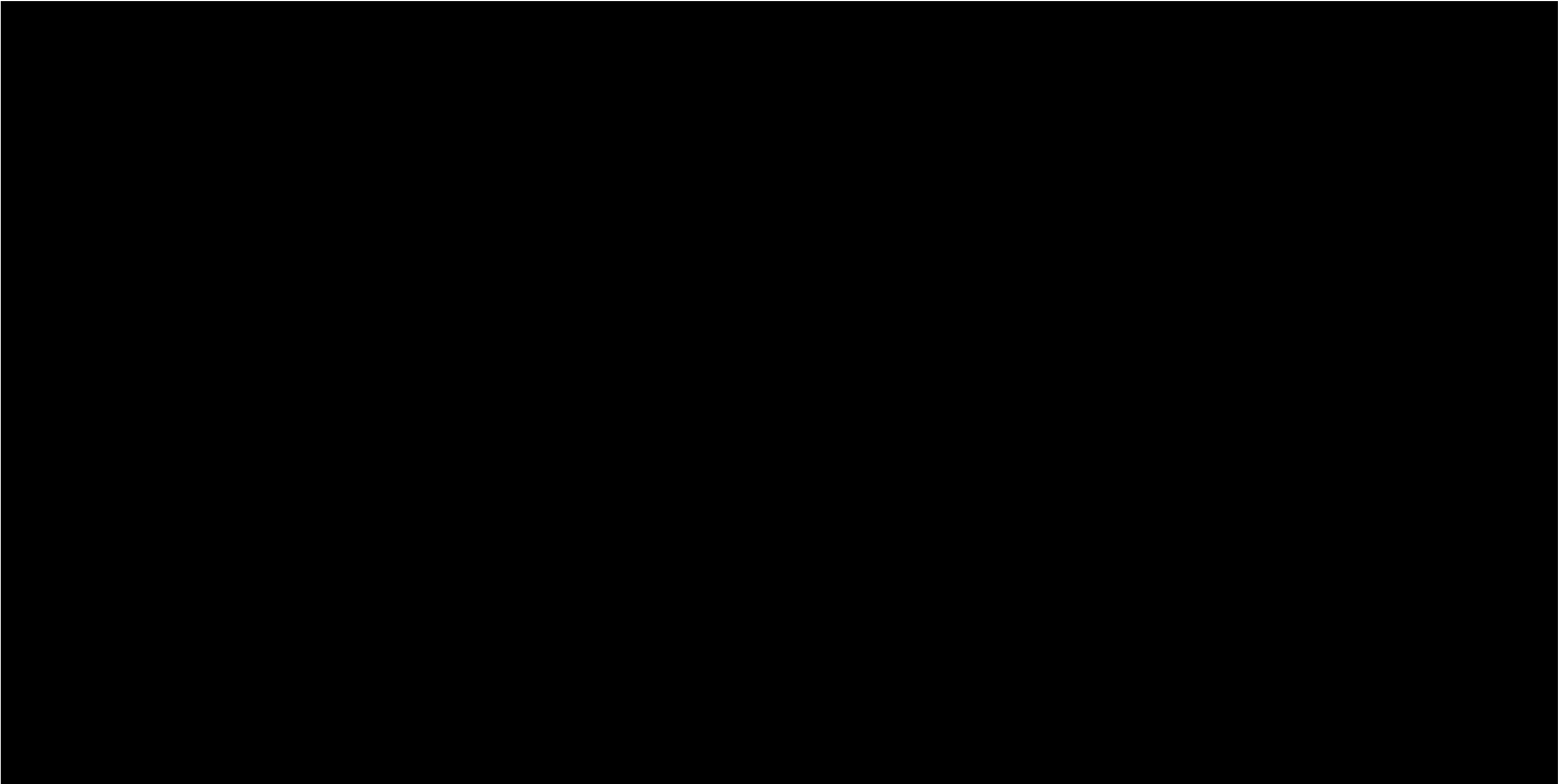


## User perspective: Privacy Portal





## User perspective: Manage Preferences



## User perspective: TrustPid value added for the user

Consent based	✓
1 click reject option	✓
Centralised consent management	✓
Data decentralisation	✓
No special category data	✓
Block service feature	✓
Contracts with all processing parties	✓

# Q&A

# Supplementary Materials

# Privacy by Design: Key elements

## **Consent**

- Delegated consent model, collected by brands and publishers (consent is specific and required for each site)
- Requirements for obtaining consent are contractually established (defining form and text to be used)
- Due diligence conducted on a weekly basis to ensure correct implementation of consent requirements

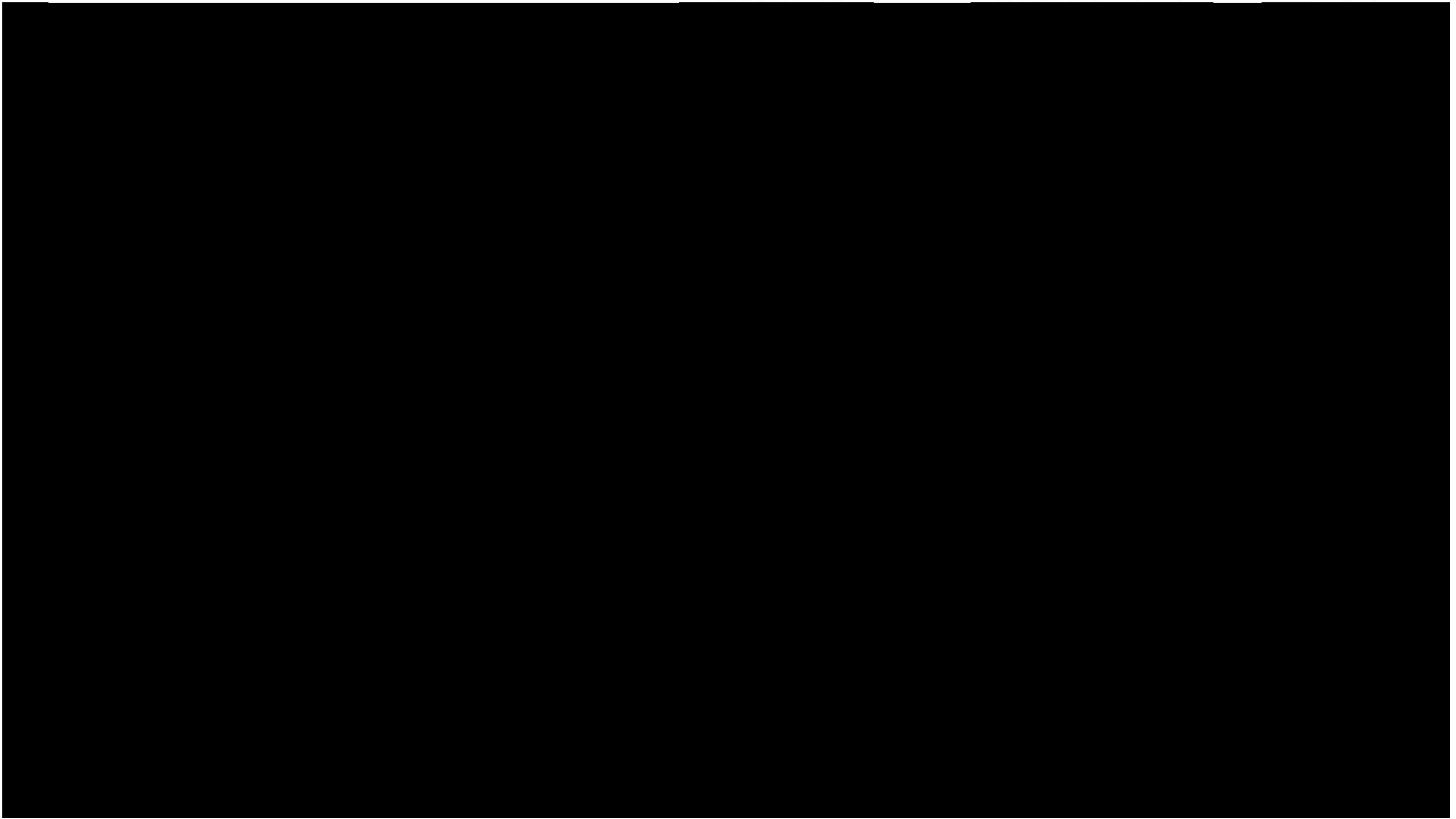
## **Controlled ecosystem** reducing “cross-site tracking”, large scale processing of data, and creation and use of profiles in an intrusive manner

- Contracts with all entities involved
- TrustPid operates as first party ID rather than third party
- No processing of special category data
- Data minimisation involving limited number of Ids created which are non-persistent and created through multiple steps of de-identification to break link-ability back to user

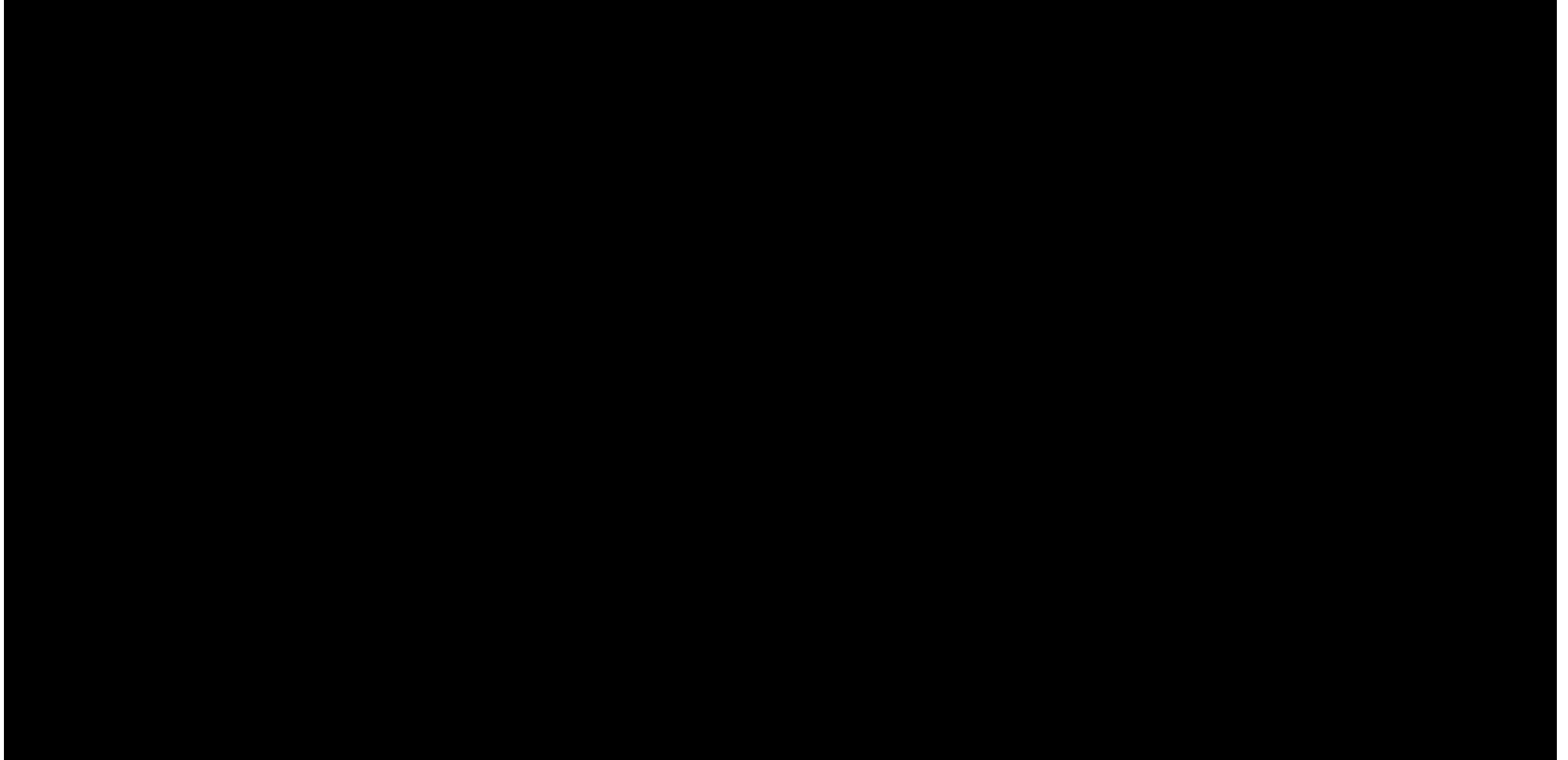
## **Privacy Portal, transparency and control**

- Centralised consent management = digital sovereignty
- User can exercise their data Protection rights on a self-serve basis
- Detailed Information about the Service provided (through multiple channels)
- Possibility to block the service (pre or post activation)

## **Engagement with data Protection authorities and adoption of their recommendations**



Overview of generated tokens and the players that have access to these



# Consent collection from technical perspective





# Consent collection from technical perspective

