





ABOUT THE ISA

- The Indian Society of Advertisers (ISA) is **the peak body representing advertisers across India for 70+ years.**
- ISA is one of the **founders of** Advertising Standards Council of India (ASCI).
- ISA is one of the three constituent bodies that **formed Broadcast Audience Research Council (BARC)**, a pioneer body in TV audience measurement.
- ISA is also one of the **founding members of the World Federation of Advertisers (WFA)** that operates from Brussels.
- ISA's **mission** is to **safeguard the interest of advertisers by promoting efficient and effective Advertising Practices**

We are the Indian Society of advertisers





Sunil Kataria

Chairman, ISA
CEO, Raymond
Lifestyle



Tejas Apte

ISA Media Forum
Chairperson,
General Manager-
Media & DMC, South
Asia, Hindustan
Unilever



Ankit Desai

ISA Media Forum
Co-Chairperson,
Media, Digital Marketing,
and Brand PR Head (India
and Global Centre of
Excellence), Marico

Foreword

As the Indian advertising landscape continues to evolve, the need for a robust and transparent framework has never been more critical. The Indian Society of Advertisers (ISA) has been at the forefront of these developments, committed to fostering a media ecosystem that prioritizes transparency, efficiency, and the highest standards of practice.

We are proud to present the culmination of our efforts in the form of the ISA Media Charter Playbooks. These playbooks—focused on Brand Safety, Ad-Fraud, Viewability, and First-Party Data—represent the collective expertise, insights, and commitment of industry leaders and stakeholders. The creation of these playbooks has been a meticulous process, driven by our shared vision to safeguard the interests of brands, consumers, and the broader advertising community.

In an era where digital advancements and the proliferation of media channels present both opportunities and challenges, these playbooks offer a comprehensive guide to navigating this complex environment. They serve as a testament to our dedication to upholding the highest standards in advertising. We extend our deepest gratitude to everyone involved in the development of these playbooks—our members, partners, and industry experts—whose contributions have been invaluable.

We believe that these resources will empower advertisers to make informed decisions, enhance the effectiveness of their campaigns. With the launch of these playbooks, we reaffirm our commitment to safeguarding the interest of advertisers by promoting efficient and effective Advertising Practices.



Legal Advisory

The use of brand names, vendor names and/or company names in the ISA Media Charter (IMC) playbooks and/or any mention or listing of specific commercial products or services in these playbooks is solely for educational purposes and does not imply endorsement by the ISA, nor discrimination against comparable brands, products or services available in the market. ISA does not endorse or recommend any vendor/company and references to any vendor/company in the IMC playbooks are incidental and have been used with the consent of such vendor/company for illustrative purposes. ISA members are not obligated to follow the recommendations outlined in the IMC playbooks. Each member should independently evaluate which suggestions, brands, vendor or company is best suited to their specific business needs, policies, and values. The action plans presented in the IMC are intended as recommendatory and optional guidelines. While the IMC playbooks address various challenges within the digital advertising ecosystem and propose potential solutions for improved efficiency and effectiveness, members are encouraged to consult their legal counsel if necessary before implementing any suggestions. ISA makes no representations or warranties regarding the content or outcomes of the IMC playbooks



FIRST-PARTY DATA PLAYBOOK



ISA First Party Data Sub-Committee



Priyanka K Gandhi
Integrated Brand
Experience & Media
specialist, **ISA 1P**
Subcommittee Head



Arvind R P
CMO,
McDonald's



Chintan Soni
CEO/Cofounder
mFunnel.ai (Unit of
Madison World)



Gautam Surath
COO, Performics



Gazal Bajaj
Media Head,
Nestlé



Karan Anand
SVP, IPG



Sairam Ranganathan
CDO, Wavemaker



Shamik Guha
Media & E-com.
Head, Abbott



Shashi Udyavar
Industry Head
(CPG), Meta



Shreya Godani
Media Measurement
& Marketing Head, ISA



Taranjeet Kaur
VP, Tata Consumer



Varman M
Media Head, Zydus



VISION

This playbook serves as a definitive guide to unlocking the potential of first-party data, covering everything from setup and fundamentals to strategic implementation for impactful results.

It offers strategic, process, and technological insights to optimize first-party data and enhance data-driven marketing, including a detailed 2023 industry overview.

The playbook categorizes organizations as 'Mature' or 'Developing' based on their self-assessment responses from a global survey conducted among WFA Media and Marketing Communities members in 2023. 'Mature' organizations have reported being 'already there' or 'well on the way,' while 'Developing' organizations are those that have 'just started' or 'haven't started'. The data charts primarily derive from this survey, providing a clear view of current practices and trends.

CONTENTS

1 What Is First-party data? How is it different from Second-party & Third-party data?

2 Evolution of First-party Data and its importance to Businesses

3 How should you build a First-party program?

- Acquisition
- Segmentation & Enrichment of Data
- Activation

4 Evolution of Data-Driven Marketing Tools and Techniques

5 Legal compliances to be observed for Data Privacy and Data Management.

6 Industry Actions Required

7 Glossary

A current overview of progress in the organizational Data Journey

Data is seen as a critical enabler of growth, but not all are clear how to use it

98% of organisations have or are developing their capabilities

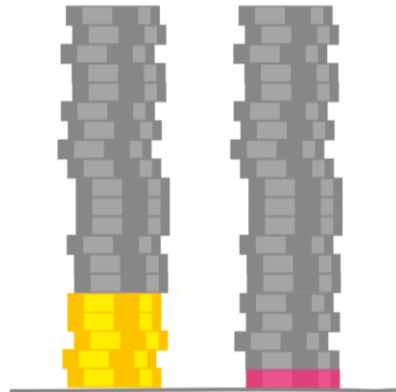
57%

of respondents are 'well on the way' with data driven marketing program, albeit only 2% are world-class

Just **35% of Mature** and **11% of Developing** organisations have 'fully' defined how they will use the consumer data collected

Confidence in the ROI from data driven marketing is still low

Only **27% of mature** and **6% of developing** organisations are 'very confident in their ability to quantify ROI'



Some topics proving tougher to overcome even for the most mature organisations

- 1 Accessing the right consumer data
- 2 Measuring the impact/ROI
- 3 Creating a fit for purpose technology stack

are identified as the most prominent challenges where focus is required

However, organisations are successfully resolving issues around 'data protection/privacy/legislation'



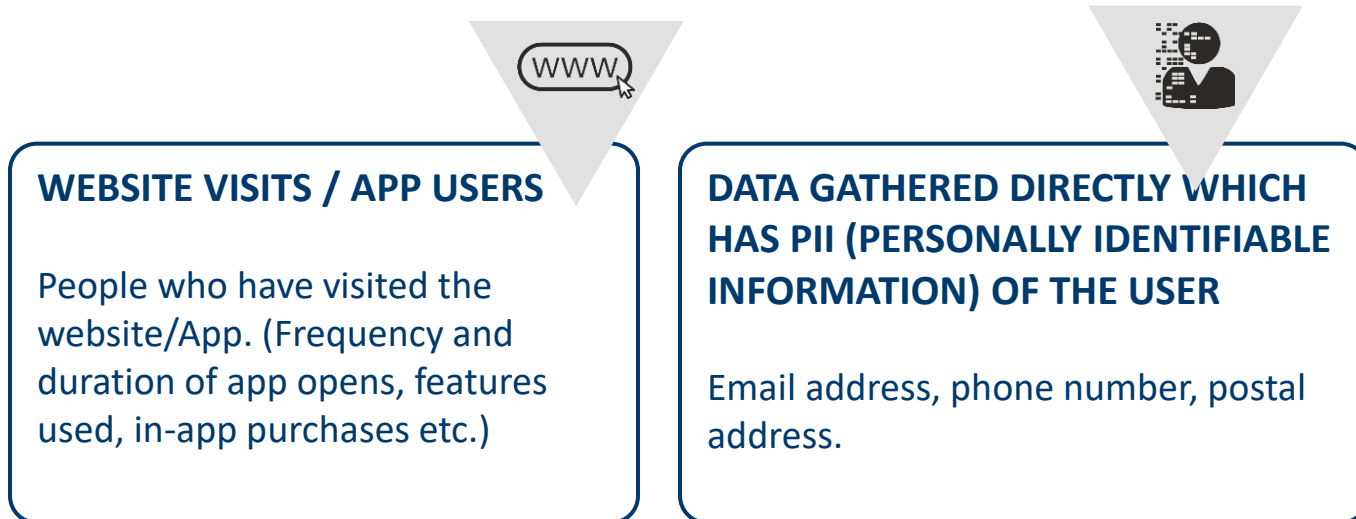
SECTION 1

What is First-party data?
How is it different from
Second-party and
Third-party data?

What is First-party (1P) data?

First-party data is data **collected and owned directly by a company**.

1PD is information you collect directly from your customers and audience, like when they interact with your website, app, products, events or marketing campaigns.



What is Second-party (2P) data?

Second-party data refers to **another company's first-party data that is shared directly between the two parties for mutual benefit**. This exchange, typically governed by a data-sharing agreement, allows both parties to benefit by leveraging each other's data to enhance targeting, personalization, and insights. Unlike 1P data, second-party data is not gathered firsthand but acquired from another organization/platforms, etc.



COLLABORATIVE PARTNERSHIPS

Two companies in a strategic partnership may share relevant data to enhance their marketing efforts, such as a manufacturer and a retailer collaborating on customer insights.



JOINT VENTURES

Businesses involved in joint ventures often share data to optimize their collective marketing strategies, such as in the case of co-branded products.



DATA EXCHANGES

Platforms or marketplaces where companies willingly share their first-party data with specific partners for targeted advertising or analytics.



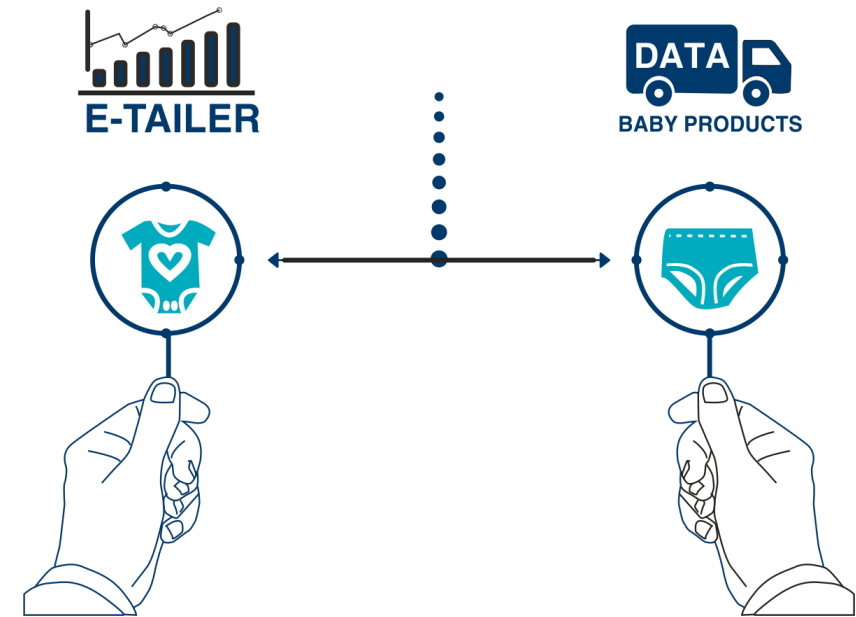
DIRECT PURCHASES

In some cases, companies may directly purchase another company's first-party data, making it second-party data for the buyer.

Example

If any brand operating in the category of infant / child care does a tie-up with Largest Online Store for newborn, baby & kids products and runs the marketing campaign on their dataset.

The key characteristic is that the **data is shared in a mutually agreed-upon and transparent manner between the two parties for a specific purpose, often leading to more precise targeting and personalized marketing strategies.**



What is Third-party (3P) data?

Third-party data (3P data) is information collected by an entity that does not have a direct relationship with the individuals the data pertains to. This data is typically acquired from various external sources, and companies may purchase or license it to supplement their own first-party data for marketing, analytics, and targeting purposes.



OPEN WEB

Data collected by large DSPs from open web also falls under 3rd party data.

Example: Could be interest targeting, affinity targeting. Google has an audience cohort called beauty mavens which is based on browsing/search behavior, similar audience cohorts/interests are available in meta, open web.



DATA AGGREGATORS

Companies that collect & aggregate data from various sources to create comprehensive datasets.

For instance, demographic information, purchasing behavior, or interests collected from multiple providers viz. Lotame, PayU



LOCATION DATA PROVIDERS

Companies that collect and sell data related to the location and movement patterns of individuals. This information is valuable for location-based targeting in advertising.

Example: Life sight



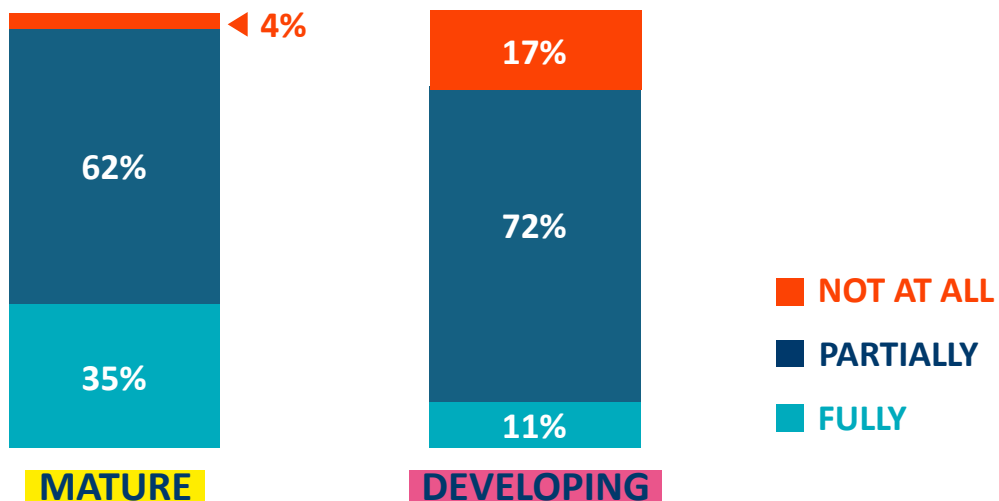
SECTION 2

Evolution of First-party data & its importance to Businesses

Why collect Consumer data?

Collecting data without a clear reason creates a cost without a return and leaves organizations open to regulatory scrutiny. However, too many organizations are pursuing data collection (the 'What' and the 'Where') and processing (the 'How') without a clear goal (the 'Why').

THE WHY: To what extent do you have a data strategy which describes the end goal for consumer data collected?



Organizations who have answered 'fully' to the '**Why**', '**What**', '**How**', and '**Where**' have now got the basics right, so should be well set to realize the gains possible. However, this is **less than 10% of the total market**.

Things to consider

- ◀ Align as a project team the Why, before addressing any of the other topics in the discipline.
- ◀ Secure agreement at a senior level before proceeding.
- ◀ Be open to revising strategies once underway. The market is evolving rapidly and changes may be necessary and desirable.



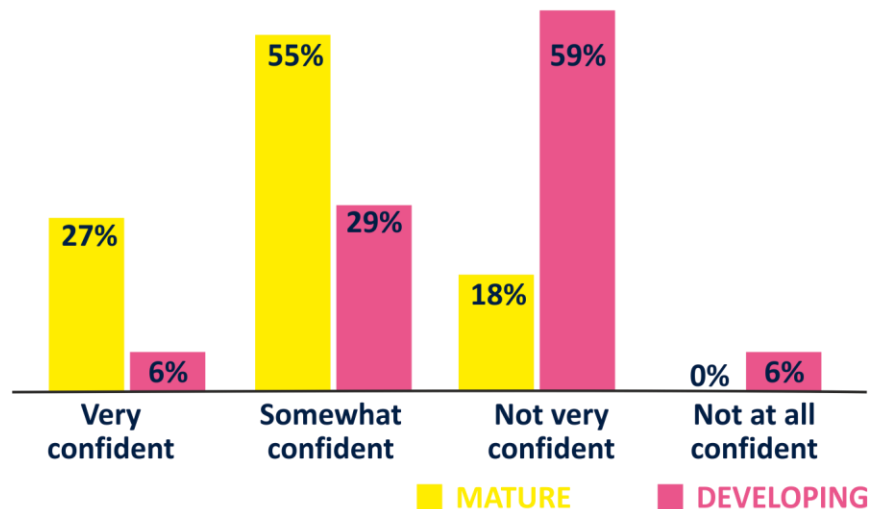
Why is the **First-party** gaining importance?

- ◀ **Increased Privacy Concerns:** Growing concerns over privacy are driving significant changes in audience targeting. Users now have more control over their data, leading to a shift away from third-party tracking.
- ◀ **Enhanced Privacy Options:** Major platforms—like iOS's opt-out options, Chrome's new user controls, and Android's strengthened ad personalization opt out policies—are reshaping how advertisers can use third-party data. As a result, first-party data is now strategically crucial as it enables advertisers to directly gather and utilize data from their own channels without relying on third-party cookies or tracking.
- ◀ **Ad Blockers and Opt-Outs:** The increasing use of ad blockers and opt-out features in apps and browsers limits the effectiveness of campaigns that rely on third-party data, further emphasizing the value of first-party data in targeting and personalizing ads effectively.



Global Statistics

How Confident are you with quantifying the ROI from your data driven marketing activity?



Things to consider

- ◀ As you consider the type of data to collect, **assess what you will be using the data for.**
- ◀ When you know what you will be using data for, **consider the skillset required for analysis.** This field has become ever more specialized so it may be preferable to contact external providers.
- ◀ Building confidence in ROI is vital to keep the organization engaged with the process. All work streams should ultimately be helping to build this metric.

Importance of 1P to business

-

1. Enhancing Consumer Experience

IMPROVE CONSUMER EXPERIENCE, JOURNEY

Business can tailor interaction based on consumer preference and behaviour to make the content more relevant to individual consumer, leading to higher engagement and connect.

Example:

An e-Commerce site can use past purchase history to recommend related products, enhancing the customers shopping journey.

CREATIVE, TARGETING AND LANDING PAGE PERSONALIZATION

Consumers can be categorized into segments, enabling brands to deliver customized content to deliver better ROI.

Example:

An online fashion retailer uses first-party data to identify existing buying audiences of Formalwear. They are shown a communication/creative - which talks about the new fashion in formal office wear. Once they click and land on the landing page, there is new collection of formal wear, there by driving personalization across the entire consumer journey. Similarly, multiple segments, would be identified for targeting, creative and landing page personalization.

2. Consumer Insights

DEEPER UNDERSTANDING OF CONSUMERS

1PD provides direct insights into consumer behavior, allowing business to understand their needs and build products/content accordingly.

Example:

A fitness app uses data to analyze the consumer workout preference, enabling the app to suggest personalized exercise routines.

MORE TRUSTABLE INSIGHTS

Data collected directly from consumers are more reliable and accurate than third party data, fostering trust in the insights delivered from it.

Example:

Customer survey conducted from the acquired data provides trust worthy insights.

3. Product Innovation

Insights on consumer feedback and usage patterns help in developing and innovating products that resonate with the consumer's expectations.

Example: A company identifies the increased need of natural health drink options among a certain cohort. In response, the company can innovate a low-sugar and natural ingredient-based health drink preferred by the consumers.



4. Lever to Deliver Higher ROI

CROSS-SELL/UP-SELL OPPORTUNITIES

First-party data helps identify opportunities to recommend additional products or upgrades based on the customers past purchase behavior.

Example:

An online electronics retailer suggests accessories or warranty plan to maximize cross sell.



INCREASED ROI

First party data helps in improving conversion rates, customer lifetime value, reduce customer acquisition cost, higher average transaction cost, higher media effectiveness

Example:

- ◀ Targeted advertising and personalized marketing helps optimize ad spends, leading to a more efficient customer acquisition
- Lookalike audiences created using 1PD have shown better response to online ads leading to improvement in media metrics like CPL, CTR etc.

First-party can play a transformative role across industries, influencing the way businesses operate and connect with their consumers.

Some 'use cases' across industries



PERSONALISED SHOPPING EXPERIENCE

Businesses leverage 1PD to create personalized shopping experiences. This includes tailored products, different pricing/promotion, customized journey depending on the consumers need.



PATIENT CARE AND ENGAGEMENT

Healthcare sector uses 1PD to improve patient care and engagement. Electronic health records, patient surveys, and feedback contribute to a comprehensive understanding of individual health needs, allowing for personalized treatment plans and effective communication.



RISK ASSESSMENT & PERSONALIZATION

In financial sector, 1PD aids in risk assessment for lending and financial planning. Also enables personalized financial advice and services based on individual spending patterns and financial goals.

First-party can play a transformative role across industries, influencing the way businesses operate and connect with their consumers.

Some 'use cases' across industries



CUSTOMER RETENTION & SERVICE OPTIMIZATION

Telecommunications companies use 1PD to improve customer retention by understanding usage patterns, preferences, and customer feedback.



CUSTOMER PREFERENCE & MARKETING

1PD helps manufacturers and dealerships understand customer preferences for vehicle features and options. It also supports targeted marketing efforts, including personalized promotions and advertisements.



CONSUMER UNDERSTANDING & PERSONALIZATION

In FMCG, 1PD drives targeted marketing and loyalty programs, leveraging insights into consumer preferences for personalized promotions and repeat purchases.



TRAVEL EXPERIENCE

Using 1PD, travel industry customized travel recommendations, loyalty programs, and targeted offers for accommodations, flights, and activities.

First-party can play a transformative role across industries, influencing the way businesses operate and connect with their consumers.

Some 'use cases' across industries



MENU PERSONALISATION & LOYALTY PROGRAM

Restaurants and food services use 1PD for menu personalization and loyalty programs. Understanding customer preferences enables targeted promotions, personalized menus, and rewards that enhance customer loyalty.



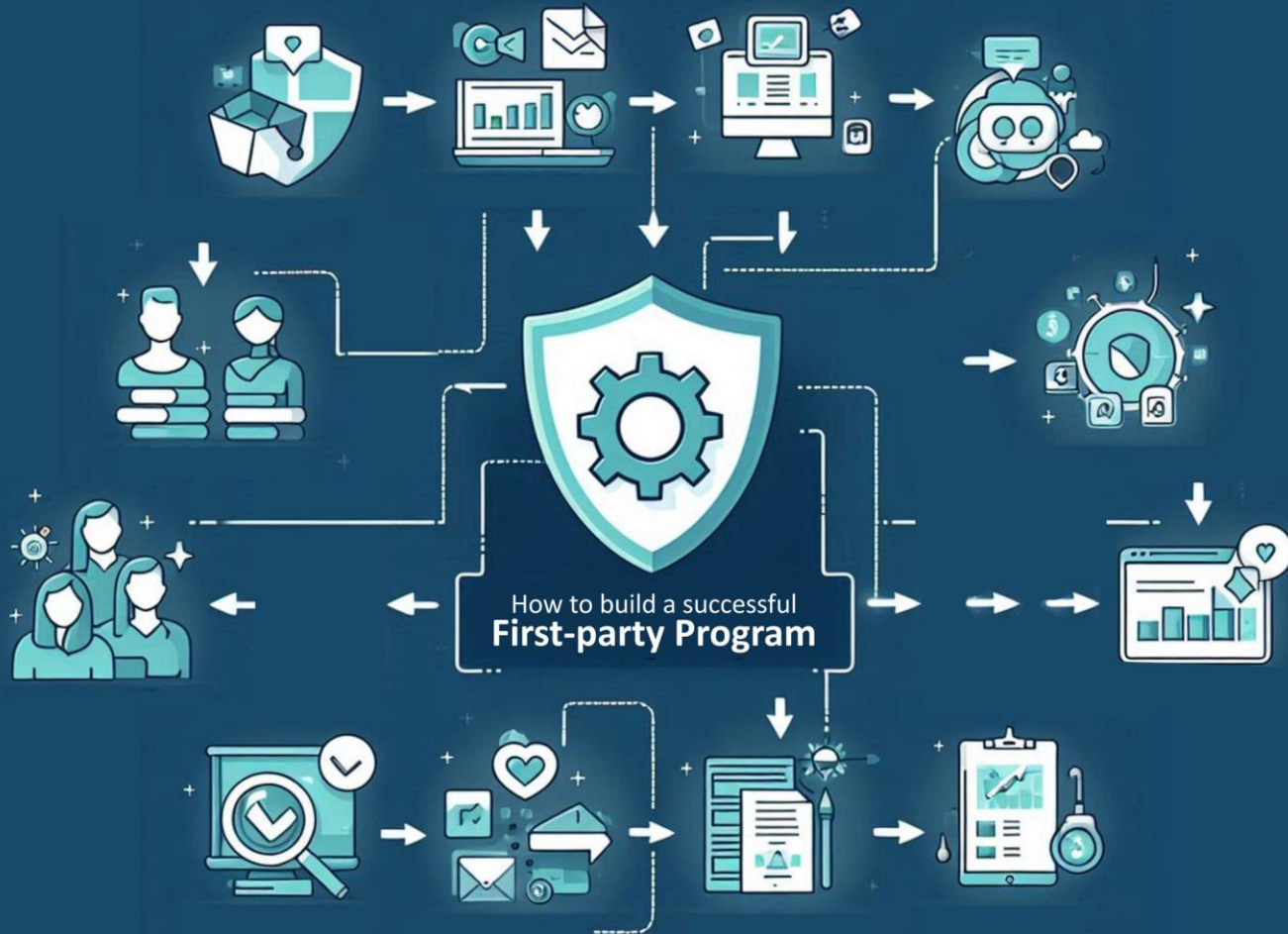
CUSTOMER PREFERENCE FOR PROPERTY

In real estate, 1PD data assists in understanding customer preference for property features location and price range. This information aids in targeted property recommendations and personalized marketing efforts.



CONTENT PERSONALISATION

1PD leveraged from content personalization. Streaming services. For example, user viewing history and preference to recommend relevant content, enhance



SECTION 3

How should you
build a First-party
program?

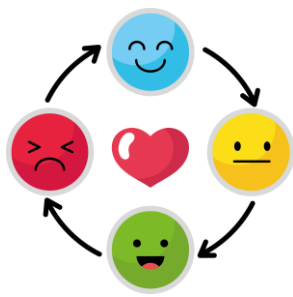
Value exchange

Value exchange is important for both stakeholders—businesses and consumers. When consumers willingly share their PII* in exchange for something valuable from the business—such as offers, exclusivity, personalization, or a greater purpose—it leads to an increase in trust in the brand/business in the First Party Data journey.

Value exchange framework needs to have one/many of these elements.



FUNCTIONAL



EMOTIONAL



PURPOSE

*PII - Personally Identifiable Information

1. Functional

Makes consumer's life convenient – saves time / money.

This could also be a contest / sweepstakes, that enables the consumer to win a prize/discount/experience.

Example : A brand in exchange for signup, gives you a Digestive quotient test, a promo.



1 in 2 people
sleep for less than 8 hours*

Inadequate sleep could lead to
digestive troubles!

 **Take the Digestive Quotient Test**

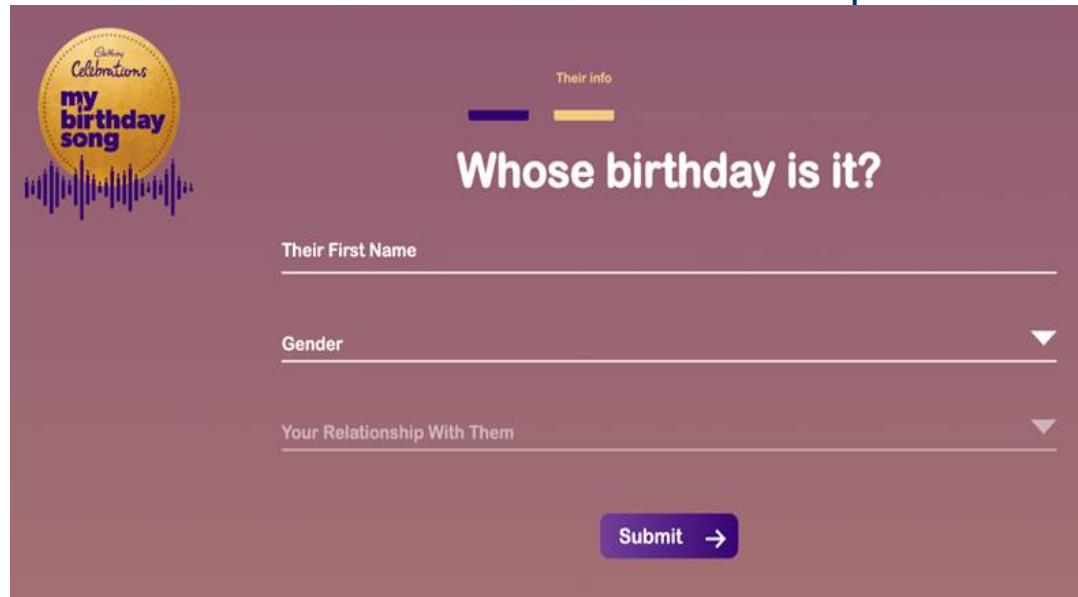
*Information based on 6L+ DQ Tests

The advertisement features a woman on the right side, wearing a white t-shirt and yawning with her hand covering her mouth. The background is a solid light orange color. The text is in a dark red font, with the main headline in a larger, bold font. A red arrow icon points to the call-to-action button.

2. Emotional

Makes the consumer's life enjoyable - creates emotions.

Example: A brand in exchange for your mobile number, helps you personalize, and create a happy birthday song that you can share with your friends, family and loved ones.

The image shows a mobile app interface for creating a birthday song. On the left is a circular logo with a gold border, containing the text 'Celebrations' in a script font, 'my birthday song' in a bold sans-serif font, and a purple audio waveform below. The main area has a dark purple background. At the top right, it says 'Their info' above a progress bar with three segments, the second of which is yellow. Below this is the title 'Whose birthday is it?' in white. There are three input fields: 'Their First Name' with a text input line, 'Gender' with a dropdown arrow, and 'Your Relationship With Them' with a dropdown arrow. At the bottom right is a purple button with the text 'Submit' and a right-pointing arrow.

3. Purpose

Makes the consumer's life meaningful - leading to joy / satisfaction.

Example: A brand, in its pack, gives you an experience where you can contribute to empower women by sharing your free mobile internet pack by scanning the QR code.

Post availing the Free data, there was content around how to learn life skills, which can help the audience become financially independent



Brands / businesses need to ask themselves the following in the context of value exchange

What's in this for consumers?

How to ensure that value exchanges are more meaningful and long term in nature?

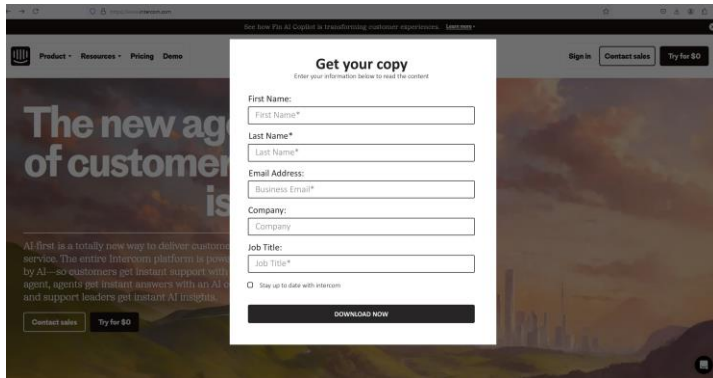
How to classify the consumer data basis value exchange into low, medium, and high for engagement?

Most importantly, what's the cost vs. benefit analysis of the value exchange offered, as the value exchange cost needs to be part of the cost/1PD acquisition cost?

How do you collect 1P data?

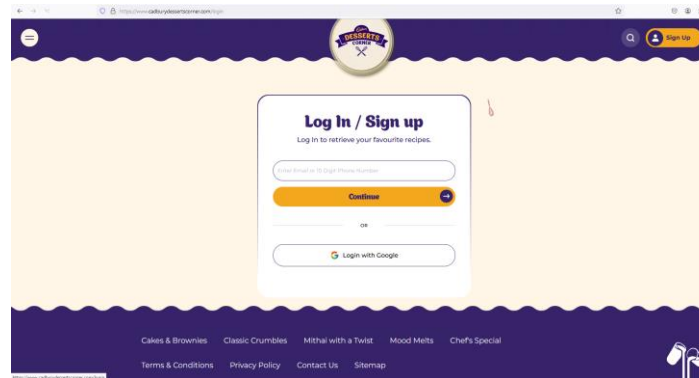
There are multiple sources of how first party data can be procured. These include online channels as well as offline ways:

ONLINE



The screenshot shows a landing page for 'AIfirst'. A white pop-up form titled 'Get your copy' is centered on the screen. The form contains the following fields: 'First Name*', 'Last Name*', 'Email Address:' (with a sub-field for 'Business Email*'), 'Company:', and 'Job Title:'. Below these fields is a checkbox labeled 'Stay up to date with intelcom.' and a 'DOWNLOAD NOW' button. The background of the landing page is dark with a cityscape image and text about AI-first customer service.

OWNED CHANNELS: WEBSITES, APP
Example: via Landing Page or Pop-ups



The screenshot shows a website for 'Bakery' with a purple header and footer. A white 'Log In / Sign up' form is centered on the page. The form has a title 'Log In / Sign up' and a subtitle 'Log in to retrieve your favourite recipes.'. It includes a text input field for 'Enter Email or 10 Digit Phone Number', an orange 'Continue' button, a 'or' separator, and a 'Login with Google' button. The footer contains links for 'Cakes & Brownies', 'Classic Crumbles', 'Mithai with a Twist', 'Mood Melts', 'Chef's Special', 'Terms & Conditions', 'Privacy Policy', 'Contact Us', and 'Sitemap'.

EMAIL AND NEWSLETTER SUBSCRIPTIONS

Website Feedback Survey

Write your Say?

***Required**

Is this the first time you have visited the website?

Yes

No

How have you used our website today?

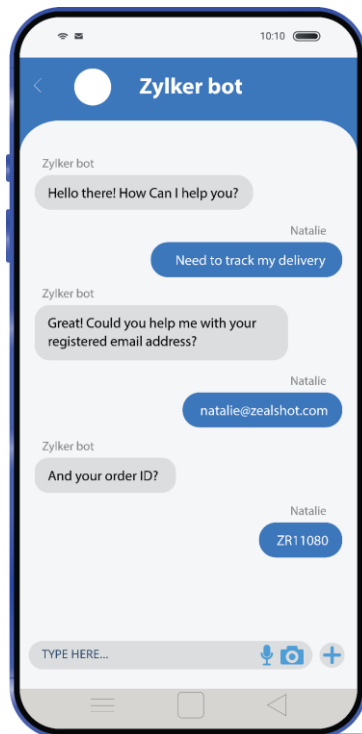
To find information

To find documents

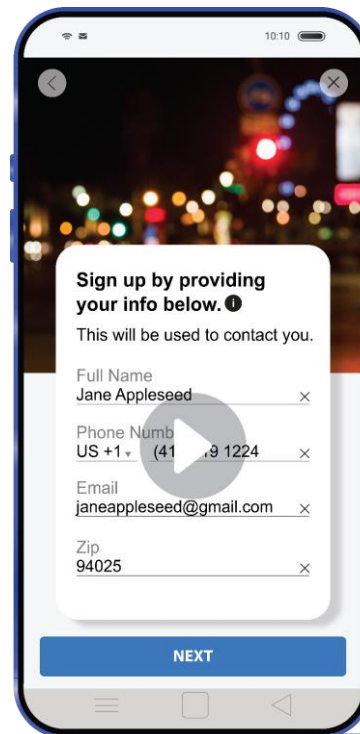
SURVEYS & FEEDBACK

How do you collect 1P data?

ONLINE



DIRECT CHATS
(chatbots,
customer
service, social
media
messages)



LEAD GEN FORM CAMPAIGNS

Example: Social media
& Advertising
platforms, Affiliates,
WhatsApp

Additionally, 1PD
can also be
collected through
**COLLABORATIONS
& PARTNERSHIPS**
with Media Partners
TV, OTT, etc. with
the help of
sponsorships

How do you collect 1P data?

OFFLINE



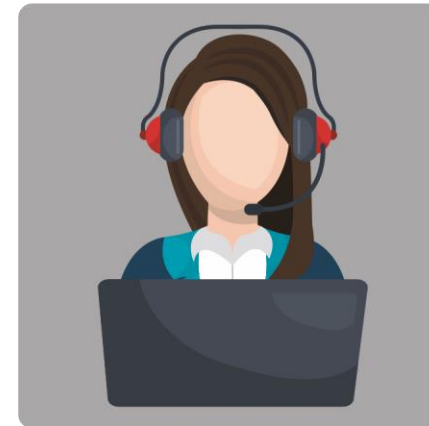
PRODUCT PACK
(scan QR code)



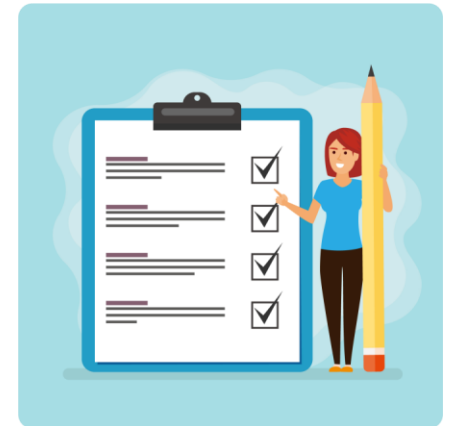
RETAIL OUTLETS
(such as for banks,
or salons)



**SALES
REPRESENTATIVES**



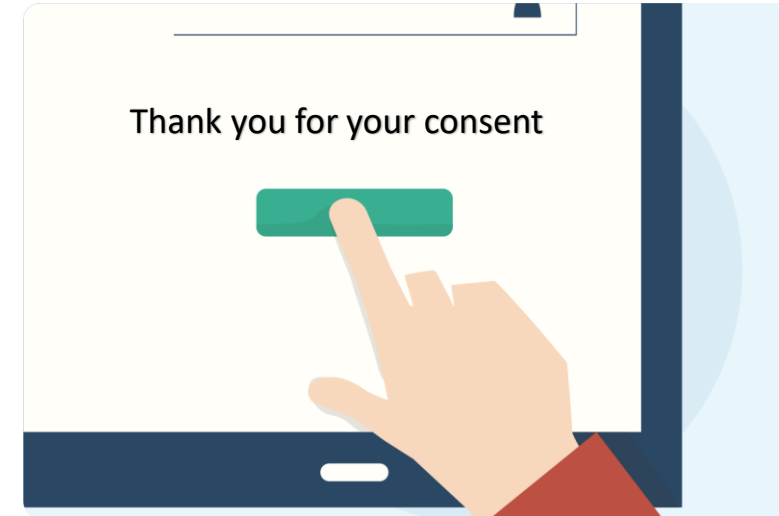
**CALL CENTRE /
CUSTOMER SERVICE
INTERACTIONS**



**SURVEYS
AND FEEDBACK**

▶ Acquiring Consent from customers for collection of first-party data

- ◀ It is imperative for companies to **design a procedure** to acquire consent from users while collecting the personal data via Online or offline channels.
- ◀ This procedure should also inform the user about the **purpose** for which the data is to be processed.
- ◀ The details of **Digital Personal Data Protection Act (DPDPA)** are covered in detail in the Section 5 (Legal)



Segmentation & Enrichment of data

ENRICHMENT

What is Data Enrichment?

Data Enrichment is the practice of revitalizing 1P data, ensuring it stays current by incorporating the latest behavioral attributes.

This process typically entails merging internally sourced 1P data from channels like websites, apps, landing pages, and CRMs with data obtained from other internal or third-party external sources, such as paid campaign data.



Segmentation & Enrichment of data

ENRICHMENT

To illustrate, data management platforms often organize data in tabular formats. In the table, columns marked in blue are relatively static, changing infrequently. In contrast, behavioral segments like life-events and in-market/affinity status are prone to frequent changes (marked in yellow). The process of Data Enrichment ensures that the data is consistently refreshed with the latest attributes of consumers.

Cookie ID	Device ID	Latest Event	Device	Location	Age	Gender
GX1.2.12349876.1500h6448	00000000-89ABCDEF-0123SDA	10 Dec 22 at 00:36:56	Android 12.3	Mumbai	33	Male
GX1.4.45553.11230034667	00000000-89ADSDW-054BSDS	10 Dec 22 at 00:36:56	Android 14.3	Bangalore	42	Female

Life Event	IN-Market 1	In-Market 2	In-Market 3	Affinity 1	Affinity 2	Affinity 3
Birthday	Residential Property	Air-conditioner	Books	Cricket	Football	Outdoor Sports
Anniversary	Wedding Accessories	Sunglasses	Vacation Packages	Avid Investor	Foodie	Pet Lover

Why is Data Enrichment important?

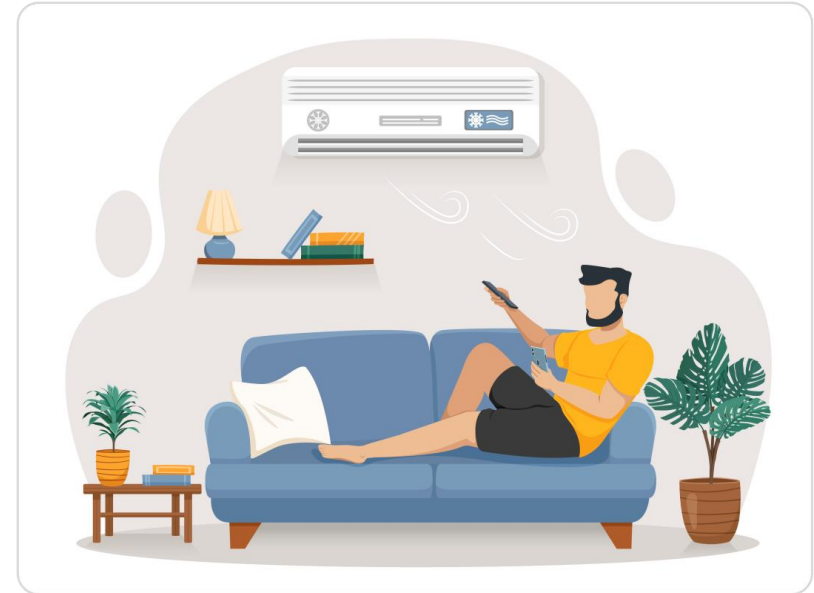
The key benefits of Data Enrichment include:

- ◀ **Audience insights - Richer Insights About Audience and Preferences:** By continually updating and enriching 1P data, marketers gain deeper insights into the ever-changing preferences and behaviors of their audience. Example – knowing consumer's in-market preference for AC, can help an AC brand for better comms and placement.
- ◀ **Better strategic interventions:** Insights derived from enriched 1P data empower marketers for strategic adjustments to align with evolving consumer trends. Example: for an AC brand, it can reveal particular Geo preferences, which are not factored in conventional marketing, which helps in better market prioritization.
- ◀ **Better Deployment - Look-alike Audiences and Activation Channel Optimization:** A better understanding of the audience enables the creation of look-alike audiences. Marketers can leverage this knowledge to optimize activation channels more effectively, reaching audiences with similar characteristics & preferences.
- ◀ **Better experience - Personalized Content and Communication:** Enriched data points provide the foundation for personalized content and communication strategies. Marketers can tailor their messaging to align with individual preferences, enhancing the overall customer experience.

When does Data Enrichment become relevant?

Enrichment of 1P data becomes more relevant the moment it gets dated, so keeping the consumer's attributes (affinity, in-market status, life-events, job profile, HHI) updated is important to enrich the data.

Example: A consumer who is right now in-market to buy an air-conditioner won't remain in-market / interested forever, his journey ends once he purchases the product and then he may move to buy something else. Like that depending on the category consumers choices are continuously changing and their online behavior will also change accordingly.



Means and forms to enrich data after acquisition

Advertisers these days have 2 sources.

INTERNAL SOURCES

- ◀ **Utilizing campaign data:** Leveraging campaign data, you can ensure the continuous refreshment of your 1P data with the latest audience attributes.
- ◀ **Leveraging customer data attributes:** Recency, frequency, and monetary value, to feed back into your first-party (1P) marketing data. This is beneficial in categories characterized by frequent repeat purchases or where a brand aims to maximize the lifetime value (LTV) of a consumer.

EXTERNAL SOURCES

- ◀ **Direct Partnerships:** An advertiser can also use direct partnerships with data aggregators / platforms like PayU, Lifesight to enrich their data.
- ◀ **Data Clean Rooms:** Some evolved advertisers are adopting solutions known as "Data Clean Rooms" (DCR) to enrich their 1P data beyond basic fields.

Data clean rooms

Let's understand DCR a little more in detail. Data Clean Rooms are potential “Messiah” in Cookie-less World because of following reasons:

- ◀ Ensures **robust consumer insights**.
- ◀ **Maintaining privacy** and **yet identifying the similarities** in the data sets.
- ◀ Can understand deeper insights like interest, intent, purchase intention and more, of first party data for **richer segmentation and data enrichment**.



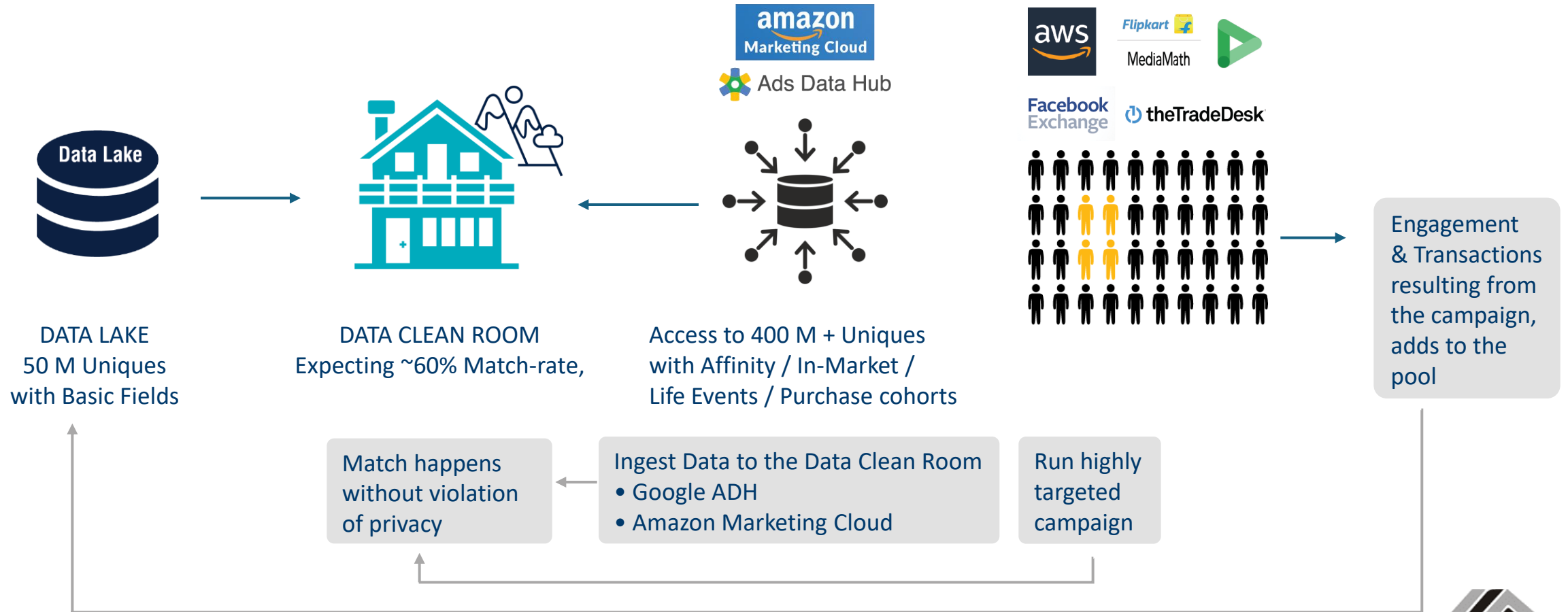
Data clean rooms

Let's understand DCR a little more in detail. Data Clean Rooms are potential “Messiah” in an enhanced privacy and user opt out world because of following reasons:

- ◀ Ensures **robust consumer insights**.
- ◀ **Maintaining privacy** and **yet identifying the similarities** in the data sets.
- ◀ Can understand deeper insights like interest, intent, purchase intention and more, of first party data for **richer segmentation and data enrichment**.



Data clean rooms

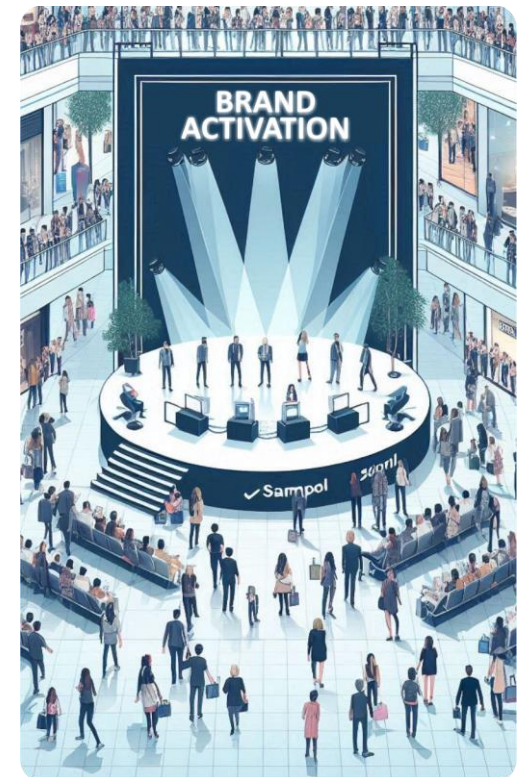


Activation

1PD can be shared with partners to reach consumers, with each partner having unique deployment methods.

For example, Meta enables the targeting of lookalike audiences similar to your 1PD to enhance reach and allows cohort creation within 1PD. 1PD can be used for one-to-one and one-to-many communication on Google and Meta, and one-to-one communication on WhatsApp, SMS, or CRM ecosystems.

The table in the next slide highlights top providers that enable brands to upload hashed 1PD and target audiences with native creative formats. It also outlines each platform's capabilities, use cases, and tools to enhance the data.



Possibilities across platforms

Platform	1PD Types supported	Mode Of Deployment	Lookalike Possible or not	Additional 1PD Cohorts Possible	API/CRM Integration	Note
Meta	Cookie based, Customer List, CRM Database	Pixel for Cookie based, Excel for Customer List & Zapier type connectors for CRM integration	Yes	Cross Sell, Upsell, Add to cart, Website visitors & past Purchasers	Yes	
Google/ Gmail	Cookie based, Customer List, CRM Database	GA Tag, Excel for customer data & CRM Integration	No	Cart Abandoners, Past purchasers, Website Visitors, Category Affinity	Yes	
DV360	Cookie based, Customer List, CRM Database	DV Tag, Excel for customer data & CRM Integration	NO	Cart Abandoners, Past purchasers, Website Visitors, Category Affinity. Custom cohorts can also be built if custom parameters have been passed through DV Tag.	Yes	
Paytm	Customer List	Excel file with hashed data	Yes	No	No	
Phonepe	Customer List & CRM Database	Avatar: 1PD tool by Phonepe	Yes	No	Yes	
Cred	Customer List	Excel file with hashed data	No	No	No	
Criteo	Cookie Based	Criteo Pixel	Yes	Cart Abandoners, Website visitors, Past purchasers, Cross sell & Up sell based on website behavior	Yes	
Whatsapp	Customer List & CRM Database	Excel with Phone no. & Name is must	No	Custom cohorts can be built based on user behavior understanding like discount seekers or Lost users or Loyal users	Depends on tool being used	Deploymet of 1PD for WhatsApp will depend on the tool being used for sending Whatsapp messages.
SMS (Various partners)	Customer List & CRM Database	Excel with Phone no. & Name is must	No	No	Yes	
OTT	For optimal utilization of first-party data (1PD) on OTTs, it is advisable to implement OTT campaigns through DV360. This is because the majority of OTTs lack the capability to process & match 1PD and generate lookalike audiences. OTT					



1P Data Use Cases

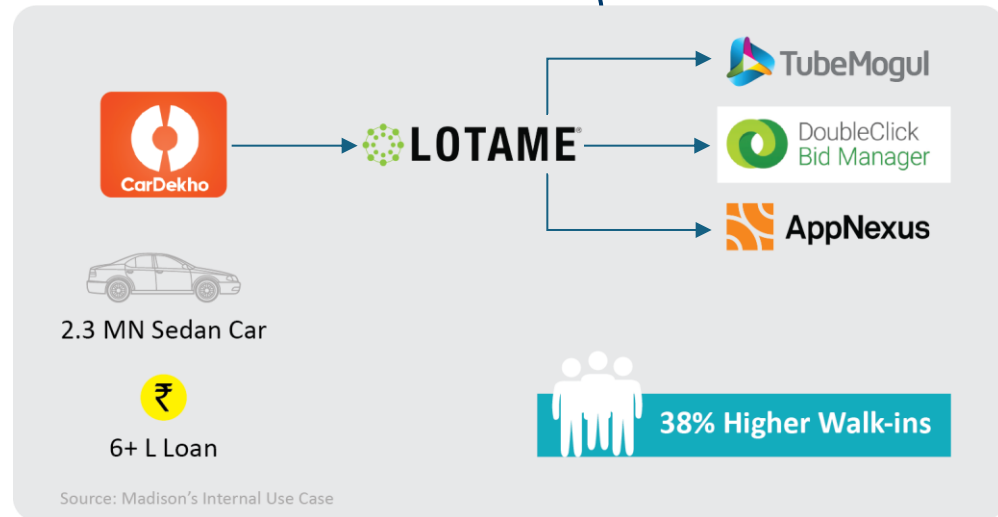
LEADING PROPERTY DEVELOPER IN INDIA



Objective: Increase Walk-in to the Phase 2 Launch of the Township in Ahmedabad.

Data strategy stage: Acquisition / enrichment / usage insight from the Local Sales Team at the site: People who walk-in to book a flat often come in Sedan Car.

Approach: Tied up with Car Dekho (Girnar Soft) targeting consumers who were closer (signed-up for test drives) towards buying a car valued between Rs.6-10L and showcasing tailored communication.



Colgate Visible White Case Study



COLGATE VISIBLE WHITE

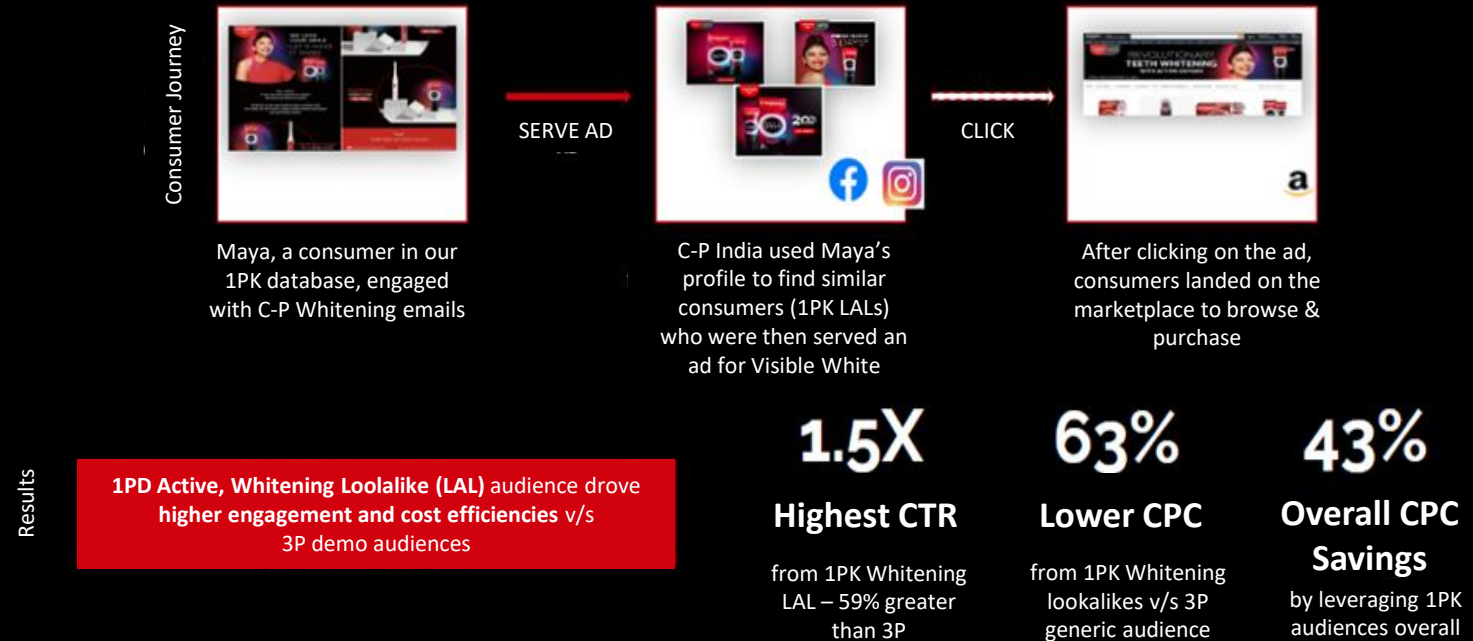
Objective: Activate 1PD + LAL audiences on Meta

Approach: Created relevant segments within the 1PD database and deployed a scaled LAL audience on Meta.

Results: Using 1PD led LAL audience improved media metrics like CTR and CPC – enhancing effectiveness & Efficiency.

Whitening Campaign in action

Demonstrated value of 1PD in driving incremental impact in effectiveness (Reach/Engagement) & Efficiency (Campaign Cost)



McDonald's Case Study



MCDONALD'S

Primary Marketing Objective(s):

- Increase Guest Count (GC)
- Reduce cost per GC

Challenge :

McDonald's faced the challenge of increasing engagement among its existing offline users and app user base. It identified two groups: users who had been inactive online and users who had never used the McDonald's app to redeem offers online in the last 3 months. Additionally, needed to achieve these objectives while maintaining a cap on the cost.

Target Audience:

1. Offline users who had never used the McDonald's App but had transacted in offline stores.
2. App users who had not made any transactions on the app or in-store within the last 90 days.



McDonald's Case Study Continued



Approach

Executed a demand gen campaign targeting increased guest counts and lowered cost per guest by leveraging diverse Customer Match lists derived from first-party data (1PD). The 1PD was pulled using “Bulk Data Export (BDE)” functionality, this allows us to pull transaction level data from our App & feed it into our CDP. Leveraged creative communication to promote loyalty points for accessing complimentary products or discounts. Successfully implemented this strategy through performance marketing, harnessing the power of first-party data. Furthermore, utilizing AI-powered bidding and measurement capabilities, the demand gen campaigns facilitated optimization for high traffic, convert valuable users, and efficient bidding based on key metrics.

Results Key Highlights:

Using First Party Data Demand Gen exceeded expectations by driving cost-efficient re-engagement across the product mix. With Demand Gen, existing users saw a 9% conversion lift over the current product mix, at a 12% lower cost per guest count.

- 9% Increase GC from offline user's base
- 12% Decrease in Cost per Guest Count



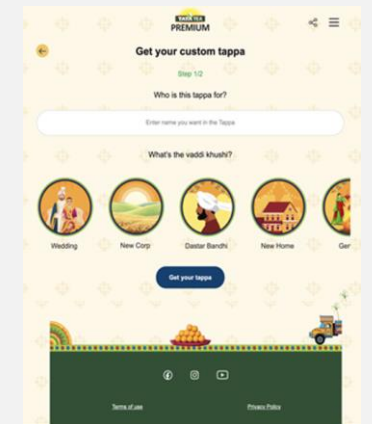
Tata Tea Premium Case Study



TTP LOHRI CAMPAIGN (Punjab & Haryana)

Overview: As part of the sustenance campaign, TTP aimed to cultivate awareness, boost market penetration, and underscore its identity as the pride of Punjab among women aged 24-54 residing in urban areas of Punjab.

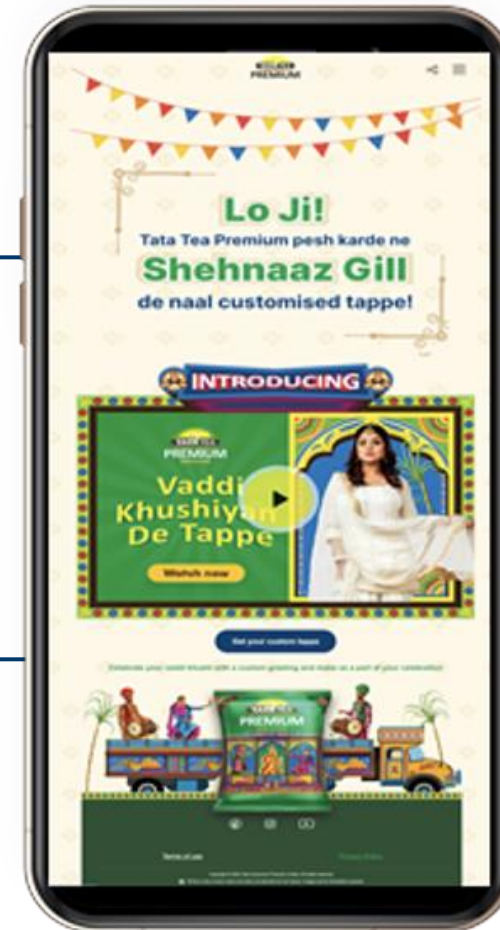
First-Party Data Utilization: In line with the brand's hyperlocal approach, TTP embraces region-specific festivals. Leveraging technology during the significant Lohri celebrations in Punjab, the brand enabled users to craft personalized greetings for their loved ones. These custom greetings were delivered to the consumers' personal WhatsApp numbers, facilitating first party data collection in the form of phone numbers. The brand enhances targeting on Meta by incorporating 1PD collected, refining parameters such as Age, Gender, and specific locations. Utilizing this data-driven approach in our sustenance campaign.



Tata Tea Premium Case Study- Conti.



Results: The brand implemented the campaign for a month (30 days) with a 10-second video edit, evaluating the performance of regular targeting against first-party data (1PD) / lookalike-based targeting. 1PD-driven targeting resulted in a 14% higher VTR compared to regular targeting on Meta and a noteworthy 46% reduction in CPV.



Tata Tea Gold Care Case Study



TTGC MOTHER'S DAY CAMPAIGN

Overview: Through the Mother's Day campaign-TTGC want to give the consumers a unique opportunity to express their gratitude to their mothers by gifting them a customized Tata Tea Gold Care pack having a picture of our consumer with their mother along with a special message.

First-Party Data Utilization: With the multimedia campaign across Print, OOH, Digital & Influencers, the brand encouraged consumers to share the entries on the brands website for customized packs. Thereby, generating 5,000+ unique entries with the multimedia campaign facilitating first party data collection in the form of phone numbers.



Tata Tea Gold Care Case Study- Conti.



First-Party Data Utilization (Contd.) : The brand re-engaged with these consumers for announcing shortlisted winners and gratitude for participating and incentivizing by communicating via WhatsApp to the participant/consumers by the brands WhatsApp bot.

Further the brand used the 1PD to share back 50% exclusive discount coupons to the winners as well as the non-winners of the custom TTGC Mother's Day pack driving them to our D2C website Nutrikorner for purchase.

Results: 50,000+ visits to the microsite, 5,085 Entries and 1000 shortlisted winners. 50% discount voucher was redeemed by these campaign exposed customers resulting in additional revenue generation during the campaign period, at a minimal/no cost



Tata Salt Case - Study



HAQ 2023 + ALL INDIA CAMPAIGN

Overview: Tata Salt launched a Republic Day campaign with the objective to give the innocent questions of children of today who will go on to become the future of the country tomorrow to ask their innocent questions about the progress of the country to the government and leading authorize via its media channels. Tata Salt leveraged its WhatsApp chatbot to collect these entries of young kids through their parents by asking parents to help submit their entries. As part of the collection drive, the brand enabled a WhatsApp chatbot collection of the name, age, entries as well as parents name and email address. The best entries were also showcased in print ads of each city (localized) and also on Tata Salt's social media pages.



Tata Salt Case Study- Continued.



First-Party Data Utilization: The brand collected over 21,000 entries (phone numbers, names, pin codes and email id's) triggered via missed calls that triggered the chatbot of which the brand received 14,781 unique entries.

During the campaign the brand reused the chatbot to share back the 26th Jan TVC with these parents back on the WhatsApp channel.

Results: This resulted in adding more followers of the brand and using the audience base for retargeting in the next campaign at a lesser cost.



Tata Soulfull Case Study



Campaign Overview: Collected 1PD details in 3 ways

- ◀ When a new customer lands on the website, a form pops out after 10 sec asking the customer to submit details and get a 10% discount code for purchase.
- ◀ Whenever a customer places an order from the website, he/she must input email ID, phone number and address along with first and last name.
- ◀ The brand collects birthdate and gender details on the thank you page after the order is placed.



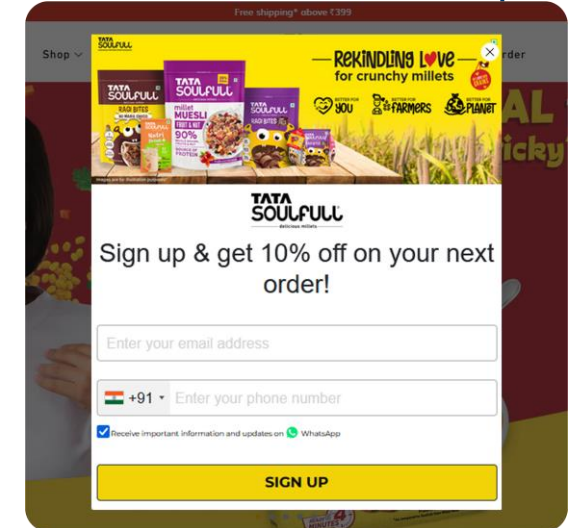
Tata Soulfull Case Study



First-Party Data Utilization: Cases discussed on usage of collected 1PD

- ◀ Performance campaigns using FB / YT for exclusions: The brand uses the customer list for exclusions in our new user acquisition campaigns to optimize it and ensure that we reach out to new users only. The customer list is also used to create look-alike audiences on Meta & YT to reach similar users across platforms.

How?: The brand runs interesting promotional offers for new customer acquisition. The exclusion of our existing user base from these campaigns allows us to ensure that the acquired customers are not exposed to this ad and they do not leverage this offer. It also helps us utilize the marketing funds to reach only to new customers, thus optimizing the spends and ensuring a higher number of new acquisitions.



Tata Soulfull Case Study- Continued



- ◀ Remarketing campaigns for cross selling / upselling: The brand uses the customer list in our remarketing campaigns on Google and Meta to show the product catalogue to these set of customers. This reduces the overall marketing spend and helps improve the overall conversion rate as the user groups targeted are past purchasers hence creating a purchase moments cycle.

Results: The cost per order for this campaign is 1/4th as compared to other campaigns with 3X ROAS. The conversion rate is 9.8% which is much higher compared to ~2% from other campaigns. AOV for returning customers is 37% higher as compared to AOV for new acquisitions.

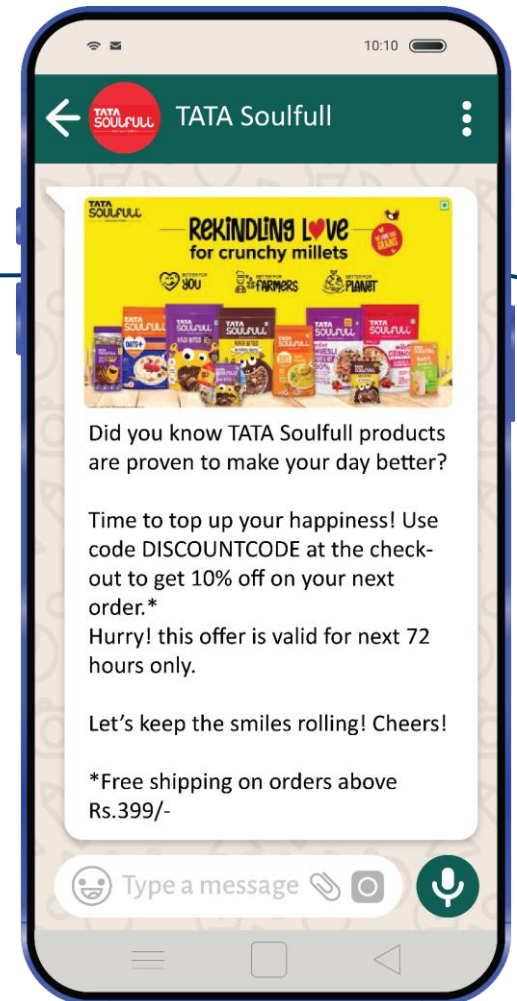


Tata Soulfull Case Study- Continued



TATA SOULFULL

- ◀ Email and WhatsApp notifications based on segments: The brand segments have their existing customer list basis criteria like number of orders, past purchases, etc. and they reach out to these specific segments via email and WhatsApp automation journeys to upsell/cross sell. They also drive sale/offer related comms to focus on growing specific products categories in the overall D2C revenues via targeted comms to existing user base.
Results: Using this kind of segmentation, the brand has been able to ensure that they scale up revenue from different categories. Before making these automations live, Muesli used to account for over 80% of the D2C revenue. Now, Muesli accounts for 55%, NPD 28% and Ragi Bites and Oats for the remaining 17%. The retention rate is a healthy 40%. The brand keeps the creatives interesting such that even if the brand doesn't get conversion, there is a fair amount of awareness created.



Tata Soulfull Case Study



- ◀ **Brand Love Campaigns:** The brand uses the birth dates collected to send hampers to their customers on their special day, resulting in sales uplift.

How?: Such activities enable us to generate loyalty and love for the brand. We can collect feedback, reviews, testimonials etc. which we use for other marketing activities on social media. We also promote brand merchandise which acts as keep sakes with the customer leading to a special association between the customer and the brand.

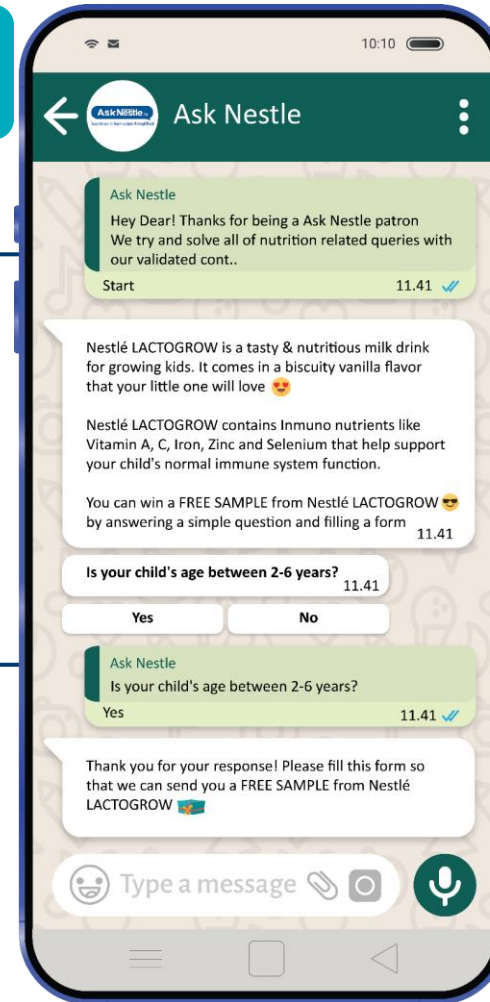


Nestle - Toddler Nutrition Brand Case Study



Approach: Access to the in-category audience for sampling drives. Feedback survey pre-product launch

Results: 63% lower cost per sample



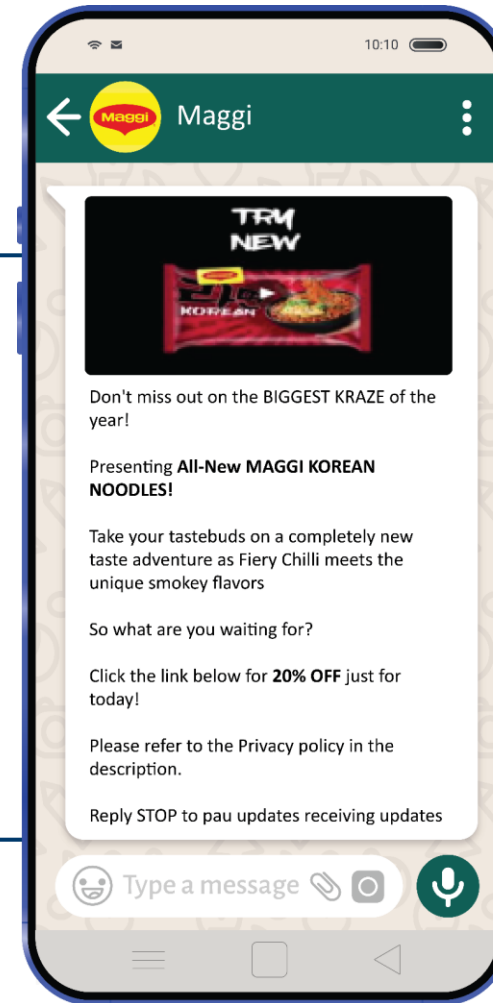
Nestle - Maggi Case Study



KOREAN NOODLES CAMPAIGN EXTENSIONS / NPD LAUNCHES

Approach: Engaged the community with exclusives / previews. Gauged immediate response to product promotion.

Results: 2X uplift in units sold in a week



Nestle - Maggi Case Study

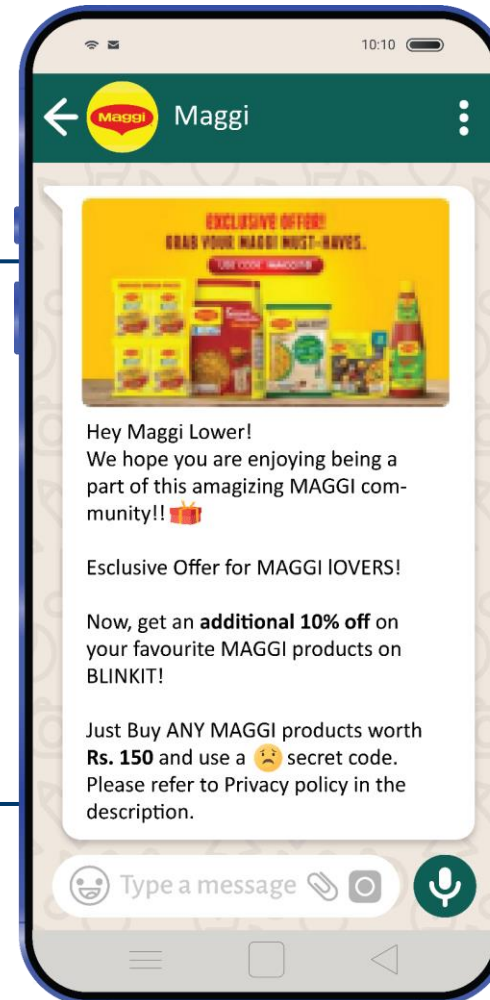


DEMAND GENERATION

Approach: Using PII data to generate Cross Brand sales, Increasing Basket Value on ecommerce

Results:

- ◀ 40% higher transactions in 2 days
- ◀ 24% uptick AOV; 1.84 ROAS





SECTION 4

Evolution of data-driven marketing tools and techniques

Evolution of Data-Driven Marketing Tools & Techniques

Evolution of data driven marketing capability is characterised by both the tools & techniques that are used as well as how they are managed. We wanted to **identify the tools and techniques used, when it is appropriate to bring them in**, and who should manage them.

This should **enable organizations to spot gaps** in their current skillset and establish the most efficient change management programs to remedy.

We have grouped these tools and techniques **under early stages, mid-level, and Advanced.**



What are the tools & techniques used by organizations moving from developing to mature?



EARLY STAGE

- ◀ Data Driven Digital Media Planning
- ◀ Demand Side Platform (DSP)
- ◀ Segmentation & Audience Targeting
- ◀ Campaign Analysis and Performance Reporting



MID-LEVEL

- ◀ Data hygiene & cleansing
- ◀ Addressable Media Buying
- ◀ Real-time Optimization
- ◀ Capability build/training
- ◀ Dynamic Creative Optimization



ADVANCED

- ◀ Data Modelling
- ◀ DMP / CDP Development
- ◀ Clean Room Development
- ◀ Personalization

1. Early Stage

Early Stage tools and techniques are traditionally managed by the media agency under a standard scope of work. These are often the first tools and techniques to be transitioned to internal management.

- ◀ **Data Driven Digital Media Planning:** No one addresses this in-house, with slight majority of both Developing and Mature tasking agencies to manage.
- ◀ **Demand Side Platform (DSP):** A sign of development, with management moving from outsourced to agency partners, to shared responsibility and ultimately mature organizations tend to in-house.
- ◀ **Segmentation & Audience Targeting:** Mature organisations twice as likely to inhouse this capability vs those developing.

- ◀ **Campaign Analysis and Performance Reporting:** Majority of Developing and Mature rely on agencies or share responsibility. The more mature an organisation is, the more likely to manage analysis and reporting internally.

The initial step in leveraging 1P data involves using audience managers integrated within DSPs such as Google Ads, Meta, and DV360, ensuring user consent for data collection.

Tools to be leveraged: Built-in Audience Managers of DSPs like FB Audience Manager, Google Audience Manager.

2. Mid-Level

As organizations start to mature, the tools and techniques used become more complex but also more value generative. We believe internal training becomes necessary at this stage, as the workstream has moved beyond an in-housing of the media agency's traditional scope of work.

- ◀ **Data hygiene & cleansing:** More effective use of tools and techniques than in the early stage, driven by better quality data. 60% of Mature organizations manage this in-house, while Developing organizations tend to rely on agencies.
- ◀ **Addressable Media Buying:** Better planning and segmentation allows value creation through addressable media buying. Irrespective of data-driven marketing maturity, most organizations rely on their agency partners to manage this, as just 13% of Mature organizations have brought this in-house.

- ◀ **Real-time Optimisation:** Similar to addressable media buying, this technique becomes more efficient once earlier stages are complete. All Mature organizations who responded utilize real-time optimization, however, this drops to 59% of Developing organizations. Very few organizations have taken this in-house; the majority ask their agencies.
- ◀ **Capability build/training:** A lack of internal understanding or appreciation for value potential is likely to be a blocker to further progress along the path to maturity: we're glad to see this is relatively rare with 75% of developing organizations delivering some form of capability build approach
- ◀ **Dynamic Creative Optimization (DCO):** Adoption of DCO to customize ad creatives in real-time based on user data, optimizing for performance by automatically adjusting elements like images, text, and CTA. Majority rely on agency partners for management, although more Mature organisations may then bring it in-house.

2. Mid-Level

Tools to be leveraged:

Data Management Platforms

(DMP): Data management platform is a data warehouse. It's a piece of software that captures, sorts and houses information, and delivers it in a way that's useful for marketers. Predominantly used for top funnel marketing.

Leading DMP Players:



Customer Data Platforms (CDP):

Customer data platform is a type of packaged software that creates a persistent, unified customer database (PII) accessible to other systems. Data is pulled from multiple sources, cleaned and combined to create a single customer profile. Predominantly used for strengthening bottom funnel.

Leading CDP Players:



Data Storage: Is a platform where all your 1P data reside and it has native capability to integrate with any tech layer (DMP / CDP) an advertiser is using to segment and activate the data across activation channels like (Google, DV360, Meta, App Nexus).

Leading DS Players:



3. Advanced

- ◀ **Data Modelling:** This is a marker of true maturity. Mature organizations using data modelling are as likely to be managing it in-house as they are to out-source: we believe both approaches have merit, providing this choice has been made deliberately. For example, an external party can bring a valuable outside-in approach to the analysis of 3P data, but there are risks inherent in providing 1P data externally. We suggest a careful assessment of desired outcomes before selection of the team responsible.
- ◀ **Database/CDP Development:** There is a strong trend to in-house management of this tool, and pleasingly this is visible for Developing organizations as well as Mature.
- ◀ **Clean Room Development:** The use of Data Clean-Rooms tends to be one of the final tools adopted and is one of the areas where the difference between Mature and Developing organizations is most pronounced. We believe this is more of an indicator of maturity than a cause – reflecting the change in ability and associated increased confidence that comes with growing maturity. The increased use of data clean rooms with partners and retailers will be a trend we expect to see significant growth across 2024 as organizations seek new ways to capitalize on data modeling and targeting.
- ◀ **Personalization:** Tailor the overall content and user experience based on individual preferences and behaviors. Majority rely on agency partners for management, although more Mature organisations may then bring it in-house.

Advanced tools to be leveraged:



Ads Data Hub



KEY LEARNING

Most mature organizations initially tasked their agencies to manage the deployment of more advanced tools and techniques, before evolving to a shared and then internally focused management model. However, this list in the previous slides is not intended to be prescriptive, and many tools and techniques will remain with external agencies all along the path to maturity

Things to consider

- ◀ **Thoroughly assess how each of these potential tools could drive your ROI**
- ◀ **Assign a priority to each based on value and time required to onboard**
- ◀ **Make an active choice of the optimal provider for each tool in isolation, and then any dependencies created. Try to avoid letting any of them be deployed internally or externally by default.**





SECTION 5

Legal compliances to be observed for Data privacy and Data management.

Digital Personal Data Protection Act (DPDPA)

- ◀ The DPDPA requires providing notice and obtaining consent from a user on or before processing personal data.
- ◀ As per the Act, an express consent is required to be taken from the Data Principal before processing the personal data and the purpose for which the same is proposed to be processed.
- ◀ It is imperative for companies to design a procedure to acquire consent from users while collecting the personal data via Online or offline channels. This procedure should also inform the user about the purpose for which the data is to be processed.
- ◀ For instance, for the online channel, a company can include the tick box feature to acquire consent and accept the terms and conditions and the privacy policy that contains how the collected personal data is proposed to be used by the company.

The DPDPA particularly states **the type of consent** that needs to be acquired from consumers

- ◀ The consent should be freely given, specific, informed and unambiguous, with clear affirmative action. The consent should be limited to such personal data as is necessary for the specified purpose in the request for consent.
- ◀ Every request for consent should be in a clear and plain language, and such a request should contain the contact details of a Data Fiduciary's authorized personnel responsible for responding to any communication from the data principal for the purpose of exercise of the data principal's rights.
- ◀ The data principal has the right to withdraw their consent where consent is the basis of processing of their data. The ease of such withdrawal should be comparable to the ease with which consent was given. Upon withdrawal of consent, the data principal is required to cease and cause its data processors to cease processing of the personal data within "a reasonable time.
- ◀ A data principal may give, manage, review or withdraw their consent to the data fiduciary through a Consent Manager. The Data Fiduciary shall, before processing any personal data of a child or a person with disability who has a lawful guardian, obtain verifiable consent of the parent of such child or the lawful guardian.

The DPDPA particularly states the **type of consent** that needs to be acquired from consumers (Contd.)

Section 5 of the DPDPA states that Data Fiduciary should give a notice to the user or the Data Principal for collecting personal data before or at the time of requesting consent and should inform the user or the Data Principal about:

- ◀ The description of personal data which is to be processed.
- ◀ The purposes it may be used/ processed.
- ◀ Option to access the notice in any language.
- ◀ And if the consent was obtained before the commencement of the Act, the Data Fiduciary to give a similar notice as soon as practicable.

The major Indian legislative and regulatory policies covering data management

- ◀ **Digital India Bill:** Expected to be released in 2024, setting the law on online civil and criminal offences. ([Here](#))
- ◀ **Digital Personal Data Protection Act, 2023:** Regulates personal data collection of consumers by organizations. ([Here](#))
- ◀ **Digital Competition Law:** An ongoing discussion governing how digital companies conduct operations in India. ([Here](#))
- ◀ **Data privacy landscape:** An overarching set of principles governing the laws around digital operations in the country.
- ◀ In addition, there are Advertising Rules and IT Act and IT Rules governing consumer interactions.

The essential governance principles for 1st party data security are:

Security of First-party Data is evolving extensively due to its strategic importance. Organizations choose a security framework depending on the volume of the data available (from a few 000s to millions), usage (sporadic to every day) and refresh rates.

The essential governance principles are:

- ◀ **Access:** Enable access to all or parts of data as needed by “role” and by use. Limit access to only parts of the data needed to fulfill a task.
- ◀ **Consent:** Consumer to give informed consent for data collection and purpose for which personal data is proposed to be used.
- ◀ **Centrality:** Have a central department for data collection and management to avoid multiple departments creating their own data silos and strategies
- ◀ **Storage:** Store data in forms which restrict easy access and sharing.
- ◀ **Criticality:** Collect only those data which are critical for the business to avoid over-reliance on data points which do not yield value

In addition to these principles, it is important for organizations, particularly those based out of India to whom Europe's GDPR is applicable and are dealing with user data in India, to manage data in accordance with prevalent laws such as Europe's GDPR along with and India's DPDPA.

Lack of governance or security could have serious implications on organizational reputation and legal repercussions.

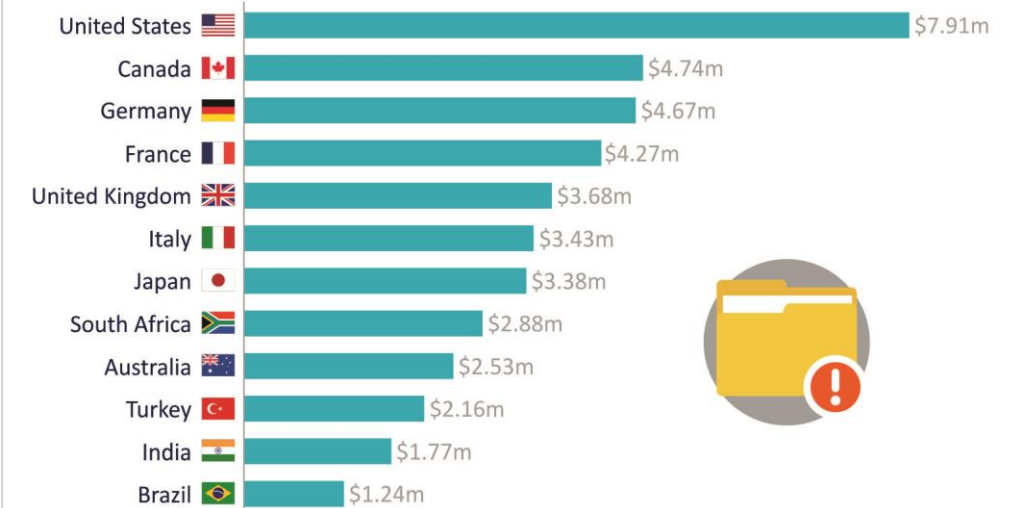
A data breach can be caused deliberately because of a malicious act from an external or internal party. It can also be caused by human error or by a failure of an organization to implement effective information management or security systems.

Some examples of harm arising from a data breach include:

- ◀ **Reputational damage:** An organization could be perceived as non-trustworthy, and consumers would be reluctant to engage with the organization.
- ◀ **Identity theft or fraud:** Malicious actors would get access to sensitive information and masquerade as genuine consumers and avail benefits (for example, unauthorized use of credit cards due to access to security verification)
- ◀ **Financial loss:** Organizations may face financial penalties due to lawsuits or could have to bear the cost of servicing inauthentic consumers. In extreme cases, lax security principles could also lead to hackers demanding ransomware.

Average Cost Of A Data Breach Highest In The U.S.

Average total cost of a data breach by country in 2018



@StatistaCharts Source: IBM



Forbes statista



SECTION 6

Industry Action Required

Individual advertiser

- ◀ **Assess the need for first-party data** collection and investment by analyzing whether it aligns with the brand's objectives, target audience, and available resources.
- ◀ If deemed appropriate, **invest in data infrastructure and capabilities** to collect, analyze, and activate first-party data effectively.
- ◀ Put processes in place to **acquire consent from consumers** for first party data collection and to inform consumers of the purpose for which personal data is proposed to be used.
- ◀ **Prioritize data privacy and compliance** to ensure ethical and responsible use of customer data.
- ◀ **Foster a culture of data-driven decision-making** across the organization, empowering teams to leverage data insights to drive business outcomes.
- ◀ **Ensure compliance** with applicable laws.

Joint Industry Body

Advertisers, Media Agency & Digital Platform Association

- ◀ Collaborate on industry-wide standards and best practices for first-party data collection, usage and privacy.
- ◀ Advocate for policies and regulations that support responsible data practices and protect consumer privacy rights.
- ◀ Make industry aware of the relevant laws and compliance requirements to be observed.

By following the guidelines outlined in this playbook and taking proactive steps to leverage first-party data, brands can unlock new opportunities for growth, innovation, and customer engagement in today's data-driven world.



SECTION 7

Checklist of Compliance

Checklist of Compliance

Data Fiduciary: If your organization collects personal data of data principals for a specified purpose and determines the manner in which such personal data should be processed digitally, your organization would be a 'data fiduciary' and would have to comply with the obligations on data fiduciaries set out under the Act. If you are operating an offshore online platform offering your goods and / or services to the users in India and process the personal data of such users in order to offer such goods and / or services to them, you would be considered as a data fiduciary.

- ◀ Ensuring that you are only collecting personal data of data principals for a lawful purpose.
- ◀ Ensuring that personal data processed is consent based and with privacy notice.
- ◀ Implementing an appropriate technical & organizational measures to ensure effective observance of the provisions.
- ◀ Implementing reasonable security safeguards to prevent personal data breach and protect the personal data in its possession.

Checklist of Compliance

- ◀ Compliance with DPDPA irrespective of whether processing is undertaken by another processor / data fiduciary on its behalf or if the data principal is non-compliant with their duties.
- ◀ Implement appropriate technical and organizational measures to ensure effective adherence with the provisions of the DPDPA.
- ◀ Implement appropriate technical and organizational measures to ensure effective adherence with the provisions of the DPDPA.
- ◀ In the event of a personal data breach; notify the Data Protection Board of India (the “Board”) and each affected data principal in the form and manner as may be prescribed.
- ◀ Obligation to provide notice as per directions of the Act including for setting up Data Privacy officer, purposes, description of the personal data shared with such other data fiduciaries or data processors.
- ◀ Publish, in such manner as may be prescribed, the business contact information of a Data Protection Officer (“DPO”), if applicable, or a person who is able to answer on behalf of the data fiduciary, the data principal’s questions about the processing of their personal data. The DPO must be based in India and be responsible to the board of directors or a similar governing body of the data fiduciary.

Checklist of Compliance

- ◀ Rights of data principal to be recognized by Data privacy officer to honor deletion, modification, access etc.
- ◀ Subject to compliance of laws, deletion of data by itself and cause deletion by the data processor (as applicable), upon the data principal withdrawing her consent or as reasonably assumed that the specified purpose is no longer being served, whichever is earlier.
- ◀ Retention of personal data only for required purpose.
- ◀ Additional obligations for collecting or processing children's data- Otherwise a restricted data field, similar restrictions apply for personal data of persons with disabilities.

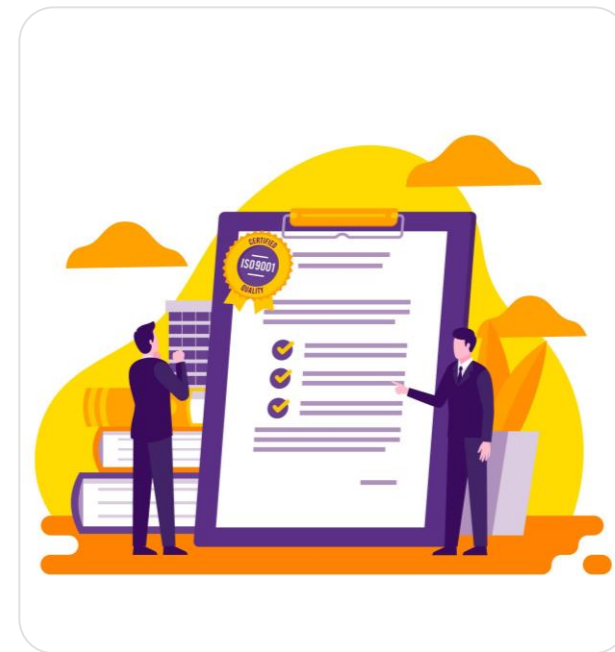
Data Privacy Compliance Landscape

- ◀ As per context above; Data breach reporting (CERT), IT Act and Rules and or any other sectoral laws, will continue to apply to them.
- ◀ Significant Data Fiduciary: Any data fiduciary or class of data fiduciaries as may be notified by the Government, on the basis of an assessment of such relevant factors as it may determine-volume and sensitivity, risk to rights of data principals, risk to security, sovereignty or public order of the State.
Following Additional obligations over and above obligations of Data Fiduciary needs to be carried out:
 - ◀ Periodic data protection impact assessment,
 - ◀ Periodic audit- Appointing an auditor: The significant data fiduciary must appoint an independent data auditor to evaluate the compliance of the significant data fiduciary with provisions of the Act.
 - ◀ Further data breach reporting, IT Act and Rules and or any other sectoral laws, will continue to apply to them.

Consent Manager / Consent Management Process

A consent manager is a person or an entity that acts on behalf of the data principal. The consent manager enables a data principal to give, manage, review and withdraw her consent through an accessible, transparent and interoperable platform.

A consent manager must be registered with the Board, and must adhere to the technical, operational, financial, and other conditions as may be prescribed by the Central Government. Data Fiduciaries and Data Processors need to be aware of such consent managers who are acting on behalf of Data Principal. Also, to ensure all obligations of consent manager and data fiduciary are duly carved out for division of responsibility. Further data breach reporting, IT Act and Rules and or any other sectoral laws, will continue to apply to them.



Data Processors

Anybody who is not strictly Data Controller / Data Fiduciary is a Data Processor. Data processors have no direct obligations under the Act. As per the understanding, Data fiduciaries are responsible for compliance by data processors processing personal data on their behalf. However, there is less likelihood of a pure data processor entities as in some capacity or the other they will be Data Fiduciary, as the definition and ambit of data fiduciary is quite wide.

In case entity identifies as pure data processors- they should comply to requirement of Contract with their data fiduciaries or with sub processors or data centres, adherence to safety security standards for data processing activity and that all technical and organizational measures as carved out by the Data fiduciary in the contract should be fully complying. Further data breach reporting, IT Act and Rules and or any other sectoral laws, will continue to apply to them.



Data Protection Board of India

The Board is an adjudicatory body proposed to be established under the DPDPA. The Board will comprise a chairperson and some members to be notified by the Government. Civil courts are banned from adjudicating in any matters in which the Board is empowered to do so.





Glossary

- ◀ **Consent Management:** The system or process for obtaining and managing user consent for collecting and using their data.
- ◀ **Consumer Insights:** Insights gained from first-party data analysis, providing a deeper understanding of consumer behavior, preferences, and needs, enabling businesses to tailor products, services, and experiences accordingly.
- ◀ **Cost Per Lead (CPL):** A marketing metric that measures the cost incurred by a company for acquiring a lead. It is calculated by dividing the total cost of lead generation by the number of leads generated.
- ◀ **Cookie:** A small piece of data stored on a user's device by a website, used to remember user preferences, track activity, and personalize the browsing experience.
- ◀ **Cross-sell/Up-sell Opportunities:** Identifying opportunities to recommend additional products or upgrades based on customers' past purchase behavior, maximizing revenue and customer lifetime value.
- ◀ **Customer Data Platform (CDP):** A software platform that aggregates and integrates customer data from various sources, such as CRM systems, transactional databases, and marketing automation tools. CDPs create unified customer profiles for personalized marketing and engagement.
- ◀ **Customer Lifetime Value (CLV):** The predicted net profit attributed to the entire future relationship with a customer.

- ◀ **Customer Relationship Management (CRM):** A system or strategy used by businesses to manage interactions with current and potential customers. CRMs typically store customer data, track interactions, and facilitate sales, marketing, and customer service activities.
- ◀ **Data Breach:** An incident where sensitive, protected, or confidential data is accessed, disclosed, or stolen without authorization, posing a risk to individuals' privacy and security.
- ◀ **Data Cleansing:** The process of detecting and correcting errors, inconsistencies, and inaccuracies in a dataset to improve its quality and reliability.
- ◀ **Data Collection:** The process of gathering information from various sources, including user interactions, forms, surveys, and other touchpoints.
- ◀ **Data Enrichment:** The practice of revitalizing first-party data by incorporating additional relevant attributes from internal or external sources, ensuring its accuracy and relevance for marketing interventions.
- ◀ **Data Fiduciary:** Any person who alone or in conjunction with other persons determines the purpose and means of processing of personal data.
- ◀ **Data Integration:** The process of combining data from different sources to provide a unified view or dataset.
- ◀ **Data Management Platform (DMP):** A centralized technology platform used by marketers and advertisers to collect, organize, analyze, and activate large volumes of audience data from multiple sources. DMPs help in audience segmentation, targeting, and campaign optimization.

- ◀ **Data Principal:** individual to whom the personal data relates. Where such an individual is a child or a person with disability, the term includes the parent or their lawful guardian.
- ◀ **Data Privacy:** The protection of personal information collected from individuals, ensuring compliance with privacy laws and regulations.
- ◀ **Data Processor:** An entity processing personal data on behalf of the data fiduciary, responsible for compliance with contractual obligations and security standards set by the data fiduciary.
- ◀ **Data Quality:** The measure of the accuracy, completeness, and reliability of data.
- ◀ **Data Segmentation:** The practice of dividing a dataset into smaller, more homogeneous groups or segments based on shared characteristics, behaviors, or attributes.
- ◀ **Display & Video 360 (DV360) Tag:** A snippet of code generated in Google's Display & Video 360 platform and added to a website's HTML to enable tracking and measurement of display advertising campaigns. DV360 tags facilitate audience targeting, conversion tracking, and performance analysis.
- ◀ **Google Analytics (GA) Tag:** A snippet of code generated in Google Analytics and added to a website's HTML to collect data about website visitors, their behavior, and interactions. GA tags are used to track website traffic, conversions, and other key metrics.
- ◀ **Lookalike audience / LAL:** A larger base of users who are similar in behavior to your 1P data. These are called Lookalike audiences and can be used to enhance reach.

- ◀ **Optimization:** The practice of continuously improving and refining strategies, processes, or content to achieve better results.
- ◀ **Personalization:** Tailoring content, recommendations, or experiences based on individual user preferences and behaviors.
- ◀ **Personally Identifiable Information (PII):** Any data that can be used to identify an individual, such as name, address, email address, social security number, or IP address. Protection of PII is crucial for privacy and data security compliance.
- ◀ **Second-party data (2P Data):** Refers to another company's first-party data that is shared directly between the two parties for mutual benefit.
- ◀ **Third-party data (3P data):** It is information collected by an entity that does not have a direct relationship with the individuals the data pertains to.
- ◀ **Value Exchange:** The mutual exchange of value between businesses and consumers, where consumers willingly share personal information in exchange for offers, exclusivity, personalization, or greater purpose from the business.