Data Protection Impact Assessment – Citizen Reach (v2.2)

This policy will be communicated to all staff, contractors, and suppliers as appropriate.

Date of Review: 1 December 2024

Next review date: 1 December 2026

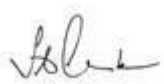
This policy has been approved & authorised by:

Name: Lloyd Clark

Position: Managing Director

Date: 1 December 2024

Signature:



Overview

The CAN Digital Solutions (CAN) Citizen Reach (CR) service places digital advertising for clients using a range of platforms. The objective of each campaign is dependent on client requirements but typically includes 1) reaching the target audience and 2) maximising interaction so that the client can achieve their defined goals. In this role, we use a range of advertising platforms that connect directly to users via websites, video and social media.

Under the Data Protection Act 2018 (DPA), DPIAs are mandatory for entities involved in processing of personal data in a way which involves tracking individuals' online or offline location or behaviour. In CAN's view, digital advertising meets this requirement, and this DPIA has been prepared to comply with the regulation.

Data processing

Nature of the processing

CAN purchases advertising space in real-time on various websites and social media platforms. When a user clicks on an ad placed by CAN, they are redirected to a landing page, hosted by CAN or CAN's public sector partner (eg, a council or NHS ICB). The landing page contains campaign information and, if relevant, a data capture form.

Key features of CAN's programmatic activity are "retargeting" and "audience building". Retargeting is the process of storing an anonymous ID for a user who has interacted with a campaign (ie, clicked on an ad) but has not completed a call to action (eg, filled in a form). The anonymous ID allows CAN to deliver additional campaign impressions to the user over time to nudge them to complete the action. Audience building is similar except that the anonymous ID is used in future campaigns, either targeting the same area/behaviour or the same audience characteristics.

The data used for retargeting and audience building is largely non-personal. The data defined as personal in the DPA is restricted to the IP address. No specific data sources - email addresses, telephone numbers - are used.

The primary risk factor relates to the transparency of the retargeting and audience building process. While CAN relies on user consent (see Context below) to capture user data, the technology environment is difficult to explain to most users so they may provide uninformed consent. A secondary risk factor relates to the use of the data for purposes other than audience building and retargeting. Both factors are considered low risk and will be addressed in this DPIA.

Scope of the processing

CAN uses pixels or tags - small amounts of code - to collect the data required for retargeting and audience building. The pixels cover the various platforms CAN uses for programmatic advertising and are placed on the web site typically by the partner's web team. The data collected by the pixels may contain the following elements:

- URL of the web page(s) the user visits
- URL of the referrer web page (ie, where the ad was placed)

- ID of the pixel and corresponding cookie
- Browser type and settings
- Operating system
- Device type
- Screen resolution
- Date and time
- IP address

The data is collected each time a user accesses a web page. The amount of data transferred depends on the user's browsing history. If the browsing history was recently deleted (all browsers have settings that allow browsing history to be automatically deleted when the browser is closed), then the data footprint is very light. However, the process repeats with each new link the user accesses.

Context of the processing

CAN relies on user consent to use and process all data. All CAN partners are required to use a Consent Management Platform (CMP). CAN provides a CMP at no cost. The CMP provides information on the data, its uses and purpose, the parties involved and the storage period. Users are free to opt in or out and can request the deletion of their data at any time.

Children and vulnerable groups can be targeted depending on the platform, though not all platforms allow targeting of under 18s or allow specific parameter targeting. CAN will use targeting of under 18s and vulnerable groups based on the objectives of the campaign. For instance, campaigns encouraging teens to be vaccinated against Covid-19 will be targeted to teens and their parents. No targeting of under 13s is permitted.

The data collected by the pixels is stored by the platforms CAN uses to source programmatic advertising. CAN and its public sector partners have no access to this data. On most platforms, the data is siloed and used solely for the individual partner with whom CAN is working and solely for the purpose of audience building and retargeting. However, on Meta, the data can be used by other advertisers. To mitigate risks, CAN does not recommend the use of the Meta pixel on any sites that contain special category data; however, CAN does support the use of the Meta pixel on special purpose sites that do not contact special category data.

Purpose of the processing

The purpose of the data collection is to retarget users who have clicked on a campaign asset but have not completed the transaction and to build audiences for use in future campaigns.

The benefit to users is that they receive encouragement (nudges) on topics of identified interest. The benefit to the partner is higher conversion rates and campaign efficiency.

Consultation

There has been significant negative press about digital advertising, but this relates almost exclusively to "third-party" cookies used in the placement of advertising. Marketing pixels used in the CR service have proven to be reliable and safe.

Necessity and proportionality

The processing is effective for retargeting and audience building. There is no other means at present to achieve the same results.

CAN deploys a CMP to ensure users are informed and provide consent before any data is collected. The CMP spells out what information is captured and the parties that use it. The user is able to choose what type, if any, he or she is willing to share and with whom.

Risk Assessment

Risk source and impact	Likelihood of harm	Severity of harm	Overall risk
1. Inability for users to provide informed consent. Because programmatic advertising is complex, there is a risk that the user does not understand how their personal data will be used. CAN provides a CMP to inform users of the data and purpose.	Remote	Minimal	Low
2. Data not used for the permitted purpose. CAN has no access to the collected data. It is stored by the programmatic advertising platforms and is intended to be siloed for CAN and its partners exclusively. CAN has contracts with each platform subject to specific data protection.	Remote	Severe	Low