

Data Uses	Sub-Uses	Definitions	Activity / Purpose	Possible Publisher Lawful Basis /	Other Legal or Regulatory Considerations
<u>Advertising</u>	Personalised Advertising	The processing of personal data (usually in the form of identifiers such as cookies or mobile advertising IDs) to <u>personalise</u> advertising (such as using first party data observed or inferred to make advertising more relevant).	Accessing a Device	Performance of a contract (e.g. site registration)	User consent under the ePrivacy Directive
			Location Data	Performance of a contract	User consent under the ePrivacy Directive
			Data Analysis, Profiling & Segmentation	Performance of a contract / Legitimate interest	
			Audience Verification	Performance of a contract / Legitimate Interest	
			Ad Delivery	Performance of a contract / Legitimate interest	
			Ad Frequency Capping	Performance of a contract / Legitimate interest	
	Customised Advertising	The processing of personal data to <u>customise</u> advertising (often involving the use of third party specialists) to tailor the ad to a group of users interested in similar things. Depending on the circumstances, data may be collected across sites, apps and / or devices.	Accessing a Device	User consent	User consent under the ePrivacy Directive. Consent needs to be passed to every third party who will also process the personal data
			Location Data	User consent	User consent under the ePrivacy Directive. Consent needs to be passed to every third party who will also process the personal data
			Data Analysis, Profiling & Segmentation	Legitimate Interest	
			Audience Verification	Legitimate Interest	
			Ad Delivery	Legitimate Interest	
			Ad Frequency Capping	Legitimate Interest	
	Remarketing	The processing of personal data to <u>represent ads</u> (often involving the use of third party specialists) for products previously seen by a user.	Accessing a Device	User consent	User consent under the ePrivacy Directive. Consent needs to be passed to every third party who will also process the personal data
			Location Data	User consent	User consent under the ePrivacy Directive. Consent needs to be passed to every third party who will also process the personal data
			Data Analysis, Profiling & Segmentation	Legitimate Interest	
			Audience Verification	Legitimate Interest	
			Ad Delivery	Legitimate Interest	
			Ad Frequency Capping	Legitimate Interest	
Analytics	The processing of personal data to ascertain whether a user <u>completes an action</u> that the ad was seeking to achieve.	Accessing a Device	User consent		
		Performance Analysis	Legitimate Interest		
		Audience Analysis	Legitimate Interest		

<b>Performance Marketing</b>	<b>Direct Marketing - B2C</b>	This involves the processing of personal data to marketing directly to both existing <u>consumer</u> customers and potential new ones, including affiliate marketing.	<i>Accessing a Device</i> <i>Analysis, Profiling &amp; Segmentation</i> <i>Delivery</i> <i>Social Media Custom Audience</i> <i>Affiliate Links</i>	User consent (unless via the performance of a contract with the user) Legitimate Interest Legitimate Interest Legitimate Interest Legitimate Interest	User consent under the ePrivacy Directive User consent under the ePrivacy Directive
	<b>Direct Marketing - B2B</b>	This involves the processing of personal data to marketing directly to both existing <u>business</u> customers and potential new ones, including affiliate marketing.	<i>Accessing a Device</i> <i>Analysis, Profiling &amp; Segmentation</i> <i>Delivery</i> <i>Social Media Custom Audience</i> <i>Affiliate Links</i>	User consent (unless via the performance of a contract with the user) Legitimate Interest Legitimate Interest Legitimate Interest Legitimate Interest	User consent under the ePrivacy Directive. Consent needs to be passed to every third party who will also process the personal data
<b>Site Analytics</b>	<b>Lead Generation (both B2C and B2B)</b>	This involves the processing of personal data for <u>lead generation</u> methods aiming to ascertain new customers.	<i>Accessing a Device</i> <i>Data Analysis &amp; Audience</i>	User Consent Legitimate Interest	User consent under the ePrivacy Directive. Consent needs to be passed to every third party who will also process the personal data
	<b>Site Usage &amp; Performance</b>	This involves the processing of personal data to analyse digital property (e.g. website, app) <u>usage &amp; performance</u> .	<i>Data Collection</i> <i>Measurement &amp; Analysis Reporting</i>	Legitimate Interest Legitimate Interest Legitimate Interest	
<b>eCommerce</b>	<b>Product Research &amp; Development</b>	This involves the processing of personal data to analyse digital property (e.g. website, app) usage & performance for <u>product research &amp; development</u> .	<i>Accessing a Device</i> <i>Data Analysis</i>	Legitimate Interest Legitimate Interest	
	<b>Product Effectiveness</b>	This involves the processing of personal data to analyse digital property (e.g. website, app) usage & performance for <u>product effectiveness purposes</u> .	<i>Data Collection</i> <i>Data Analysis</i>	Legitimate Interest Legitimate Interest	
	<b>Purchase Activity</b>	This involves the processing of personal data to implement <u>purchase activity</u> (including payment and delivery).	<i>Accessing a Device</i> <i>Purchase Processing &amp; Delivery</i>	Legitimate Interest User Consent (unless via the performance of a contract with the user)	
	<b>Product &amp; Service Recommendations</b>	This involves the processing of personal data for <u>product &amp; service recommendations</u> .	<i>Accessing a Device</i> <i>Data Analysis &amp; Audience</i> <i>Affiliate Links</i> <i>Content Delivery</i>	User Consent (unless via the performance of a contract with the user) Legitimate Interest Legitimate Interest Legitimate Interest	User consent under the ePrivacy Directive User consent under the ePrivacy Directive

<b><u>Network Security</u></b>	<b>Information Security</b>	This involves the processing of personal data for <u>information security</u> purposes, <i>Accessing a Device</i> including fraud prevention.	Legitimate Interest	
		<i>Analysis &amp; Technical Administration</i>	Legitimate Interest	
	<b>Other Legal Obligations</b>	This involves the processing of personal data for <u>other legal obligations</u> (e.g. law <i>Accessing a Device</i> enforcement).	Legitimate Interest	User consent under the ePrivacy Directive may be required.
		<i>Fraud Prevention</i>	Legitimate Interest	Other legal bases may be more relevant such as when (a) processing is necessary for compliance with a legal obligation (Article 6c); (b) processing is necessary in order to protect the vital interests of a user (Article 6d); or when (c) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Article 6e).
		<i>Data Breaches</i>	Legitimate Interest	Other legal bases may be more relevant such as when (a) processing is necessary for compliance with a legal obligation (Article 6c); (b) processing is necessary in order to protect the vital interests of a user (Article 6d); or when (c) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Article 6e).
<b><u>Content Personalisation</u></b>	<b>Site Personalisation &amp; Performance</b>	This involves the processing of personal data to <u>personalise the content and performance</u> of the digital property (e.g. website, app). <i>Accessing a Device</i>	User Consent (unless via the performance of a contract with the user)	
		<i>Location Data</i>	User Consent	User consent under the ePrivacy Directive
		<i>Profiling &amp; Segmentation</i>	Legitimate Interest	
		<i>Content Delivery</i>	Legitimate Interest	
	<b>3rd Party Log In</b>	This involves the processing of personal data to enable the <u>use of social media tools</u> <i>Social Media Log-In</i> for sharing content.	User Consent	User consent under the ePrivacy Directive
		<i>Content Sharing</i>	Legitimate Interest	

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