Outbrain and GDPR for Engage Customers
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Outbrain’s mission is to help people discover content that they can trust to be interesting, relevant, and timely for them. We do this by serving relevant recommendations to readers based on their interests. Outbrain and its Engage partners (“publishers”) have a common objective: communicating effectively with readers to ensure readers’ trust and continued engagement.

Privacy Program

Outbrain remains compliant with EU data protection laws. The General Data Protection Regulation (GDPR) is an evolution of existing EU privacy regulations. To comply with the GDPR, Outbrain enhanced its existing solid compliance framework for processing personal data.

More specifically, Outbrain launched a formal global privacy program which is fully documented in an internal Outbrain website. Outbrain’s privacy program centers around 8 promises, which Outbrain commits to comply with on a continuous basis. These 8 promises, are designed to be easily understood by everyone at Outbrain and are made by Outbrain to its staff, its Engage publishers/partners, its Amplify customers, its end users and to the various data protection authorities. For example, our Promise 1 is “Awareness: We each promise to be aware of privacy laws.” To implement the 8 promises, Outbrain has appointed a team of Privacy Champions. Each Privacy Champion has been allocated roles and responsibilities related to privacy. Our Privacy Champions are the key individuals within our organization responsible for enforcing our 8 promises. They are responsible for engaging other staff within our organization on privacy matters. Outbrain’s privacy program was designed to ensure Outbrain continuously complies with its accountability obligations and is able to demonstrate compliance with the GDPR.

“Lawful Basis” for Processing Personal Data

Pursuant to GDPR, every company must have a “lawful basis” for processing personal data. With respect to the services provided to our Engage publishers/partners, Outbrain is a data controller because Outbrain determines the manner and the purpose for which personal data is processed (see FAQs on page 3 for more detail about Outbrain’s controller status). As has been the case per the EU Directive 95/46/EC (and the e-Privacy Directive, as applicable), publishers must notify readers of (and obtain applicable consent for) dropping cookies (or similar technologies) on the reader. Outbrain’s partnerships have always required that a publisher provide its readers with notice (and applicable consent) for use of Outbrain cookies.

Though Outbrain is a data controller, Outbrain must rely on publisher for its “lawful basis”. There are ongoing conversations around “lawful basis” with respect to digital advertising, specifically whether “legitimate interest” is sufficient or “consent” is necessary. In the meantime, IAB Europe has released its “Transparency & Consent Framework” to support publishers obtaining, storing and passing the consent of readers. Like most of the vendors on a publisher’s pages, Outbrain is not in a position to obtain consent from the readers since Outbrain does not have a direct relationship with the reader. The IAB framework provides a mechanism for a publisher to obtain (and pass) consent for its suite of vendors. Accordingly, Outbrain has endorsed the IAB’s framework as a meaningful step to obtain consent.
Transparency

In parallel, we are increasing transparency in various ways (e.g., labeling of our widget with the AdChoices logo, a data subject portal providing insight into what Outbrain knows about the data subject, revised privacy policy) so that interested readers can easily determine who Outbrain is, what we collect, obtain details of their profile and information on how to achieve erasure.

Our Privacy Program leaders are always happy to have direct conversations with those responsible for privacy in your organization.

How the Outbrain Technology Works

Publishers (or partners) within our network implement Outbrain technology, usually through a piece of java script (but sometimes through an API or SDK) on their site/applications to enable Outbrain to recommend relevant content to publishers' readers.

When a reader, first visits a publisher's website, Outbrain drops cookies (or other tracking technologies) on their device to generate a UUID (Unique User Identifier). The UUID is an alphanumeric sequence that holds no personal identifiable information (such as name or your email address), but is considered “personal data” under the GDPR. This UUID attaches itself to the reader's device and varies depending on which browser and/or device they use. In other words, Outbrain records a different UUID depending on which browser and/or device the reader uses when accessing the Publisher's website.

Using this UUID, Outbrain tracks the content which this UUID is consuming across the Outbrain network of publishers in order to recommend related content to this UUID. The recommendations are based on:

1. the UUID's browsing history (based on similarity in content and categories between stories this UUID is consuming and potential recommendations);
2. co-consumption patterns between this UUID and other UUIDs (i.e., UUID 123 likes to read xyz and that people who like to read xyz also like to read abc).
3. recommendations that are generally popular with Outbrain's audience at this time; and
4. some randomness.

In addition to the above, Outbrain collects user agent data and the IP address, however in line with best practice, Outbrain translates all IP addresses to a geo location and removes the last octet.

As outlined in our Privacy Policy, Outbrain will remove anyone from its personalisation tracking upon request. A link to the Privacy Policy (and green Opt Out button) can be found HERE. Outbrain honors requests to opt out of personalisation tracking through:

- A website, by placing an Outbrain cookie on reader's device that informs Outbrain's servers not to record information about the pages the End User's assigned UUID is visiting.
- An Application, by advising readers to change the settings on their personal device to not pass an Advertiser ID.
# GDPR Data Processing FAQs

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
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<tbody>
<tr>
<td>Why does Outbrain process personal data?</td>
<td>To serve “personalized” recommendations -- both publisher organic recommendations and advertiser recommendations.</td>
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| Is Outbrain a controller or processor?                                   | Outbrain is a controller because  
  • Outbrain decides what information it needs to collect from readers to deliver its recommendations;  
  • Outbrain determines how to collect this information, as well as the techniques used for processing;  
  • Outbrain uses the data it collects to build a reader profile based on interactions across the complete Outbrain publisher network, not just on the publisher’s site;  
  • Outbrain incorporates the data it collects into its own products and services, and does not share or provide that data to the publisher. |
| What personal data is processed?                                          | Outbrain collects IP address and user agent data, and assigns an Outbrain UUID, which uniquely identifies each reader per browser/device engaged on a page on which the Outbrain widget is implemented.  
  The UUID, a sequence of numbers and/or letters, is associated with a reader's device/browser (i.e., Outbrain does not currently hold cross device or cross browser information).  
  The IP address collected is translated to a geo location and then the last octet is removed.  
  In our user profile, we aggregate user interactions (e.g., page views, and clicks) from such browser/device to infer the UUID’s preferences. |
| How does Outbrain collect the personal data?                             | When a reader first visits a publisher’s website on which Outbrain is implemented, Outbrain drops cookies (or other tracking technologies) on their device to generate the UUID (Unique User Identifier described above). |
| Where do we store the personal data?                                     | Outbrain stores its data in three different data centers across the United States, and in some instances on AWS and Google Cloud. |
| How long do we keep personal data?                                       | See Outbrain's cookie glossary for full descriptions, but note that no single piece of data remains in a reader's profile for more than 13 months. |
| Why do we keep the data this long?                                       | In order for Outbrain to serve content recommendations which are relevant to end users’ content consumption online, Outbrain needs to keep a record of the types of pages viewed by readers over a period of time. End users currently “consent” to the Outbrain cookie by seeing/clicking on cookie banners powered by the publishers. (The continuing sufficiency of such cookie banners is in dispute, see page 1 of this document.) The end user can opt out of personalisation at any time by clicking on the Outbrain privacy policy which includes an "opt out". |
| Do you share the data with any other 3rd parties or companies, other than the system the data is stored on? | We do not share end user Outbrain profiles with any third party. |