

Our approach to regulating online advertising - Call for views

Overview

The Information Commissioner's Office (ICO) is calling for views on our approach to regulating online advertising.

Please ensure you've read our call for views and online tracking strategy update before responding.

Your responses will help us to develop our views.

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

- Section 1: Advertising purposes and capabilities
- Section 2: Impacts of our approach
- Section 3: Technical safeguards
- Section 4: About you and your organisation

The consultation will remain open until the end of **29 August 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> .

Advertising purposes and capabilities

We are seeking your views on the minimum requirements for commercially viable online advertising models. This will support us in identifying whether there are circumstances in which storage and access of information for certain advertising purposes can pose a low risk to user privacy.

1 Ad delivery and billing

What features within ad delivery and billing are the minimum requirements for a commercially viable advertising model, and why?

2 Ad fraud prevention and detection

What features within ad fraud prevention and detection are the minimum requirements for a commercially viable advertising model, and why?

3 Brand safety, brand suitability and brand compliance

What features within brand safety, brand suitability and brand compliance are the minimum requirements for a commercially viable advertising model, and why?

4 Frequency capping

What features within frequency capping are the minimum requirements for a commercially viable advertising model, and why?

5 Measurement and attribution

What features within measurement and attribution are the minimum requirements for a commercially viable advertising model, and why?

6 Targeting

For example, how an ad is targeted towards a user or a group of users.

What features within targeting are the minimum requirements for a commercially viable advertising model, and why?

7 How significant are the changes in ICO regulatory posture towards PECR regulation 6 consent requirements that would be required to enable delivery of a commercially viable advertising model?

	Significant change	Some change	No change	Unsure/Don't know
Ad delivery and billing <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ad fraud prevention and detection <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Brand safety, brand suitability and brand compliance <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Frequency capping <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measurement and attribution <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Targeting <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer:

Impacts of our approach

8 How far do you agree that the approach outlined in our call for views can identify commercially viable solutions that can also safeguard people's privacy and improve user experience?

(Required)

Please select only one item

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

Please explain your answer:

9 Would you anticipate any of the following positive impacts if any of the capabilities referenced were permitted without PECR consent in circumstances where the ICO considers them to be low risk to people? Please select all that apply:

Please select all that apply

- ☐ Improved business confidence
- ☐ Improved customer experience
- ☐ Improved certainty on compliant methods of processing of personal data
- ☐ Increased revenue from compliant digital advertising
- ☐ Changes to existing processes
- ☐ Innovative new products
- ☐ Other (please specify)

If other, please specify:

Please provide any evidence on the likely scale of these positive impacts:

10 Would you anticipate any of the following negative impacts if any of the capabilities referenced were permitted without PECR consent in circumstances where the ICO considers them to be low risk to people? Please select all that apply:

Please select all that apply

- ☐ Familiarisation costs of understanding new capabilities
- ☐ Increased costs of system updates
- ☐ Worsened customer experience
- ☐ Increased risk of privacy harm
- ☐ Other (please specify)

If other, please specify:

Please provide any evidence on the likely scale of these negative impacts:

11 Do you see any challenges in delivering commercially viable advertising if the ICO were to revise its regulatory posture towards regulation 6 PECR requirements for specific advertising purposes?

(Required)

Please select only one item

- ☐ Yes
- ☐ No
- ☐ Unsure / Don't know

Please explain your answer:

Technical safeguards

12 Are you aware of any technical safeguards to reduce data protection and privacy risks of storage and access of information for the advertising purposes listed above?

For example, could the use of **Privacy Enhancing Technologies** <<http://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/data-sharing/privacy-enhancing-technologies/>> (PETs) help?

Please provide your answer:

13 Do you currently use any technical safeguards or PETs in your online advertising model?

Please provide your answer:

14 Are you aware of any recent innovations which significantly reduce the data protection and privacy risks of one or more of the capabilities?

Please provide your answer:

About you and your organisation

15 Are you responding on behalf of an organisation?*(Required)**Please select only one item*

- ☐ A private sector organisation
- ☐ A public sector organisation
- ☐ A charity or third sector organisation
- ☐ I'm not responding on behalf of an organisation
- ☐ Other (please specify)

If other please specify:

16 If you are not responding on behalf of an organisation, are you answering as:*Please select only one item*

- ☐ An individual in a private capacity
- ☐ A journalist
- ☐ A member of the legal profession, including legal consultant
- ☐ A data protection consultant
- ☐ An academic
- ☐ An individual in other professional capacity (eg someone providing their view as a member of the public)
- ☐ Other (please specify)

If other, please specify:

About you and your organisation**17 Is your organisation:***(Required)**Please select only one item*

- ☐ A business
- ☐ An organisation representing the interests of UK citizens
- ☐ A representative of a professional, industry or trade association
- ☐ A university
- ☐ Other (please specify)

If other, please specify:

18 What is the size of your organisation?*(Required)**Please select only one item*

- ☐ Zero employees / Sole trader
- ☐ 2 to 9 members of staff
- ☐ 10 to 249 members of staff
- ☐ 250 to 499 members of staff
- ☐ 500 to 999 members of staff
- ☐ 1,000 to 2,499 members of staff
- ☐ More than 2,500 members of staff
- ☐ Unsure / Don't know

19 What is the name of your organisation?**20 Which of these categories best describes your organisation's (or organisations you represent) activities?***(Required)**Please select only one item*

- ☐ Brand
- ☐ Media agency
- ☐ Adtech supply chain
- ☐ Publisher
- ☐ Other (please specify)

If other, please specify:

If you are a trade association please indicate below:

Please select only one item

- ☐ Trade association

Final comments**21 Before completing this call for views, do you have any final comments you have not made elsewhere?**

Please provide your comments:

- 22** We may wish to contact you for further information on your responses. If you are happy to be contacted, please provide your name and an email address below.

Please provide your name

Please provide your email address

- 23** We may publish in full the responses received from organisations or a summary of the responses. If so, we 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
- ☐ Do not publish response