

# DEFINING BRAND SAFETY: THE YEAR OF THE CONSUMER

A report commissioned by the Brand Safety Institute





### **Brand Safety defined:**

**Brand Safety defined: The term “Brand Safety” describes the controls that companies in the digital advertising supply chain employ to protect brands against negative impacts to the brand’s consumer reputation associated with specific types of content, criminal activity, and/or related loss of return on investment. - [Defining Brand Safety 2018](#)**

In our continued effort to keep Brand Safety Officers and other interested parties in the digital advertising supply chain informed on the evolution of the practice of Brand Safety, we reached out to members of the [Brand Safety Institute Advisory Board](#) as well as other executive practitioners across the digital advertising supply chain. The focus of our interviews with these professionals was to better understand how their approach to Brand Safety has changed in 2019 including three topics - Advertising Fraud, Adjacency, and Privacy - that were particularly prevalent in the industry over the course of the year.

Ad Fraud remains a critical part of the Brand Safety team in 2019, so much so that internal analysts within some organizations are finding fraud that their verification technology is not. This points to a continued need for education and best practice sharing within the industry.

In addition to Ad Fraud, Ad Adjacency in the form of video or display took significant steps

in 2019. Buyers indicated that they put an inordinate percentage of their resources in 2019 to addressing ad adjacency issues because of the continued growth in negative consumer and media backlash targeted at brands whose ads show up in undesirable places. However, when it comes to campaign performance, fraud is a much bigger issue because “bots don’t buy pizza”.

Joining fraud and adjacency as top of mind issues, consumer privacy and controls took off in 2019 as organizations scrambled to understand and plan for pending regulations. The biggest barrier to move intensive action on this front was uncertainty. With the California Consumer Privacy Act (CCPA) going into effect in 2020, and the continued lobbying in 2019 for possible pivots to the legislation, organizations adopted a wait-and-see approach to consumer privacy. Once the final i’s are dotted and t’s crossed on the California legislations it will certainly set off a mad scramble to achieve compliance and establish consumer trust.

# Advertising Fraud

## Takeaways

1. Fraud is still rampant in non-opaque channels such as OTT, SSAI, and social platforms.
2. Pre-bid blocking from verification vendors is critical to not just fraud, but overall IVT blocking and that frees up buyer and Brand resources for further analysis.
3. Skill and educated labor always keeps the safety guards up 24/7 as technology is not 100 percent full proof.

Ad Fraud and association with criminal activity is still in the top tier of concerns within Brand Safety circles. Buyers, however, believe the control processes protecting them and their campaigns from fraud are much stronger in 2019. They also cite a deeper bench of educated personnel in addition to stronger tools as the basis for their increased confidence. The heightened scrutiny over the past couple of years has led to measurable reductions in ad fraud from industry verification vendors as well as the [Annual Fraud Report from the Trustworthy Accountability Group \(TAG\)](#).

Despite improved controls, areas of concern over vulnerability to fraud still remain. The most notable of these surround Server Side Ad Insertion (SSAI), Over The Top (OTT), influencer marketing, search, social platforms or anywhere measurement and transparency issue persist.

Buyers of digital advertising are finding Ad Fraud emerging in areas where there is less transparency. In these instances, they are typically only catching these forms of fraud in the “rearview mirror” of post-campaign analysis conducted by internal teams. Of those interviewed, companies with dedicated Brand Safety teams applying those resources to combing through campaign reports looking for anomalies and finding areas that the verification vendors are not identifying.

These gaps are not characterized as a reflection of the quality of accredited verification vendors.

Rather, those interviewed stated that the push for pre-bid blocking in programmatic, especially when it comes to General Invalid Traffic (GIVT), has been very helpful in eliminating waste and IVT coming from lists of data centers supplied by verification vendors and other sophisticated techniques those vendors employ. They are also finding bot fraud numbers are going down based on their own analysis of data across multiple certified companies and accredited vendors.

These strengths of verification vendor performance have allowed internal Brand Safety resources within buyer organizations to redeploy resources that had been engaged in these pursuits manually. Notably, prebid programmatic blocking has allowed for a redirection of buyers personnel labor to analyze other data points versus the time constraints of post bid analysis and impression make good discussions. This labor availability from automation such as pre-bid filters has allowed educated Brand Safety teams time to dig deeper into a broader array of sources of Ad Fraud.



\* **Prebid blocking** is the action taken to block programmatic bidding using a technology layer and other business rules applied at auction.

## Previewing the Year of the Consumer in Brand Safety

Whereas Ad Fraud is predominantly a business-to-business issue within Brand Safety, the other two issues that are increasingly top of mind for the Brand Safety executives we spoke to are much more focused on how consumers perceive digital advertising and how it impacts their perception of the brands doing that advertising. Consumers are increasingly noticing Ad Adjacency, the set of issues that may arise when a brand's ads are shown next to objectionable or controversial content, and causing Brand Safety officers to react rather than risk outcomes like protests or boycotts.

Likewise, Privacy and consumer consent to the use of data in digital advertising has risen to the fore as a significant issue. Consumers, through lawmakers in the US and Europe, are increasingly exerting their influence on how and when data about their digital lives can be used by brands, publishers, and their partners in the course of targeting digital ads. Brand Safety Officers will have to stay on top of the legislative environment and what consumers project about what constitutes digital trust or they will risk their brands being undermined by the very advertising meant to promote it.

## Content Avoidance/Ad Adjacency

### Takeaways

1. Social platform transparency issues and lack of third party measurement among greatest concern tackling ad adjacency issues.
2. Skilled practitioners are essential in using the tools which are ok, but a blunt instrument.
3. Publishers need to make sure content is just as targetable in direct buys as it is programmatic making sure the variables for content tagging are exposed to programmatic channels.

Ad adjacency scanning accelerated this year as buyers struggled with how their ads were placed within social platforms and news articles. The biggest areas of risk in 2019, according to buyers, remain the social platforms. This risk stems from limitations on third party measurement that contribute to the opaqueness of the "walled gardens" of platforms like YouTube, Facebook, and Twitter. Respondents indicated that they expected these risks to persist until buying from these sources shows some downward trend in turn eroding the leverage of the largest platforms. Our respondents were far more critical of the opacity of the social platforms during these interviews than in previous ones.

Moving beyond adjacency risks on the largest social platforms, tools available to prevent unwanted placements on buys from traditional publishers on the open web continue to improve but were still only given a grade of B-/C+ by our respondents. One of the challenges buyers articulated with contextual analysis tools is that while the matching of a textual article and keywords is better, it remains much more of an art than a science. Knowing what keyword combinations to plug into the system for content avoidance is best leveraged through skilled practitioners. While the technology continues to improve as a result of building in guidance from the MRC, 4A's and IAB, the tools are still only as good as the experience, knowledge, and smarts of the operator.

Common examples cited by more than one buyer included political news information as well as stories of the murder of Washington Post journalist Jamal Khashoggi. These examples were characterized by keywords that hadn't necessarily presented themselves as objectionable in the past and therefore weren't tagged by the existing keyword lists. Despite the negativity associated with those stories, even brands with conservative keyword restrictions found their ads placed adjacent to these stories.

The reactions to these mishaps caused many buyers to swiftly remove and rethink their avoidance criteria. This rethink proved to be challenging for two reasons. One, Brand Safety in the area of Ad Adjacency is subjective and therefore additionally classified as a Brand Suitability approach making the onboarding of the client and campaign more time intensive. Some Brands find that they do not have avoidance issue with these topics while others only discover their avoidance desires mid flight causing more labor resources to be diverted to remediate a campaign mid flight.

The other challenge in buying on the open web is that while publishers will sell Brand Safety measures in direct I/O's (i.e., tools and content tagging to help align business rules of avoidance), programmatic buys come with fewer such options presenting a bigger adjacency challenge in those situations. Buyers are increasingly stating that even though there are intermediaries in programmatic and the CPM is less, Publishers still need to do a good job tagging content, providing keywords, and supplying that data upstream for targeting as the semantic tools used in programmatic channels sometimes are limited to the obfuscation of hops. Publishers argue this is a benefit of working directly with them of course to ensure transparency.

While buyers and Brands stated the vendors and publishers operating on the open web need to be better, the lack of insights into social platforms is the number one ad adjacency concern for 2020.

## Consumer Privacy and Data Governance

### Takeaways

1. 2019 European regulator activity playing a part in U.S. preparedness for CCPA.
2. Large B2C Brands and Publishers with compliance operations having easier time implementing compliance across organization including marketing departments. Small Brands and business having more difficult time with compliance and are asking for help.
3. Consumer experience is the cornerstone of consumer trust and we're just beginning to think about consent. With GDPR in full steam and CCPA taking effect, 2020 will be the year of the consumer.

Privacy certainly made a lot of headlines 2019 and some of it was based on action but, more than anything, this has been a year of wait-and-see on the privacy front.

Publishers doing business in Europe were forced into action in 2019 due to regulatory activity. These companies focused their action in 2019 on two emerging realities of the General Data Protection Regulation (GDPR). The Information Commissioner's Offices (ICO's) in Europe were slowly starting to turn the regulatory wheel in the direction of the digital advertising supply chain.

At the same time, on the other side of the Atlantic Ocean, the California Consumer Privacy Act (CCPA) was being hotly contested. Industry lobbying, as well as the deadline for the law to take effect on January 1, 2020, were causes for publishers to re-evaluate their GDPR response.

Among respondents interviewed, many stated that their consumer opt-in consent development and other data security actions closely followed:

1. developments with the small but noticeable regulator actions against companies,
2. the ICO's inquiry of advertising practices, and
3. the standards development by IAB Europe and the IAB Tech Lab known as the Transparency and Consent Framework version 2.0

Agency buyers and intermediaries indicated that the companies they worked with, brand clients and publishers who own consumer relationships, were behind in their implementation activities due to the uncertainty still remaining.

Among the marketers and publishers responding to our interview requests, many indicated that privacy compliance is a heavy lift that will require coordination across many departments as well as some partners. With CCPA looming at the start of 2020, these respondents indicated that the third quarter of 2019 saw an uptick in activity to ensure readiness for whatever the final requirements of the California law end up being.



While the obligation of publishers related to GDPR and CCPA are relatively clear given their direct relationship, agency buyers began noticing more Brands reaching out for guidance around CCPA compliance issues in recent months. This was especially true of those brands not operating in Europe or targeting European consumers through their advertising. Agencies reported that Brands have been requesting consultation around tagging of their sites, products, and compliance around consent. Most agencies spoken to did not feel comfortable providing counsel for this type of inquiry but have put forth efforts to help their Brand clients understand the data uses inherent in digital advertising and what type of consent is needed to utilize different types of data for advertising purposes on behalf of those brands.

The Brands interviewed directly were more confident that their internal practices across departments were well-organized but there was a clear correlation between the size of the organization when it comes to their confidence in their approach to addressing the pending CCPA regulation. Because CCPA and GDPR carry consequences for lack of consumer consent across product use cases, not just inclusive of advertising, companies with larger compliance operations have been spearheading the consumer consent and data use restrictions, education and development. The marketing departments in the larger Brand organizations have been able to follow suit.

Smaller Brands have had a more difficult time understanding the compliance ramifications of CCPA and their marketing departments have outwardly requested aid from agency partners.

The agencies we spoke to indicated that while they are providing what advice they can, they clearly do not want to cross the line into offering legal advice to their Brand clients. They will, however, advise on the uses of data for advertising targeting and retargeting purposes based on consent as they are liable for that processing.

While regulatory compliance is driving these conversations, it is consumer consent that is at the heart of the issues. Some advertising supply chain companies have modeled opt out and opt in financial models. They believe if they execute the consumer experience appropriately by offering up opt in consent under GDPR and opt out consent in CCPA with good user experience in a privacy friendly way, that the relative financial impact to their organization will be minimal. However, they acknowledge we are just reaching “base camp” on the consumer trust and privacy front. All interviewed believe that the challenge to restore trust is going to be a long road making next year, 2020, the Year of the Consumer.



## About The Author

Scott Cunningham, is owner of Cunningham.Tech Consulting and is Founder of the IAB Tech Lab. He has worked with TAG since its inception in 2014 and was author if the IAB’s LEAN principles around User Experience in digital advertising and publishing. His publishing and technology experience expands over 20 years prior to his industry work. He can be reached at [scott@cunningham.tech](mailto:scott@cunningham.tech). [www.cunningham.tech](http://www.cunningham.tech)

Special recognition goes to Neal Thurman, Co-Founder, BSI, who contributed to the paper. Mr. Thurman brings significant experience in the digital advertising supply chain from leadership roles working with the McGraw-Hill Companies, Vox Media, and NBC Sports Digital as well as having served as the Managing Director of the digital agency MediaSphere.

## About the Brand Safety Institute

[The Brand Safety Institute](#) was founded to support education on and the practice of Brand Safety in the Digital Advertising Supply Chain. Through a program of research, education, and certification BSI offers knowledge, tools, best practices, and a community of peers to the individuals charged with championing the cause of Brand Safety.

