

Data Privacy Audit

"Not everything that counts can be counted, and not everything that can be counted counts."

Sign hanging in Einstein's office at Princeton

Where are my cookies?

By the 25th May 2011, the UK will have updated its e-privacy laws to comply with the October 2009 amendment to the European E-Privacy Directive, which covers data protection and privacy in the digital age. This update includes:

- Mandatory notification for personal data breaches
- New regulations on cookies (all users must have given consent before a cookie can be stored on their computer)
- Enhancement of the right of actions against spam
- Clarification of the scope of the e-privacy Directive;



UK businesses and other organisations will need to obtain consent from visitors to their websites in order to store on and retrieve usage information from users' computers. This will have an operational impact on any company that uses cookies and collects personal data across its digital properties, in particular ISPs, telcos and online advertisers who rely on 3rd party cookies for targeting

Why does it matter?

Data Privacy is all about trust, which participates in the creation of a good user experience. It has regularly surfaced in the past decade as a consumer issue: with the increased access to technology, the appearance of geolocation tagging and social media sites such as Facebook or Foursquare, the trend has become more noticeable. In this environment, and in the light of the new legislation, and it is now also a legal issue: it matters what you collect and what you do with it, since companies not complying with the new rules may face **penalties of up to £500,000** imposed by the UK's Information Commission Organisation .

To help companies plan implementation while maintaining a great user experience and keeping their users' trust, Foviance has developed a "Cookie recipe" - a Data Privacy Audit. This audit will enable you to tell users exactly what cookies you use - not only best practice in terms of this legislation, but also socially responsible. Being transparent in this area also helps develop users' trust in your brands.

Data Privacy Audit Process

The process starts with requirements analysis through meetings with stakeholders, and a review of the new legislation requirements in light of these.

Broadly speaking, there are 4 categories of cookies (1st and 3rd party):

- Marketing related
- Advertising related cookies
- Analytics or tracking related
- Application or site specific cookies.

Foviance will review the current policies for obtaining consent across the digital properties for the various types of cookies, and assess technologies used for collection and storage in order to assess risk of data breach.

Cookie information is then extracted and entered in a database for an audit, analysis and rating of the use of cookies across client's media properties. To ensure thoroughness of the audit, Foviance develops a tailored, automated tool to aid the tracking of actual cookie usage across all sites, also recording the type of data currently being captured. Foviance can analyse cookie collection across flash media, checkout process, emails, banner ads, and so on.

The following are the deliverables for a Foviance cookie audit:

- Cookie usage audit report
- Advice on compliance with the new rules
- Roadmap for managing cookie processes
- Assistance with implementation



Next steps

Please contact us to discuss how Foviance can help you make sure you know where your cookies are on: 0845 054 6500, or send us an email: info@foviance.com

About Foviance

Foviance is a cross-channel customer experience consultancy to the world's leading brands. We help clients drive business performance through better:

- Customer relationships
- Marketing effectiveness
- Use of technology
- Customer focussed culture



We use our proprietary Foviance Framework© to help clients understand, define, assess and make improvements to their customer experience.
