



FRESHWHEEL  
A COMCAST COMPANY

COUNCIL FOR  
PREMIUM VIDEO

# PUTTING THE CONSUMER AT THE HEART OF DATA STRATEGY

HOW IDENTITY MANAGEMENT  
AND PRIVACY CAN COEXIST

MARCH 2021

# INTRODUCTION

As the technology and legislation around data in the world of TV and premium video has evolved, the need for more robust identity management that addresses user privacy requirements is clear.

To deliver more relevant and effective advertising, publishers are focused on the fine balance between connecting identity mechanisms across platforms, while ensuring consumers understand how their data is processed and that their privacy choices are addressed through transparency and control:



## TRANSPARENCY

Speaks to the need for users to understand how their data is being used and who has access to their data.



## CONTROL

Speaks to the need (depending on jurisdiction) for users to access, delete, object to the processing of, and revoke permissions to use their data.

There have been positive signs of progress, particularly from some premium video stakeholders who have brought consumer privacy to the forefront of their strategy.

This thought leadership report from the FreeWheel Council for Premium Video (FWC) addresses the evolving state of identity management in the world of premium video advertising.

# THE DEMISE OF THE COOKIE & THE DEVICE CHALLENGE

Over the past year, almost all browsers have made significant changes to their data collection policies, creating ramifications for the third-party cookie, which has historically been the cornerstone of digital identity for decades.

Third-party cookies are bits of information stored on a website visitor's computer by a third-party (not the one the user is visiting at the time). Third-party cookies collect and store the website visitor's information such as browser data. The 'cookies' are often used to monitor or track user activity online for behavior (re-)targeting.

The deprecation of third-party cookies means that most data-driven marketing capabilities such as people-based marketing, frequency capping or (re-)targeting on desktop have become difficult in browser environments.

Like any major shift in the advertising industry, the demise of the cookie has created a challenge, particularly for those who relied heavily on third-party data and drove marketers more towards 'walled-gardens' since they hold valuable first-party data, enabling granular targeting and measurement.

Additionally, as many emerging app-based platforms and Connected TVs (CTV) have never relied on cookies, new alternatives have surfaced and the emergence of a myriad of identity solutions providers that are trying to solve for the post third-party cookie era. While these IDs (either deterministic or probabilistic) offer some interesting tools, there is a challenge for advertisers and programmers in keeping track and efficiently managing all these (often overlapping) IDs, as well as all the associated costs.



TV and premium video platforms have successfully scaled beyond the desktop with more CTV — which does not rely on third-party cookies — and mobile ad impressions delivered through applications, and in some cases authenticated through subscription services. Interestingly this trend has seen an acceleration during the pandemic with more TV / premium content consumption in all its forms.

Cable and satellite aggregated household TV viewing data has also evolved to become more actionable over the last few years, and there are now more sophisticated ways of connecting the dots between consumption across all of these platforms.

From a device manufacturers' standpoint, device IDs will continue to be less persistent as manufacturers develop more sophisticated solutions and audiences can be reached across all the platforms used to access content. However, some companies have taken disruptive decisions, such as Apple's latest announcement on IDFAs, which will take effect with the release of iOS14.

Meanwhile, some industry bodies have formed their own working groups to address these concerns. The IAB, for example, has created the "Rearc" working group to address both user privacy and addressability concerns for digital content (but not TV, nor addressable TV). Other leading trade organizations such as the ANA have formed a "partnership for responsible addressable media" to draft principles that will guide the future of addressability while safeguarding user privacy and improving the user experience.



# PRIVACY LAWS AND FRAMEWORKS

The challenges of third-party cookies and devices IDs together with the changes in privacy regulations and obligations came into place to prevent frustrating user experiences (such as ad re-targeting, leading to the use of ad blockers) and provided the consumer with greater transparency and consent management.

Privacy obligations are complex and varied. However, to simplify and make better sense of them, we can break it down into two broad groups:



## PRIVACY LAWS

Regulations or legislation created by local and national governments around the world with examples such as CCPA, GDPR, or the EU ePrivacy Directive.



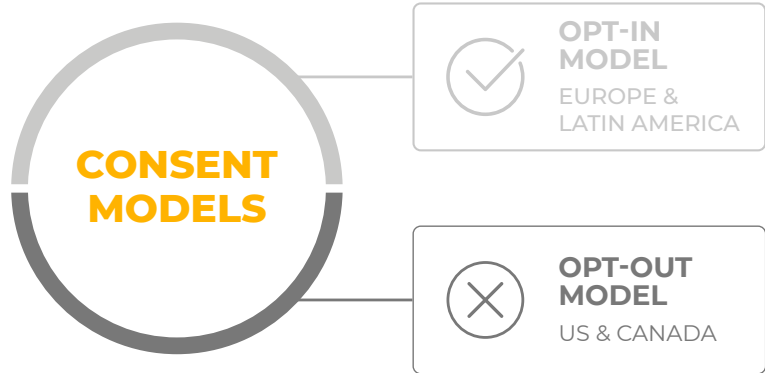
## PRIVACY FRAMEWORKS

Established by self-governing bodies like DAA, IAB, and EDAA, or set up by device manufacturers.

Premium publishers and other owners of first-party data have adjusted to these privacy laws and frameworks to ensure that consumers have more options to manage the personal information that is collected, shared and used.



Complexity in the space has certainly driven many ad tech innovations with a number of companies surfacing to tackle the issue. But with ever-evolving privacy laws and frameworks, it will be a challenge for companies to keep one eye on the present and the other on the future as they build new solutions.



**Note:**

*Represents the state of most consent models relevant to targeted advertising.*






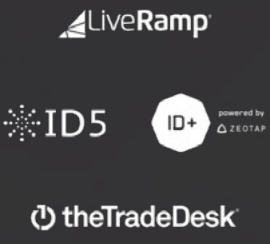


**Consumer trust is probably the most valuable asset that publishers and advertisers can earn. Deploying the appropriate consent solutions and listening to consumer preferences is paramount, as it will also help deliver richer first-party data in a privacy-compliant way. Partnering with the right data partners is therefore essential.**

– *David Fisher, VP Advanced Advertising,  
Discovery Networks International*

# IDENTITY DATA PARTNERS

Given that data is more fragmented and siloed than ever before, it is interesting to uncover the various identity data players in the industry.

The data universe is already crowded with a variety of data partners bringing a set of unique characteristics and capabilities. Below is a table presenting the main identity data categories, what their roles are in the ecosystem and examples of some of the players.

 <p><b>DATA OWNER</b> <i>Understand and monetize customers in a privacy compliant manner</i></p>	<p><b>DESCRIPTION</b> Brands, publishers and device manufacturers that collect, own and monetize data.</p> <p><b>TYPES OF DATA</b> Name, address, email, demo data, cookie, mobile device ID, attributes</p>	
 <p><b>3P IDENTITY PROVIDERS (PROGRAMMATIC)</b> <i>Share identity data in the bid stream for buy-side audience targeting</i></p>	<p><b>DESCRIPTION</b> Functionality to securely translate authenticated users on the sell-side to identifiers in the bid-request.</p> <p><b>TYPES OF DATA</b> Authentication Data (Email, Phone Number), Bid Request Data (IdentityLink, Unified ID 2.0, ID+)</p>	
 <p><b>DATA MANAGEMENT PLATFORM (DMP)</b> <i>Find, extend, size and target audiences</i></p>	<p><b>DESCRIPTION</b> Platform to collect, manage and purchase data to better find audiences.</p> <p><b>TYPES OF DATA</b> Attributes, cookie, mobile device ID, CTV ID, IP address</p>	

This selection of providers is meant to illustrate the different solutions available, and is not an endorsement of certain providers over others.



### CUSTOMER DATA PLATFORM (CDP)

*Build detailed, accurate customer profiles to nurture relationships*

#### DESCRIPTION

Brands, publishers, device manufacturers and others that create unified customer profiles across many touchpoints for use in marketing efforts.

#### TYPES OF DATA

Name, address, email, demo, online behavior, IP address



### CROSS DEVICE GRAPH (XDG)

*Extend reach, connect data sets, perform analysis*

#### DESCRIPTION

Data set used to resolve identity from devices to individuals and households (HH).

#### TYPES OF DATA

HH ID, individual ID, cookie, mobile device ID, CTV ID, IP Address



### ONBOARDER

*Translate data for activation and targeting*

#### DESCRIPTION

Platform used to translate data to make it actionable for targeting.

#### TYPES OF DATA

HH ID, individual ID, cookie, mobile device ID, CTV ID, IP address, name, email, address



### CLEAN ROOMS

*Link anonymized marketing data from different sources*

#### DESCRIPTION

First-party data matched against aggregated ad data from walled gardens & determine potential inconsistencies & duplications.

#### TYPES OF DATA

Individual ID, CRM



# PREMIUM VIDEO & DATA FLOW

Advanced TV is likely to gain further traction in terms of identity management as there are fewer or no cookies in these environments. Through authentication mechanisms, the application of data might help improve the user experience across platforms.

On the marketer side, as direct-to-consumer (DTC) brands rise, and the direct relationship with the consumer is more prevalent, email and other identity touchpoints can be used for more robust, tailored interactions.

In this rapidly evolving identity landscape, TV is well placed to offer great value to advertisers. Where premium video stands apart from the rest of the ecosystem is its quality and the value they provide for which consumers are willing to share registration data or pay for content, whether that be through monthly cable or satellite subscription or a la carte OTT services.

There are many ways in which identity management can be achieved and used to enhance marketing efficacy and the advertising experience, but it requires an integrated ecosystem and partners to ensure that data integrity and privacy is maintained.

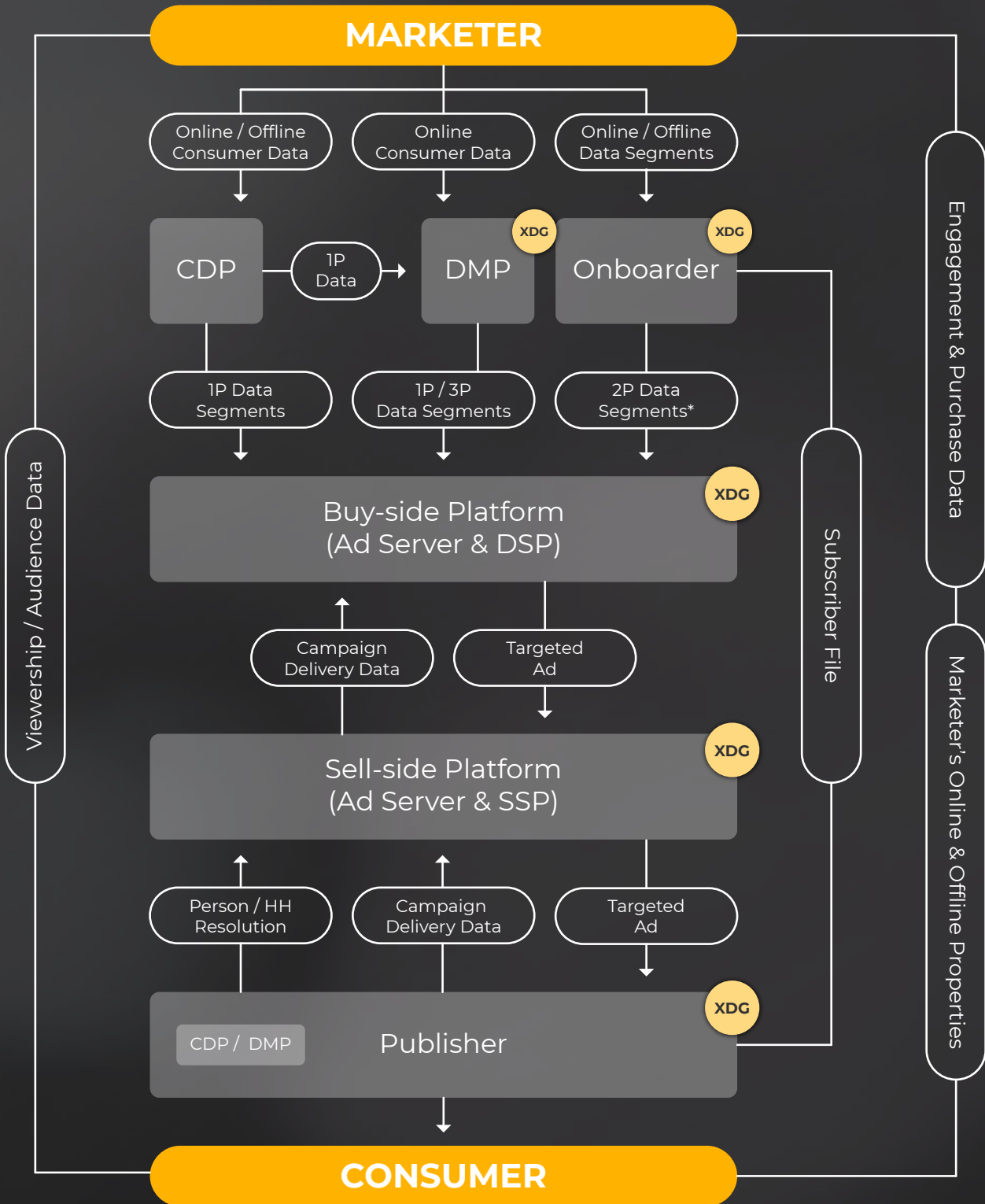
On the following page is a chart that demonstrates a simplified data flow from marketer to consumer showing how data circulates through the various players.



**Premium video offers a quality environment that upholds the highest privacy standards. The video ecosystem now combines its massive scale with the precision of digital, opening up more opportunities for personalization on any screen, creating a better experience for viewers and more impact for brands.**

— *John Alleva, SVP, Platform Monetization, NBCU*

# DATA FLOW IN THE PREMIUM VIDEO ENVIRONMENT



XDG: Cross Device Graph | \*2P Data: Marketer Segments Matched to Publisher Data.

# LOOKING AHEAD

There is a need for technology partners to take a proactive stance on data sources being utilized to help organize, manage and drive privacy compliance. Ultimately consumer control should be at the heart of any data strategy.

Regulations and businesses are putting the focus on privacy and consumer trust, as building audience trust is more important than ever. The user should be able to understand and decide how their data will be used, and importantly what they get out of it, how they can engage (or not) with brands and content, as well as how they can opt out (or opt in where required).

With fragmentation of viewing, we're now in a sub-scale environment and interoperability is critical. For advertisers the key is in aligning data across platforms. This alignment will be required for all advertising activities, from planning, execution (activation and frequency management) to reporting, measurement and attribution.

An exciting future lies ahead. With new technologies surfacing such as Blockchain,

Federated Learning and EDGE computing, there is a great opportunity to enhance, or in some cases, rebuild the ecosystem rooted in trust and transparency. There are many ways in which identity management can be achieved and used to enhance marketing efficacy and the advertising experience, but it requires interoperability and a fully functioning partner ecosystem to ensure that data integrity and privacy is maintained.

There is an urgent need for flexibility and collaboration as to how this is achieved, and a continued focus on privacy. The industry as a whole needs to continue to work together to innovate and find ways to understand the user in a way that protects consumer data, ensures advertisers and agencies can continue to target their audiences, and safeguards publishers' critical first-party data.

Truly supporting a safe and open premium content ecosystem, while protecting privacy, is possible. The focal point is the consumer.



**By expanding advanced data intelligence capabilities, the industry can deliver on the promise of more widespread addressability, manage reach and frequency, and enable robust reporting for parties within the value chain.**

— *Jessica Dufresne, GM, Digital Ad Tech & Yield, Sling TV*

The FreeWheel Council for Premium Video (FWC) serves the interest of the premium video industry through leadership positions, research and advocacy. Founded initially in the U.S. in 2015, and expanded into Europe in 2017, the FreeWheel Council for Premium Video (FWC) is an advocacy group comprised of 46 premium video providers globally, including programmers, payTV / telco-operators, and digital pure-plays. The FWC operates as an educational and organizing resource to assist marketers in reaching desired audiences in premium video environments, conducting research documenting the benefits of premium video, and championing the interests of member publishers and the market.

**FOR MORE  
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