

1. Can you define the parameters of the market research exemption sought? Are we discussing longitudinal, shorter-term, or on-going campaign assessment?

**Answer:** We measure campaigns and the length of a campaign can vary from weeks to months – it is up to the client to decide. The campaign length is not tied to the data retention period during which there might be a need to re-run the data in case of duplicates or errors.

2. Can it be categorically said that none of the information collected and analyzed during will be used to target any user, inc. their device?

**Answer:** The information is not used for one on one targeting or to shape or personalize an individual user's experience. When companies commission research, the learnings are applied to a broader population. Publishers do not receive the browsing histories of individual visitors, or any raw data about individual visitors. They receive aggregated statistical data reports that describe general trends and characteristics. Industry codes including ESOMAR's and the DAA's underline the distinction between research and marketing. Market research is a one-way data stream. There is no return path to an individual user for any non-research purpose.

3. Is the proposal enabling outside First and Third Party data, even that which is connected to DNT:1, to be gathered, analyzed and further incorporated into an opt-in panel? Can examples be provided, using several diverse generic client examples (laundry soap A, sneaker B, credit card C, etc) of the process using the data? Specifically, it is key to understand exactly what is meant that data will be used to "calibrate or otherwise support data" from panels.

**Answer:** Audience measurement research does not enable unrelated first parties or third parties such as advertisers, media owners or e-commerce sites to directly join individual information collected under a permitted use with information they may hold about an individual user. Data from the permitted use is for calibrating the panel data to ensure it is more representative. The aggregated data can indicate broad characteristics (eg age-band and general area), and preferences for **broad** category preferences (likes skateboarding and donuts) but it cannot enrich the panel data, which is much more detailed and out of scope as it has consent.

4. Can a third party authorized to engage in audience measurement research use the data in any other way prior to the "statistical analysis" that requires pseudonymization?

**Answer:** it can be used for other permitted uses such as debugging or security and fraud prevention.

5. The 53 week outside deadline for de-identification. Please explain why a year is necessary for all such retention. While perhaps seasonal campaigns require a slightly longer retention period, analysis and market planning today is accomplished much faster today (for example, I just got my notice that the online data is ready to plan for next Xmas season based on what just happened last year). What retention time would be best practice with data needed for shorter campaign cycles?

**Answer:** Research audience measurement information is independently audited providing media buyers and advertisers with a third party validation of traffic to their sites to provide confidence in the numbers.

The data used by financial auditing bodies is based on metrics originating from this research - just as with print, one looks at annual circulation figures and the position of the ad to fix the rate. Core audience measurement metrics are unique visits, site visits and page views, number of visitors to a given website in a given period, and a general indication of geography.

Similar to print, the data is audited by bodies like ABC in the UK, MRC in the US, AGMA in Germany or OJD in France and Spain. They do this according to online audience measurement standards developed by technical specialists in joint industry bodies that represent each of the stakeholders with common definitions of what is being measured. They require that the data is retained because web traffic can be seasonal, eg holidays or impacted by the news or a fad. Sometimes data can be non intuitive and needs to be re-run to check if it is correct. Validation is important to provide confidence in the figures otherwise smaller websites (eg of small and medium enterprises) cannot compete in the media marketplace. Metrics are year on year.

Measurements of content are associated with a randomly selected series of numbers that compose an ID within a

cookie set on a browser. This cookie ID, by its nature, is pseudonymous, and it is impossible for audience measurement companies to ascertain the true identity of the user of a browser using only this cookie ID. The low sensitivity of the data and the impossibility of connecting it to a user's true identity would appear to be inline with guidance from Article 29 Working Party. The German Tele-Media Act gives a clear view on this and permits the usage of a cookie for market research (TMG Art 15.3\_ based on implicit consent.

The ID is not given to clients of audience measurement research, and is unavailable to employees of audience measurement companies with the exception of statisticians and engineers who may need to re-run data in cases of report error, disruption of continuity of business, etc. Any use outside of these purposes would be a violation of the company's privacy policy and subject the employee to sanctions.

Such data is not permitted to be rendered personal information in the possession of any agent, service provider or third party. The data that a client does receive consists of learnings in aggregate about consumption of content. Clients may analyze the data on their own and use their analyses to modify their offerings.

6. I don't understand the distinction being offered that measurement of a users device is not the same as an individuals. Online panels collect/analyze a broad array of data/user content behaviors, increasingly used in real-time. The results can be used to refine ongoing campaigns. If a user has a DNT:1, is the proposal saying, for example, that Nielsen can still tag them and have their data fed into the measurement for campaign regimes?

**Answer:** If a panel member has given explicit consent to be tracked for research purposes, but has turned on DNT:1, our view is that the research firm has obtained out-of-band consent for research tracking. A panel member that enables DNT:1 is effectively saying, "I have given permission for Nielsen to track me strictly for research, but I don't want other parties to track my browsing in order to serve targeted ads to me."

When panel members are exposed to content that a research firm is measuring, the output is de-identified aggregated, statistical data about the demographic profiles of individuals that viewed an ad or saw content on a website. This is because the panel research firm collects demographic profile data from its panel members when they register and join the panel.

When all other Internet users (not members of the research firm's panel) are exposed to content that is being measured, the research firm does not know their names, email addresses, age, gender, education, household composition or other demographic data. The research firm has an idea of their location based on their device's truncated IP address. This information may be used as a weighting factor in the calibration of panel data so that the panel output is adjusted and weighted to reflect the online population.

7. Please explain what data can be derived from the "sample quality control" and "auditing" process. Can it be used for any additional or supplemental targeting? Are there any other possible uses beside these two?

**Answer:** The key metrics for audience measurement research are unique visits, site visits, and page views in a given period. The panel data, joined with broader web data for calibration, may build a media planning currency or provide insight to media planners that a segment of panelists (and by extrapolation, web users) defined as cooking enthusiasts, for example, have high percentage of overlap with sports site visitation. Thus, a media planner who wishes to reach cooking enthusiasts may rely on reports generated using data from audience research measurement to buy media on cooking related sites as well as sports sites.

Thereafter, audience measurement research would inform whether, as planned, media was delivered to websites having those audiences. As implied, these categories are broad and define online audiences similar to how measurement using panel demographic segments helps planning for traditional media. Sample quality control and auditing do not produce a separate stream of data that is distinct from original processing. Any re-run of the data is intended to verify that it was processed correctly. Audience measurement does not facilitate direct return path commercial products such as behavioral targeting or re-targeting.

8. Please provide further context and parameters for the market research purposes. Can we have specifics on what is meant by "facilitating online media valuation, planning and buying and reliable audience

measurement." Can we have examples in each of the categories, inc. how it is used commonly in the marketplace, esp. given the changing nature of real-time campaigns.

**Answer:** As mentioned above, we are at a stage in overall media planning where marketers tend to spend only if they can get reliable accountability for their marketing dollars. Research and measurement have historically informed that critical process of understanding. Audience measurement research is built on panels. The panels are formed on the basis of demographic (name, region, age, etc) attributes along with interest and attitudinal inputs given by panelists. The online activities of panelists inform the segments that are used to measure whether an advertiser's intended audience can be reached by advertising on certain sites.

At a fundamental level, audience measurement research confirms that certain demographic groups (example, males 25 to 34) can be reached by advertising on certain sites. Intuition suggests that sports sites may have a high proportion of that segment but audience measurement research is able to confirm that with statistically reliable data. The same panelists known by age or gender within the panel may be defined as sports enthusiasts by the advertiser client, agency or other) who receives the audience measurement research report. In that case, audience measurement research is able to help the client understand how it should build its media planning in order to reach sports enthusiasts. As earlier submitted, audience measurement research is based on opt-in panels and the broader web data is used to calibrate or weight the panel audience so that certain confidence levels are reached.

9. The phrase "optimizing content and placement on an individual site" sounds like real-time targeting. Please also place this purpose in context through explanation on how exactly such data will be used; examples appreciated.

**Answer:** Optimization is a term that can have different meanings depending on industry and context. Optimization as used in behavioral targeting is not a practice that falls within audience measurement research. "Real-time" can also have different meanings depending on setting. For purposes of audience measurement research, data can be aggregated theoretically at any point in time or 'real time', and the resulting reports may then be analyzed by clients. To be clear though, this is not in any way akin to behavioral targeting or re-targeting based on 'real-time' data.

Audience measurement does not facilitate one-to-one retargeting. In addition to basic media planning, aggregated reports from panel data may allow clients to do things like 1) modify the background color of their site if the report suggests that a content page with a blue background is getting more visits than a content page with a red background 2) create more sports content if a client's analysis of report reveals that sports content on a general interest site are consumed more frequently than other categories 3) offer free shipping on all their products if their analysis of report shows that there is more traffic to product offerings with free shipping rather than paid shipping. 4) set advertising rates that are higher on more heavily trafficked portions of their site, allowing the site to maximize its profitability.

No panel can accurately or completely represent all the traffic, including international, to a website. The internet is a much more fragmented and global medium than traditional media and growth and usage worldwide are much more dynamic.

For instance, many sites are too small to generate a statistically robust audience from a panel. It may be impossible to build a sample size large enough to fully represent internet traffic or visitation activities with more than 33 billion web pages available. Audience measurement research help advertisers better plan their media campaigns and the panel foundation with broader data for calibration ensures that larger sites are not overstated and smaller ones ignored in online traffic numbers.