

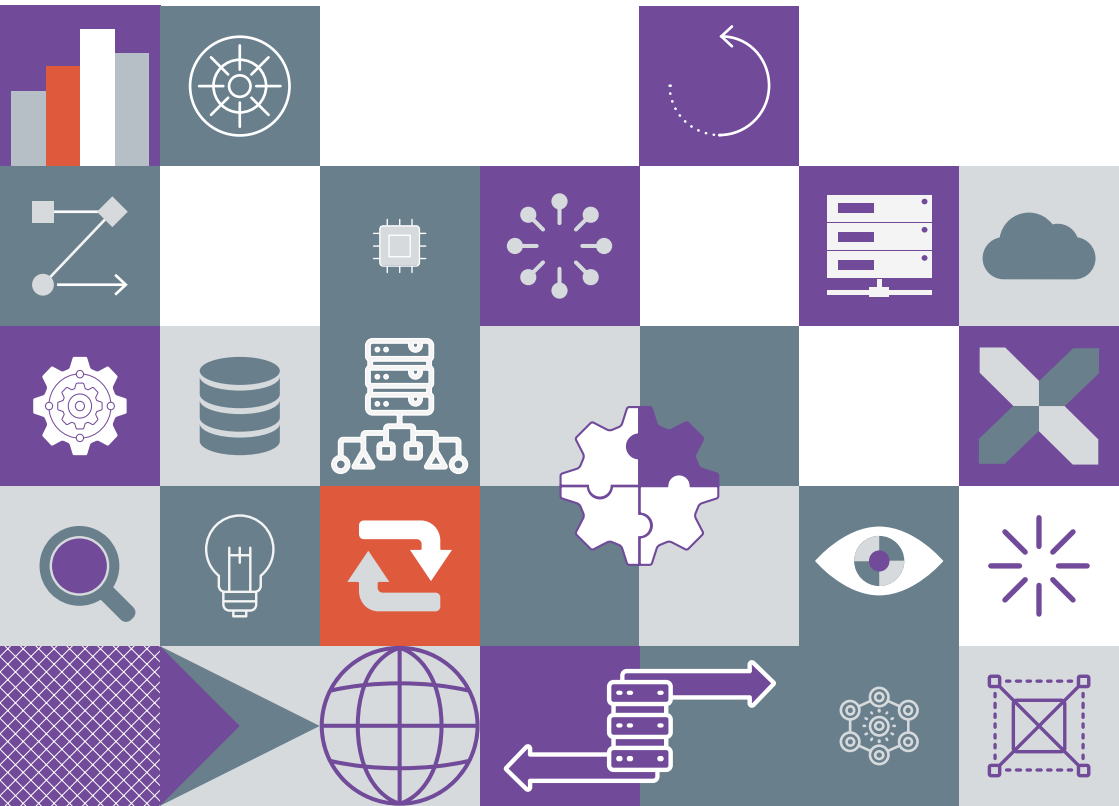


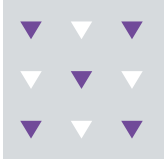
**LE PENSE
PAS BÊTE**

SRI
LES RÉGIES **INTERNET**

DATA PROCESSING

**RELATIONS BETWEEN
SALES HOUSES AND ADTECH VENDORS**





1 • INTRODUCTION & OBJECTIVES

The use of data has become widely democratized in the digital advertising sector, and its processing—when done in compliance with regulations—has become a major concern for digital Sales Houses, members of the SRI, and their Publishers.

However, the growing complexity and specificity of the Adtech ecosystem make it difficult to comply with a strict regulatory framework and lead to varying interpretations, contributing to a form of legal uncertainty. In light of this, the SRI and Digital DPO release this practical guide

This document facilitates the GDPR qualification process of the parties under applicable law (GDPR, Article 82 - Loi Informatique et Libertés, and Article 5.3 of the ePrivacy Directive), in order to clarify the roles and challenges between Adtech vendors and Sales Houses.

This guide compiles key facts and recommendations to consider in all discussions between Sales House and Adtech providers when personal data processing is involved. Detailed practical sheets on various types of actors and relationships are available for SRI members only.

The workshop participants develop here a shared vision of the advertising ecosystem and offer a common vocabulary compiled in a glossary listing the main terms used in this context.

These elements provide a framework for analysis aimed at simplifying the relationships between stakeholders. However, as digital advertising is a complex and ever-evolving sector, each relationship must be approached on a case-by-case basis.

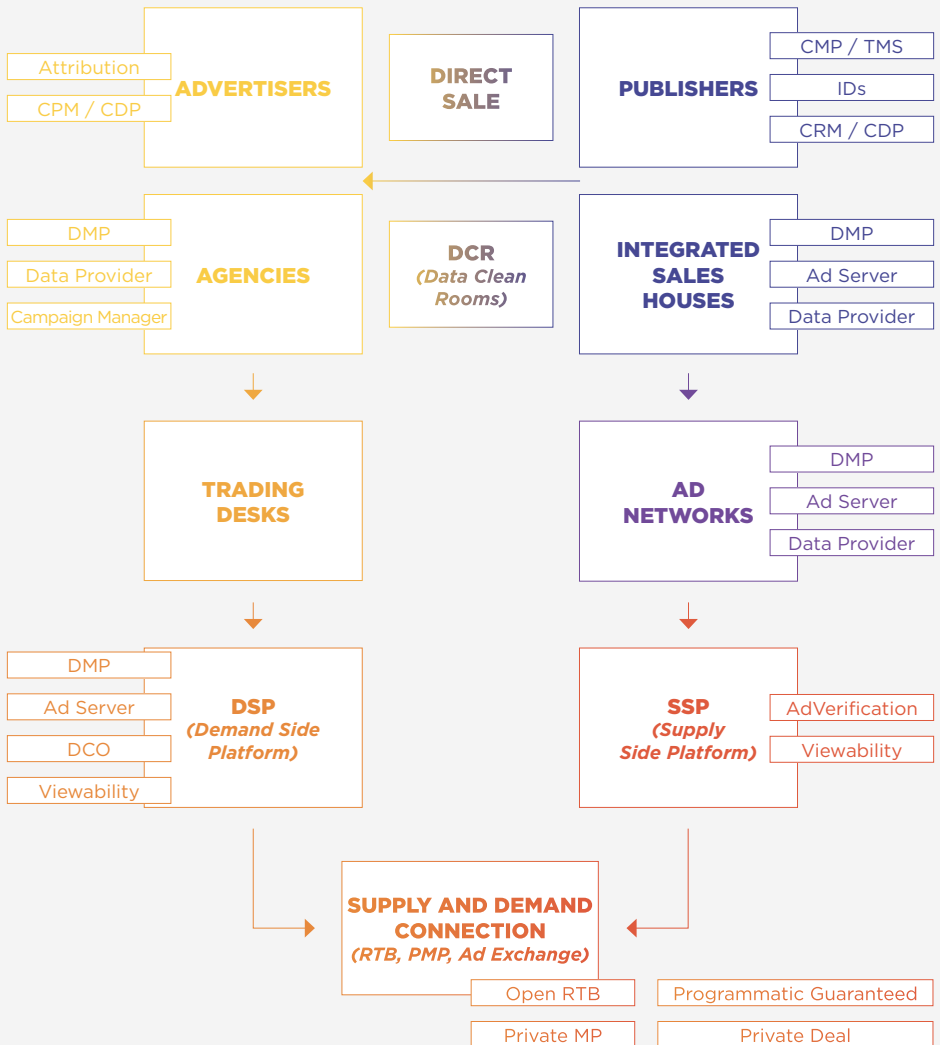


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Glossary

2 • THE ADVERTISING ECOSYSTEM

This section focuses on direct relationships of digital Sales Houses with the ecosystem.



Source : Digital DPO 2025

2 • FUNCTIONNALITIES OF ADTECH TOOLS

TOOLS / PARTNERS	MAIN BUSINESS FUNCTIONS	SECONDARY BUSINESS FUNCTIONS
ID Advertising Identifier	User identification (tracking)	Technical creation of the ID
		DCR (Data Clean Room)
		SSP (Supply Side Platform)
DCR Data Clean Room	Data cross referencing between actors	Data cleansing
		Identifier matching and identity resolution
		Profile enrichment
		Persona and lookalike modeling
		Measurement and optimization
		Sharing customer insights advertising purposes
SSP Supply Side Platform	Automation of the publisher ad inventory in the programmatic ecosystem	Ad serving
		Publisher profiles enrichment
		Third-party profiles enrichment
		Profiles activation for the publisher
		Profiles activation for third parties
		Reporting / measurement
DSP Demand Side Platform DMP Data Management Platform on behalf of Advertisers and Agencies	Delivery of advertiser campaigns on media managed by the Sales House with Data targeting	Activation of 1 st party advertiser data
		Activation of 1 st party publisher data
		Activation of cross 1 st party data
		Profiles enrichment / Data segments sharing with an advertiser in third-party environments
		Third-party profiles enrichment via forms
		Profiles enrichment via Special Operations and potentially DMP cookie or pixel drop
		Reporting
		Attribution analysis (pixels, tracked links)

REGULATORY GUIDANCE REMINDER

- Contracting parties may refer to the [EDPB's qualification framework](#) on a case-by-case basis to assess data processing responsibilities (see diagrams below) ;
- By exception, processors may reuse publishers' data. To do so, they must comply with [the CNIL's guidance on data reuse by processors](#) and obtain prior written authorization from the initial data controller, in the context of a compatible purpose.

It is essential that Adtech vendors communicate transparently and in details with Sales Houses / publishers on their data processing activities, in order to enable proper analysis and ensure full compliance

FOUR MAIN ISSUES RELATED TO CONTRACTING



**Protecting
the publisher's 1st party data
to ensure
its value is preserved**



**Qualifying
the parties
and consequences
in terms of compliance**



**Controlling
the conditions
of data processing
implementation**



**Ensuring
the ability to limit
further processing
(Data reuse and recipients)**

QUALIFICATION PROCESS FOR YOUR ORGANIZATION

Identify the specific personal data processing activity and its exact purpose.



Is another party involved in the personal data processing in question ?

Yes

No

- Do you decide :
- The purpose or purposes that the data will be processed for?
 - Which personal data collected that shall be collected and processed?
 - Which categories of Data Subjects that will refer to?
 - Whether the processed data shall be disclosed and to whom?
 - For how long the personal data will be stored?

Yes

You are
the Data
Controller

No

I carry out the processing on behalf of another party, in accordance with their instructions. I make decisions about certain non-essential means to be used (e.g., what IT systems or other technical means to use for the processing or details of the security measures based on the general security objectives set by other party).

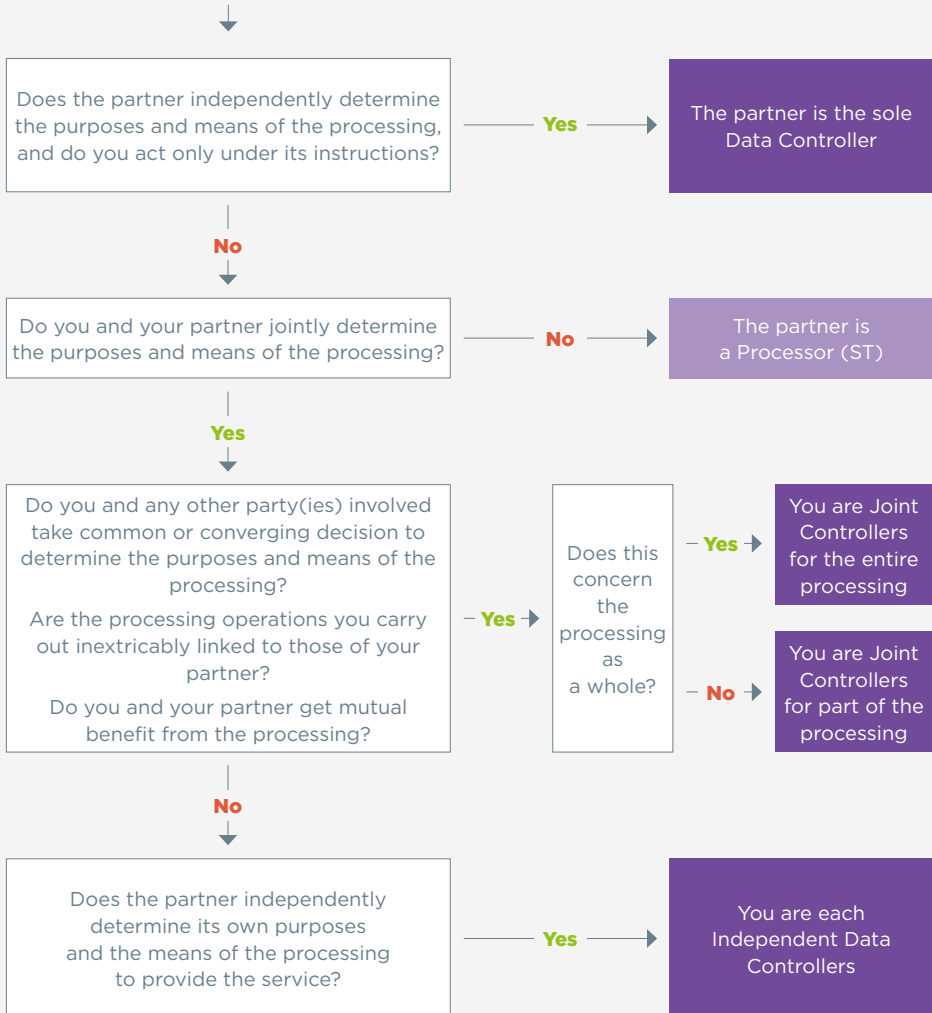
Yes

You are the
Processor

Source : EDPB, Guidelines 07/2020

PARTNER QUALIFICATION PROCESS WHEN YOUR ORGANIZATION IS A DATA CONTROLLER (DC)

Identify the specific personal data processing activity and its exact purpose.















Source : EDPB, Guidelines 07/2020

4 • KEY CONSIDERATIONS

In the context of an Adtech and Sales House/Publisher partnership, the following elements should be considered:

- Ensure consistency in the GDPR qualification of roles with regard to partner's types (see diagram – Partner Qualification Recommendations below)
- Explicitly define the conditions of reuse of the publisher's 1st party data by partners
- Verify the compliance of consent collection and traceability mechanisms (CMP design and valid consent)
- Implement appropriate technical and organizational measures to secure data processing and prevent disclosure to third parties
- Limit intrusive processing operations (e.g., fingerprinting, precise geolocation)
- Limit the number of recipients (selection of TCF vendors and direct partners)

RECOMMENDATIONS FOR PARTNER QUALIFICATION BASED ON THEIR FUNCTIONS

	ST	RT CONJOINT	RT INDÉPENDANT
IDs	 Standard qualification	 Standard qualification	 Irrelevant qualification
DCRs	 Standard qualification	 Irrelevant qualification	 Irrelevant qualification
SSPs	 Specific qualification	 Standard qualification	 Irrelevant qualification
DSPs / DMPs* [on behalf of Advertisers and Agencies]	 Irrelevant qualification	 Standard qualification	 Specific qualification

Note : Simplified presentation - each case must be assessed individually.

*applicable when the advertiser is activating their own first-party data

The purpose of the Glossary is to provide a common language that bridges technical, business, and legal perspectives, in order to facilitate the understanding of the advertising ecosystem.

PURPOSES AND FEATURES

Reminder of the IAB taxonomy¹: the TCF provides a sector-wide technical standard for digital advertising stakeholders, enabling the transmission of user preferences to recipients who have chosen to rely on it, via the consent signal² known as the “Consent string” or “TC string,” for advertising purposes selected by the recipients.

IAB Taxonomy

The TCF adopts a **specific technical taxonomy** to qualify advertising data processing activities in the context of digital advertising:

- The term **“Purposes”** refers to both processing operations and their corresponding purposes, which Vendors³ must declare before registering with the TCF. For these, the end user may give consent or object, depending on the legal basis for processing.⁴
- The term **“Special Purposes”** refers to specific types of data processing that are considered essential for the functioning of digital services and therefore do not require user consent.⁵
- **“Features”** refer to functionalities associated with processing that do not require a separate user choice beyond the main purpose — for example, combining data from different sources (such as online and offline data), or linking a user’s devices (i.e., cross-device tracking).⁶
- **“Special Features”**, which do require user consent, involve potentially intrusive processing activities such as geolocation and fingerprinting.⁷

1. IAB Europe Transparency & Consent Framework – Policies Version 2024-06-3.5.0 (see Chapter 5, Appendix A)

2. The consent signal is a pseudonymized string of digital signals that allows the storage and transmission of users’ choices regarding the use of their personal data for purposes related to advertising, content, and audience measurement.

3. Ibid. (p. 7, §1 pt.7). Vendors include advertisers and advertising intermediaries (AdTech) who enable the interfacing between the demand side and the supply side.

4. Ibid. (p. 7, §1 pt.12).

5. Ibid. (p. 7, §1 pt.13).

6. Ibid. (pp. 7–8, §1 pt.14).

7. Ibid. (p. 8, §1 pt.15).

PURPOSES (“P”)

PURPOSE	SCOPE
Purpose 1 – Store and/or access information on a device	P1 corresponds to the obligation set out in Article 5(3) of the ePrivacy Directive.
Purpose 2 – Use limited data to select advertising	P2 relates to contextual advertising ⁸ and frequency capping.
Purpose 3 – Create profiles for personalised advertising	P3 relates to advertising profiling and the selection of targeting/retargeting criteria.
Purpose 4 – Use profiles to select personalised advertising	P4 relates to advertising targeting or retargeting and/or dynamic ad creative optimisation.
Purpose 5 – Create profiles to personalise content⁹	P5 refers to profiling for the purpose of content personalisation (editorial or sponsored content).
Purpose 6 – Use profiles to select personalised content	P6 relates to content personalisation based on user profiles.
Purpose 7 – Measure advertising performance	P7 is aimed at measuring the effectiveness, viewability, and impact of digital ads, as well as analyzing user interactions with ads.
Purpose 8 – Measure content performance	P8 is aimed at measuring exposure, viewability, and performance of content, and analyzing user interactions with the content.
Purpose 9 – Understand audiences through statistics or combinations of data from different sources	P9 refers to aggregated reporting for advertisers and publishers on the characteristics of their audiences.
Purpose 10 – Develop and improve services	P10 involves service development and the creation of new models or algorithms through machine learning or experimental methods.
Purpose 11 – Use limited data to select content	P11 involves contextual content personalization.

Note : The “Purposes” serve both advertising and content personalisation goals, as well as more specific objectives such as measurement or product improvement.

⁸ The TCF uses the term “real-time data” to refer to contextual advertising. For example, this includes the use of information about the page content or app type, imprecise geolocation data, etc.

⁹ Content refers to elements of the service (e.g., products for an e-commerce service, articles and videos for a media company), and not to advertisements as such. (See TCF policies, p. 31)

SPECIAL PURPOSES (“SP”)

SPECIAL PURPOSE	SCOPE
Special Purpose 1 – Ensure security, prevent and detect fraud, and fix errors	SP1 is intended to be used by third parties operating on the publisher’s digital properties to detect advertising fraud.
Special Purpose 2 – Deliver and present advertising and content	SP2 is aimed at serving ads and presenting content.
Special Purpose 3 – Save and communicate privacy choices	SP3 is intended to demonstrate compliance with the accountability principle under Articles 5(2) and 24 of the GDPR, by storing and transmitting users’ privacy preferences.

FEATURES (“F”)

FEATURE	SCOPE
Feature 1 – Match and combine data from other data sources	F1 is intended to match and reconcile data from various sources (both online and offline).
Feature 2 – Link different devices	F2 aims to determine (either deterministically or probabilistically) that two or more devices belong to the same user or household.
Feature 3 – Identify devices based on information transmitted automatically	F3 aims to create an identifier from data automatically collected from a device (such as IP address or user agent) in order to attempt to re-identify the device.

SPECIAL FEATURES (“SF”)

SPECIAL FEATURE	SCOPE
Special Feature 1 – Use precise geolocation data	SF1 involves using geolocation data with a precision of up to 500 meters and/or latitude and longitude data with more than two decimal points.
Special Feature 2 – Actively scan device characteristics for identification (fingerprinting)	SF2 involves collecting data from the browser or device (such as time zone, fonts, screen resolution, and plugins) to create a unique identifier.

1. STAKEHOLDERS CO-CONTRACTING WITH SALES HOUSES

■ PUBLISHER / ONLINE SERVICE OR CONTENT PROVIDER

Any entity that professionally produces and publishes original content of general interest, subject to journalistic activities (e.g., traditional press titles and websites) made available to the public.

■ SALES HOUSE

Whether integrated, subsidiary-based, or independent, a Sales House may operate its own advertising inventory or that of another publisher. It manages the advertising space of one or more media (publishers) and sells its inventory directly to advertisers or indirectly through media agencies acting on behalf of advertisers.

■ AD NETWORK

Network/reseller that aggregates advertising inventory from various sources (media and SSPs) for in order to resell it.

■ ADVERTISER

A brand or company that promotes its product or service to a target audience in order to increase brand awareness, foster loyalty, and drive sales.

■ MEDIA AGENCY

An entity similar to a media buying hub acting on behalf of advertisers. It negotiates contracts on their behalf and acts as an intermediary between Sales Houses/ad networks and advertisers. The agency is responsible for campaign planning, budgeting, and optimization.

■ DATA PROVIDER (DATA BROKER)

A third-party data supplier whose business model relies on collecting personal data from various sources (online, offline, private, public), aggregating it, and selling or licensing it.

2. TOOLS

Tools can be classified according to their key functionalities into four main categories.

- > These categories are not strictly separated. The aim is to provide **a simplified overview** of the main functionalities of each tool (i.e., types of data processing)

TRACKING TOOLS (MONITORING AND MEASUREMENT)

■ ADSERVER

Management platform for advertising campaigns. It enables the scheduling and dynamic display of ads within designated spaces on web pages or mobile applications and provides campaign performance statistics.

■ IDENTIFIER / ID

String of characters allowing data association (browsing, transactional, etc.) from users or devices. It can vary in persistence and confidentiality. It is considered unique if shared among several actors within the same network. It may be deterministic or probabilistic and may be based on a hashed or not email address.

■ ADVERTISING ID

In mobile app environments, cookies cannot be placed. Therefore, the advertising ID is assigned by the mobile application, device, or operating system (OS) for advertising purposes such as targeting or frequency capping. Unlike a device ID, an advertising ID can be reset by the user at any time (i.e., it is not permanent).

■ ATTRIBUTION PLATFORMS

These platforms track user interactions with advertising campaigns and their distribution channels and the contribution of the campaign in the conversion. They provide insights into the campaign's impact on expected outcomes.

■ SDK (SOFTWARE DEVELOPMENT KIT)

Commonly identified as a framework of software and application creation tools for mobile operating systems (iOs, Android) embedded in the mobile application code of application publishers. An SDK can perform actions locally on a device or 'call' external services by transmitting data from the mobile device (geolocation data and mobile identifiers such as IDFA or UDID). This term can also be used in a web or CTV context.

■ WEB ANALYTICS

These include all audience measurement tools. They enable publishers to analyse the performance of their content by quantifying the audience and traffic of a website based on indicators such as the number of unique visitors, page views, visits, average visit duration (i.e., basic metrics).

■ TAG MANAGEMENT SYSTEM (TMS)

This is a SaaS platform that allows you to configure tags¹¹ that will determine the placement of trackers when events are triggered. These tags are computer codes used to track user behaviour.

¹¹ A tag refers to a piece of code used to send information from a web page to a server, typically in the form of an HTML tag. The information is transmitted through what is called a "Hit," most often an image file embedded within an HTTP request.

AD ACTIVATION TOOLS (PROFILING & TARGETING)

■ AD EXCHANGE / MARKETPLACE

The place where supply (SSP) and demand (DSP) meet, and where automated advertising transactions take place (in all formats: banners, takeovers, video, native, mobile, etc.).

■ DMP (DATA MANAGEMENT PLATFORM)

A data management tool that collects, segments, and activates user data from multiple sources. This includes various user touchpoints such as navigation and/or offline data (CRM, panel data, etc.), via CRM onboarding processes. For advertising purposes, this data is pseudonymized and reconciled through cookies and/or IDs.

■ DYNAMIC CREATIVE OPTIMIZATION (DCO)

A technique for dynamic ad creation that allows tailoring of the ad design and/or message based on the user's profile and the display context.

■ DSP (DEMAND-SIDE PLATFORM)

A real-time bidding optimization technology platform that enables advertisers to automatically purchase ad inventory impression-by-impression from various SSPs to which it is connected.

■ TRADING DESKS

Specialized services in the purchase and optimization of programmatic advertising space using one or more DSP.

■ SSP (SUPPLY-SIDE PLATFORM)

A technology platform that facilitates auction-based advertising among multiple buyers and optimizes the monetization of a publisher's inventory. The publisher/Sales House monitors its sales in real time, impression-by-impression, and in an automated way.

CUSTOMER INSIGHT ENHANCEMENT TOOLS

■ CDP (CUSTOMER DATA PLATFORM)

A SaaS-based platform that centralizes and stores all customer data (online and offline) in a unified omnichannel environment. It often combines the functionalities of a DMP and a CRM.

■ DATA CLEAN ROOM (DCR)

A SaaS-based platform that allows publishers and advertisers to share data in a secure and controlled environment.

■ CRM (CUSTOMER RELATIONSHIP MANAGEMENT TOOL)

A software solution designed to help businesses manage interactions with clients/prospects, with the goal of optimizing sales and marketing efforts.

TECHNICAL AND LEGAL COMPLIANCE VERIFICATION TOOLS

■ AD VERIFICATION

An automated platform that ensures ads meet quality criteria :

- Viewability measurement (whether ads are actually seen),
- Ad fraud detection (identifying non-human traffic),
- On-target delivery assessment (verifying that the audience matches the intended target - e.g., profile, country),
- Brand safety (ensuring ads are displayed in a context that doesn't harm the advertiser's image).

■ CMP (CONSENT MANAGEMENT PLATFORM)

A regulatory compliance tool that informs the end user about processing activities related to trackers placed on their device. It allows users to make choices regarding recipients and purposes and transmits those choices to the relevant partners, in line with the TCF standard.

DATA CLASSIFICATIONS

1. LEGAL CLASSIFICATIONS

PERSONAL DATA

■ PERSONAL DATA

Refers to “any information relating to an identified or identifiable natural person¹² [...] directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier [...]” (Article 3(a) of the GDPR).

■ DATA OF A HIGHLY PERSONAL NATURE

A sui generis category of data recognized by the EDPB WP29, which includes geolocation and financial data.¹³

■ SPECIAL CATEGORIES OF DATA

Also referred to as “sensitive data” this includes personal data that “reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, or data concerning a natural person's sex life or sexual orientation” (closed list under Article 9 of the GDPR).

12. In its Opinion 4/2007 on the concept of personal data, the EDPB WP29 considered that «as a general rule, a natural person can be regarded as 'identified' when, within a group of persons, they are 'distinguished' from all other members of that group. A natural person is thus 'identifiable' when, even if not yet identified, it is possible to do so (as the suffix '-able' implies).” (pp.13-15)

13. Guidelines on Data Protection Impact Assessment (DPIA) and determining whether processing is «likely to result in a high risk» for the purposes of Regulation (EU) 2016/679. Adopted on April 4, 2017, and last revised and adopted on October 4, 2017. EDPB WP29 248 rev. 01. (p. 11)

ELECTRONIC COMMUNICATIONS DATA

The terminology of the ePrivacy Directive is somewhat outdated, addressing only:

■ TRAFFIC DATA

Defined as “*any data processed for the purpose of the conveyance of a communication on an electronic communications network or for the billing thereof*” (Art. 2(b)).

■ LOCATION DATA

Defined as “*any data processed in an electronic communications network indicating the geographic position of the terminal equipment of a user of a publicly available electronic communications service*” (Art. 2(c)).

Despite the abandonment of the ePrivacy Regulation proposal, the SRI retains certain relevant and updated definitions. Electronic communications data refers to:

“The content of electronic communications and the metadata of electronic communications”:

■ ELECTRONIC COMMUNICATIONS METADATA

Defined as “*data processed in an electronic communications network for the purpose of transmitting, distributing or exchanging content of electronic communications, including data used to trace and identify the source and destination of a communication, location data generated in the context of providing electronic communications services, as well as the date, time, duration, and type of communication*” (Art. 3(m)).

■ CONTENT OF ELECTRONIC COMMUNICATIONS

Defined as “*the content exchanged through electronic communications services, including text, voice, videos, images, and sound*” (Art. 3(l)).

2. SECTOR-BASED CLASSIFICATIONS

■ PROVIDED DATA (SOMETIMES REFERRED TO AS 0 PARTY DATA)

Data that users voluntarily and proactively provide (e.g., through surveys and questionnaires).

■ 1ST PARTY DATA

Data collected directly from individuals who have interacted with the publisher or brand, including declared, observed, and inferred data in the context of that direct interaction.

■ 2ND PARTY DATA

Also known as partner data, these are data collected by a partner company and sold or exchanged through a data partnership (contract-based).

■ 3RD PARTY DATA

Third-party data generally collected and aggregated by specialized actors (e.g., retargeters, DMPs, data providers).



ABOUT THE SRI



The SRI ([Syndicat des Régies Internet](#)) is a French trade association regrouping [members](#), digital Sales Houses and sell-side [adtech partners](#).

The SRI and its members share their expertise and promote best practices for a responsible and sustainable digital advertising landscape. It also provides key information to understand the complexity of the digital advertising ecosystem, in particular through its report "[l'Observatoire de l'e-pub](#)".

