



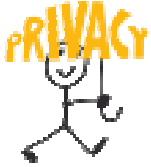
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# Data Minimization Phorm's Privacy Solution

November 5th, 2009  
Brooks Dobbs

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# History of data collection

- Web based companies have been conditioned that “data” is an asset that must be collected, stored, backed up and held for as long as possible.
- This conventional wisdom has gone largely unchallenged as the cost of physical storage\* has become so inexpensive and no other direct costs imposed.
- Too few companies have designed systems to operate on minimal data and to store only what is strictly necessary.

\*As of 28 Oct 2009 a 1 Terabyte Hard Drive available on Amazon.com for ~\$58 Euros

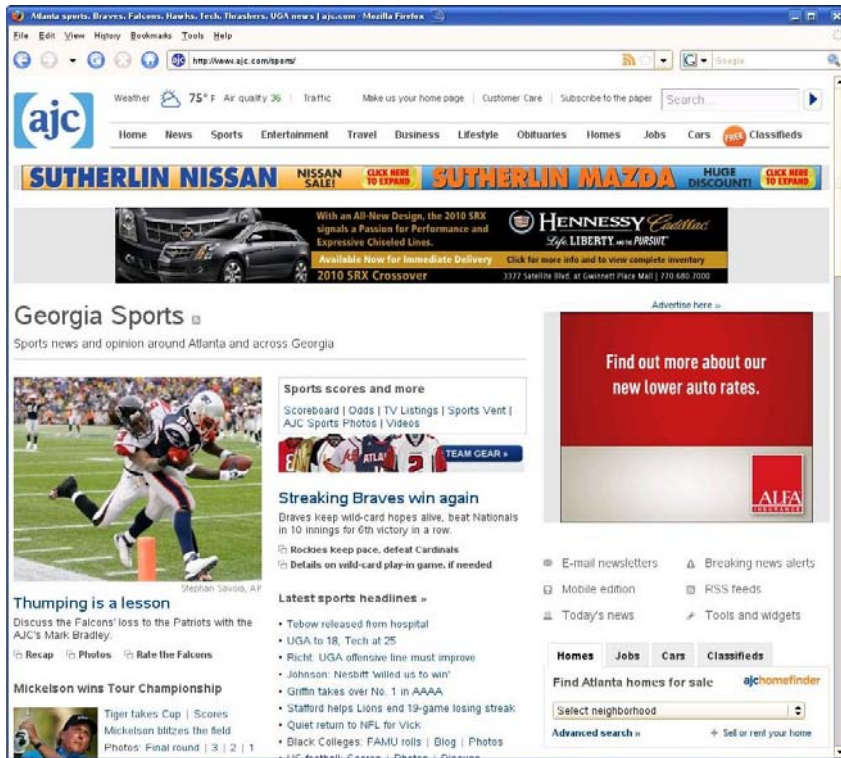
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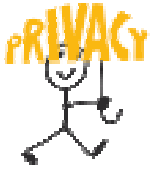
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## Online advertising and data collection in practice



- Online content is financed by viewers consuming advertising.
- While the number of ads and their position on the page are fixed, publishers rarely know which advertiser will appear to any particular user at any time.
- The term “3<sup>rd</sup> party” may create a misapprehension that these parties are not directly interacting with the consumer.

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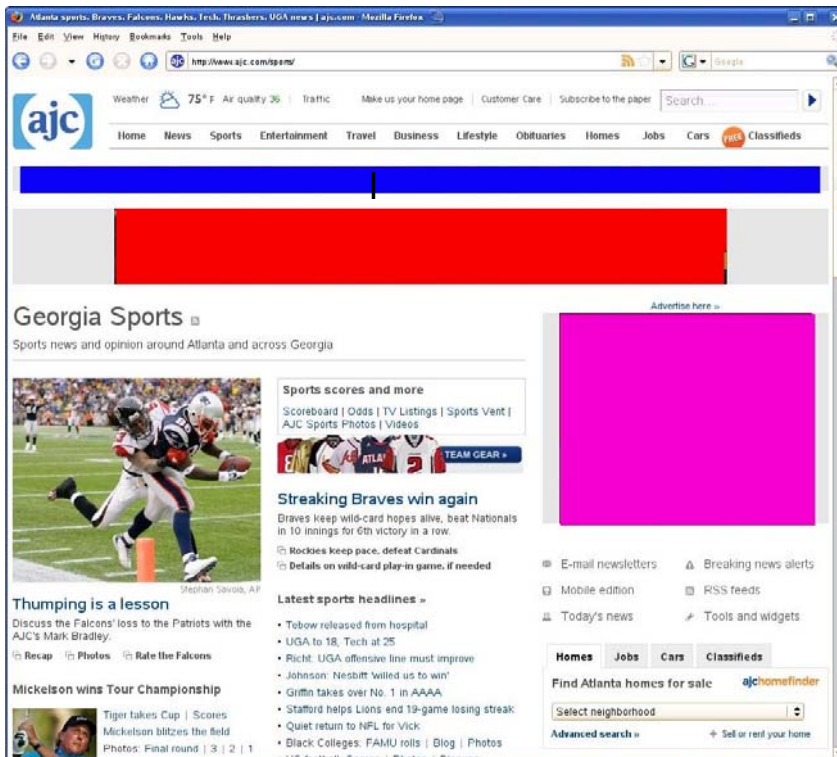
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## Each ad has multiple independent data collectors

To serve each ad data is collected by:

- Publisher Tool
- Ad Exchange(s)
- Ad Networks(s)
- Advertiser Deliver Tools
- Rich Media Tools
- Analytics
- More

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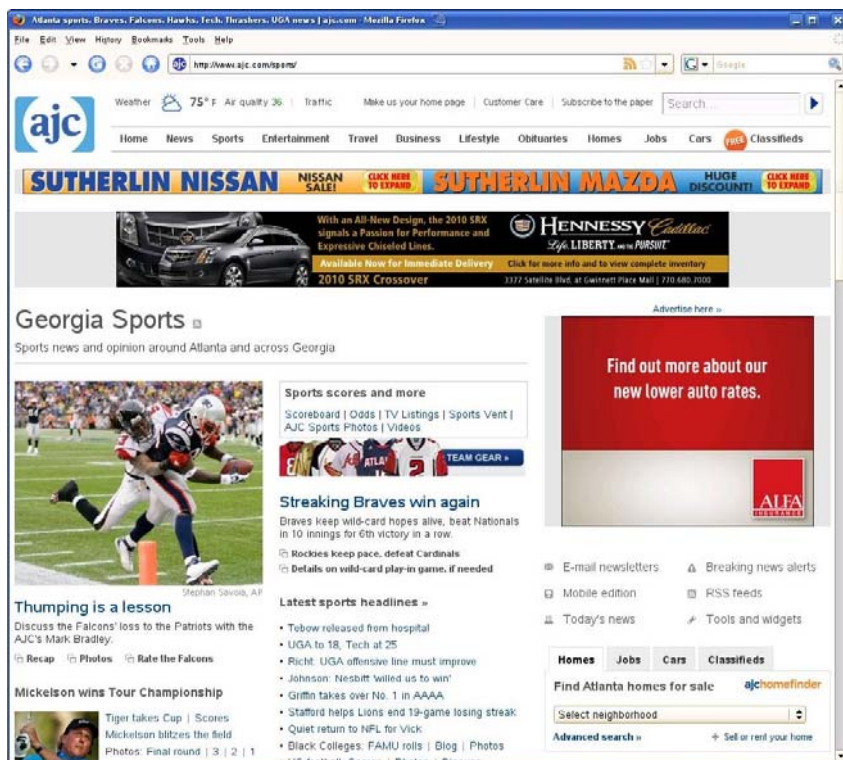
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## Data collection in a single page view

This one page resulted in:

- 24 - first party transactions
- 85- 3<sup>rd</sup> party transactions
- 46 - cookie setting events for 14 unique cookies
- 22 - discreet data collectors
- 21 - third party data collectors



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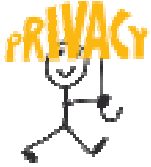


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## Data Minimization

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## What third parties typically collect

- IP Address of the computer making the request
  - Derived location data
  - Derived ISP
  - Derived connection type and speed
- Full URL of the request
  - May include information like customer or order id
- Full URL of the referring page
  - May include user information embedded by the 1<sup>st</sup> party
- Basic System Information
  - Computer's operating system
  - Type of browser
  - Language preferences
  - Available application handlers
- Cookies
- Time Stamp

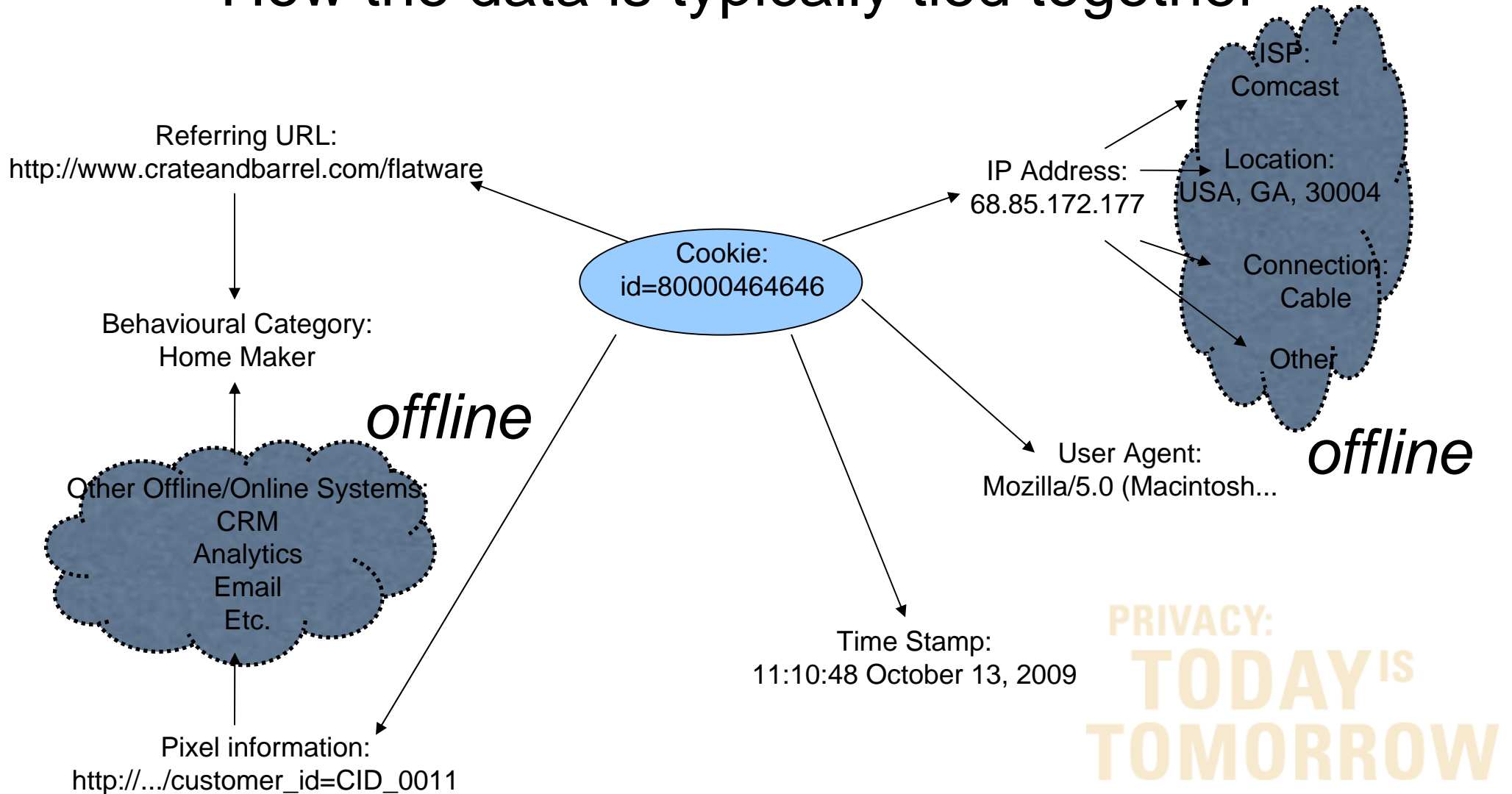
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# How the data is typically tied together





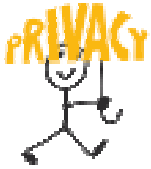
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## What Phorm collects

- Random Cookie ID – 24 digits
  - Not based on subscriber or browser information
- Aggregate Category – “Camera Enthusiast”
  - Does not record specific URL or search term
- Time Stamp – “10:23:45 October 12, 2009”
  - Maximum data life 6 months

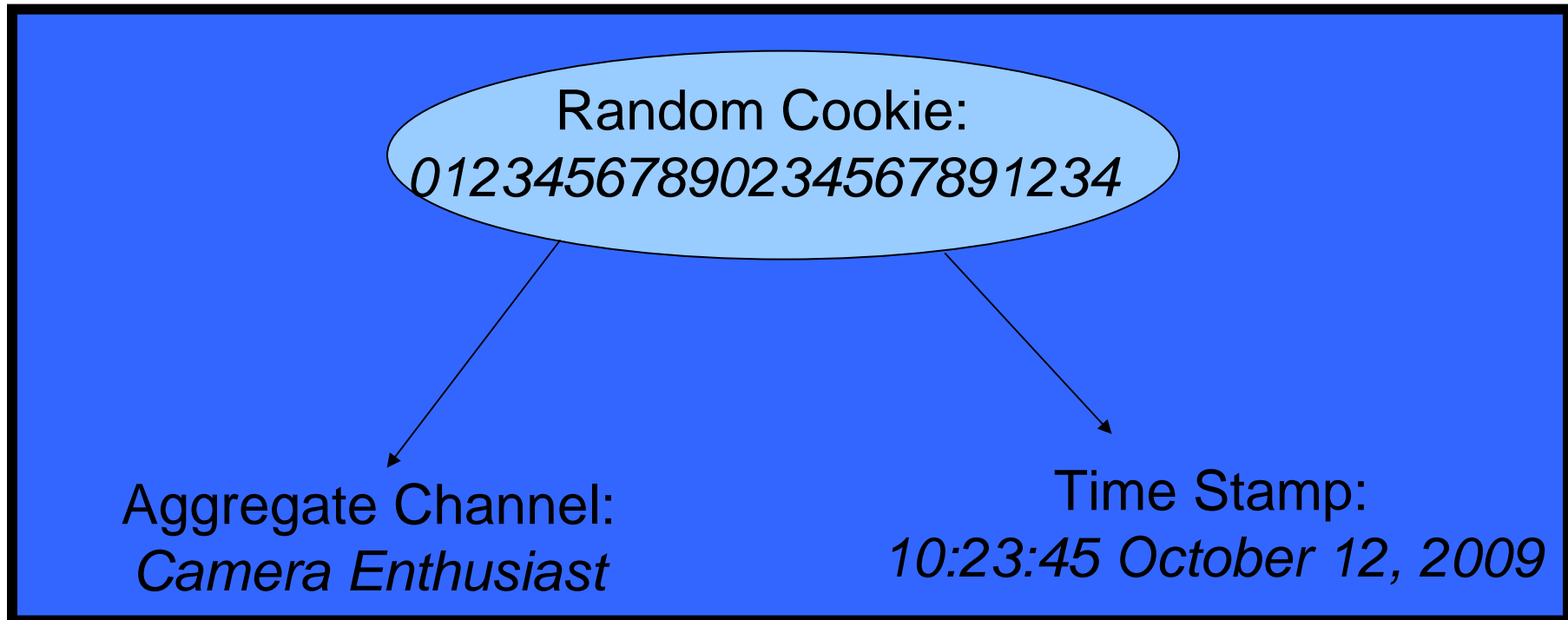
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## Cookie usage by Phorm



All Data Within ISP

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## What Phorm Can't Answer

- What the browser's IP address is
- What specific page, site or search term the browser has requested now or in the past
- Where the browser is physically located
- What type of browser, computer or operating system the cookie belongs to
- What products or services the cookie may have purchased
- The identity of the user

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# Transparency Notice and Choice

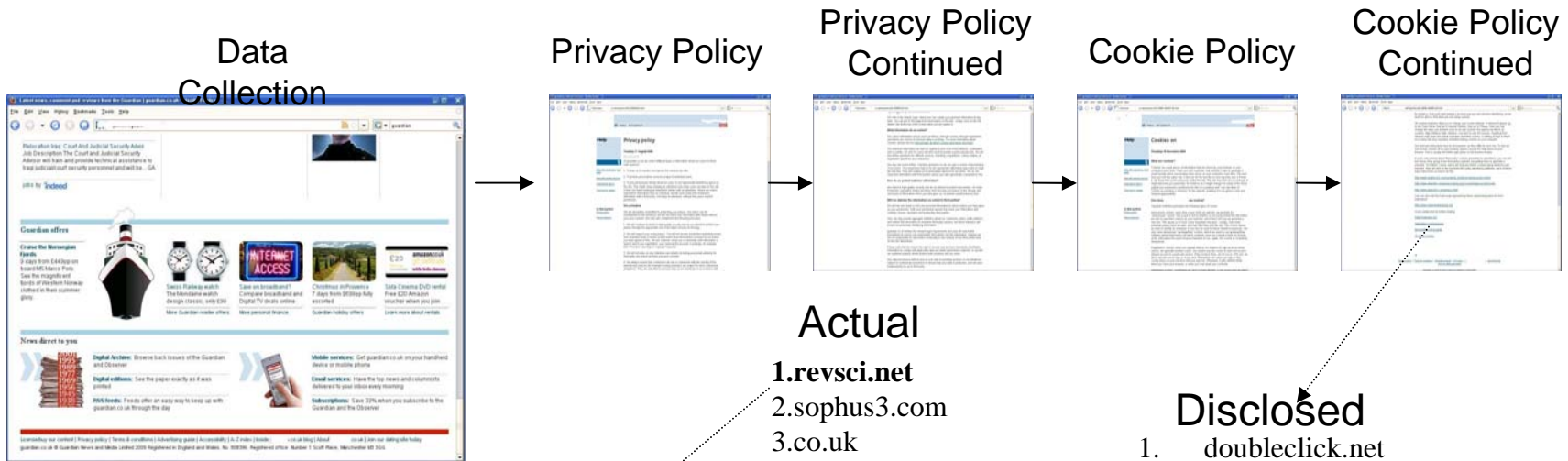
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## Discovery of typical player's practices



### Actual

- 1.revsci.net
- 2.sophus3.com
- 3.co.uk
- 4.digg.com
- 5.google syndication.com
- 6.indeed.com
- 7.realclearpolitics.com
- 8.2mdn.net
- 9.vizu.com
- 10.collective-media.net
- 11.doubleclick.net
- 12.pointroll.com
- 13.dl-rms.com
- 14.connextra.com
- 15.atdmt.com
- 16.technorati.com
- 17.llnwd.net
- 18.brightcove.com

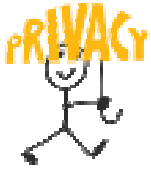
### Disclosed

1. doubleclick.net
2. atdmt.com
3. valueclick.com

### 3<sup>rd</sup> party Privacy Policy



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## Phorm's Notice and Choice

Switch On  
a personalised  
internet

A more interesting, relevant  
internet experience

Extra protection from  
online fraud

New, free service.  
No downloads.

Switch On >

Find Out More >

No Thanks >

Personalised content,  
less irrelevant advertising

How it works  
Interest matching, data collection and use

ISP Discover is a new free service that brings relevant content and advertising from across the web directly to you, wherever you are online.

It works by understanding your interests from the pages you visit. So, if you're interested in celebrities and

ISP Discover provides you with a personalised internet experience. To do this, the technology matches your interests to relevant content and advertising. Crucially, ISP Discover has been intentionally designed to preserve your anonymity and protect your privacy. This is achieved in the following way:

Step 1: We analyze your web browsing in "real time" by viewing the search terms.

- Notice is unavoidable
- Choice is prior to data collection
- Choice is meaningful:
  - Network based opt out
  - Opt Out is of data collection not of simply receiving behaviourally targeted ads
- **Provide a real consumer value exchange – Webwise Discover**

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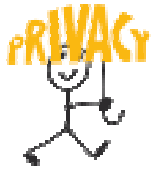
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## Introducing Webwise Discover Don't Search – Just Browse

- Webwise Discover delivers a personalised and more interesting internet experience by bringing relevant content from across the web directly to you, wherever you are online.
- Webwise Discover provides a direct consumer value for participation
- Webwise Discover allows any site to use a free widget to show its customers more engaging content within the site.

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# Discover provides consumers with relevant articles from across the web

My **Webwise.Discover** Homepage BETA [About](#) [Help & FAQ](#)  
Don't search, just browse

Sort by: **Relevance** Show: **All content** Results per page: **10**

Results for:

### Your most relevant discovers

**American team win 10th gold medal**  
The 23-year-old, who won silver in the 200m at last year's World Championships, was today awarded the tenth gold medal for the American team. Running the 100m for just the fourth time, the young athlete beat the previous best of 9.76...  
30 seconds ago  
SportCrazyS

**TV celeb out with new love interest**  
Reality TV Star who recently faced a £50m divorce battle after his affair with a camerawoman was seen out last night for the first time with his new love interest. The couple enjoyed a romantic meal, followed by drinks ...  
15 minutes ago  
WeeklyGossW

**Top UK Chefs favourite recipes**  
Season Five's winner of UK Top Chefs will be revealing all her recipe secrets in a new book to accompany her successful TV show. Watch a clip here of the first episode which was aired last Thursday at 9pm ...  
52 minutes ago  
TvTonightT

**Australia's tourist hotspot**  
The Sydney Opera House is the most popular landmark in Australia. The multi-venue performing arts centre was designed by Jorn Utzon in 1973 ...  
1 hour 11 minutes ago  
LoveAustraliaL

Keywords based on your browsing:

Olympic 100m final, celebrity love interest, Top UK chefs, recipes, Australian landmarks, action movie reviews, rock bands, car insurance, 4x4 reviews, catwalk fashion clothes, indie music festivals, mortgage advice, first-time buyer

Related to:  
Olympics, Cycling, 200m Hurdles, Olympic Village, Athletes return home  
share

Related to:  
Celeb love cheats, Footballers wives, custody cases  
share

Related to:  
Recipes, Restaurants, Bars, Cook Books  
share

Related to:  
Blue Mountains, Fraser Island, Great Barrier Reef, Ayers Rock  
share

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## Discover allows consumers to find deeper stories within sites

Example: Banner ad on publisher site

The screenshot shows the Guardian website interface. At the top, there is a navigation bar with links for 'Sign in', 'Register', and 'Text larger/smaller'. A search bar is located on the right. Below the navigation bar is a banner ad for 'guardianjobs BRAIN TRAINING GAMES' powered by 'Lumosity'. The main content area features a large 'sport' section with a 'Breaking news' alert: 'Dallas Cowboys send troubled Jones packing - Reuters'. Below this, there are several news articles, including 'Rovers reject £12m-plus Santa Cruz bid' and 'Derby County 1-0 Manchester United'. On the right side, there is a sidebar with a 'Webwise.Discover' section and a 'Britney Spears' section. The 'Webwise.Discover' section includes a search bar and a list of articles. The 'Britney Spears' section features a photo of her and a link to her official blog. At the bottom right, there is a 'Y IS ROW' logo.



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## Industry leading privacy and data practices

Users are only differentiated using a random number giving full anonymity

- Result: We cannot know who you are

No website addresses, searches or browsing history is stored

- Result: We cannot know where you have been

Users are presented with a screen offering unmissable notice and choice

- Result: Free and transparent choice with a direct consumer benefit

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