

Guidance on consumer Internet of Things consultation

Overview

The Information Commissioner's Office (ICO) is consulting on [draft guidance on consumer Internet of Things products and services](https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/online-tracking/guidance-for-consumer-internet-of-things-products-and-services/) <<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/online-tracking/guidance-for-consumer-internet-of-things-products-and-services/>> and [draft impact assessment](https://ico.org.uk/about-the-ico/research-reports-impact-and-evaluation/impact-and-evaluation/impact-assessment/consumer-internet-of-things-draft-impact-assessment-June-2025/) <<https://ico.org.uk/about-the-ico/research-reports-impact-and-evaluation/impact-and-evaluation/impact-assessment/consumer-internet-of-things-draft-impact-assessment-June-2025/>> .

Your responses will help us to provide any additional clarity for the final guidance.

We welcome your feedback to the questions set out in this survey. They're split into the following sections:

- Section 1: About you and your organisation.
- Section 2: Your view on our proposed regulatory approach.
- Section 3: Your current practice.
- Section 4: Final comments.

The consultation will remain open until the end of **Sunday 7 September 2025**. We may not consider responses received after this deadline.

Privacy Statement

For this consultation, depending on your preference, we may publish in full the responses received from organisations or a summary of the responses. If we do publish any responses, we will remove email addresses and telephone numbers from these responses. Please do not to share any information in your response which you would not be happy for us to make publicly available.

Should we receive an FOI request for your response we will always seek to consult with you for your views on the disclosure of this information before any decision is made. For more information about what we do with personal data please see our [privacy notice](https://ico.org.uk/global/privacy-notice/) <<https://ico.org.uk/global/privacy-notice/>> , and the section on [responding to our consultations and surveys](https://ico.org.uk/global/privacy-notice/responding-to-our-consultation-requests-and-surveys/) <<https://ico.org.uk/global/privacy-notice/responding-to-our-consultation-requests-and-surveys/>> .

Please note that we are using the platform Citizen Space to gather this information on our behalf. Citizen Space is provided by a UK supplier, Delib. You can read Delib's privacy policy [here](https://www.delib.net/legal/privacy_notice) <https://www.delib.net/legal/privacy_notice> .

About you and your organisation

1 What is your name?

Name

2 What is your email address?

Email

3 What is your organisation?

Organisation

4 Are you a manufacturer or a service provider of consumer IoT products?

(Required)

Please select only one item

- ☐ Yes
- ☐ No
- ☐ Unsure/Don't know

5 What is the size of your organisation?

(Required)

Please select only one item

- ☐ 0 to 1 members of staff
- ☐ 2 to 9 members of staff
- ☐ 10 to 49 members of staff
- ☐ 50 to 249 members of staff
- ☐ 250 to 499 members of staff
- ☐ 500 to 999 members of staff
- ☐ More than 1,000 members of staff
- ☐ Unsure/Don't know

6 Approximately what percentage of your staff are based in the UK?

(Required)

Please select only one item

- ☐ 0%
- ☐ 1% - 20%
- ☐ 21% - 40%
- ☐ 41% - 60%
- ☐ 61% - 80%
- ☐ 81% - 100%
- ☐ Unsure/Don't know

7 Are you answering as:

(Required)

Please select only one item

- ☐ Private sector business
- ☐ Public sector organisation
- ☐ Representative of a professional industry or trade association
- ☐ University
- ☐ Organisation representing the interests of UK citizens
- ☐ Other

If you chose other, please specify

Your views on our proposed regulatory approach

The following questions are about our [draft guidance](https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/online-tracking/guidance-for-consumer-internet-of-things-products-and-services/) <<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/online-tracking/guidance-for-consumer-internet-of-things-products-and-services/>> .

8 How far do you agree that this draft guidance provides added clarity on our expectations for organisations providing consumer IoT products and services?

(Required)

Please select only one item

- ☐ Strongly agree
- ☐ Agree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ Unsure/Don't know

Please explain your answer

9 In the sections “what does this guidance cover” and “what doesn’t this guidance cover”, how far do you agree that the definition of consumer IoT products covers the majority of consumer IoT market?

(Required)

Please select only one item

- ☐ Strongly agree
- ☐ Agree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ Unsure/Don't know

Please provide details of any consumer IoT products we have missed or that require further consideration.

10 How far do you agree that this draft guidance provides added clarity on our expectations for the use of storage and access technologies for IoT products and application of PECR?

(Required)

Please select only one item

- ☐ Strongly agree
- ☐ Agree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ Unsure/Don't know

Please explain your answer

11 How helpful are the information and graphics in the “how do we ask for consent” section in providing clarity on this topic?

(Required)

Please select only one item

- ☐ Very helpful
- ☐ Somewhat helpful
- ☐ Somewhat unhelpful
- ☐ Not helpful at all
- ☐ Unsure/Don't know

Please explain your answer

12 How helpful are the information and graphics in the “how should we tell people what we’re doing” section in providing clarity on this topic?

(Required)

Please select only one item

- ☐ Very helpful
- ☐ Somewhat helpful
- ☐ Somewhat unhelpful
- ☐ Not helpful at all
- ☐ Unsure/Don't know

Please explain your answer

13 Are there IoT products with other types of interfaces for which the ICO should consider providing more clarity or graphics?

Please provide your answer

14 Are there any areas of this draft guidance where you think more graphics or diagrams would provide additional clarity?

Please provide your answer

15 How helpful is the guidance in providing clarity about data protection requirements for multiple users of the same IoT product?

(Required)

Please select only one item

- ☐ Very helpful
- ☐ Somewhat helpful
- ☐ Somewhat unhelpful
- ☐ Not helpful at all
- ☐ Unsure/Don't know

Please explain your answer

Current practice

16 What criteria do organisations use to identify their role as controller, processor and joint controller in the IoT ecosystem and how do they separate the different processing activities when assessing their role(s)? If you are responding as a manufacturer or an organisation working in the IoT sector, please reflect your own experience.

Please provide your answer

17 What types of controller, processor and joint controller scenarios would benefit from further clarification?

Please provide your answer

18 How do organisations exercise influence and control over the means and purposes of distinct processing activities related to consumer IoT products? If you are responding as a manufacturer or an organisation working in the IoT sector, please reflect your own experience.

Please provide your answer

19 What barriers do organisations face in seeking consent from users on IoT devices with different interfaces, for example small screens, large screens, voice and sound interfaces or mobile screens? If you are responding as a manufacturer or an organisation working in the IoT sector, please reflect your own experience.

Please provide your answer

20 What barriers do organisations face in seeking consent from users who are not the main user or the main account holder? If you are responding as a manufacturer or an organisation working in the IoT sector, please reflect your own experience.

Please provide your answer

21 What are the barriers to organisations providing easily understandable and accessible privacy information for consumer IoT products? Please outline any particular challenges with different interfaces, for example small screens, large screens, voice and sound interfaces or mobile screens.

Please provide your answer

22 What barriers do organisations face in providing privacy information to users who are not the main user or the main account holder? If you are responding as a manufacturer or an organisation working in the IoT sector, please reflect your own experience.

Please provide your answer

23 As defined in the section “how do we help people exercise their rights”, how do organisations currently implement individual rights in IoT products? If you are responding as a manufacturer or an organisation working in the IoT sector, please reflect your own experience.

Please provide your answer

24 What barriers do organisations face in implementing individual rights for multiple users? If you are responding as a manufacturer or an organisation working in the IoT sector, please reflect your own experience.

Please provide your answer

Questions to assess the impact of our approach

As part of our impact assessment work, we would like to understand more about how you think this guidance impacts you and your organisation. The following questions are about our [draft impact assessment](https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fico.org.uk%2Fabout-the-ico%2Fresearch-reports-impact-and-evaluation%2Fimpact-and-evaluation%2Fimpact-assessment%2Fconsumer-internet-of-things-draft-impact-assessment-June-2025%2F&data=05%7C02%7CSlavka.Bielikova%40ico.org.uk%7C33cea8f1e7cf40d9e7e908dda8335a85%7C501293238fab4000adc1c4cfefba21e6%7C0%7C0%7C6388) <<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fico.org.uk%2Fabout-the-ico%2Fresearch-reports-impact-and-evaluation%2Fimpact-and-evaluation%2Fimpact-assessment%2Fconsumer-internet-of-things-draft-impact-assessment-June-2025%2F&data=05%7C02%7CSlavka.Bielikova%40ico.org.uk%7C33cea8f1e7cf40d9e7e908dda8335a85%7C501293238fab4000adc1c4cfefba21e6%7C0%7C0%7C6388>

25 Do you agree that the draft impact assessment adequately covers the main affected groups?

(Required)

Please select only one item

- ☐ Yes
- ☐ No
- ☐ Unsure/Don't know

Please provide details of any affected groups we have missed or that require further consideration.

Please provide additional evidence on the likely scale of the affected groups

26 Do you agree that the draft impact assessment adequately outlines the main impacts?

(Required)

Please select only one item

- ☐ Strongly agree
- ☐ Agree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ Unsure/Don't know

Please provide details of any impacts we have missed or that require further consideration.

27 If there is any other evidence or information on the potential impacts of the guidance or our impact assessment that you would like us to consider, please provide it in the box below. (This could include a description, links to other sources, or contact details where we can reach you to discuss further)

Evidence of any other potential impacts

28 Do you think the draft guidance for consumer IoT products and services would result in additional costs or benefits to your organisation? (These could be financial or non-financial and might include staff time.)

(Required)

Please select only one item

- ☐ Cost
- ☐ Benefits
- ☐ Both
- ☐ Neither
- ☐ Unsure/Don't know

Please describe the types of additional costs or benefits you might incur.

Please provide a rough estimate of the costs or benefits you are likely to incur and briefly explain how you have calculated these.

Final comments

29 Before completing this consultation, do you have any final comments you have not made elsewhere?

Please provide your answer

30 The ICO would like your permission to publish your consultation response. Please indicate your publishing preference:

(Required)

Please select only one item

- ☐ Publish response
- ☐ Publish response anonymously (this will remove all personal data, such as name)
- ☐ Do not publish response