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## 1: Introduction (i)

Many advertisers embed tags or code from third-party advertising services, such as Google's, to facilitate services like ad measurement and remarketing.

These tags allow data to be shared among advertising service providers. Due to recent GDPR legislation, we must make you aware of your legal obligations in having Google pixels on your site.

You can find more information regarding GDPR here:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

## 1: Introduction (ii)

To help with this we have compiled an Advertiser Pack which aims to help you understand the following:

- What pixels are, why they were provided and what they mean to your users
- What your requirements are under GDPR legislation
- Your privacy/cookie policy
- How you can send us a notification for those users that wish to opt out of consent.

*Please note that this information is purely advisory. Although we believe it is in our best interest as advertising partners to help you to ensure you are compliant, we are not responsible in law for your compliance in full or in part.*

## 2: Pixels (i)

### What is a pixel and what does it do?

When you booked a digital campaign, your sales representative may have provided a small piece of code in a text file for you to add to your website. This is the pixel. This pixel would have been created in a Google Ad Manager platform.

This could be for one or more of the following reasons:

- To track the number of users visiting your website as a direct influence of the digital campaign you bought. Eg: A user saw the advert, then later visited your website independently.
- To track the number of users who visited a specific section of your website as a direct influence of the digital campaign you bought. Eg: A user saw your advert, clicked on the advert then visited the specific section or filled in a registration form of your choice.
- To retarget users who have visited your website and show them your digital adverts when they visit other websites on the internet.

### How does Newsquest use this data?

This data is only used to measure the performance of your digital campaign or to display your advert to one of your users. We do not share this data with any other advertiser but may use it to benchmark and analyse the success of our campaigns etc.

Further information around the use of pixels, data, privacy and cookies can be found here

<http://www.newsquest.co.uk/standard-data-processing-addendum/>

<http://www.newsquest.co.uk/cookie-policy/>

<http://www.newsquest.co.uk/privacy-policy/>

## 2: Pixels (ii)

### How was the pixel added to my website?

There are a few ways the pixel could have been implemented, including, but not limited to, the following:

You may have been supplied with the pixels by Newsquest which you implemented onto all pages or specific pages on your website.

You may have been supplied with a Google Tag Manager Tag (GTM) which you implemented onto all pages or specific pages on your website whereby Newsquest managed the placement of the pixels.

You may have your own Google Tag Manager Tag (GTM) to which you gave Newsquest access, so we could place the pixels on your behalf.

### What has this got to do with GDPR legislation?

Due to the functions that these pixels perform, they collect and store data. Under the current IAB (Interactive Advertising Bureau) framework, these pixels can be defined as the following:

#### **Information storage and access**

The storage of information, or access to information that is already stored, on your device such as advertising identifiers, device identifiers, cookies, and similar technologies

#### **Personalisation (for remarketing only)**

The collection and processing of information about your use of this service to subsequently personalise advertising and/or content for you in other contexts, such as on other websites or apps, over time.

Typically, the content of the site or app is used to make inferences about your interests, which inform future selection of advertising and/or content

## 2: Pixels (iii)

### Measurement

The collection of information about your use of the content, and combination with previously collected information, used to measure, understand, and report on your usage of the service. This does not include personalisation, the collection of information about your use of this service to subsequently personalise content and/or advertising for you in other contexts, i.e. on other service, such as websites or apps, over time

As detailed in our advertising terms, it will be necessary for you to obtain consent from your users under GDPR legislation when they visit your website. As joint controllers of this data, Newsquest will presume you have obtained your user's consent, unless you indicate to us otherwise via passing a signal (see section 4).

To read our Advertising Terms, click here:

<http://www.newsquest.co.uk/terms-of-advertising/>

## 3: Advertiser requirements around consent (i)

### How do I obtain user consent?

You may require a Consent Management Platform (CMP). We cannot tell you which CMP you should use or what the consent banner on your site should say.

As all our pixels are Google pixels, we recommend that you read Google's advice guide.

This can be found here: <http://www.cookiechoices.org/>

### This page outlines the following:

- CMP options
- Links to further information on EU User consent policy
- Advice specifically for Advertisers
- Other helpful resources



## 3: Advertiser requirements around consent (ii)

How do I pass the signal on for users that have opted out to Newsquest?

There are a few ways you can send that signal to us. You may require a web developer to help you implement these options.

### Option 1: Data Layers

If your pixel is implemented via a Google Tag Manager Tag (GTM), either your own or Newsquest's, then you can create a data layer on your site that passes the consent to the GTM.

Eg:

```
<script>
  dataLayer = [{
    'nq_pixel_consent': 'no',
  }];
</script>
```

If the condition “no” is sent, the pixel will not fire. If you own your GTM then you must set up this condition within the tag unless you have given Newsquest access to manage the pixels. If Newsquest own the GTM we will set up the condition.

For more details on Data Layers, see: <https://developers.google.com/tag-manager/devguide>

### Option 2: Cookie

You create a cookie named “nq\_pixel\_consent” with a value of “no”. As with Option 1, this would be used for the condition to fire the pixel.

If you own your GTM then you must set up this condition within the tag unless you have given Newsquest access to manage the pixels. If Newsquest own the GTM we will set up the condition.

### Option 3: Direct on the page

If your pixels were implemented directly onto the webpage and not via GTM then you must have the relevant code on your site to prevent the tag from firing if consent was not given via your CMP.

## 4: Updating your Privacy Policy

As before, we cannot tell you what to write on your privacy and cookie policy pages. You must ensure that your privacy policy explains the user of all pixels on your site.

If you are using pixels for remarketing, then this page by Google will explain what you will need to write

<https://support.google.com/adwords/answer/2549063?hl=en-GB>

It also provides opt-out page details.

## 5: Useful links

EU GDPR Information Portal:

<https://www.eugdpr.org/>

UK Gov Guide to GDPR:

<https://www.gov.uk/government/publications/guide-to-the-general-data-protection-regulation>

ICO Guide to GDPR

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

Google's Help for Publishers and Advertisers with Consent:

<https://www.cookiechoices.org/>

Google's Help with EU user consent policy:

<https://www.google.com/about/company/user-consent-policy-help.html>

Google Tag Manager – Developer Guide on Data Layers:

<https://developers.google.com/tag-manager/devguide>

Google Advice on what to include in your privacy policy for remarketing

<https://support.google.com/adwords/answer/2549063?hl=en-GB>

Newsquest Terms of advertising

<http://www.newsquest.co.uk/terms-of-advertising>