

# **Analysis of Ad-Targeting Privacy Policies and Practices**

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**privacychoice.org**

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**Overview**

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Sharing  
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Deletion  
Opt-out availability  
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recommendations

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Technology requirements  
Website requirements

# PrivacyChoice Background

## Mission

To develop and demonstrate technologies to make consumer online privacy choices understandable and actionable

## For consumers

Index of tracking companies present on popular websites

Two-click opt-out wizard

*Enables consumers to opt-out completely or selectively from up to 106 networks based on their policy preferences*

Browser add-on for Firefox (IE in alpha testing)

*Protects and automatically updates opt-out settings (including Flash cookie control)*

TrackerWatcher browser add-on

*Shows tracking companies and policies for any page*

## For websites

PrivacyWidget

*Free service for any website to automatically deliver enhanced consumer disclosure and choice. Integrated with add-on to preserve consumer preferences.*

## PrivacyWidget

Implements on any website in minutes with six lines of Javascript code

Consumer can open from a link placed in any text, icon or tab

Lists all targeting networks present on the webpage and/or site

Provides company descriptions, privacy-policy excerpts and opt-out links

Requires no ad-network backend changes

Available now for pilot testing

The screenshot displays the 'Privacy and Ad Preferences' interface. It features a navigation bar with 'Overview', 'Other Companies', and 'Learn More' tabs. The main content area is titled 'Tracking companies on this page' and lists several companies with their respective policies and opt-out links. Below this, there is a section for 'Other tracking companies on this site'. At the bottom, there is a 'PrivacyWidget' logo, a 'Feedback please' link, and an 'Opt out of all' button.

Tracking companies on this page		
aCerno (Akamai) ▼	Policies ▼	Opt out
Advertising.com (AOL) ▼	Policies ▼	Opt out
Aggregate Knowledge ▼	Policies ▼	Opt out
Akamai ▼	Policies ▼	Opt out
AlmondNet ▼	Policies ▼	Opt out
AudienceScience ▼	Policies ▼	Opt out
BlueKai ▼	Policies ▼	Opt out
Yahoo! Ad Network ▼	Policies ▼	Opt out
Other tracking companies on this site		
aCerno (Akamai) ▼	Policies ▼	Opt out

PrivacyWidget      Feedback please      Opt out of all

# Methodology

## Comprehensive database of ad-targeting company policies and practices

173 companies, including ad networks, exchanges and optimization platforms

For each ad-targeting company, the data include:

*Tracking domains used*

*Opt-out cookies and opt-out URLs*

*Key privacy-policy classifications and excerpts*

*Utilization of Flash cookies*

Policies and opt-out operations are continuously monitored and updated

## Database of ad-targeting company presence on top websites

Spider regularly samples pages for presence of ad-targeting companies

*Selective weekly sample of most popular pages (based on search engine listings) and individual pages scanned by 25,000 TrackerWatcher users*

# Ad-targeting companies studied

<b>[x+1]</b>	<b>Akamai</b>	CPX Interactive	Lucid Media (Clicksense)	Rubicon Project
<b>24/7 Real Media</b>	<b>AlmondNet</b>	<b>Criteo</b>	<b>Media6degrees</b>	<b>Safecount</b>
33across.com	Amazon Associates	Dapper	mediaforce	ScanScout
Accelerator-media	<b>AOL Behavioral Targeting (Tacoda)</b>	DataXu	MediaMath	ShareThis
<b>aCerno (Akamai)</b>	<b>AOL Sponsored Listings (Quigo)</b>	Datran Media	<b>Mediaplex</b>	Shorttail Media
Axciom (Relevance-X)	ASDAQ (ContextWeb)	Demand Media	Mediawhiz	SMART AdServer
Ad Frontiers	Ask.com (askeracer)	Dotomi	<b>Microsoft (Atlas Technology)</b>	Snapshots
AdAdvisor (Targus)	<b>AudienceScience</b>	Eloqua	Microsoft (live.com)	<b>SpecificMEDIA</b>
adap.tv	Batanga	e-planning	<b>Mindset Media</b>	SpotXchange
Adaptive Ads	Baynote	Etology	Mpire (Widgetbucks & AdXpose)	Sprout
Adblade	beencounter	eType	Navegg	Struq
AdBrite	Bizo	<b>eXelate Media</b>	<b>Next Action</b>	Tatto Media
Adcentric	Blogads	Eyeblaster	NexTag	Tealium
Adconion	<b>Blue Lithium</b>	Eyeconomy	nugg.ad	Teracent
AddKick	<b>BlueKai</b>	Eyewonder	OpenX	TradeDoubler
AddThis	BlueStreak	Facilitate Digital	Optimax (Casale)	<b>Traffic Marketplace</b>
addtoany	brand.net	Factor TG	Oridian	TRAFFIQ
Adfusion	BridgeTrack	<b>FetchBack</b>	otracking.com	Tremor Media
Adify (100+ networks)	Brightcove	flashtalking	outbrain	<b>Tribal Fusion (Exponential)</b>
adInterax (Yahoo!)	BrightRoll	<b>Fox Audience Network</b>	OwnerIQ	TruEffect (AdLegend)
AdJuggler	BTBuckets	Freewheel	peer39	<b>Tumri</b>
AdKnowledge	<b>Burst Media's adConductor</b>	<b>Google (DoubleClick)</b>	<b>Permuto</b>	<b>Turn</b>
Admeld	Channel Intelligence	gumgum	Pointroll	Unanimis
AdMotion	CheckM8	Gunggo	Popular Media	<b>Undertone Networks</b>
AdOn Network	Chitika	Hitbox (Omniture)	PrecisionClick	<b>ValueClick (Fastclick)</b>
Adotube	ChoiceStream	IAC Advertising Solutions	proximic	Vibrant Media
adParlor	ClearSight Interactive	Insight Express	Pubmatic	Videoeegg
AdPerfect	Clearspring	<b>interCLICK</b>	Pulse360	Vizu
Adperium	Clickability	interpolls	QuadrantOne	weborama
AdRoll	Clickhype	Invite Media	<b>Quantcast</b>	widgetbox
AdShuffle	Clicksor	Kontera	Reinvigorate	XGraph
AdTech	ClipSyndicate	LifeStreet Media	<b>RichRelevance</b>	<b>Yahoo! Ad Network</b>
Adtegrity	Collarity	Lookery	Right Media (Yahoo!)	YuMe Networks
Advertising.com (AOL)	<b>Collective Media</b>	<b>Lotame (CrowdControl)</b>	Rocket Fuel	
<b>Aggregate Knowledge</b>	Commission Junction			
	Connextra			
	ContextuAds			

Includes ad-related networks or platforms that appear to collect or use consumer information for advertising across multiple sites.

NAI membership in **bold**

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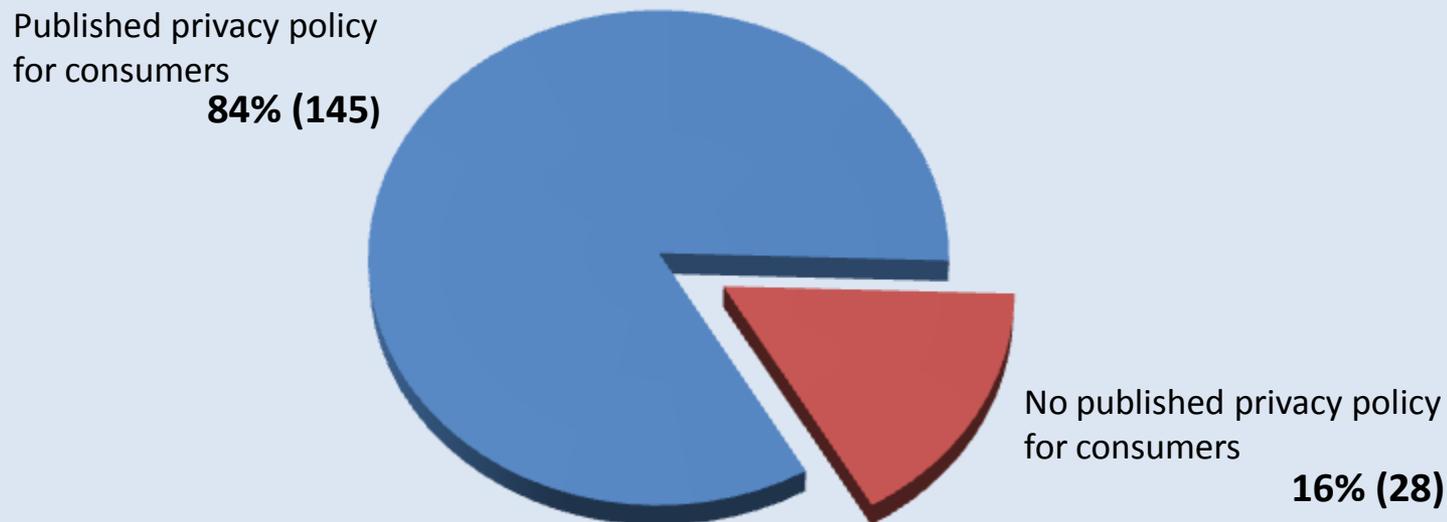
**Anonymity**  
**Sharing**  
**Out-of-Bounds**  
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**Industry oversight**  
**NAI coverage**

## Conclusions and recommendations

Disclosure requirements  
Technology requirements  
Website requirements

# Policies

**Not all ad-targeting companies have consumer privacy policies**

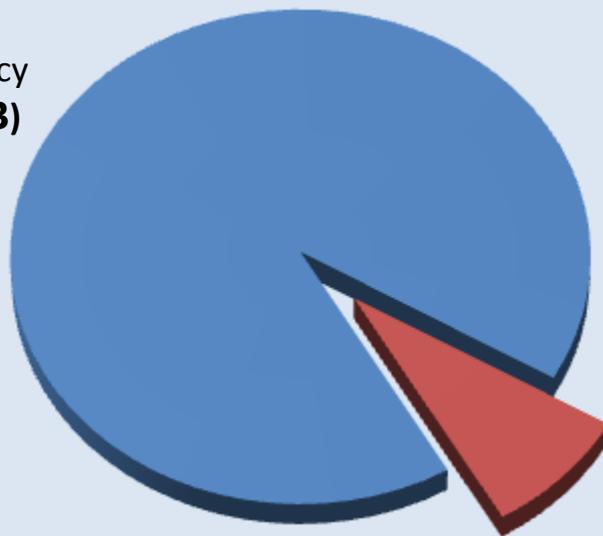


In many of these cases, companies have a corporate privacy policy that does not apply to consumers.

# Anonymity

**Nearly all ad-targeting companies promise to keep you anonymous**

Anonymity confirmed in policy  
**92% (133)**



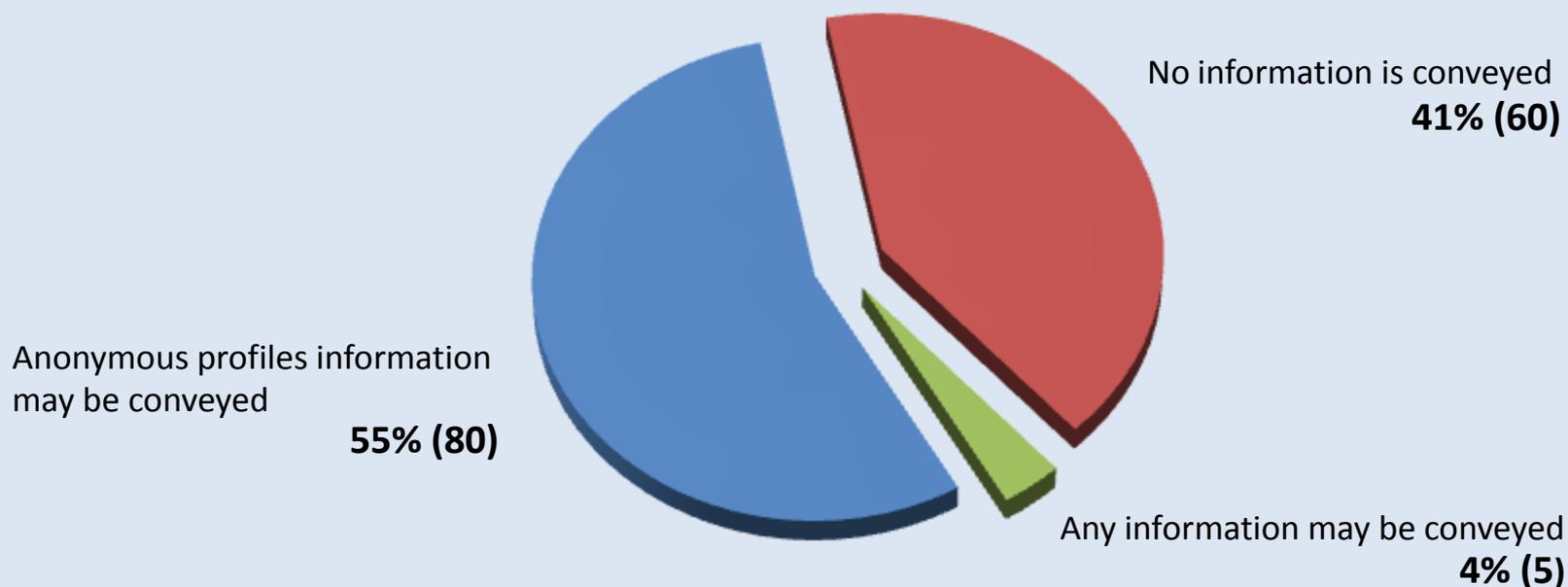
Anonymity not confirmed in policy

**8% (12)**

A company confirms anonymity by stating that they do not collect personally identifiable information or that they do not associate it with your activities and interests.

# Sharing

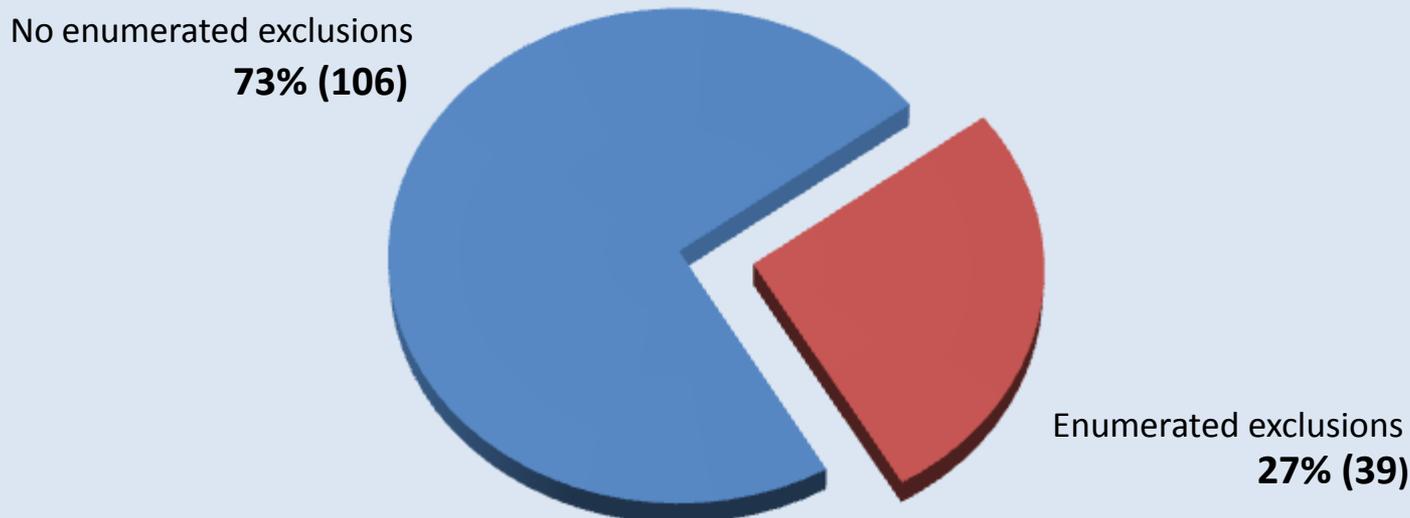
## Policies of most ad-targeting companies permit conveyance of anonymous profile information



“Convey” does not include sharing with vendors, transfer in an acquisition, or pursuant to other legal process. Some policies provide that information is only shared under confidentiality agreements.

# Out-of-Bounds

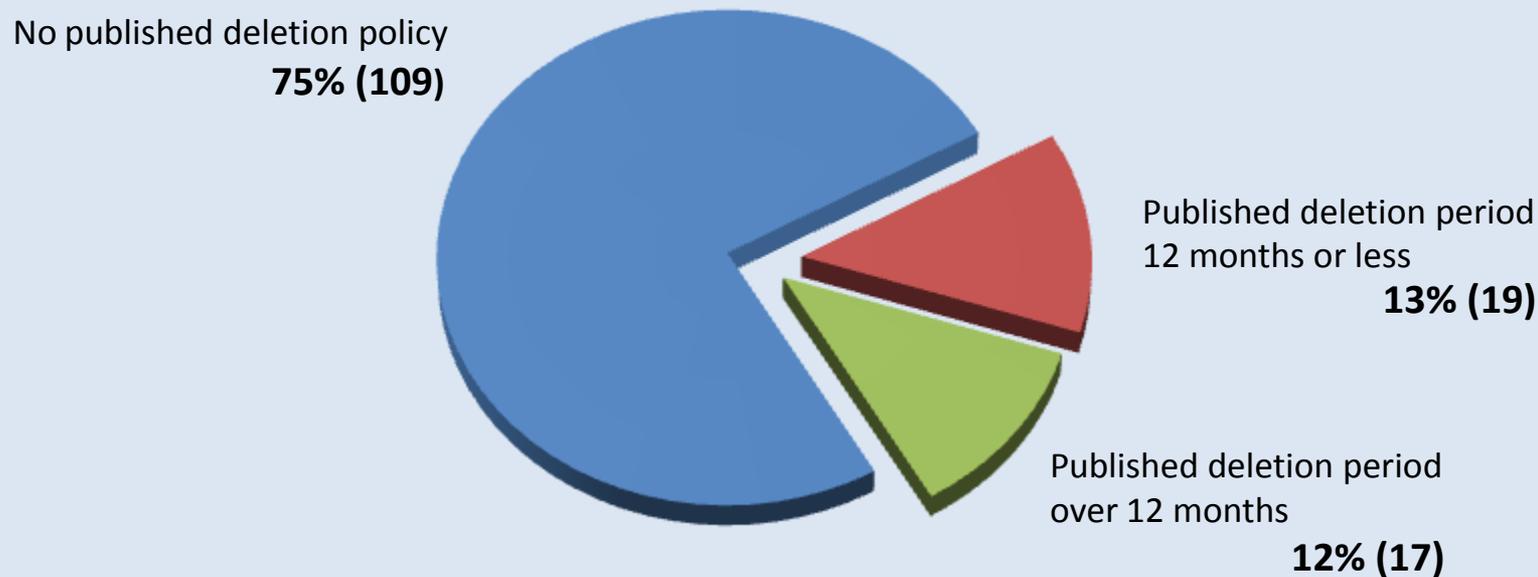
Relatively few ad networks promise to stay out of sensitive areas like financial and health



NAI members are assumed to be bound by NAI principles for sensitive categories, even if they have no express statement in their own policy.

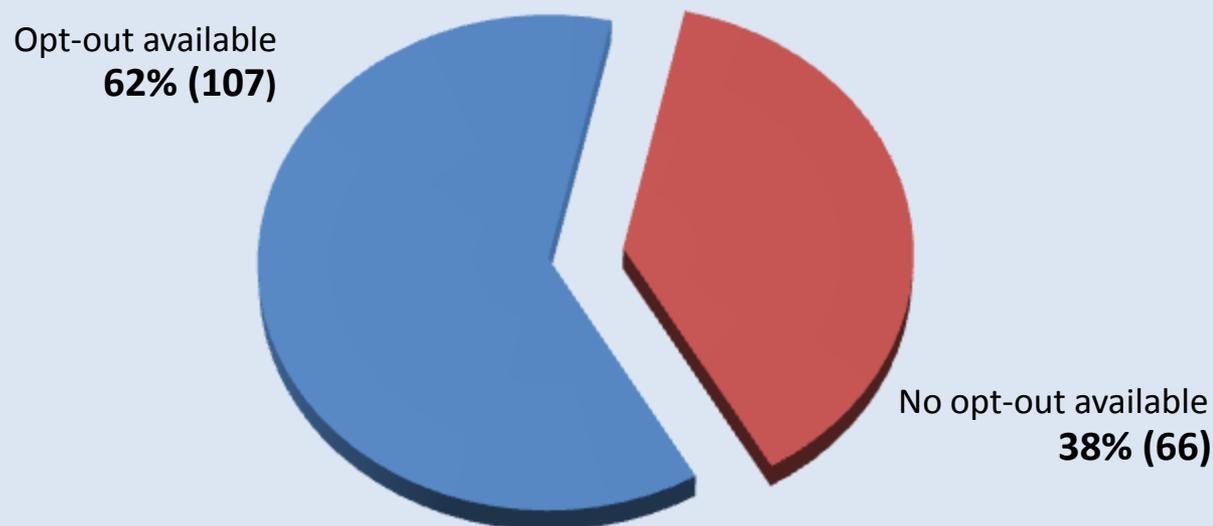
# Deletion

Relatively few ad-targeting companies tell you how long they keep the information they collect



# Opt-out availability

Over one-third of ad targeting companies offer no consumer opt-out



# Flash cookies

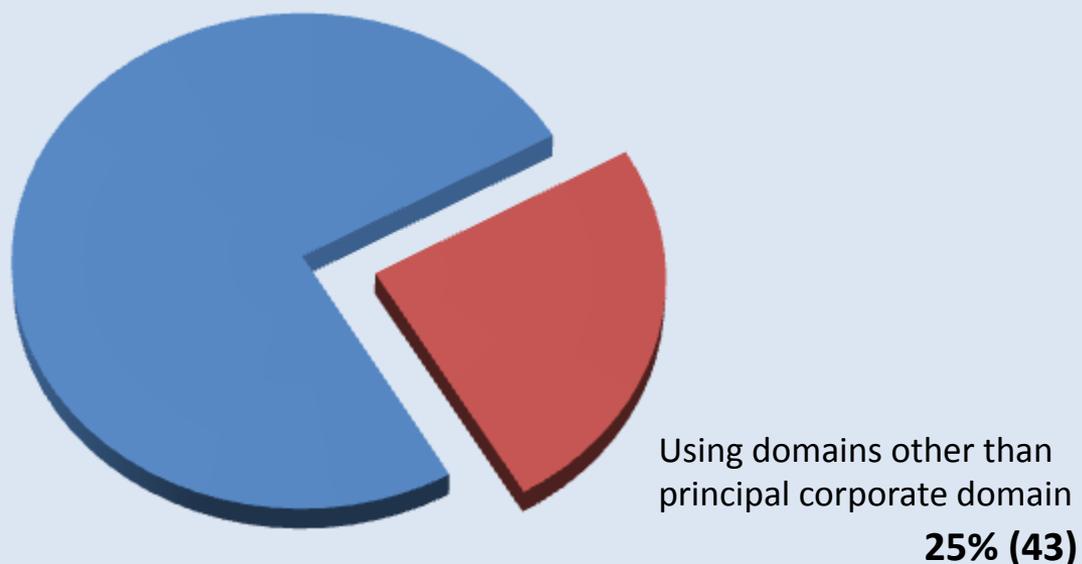
Some ad targeting companies use flash cookies



Based on Flash cookies found on 17 actual user computers.

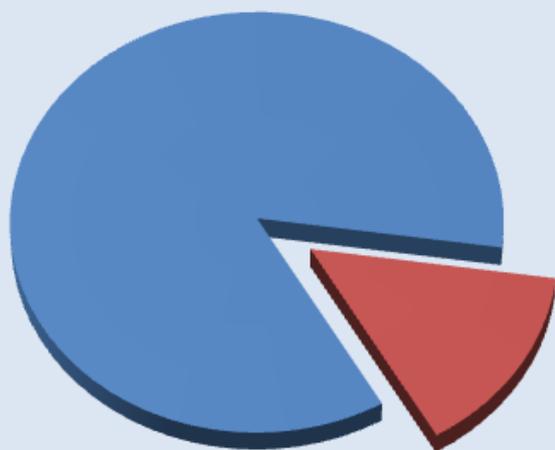
# Tracking domains

Many ad targeting companies use tracking domains that are different from their principal corporate domain

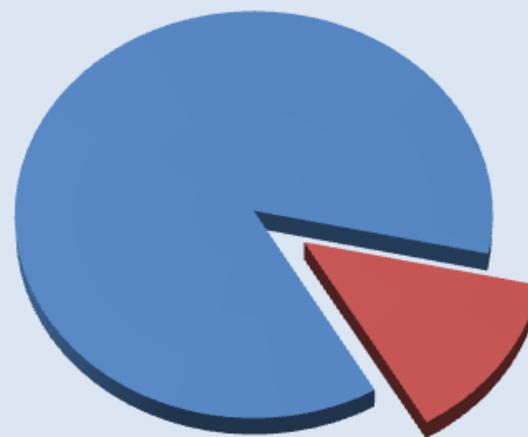


# Industry oversight

Less than one-fifth of all ad targeting companies are subject to oversight by the NAI or TRUSTe



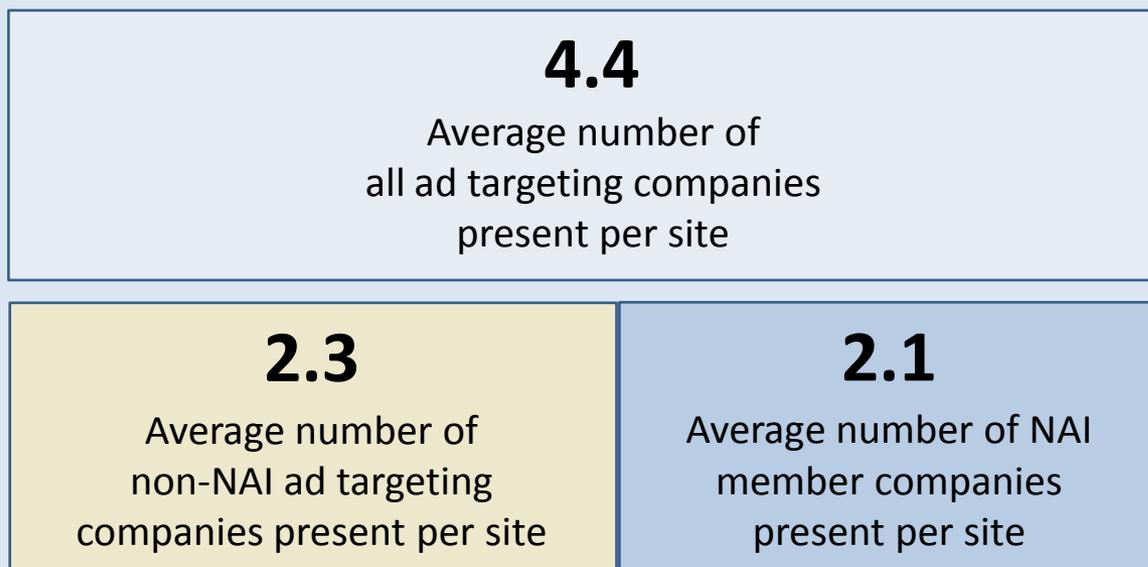
NAI members  
**14% (25)**



TRUSTe certified  
**13% (23)**

# NAI coverage

NAI-members represent a minority of all ad targeting companies present on top traffic websites



Based on pages sampled on ad-supported websites in the top 500 traffic networks (ranked by Quantcast.com)

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### **Conclusions and recommendations**

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# Disclosure requirements

**Privacy disclosures from most ad-targeting companies are substantially incomplete as to data retention and use of sensitive information.**

*Recommendation: All ad-targeting companies should provide minimum disclosures across key areas.*

**Missing and incomplete privacy policies and use of multiple tracking domains undermine transparency and accountability.**

*Recommendation: Ad targeting companies should specifically register the domains they use for tracking and the privacy policies applicable to those activities. This will enable industry and consumer groups to create more effective and complete tools to implement consumer preferences.*

# Technology requirements

**The wide reach of non-NAI member targeting companies limits the effectiveness of self-regulatory efforts.**

*Recommendation: Effective technology solutions for consumers must encompass all industry participants, whether or not NAI members. Disclosure and opt-out tools cannot assume voluntary compliance with best practices.*

**Technologies used to signify consumer choices (browser cookies) are less effective than technologies used to track behavior (Flash cookies).**

*Recommendation: Every ad-targeting company should provide an opt-out mechanism no less durable than those they use to track behavior. This principle can apply to Flash cookies as well as to future potential tracking methods, including technologies such as HTML5.*

# Website requirements

**Website publishers are not fully considering privacy impacts when they enable ad targeting on their websites.**

*Recommendation: Websites employing ad targeting should provide enhanced disclosure and choice at the webpage and website level. This supports greater accountability among websites and advertisers and provides the easiest and most complete user experience.*

*Separate disclosure directly within ads, while helpful, cannot alone provide an acceptable consumer experience. In-ad disclosure depends upon separate interactions for each ad, gives no single view of all relevant companies and opt-out choices, and does not easily provide visibility on multiple companies that may be involved in selection of a single advertisement or all advertisements on a page.*

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