

## Questionnaire for Partner Compliance under GDPR-K - Publishers

*These are the questions you should be asking all of your technology partners, eg any party that plugs into your site or app, or whose code you have included in your digital property. This includes ad networks, analytics, social media plug-ins, tag managers, etc.*

*Remember - under GDPR (and COPPA) you are legally liable for any data collection that happens on your site, even if by a third party.*

*Feel free to use the questions below in order to understand what your partners are collecting and how they are using it. Your legal advisers will need this information in order to help you prepare for GDPR and GDPR-K.*

#	Question	Response
0	Please describe the purpose of your service in a few sentences:	
1	Please provide a link to your current <b>Privacy Policy</b> :	
2	Has this policy been updated for compliance with GDPR?	
3	If no, please provide an estimated date for when your GDPR-ready Privacy Policy will be available:	
4	Do you collect any personal data, including persistent identifiers such as IP addresses, device IDs, UDID, AdID, user agent, geolocation, or similar from EU visitors to our site/app?  If <b>Yes</b> , please list all types of data collected in <a href="#">Schedule 1</a>	
5	If it is stored, where is the data you collect from our site/app stored?	
6	Does your service engage in—or enable any other party to engage in—user profiling, behavioural targeting, retargeting or similar tracking of users across domains?	
7	Do you create or use unique identifiers for the any of the following purposes: frequency capping, impression or	

	<p>conversion counting, measuring viewability, or matching users across devices - whether from user in the US or the EU?</p> <p>If <b>Yes</b>, please explain how you do each activity and name any third parties with whom you share such identifiers:</p>	
8	<p>What is the <u>primary</u> legal basis on which you are collecting personal data (including technical identifiers) from EU visitors to our site/app (tick the one that applies):</p> <p>Consent <input type="checkbox"/></p> <p>Legitimate Interest <input type="checkbox"/></p> <p>Contractual Necessity <input type="checkbox"/></p> <p>Vital Interest <input type="checkbox"/></p> <p>Public Interest <input type="checkbox"/></p> <p>Compliance with Legal Obligation <input type="checkbox"/></p>	
9	<p>If you selected <b>Legitimate Interest</b>, please describe the balancing test you conducted to (a) determine that the data collection is necessary, (b) weigh your legitimate interests against the impact on, and the basic rights of, our users, bearing in mind that they may be children:</p>	
10	<p>If you selected <b>Consent</b>, please explain how you obtain consent from our users:</p>	
11	<p>Please explain how you assess whether a Consent is existing or valid when you are collecting personal data from our users:</p>	
12	<p>Please explain how you provide our EU users with access to the personal data you have collected from them and how they can request deletion of their data:</p>	
13	<p>If you selected any other legal basis for collecting data from EU visitors to our site/app, please explain your rationale:</p>	

