

# A Study on Subject Data Access in Online Advertising after GDPR

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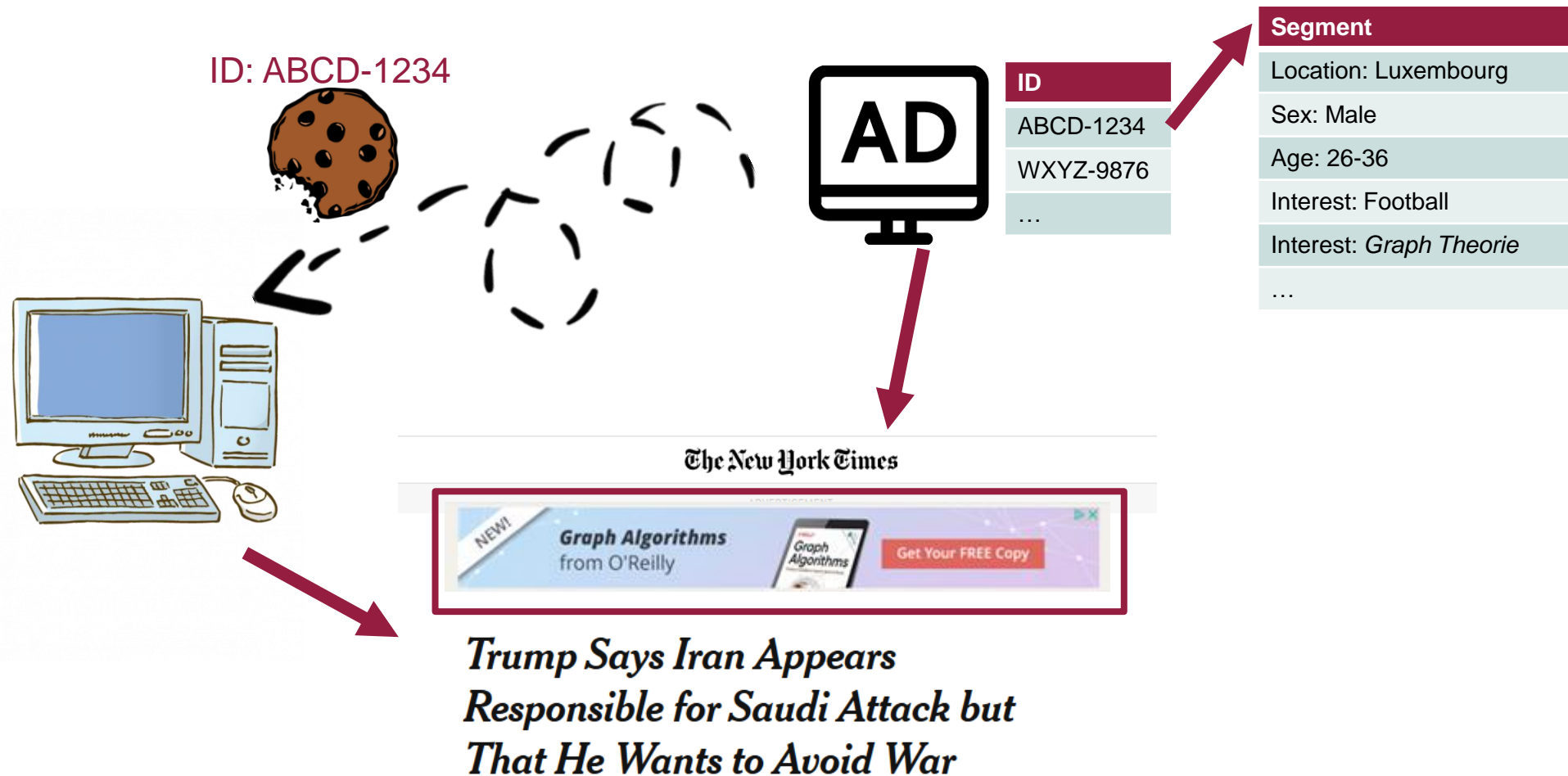
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- Services track users and collect personal data
  - often without explicit consent
  - to provide target ads
- The *General Data Protection Regulation* (GDPR)
  - harmonizes data protection laws through the EU
  - introduces new rights for users
  - compliance is required for any company that offers services in the European Union



# How does online advertisement work?

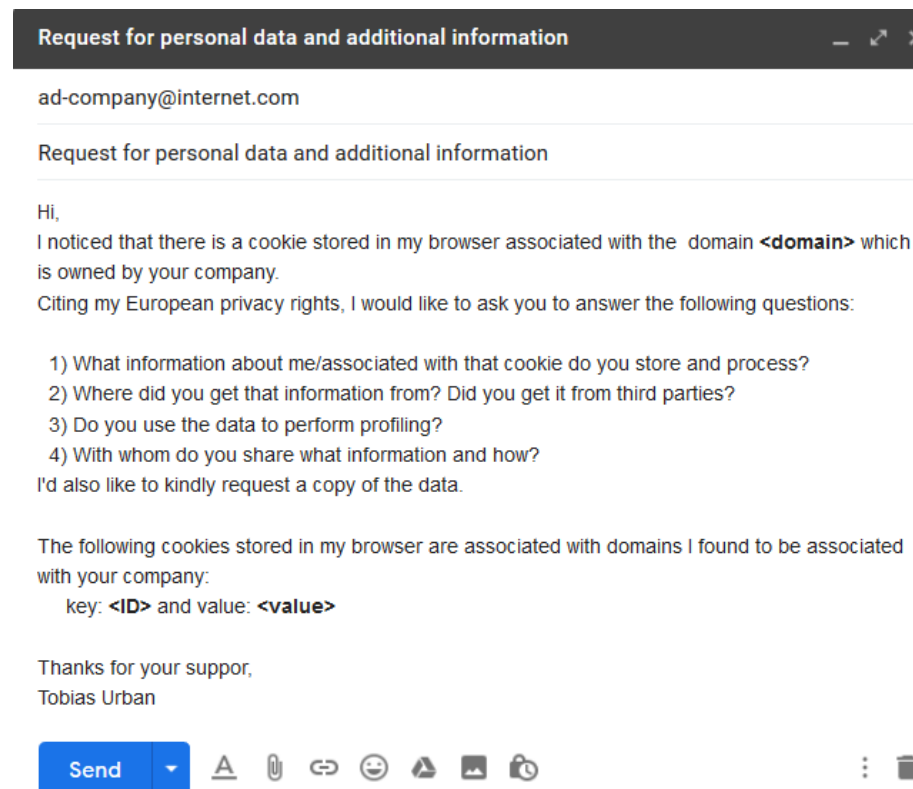


Houthi rebel fighters in Sana, Yemen, in August. United Nations experts say Iran has supplied the group with drones and missiles. The type of weapon used in Saturday's attack was not yet certain.  
Hani Mohammed/Associated Press

- Situation
  - Services track users to provide targeted ads
  - The GDPR aims to allow users to (re)gain control of their data
  
- This leads to the question:

Can users access personal data online advertisement companies collected?

- We exercised our *right to access* with 38 companies
  - 2 rounds of inquires
  - 32 / 27 via email and 6 / 11 via online form



# What happened....

## Case Example 1



Please send us a signed **affidavit** and a copy of an official **government issued ID**.

It is necessary for comparison in our system.

Sorry, we do not have any data linked to cookie ID: *ABCD-1234*



Please provide me a copy of my data.  
My cookie ID is: *ABCD-1234*

Why? How do you link my cookie ID with my ID card?



# What happened....

## Case Example 2



Which **email** did you use to register at our service?

*(10 work days later...)*

Please call our customer service.



Please provide me a copy of my data.  
My cookie ID is: Z9Y8X7W6

None. I am not registered at your service.  
I only have this cookie ID.

# What happened...

## Case Example 2



Please name us your email address.

That is no problem we simply  
your email address.

We do not have an account  
associated with this email.

Please create a ticket on  
this matter, we will handle it  
from there.

**Ticket created**

**Reply: Please call our  
customer service**



I am not registered at your service

urban@internet-sicherheit.de

I know...

Nevertheless, you collect data about  
me associated to the named cookie  
ID



# What happend...

## Case Example 3

The privacy portal requires ad blockers to be disabled to access your information. You may re-enable at the end of your session.

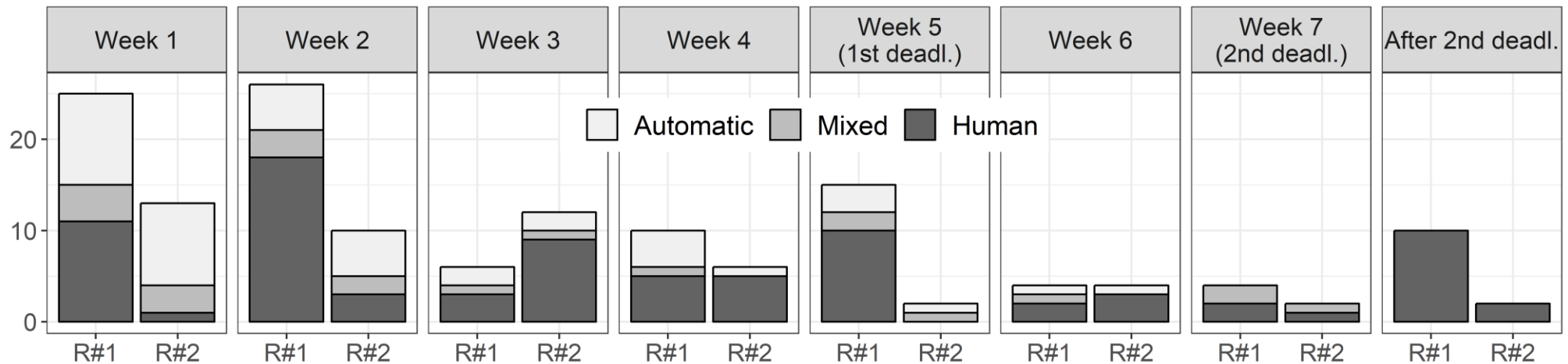
Device Type:

Browser

Segment Name ▲	Member
ADI - Reading,Books,Literature,Magazines - CC (6261)	Advance Internet <a href="#">Remove on the Platform</a>
ADI - Relationship - Engaged - CC (0023)	Advance Internet <a href="#">Remove on the Platform</a>
ADI - Retired - CC (6182)	Advance Internet <a href="#">Remove on the Platform</a>
ADI - Running, Physical Fitness - CC (5073)	Advance Internet <a href="#">Remove on the Platform</a>
ADI - Seniors interested in travel	Advance Internet <a href="#">Remove on the Platform</a>
ADI - Services - Health Medicine - Extension	Advance Internet <a href="#">Remove on the Platform</a>
ADI - Sewing, knitting, needlework, arts & crafts (CC) (c0254)	Advance Internet <a href="#">Remove on the Platform</a>
ADI - Shopping - Home and Garden - Appliances - Extension	Advance Internet <a href="#">Remove on the Platform</a>
ADI - Smoker - CC (3062)	Advance Internet <a href="#">Remove on the Platform</a>
ADI - Student - CC (6174)	Advance Internet <a href="#">Remove on the Platform</a>

# Results Timing

- 2 deadlines
  - 30 days after inquiry
  - 30 work days after inquiry



*automatic* := automatic response  
*mixed* := response probably by a machine  
*human* := response by a human

# Results Success

Status	R1		R2		
Accepted	14	22%	3	22%	22%
No Data	<b>Question</b>		<b>R1</b>	<b>R2</b>	
Denied	Data	21	23		36%
Not finished	Sources	6	6		3%
No response	Profiling	9	6		25%
	Sharing	7	4		14%

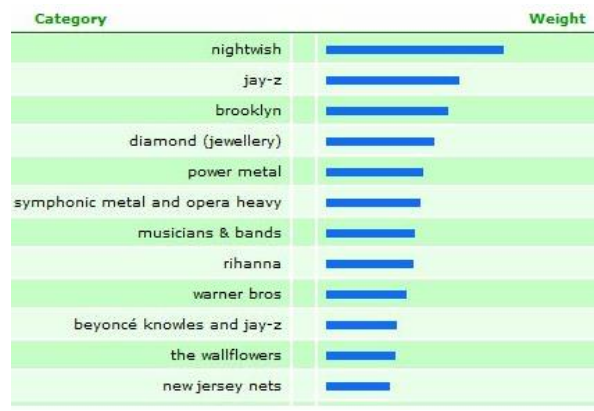
# Results Responses

Segment Name ▲	Member	
	Criteo Corp <a href="#">🔗</a>	<a href="#">Remove on the Platform</a>
	Criteo Test Bidder <a href="#">🔗</a>	<a href="#">Remove on the Platform</a>
Adelphic Usersync New	Adelphic, Inc.	<a href="#">Remove on the Platform</a>
Adpilot_internal_targeting	Cloud Technologies S.A. <a href="#">🔗</a>	<a href="#">Remove on the Platform</a>
B2B_Feature_No Account	Wayfair (Sell side)	<a href="#">Remove on the Platform</a>
CCS_Group 2_CCS2 - Copy	Oracle Customs (1st, BlueKai, Datalogix, AddThis) <a href="#">🔗</a>	<a href="#">Remove on the Platform</a>
Criteo EU	Criteo Corp <a href="#">🔗</a>	<a href="#">Remove on the Platform</a>
Criteo Seg APAC	Criteo Corp <a href="#">🔗</a>	<a href="#">Remove on the Platform</a>
DataXu_Usersync_Global	DataXu <a href="#">🔗</a>	<a href="#">Remove on the Platform</a>
Libra - Wayfair US (Waystack)	Wayfair (Buy side)	<a href="#">Remove on the Platform</a>
MX-SCH-SMMX-Users	Schibsted Media Group	<a href="#">Remove on the Platform</a>

Type	R1	R2
Raw	9	3
Human readable	5	5
<b>Segments</b>	4	4
Tracking	3	3
Location	4	4
Others	5	2

These are some of the interests matched to you based on your profile and activity. You can adjust them if something doesn't look right.

- Business news and general info
- Comedy
- Comedy
- Commentary
- Computer gaming
- Computer reviews
- Digitale Themen & Netzpolitik
- Education news and general info
- Financial news
- Geography
- Google
- Google I/O 2018
- Government
- Mobile
- Movies / Tv / Radio
- News / Politics
- Online gaming
- Physics



# Results Responses

time	url	ip	gdprQCCConsent	cookieIn	type
Mon Sep 24 09:29:25	https://www.ladepêche.fr/	-1033994496	1	5ba8a46b-987b9-2ce27-93e48	APPNEXUS
Mon Sep 24 09:28:04	https://www.ebay-kleinanzeigen.de/	-1033994496	1	5ba8a46b-987b9-2ce27-93e48	CASALE
Mon Sep 24 09:24:19	http://dailycaller.com/section/daily-vaper/	-1033994496	1	5ba8a46b-987b9-2ce27-93e48	APPNEXUS
Mon Sep 24 09:24:18	http://segapi.quantserve.com/api/segments.json?	-1033994496	1		
Mon Sep 24 09:17:29	http://style24.it	-1033994496 x		5ba8a46b-987b9-2ce27-93e48	BIDSWITCH
Mon Sep 24 09:16:19	https://www.pistonheads.com	-1033994496	1	5ba8a46b-987b9-2ce27-93e48	GOOGLE
Mon Sep 24 09:16:17	https://www.pistonheads.com/	-1033994496	1	5ba8a46b-987b9-2ce27-93e48	APPNEXUS
Mon Sep 24 09:10:44	https://myfav.life/	-1033994496	1	5ba8a46b-987b9-2ce27-93e48	APPNEXUS
Mon Sep 24 09:09:36	https://www.kompas.com/	-1033994496	1	5ba8a46b-987b9-2ce27-93e48	PUBMATIC
Mon Sep 24 09:05:05	https://www.farfeshplus.com	-1033994496	1	5ba8a46b-987b9-2ce27-93e48	GOOGLE
Mon Sep 24 08:58:43	https://www.journaldesfemmes.com/	-1033994496	1	5ba8a46b-987b9-2ce27-93e48	APPNEXUS
Mon Sep 24 08:54:41	https://www.newsru.com	-1033994496	1	5ba8a46b-987b9-2ce27-93e48	GOOGLE

Type	R1	R2
Raw	9	3
Human readable	5	5
Segments	4	4
Tracking	3	3
Location	4	4
Others	5	2

## You were seen in the following sites:

Last seen on	Site	IP
2018-09-24 08:51:01	https://www.01net.com/	194.94.127
2018-09-24 08:53:11	https://ad3.adserver01.de/www/delivery/Ljc	194.94.0
2018-09-24 09:05:06	https://www.farfeshplus.com/	194.94.127
2018-09-24 09:15:50	https://www.wetter.de/	194.94.127
2018-09-24 09:16:31	https://www.pistonheads.com/	194.94.127
2018-09-24 09:18:59	https://ad6.ad-srv.net/request_content.ph	194.94.127

- Initial we asked ourselves:

Can users access personal data  
online advertisement companies collected?

- We found that :
  - Only some companies replay (55 %)
  - Provided data is inconclusive
  - The process can be tedious (e.g., due to obstacles)

→ If user can exercise their *right to access*, the success/usefulness is *depended* on the inquired *company*

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Thank you for your attention!  
Are there questions?



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