

Customer trust and first-party data: The keys to succeed in APAC's new privacy era

Lessons from conversations with leading publishers
and app developers across the region



Executive Summary

Introduction

This report, based on interviews with and a survey of publishers and app developers (the “**sell-side**”) across APAC, builds on similar research in [Europe](#) and the [Americas](#) and aims to provide a qualitative summary of:

- 01** The **privacy state of play** across the APAC advertising ecosystem and the sell-side perspectives on it.
- 02** An articulation of the **implications** of existing and upcoming privacy changes for sell-side players.
- 03** **Tangible steps** which sell-side players can draw inspiration from as they face a more privacy-centric future.

Research highlights


- 14** **markets** covered across APAC, including 72 interviews and 88 survey respondents
- 65%** of respondents expect **advertising revenues to fall** due to the rise of privacy
- 73%** of respondents believe that **using first-party data would mitigate** the impact of the rise of privacy

Key findings

- 01 Lower focus on privacy in APAC**
Despite strong support for recent privacy changes, privacy is yet to become as much of a focus for sell-side players in APAC as it is in Europe or the Americas. This is due to both the nature of the APAC market (e.g., a predominantly mobile market forecast to grow faster than global average with resilient traditional media), and the fact that privacy impacts sell-side players very differently across the region.
- 02 Differing approaches to privacy**
Sell-side players are responding to the rise of privacy in starkly different ways, depending on their appetite to invest ahead of the market, as well as their ability and willingness to embrace first-party data-based solutions.
- 03 Though market leaders are seeking to differentiate through trust and first-party data, the relative lack of action remains a source of concern**
Given the wide-ranging impact that privacy can have on all sell-side growth levers, the relative lack of action across APAC remains worrying. Nevertheless, it is encouraging to see market leaders aiming to build significant competitive advantage in the age of privacy by focusing on customer trust and first-party data.
- 04 The time is now**
It is not too late to take action, and a growing number of solutions are readily available. However, given the journey towards privacy readiness can take years, there is not a moment to waste.

Recommendations

The awareness of the impact of the rise of privacy is leading sell-side players to take a broad range of actions, which our report aims to summarize.

-  **Setting up for first-party data success**
First-party data is expected to be a core source of competitive advantage in a more privacy-centric ad sales ecosystem. Focusing on collecting, storing, analyzing and leveraging it is key to privacy readiness (*Chapter 2*).
-  **Connecting to advertisers and agencies**
The withdrawal of support for third-party cookies will require that you choose a different way to connect to advertisers and agencies (the “**buy-side**”) in line with your context, strategy and view of privacy (*Chapter 3*).
-  **Winning through first-party data**
Success in a more privacy-centric ad sales ecosystem will require that you lean into difficult trade-offs around investment timing and data strategy (*Chapter 4*).
-  **Making progress on your privacy journey**
Leveraging existing and new partners, do not delay starting your privacy journey (*Chapter 5*).



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Chapter 01

Privacy state of play across APAC and its implications for publishers and app developers

Chapter 02

Setting up for first-party data success

Chapter 03

Connecting to the buy-side

Chapter 04

Winning through first-party data

Chapter 05

Making progress on your privacy journey:
The time is now



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Chapter 01

Privacy state of play across APAC and its implications for publishers and app developers



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The evolving privacy landscape across APAC

“Today, more than ever, organizations need to keep up-to-date with the diverse privacy regulatory landscape in order to minimize privacy risk, maintain and build trust with customers, and create sustainable and productive business networks.”

(Deloitte Asia Pacific Privacy Guide 2019)

Over the past five years, the Asia Pacific (APAC) region has witnessed a steady increase in its focus on privacy in the form of increasing regulatory intervention, changes to platform policy and an increase in customer concern over how data is used online.

This increased focus on privacy is already having a profound impact on the way advertising is bought and sold throughout the region, affecting every aspect of publisher and app developer business and operating models.

The Advertising Marketplace comprises of:




Sell-side All companies that sell advertising solutions. For the purposes of this research, this includes broadcasters, publishers and app developers.

Buy-side Brands and their agencies that advertise their products and services through advertising solutions provided by the sell-side.

Building on the 2019 [Global Data Maturity Report](#) and research on sell-side responses to the rise of privacy in [Europe](#) and [the Americas](#) in 2021, this report, based on over 70 interviews and a survey of close to 90 publishers and app developers that work with either Google or Deloitte, aims to:

- Summarize the privacy state of play across APAC and how it is perceived by publishers, broadcasters and app developers (together “the sell-side” or “sell-side players”)
- Articulate the implications of existing and upcoming privacy changes for these players
- Lay out key, tangible steps, backed by real life examples, which sell-side players can draw inspiration from as they face a more privacy-centric future

Given its qualitative nature, this report, including the statistics and quotes provided therein, aims to capture the essence of our findings rather than any statistically significant approximation of market reality.

<p>Customer Concern</p> 	<p>Rising concerns over privacy, mainly among customers with higher digital sophistication in large metropolitan centres, have contributed to the increased focus on privacy across the wider ecosystem.</p>
<p>Regulatory Intervention</p> 	<p>In response to customer concern and in line with their counterparts around the globe, regulators across the region have both introduced new privacy regulation and amended existing privacy laws over the past few years.</p> <p>Their intervention has mainly focused on defining what constitutes personal information, defining customers’ rights when it comes to managing their privacy, and setting clearer guidelines for how personal data should be captured, stored and shared.</p>
<p>Platform Policies</p> 	<p>Changes implemented at the global level by major browsers and app operating systems, such as the withdrawal of support for third-party cookies, easy-to-use interfaces asking users to opt in to data sharing and changes to mobile AdIDs, have put constraints on the way publishers and app developers collect and use user data.</p>



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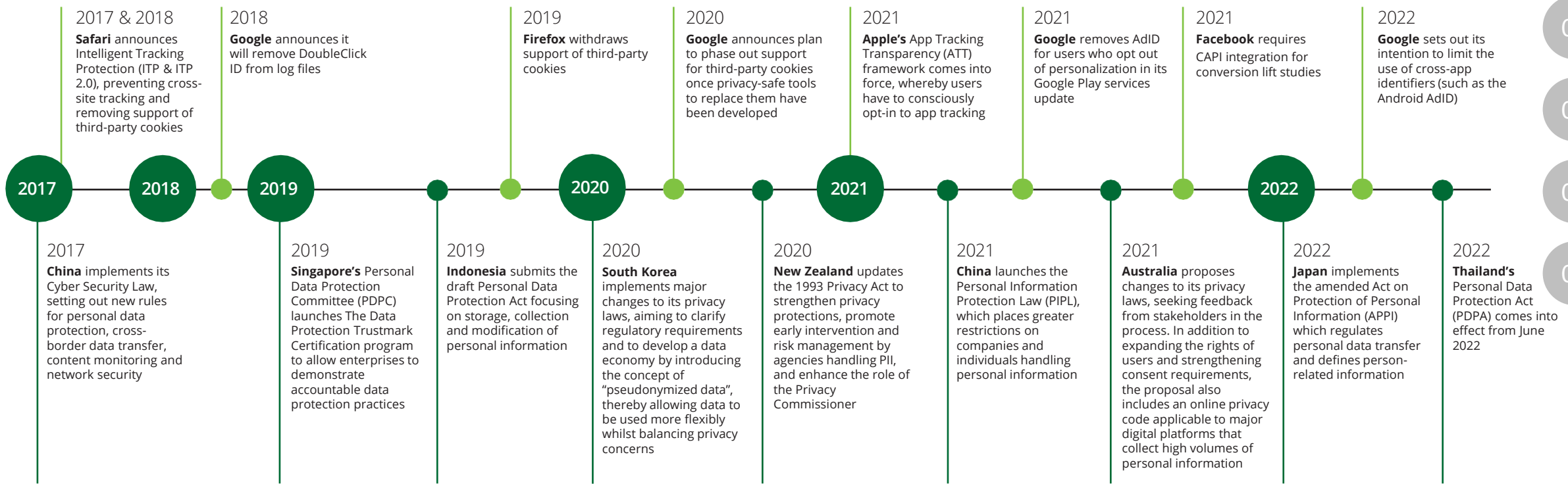
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The evolving privacy landscape across APAC

The past five years have seen a steady increase in regulatory and platform focus across APAC. Though in some cases not going as far as the General Data Protection Regulation (GDPR) in Europe and the California Consumer Privacy Act (CCPA) in the United States, regulation now covers a significant percentage of the APAC population, with more platform and regulatory developments set to take place over the coming months and years.



10 of the 14 markets we surveyed have issued privacy regulation



■ Regulation changes ■ Platform changes

This timeline features select recent developments in various APAC markets. For a comprehensive list of privacy regulations in APAC, please refer to the [Deloitte Asia Pacific Privacy Guide 2020-2021](#).

An asymmetric impact

Various paths towards privacy regulation

The growth in regulatory intervention highlighted in the previous page hides significant differences across markets in terms of their regulatory maturity to date:



Mature privacy regulation

Australia, Japan, New Zealand, Singapore and South Korea



Evolving privacy regulation

China, Hong Kong, Taiwan, Thailand and Malaysia



Emerging privacy regulation¹

India, Indonesia, Pakistan and Vietnam

¹Privacy considerations embedded in broader legislation

Multiple factors sharpening contrasts across APAC

Beyond regulation, two factors are impacting the extent to which sell-side players are having to evolve their data and advertising strategies in response to the rise of privacy:



Platform penetration

Market share of browsers that have withdrawn their support of third-party cookies or app operating systems that ask users to opt in to data collection

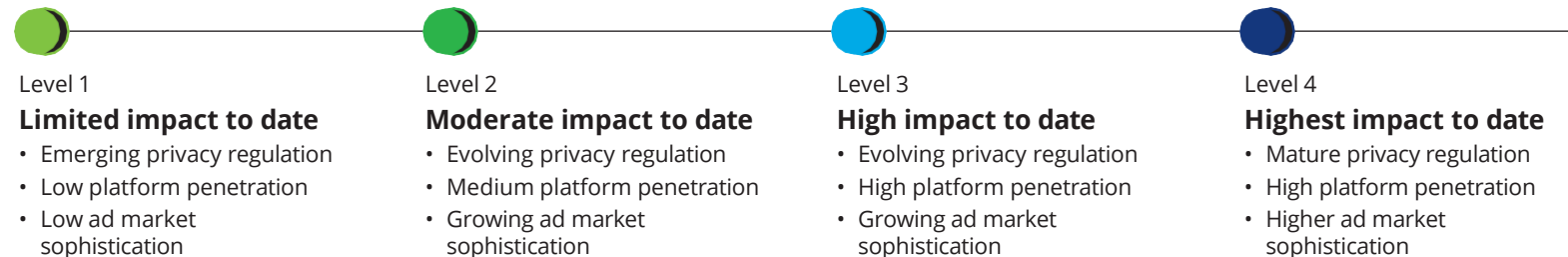


Ad market sophistication

The share of advertising revenues reliant on data-based audience matching

Market penetration of these browsers and app operating systems increases the degree to which a publisher or broadcaster needs to source first-party data to fuel growth. Meanwhile, the reliance on audience matching drives the degree to which advertising revenues are impacted, positively or negatively, by a player's ability to source the data required to deliver audience-based advertising solutions.

The prevalence of these two factors varies greatly across markets. Along with differences in regulatory regimes, this reality is leading privacy to impact sell-side players in widely asymmetric ways across the APAC ad sales ecosystem:



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Trailing Europe and the Americas

Despite these differences across the region, on average, **privacy is yet to become as much of a focus in the APAC advertising ecosystem as it is in Europe or the Americas.**

A wide range of factors contributes to this state of affairs, much of which is rooted in a fundamentally different market reality.

“Privacy isn’t very clear to many businesses, which are sometimes crossing the line without even being aware that they are doing it.”

Large Southeast Asian publisher

Digital Ad Spend ¹	APAC	Global
As a % of total	47%	61%
2021-26 CAGR	13%	8%
Mobile share of traffic	>65%	57%

What makes the APAC digital advertising landscape different?

Key underlying reasons:

- 1 Contrary to GDPR, which is set at the regional level, privacy regulation is set at national levels leading to significant differences across the region
- 2 Lower customer awareness over online data collection along with high willingness to share data for better UX²
- 3 Print and TV continue to capture a higher share of ad revenue than digital in Southeast Asia (SEA), India and Pakistan
- 4 Digital’s share of total ad spend is lower than the share of customer time spent online in some markets
- 5 Audience data-based and targeted ad sales yet to become the standard across many markets
- 6 After a COVID-induced dip, digital ad spend is forecast to continue growing for the foreseeable future
- 7 Long history of global platforms driving and enabling market sophistication
- 8 Mobile accounts for a larger share of internet traffic as compared to desktop and tablet devices
- 9 In many markets, customers prefer to use apps to access content and other online experiences
- 10 The rise of privacy is happening at a time when privacy preserving solutions are already available

1. Source: Statista, data for 2021 unless stated

Implications for privacy response:

- 1 Limited buy-side, customer and regulatory incentives to take privacy preserving action in many markets
- 2 Harder to build a business case for increased ad sales sophistication
- 3 Expectations that buy-side, ad tech or global digital platforms will provide solutions to current privacy challenges (as they already do for app-based players)
- 4 Market growth masking impact of recent privacy changes
- 5 Lack of confidence in ability to compete due to lower scale and access to data

“We do not expect upcoming legislation to go as far as GDPR.”

Multiple players across APAC

1. Source: Statista, data for 2021 unless stated
2. Source: F5 (Curve of Convenience 2020 Report)



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First-party data – A key pillar of sell-side privacy readiness

Thankfully, **some are planning to take action to make the most of the rise of privacy.**

The collection of data through their relationship with their users is at the heart of their efforts.

65% of survey respondents shared plans to increase their focus on first party data to mitigate the loss of customer insight from the withdrawal of customer consent for data collection and of browser support for third-party cookies.

This collection can result from both a direct contribution by users (zero-party data) and from analysis of on-platform behavior (first-party data).

Zero-party data

Directly contributed by the user, at key touchpoints on the customer journey (e.g. consent, registration, subscription, purchase) or through an ongoing dialogue with publishers and app developers (e.g. surveys, product testing).

First-party data

Indirectly through analysis of user on-platform behavior (e.g. purchase history or behavioral data).

For simplicity, we will use the term “First-party data” through this report to refer to both zero-party data and first-party data.

Product development

Deepened user engagement through more personal and meaningful customer experiences.

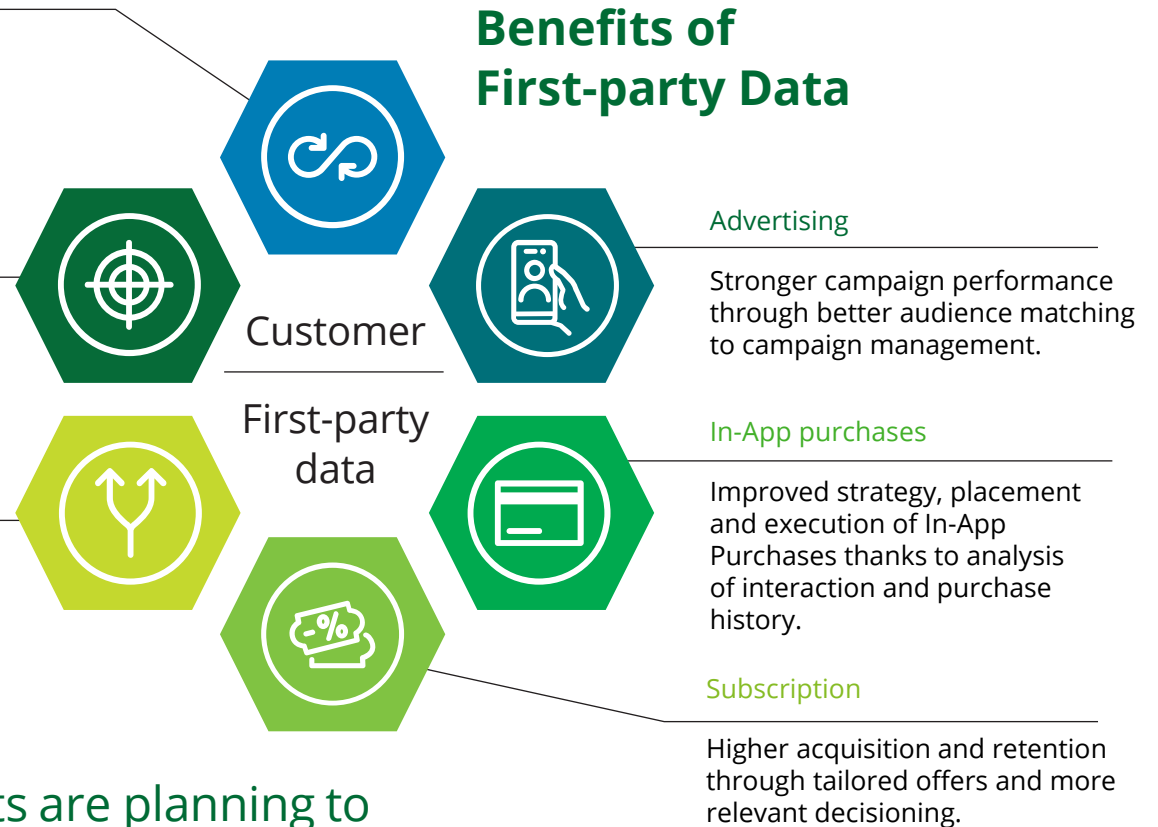
User acquisition

Higher conversion through personalized messaging.

Management decision making

Better and more informed business decisions through reliable and accurate user information.

Benefits of First-party Data



65% of respondents are planning to increase their focus on first-party data.



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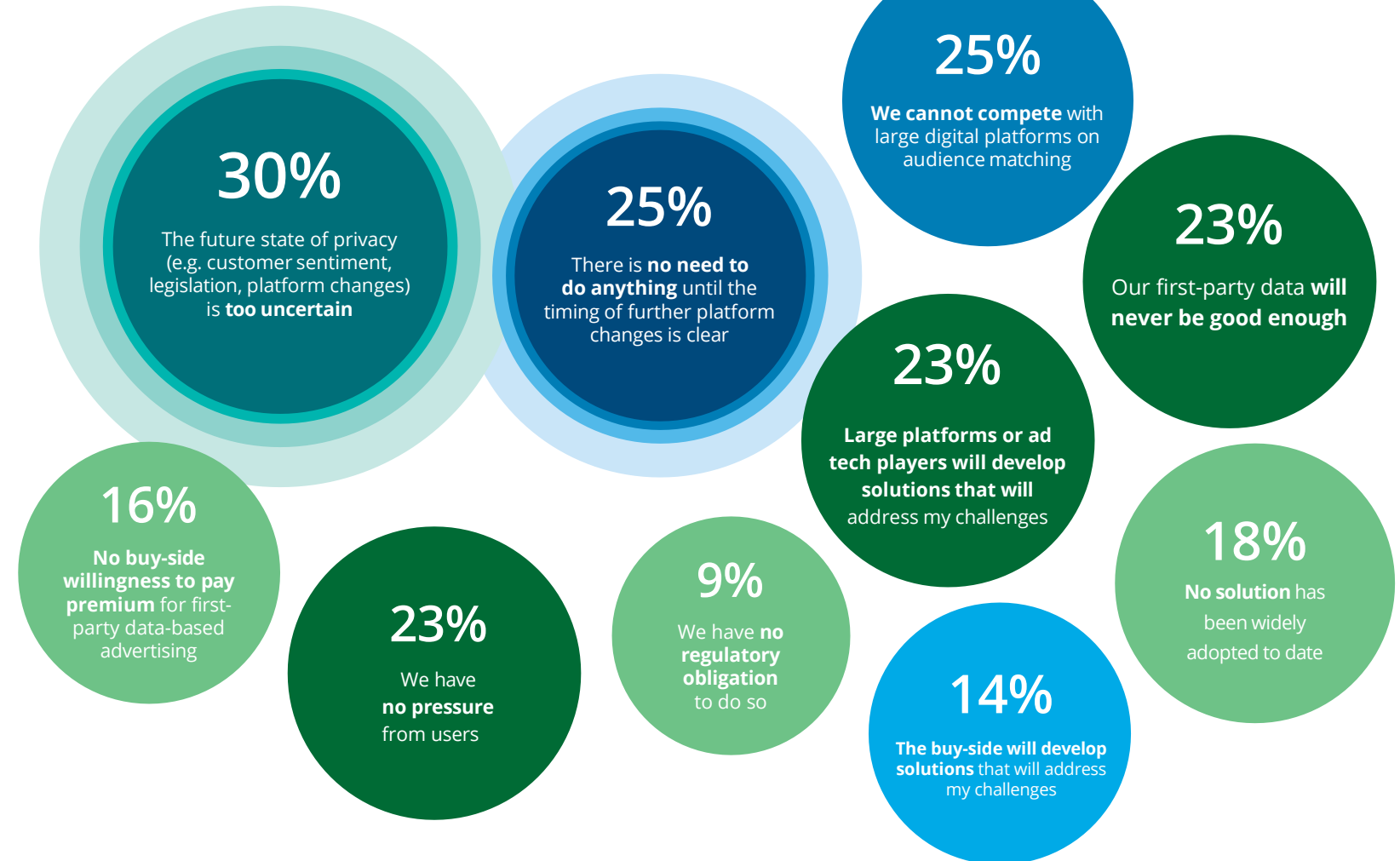
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Factors causing delay in privacy response

Meanwhile, those who chose to delay investing in a meaningful response to the rise of privacy claimed to do so for the following reasons:

- 01 "The future is too uncertain, we will wait for more clarity on the consensus best practices and technology solutions."
- 02 "Local and global competitors are making it hard for us to compete, it is easier for us to shift to other forms of monetization or rely on tried and tested techniques, like context-based ad sales."
- 03 "There is no regulatory or customer imperative to invest, we will wait till it arises."
- 04 "Low buy-side willingness to pay makes it harder to make the case for investment in data and ad sales sophistication."

What is **holding you back from investing** more aggressively in the use of first-party data in your ad sales efforts?



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A wide-ranging impact

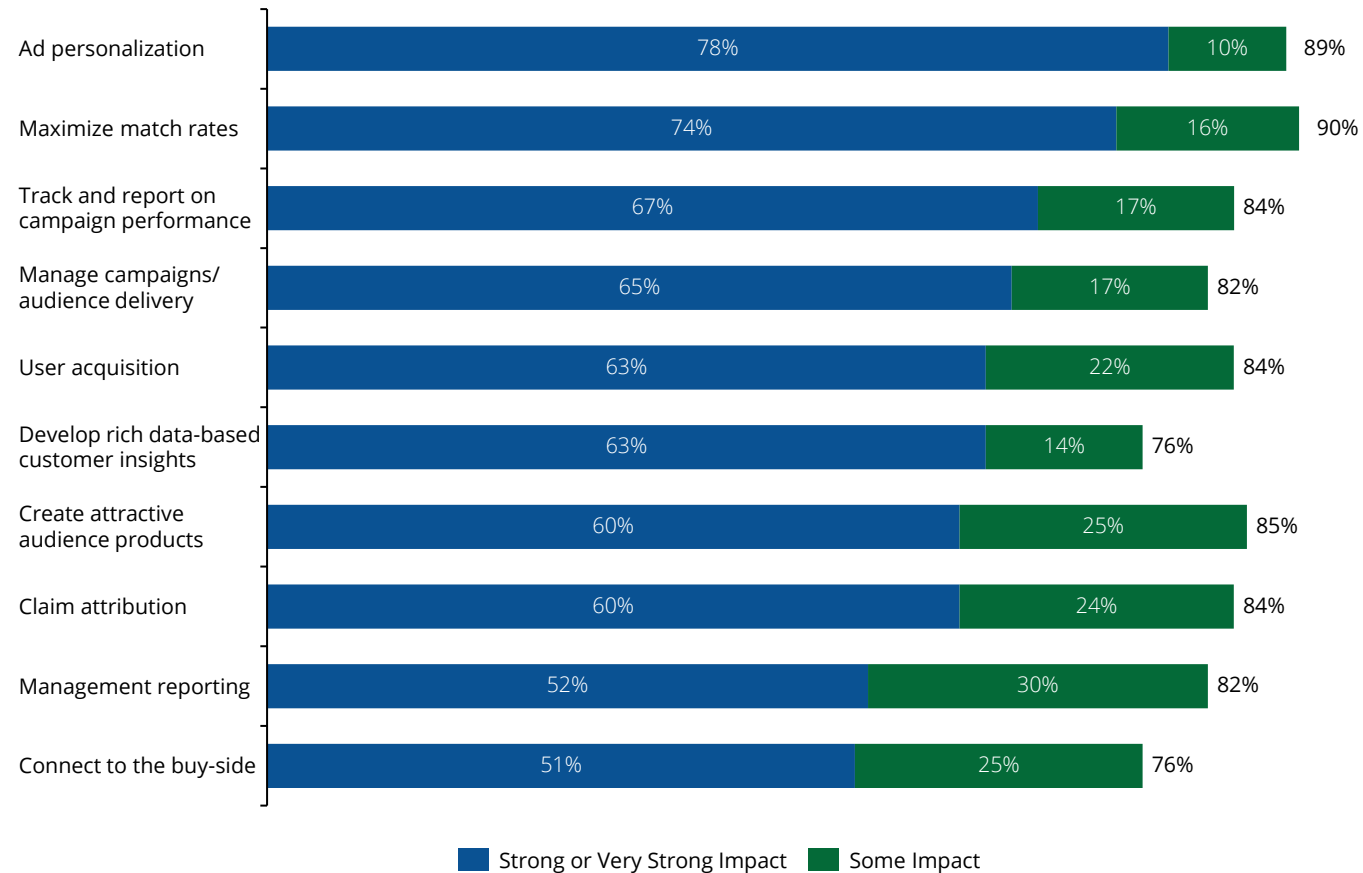
While understandable at first glance, this relative lack of action remains worrying given the **wide-ranging impact that privacy can have on all sell-side growth levers**; from product development to user acquisition to monetization and beyond.

Indeed, our survey highlighted concerns about management reporting and user acquisition that exceeded even those pertaining to advertising.

These findings show that while action may, in some cases, be lacking, awareness of the impact of privacy on business models is well understood throughout APAC.

More than 75% of respondents indicated that the withdrawal of support for third-party cookies would result in, at least, some impact on core drivers of performance from audience matching to campaign management to reporting to user acquisition.

If, today, **third-party cookies / mobile advertising IDs** stopped being supported, how much would the following key advertising activities be impacted?



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A wide-ranging impact

Impact on advertising revenues

Sell-side players around the region pointed out that **existing privacy changes are already having a profound impact on performance.**

Most notably, many reported experiencing a **30-50% drop in ad sales revenue** on browsers following the withdrawal of third-party cookie support and on app operating systems requiring users to opt in to data collection.

While some markets have, to date, been sheltered from such changes due to the low penetration of such platforms or strong market growth, these reports strongly underline the **need to take action** before similar privacy changes impact a wider range of platforms and markets in years to come.

Nearly 70% of respondents to our survey acknowledged a decline in their advertising revenue, with more than a third experiencing a decline of at least 25%.

Impact on expenditures

Similarly, **a third of survey respondents expected to have to grow both their cost base and capital investment to build the backbone of their privacy-centric operating model**, most notably first-party data capabilities and tools, such as consent management platforms and advertising technology (Ad Tech), that will make it easier for them to continue growing in a privacy-preserving manner.

For many, this means having to make a call between stronger capabilities at the cost of lower profitability and likely value erosion from their inability or lack of willingness to adapt.

A third of respondents expected to have to increase both cost and capital investment to respond to the rise of privacy.

“The real impact will not be felt until support for third-party cookies goes away!”
Japanese publisher



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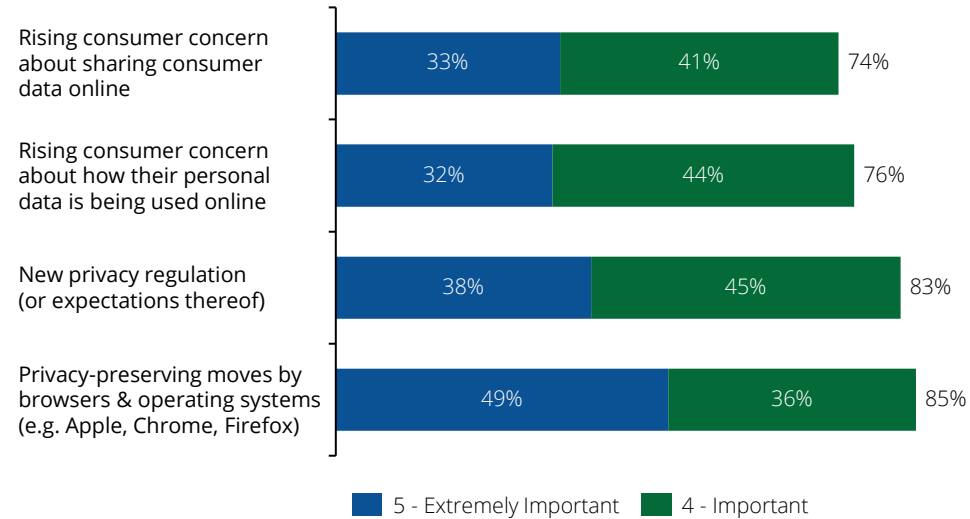
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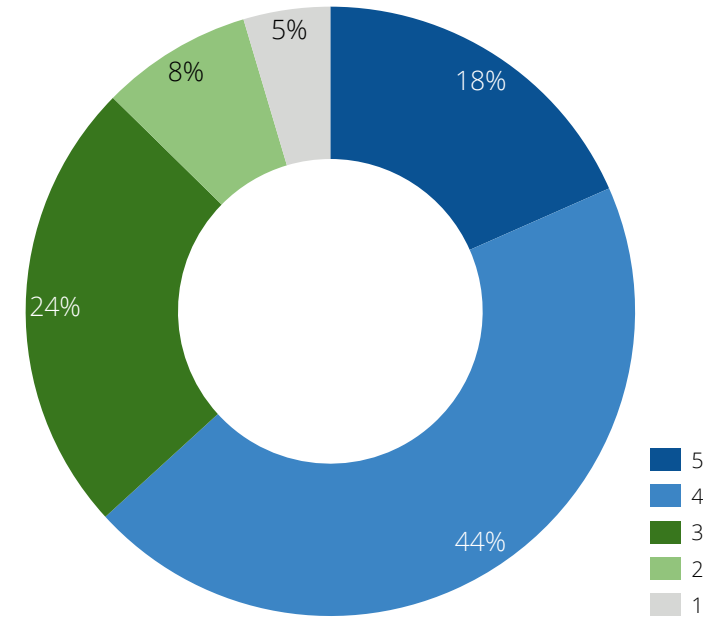
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Sell-side focus on privacy

Which of the following is most important to driving your business' focus on privacy?



Is privacy a **C-suite priority** in your organization? (Please rate from 1 to 5, where 1 is "Irrelevant" and 5 "A key strategic pillar, with accountable targets and outcomes".)



Driven in equal measure by external changes and the impact on their businesses, **close to two-thirds of respondents reported making privacy a key priority.**

And **close to a fifth of respondents went as far as to state that privacy was a "key strategic pillar".**



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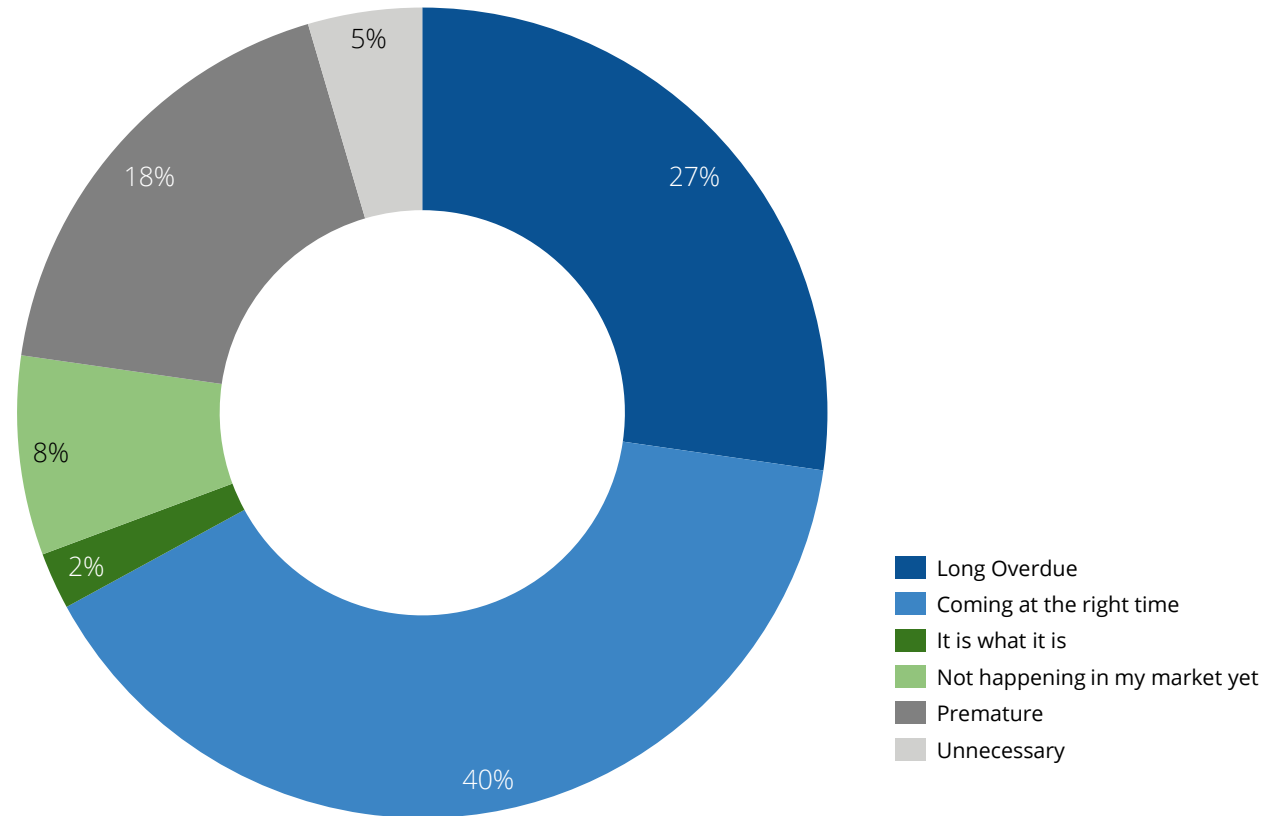
Widespread support for privacy

Coming hand in hand with this increased focus on privacy is a **widespread support for privacy changes**, with more than two thirds of survey respondents expressing the view that changes are either coming at the right time or are long overdue.

In line with international peers, this perspective appears to be consistent across web and app-based players and geographies.

In line with global peers, **more than two thirds of respondents** viewed privacy changes as either **long overdue or coming at the right time**.

Is the focus on privacy...



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Widespread support for privacy

Based on our research, the broader support for privacy seems to be driven, in part, by a **certain level of confidence in our respondents' ability to capture the data they will need to thrive in a privacy-centric future.**

While responses were consistent across web and app players, our research did show a marked difference on this key dimension across geographies with **players in more privacy-centric countries showing caution, while players in less privacy-centric countries displayed confidence.**

These differences may stem from the fact that:

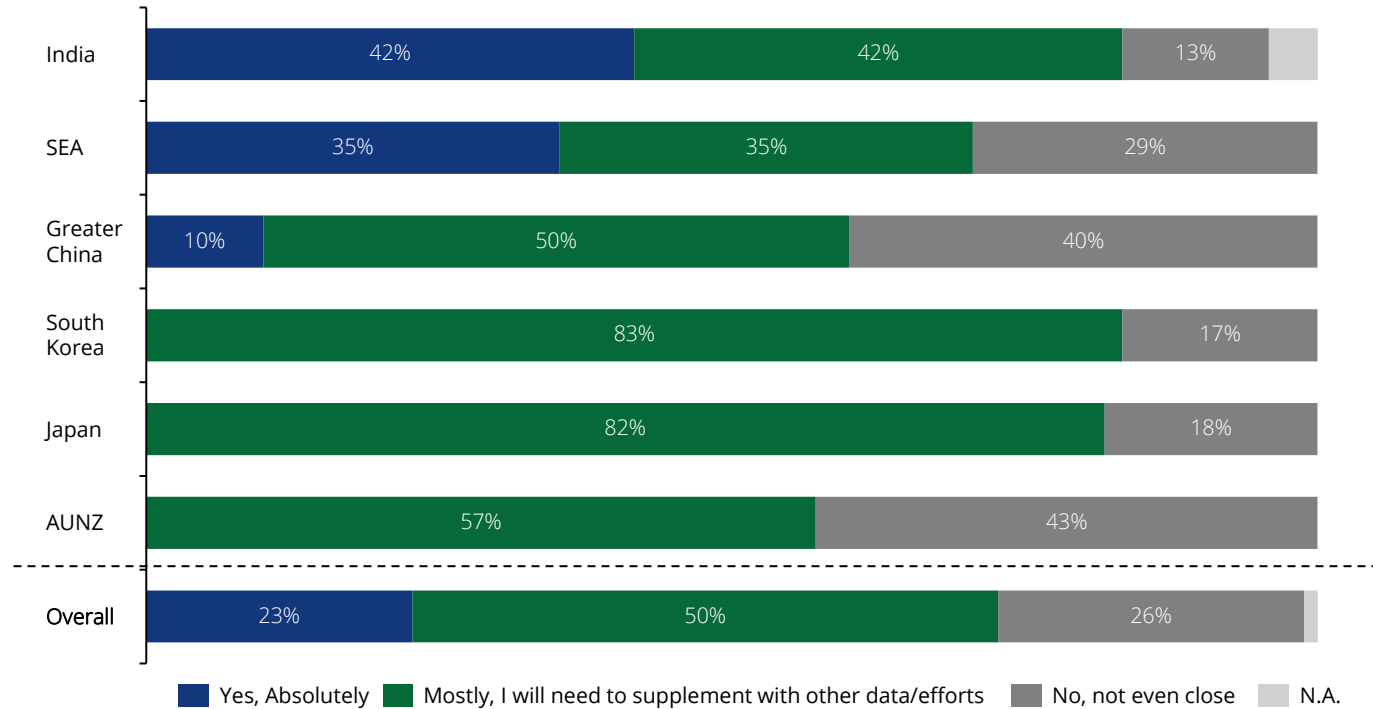


First-party data is easier to acquire in less privacy-centric markets.



As ad market maturity increases, publishers and app developers become more aware of the data required to meet buy-side demands; making it harder for them to look to the future with confidence.

Do you believe that **your first-party data** will allow you to fully mitigate the impact of the withdrawal of support for the third-party cookie?



Close to three quarters of respondents believe that they will have at least most of the data they will need to thrive in a privacy-centric future.



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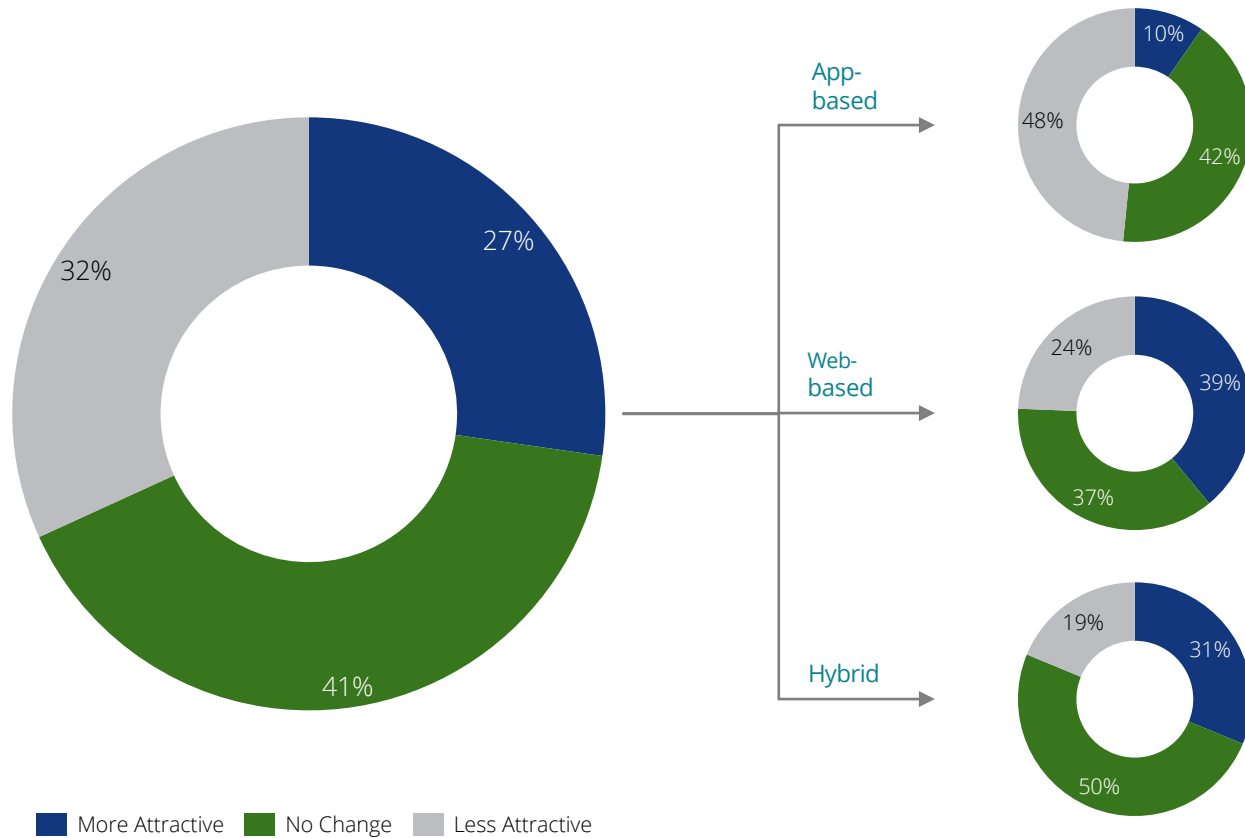
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The rise of privacy in APAC

How is the focus on privacy changing your perception of the attractiveness of digital advertising as a monetization method?



Similarly, **the rise of privacy seems to have done little to erode sell-side belief in the attractiveness of digital advertising across web players.** Close to 70% of respondents expressed a view that digital advertising will remain at least as attractive as a monetization approach as it is today.

The same cannot be said for app players who, based on our survey, seem to be looking to other forms of monetization, especially in-app purchases, to drive continued revenue growth.

Close to 70% of respondents believe that the rise of privacy will leave digital advertising at least as attractive as it is today, but the same cannot be said for app players.



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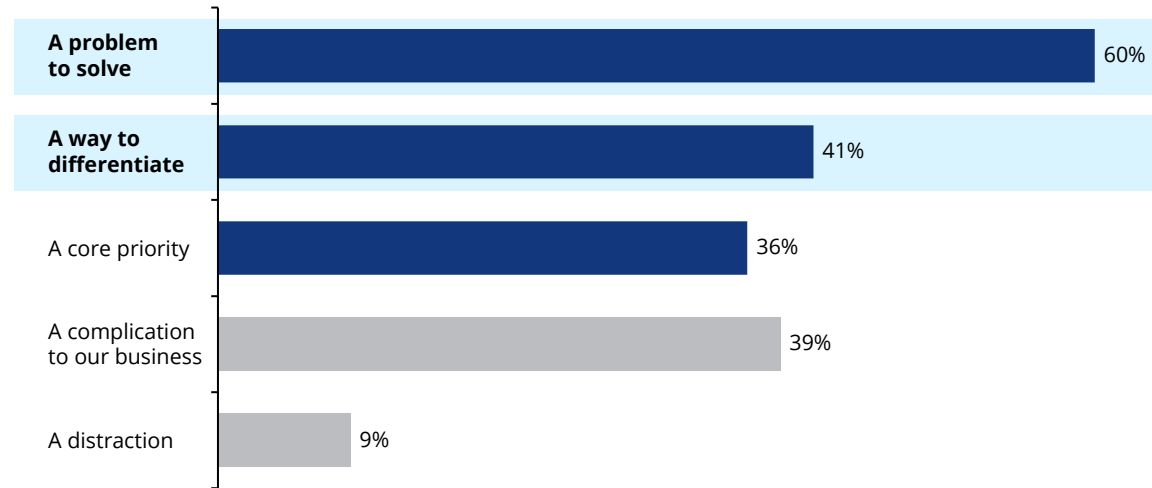
The rise of privacy in APAC

In this context, it will come as little surprise that, in line with their peers from other geographies, **APAC publishers and app developers are seeing privacy as a mix of opportunity and business challenge.**

Indeed, this nuanced response prevailed throughout most of our interviews with sell-side players.



How do you view the **increased focus on privacy**?



“First-party data and trust are key to differentiation.”

Large Japanese publisher



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Sell-side not standing still

Similarly, the strong support for privacy summarized in previous pages may come as a surprise in light of the impact of privacy measures on financial performance reported by so many of our interviewees.

Based on our research, this apparent paradox can be explained by a variety of factors, rooted in mix of market context and sell-side action.

Across most of the APAC region, awareness of the impact of the rise of privacy is leading sell-side players to take a broad range of actions, which we will explore in the next few chapters.

Whether you see privacy as a problem to solve or a way to differentiate, we hope those learnings help you accelerate your privacy journey.

Supporting privacy despite financial impact

Market context

- 1 Lack of confidence in ability to compete due to lower scale and access to data
- 2 Digital accounting for a lower share of ad revenue
- 3 Audience data-fueled ad products yet to account for the lion share of ad sales
- 4 Limited regulatory intervention or enforcement
- 5 Low penetration of browsers having withdrawn support of third-party cookies and app operating systems asking users to opt in to data collection
- 6 Based on history, perception that platforms will innovate new technologies to address privacy challenges

Sell-side not standing still

- 1 Collecting, analyzing and augmenting first-party data to mitigate loss of third-party signals
- 2 Finding success with privacy-preserving ways to connect to the buy-side
- 3 Experimenting with new ad formats, such as rewarded ads
- 4 Diversifying revenue sources, including in-app purchases and subscription models

“Our culture is all about being a leader not a laggard... we are very techie and want to be seen as such!”

South Korean app developer



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Chapter 02

Setting up for first-party data success



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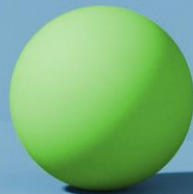
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Setting up for first-party data success

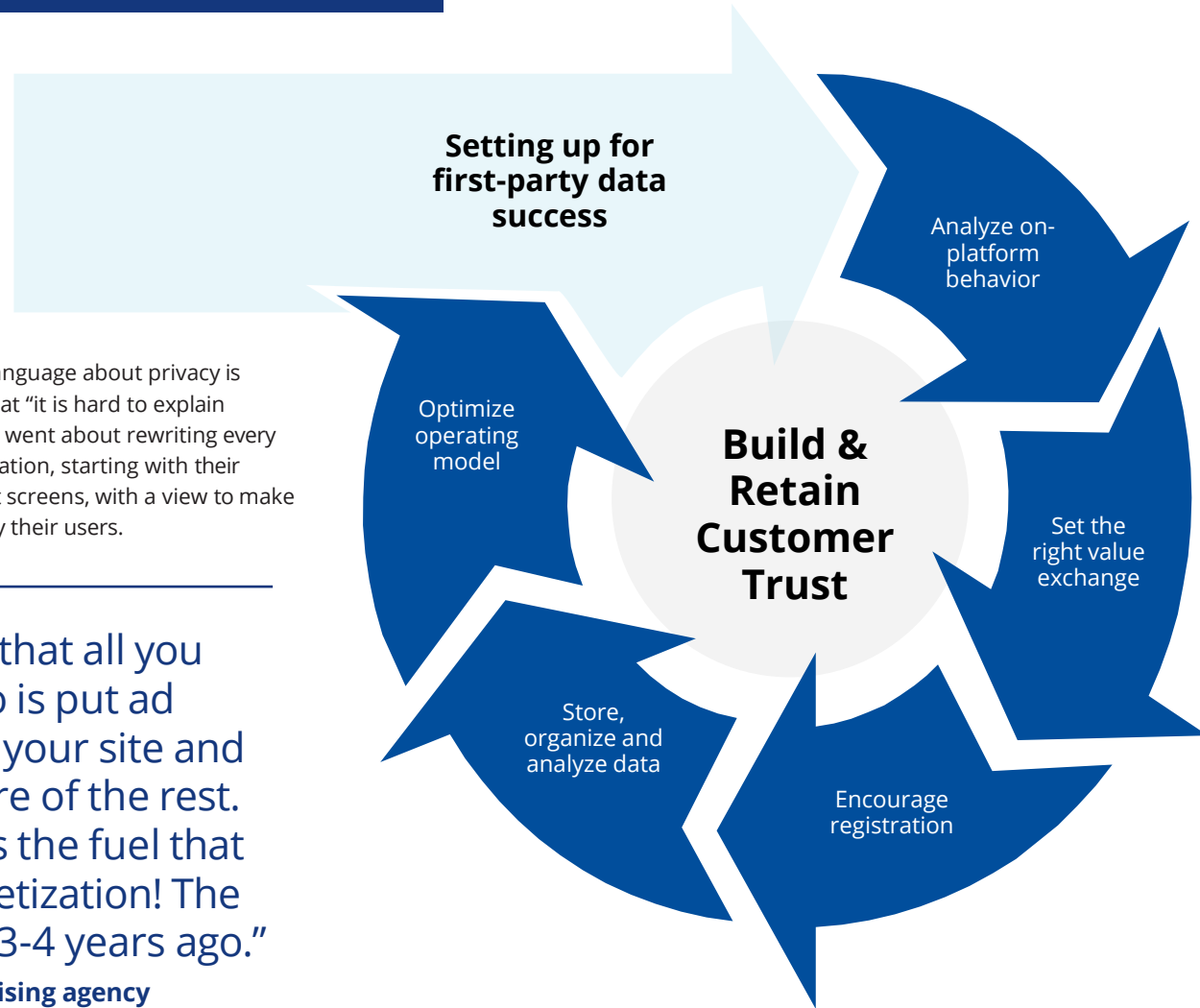
Despite differences across geographies, 65% of our survey respondents reported plans to evolve their data strategy in response to the rise of privacy, starting with an increasing focus on collecting more data as part of a trust-based relationship with their customers.

Whether out of a desire to “keep customers safe”, to “make them comfortable their data is not being misused”, or to “educate them about privacy”, some of our respondents took great care in the way they communicated with their users at every step of the data collection journey.

Their aim is simple: to **lay the foundation for a two-way relationship with the user that will build and sustain customer trust**, which, in turn, will enable data collection and value creation.

Aware that “much of the language about privacy is drafted by lawyers” and that “it is hard to explain privacy and consent”, they went about rewriting every privacy-related communication, starting with their privacy policy and consent screens, with a view to make it easily understandable by their users.

“It used to be that all you needed to do is put ad inventory on your site and tools took care of the rest. Today, data is the fuel that powers monetization! The shift started 3-4 years ago.”
APAC digital advertising agency



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Build and retain customer trust to enable data collection

Through a partnership between legal and marketing teams, leading publishers tirelessly experiment with ways to redesign touch points from a customer-centric perspective, asking for consent in a [meaningful, memorable and manageable way](#), while satisfying both regulators and risk managers. In so doing, they use visual language wherever necessary to overcome education or language barriers, and adjust their approach based on product and geographies.

This approach has allowed them, in line with leaders in other markets, to achieve **consent rates of up to 85% and opt-in rates of up to 55%**, showing that privacy does not have to come at the expense of good business.

Top tips from Market Leaders on how to earn customers' trust:



Use simple language



Do not sound like a lawyer



Tell customers what they will get for opting in



Do not use misleading visuals (especially buttons)



Make it clear why you are collecting data



Use UX to remind users of the benefits of opting in (e.g. "Premium Content" tag)

Case study #1

Consent in the service of differentiation, inclusion and universal provision

Despite having no legal obligation to do so, a leading Australian broadcaster decided to ask users for their consent before collecting their data.

Seeing this move as a key enabler of its mission to reach every individual in the country regardless of background and education level, the company's cross-functional privacy team drafted its consent banner, privacy FAQs and privacy policies using **simple language that was free of jargon**.

In so doing, it made sure to clearly explain that users would retain control over their privacy settings and how their personal information would be used.

It is early days yet, but it hopes that, in line with a global publisher with a strong presence in the market, **this transparent approach to privacy will encourage users to create a free account** before they watch content on demand.

For the time being, **customer engagement is up**, showing that while privacy is yet to become as much of a focus in Australia as it is in other parts of the world, **customers care about the way it is handled**.



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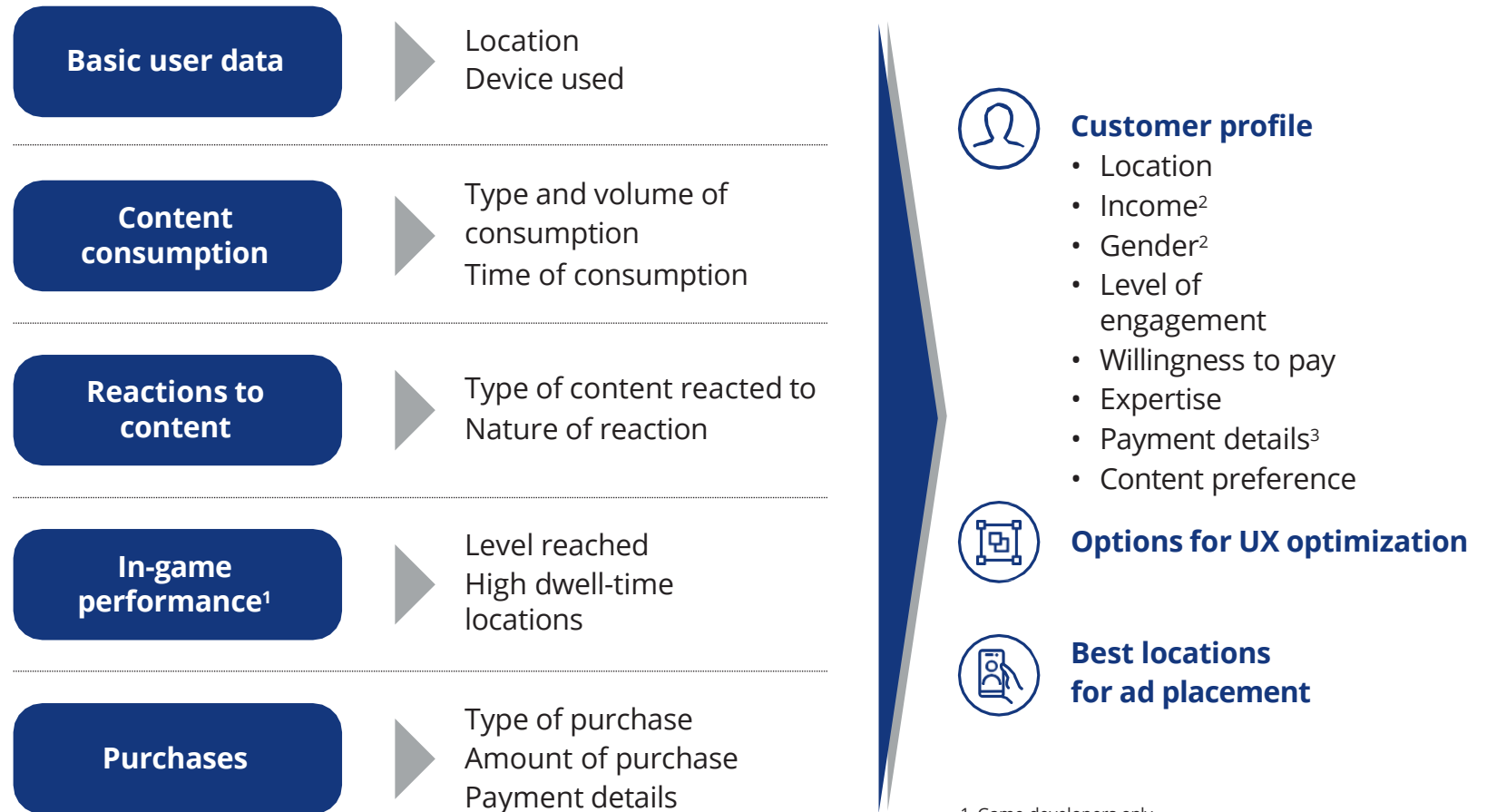
Analyze on-platform behavior

Having received consent from their users (either directly or through a third-party opt-in), all publishers and app developers we spoke to set about collecting data about user behavior on their own platforms.

This approach provides deep insight into customers without the need to ask them to contribute information of any kind, including personally identifiable information (“PII”), to lay the foundation of a robust first-party data model.

It is particularly helpful in personalizing user experience and in starting to develop behavioral and socio-demographic cohorts that can be shared with the buy-side.

Common on-platform behavioral data collection and activation



1. Game developers only
2. Through probabilistic modeling
3. Not necessarily captured by platform



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Analyze on-platform behavior

This approach also aligns to an important principle of responsible data collection, highlighted by multiple respondents: **“only collect the data you need!”**

This, of course, **does not mean that the collection of personal information from users on one’s platform is incompatible with privacy**, provided such collection is done in a fair, transparent and privacy-preserving manner.

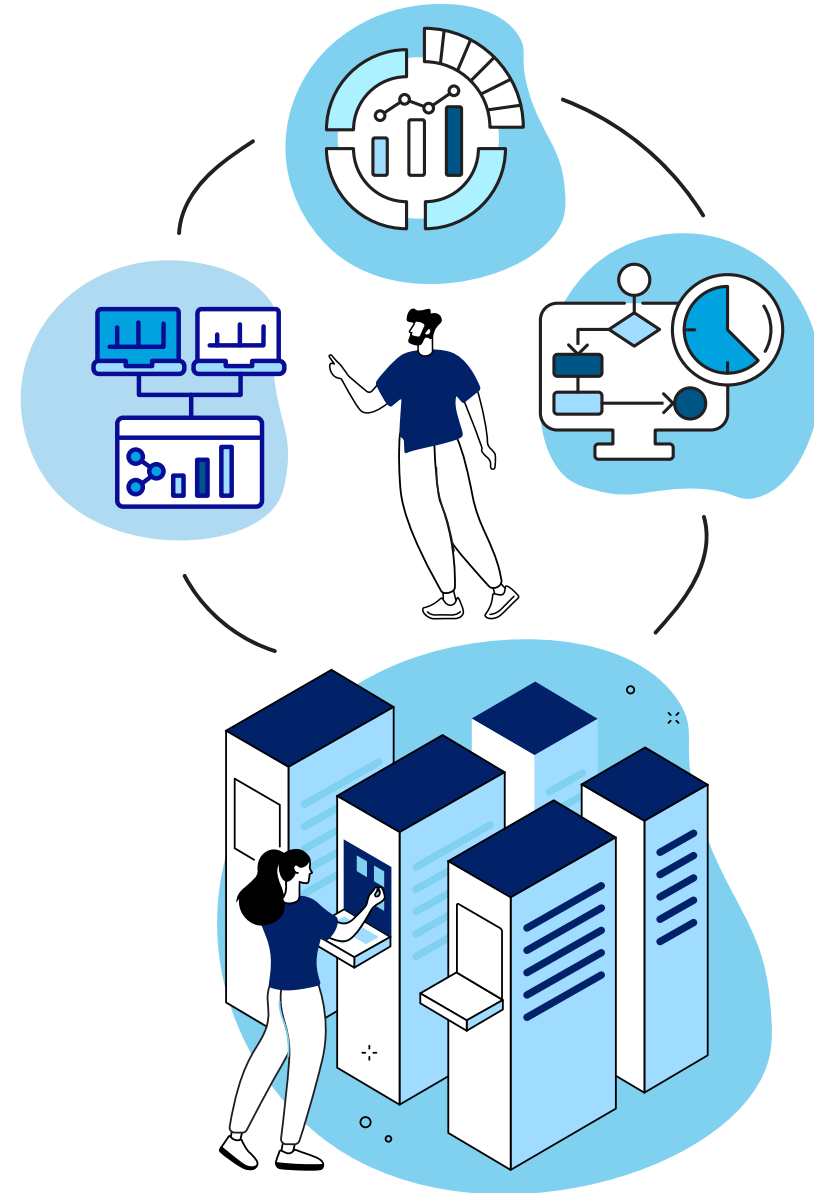
Similarly, it is important to highlight that **preserving customer trust and privacy relies equally on how data is used as it is on the nature of data collected**. For example, ultra-targeted messaging or excessive data sharing can be seen as “creepy” or “excessive”, reducing customer trust and willingness to share data.

The key is to **secure user consent in a transparent manner** as well as to **share and leverage data in a responsible way**.

Myth buster

Myth: “Collecting personal information is against the spirit of privacy.”

Fact: The collection of personal information about users on one’s own platform remains a core pillar of many strategies even in most privacy-centric markets.



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Set the right value exchange

Virtually all the players we spoke to understood that **successfully collecting first-party data at scale required offering customers something in exchange.**

Showing great creativity, they set about encouraging data sharing through **six complementary sets of incentives:**

- 01 Personalization
- 02 Access to a greater volume of content
- 03 Access to premium content
- 04 Access to advanced functionalities
- 05 Financial and non-financial rewards
- 06 A two-way relationship

Setting the right value exchange



Personalization

Giving users content and communications that are more in line with their interests and needs.



A two-way relationship

Engaging with users in a deeper way.

- Surveys
- Polls
- Like buttons
- Super users and other customer groups



Premium content

Giving users access to content not available to everyone.

- Exclusive audio or video content
- Access to special events
- Web / app-only content
- Free trial of premium service or early preview of upcoming game
- Newsletters



Advanced functionalities

Allowing users to enjoy a richer digital experience.

- Ability to bookmark or share content
- Ability to comment or contribute
- Seamless integration across platforms
- Ad-free experience
- Access to off-platform assets (e.g. picture) on platform



Rewards

Recognizing users' contribution with material incentives.

- Loyalty programs
- Sign-up offers
- Sweepstakes



Greater volume of content

Giving users access to more content for free.



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Set the right value exchange

Case study #1

**Loyalty and first-party data -
A match made in heaven**

Loyalty and membership programs that require users to register offer a great opportunity to collect user data beyond a publisher's core business.

They can take many forms depending on the publisher's editorial focus and user base, but here are two examples from our research:

- 1 A leading publisher in Singapore created a **free lifestyle rewards platform** for members, offering them cashback and promotions on shopping, dining and travel, often linked to the publisher's own lifestyle guides.
- 2 An Australian real estate publisher offers an **exclusive discount on home-related products and services (e.g. furnishings, styling, loans)** to members and, in so doing, building loyalty, while sharpening its understanding of customers.

The value exchange in action: driving data collection by offering tangible value to users.

Case study #2

A two-way dialogue to build first-party data advantage

An Indonesian game developer seeks to understand users by engaging them intimately.

Through regular **surveys**, it asks users for their opinion on a wide variety of topics spanning far beyond their core gaming habits. Rather than use "real world" incentives, it successfully drives a high response rate by offering cashless in-game currency to encourage participation.

It also engages with a group of core users through third-party **messaging apps**, gathering feedback on key product updates and features prior to launch, making these users feel valued, while deepening its understanding of their preferences.

Finally, it drives registration and gathers further customer feedback through **live gaming events**, during which viewer reactions generate even more insights.

All great ways to build rich customer personas while nurturing the type of intimacy that drives customer loyalty.



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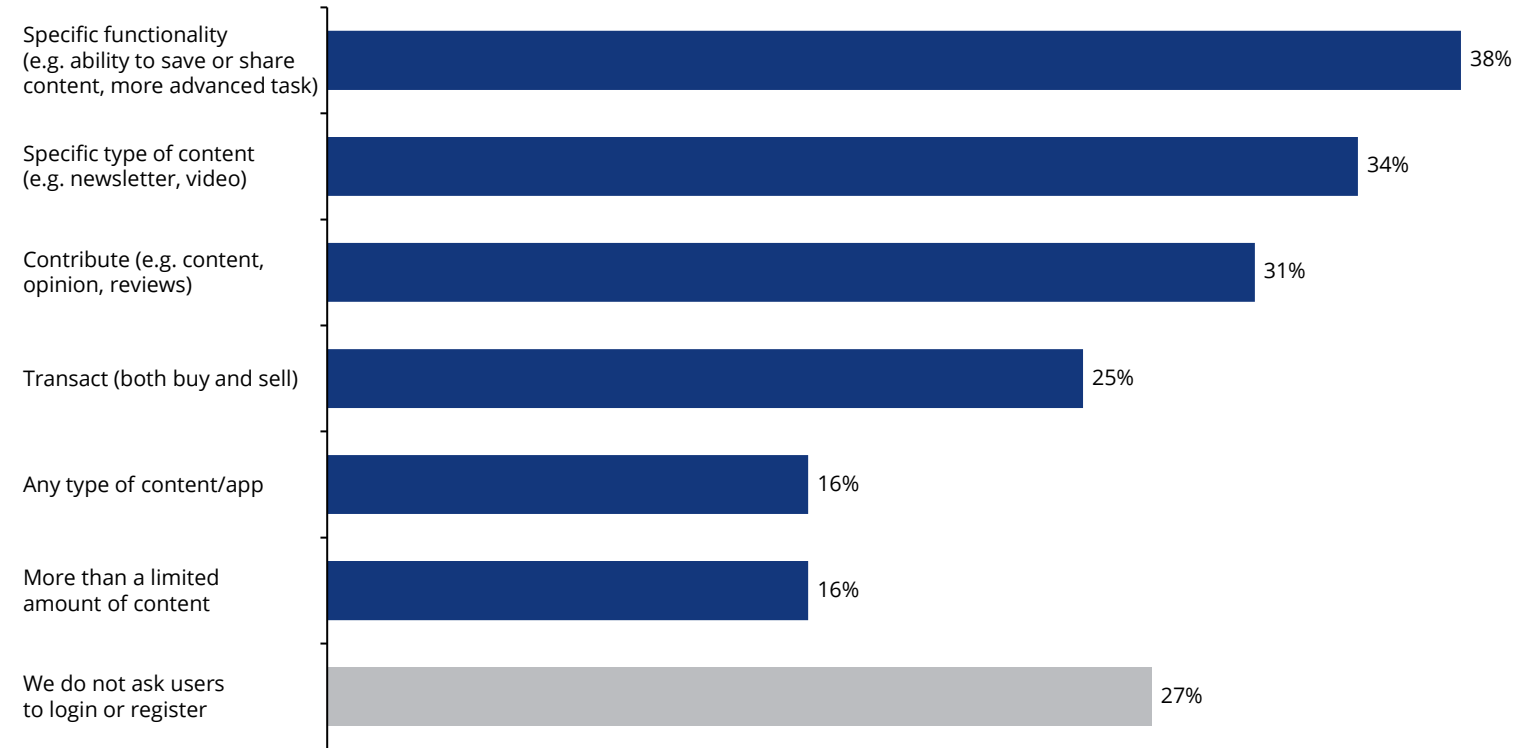
Encourage registration

Using a mix of value exchanges, close to **75% of the players we surveyed made registration a priority** on, at least, part of their platform. Constantly testing new approaches to balance collection and impact on customer experience, these players sought to make it easier to continue analyzing user behavior across their properties long after support for third-party cookies has been withdrawn.

In so doing, they are **creating the foundation for a rich data model** that can drive all activities across the company.

Their example shows how creativity and innovation, especially when anchored in existing areas of strength, can transform first-party data efforts and build competitive advantage in a privacy-centric world.

For which of the following do your users have to register and login?



Close to 75% of respondents made registration a priority.



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Encourage registration



Case study

Combining third-party SSO and OTP for registration success

An Indian publisher with 140 to 150m unique users started its privacy journey in 2018, when GDPR began impacting its relationship with the Indian diaspora in Europe.

Aware of the broad benefits of first-party data, the publisher requests consent for basic data collection (name, email and/or phone number) from users when they land on its platform, offering the option to use either its own form or a set of three **third-party Single Sign-On (SSO)** solutions to make it easy for users to register.

Leveraging its plentiful access to on-screen talent, it has also used an innovative **one-time password (OTP)** solution to collect the same data as part of the registration process for special events such as “chats with news anchors”.

The combination of these two data collection techniques has allowed this publisher to **authenticate 85% of traffic on its sites**, enabling the creation of rich, well-structured audience profiles.

The profiles serve as the backbone of a proprietary segmentation that fuels audience matching (or “ad bucketing” as the publisher calls it) and other privacy-preserving sales and marketing efforts that have contributed to an impressive **60% growth in its user base**.



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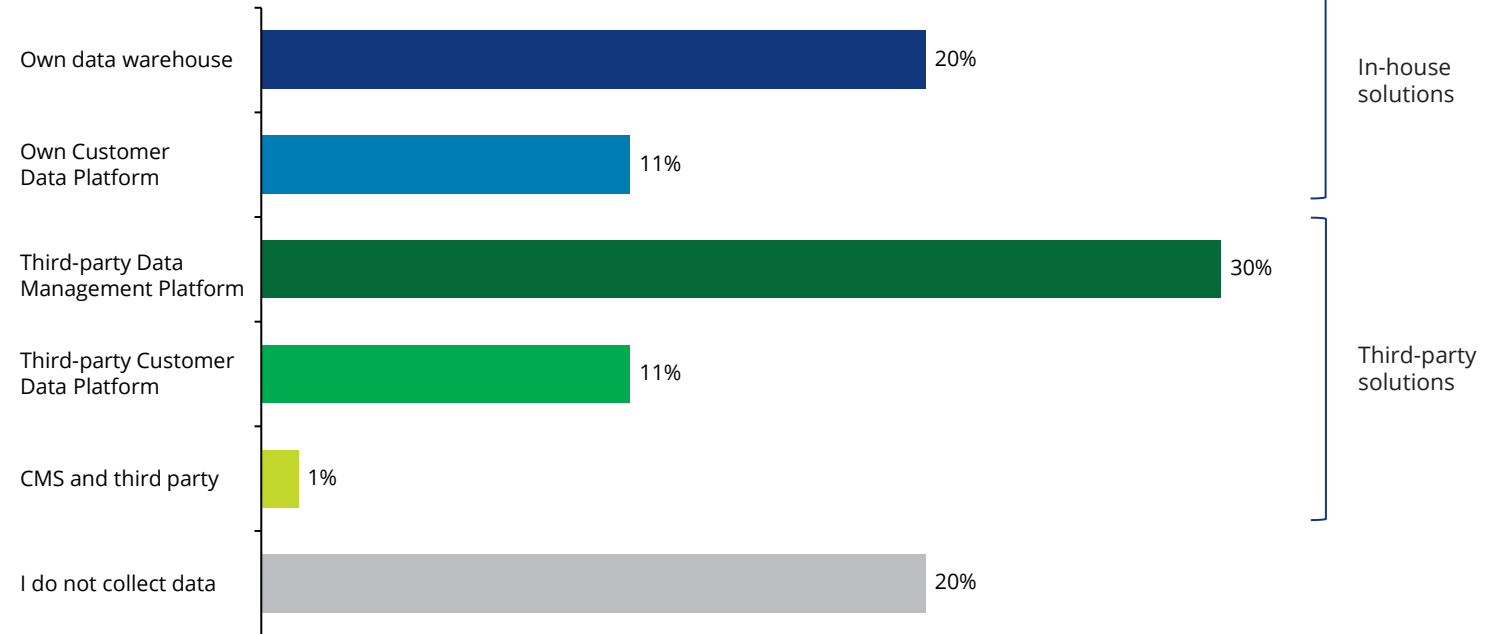
Store, organize and analyze data

Coming hand-in-hand with the need to capture data through a direct relationship with customers is the question of how best to store it, prepare it and develop it.

In contrast to their international peers, the APAC players we surveyed still primarily relied on third-party hosted Data Management Platforms (DMP) and third-party Customer Data Platforms (CDP).

At the same time, multiple players we spoke to reported a decrease in the quality of the data on DMPs likely due to their declining ability to capture data from users (due to privacy changes) and from publishers, who are increasingly opting to drive their ad sales efforts from CDPs.

Where do you currently store data?



“We are still using a third-party DMP, but data quality is eroding, so we are looking at alternative solutions!”

Large Thai publisher



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Store, organize and analyze data

This shift, which we witnessed in other geographies, stems from a sell-side desire to **take more control over first-party data**.

While demanding significant financial commitment and access to the data & analytics teams necessary to build and operate them, these internally-developed solutions have, in their opinion, some significant advantages, especially in allowing them to drive multiple activities (e.g. content personalization, user acquisition, ad sales, subscription, in-app purchases, strategy development and management reporting) from a single source.

Turning away from third-party solutions, these leading players have invested significantly in building and leveraging owned and operated Customer Data Platforms.

		CDP	DMP
	Ownership & management	In-house or third-party	Third-party
	Data source	First, second and third-party data	Anonymized third-party data
	Use cases	All relevant company activities, especially sales and marketing	Advertising and lookalike modeling only
	Activation	All relevant channels (e.g. DSP, CRM)	Primarily through DSP
	Data silos	Potential to unify data architecture	Keep separate advertising data repository
	Data storage	Long term	Up to 90 days



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Store, organize and analyze data

In line with findings from the [CDP institute](#), these internally-developed solutions have, in the opinion of publishers and app developers who have adopted CDPs, some significant advantages, especially in allowing them to:



Craft a more holistic data strategy powering multiple parts of their business in a way that truly fits their company's context and strategy



Make better use of first-party data through the use of machine learning



Integrate data sources while minimizing system integrations and handovers



Retain a long-lasting control over who uses first-party data and, in so doing, retain control of their destiny

“Data integrity and quality is incredibly important if you are an ad buyer.”

Large Australian publisher



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Store, organize and analyze data

As highlighted by a leading Singaporean publisher, **the benefits inherent in the use of CDPs come with increased complexity**. Hence, it is essential that all players embracing this tools have a **“robust approach” underpinning data collection and activation**.

This journey starts by ensuring that **all data is “cleaned” and laid out in a way that allows all key systems to use it**. Indeed, multiple players we spoke to reported having relevant first-party data, but not being able to leverage it as it was not in a form or location that allowed them to do so.

As this work can be complex and time consuming, a South Korean app developer advised prioritizing this effort based on each integration’s **impact on key performance indicators** or OKRs.

To address this challenge in a more systematic manner, other players also reported **setting out a standard data taxonomy** (e.g. around the definition of specific in-app events or data points) across their properties.

While it can take years to complete, this work has great value in feeding a company’s data model with clean, robust data from every customer touchpoint.

To help in this regard, our most advanced respondents **structure these rich data models around first-party identifiers**.

These identifiers can be explicit like a user name set at registration or implicit, like a user number allocated to a particular profile through analytics.

These identifiers are a great way to structure data collection and organization across sites or apps.

They can also be passed on to the buy-side to enable matching of both cohorts and individuals in a privacy-preserving manner.

Managing first-party data complexity

- Clean your data
- Make your data useable by all key systems
- Make sure that all use cases link to key performance indicators
- Set a standard taxonomy across properties
- Leverage first-party identifiers

“You need to have a very clear data structure in mind.”

Large Indian publisher



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Store, organize and analyze data

Case study

Building competitive advantage in the video space

As part of its efforts to compete effectively with global platforms, a leading Australian publisher spent the last few years working in close partnership with technology vendors to build the data and software architecture it needed to stand out in a privacy-centric marketplace.

Following a **sustained registration drive**, the company uses proprietary software to create **a single identifier for its users across a growing number of its properties**. Constantly enhancing a rich first-party data model through **progressive profiling** across owned and third-party platforms, it has built a very rich picture of users that underpins all of its sales and marketing activities.

Most notably, the company now passes these first-party signals to the buy-side, **powering 40% of the ads it serves through its proprietary data set**.

This approach allowed it to **grow data-based ad revenue** tenfold over the past four years.

Next stop: scaling of this privacy-centric approach in partnership with other broadcasters.

A great example of how the right tools and approach can help power strong ad sales growth in a privacy-centric era.



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Augment your data

In markets like Europe and the United States, first-party data is routinely merged with third-party data sets, often focused on socio-demographic information, location data or category-specific customer insights (e.g. media consumption habits) to complement insights and audience matching capabilities created through first-party data.

Leading players in more advanced markets, like Australia and Singapore, are increasingly following this path, even experimenting with privacy-centric ways of matching their own data with advertiser or partner first-party data, also known as second-party data.

This being said, based on our interviews, it seems the high-quality datasets and technical sophistication required for this kind of analytical augmentation are yet to materialize around most of the APAC region.

As a result, in many markets, those that have attempted to follow this strategy have yielded limited benefits, due in great part to low match rates.

Instead, these players recommended using **first-party data-based “natural segments”** (e.g. age, income, language, ethnicity) to underpin segmentation.

These segments, that the buy-side already attempts to reach, can be derived from data points (e.g. type of device used, interests, consumption time, location) that are readily available through analysis of on-platform behavior. For example, the type of phone used can be a good proxy for income; interests can be used to derive age, gender and income through probabilistic modeling; while language and location can underpin regional and linguistic audience matching.

This technique regularly allows an Indian publisher to achieve fill rates of around 80-90%.

While it does require some level of analytical capability, this technique is a great way for those in low data maturity markets to offer audience matching solutions without breaking the bank.

“We attempted to use third-party data, but could only achieve 5-6% match rates at a very low level of confidence.”

Large Indian publisher



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Optimize your operating model

Beyond the technical sophistication described throughout this chapter, our most advanced interviewees took great pain to stress that, **at the heart of any data maturity effort, is a team**, working in close partnership with every part of the organization.

“The data team is critical”

Chinese app developer

Across the world, it is clear that, while agencies remain a core resource for those not able to do so, in-sourcing data and ad sales capabilities is an increasingly important step towards building the foundation for ad sales success in the age of privacy.

Similarly, the right structures and processes need to be put in place to ensure a robust approach to privacy protection.

As a result, despite differences in regulatory regimes across the region, **the majority of survey respondents claimed to have started upgrading their internal data governance.**

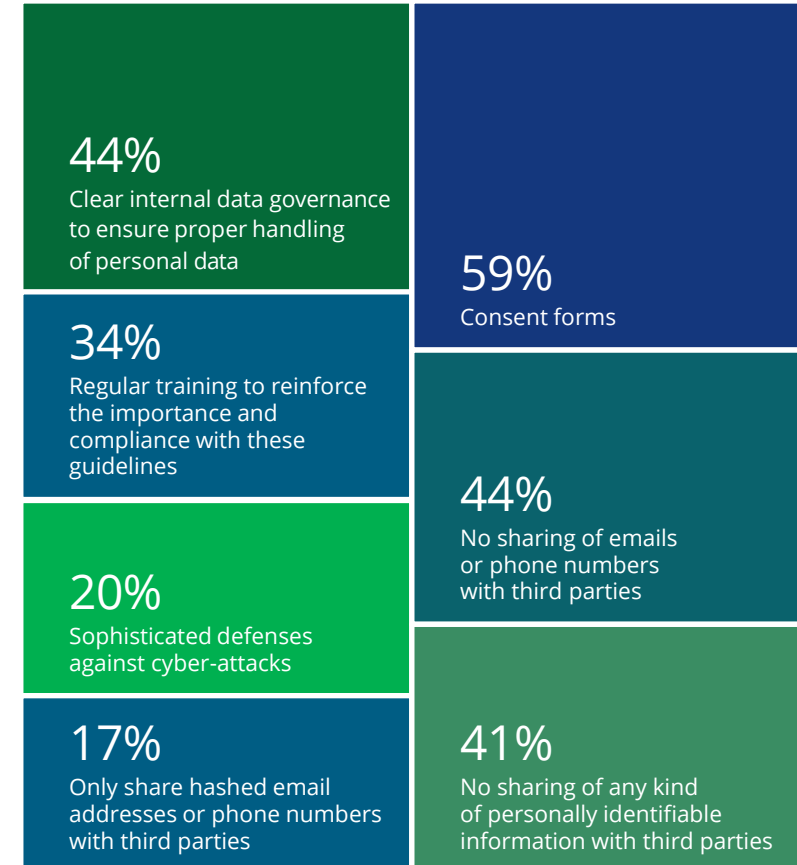
In countries where regulation required them, and for players with large US or European footprints, these efforts even involved the appointment of a Data Privacy Officer or a Privacy Council.

At the same time, it is clear, when talking to our most privacy-centric interviewees, that there is no substitute for a customer-centric culture in successfully preserving customer privacy.

Almost two thirds of respondents were already asking for consent to collect data, while close to half reported having set up **clearer internal data governance** to face into the rise of privacy.

Setting up governance

Levers used by respondents:



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Upgrade your operating model



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Case study #1

Building your team

Speaking to players around the region allowed us to receive the following advice on how to build an effective data-led ad sales team in the face of a global war for talent:

- 1 Prioritize mindset over experience
- 2 Trust talent with a traditional background to adapt to a digital, privacy-centric way of working
- 3 Ensure all recruits can demonstrate using some form of data in meeting their objectives
- 4 Bring the team together on a regular basis to discuss recent ecosystem changes, their impact on the business and the team's top tips to thrive in the ever-changing landscape
- 5 Invest in on-the-job learning and development

Case study #2

Upskilling your team

Long-term success depends on an organization's ability to share the required knowledge and build the necessary skills to compete. Here are a few ways the experts we spoke to have gone about doing so:

- 1 **Data training as a pillar of onboarding:** To build data capabilities amongst all of its employees, a South Korean app developer offers new employees data training opportunities over the course of their three-month probation period.
- 2 **"Lunch & Learn" by in-house expert:** An in-house specialist at a Vietnamese publisher holds regular training sessions with colleagues to give them the skills to troubleshoot issues on their own. He also leverages his expertise, acquired in part through a close partnership with the company's main technology partner, supporting the company's many data and ad sales-related experiments.
- 3 **Training on new tools:** A publisher in Australia encourages employees to attend masterclasses and get training on new tools so that it can derive the most value from its ad sales technology.
- 4 **Sales training:** An Indian publisher holds bi-weekly meetings to train its sales team on ad tech tools so they can have more effective conversations with their advertising customers.
- 5 **Interactions with Tech Providers:** Like many sell-side players across the region, a Vietnamese app developer holds bi-weekly webinars and meetings with privacy solution providers to keep up to date with upcoming changes, performance optimization opportunities and general market evolution.
- 6 **Learning from peers:** Like many APAC peers, a Vietnamese publisher reached out to the International Association of Newspaper publishers and to some peers in Europe to learn best practice in driving growth in a privacy-centric ad sales ecosystem.
- 7 **Spreading the word:** The programmatic lead of a leading New Zealand publisher has been joining as many project teams and meetings as possible to help build up the organization's knowledge of AdTech and Programmatic.

"In an age where your skills need to keep growing and evolving, you cannot hire for skills. You have to hire for attitude, heart and strong fundamentals."

Large Singaporean publisher

Chapter 03

Connecting to the buy-side



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A confusing technological landscape

Third-party cookies have provided an easy, albeit imperfect, way to match sell-side audiences with buy-side demand.

With the withdrawal of support for third-party cookies well underway, publishers, and to a lesser extent app developers, have been looking for alternative ways to connect to the buy-side.

“The tech is here, but strategies still seem to be basic.”

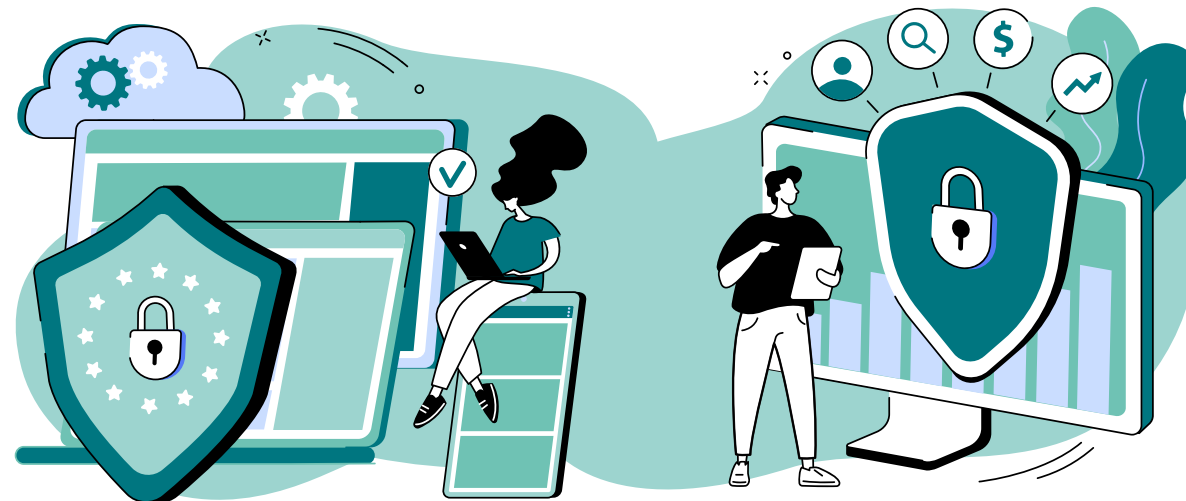
Large New Zealand publisher

While many solutions are on offer, supported by case studies from around the world on how to use them, many found choosing a particular solution a challenge.

Indeed, **many solutions were yet to meet with significant demand from the buy-side**, making it harder for players to default to a particular option.

In addition, speaking to publishers and app developers around the region, many of whom had not yet evolved their strategy, it became clear that the choice of a particular solution depended on a company's unique context and perspective, especially the following six dimensions:

- 01 The degree to which a company has access to plentiful relevant first-party data
- 02 The level of sophistication of a company's data management efforts
- 03 Whether a company's ad sales efforts are focused on enabling individual or cohort matching
- 04 The extent to which it was willing to invest in the face of significant uncertainty
- 05 Whether a company believes sharing encrypted personal identifiers is in line with privacy
- 06 Its willingness to trust a third-party with its first-party data



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Myriad solutions... and more to come



Relevant to app players

In talking to our respondents, it became clear that each technology faces its own unique set of challenges.

		How it works	Data maturity required	Requires 1P data sharing	Key Challenges	Solvable?
First-party data-based solutions	Ad exchange based	 Publisher creates custom audiences based on customer attributes and makes them available for purchase through an exchange	Medium		<ul style="list-style-type: none"> Custom sell-side audiences may not match buy-side campaign objectives Taxonomy needs to align across ad exchanges to ensure sufficient reach 	Partially
	Clean rooms	 Publisher and advertiser both provide identifiers into a clean room to identify a set of users that meet advertiser needs	High		<ul style="list-style-type: none"> Requires significant data management maturity Need to partner with several clean room vendors (each with its own technology) to ensure a meaningful buy-side coverage 	Partially
	First-party identifiers	 Publisher creates encrypted identifiers that are specific to its site(s) and shares it through its ad exchange, selecting with whom this ID can be shared	Medium		<ul style="list-style-type: none"> Matching first-party identifiers to an individual or cohort usually requires additional information Potential to create multiple first-party identifiers per user, including across app and web 	Partially
Third-party solutions	Third-party audiences	 Buy-side and sell-side send attribute data to an SSP, moderation platform or ad exchange provider, which is used by the provider to build audiences	Low		<ul style="list-style-type: none"> Requirement to keep control of platform complexity will limit number of trading audiences provider can make available 	No
	Third-party ID graphs	Third-party player creates a “unified” identifier based on hashed email or phone number provided by both buy-side and sell-side, who are then allowed to use this ID to trade	Medium		<ul style="list-style-type: none"> Scaling and management of complexity will require the rise of a few dominant players, who will need to be carefully governed/regulated The more private the solution, the less precise/more probabilistic it becomes Strategic dependence on third-party 	No
	Browser based solutions	Browser highlights characteristics of a site (e.g. key focus, topics of conversations) to allow buy-side to target the site	Low		<ul style="list-style-type: none"> As audience matching likely to be done at the domain level, provides a low level of granularity Publisher unlikely to have access to browser data 	Too early to tell

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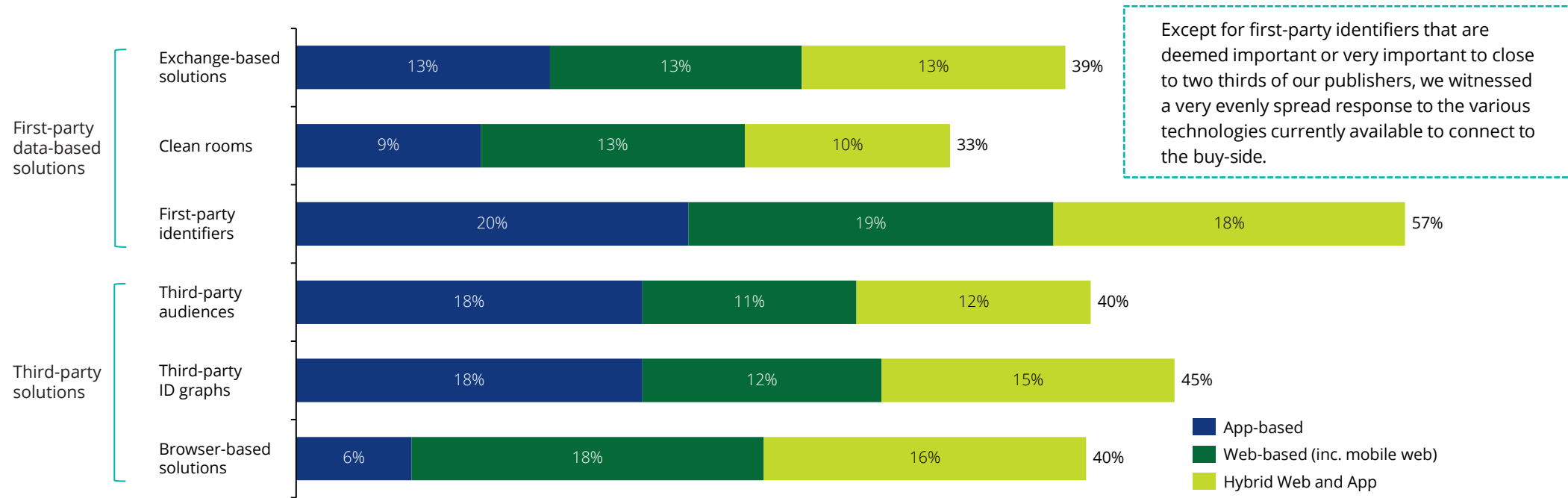
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No one-stop shop solution

In light of these challenges, it is not surprising that there is no consensus on what solution will prevail across the APAC region.

How important to your Ad Sales effort do you expect the following **Ad Sales solutions** to become in a privacy-centric future?
 (Aggregated response of "Important / Most Important")



“The fact that no one solution has emerged as the standard makes it harder for us to define our strategy.”

Leading Japanese publisher



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AdTech yet to scale

Though all solutions are readily available to players across APAC and awareness of options is clearly quite high, our research points to a distinct lack of Ad Tech innovation across the region for the reasons we highlighted in Chapter 1.

In fact, market leaders advised that all innovation was not worth pursuing, recommending instead that all players “not get distracted by all the tech”, **focus on a few key solutions** and get to know their tools so they can make the most out of them.

This, of course, does not mean that experimentation is not taking place, especially across New Zealand, Japan, Singapore and Australia.

“First party Advertiser targeting solutions have a place, but we need to see greater uptake!”

Large Australian publisher

APAC adoption

First-party identifiers: a great way to pass on first-party signals to the buy-side

Publishers and some app developers are regularly passing [Publisher Provided IDs](#) (PPIDs) to the buy-side to help drive matching of proprietary audience segments on its sites. Preserving privacy and making the most of first-party data to drive differentiation, this approach can be scaled with a relatively low level of technical sophistication. Data collection and segment creation through analytics tend to be the key barriers to adoption.

3P ID graphs: A temporary solution?

Publishers keen not to lose some of the audience matching ability provided by third-party cookies are experimenting third-party ID graphs, often working with more than one provider. Interestingly, some claimed to be using them as a temporary solutions until either a preeminent solution arises or their first-party data-based tools are ready for use. Players keen to allow advertisers to match individuals (rather than cohorts) through open-market programmatic trading, were particularly interested in trialing these solutions.

Clean rooms: A bilateral solution for top advertiser relationships?

Reserved for those with a direct relationship with advertisers and agencies, clean rooms offer an environment where publishers and advertisers can match proprietary data sets, including PII, to match audiences without compromising privacy. All data is fully encrypted and neither party is able to view the other’s information.

Based on our research, this approach is primarily used in APAC’s most advanced markets, like Australia, and by its most sophisticated players, able to build the data management and analytics capabilities required to operate such tools.



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Where app and web roads diverge... for now!

One group that seems to have taken this advice to heart are app players. Focusing on a limited set of tools across data collection, segmentation and user acquisition, they have minimized the complexity of their ad sales efforts by relying on a small set of **mediation platforms that automate most of the audience matching process for them without requiring the use of any first-party data.**

Rather than creating first-party segments, they differentiate based on the number of demand-side partners they integrate with and through trading tactics emerging from extensive experimentation.

This being said, we did talk to a couple of highly innovative app developers that had embraced a privacy-centric, first-party data-based approach to ad sales. Like leading publishers, these players seek to differentiate based on the quality of their first-party audiences.

It is too early to tell, but should they prove successful, we are likely to see a convergence of tactics across app and web players as the ecosystem grows in both sophistication and privacy maturity.

Case studies

Driving ad sales performance using mediation tools

Most App developers we spoke to across APAC relied on mediation tools such as AppLovin's MAX, Ironsource's Unity and Google's AdMob to manage their connection to the buy-side and drive what is still their primary revenue stream. One of their key priorities has been to integrate with a growing number of demand-side partners without compromising on user experience and ad loading speed. They also take great care in avoiding conflict across mediation platforms and bidding strategies (e.g. waterfall vs. real-time bidding), segmenting inventory across each platform and strategy. Indeed, as highlighted by a leading Australian publisher, "especially since the advent of first-price auctions, you run the risk of bidding against yourself!" As a result, this player recommended selecting a few core partners based on the quality of their technology, access to buy-side demand and customer support. In their mind, this approach not only minimizes complexity, it also allows for deeper integration and better negotiating power with mediation platforms. Breadth vs. depth: the choice is yours.

Driving ad sales growth through first-party data - Lessons from a Chinese app developer

Understanding that "reliance on third-party data would no longer be viable beyond the withdrawal of support for third-party cookies", a Chinese app developer chose to invest in its own first-party data capability across its DMP and internally-developed cloud-based CDP, with a strong focus on driving registration and data augmentation using third-party data and look alike modeling.

Keen to make more of this first-party data in advertising, it chose to use an ad exchange rather than the traditional mediation platform used by app-based competitors. A first-party identifier, which it passes to the buy-side through its ad exchange, underpins a rich, deeply embedded data collection journey fueling much more precise audience matching... and a healthy path to sustainable, profitable, organic growth in a privacy-centric future.

"We believe our best path to growth is through user acquisition and product development... that is where we will leverage first-party data."

Majority of APAC app developers



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Chapter 04

Winning through first-party data



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Building advantage through first-party data

While the benefits of first-party data reach far beyond advertising, our research identified five ways leading players are leveraging first-party data to keep and build on their competitive position in ad sales.

Of course, these five moves supplement a large set of tactics, such as floor pricing to increase CPM or demand aggregation, that are prevalent across APAC.

Five ways to supercharge ad sales growth

- 1. Fuel more effective audience matching
- 2. Build a more direct relationship with the buy-side
- 3. Optimize ad placement
- 4. Drive user acquisition
- 5. Unlock new forms of monetization



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Fuel more effective audience matching

When it comes to advertising, the primary benefit of collecting first-party data is the ability to create audiences that can fuel more relevant audience matching in a privacy-preserving manner.

Unfortunately, only the most advanced players in APAC seem to be leveraging this powerful tool to its full potential, passing first-party signals to the buy-side through their ad exchange and using first-party identifiers.

At the same time, while jumping to the most advanced use cases can be alluring, starting small (e.g. using “natural segments” like geographies or languages) before delivering more advanced use cases may yield the highest ROI, especially in markets still making their way up the maturity curve.

Similarly, players across the app and web landscape have found great success building segments based on on-site behavior. Another privacy preserving low hanging fruit some are yet to grasp.

Case studies

Building audiences at scale - Two different approaches in the Indian market

Building out meaningful proprietary audience segments without third-party data can seem daunting. Indeed, it does require some investment in data collection, preparation, storage, analysis and activation.

At the same time, once a basic foundation is in place, the ability to segment can be leveraged at scale almost instantly. As a result, a leading Indian publisher was able to create more than 200 meaningful audience segments in a mere 1.5 months.

Not all players have found it necessary to reach this level of sophistication. A social network in India is merely seeking to identify and validate “natural segments” based on common attributes such as location (from primarily mobile audience), income (based on phone used), language, interests and gender that can be derived through analysis of readily available data, on-site behavior and probabilistic models. All that was required was a modest increase in operating expense to recruit a small analytics team and to upskill the ad sales team.

Rewarded ads - New privacy-safe source of revenue for app developers

Rewarded ads is an innovative solution that involves remunerating a user (usually with in-game or other non-cash benefits) for viewing ads. As ad viewing is triggered by the decision to watch the ad, these ads do not require sophisticated audience matching, making it possible to drive demand without plentiful access to first-party data.

Many game developers we spoke to have embraced this new type of inventory, sometimes integrating it with “regular” ads. Multiple app developers even mentioned that it was fast becoming their primary revenue stream.

“It does not have to be sophisticated to be effective! Focus on core segments: for most publishers 10% of users contribute 80% of revenue!”

APAC digital advertising agency



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Develop a more direct relationship with the buy-side

In addition to making the right audiences available to the buy-side, many players stressed the importance of **building a more robust commercial approach**.

As a leading Indian player put it: “We have become so dependent on Ad Tech tools that we have forgotten how to sell!”

To that effect, many mentioned efforts to build direct sales teams to strengthen their relationships with the buy-side.

Similarly, for those lucky enough to have these capabilities in place, the focus was on shifting to **more private ways of trading with the buy-side**: Programmatic Guaranteed (PG) and Private Marketplaces (PMP), especially to sell their most premium inventory, like video or rich media banner ads.

Having, at times, found it difficult to meet sufficient demand through these more private trading mechanisms, they are now focused on **optimizing inventory allocation across trading approaches**.

Even at the top end of the ecosystem, it seems too early to call the demise of the open market.

Case studies

Benefits and risks of Programmatic Guaranteed (PG) and Private Marketplace (PMP) deals

With advertisers reporting eCPMs **15-20x higher than those captured through average open market trading**, it is not hard to see the allure of more private forms of trading like Programmatic Guaranteed and Private Marketplaces.

Indeed, such arrangements help to cement the **intimacy of direct relationships with advertisers and agencies**.

This benefit does come at a price however, with multiple respondents highlighting **challenges with fulfilling offline deals at the risk of incurring penalties**.

The foundations of a more private relationship

Around the world, we have heard the story that PG and PMP tend to be reserved for premium publishers.

While it is true that a premium content proposition is a major asset in capturing the attention of advertisers and agencies, experts we talked to highlighted two other levers that can help build a closer relationship with the buy-side:

- 1 Build a **direct sales team** with agency relationships and/or an ability to discuss topics that are top of mind with your clients (e.g. campaign delivery, emerging techniques and technologies, privacy).
- 2 Enhance the **quality of inventory** through a mixture of decluttering, focus on higher viewability and premium ad formats, such as rich media banners and video.
- 3 Leverage **first-party data** and **your analytics team** to engage in a different conversation with the buy-side around audience-based ad products and joint data-based experiments (e.g. data sharing through clean rooms, privacy-preserving technology testing).

Going direct is a choice, not the privilege of a few.

“The only interface we have with the buy-side is the aggregated network data we see in our mediation platform.”
Chinese app developer



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Leveraging first-party data in ad sales and investment timing

In the absence of clarity on how the APAC ad sales ecosystem will evolve over the coming years, it can be hard to make the decision to invest in first-party data-based solutions.

Third-party solutions can, at first glance, appear to provide simpler, more readily available solutions requiring lower capex.

On the other hand, these solutions hand over many levers of ad sales success (e.g. first-party data, control over metrics, choice of identifier) to a third-party.

More importantly, they also deprive sell-side players of many of the benefits of first-party data, not least the opportunity to create unique audiences or to share data with key buy-side players to build an ever closer relationship with them.

Many third-party solutions also require sharing user data, including hashed personal identifiable information with third parties, which some players may not be comfortable with.

Low speed to market and investment vs. substantial investment in a long-term differentiating asset... Not an easy call to make.

Similarly, as discussed, incentives to invest in ad sales sophistication vary greatly across markets as does the capacity to do so across players.

In this context, **the majority of players we surveyed have chosen to time their investment in line with these incentives.**

Interestingly, **a few players in the very same markets have chosen to invest early in order to be in a position to differentiate once planned privacy changes materialize.**

Based on our conversations with them, the decision to embrace this bold strategy was based primarily on:

- 01 Their experience in more privacy-centric markets
- 02 The knowledge of how long it can take time to develop the capabilities required to achieve privacy readiness
- 03 Deeply-embedded customer centricity

“It is all a big assumption that our data will be valued and drive returns for advertisers, and that the value and price they pay, will allow us to generate ROI on our significant investments in infrastructure.”

Australian publisher



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Leveraging first-party data in ad sales and investment timing

Investing early - A matter of conviction

In geographies like India and Pakistan, where the rise of privacy in all its forms is still in its infancy, leading players are making bold moves to differentiate based on their approach to privacy. The examples below illustrate how market context does not have to drive strategy.

Case study #1

Building user confidence and trust through privacy

A leading Indian news broadcaster rolled out a GDPR-compliant approach on its websites back in 2018, even before the draft Personal Data Protection Bill was tabled in the Indian Parliament. Observing developments in other countries, and aware that its audience reach may include users from more privacy-centric markets, they recognized that privacy would become more of an issue back home and started to take action.

To this end, the company brought in privacy experts to help accelerate its privacy journey, input consent forms on its website (despite there being no Indian legal requirement to do so) and allowed users to contact them directly over any concerns regarding the use of their personal information. It also put in place the first-party data capabilities required to face the upcoming withdrawal of support for third-party cookies. According to their CEO, this was done out of a conviction that, “without privacy, users will lose confidence”.

Case study #2

Privacy in the service of delighting customers

Out of a belief that privacy should not be sacrificed for short-term commercial gains, an app developer in Pakistan refrains from collecting unnecessary data (such as gender), preferring to focus on location-based audience matching. Using plain language, it also seeks to be as transparent as possible about how it collects and uses data.

Believing that “long-term success depends on customer happiness”, this player is willing to suffer a “short-term drop” in the service of its “long-term drive” to delight customers. Indeed, it has a track record of such customer-centric moves, having voluntarily suffered a short-term drop of 20% in ad revenue advertising as it pushed to reduce advertising clutter in response to customer complaints. Satisfaction ratings soared (from 3.4 stars to 4.3 stars on app stores) and revenue now exceeds pre-decluttering levels.



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Four strategy archetypes

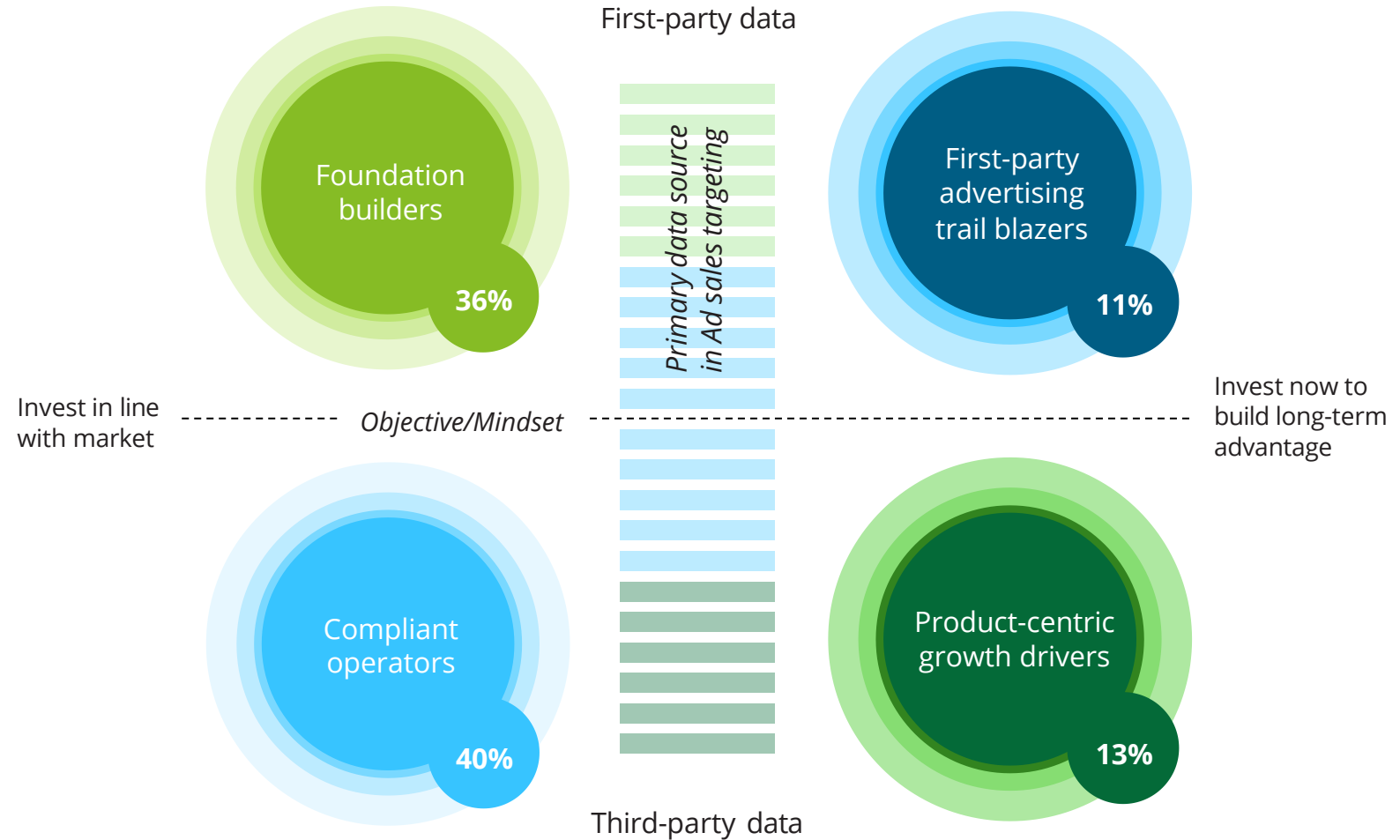
While we witnessed a broad range of approaches, our research did highlight four sell-side strategy archetypes, each with its own set of technological solutions, based on the two key questions we have just articulated:

- 1 To primarily use first or third-party data in audience matching
- 2 To invest in line with the market or to invest now to build long-term advantage

Four personas highlighted by our research:

- 01 Compliant operators
- 02 Foundation layers
- 03 Product-centric growth drivers
- 04 First-party data advertising trail blazers

In the face of uncertainty, APAC sell-side players we surveyed claimed to be making very different strategic choices.



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Four strategy archetypes

The four archetypes reflect profound differences across players and markets... and may determine their technology choices.

Strategy	Adopter characteristics	Preferred technologies to connect to the buy-side
Foundation builders <ul style="list-style-type: none"> • Time investment in capabilities to maximize short-term ROI • Proactively collecting first-party data • Experimenting with audience matching • Trialling AdTech solutions 	<ul style="list-style-type: none"> • Aware of the need to invest in first-party data and analytics capabilities to retain competitiveness in a privacy-centric future • Keen to only invest once potential for short-term ROI has materialized • Looking for temporary solutions until first-party operating model is in place, even if that means sharing hashed personal data with third parties 	<ul style="list-style-type: none"> • Ad exchange-based • First-party identifiers • Third-party ID graphs and, potentially, browser-based solutions (as temporary solutions)
First-party advertising trail blazers <ul style="list-style-type: none"> • Invest(ed) in strong first-party data foundations to fuel audience matching • Constantly pursuing new creative and innovative approaches to collecting and leveraging first-party data • Use third-party solutions to access supplementary demand 	<ul style="list-style-type: none"> • Focused on advertising as a major pillar of business model and growth driver • See privacy and first-party data as a way to differentiate in the market • Strong access to first-party data • Desire to retain control of their destiny by establishing in-house data and analytics capabilities • Highly creative and innovative in their use of technology to drive growth • See third-party solutions as a supplementary way to access demand 	<ul style="list-style-type: none"> • First-party data-based solutions • Third-party ID graphs (to supplement demand only)
Product-centric growth drivers <ul style="list-style-type: none"> • Happy to rely on exchange-based solutions to drive ad sales • Leverage first-party data to drive UA and product development only • Exploring alternative monetization strategies 	<ul style="list-style-type: none"> • Believe product development and UA will be primary drivers of growth • Strong access to first-party data • High digital and data maturity with in-house data and analytics capabilities • Dedication to privacy, including by avoiding sharing hashed personal data • Desire to retain control by establishing their own in-house data and analytics team 	<ul style="list-style-type: none"> • Ad exchange-based • Third-party audiences
Compliant operators <ul style="list-style-type: none"> • React to market changes as they occur, starting with regulatory compliance • Exploring alternative monetization strategies 	<ul style="list-style-type: none"> • Low level of digital and ad sales maturity, with strong focus on legacy businesses • Hoping for dominant third-party solution to emerge • Focus on compliance to regulation and platform policy updates • Willing or needing to trust third-parties with first-party data, including with hashed personal data • Primarily focused on cohort matching 	<ul style="list-style-type: none"> • Third-party solutions



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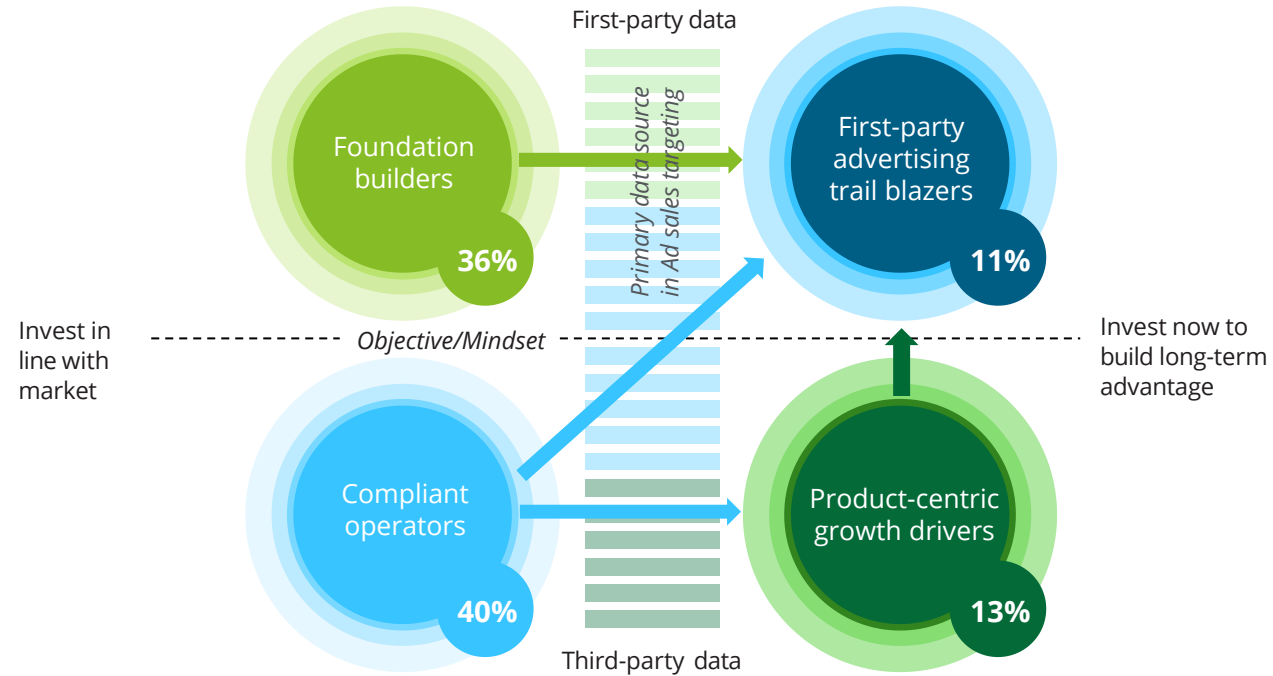
Four strategy archetypes

Based on our research around the globe, we expect significant strategic migration as the APAC region matures.

This maturity will come about in three ways:

- 01 Once Foundations Builders complete their investment in underlying capability, they will naturally attempt to roll out more sophisticated use cases, including the sale of more sophisticated first-party audiences
- 02 As we are already witnessing Product-centric Growth Drivers will “take the plunge” and invest in first-party data-based capabilities to differentiate in ad sales
- 03 Compliant Operators will “get off the fence” and start investing more aggressively to catch up and even leapfrog competitors

To be sure, timing will vary greatly across players and geographies, but one thing is for sure: **Status quo is simply not an option.**



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Peeking into a first-party trail blazer's future?

Finally, First-Party Trail Blazers will continue to build and capitalize on their differentiating access to data.

To understand how they might do so, we studied moves by APAC leaders as well as the most striking contrasts between our research in APAC, Europe and the Americas.

Though it can be ill-advised to extrapolate observations from one market to another, this approach highlighted three areas that some First-Party Trail Blazers may focus on:

- 1 Collecting transactional data
- 2 Insourcing data capabilities
- 3 Advanced analytics

At the very least, it seems likely, based on our research, that many global players will bring these capabilities and practices to APAC and, in so doing, influence the shape of the region's digital ad sales ecosystem.

Hypothesis #1

Collecting transactional data

Around the world, e-Commerce players are investing in digital advertising capabilities.

Fueled by plentiful first-party data about (often registered) user preferences, these players are capturing a growing share of ad spend aimed at converting prospective customers into buyers.

These players' ability to connect advertisers, in real time, to users who, through their behavior (e.g. watching an item or putting it in their basket), have shown an interest in their products, has caught the attention of leading publishers around the globe.

As a result,

- leading Australian publishers are partnering with their retail counterparts to create a competing offers in this space
- an Indian publisher leveraged its e-Commerce parent to source transactional data about its users
- a Brazilian broadcaster created shoppable content as a means of enriching its audience data model with commerce-related data points.

The lines between digital commerce and advertising are clearly being redrawn.

“We offer advertisers intent in context, in real time, happening now, not 30 days ago.”

Canadian e-Commerce marketplace



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Peeking into a first-party trail blazer's future?

Hypothesis #2

Insourcing data and ad sales capabilities

One of the major trends we encountered in Europe and the Americas is the insourcing of the capabilities underpinning ad sales campaign delivery from CDPs to analytical and campaign management teams.

Fueled by a desire to differentiate based on the sophistication of their ad sales approach and the quality of their first-party data, these players have put these capabilities at the heart of revamped go to market strategies. For example, to build ever closer buy-side partnerships, they bring data scientist to the client meetings and share data with brands through clean rooms.

Some are also starting to offer their services to less sophisticated players in their markets, **turning their businesses** into platforms and, in so doing, diversify their revenue base.

Will leading players in APAC follow a similar path?

"I think that it has almost become a necessity to own the relationship with the customer, own your customer data platform and own the ways that you connect with third parties."

Global, US-based publisher

Hypothesis #3

Building data advantage through analytics

Machine learning is allowing players around the world to create entirely new advertising products from **audiences engaging in "conversations that matter"** to mood-based audience matching using **semantic analysis of content** and reactions.

It is also allowing players to connect to the buy-side in innovative ways including **"blind joins"** in clean rooms, that match buy-side first-party data (e.g. CRM lists) with sell-side data (e.g. viewing behavior, identifiers) without either party seeing any of the data and without data ever changing hands.

Similarly, a US publisher with very little ability to drive registration was able to use advanced analytics to turn behavioral data into a **"synthetic" first-party** identifier that summarizes all it knows and can infer about a user without actually identifying the user. It now routinely passes these first-party signals to the buy-side through its ad exchange, driving yield across its platform.

The sky, it seems, is the limit, when it comes to analytical sophistication.

"Third-party cookies may go away, but third-party data is here to stay."

Global, US-based publisher



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Chapter 05

Making progress on your privacy journey: The time is now.



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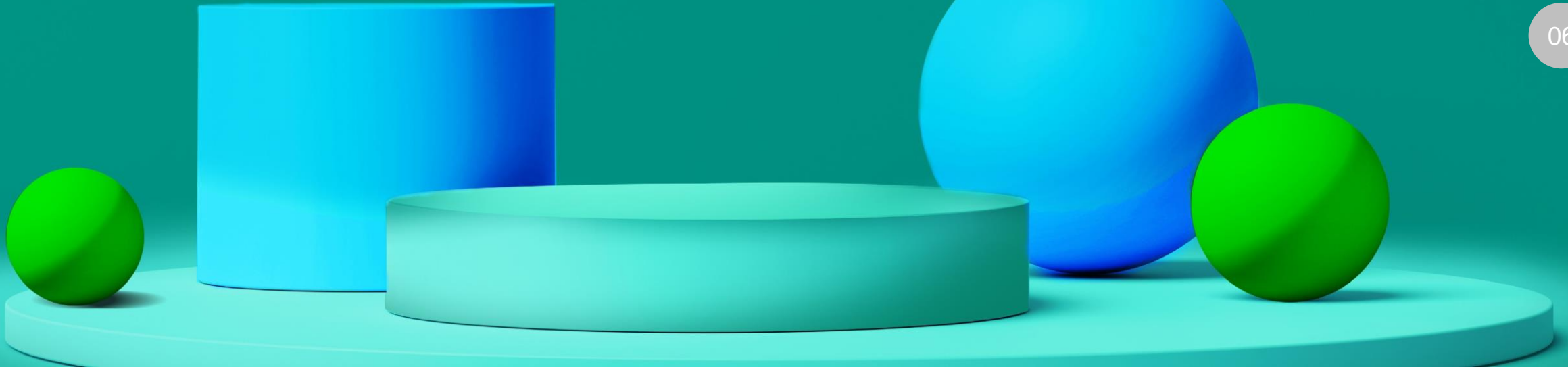
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Stay abreast of developments

Google's decision to delay the withdrawal of its support of third-party cookies in Chrome and the time left before changes to the Android AdID have given players who are yet to progress their privacy readiness journey an opportunity to catch up.

At the same time, with respondents reporting years spent in dialogue with internal stakeholders, selecting and procuring the right capabilities, developing the right use cases for their data, **the changes are really around the corner.**

If you have not done so, we therefore strongly encourage you to **get up to speed with and keep abreast of both technological and legal developments impacting privacy in your markets.**

The good news is that, even excluding M&A, **investment in marketing and advertising technology innovation exceeded \$7.8bn in Q1 2021 alone**, according to [ExchangeWire's Investment Report](#)¹.

A new solution that fits your needs may already be in development.

Making progress on your privacy journey:

- 1. Stay abreast of developments
- 2. Understand how privacy impacts you
- 3. Join and shape the conversation
- 4. Lead from the top
- 5. Experiment at scale
- 6. Make it a company-wide effort
- 7. Never walk alone
- 8. Partner for success?
- 9. Don't delay!

1. Source: ExchangeWire (Investment Report Q1 2021).



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Understand how privacy impacts you

Regardless of where you are on your privacy journey, **it is essential that you take an honest look** at how privacy is impacting all parts of your business and your relationship with customers.

As mentioned, you are likely to find that legislation or the withdrawal of support for third-party cookies impacts all aspects of your business.

Privacy is not just about advertising.

Thankfully, there are tried and tested methods to gauge the way and extent to which you need to change.

“There is widespread ignorance of what needs to be done!”
APAC digital marketing agency

Ways to check how privacy impacts your business:

Know your history

Check drop in CPM from recent privacy changes

Benchmarking exercise

Compare CPMs or yield on different browsers or platforms

Readiness assessment

Work with advisors to understand how ready you are for upcoming changes

What is a readiness assessment?

Overview: A readiness assessment helps an organization paint a clear picture on where it stands in terms of:

- 1 regulatory compliance;
- 2 data maturity; and
- 3 technological sophistication,

as it builds its strategy to respond to the rise of privacy.

Step 01 - Assessment

Usually working with an adviser bringing a tried and tested methodology and a set of benchmarks to the exercise, the company identifies any gaps in its teams, data, systems, policies and processes to operate in a cookieless world with increased privacy regulation.

Step 02 - Quantification

The impact of each gap is then quantified, prompting focus on the most critical ones (e.g. loss of signals from cookies, regulatory compliance).

Step 03 - Roadmap development

Based on the above, a set of tailored, practical and prioritized recommendations on how to close key gaps over time are highlighted and turned into a clear roadmap.



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Join the conversation

The future of privacy is still being written. As a result, all parts of the ecosystem from the sell-side to the buy-side to regulators to Ad Tech providers are still grappling with what privacy means for them.

This is a **“once-in-a-generation opportunity” to shape the future of your ecosystem. Don’t miss out!**

The Privacy Sandbox:

A forum where the future of advertising is forged

The Privacy Sandbox aims to “improve web privacy for people around the world, while also giving publishers, creators and other developers the tools they need to build thriving businesses.”

In line with its [announcement](#) that it would not withdraw its support for third-party cookies before it has found a workable alternative, Google is working in partnership with players from across the ecosystem to build “new digital advertising tools to replace third-party cookies with alternatives that better protect customer privacy and preserve people’s access to free content online.”

It has become an important forum for those keen to engage in conversation about the privacy-centric future of advertising.

In that context, thousands of ad sales, tech, marketing and tech specialists have been engaging in conversations with tech providers to shape the platforms that will underpin digital ad sales and preserve privacy for years to come.

In the same spirit, a couple of Japanese publishers we spoke to reported working with their regulator to define the best interpretation of the recently-published privacy law.

“We asked advertisers about their plans and they said, ‘What are you going to do?’ ”

New Zealand publisher



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Lead from the top

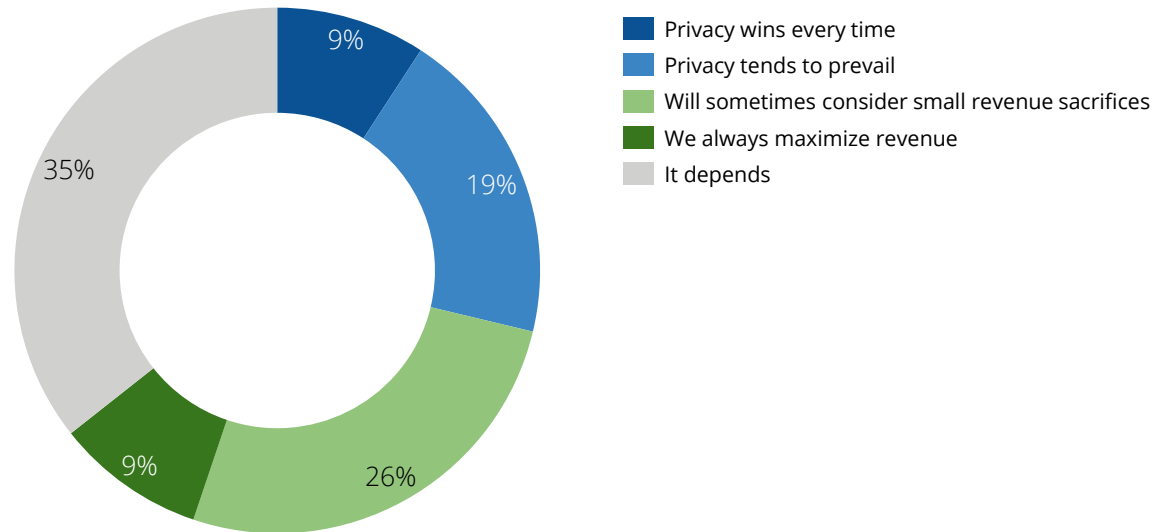
Thriving in a privacy-centric ad sales ecosystem requires a sustained effort and investment, which can be challenging given company resolve can often be challenged by competing investment priorities and/or commercial imperatives.

In order to make progress, respondents have repeatedly, and in line with global peers, stressed the importance of senior leadership support in “taking the leap” and staying on course.

With 35% of respondents reporting prioritizing commercial goals over privacy most of the time, building buy-in and understanding in the leadership team is clearly a key step in setting up a successful privacy journey.

Doing so in a way that emphasizes customers and the best approach **to earning and retaining their trust** may help achieve increased focus and buy-in.

When preserving privacy conflicts with maximizing revenues, how does your organization decide?



“We are incredibly lucky to have a senior executive team that understands digital and the value of data within it.”

Large Australian publisher



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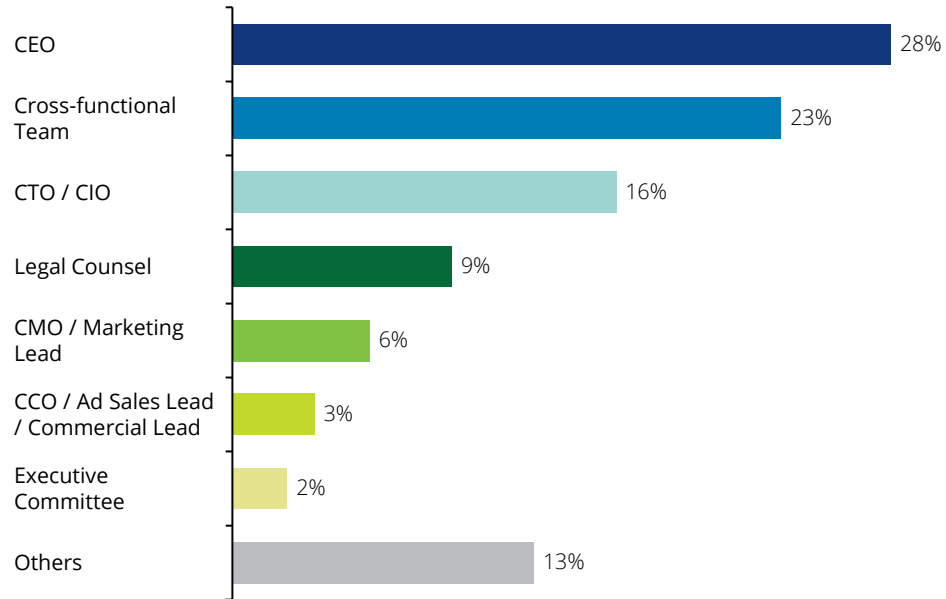
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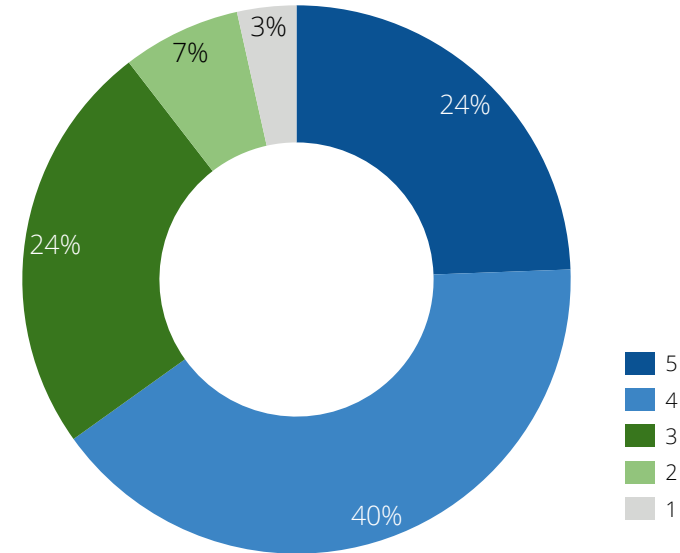
Lead from the top

Our research shows that the privacy journey can have many leaders and that most companies felt their management teams were up to the challenge.

Who is leading your company's response to privacy?



Do leaders in your organization understand the implications of the rise of privacy? (Please rate from 1 to 5, where 1 is "Not at all" and 5 is "Absolutely, in detail")



There is no hard and fast rule on who should lead the privacy journey.



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Experiment at scale

Regardless of how you decide to proceed on your journey, it is clear that, beyond laying the necessary foundations, **the path to success is not a straight line.**

All players we spoke to used A/B testing in every aspect of their business, from ad placement to user acquisition to data management to technology choices.

This approach allows players to test solutions and gain confidence in their effectiveness before investing at scale.

Indeed, given the relatively nascent ad market maturity of the APAC region, this approach seems particularly well-suited to the realities of the APAC region.

“It’s not about reaching the destination, the journey of continuous improvement never ends.”

Chinese game developer

Case studies

Test first, then scale

A Singaporean publisher used a robust A/B testing approach to gauge the attractiveness over 400 different audience segments. As tests showed a **2-3x increase in campaign efficiency and clickthrough**, it now has confidence to invest further in the systems and data collection required to make the most of its first-party data-based strategy and has set a **goal to triple audience-based ad sales revenue within a couple of years.**

A similar approach was used by a Japanese game developer to test rewarded ads and their impact on user engagement. This time, however, the test was conducted on 100% of users, albeit on a small set of inventory. Within a month, results were so promising that the company scaled its test, achieving a **3x increase in ad sales revenue in its home market.**

Meanwhile, an Indian app developer used a subset of its users, amounting to 1-5% of its total audience, to test the most attractive location-specific cohorts. “Failing many times and scaling only a few audiences”, it used these experiments to **“keep the conversation with agencies going”** as it implemented a two-year campaign to change market perspective and drive willingness to pay for location-based matching.

Experiment with multiple technical solutions

A Japanese fintech platform is experimenting with six different identifiers while building its first-party data solution. Based on our research around the world, this is a common way for organizations to hedge their bets in the face of the uncertainty surrounding technological adoption.

Micro-experiments on the path to optimization

As shown by file-sharing app developer based in China, the same kind of experimentation can be used to optimize operations. In an effort to drive direct sales, this innovative player built a platform allowing advertisers to place direct orders and control audience matching on campaign through a set desktop tools. Advertisers were invited to test the platform and provide feedback for improvement. **Direct sales are now about 90% of total ad sales.**



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Make it a company-wide effort

The journey towards privacy readiness is a multi-functional effort. By its very nature it requires the involvement of data, commercial, marketing, product, legal and tech teams as well as a data privacy officer.

As a result, developing successful solutions requires engagement from many parts of the organization.

It also requires that **technical specialists** (e.g. tech, data, programmatic, legal) be put **at the heart of decision-making.**

Meanwhile, these technical specialists **cannot act as gatekeepers**, holding final sway on what does or does not end up being developed.

Rather, they would be well advised to work in close partnership with business leaders to **uncover the right questions**, which they can then take away and answer.

“Do not put specialists in a box.”

Singaporean publisher

Case studies

A cross-functional team to pilot the journey to privacy-centric success

Recognizing the wide-reaching impact of privacy on all parts of their business, a Chinese hybrid publisher built a cross-functional team to spearhead its privacy journey, with representatives from marketing, data, technology and product teams involved right from the start.

The team's core mission was to ensure that all employees had access to the data that they needed. At the heart of this approach, the data team has focused on sharing knowledge and “formulating the right questions with senior management” through monthly data workshops; all while completing the analytical work required to enable this widespread democratization. Armed with company-wide dashboards, teams across the company are now able to steer a wide range of revenue-driving activities from user acquisition to product development to monetization, while sharing the same version of the truth across all departments.

Making the most of Group capabilities and assets

To make faster progress on its privacy journey, an Indian app developer, which is part of a wider mobile advertising conglomerate, was able to leverage its parent company's access to intent data to create and enrich meaningful audience profiles that it makes available to the buy-side.

Similarly, an Australian publisher utilized its parent company's expertise in content creation to develop videos that focus on its core real estate vertical. It also combined its inventory with parent company inventory across display, audio and video ads to achieve a **10x increase in CPM.**



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Never walk alone

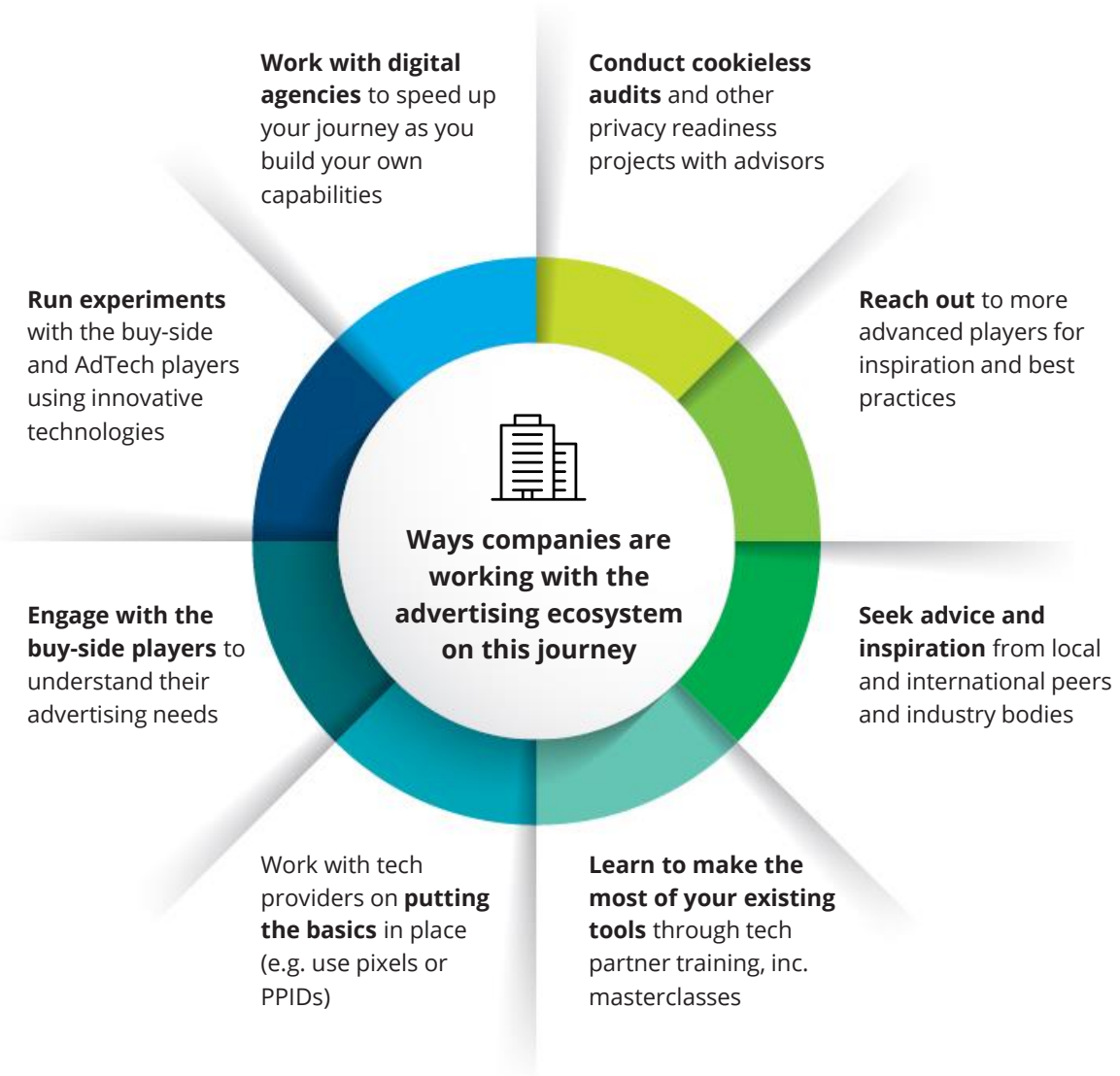
This emphasis on collaboration does not stop at the door of the organization.

We encountered many examples of players reaching out to peers, industry bodies, advisors or even technology providers for advice and support as they were progressing up the learning curve.

For example, **40% of respondents reported partnering more closely with Ad Tech providers** on their journey towards data maturity and privacy preservation.

In some cases, they met as often as bi-weekly to discuss upcoming updates, optimize performance and gather “outside in” insights.

As evidenced around the world, **the ecosystem is clearly evolving far too fast for sell-side players to go it alone**, so reach out... you will be amazed how partners are willing to help.



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Partner for success?

As we have seen in other geographies, one way to build scale quickly (both in terms of data availability and negotiating power), secure hard-to-find technical expertise and share the investment burden is to **join forces with other players in a specific market.**

Across APAC, the buy-side seems to have responded positively to the convenience such “exchanges” offer, leading multiple players we spoke to pursue dialogues with potential partners.

At the same time, as is always the case with joint ventures, **collaboration is not without its challenges**, especially in larger markets where large, established market positions stand in the way of prioritizing such ventures.

“We operate in a small market with few premium publishers, so it makes sense for us to come together and achieve scale.”

Large Singaporean publisher

Case studies

A tale of two partnerships

The Kiwi Premium Advertising Exchange (KPEX) was launched in 2015 as an alliance between four leading media companies in New Zealand. Entering as equal shareholders, the companies pooled their inventory to achieve scale and increased convenience for advertisers. Four years later in 2019, the KPEX was terminated, citing “changing market demands and shareholder priorities”.

Over in Singapore, the two leading media companies joined forces in 2018 to set up the Singapore Media Exchange (SMX), with a similar aim to deliver quality, data-based audiences at scale. Four years later, SMX is still going strong, with both players recognizing the importance of pooling their data and achieving scale in trading their video and banner inventories.

Both ventures met with strong buy-side response.

Based on our research, it seems the main differences between these two attempts to come together is their respective shareholders’ ability to agree and evolve clear objectives for the venture, including how they allocated inventory across KPEX and their own direct sales efforts.

Increasing the odds of partnership success

- Develop an attractive value proposition (inc. high-quality inventory)
- Achieve scale and market relevance from day one
- Align with partners on the purpose of the venture
- Allocate inventory between direct sales and partnership in a way that is not confusing for the buy-side



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Don't delay!

“Urgency has not dropped since the delay in third-party cookie deprecation.”

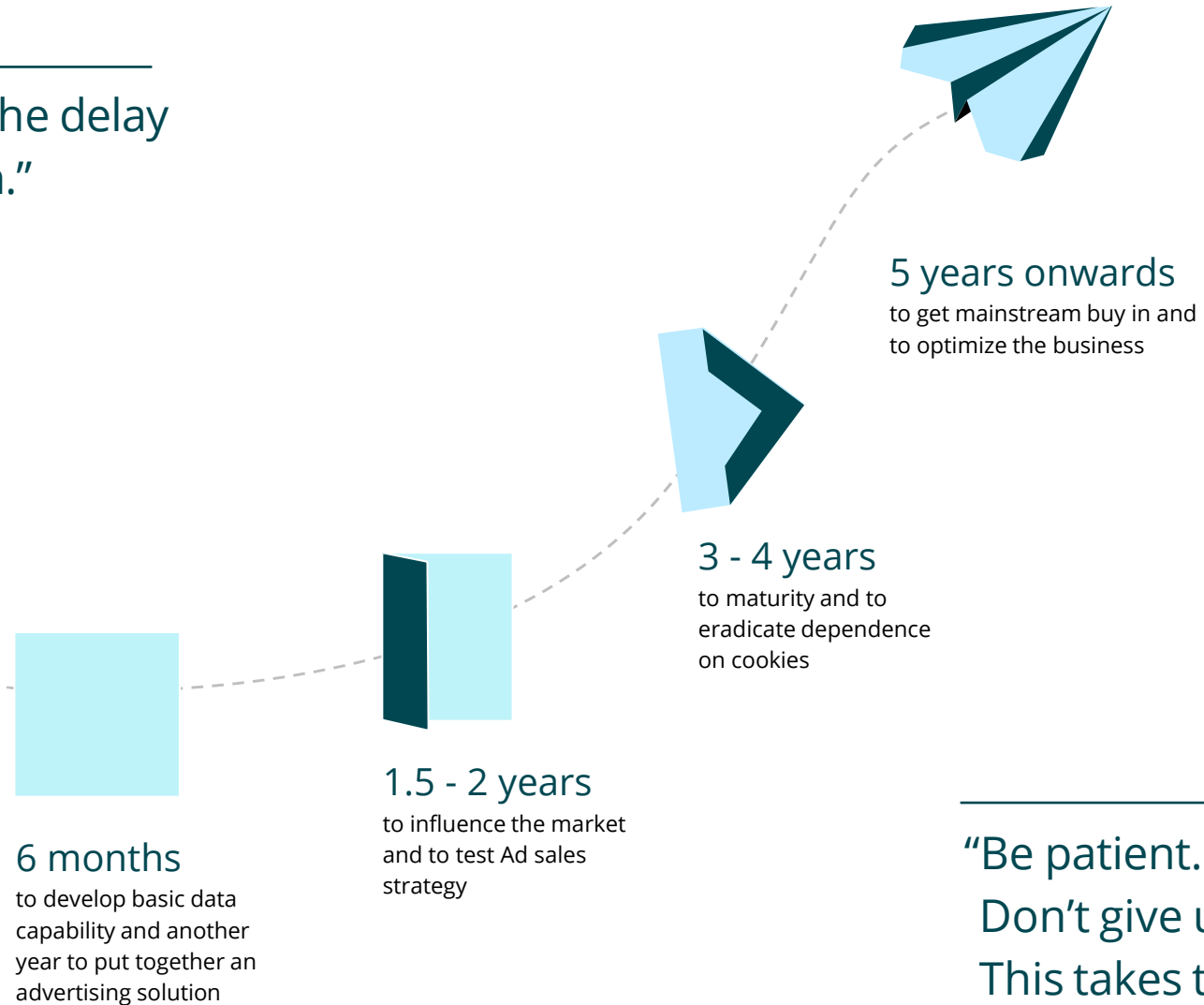
Leading Singaporean publisher

Much as APAC will be in a better position to catch up given the availability of tried and tested solutions from consent management platforms to Ad Tech as well as access to case studies from more privacy-centric markets, we were concerned when witnessing a certain passivity only months before major global platform changes are scheduled to take place.

No matter how “local players can be fast followers”, it was striking to see **how leading players are already forging ahead**, building what will likely become a significant competitive advantage in a privacy-centric era, **while so many are still waiting to start on their privacy journey.**

The journey towards privacy readiness can take years, so don't delay, and take action now.

There is simply no time like the present.



“Be patient...
Don't give up...
This takes time.”

Indian app developer



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Appendix

Methodology & market profiles



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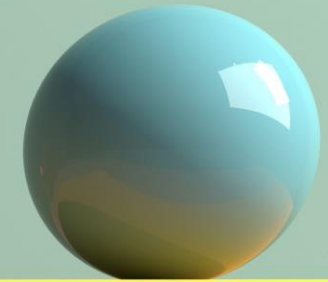
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Methodology

Context of this study

In partnership with Google, Deloitte conducted research, interviews and surveys to better understand the current APAC privacy landscape, seeking to uncover the general sentiment and to identify the solutions that have been adopted by publishers and app developers who have utilized Google and Deloitte's services in their Ad Sales business.

Research methodology

In the course of this study, the team adopted the following research methodology:

Primary research

Interviews and survey with publishers and app developers and privacy regulation experts

Secondary research

Review of privacy regulation and ad market drivers

Insights generation

Analysis of data research to derive insights

Insights validation

Discussion of findings with local market experts

Diverse range of perspectives

Our perspectives are shaped by input from a wide range of respondents, covering both publishers and app developers across APAC.

Interviews were conducted with: over 70 publishers / app developers in APAC

Survey gathered responses from: close to 90 publishers / app developers in APAC

Markets covered:

Australia	5
China	11
Hong Kong	4
India	24
Indonesia	4
Japan	11
South Korea	6
Malaysia	2
New Zealand	2
Pakistan	2
Singapore	4
Taiwan	5
Thailand	2
Vietnam	5

Publishers covered:

APP developers	31
WEB publishers	41
Hybrid players	16
<i>(Web and App businesses generate broadly equivalent revenue)</i>	

Interpretation of report insights

Given the nature of this study, the insights uncovered are primarily qualitative in nature, and should be interpreted with the following **guidelines** in mind:

- Given its qualitative nature, this report aims to **capture the essence of our findings rather than any statistically significant approximation of market reality.**
- **Any quotes** included in this report should be read as **reflecting the opinion of respondents**, in line with broader research findings
- **Figures stated should not be read as market generalization** (i.e., it would be inaccurate to state that: "X% of APAC companies believe...").
- It is important to remember that **APAC-wide findings hide very widely different** realities across APAC.



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Privacy awareness on the rise, but is yet to be embraced ecosystem-wide



Definition of Personal Info

Personal information refers to information or an opinion about an identified or reasonably identifiable individual, whether such information or opinion is true or not, and whether such information or opinion is recorded in material form or not.



Latest developments

The Australian Government recently sought feedback from stakeholders on proposals to strengthen Australia's privacy laws. Such proposals include:

1. Expanding the definition of personal information to include "technical data" and "inferred data".
2. Giving consumers the "right to erasure" in certain circumstances.
3. Strengthening consent requirements by requiring express and voluntary consent from individuals.

Key user rights



- Right to be informed
- Right to access
- Right of rectification
- Right to erasure ^(a)
- Right to object / opt-out / restrict processing ^(b)
- Right to data portability
- Right to object to automated decision making

Key processing obligations



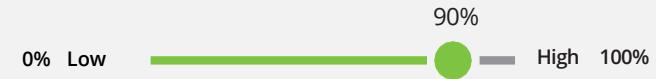
- Data transfer restrictions
- Data protection officer requirement ^(c)
- Data breach notification
- Data retention limitation



Key market stats



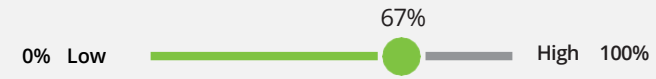
Internet Penetration¹



2021-2026 Digital Ad market CAGR²



Digital share of total Ad spend³



Privacy state of play

With 70% of Australians citing privacy as a major concern⁴ and given the significant impact of recent platform changes on ad sales performance, the importance of privacy is well established across the Australian ad sales ecosystem.

Though still not on par with Europe or the Americas, Australian authorities are contemplating legislation that could see the country lead the world in terms defining personal information.



Ecosystem response

The three largest players have built significant first-party data capabilities and are using them to differentiate from local competitors and global platforms, including through an ever closer relationship with the buy-side and by exploring a potential sell-side alliance.

Many others are following in their footsteps, including shaping future privacy regulation.

1. World Bank.
2. Source: Statista.

3. Source: eMarketer (2021d digital share).
4. Office of the Australian Information Commissioner.



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Definition of Personal Info

Personal information refers to information relating to an identified or identifiable natural person, whether recorded electronically or otherwise, but excludes information that has been anonymized.



Latest developments

In 2021, China passed the Data Security Law which came into effect on 1 Sep 2021, and the Personal Information Protection Law ("PIPL") which came into effect on 1 Nov 2021.

The PIPL is China's first comprehensive law on personal data protection, and new guidelines and standards may be released pursuant to the PIPL as the privacy space in China develops further.

Key user rights



- Right to be informed
- Right to access
- Right of rectification
- Right to erasure
- Right to object / opt-out / restrict processing
- Right to data portability
- Right to object to automated decision making

Key processing obligations



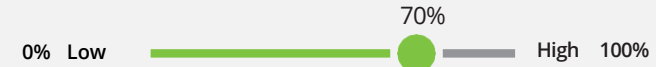
- Data transfer restrictions
- Data protection officer requirement
- Data breach notification
- Data retention limitation



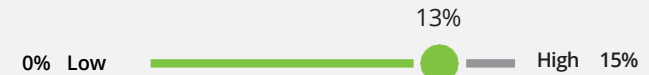
Key market stats



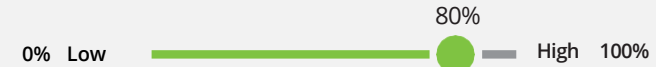
Internet Penetration²



2021-2026 Digital Ad market CAGR³



Digital share of total Ad spend⁴



Privacy state of play

Privacy regulation, focusing on a mix of personal data protection, cross-border data transfer constraints, content monitoring and network security is in place.

At the same time, platform mix and market growth have dampened the impact of recent platform changes.



Ecosystem response

Most players focusing on building first-party foundations and on experimenting with both ad sales tactics and new forms of revenue.

Core focus among app-based export players appears to be on the use of first-party data to improve products and to acquire users.

1. Study focused on export-focused app developers

2. World Bank. (2020) Internet penetration rate

3. Source: Statista.

4. Source: eMarketer (2021 digital share).



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Definition of Personal Info

Personal data means any data relating directly or indirectly to a living individual, from which it is practicable for the identity of the individual to be directly or indirectly ascertained, and in a form in which access to or processing of the data is practicable.

Key user rights



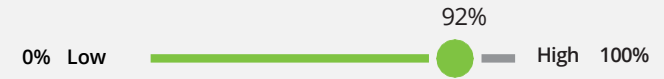
- Right to be informed
- Right to access
- Right of rectification
- Right to erasure ^(a)
- Right to object / opt-out / restrict processing
- Right to data portability
- Right to object to automated decision making



Key market stats



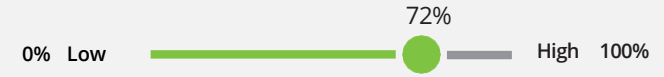
Internet Penetration¹



2021-2026 Digital Ad market CAGR²



Digital share of total Ad spend³



Privacy state of play

Strong consumer concerns around privacy, dominance of digital advertising, comprehensive privacy legislation and strong impact of recent platform changes all driving a very strong focus on privacy.



Ecosystem response

Strong ecosystem-wide response focusing on building first-party data infrastructure and retaining control of first-party data at every step of the ad sales activity chain.



Latest developments

Discussions on reforms to privacy laws have intensified, following a paper published in Jan 2020 by the Hong Kong Panel on Constitutional Affairs acknowledging that Hong Kong's privacy laws had to be modernized to keep up with the new challenges in protecting personal privacy.

More recently in July 2021, amendments to the Personal Data Privacy Ordinance were published to criminalize "doxing" activities.

Key processing obligations



- Data transfer restrictions ^(b)
- Data protection officer requirement ^(c)
- Data breach notification
- Data retention limitation

1. Source: World Bank (2020 internet penetration rate).
2. Source: Statista.

3. Source: Dentsu (2021 digital share).



Definition of Personal Info

Personal information means any information that relates to a natural person, which either directly or indirectly, in combination with other information available or likely to be available to a body corporate, is capable of identifying such person.



Latest developments

Since the landmark judgment in 2017 by the Supreme Court recognizing privacy as a fundamental right, draft privacy legislation in the form of the Personal Data Protection Bill has been proposed in Parliament but has yet to take effect as law.

Most recently in Dec 2021, a Joint Parliamentary Committee proposed a revised Bill, naming it as the Data Protection Bill to capture the wider scope of the proposed privacy law.

Key user rights



- Right to be informed
- Right to access
- Right of rectification
- Right to erasure[#]
- Right to object / opt out / restrict processing
- Right to data portability[#]
- Right to object to automated decision making

[#]: To be included under draft privacy legislation.

Key processing obligations



- Data transfer restrictions
- Data protection officer requirement[#]
- Data breach notification
- Data retention limitation

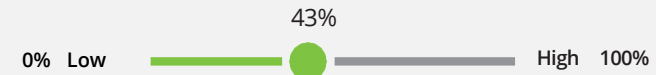
[#]: To be included under draft privacy legislation.



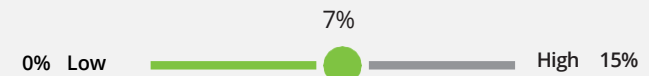
Key market stats



Internet Penetration¹



2021-2026 Digital Ad market CAGR²



Digital share of total Ad spend³



Privacy state of play

Customer concerns limited to the most sophisticated users in large urban centres. Draft privacy bill tabled four years ago, yet to pass into law.

Despite the existence of a vibrant local digital ecosystem, ecosystem focus on privacy is being delayed due to factors such as (i) the resilience of non-digital sell side players, (ii) minimal penetration of app operating systems asking users to opt in to data collection, and (iii) a market which is primarily app-based.



Ecosystem response

Two-tier response to privacy with a few leading players (mostly driven by their experience in more privacy-centric markets) investing in first-party data capabilities through a trust-based relationship with users, while the majority of players are yet to take action.

1. Source: World Bank (2020 internet penetration rate).

2. Source: Statista.

3. Source: eMarketer (2021 digital share).



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1 Limited privacy impact

Ad market and platform dynamics limiting focus on privacy



Definition of Personal Info

Personal data refers to individual data that is stored, maintained and accurate. A further definition is provided for certain data of an individual, which is any information that is correct, actual and can directly or indirectly identify an individual. ^(a)



Latest developments

The Personal Data Protection Bill was introduced in 2020, and would become Indonesia's first set of consolidated privacy law if implemented, setting out user rights and data processing obligations similar to that of the EU's GDPR.

The Bill is yet to be enacted (with the House of Representatives aiming to ratify the Bill in August 2022), and Indonesia's privacy laws are still currently governed by a multitude of laws and regulations, such as IT and electronic transactions regulations.

Key user rights



- Right to be informed
- Right to access
- Right of rectification
- Right to erasure
- Right to object / opt out / restrict processing
- Right to data portability[#]
- Right to object to automated decision making[#]

[#]: To be included under draft privacy legislation.

Key processing obligations



- Data transfer restrictions
- Data protection officer requirement[#]
- Data breach notification
- Data retention limitation

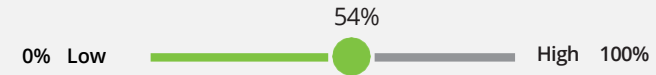
[#]: To be included under draft privacy legislation.



Key market stats



Internet Penetration¹



2021-2026 Digital Ad market CAGR²



Digital share of total Ad spend³



Privacy state of play

Draft privacy bill, with ambition to match GDPR and tabled two years ago, yet to pass into law.

Low maturity of the digital, mostly app-based advertising ecosystem and platform mix hindering ecosystem focus on privacy.



Ecosystem response

Very limited sell-side response, beyond nascent foundation-building.

Focus slowly increasing as broader platform changes approach.

1. Source: World Bank (2020 internet penetration rate).

2. Source: Statista.

3. Source: eMarketer (2021 digital share).



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Definition of Personal Info

Personal information refers to information about a living individual, from which the identity of the individual can be ascertained. This covers: (i) information enabling the identification of a specific individual with reference to other information, and (ii) "personal identifier codes".



Latest developments

Amendments to the Act on the Protection of Personal Information ("APPI") came into effect on 1 Apr 2022, introducing key changes and tightening Japan's privacy laws.

For example, the amended APPI introduces the concept of "*personal-related information*", which covers information that relates to personal matters but does not fall within the definition of "*personal information*", such as browsing history collected by cookies and location data.

Key user rights



- Right to be informed
- Right to access
- Right of rectification
- Right to erasure
- Right to object / opt out ^(a) / restrict processing
- Right to data portability
- Right to object to automated decision making

Key processing obligations



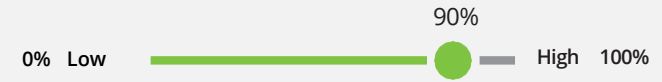
- Data transfer restrictions
- Data protection officer requirement
- Data breach notification
- Data retention limitation



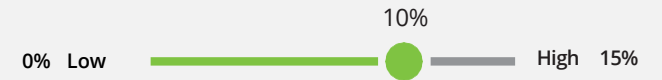
Key market stats



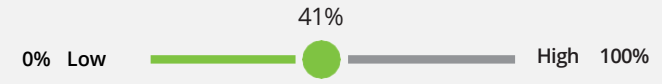
Internet Penetration¹



2021-2026 Digital Ad market CAGR²



Digital share of total Ad spend³



Privacy state of play

Rising consumer awareness, recent legislation and a strong impact of recent platform changes is driving a growing sell-side focus on privacy.

At the same time, digital's relatively low share of total ad sales is allowing players to take their time in formulating their response.



Ecosystem response

Building first-party data capabilities and experimenting with new technologies (e.g. third-party ID graphs).

Collaboration between leading publishers is also being considered.

1. Source: World Bank (2020 internet penetration rate).

2. Source: Statista.

3. Source: eMarketer (2021 digital share).



Definition of Personal Info

Personal data refers to information that relates directly or indirectly to a data subject, who is identified or identifiable from that information or from that and other information in the possession of a data user.^(a)

Key user rights



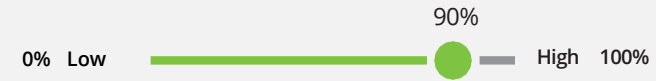
- Right to be informed
- Right to access
- Right of rectification
- Right to erasure
- Right to object / opt out / restrict processing
- Right to data portability
- Right to object to automated decision making



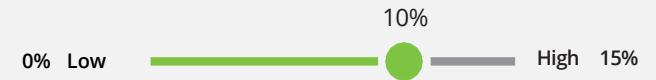
Key market stats



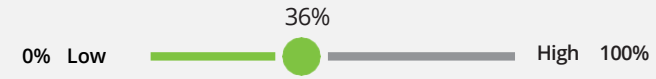
Internet Penetration¹



2021-2026 Digital Ad market CAGR²



Digital share of total Ad spend³



Privacy state of play

Privacy yet to become a leading focus due in part to limited impact of recent platform changes and low digital ad market penetration and sophistication.



Ecosystem response

Very limited sell-side response, beyond nascent foundation-building.

Focus slowly increasing as broader platform changes approach.

1. Source: World Bank (2020 internet penetration rate).
2. Source: Statista.

3. Source: eMarketer (2021 digital share).



Latest developments

The personal data protection commissioner issued a public consultation paper in Feb 2020, identifying gaps within Malaysia's Personal Data Protection Act as compared to equivalent laws in other jurisdictions (including the EU's GDPR).

Proposals in the paper include mandating the appointment of a data protection officer and the reporting of data breaches.

Key processing obligations



- Data transfer restrictions
- Data protection officer requirement ^(b)
- Data breach notification ^(b)
- Data retention limitation



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Definition of Personal Info

Personal information refers to information about an identifiable individual, and includes information relating to a death.

Key user rights



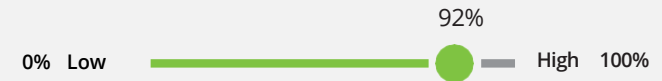
- Right to be informed
- Right to access
- Right of rectification
- Right to erasure
- Right to object / opt out / restrict processing
- Right to data portability
- Right to object to automated decision making



Key market stats



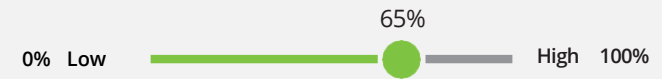
Internet Penetration¹



2021-2026 Digital Ad market CAGR²



Digital share of total Ad spend³



Privacy state of play

The regulation is yet to specify how it will impact digital marketing and establish a framework to give users a way to opt in or oppose in the tracking of their data.

Hence, conversations across the ad sales ecosystem focus primarily on how to respond to platform changes.



Ecosystem response

Despite abandoning KPEX, a premium sell-side advertising and data alliance, the ecosystem is working collaboratively to define its privacy response.

No clear path or preferred technology has yet arisen, leaving players to focus on building first-party foundations and experimentation with new technologies.

1. Source: World Bank (2020 internet penetration rate).

2. Source: Statista.

3. Source: eMarketer (2021 digital share).



Latest developments

The provisions of the Privacy Act 2020 came into force in Dec 2020, building upon the previous Privacy Act 1993.

The 2020 Act was the result of extensive discussions on the reform of privacy laws by the New Zealand Law Commission and the Office of the Privacy Commissioner. These amendments serve to:

1. Strengthen privacy protections
2. Promote early intervention and risk management
3. Enhance the role of the Privacy Commissioner

Key processing obligations



- Data transfer restrictions
- Data protection officer requirement
- Data breach notification
- Data retention limitation



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1 Limited privacy impact

Privacy slowly making its way onto the radar

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 Definition of Personal Info

Identity information refers to information which may authenticate or identify an individual or an information system and enable access to any data or information system. ^(a)

Key user rights 

- Right to be informed #
- Right to access #
- Right of rectification #
- Right to erasure #
- Right to object / opt-out / restrict processing #
- Right to data portability #
- Right to object to automated decision making #

#: To be included under draft privacy legislation.

 Latest developments


Pakistan is in the process of formulating a dedicated law on privacy, with the draft Personal Data Protection Bill currently being considered by the government.

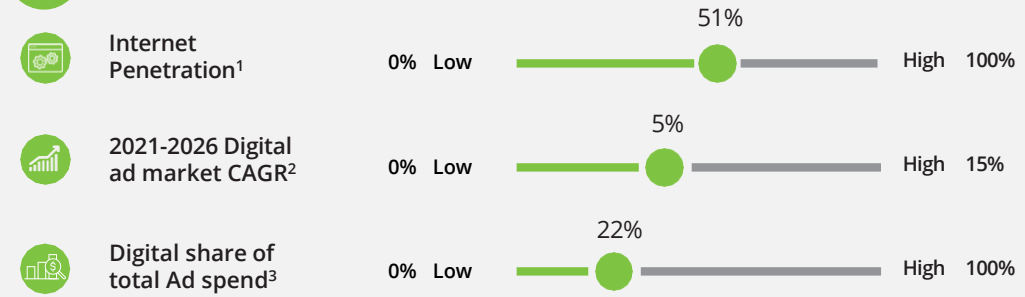
Once enacted, this will be the main piece of legislation covering privacy in Pakistan (which is currently dealt with in other laws, such as the Prevention of Electronic Crimes Act).


Key processing obligations 

- Data transfer restrictions
- Data protection officer requirement #
- Data breach notification #
- Data retention limitation #


#: To be included under draft privacy legislation.

 Key market stats



 Privacy state of play

Lowest privacy focus across all the markets we surveyed due to low consumer concern, lack of legislation, platform mix and low digital share of ad sales.

 Ecosystem response

Very limited sell-side response, beyond nascent foundation-building.

Focus slowly increasing as broader platform changes approach.

1. Source: Pakistan Telecommunications Authority, June 2022 2. Source: Statista. 3. Source: eMarketer (2021 digital share).



Definition of Personal Info

Personal data refers to all data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which the organization has or is likely to access. ^(a)

Key user rights



- Right to be informed
- Right to access
- Right of rectification
- Right to erasure ^(b)
- Right to object / opt out / restrict processing
- Right to data portability[#]
- Right to object to automated decision making

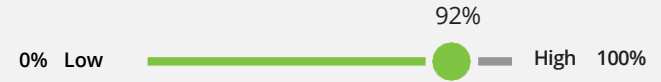
[#]: Provision not effective yet.



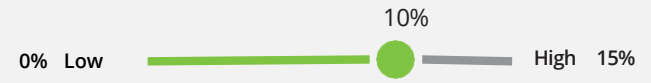
Key market stats



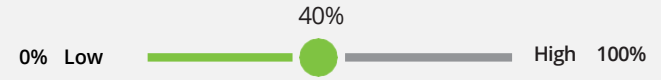
Internet Penetration¹



2021-2026 Digital Ad market CAGR²



Digital share of total Ad spend³



Privacy state of play

Strictly enforced privacy legislation, some buy-side willingness to pay for audience data-based ads and impact of recent platform changes all driving some level of, primarily compliance-focused, privacy response.



Ecosystem response

Top 2 publishers have invested in first-party data-based infrastructure and established an alliance focused on advertising sales and data.

Meanwhile, the bulk of the ecosystem appears mostly focused on regulatory compliance.

1. Source: World Bank (2020 internet penetration rate).

2. Source: Statista.

3. Source: eMarketer (2021 digital share).



Latest developments

The Personal Data Protection (Amendment) Act 2020 took effect in Feb 2021, implementing significant changes to Singapore’s Personal Data Protection Act. Key highlights include:

1. Strengthening enforcement powers for the regulator
2. Creating new criminal offences for egregious mishandling of personal data
3. Mandatory data breach notification requirements

Key processing obligations



- Data transfer restrictions
- Data protection officer requirement
- Data breach notification
- Data retention limitation



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Definition of Personal Info

Personal data refers to any data relating to a living person that identifies a particular individual. This extends to: (i) information that, when easily combined with other information, can identify the individual, as well as (ii) pseudonymized information.



Latest developments

Major amendments to South Korea's privacy laws were passed by the National Assembly back in 2020.

A key change involved the distinguishing of "personal data", "pseudonymized data" and "anonymized data", with *anonymized data* being excluded from the scope of *personal data*. This was done with a view to balance privacy concerns and a desire to develop a domestic data economy.

Key user rights



- Right to be informed
- Right to access
- Right of rectification
- Right to erasure
- Right to object / opt-out / restrict processing
- Right to data portability#
- Right to object to automated decision making#

#: To be included under draft privacy legislation.

Key processing obligations



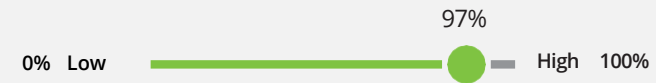
- Data transfer restrictions
- Data protection officer requirement
- Data breach notification
- Data retention limitation



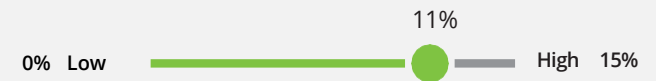
Key market stats



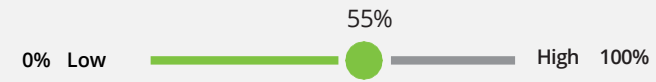
Internet Penetration¹



2021-2026 Digital Ad market CAGR²



Digital share of total Ad spend³



Privacy state of play

Rising consumer concern, privacy regulation and global platform changes driving an increased focus on privacy.

At the same time, platform mix and market growth have dampened the impact of recent platform changes.



Ecosystem response

Most players focusing on building first-party data foundations and on experimenting with new forms of revenue, e.g. rewarded ads.

Focus slowly increasing as broader platform changes approach, especially around the use of first-party data in acquiring users and developing product.

1. Source: World Bank (2020 internet penetration rate).

2. Source: Statista.

3. Source: eMarketer (2021 digital share).



Definition of Personal Info

Personal data as defined under the Personal Data Protection Act 2015, refers to, *inter alia*, a natural person's name, date of birth, passport number, medical records, data concerning a person's social activities and any other information that may be used to identify a natural person.



Latest developments

The National Development Council ("NDC") sought public feedback on amendments to privacy laws in 2019, with a view to adopting additional restrictions and obligations similar to GDPR, along with the establishment of an independent data regulator.

Subsequently, in May 2021, a public statement from the NDC suggests that plans to revise the laws are still in place, and it remains to be seen how these developments will translate into law.

Key user rights



- Right to be informed
- Right to access ^(a)
- Right of rectification
- Right to erasure
- Right to object / opt-out ^(b) / restrict processing
- Right to data portability
- Right to object to automated decision making

Key processing obligations



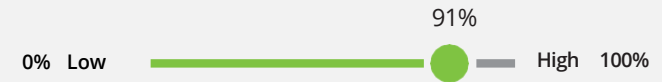
- Data transfer restrictions
- Data protection officer requirement ^(c)
- Data breach notification
- Data retention limitation



Key market stats



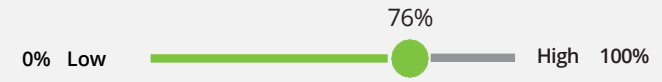
Internet Penetration¹



2021-2026 Digital Ad market CAGR²



Digital share of total Ad spend³



Privacy state of play

Privacy regulation in place, currently being upgraded to match GDPR.

Strong consumer concerns around privacy, dominance of digital advertising, privacy legislation and strong impact of recent platform changes all driving a very strong focus on privacy.



Ecosystem response

Strong ecosystem-wide response focusing on building first-party data infrastructure and retaining control of first-party data at every step of the ad sales activity chain.

Collaboration between leading publishers is also being considered.

1. Source: World Bank (2020 internet penetration rate).

2. Source: Statista.

3. Source: Dentsu (2021 digital share).



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Definition of Personal Info

Personal data refers to any information relating to a natural person, which enables the identification of such person, whether directly or indirectly, but not including information of deceased persons.



Latest developments

The Personal Data Protection Act was published in May 2019 in the Royal Gazette, and is the first consolidated privacy law in Thailand, setting out user rights and processing obligations comparable to that of GDPR.

The full enforcement of the Act was postponed twice since it was first published, and it has since taken effect from 1 June 2022.

Key user rights



- Right to be informed
- Right to access
- Right of rectification
- Right to erasure
- Right to object / opt out / restrict processing
- Right to data portability
- Right to object to automated decision making

Key processing obligations



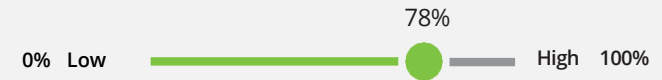
- Data transfer restrictions
- Data protection officer requirement
- Data breach notification
- Data retention limitation



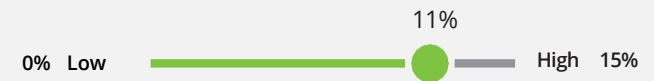
Key market stats



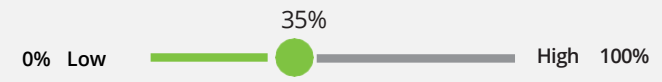
Internet Penetration¹



2021-2026 Digital Ad market CAGR²



Digital share of total Ad spend³



Privacy state of play

Draft privacy bill, with ambition to match GDPR and tabled three years ago, recently came into force in June 2022.

Low maturity of the digital advertising ecosystem and limited impact from recent platform changes hindering ecosystem focus on privacy.



Ecosystem response

Most players focusing on building first-party data foundations.

Focus slowly increasing as broader platform changes approach.

1. Source: World Bank (2020 internet penetration rate).
2. Source: Statista.

3. Source: eMarketer (2021 digital share).



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1 Limited privacy impact

Ad market demand dynamics hindering focus on privacy ahead of regulation

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Definition of Personal Info

Personal information is broadly defined in the Law on Cyber Information Security as information associated with the identity of a specific person.

Key user rights



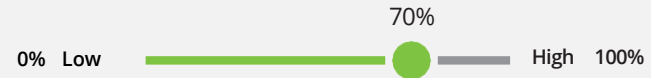
- Right to be informed
- Right to access
- Right of rectification
- Right to erasure
- Right to object / opt out / restrict processing
- Right to data portability
- Right to object to automated decision making



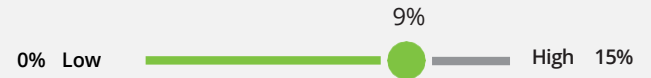
Key market stats



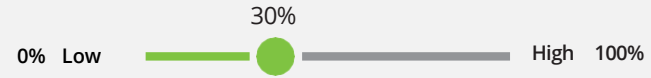
Internet Penetration¹



2021-2026 Digital Ad market CAGR²



Digital share of total Ad spend³



Privacy state of play

Privacy yet to become a leading focus due in part to low regulatory intervention, limited impact of recent platform changes and low digital ad market penetration and sophistication.



Ecosystem response

Most players focusing on building first-party data foundations.

Focus slowly increasing as broader platform changes approach.



Latest developments

As Vietnam's privacy laws are currently found across different sources (ranging from criminal, to IT and cybersecurity laws), the Ministry of Public Security released the draft Decree on Personal Data Protection in Feb 2021, aiming to consolidate the relevant laws into one comprehensive law, and to improve upon the existing regulations.

Originally scheduled to take effect in Dec 2021, the draft decree is still being revised at present.

Key processing obligations



- Data transfer restrictions
- Data protection officer requirement
- Data breach notification ^(a)
- Data retention limitation ^(b)

1. Source: World Bank (2020 internet penetration rate).
2. Source: Statista.

3. Source: eMarketer (2021 digital share).

Footnotes

Australia

- (a) No specific right to erasure, but obligations are imposed on entities to delete or de-identify personal information once it has been used for the notified purpose(s) of collection.
- (b) No holistic right to object, but requirement to allow individuals to cease processing their personal information for direct marketing.
- (c) No specific requirement for a Data Protection Officer. However, Australian Privacy Principle 1 under the Privacy Act 1988 (Cth) provides that entities must ensure that they manage personal information in an open and transparent way. A component can be appointing a DPO to oversee privacy.

Hong Kong

- (a) No specific right to erasure, but personal data must not be kept longer than is necessary to fulfil the purpose for which it is used.
- (b) Section 33 of the Personal Data Privacy Ordinance which prohibits the transfer of personal data outside HK is not yet in force, but a guidance note has been issued by the Privacy Commissioner for Personal Data on best practices in making such data transfers.
- (c) Not a strict requirement to appoint a data protection officer, but recommended under the best practice guide issued by the Privacy Commissioner for Personal Data.

Indonesia

- (a) A newer definition of “personal data” in line with other jurisdictions has been proposed under the draft privacy legislation.

Japan

- (a) For clarity, do note that the right to “opt-out” here only refers to the right of data subjects requesting to cease transferring their data to a third party that is allowed by registration at the authority.

Malaysia

- (a) The definition also includes conditions relating to the data being used in respect of commercial transactions, and the manner of processing such data.
- (b) No such overarching obligations at present (may be required in certain circumstances), but requirement has been proposed in a public consultation paper.

Pakistan

- (a) A newer definition of “personal data” in line with other jurisdictions has been proposed under the draft privacy legislation.

Singapore

- (a) “Business contact information” does not fall within the scope of the Personal Data Protection Act.
- (b) No specific right, but organizations are required to cease to retain personal data if such retention is no longer necessary for legal or business purposes.

Taiwan

- (a) Right to access only extends to a data subject being given the right to request a copy of one's personal data, as per Article 3(2) of the Personal Data Protection Act.
- (b) There is no express stipulation relating to a data subject's “right to opt-out”, but Article 3(4) of the Personal Data Protection Act sets out that data subjects have the right to demand the cessation of the collection, processing or use of his/her personal data.
- (c) No mandatory requirement to appoint a data protection officer, but sufficient manpower should be allocated to handle the relevant data protection matters in the company.

Vietnam

- (a) No strict timeframe specified for such notifications.
- (b) No overarching data retention obligation, but data retention obligations may be found in industry-specific laws and regulations that apply to the organisation.



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