

House of Commons Business, Innovation & Skills Select Committee Inquiry into The Digital Economy

Written Evidence by the Internet Advertising Bureau UK – October 2015

1. Introduction

1.1 The Internet Advertising Bureau (IAB UK) is the industry body for digital advertising in the UK. It represents over 900 businesses engaged in all forms of online and mobile advertising, including media owners and advertising technology businesses.

1.2 IAB UK's five key objectives are to:

- Prove the value of digital media by delivering 'best in class' industry research and breaking down barriers to advertising spend;
- Enable a trustworthy and responsible medium through cross-industry standards and self-regulation;
- Educate and inspire marketers through intensive learning programmes and thought-leading events;
- Improve ad trading efficiency through measurement guidelines and creative standards; and
- Advocate for an optimum policy and regulatory environment for the market to continue to thrive.

Further information is available at www.iabuk.net.

1.3 IAB UK welcomes the Select Committee's inquiry. **Our written evidence provides an overview of the UK digital advertising market, its role in and contribution to the digital economy, how the various advertising business models work, the different types of approaches or techniques that a marketer may use to advertise a good, product or service, and how data is used to make some of these approaches even more relevant to consumers. It also highlights the challenges – both industry and regulatory – that the sector faces, in particular potentially restrictive new European data protection laws. Our response suggests how the UK Government might address this.**

1.4 **Above all, IAB UK believes consumer trust is key to the success of the digital economy.** The written evidence therefore outlines how industry is developing innovative ways to offer greater transparency and consumer control relating to the collection and use of data for advertising.

1.5 Together with the UK Advertising Association, IAB UK offers the Committee a tour of some 'ad tech' businesses in the UK to provide it with insights into how advertising businesses operating work and their contribution to the digital economy. This was mentioned to the Clerk at a recent meeting in Westminster.

1.6 IAB UK makes the following recommendations to the Select Committee:

- **The Committee, and UK policy-makers in general, should recognise the significant benefits of digital advertising – in helping fund content, services and applications at appropriate cost - to consumers, businesses and the digital economy.**
- **The Committee should encourage the UK Government to specifically look to address the barriers to the effective use of [advertising] data - specifically Europe’s proposed data protection reforms - and suggest ways that these might be minimised in order to realise the benefits.**
- **In its negotiations in Europe on framing a new data protection legal framework, the UK Government should strive to strike a meaningful balance between widely available digital content and services – primarily funded by advertising – and enabling users to safeguard their privacy.**
- **In particular, the potentially more restrictive EU rules for processing data. Applying explicit consent to all types of data processing risks making consent meaningless and fails to increase the level of protection for users whilst at the same time making many existing internet advertising business models unworkable. This will have a significant impact on the UK’s digital economy, for example, by denying revenue to publishers that provide content and services to UK consumers at appropriate cost. It will particularly impact start-ups and small businesses who rely on this revenue to grow and scale up.**
- **The Committee – as well as the UK Government - should support the EU advertising industry’s efforts to provide consumers with greater transparency and control over data to help customise advertising. This seeks to balance the benefits of advertising data to the digital economy whilst empowering European citizens with ways to protect their privacy.**

2. The UK Digital Advertising Market: Benefits

2.1 Advertising – increasingly underpinned by consumer data - plays a significant role in the internet and its development. It is the lifeblood of the digital economy in the UK, EU and globally. As in traditional media, it is the business model for making (non-publicly funded) content widely available to UK citizens for little or no cost. It pays for much of the content and many of the services online: from search, webmail, social networking websites and price comparison sites, to productivity suites, blogs, video/photo sharing and the majority of news, information and video / entertainment sites. The bill that advertisers pick up has a per annum value of £269 per UK internet household¹.

2.2 According to a 2012 report for the Boston Consulting Group, the UK is the world’s leading internet economy with those businesses that engage in online marketing, sales and

¹ 'The Data Deal – How Data Driven Advertising Benefits UK Citizens' – IAB UK, October 2014 www.iabuk.net/about/press/archive/iab-launches-data-deal-report-for-uk-policy-makers

interactions standing to gain the most². Digital advertising - driven by consumer demand for content and services as well as quicker internet speeds - is the fastest growing marketing medium in the UK outstripping all other advertising sectors. The UK leads Europe in digital advertising and no other country in the world has a higher share of its advertising market (39% of a total £18.55bn) than online and mobile does in the UK³. In 2014, £7.12bn was spent on online and mobile advertising in the UK, a like-for-like increase of 14% on 2013⁴. By 2016, Enders Analysis forecast that the UK digital advertising market will represent £9.3 billion of UK advertising spend – 40% of which will be mobile and tablet advertising.

- 2.3 The UK ecommerce market – driven by advertising - contributed £104bn in 2014 to the UK economy⁵. Digital advertising helps power and drive many small businesses, helping them scale up and challenge more established market players. Recent research by the IAB and PwC found that businesses spent £14bn on performance marketing (both affiliate marketing and lead generation – see 5) in 2014. This generated sales of £14bn, the equivalent of £14 for every £1 spent⁶.
- 2.4 Research from Ofcom continually illustrates that the UK consumer benefits from world-leading communications. For example: two-thirds of all adults now claim to own a smartphone (66%) and take-up of tablet computers has shown the largest increase with over half (54%) of households now owning at least one tablet computer, a year-on-year increase of ten percentage points from 2014 to 2015⁷.
- 2.5 The evolution of the internet has enhanced the competition for goods and services, reduced prices and boosted consumer choice within the market place. Advertising has facilitated this, helping drive commerce. The RaceOnline 2012 ‘Manifesto for a Networked Nation’ found that offline households are missing out on an average of £560 savings per year and that everyone should seek to inspire people to get online to reap the significant economic benefits⁸. IAB UK research discovered that six in 10 people online believe they can live more cheaply because of the internet⁹.

3. Education, Media Literacy & Skills

- 3.1 IAB UK believes education is central to better consumer understanding and trust of innovative and evolving advertising techniques (and broader online business models) that aim to provide discounted products, services and applications, and which also underpin high quality content and services. IAB UK has spearheaded education initiatives aiming to achieve this. This includes behavioural or interest-based advertising (www.youronlinechoices.eu/uk) as well as a 2013 campaign to make people aware of a small symbol or ‘AdChoices’ icon in ads to provide greater transparency and control over online advertising preferences (see 7)¹⁰. 26% of Britons are now aware of this privacy icon,

² www.bcg.com/media/PressReleaseDetails.aspx?id=tcm:12-100468

³ www.bcg.com/news/press/1may2015-internet-contributes-10-percent-gdp-uk-economy.aspx

⁴ www.iabuk.net/research/library/2014-full-year-digital-adspend-factsheet

⁴ www.iabuk.net/research/library/2014-full-year-digital-adspend-factsheet

⁵ www.imrg.org

⁶ www.iabuk.net/research/library/uk-online-performance-marketing-consumer-study-2014.

⁷ <http://stakeholders.ofcom.org.uk/market-data-research/market-data/communications-market-reports/cmr15/>

⁸ Manifesto for a Networked Nation July 2010 – RaceOnline2012

⁹ www.iabuk.net/about/press/archive/consumers-say-the-internet-would-disappear-without-ads

¹⁰ www.iabuk.net/about/press/archive/consumers-gain-greater-control-over-targeted-online-ads

doubling over the last two years¹¹. Further research on awareness of the icon across EU markets will be available in December 2015.

- 3.2 Over the years, the UK advertising sector has promoted media literacy via [MediaSmart](#). MediaSmart is a not-for-profit company that creates free educational materials for schools and youth clubs, and for teachers and guardians, to help young people think critically about the advertising that they come across in their daily lives. IAB UK is a supporter of MediaSmart and in 2015 helped it to develop and launch [new lesson plans](#) in social media advertising. The resource aims to encourage students to think about the type of social media available to them; the advertising that they are exposed to on these sites and how to manage it; their relationship with social media sites, their sponsors and brand advertisers; and the business models that allow them to access a whole range of services at little or no cost.
- 3.3 IAB UK also believes that digital skills are also essential to the success of the UK digital economy. Recent research by digital skills charity, Go.On UK, recently found that 12m people and 1m small businesses do not have the skills to prosper in the digital era¹².

4. Digital Advertising: How does it all work?

- 4.1 The internet and digital platforms (including mobile and other connected devices) offer advertisers a wide range of different approaches to market their products and services. In terms of advertising spend the three main approaches are: 'search' (eg via a search engine such as Google or Bing); 'display' (eg ads that you see on a website) and 'classified' (ie similar to the listings in a newspaper).
- 4.2 Advertising on digital platforms today is targeted to reach the right audience and to maximise the return on the marketer's investment. Primarily this has five main forms:
- a. **Contextual advertising:** This is where advertisements are served within a chosen 'context' by the selection of a website (eg a banner ad) or search engine query on a particular topic and therefore assumed interest. An example: a user is shown an advertisement for lawnmowers because he or she is visiting a gardening-related website. No user data, personally identifiable or otherwise, is collected from the consumer or used in order to deliver this type of advertising. The relevant information is taken from keywords identified in the context by the context creator (ie user).
 - b. **Demographic advertising:** This is where advertisements are served based upon specific information provided by the user (ie gender, age, location). An example: a teacher living in London who has registered on a jobs website is shown advertisements for teaching opportunities in London on the website but not necessarily in the teaching section. It is worth noting that some information provided by the user may be segregated, retained and used without being able to identify (and associate with) an individual.
 - c. **Content marketing:** Often called 'native' advertising, this can take many different forms. In essence, this is advertising that fits neatly within the surrounding look and feel of the site or app. This is often content-based and is therefore more relevant to the user.

¹¹ www.iabuk.net/about/press/archive/new-research-shows-growth-of-eu-industry-initiative-to-give-consumers

¹² <http://www.bbc.co.uk/news/technology-34570344>

However, this type of marketing needs to be clear and transparent and the IAB has recently published market guidance to help businesses assist consumers in spotting this to comply with the law and the Committee for Advertising Practice (CAP Code)¹³. Native and content advertising spend – including paid for sponsorships, advertisement features and ‘in-feed’ distribution – was £2.27m in 2014, accounting for one fifth of digital display ad spend¹⁴.

- d. **Behavioural advertising (also known as interest-based advertising):** This identifies large groups of users with similar interests based upon shared attributes, such as previous web browsing activity over multiple sites in order to provide more relevant advertisements. This type of advertising operates without data being collected that directly identifies a user, rather by using device identifiers such as cookies. An example: a user’s device is served with advertisements about golf equipment because the user has – over a period of time – visited different golf websites. An example of how this works is shown at www.youronlinechoices.com/uk/about-behavioural-advertising. The underlying business model and technology for this type of advertising can vary but they are most commonly browser-based and infer a user’s interests from ads clicked on, content viewed and searches made.
 - e. **Retargeting:** This is where a specific user interest is derived from their interaction with a single site and adverts relating to the content viewed are served to the same device when a user visits other websites on that device. Thus the user is ‘retargeted’ on other websites and this allows the creative to be dynamic and more personalised. Like behavioural advertising, the adverts are served in real-time using intermediaries operating under contract to the advertiser / agency. For example: a user is offered a discount deal on a pair of shoes on a separate site following their visit to the site displaying the viewed shoes.
- 4.3 Dynamic advertising creative combined with automated trading of inventory (known as ‘programmatic trading’) now enables customised advertising to be selected and delivered in real-time. In 2014, 45% of all digital display advertising was traded programmatically¹⁵.
 - 4.4 The digital display advertising value chain is a complex one with many different players. Very simply it can be separated into a ‘buy’ (ie the advertiser) and ‘sell’ (ie the web publisher / app provider) side. Advertising intermediaries broker or facilitate the selling of media and operate under contract to the advertiser / agency.
 - 4.5 In terms of the legal framework and regulatory oversight, the activities of behavioural advertising and retargeting involve the collection and use of data – some of which may include personal data - and as such may be subject to the UK Data Protection Act 1998 (as well as the recently revised Privacy and Electronic Communications Regulations 2011) and are regulated by the Information Commissioner’s Office (ICO). In addition, the industry has developed EU-wide good practice to provide greater transparency and user choice and control (see 7).

¹³ www.iabuk.net/about/press/archive/iab-launches-guidelines-to-provide-greater-transparency-in-native-digital

www.iabuk.net/resources/standards-and-guidelines/content-and-native-disclosure-guidelines-phase-2.

¹⁴ www.iabuk.net/research/library/2014-full-year-digital-adspend-factsheet.

¹⁵ www.iabuk.net/research/library/media-owner-sales-techniques-2014-most.

4.6 Some businesses offer many of the below services but – in a nutshell - the following business models make up the display advertising value chain:

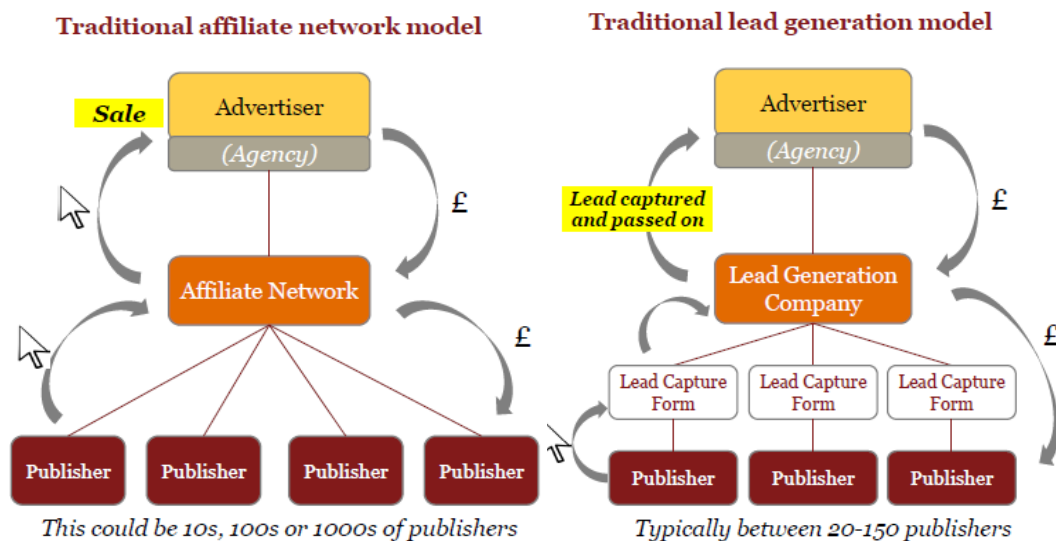
- **Advertiser** – a company or brand that sells a product or service and runs advertising campaigns to promote that product or service. The advertiser is ultimately responsible for the creative messaging and deciding which creative is served to which user / group of users. The advertiser also contracts (sometimes via an agency) with intermediaries to buy inventory.
- **Advertising Agency** – a company that works with advertisers to create campaigns to promote that advertiser's product or service. This includes a creative agency that develops the creative messaging, campaign concept, branding, and look and feel of the campaign.
- **Advertising Agency Trading Desk** – a team within an advertising agency that works with a Demand Side Platform (see below) technology to buy inventory for campaigns. Independent Trading Desks also exist.
- **Demand Side Platform** – a technology company that provides a centralised platform for advertisers to buy inventory from multiple advertising exchanges (see below). This technology may be integrated within the Trading Desk itself.
- **Advertising Network** – a technology company that aggregates the supply of, and sells, ad inventory to advertisers / agencies on multiple websites.
- **Advertising Exchange** – a technology company that acts as an open market place for the selling of advertising inventory. Sometimes these will be private (also known as a 'private advertising marketplace') with a group of select advertisers and agencies.
- **Data Management Platform (DMP)** – a company that pulls together information from multiple sources and builds user 'segments' based on interests (eg car buyers).
- **Sell Side Platform** – a technology company that works with publishers / app providers to help maximise the money received from selling advertising on the publisher's site.
- **Web Publisher / App Provider** – a company that owns and operates its own digital property (website, app) and, in this context, sells advertising on the property as a revenue stream.

4.7 The IAB has produced a short video to help explain how the display advertising market operates, including how information is traded and exchanged. This is available at: www.iabuk.net/video/the-evolution-of-online-display-advertising.

5. Digital Advertising: How does it all work? Performance Marketing

5.1 A form of digital marketing that differs from traditional 'display' advertising is **performance marketing**. This is because it is paid for by outcomes (eg a consumer initiated outcome such as a purchase). There are two principal forms of performance marketing:

- a. **Affiliate Marketing** (see below): This is where a consumer who, when clicking on an advertisement, is redirected to the advertiser's website to complete the transaction, following which a fee is paid to the content owners once the transaction is completed.
- b. **Lead Generation** (see below): Having entered various details into a form, a consumer's details are then passed onto the advertiser following which a fee is paid to the content owners (payment is on a per enquiry basis).



5.2 There are varying types of affiliate business models. Each of these will be run in a slightly different way but they all have one thing in common in that they are paid small commissions by advertisers for referring customers to them. The most common type of ‘affiliate publishers’ are: **cashback, loyalty and reward sites; voucher code or offer sites, blogger or editorial sites, and price comparison sites.**

a. Cashback, loyalty and reward websites:

Loyalty shopping schemes have existed in the ‘offline’ world for decades and now exist on digital platforms. Many publisher sites offering loyalty schemes use performance marketing techniques and particularly affiliate programmes to feature retailers, or advertisers, who pass on a cash or points reward to consumers in return for shopping with them. Examples include Nectar and Avios.

b. Voucher code and offer sites:

As in the offline world (such as with restaurant voucher codes), many consumers will use voucher or discount codes to save money when online shopping. Websites will work with retailers to feature offers and some may be exclusive deals only available on that site. Some (though probably not all) of the links will result in the publisher website earning a small commission for the sales that result from the listed offers. Voucher code and offer sites include www.quido.com, www.savoo.co.uk, www.vouchercodes.com and www.hotukdeals.com.

c. Blogger and editorial sites:

Many people today create their own websites or apps so they can share their interests, passions and views with a wider audience. These might be run by one person who updates the content in their spare time. Alternatively the websites might be run as professional businesses with full time employees – they may even be well-known news brands. Either way many of the links might earn the sites commissions when products they feature are bought from the listed retailers.

d. Price and product comparison sites:

Often people want to compare products they're interested in buying to find the full range of retailers selling those items and the prices they're charging. Some of these comparison sites will use affiliate links to monitor the sales they generate and will then be rewarded by the retailer with a commission for these sales. Examples of well-known sites are www.Uswitch.com and www.moneysupermarket.com.

5.3 The IAB has produced a new site to help explain how this all works. This can be found at www.iab-performance-marketing-explained.net.

6. Tackling Advertising Industry Threats to the Digital Economy: Ad Blocking

6.1 Digital advertising takes advantage of disruptive technology to innovate and grow. One of the growing threats to the current model of ad-funded digital content and services comes in the form of another disruptive technology: ad-blocking.

6.2 An ad blocker is a piece of software that usually comes as a browser extension or an app that can be downloaded in order to remove some adverts. People choose to use them for a variety of reasons, but mainly because they feel their online experience is interrupted by ads that blink, flash, potentially slow page load times or add to the cost of a mobile data plan.

6.3 Ad blockers use what are effectively pre-determined 'blacklists' to identify which types of ads are blocked and which publishers are affected. The layout of a web page looks largely unaltered once the advertising is removed. It does not leave gaps where the advertising should have been displayed.

6.4 As outlined in section 2, IAB UK believes in an ad-funded internet and works to support a thriving digital advertising market, which in turn makes a significant contribution to the UK's digital economy. While IAB UK supports consumer choice and understand people's desire to block ads that disrupt their online experience, ad blocking prevents brands and publishers from reaching their audiences with effective and relevant communications and content. Without advertising, digital content and services may disappear or consumers may have to pay for content – such as news and entertainment – that they currently receive for little or no cost. Our research (available on request) has found that more than half of web users in the UK do not understand that being exposed to advertising online allows them to enjoy content and services at little or no cost or that blocking ads means that websites could lose revenue.

6.5 IAB UK also believes that the most appropriate response to the ad blocking issue in the current environment is an industry-led and global response that acknowledges the reasons why people choose to block ads. IAB UK does not believe, at this stage, that any regulatory intervention is warranted. The digital advertising industry must improve user experience to more closely align people's expectations with the digital advertising formats that fuel content and services, and work to help consumers understand of how advertising funds content and services.

6.6 To this extent, and with other IABs across the world, we are:

- Developing new industry standards for ‘leaner’ ads that give people a better user experience online, continuing to have constructive dialogue with ad blocking companies as we do so;
- Providing consumer-facing educational resources and recommended consumer-friendly language for notices to be shown when a person with an ad-blocker visits a website; and
- Working to raise the profile of the ‘value exchange’ between digital advertising and ad-funded content and services.

7. Addressing Privacy Concerns: Greater Transparency and Control

7.1 IAB UK acknowledges that the collection and use of consumer data (such as web browsing and other information) could potentially raise issues relating to consumer privacy. In April 2011, building on an US initiative and the development of good practice in the UK, EU advertising and media trade bodies published good practice for all EU and EEA markets to enhance transparency and user control for online behavioural advertising.

7.2 The initiative is based upon seven key principles:

- i. **Notice:** Transparency about data collection and use practices associated with behavioural advertising, providing consumers with clear, prominent and contextual notice through multiple mechanisms, including an icon in or around advertisements linked to further information and control mechanisms.
- ii. **User choice:** Greater consumer control over behavioural advertising. For example, via www.youronlinechoices.eu.
- iii. **Data security:** Appropriate data security and retention of data collected and used for behavioural advertising purposes.
- iv. **Sensitive segmentation:** Limitations on the creation of 'interest segments' to specifically target children and on the collection of sensitive personal data collected and used for behavioural advertising.
- v. **Education:** For consumers and businesses about behavioural advertising and the self-regulatory Framework.
- vi. **Compliance and enforcement:** Mechanisms to ensure the effectiveness of the Framework, including a trading seal to be granted to compliant businesses once independently audited and which demonstrates to other businesses that the holder adheres to the obligations under the Framework.
- vii. **Review:** Regular review of the Framework to ensure it evolves with developing technology and business practices. For example, EU advertising and media bodies are currently working on adapting the existing principles to the mobile environment.

A copy of the EU industry Framework can be found at: <http://edaa.eu/european-principles/>.

7.3 At the heart of this work is a symbol or icon (see below – often known as the ‘AdChoices’ icon) that appears in or around the advertisements on sites, as well as on site pages themselves. When a user clicks on the icon he or she will be able to find out more about the

information collected and used for this purpose. In 2014, 160bn icons were delivered by approved providers across Europe. One trillion icons were delivered globally in 2014, giving consumers significant opportunities to manage or control their online advertising preferences.



- 7.4 The icon also links to ways for internet users to manage their interests, such as via privacy dashboards or ad preference managers. It will also link to a pan-European website now available in 33 different EU languages – www.youronlinechoices.eu – with helpful advice, tips to help protect privacy and a control page where you can turn off behavioural advertising. There are nearly two million unique visitors to www.youronlinechoices.eu every month. The UK version of the website is at www.youronlinechoices.eu/uk. Further information on the initiative is available at www.iabuk.net/policy/briefings/updated-iab-factsheet-may-2014-online-behavioural-advertising.
- 7.5 Several campaigns – including in the UK, Ireland, Germany, France, Greece, Portugal, Bulgaria and Sweden - have sought to raise awareness of the icon. Recent research by the EDAA and privacy solutions provider, TRUSTe, suggests that awareness of privacy tools is on the increase. For example, one in 25 European citizens have visited www.youronlinechoices.eu to find out more about how online ads are targeted to interests¹⁶.
- 7.6 The EU industry initiative is administered by the European Interactive Digital Advertising Alliance (EDAA) www.edaa.eu. The EU advertising industry will announce how it is adapting these principles for the mobile environment on 1 December 2015
- 8. Agreeing Proportionate New European Data Protection Law**
- 8.1 The IAB supports the need to update data protection law in light of the technological changes since 1995 to provide European citizens with a strong level of protection and accountability, and welcomes streamlining the rules to make them more efficient for businesses operating across multiple territories.
- 8.2 However, there are two key aspects of the draft EU Data Protection Regulation – still unresolved in ongoing discussions - that pose a genuine threat to the future of digital advertising businesses:
- i. **The extended scope of ‘personal data’.** This would, in effect, cover almost every piece of data that is collected and processed in a digital environment. This binary approach

¹⁶ www.edaa.eu/edaa-news/new-research-shows-foundations-for-growth-of-european-industry-initiative-that-gives-consumers-transparency-control-over-advertising-choices.

applies regardless of whether the data collected is personally sensitive, identifies you as a person or is aggregated to help improve or tailor content or services to the consumer.

- ii. **The proposed requirement to obtain explicit consent for the processing of personal data.** Were this to be the only legal basis available to digital businesses it would require consumers to navigate through numerous ‘hoops’ to reach the service or content that they wish to access or view.

- 8.3 A combination of these two requirements would have significant effects on the digital advertising industry as well as the UK digital economy. It is generally accepted that data that singles out but does not identify a user (as is used in digital advertising) enhances privacy. Data controllers have to invest in order to collect and process data in this way and create additional privacy safeguards (for example, minimising the amount of data processed). By having a single definition of personal data the draft Regulation treats all data the same way and does not create incentives to invest in privacy enhancing measures.
- 8.4 Where digital advertising players act as third parties and have no relationship with the end user (and so cannot practically obtain consent), explicit consent would not be a workable legal basis to ensure the long- term scalability and viability of their business models in Europe. For those with a more direct relationship with the end-user, this requirement would most likely result in a more ‘logged-in’ digital environment (ie requiring users to register and log-in to access a site / app). This would cause a fundamental shift away from how the digital ecosystem operates today.
- 8.5 Applying explicit consent to all types of data processing fails to follow a risk-based approach. Treating the most sensitive of data exactly the same way as non-sensitive data does not increase the level of protection for users and actually disrupts the user experience. For example: users would face multiple requests for consent and could get in the habit of consenting without consideration which would result in explicit but meaningless consent. Indeed, requiring explicit consent creates an economic incentive for collecting more data by forcing log-ins to prove compliance with the requirement, effectively achieving the opposite of what the proposed regulation seeks to do.
- 8.6 The proposed reforms therefore take a blanket approach to regulating data that would create significant legal uncertainty for many internet business models. They would pose a significant barrier to any business that relies on the analysis of sets of data, rendering them unworkable and, at worst, illegal. Today’s advertising models would be severely impacted, depriving many web publishers and small businesses of much needed revenue, as well as compromising the development of future business models.
- 8.7 The proposed legislation is expected to be concluded in late 2015 / early 2016. However, the UK Government needs to continue its work in the implementation of the Regulation – particularly where requirements may be delegated to Member States – to ensure the availability of practical guidance for businesses.

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