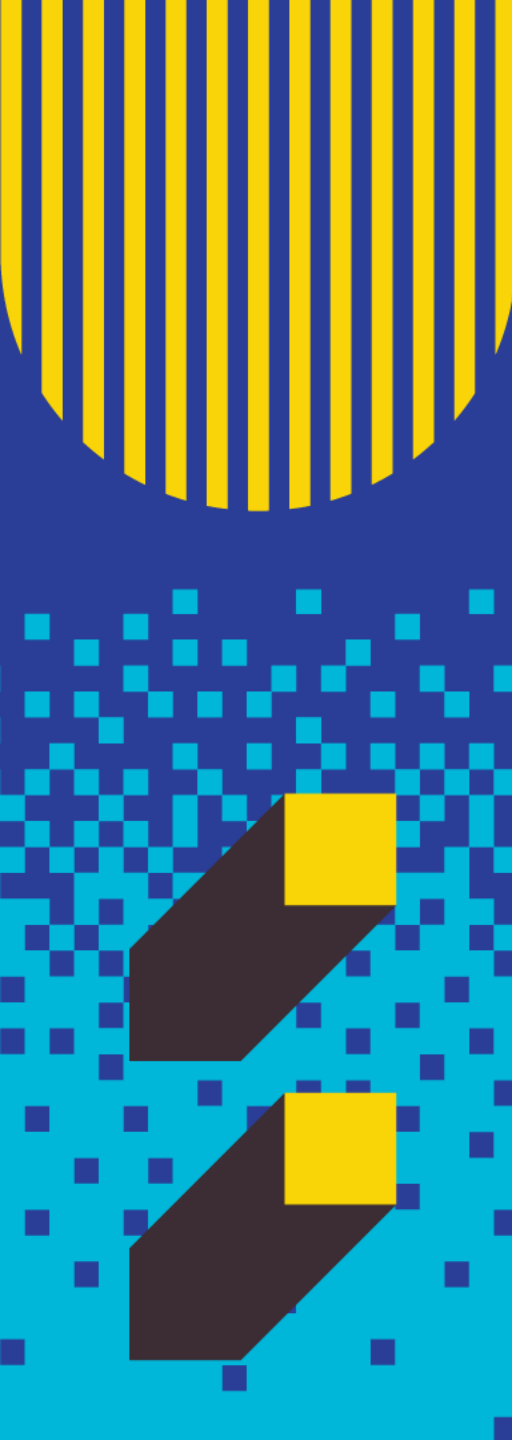




IAPP PRIVACY. SECURITY. RISK. + AI GOVERNANCE GLOBAL 2026

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RETAIL MEDIA NETWORKS

Unique Privacy and Advertising Considerations



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WELCOME AND INTRODUCTIONS



Mark Francis

Partner – Data Strategy,
Security & Privacy

Holland & Knight LLP



Andrew Belsick

Director – Data
Privacy/Protection

BDO USA



Cori Palmer

Assistant General Counsel

Lovesac



Michael Dolan

Vice President, Chief Privacy
Officer

Best Buy



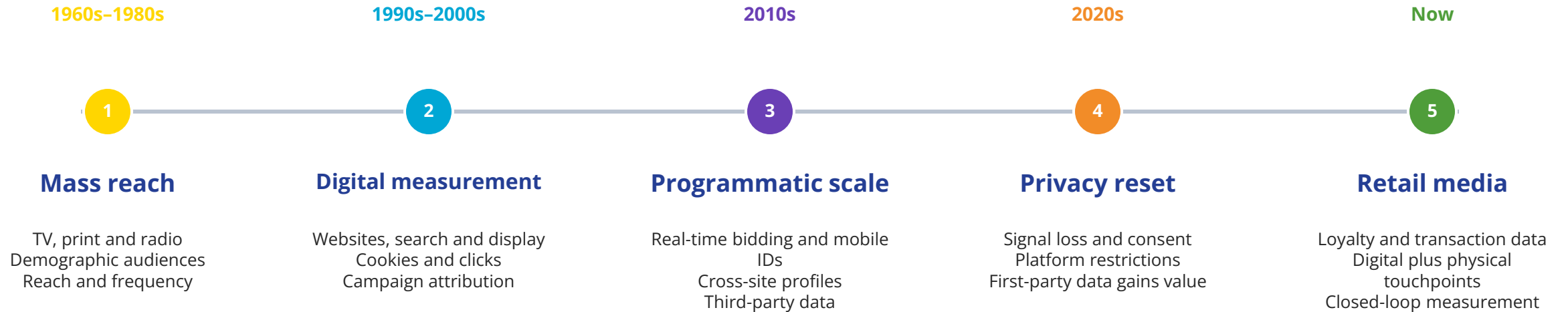
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AGENDA

- I. Digital Marketing Journey
- II. Traditional targeted advertising v. retail media networks
- III. Data sharing challenges
- IV. Different retail media network models
- V. Implementation, privacy and legal considerations
- VI. Privacy & Digital Marketing Partnership
- VII. Closing remarks / questions and answers

The evolution of digital marketing

How did marketing move from a 30-second spot to an audience built from real purchase behavior?



The center of gravity moved closer to the transaction. Retailers now combine media reach with customer identity, purchase signals, and measurement.

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“Traditional” Targeted Advertising

1. Your Data

You own valuable customer data.



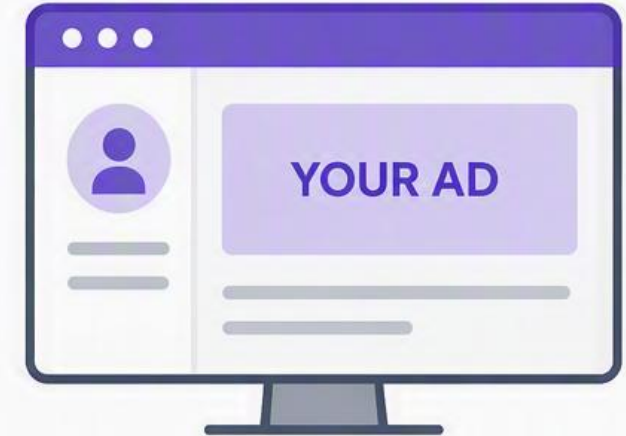
2. You Bring It

You upload / share your customer data with advertising platforms.



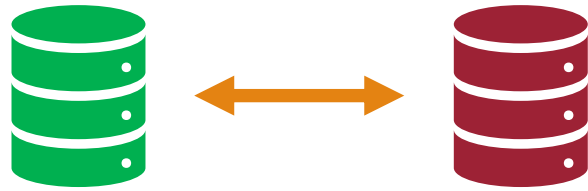
3. They Target & Deliver

Platforms use your data to target audiences and deliver your ads.



Data sharing challenges – the new reality

Historic data transfers



Deal Issues

- Ownership/licensing rights
- Confidentiality

Current data transfers



Deal Issues

- Ownership/licensing rights
- Confidentiality
- Privacy law compliance, e.g.:
 - Who is a controller or processor?
 - Access, deletion and opt-out rights?
 - Is data subject consent needed?
 - Who is liable for privacy violations?

Aligning on data sharing challenges

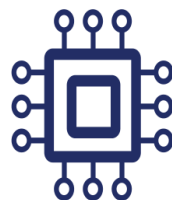
Business Considerations

- What are the key business objectives and what data do you *really* need to achieve them?
- What data is each party willing to share, and under what terms?
- What are the fees and expenses?



Technical Considerations

- What infrastructure (tech stack) will be used?
- Who is responsible for the infrastructure?
- What governance is in place (security, access controls)?



Legal Considerations

- What is the contractual framework?
- How will data sharing activities comply with the patchwork of evolving privacy laws?
- Who is responsible for privacy compliance and risk?



Retail Media Networks

1. Your Customer Data

You own valuable customer data.



2. You Bring Advertisers to Your Data

Advertisers connect to your retail media network.

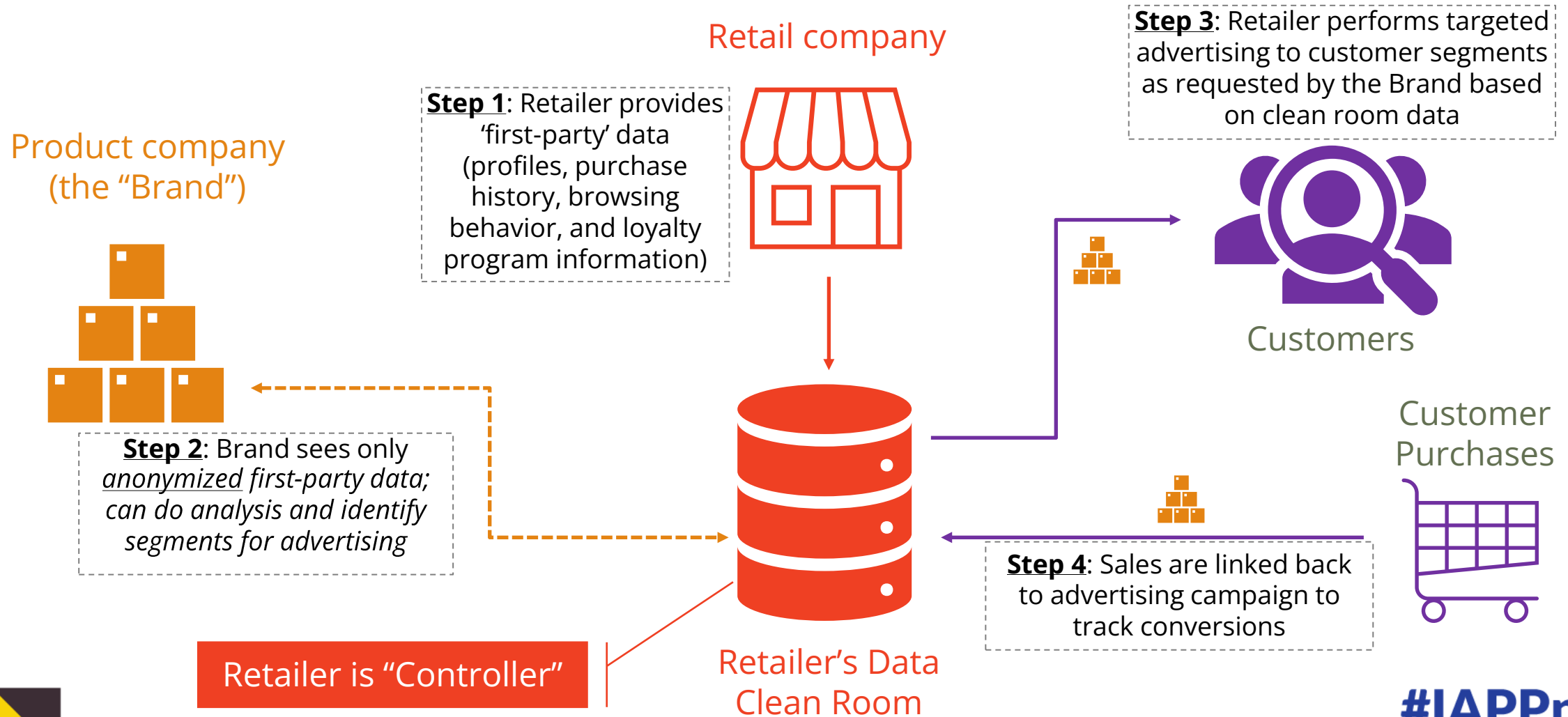


3. They Advertise to Your Customers

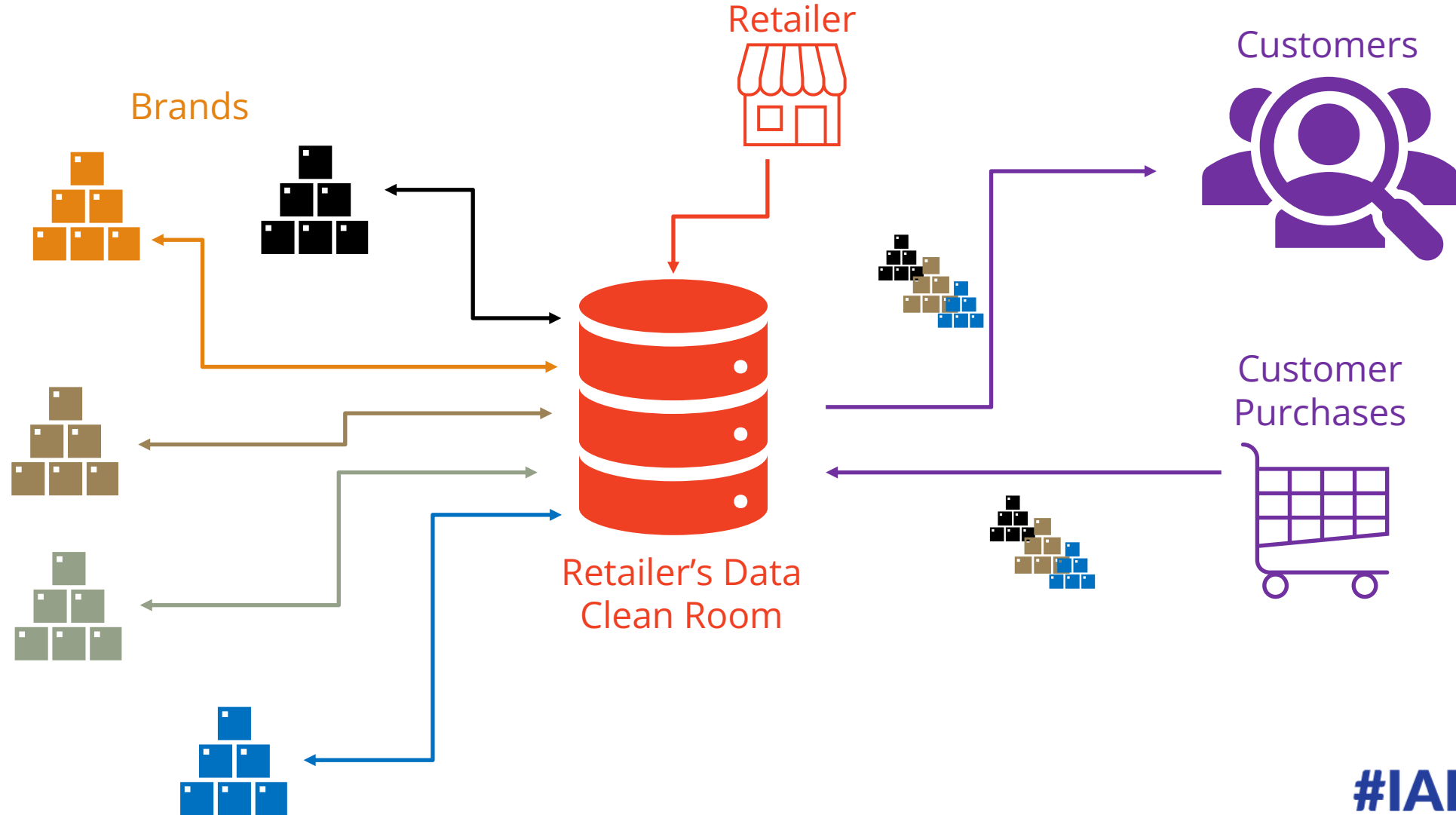
Advertisers run targeted ads across your channels.



Retail Media Networks (One Controller)

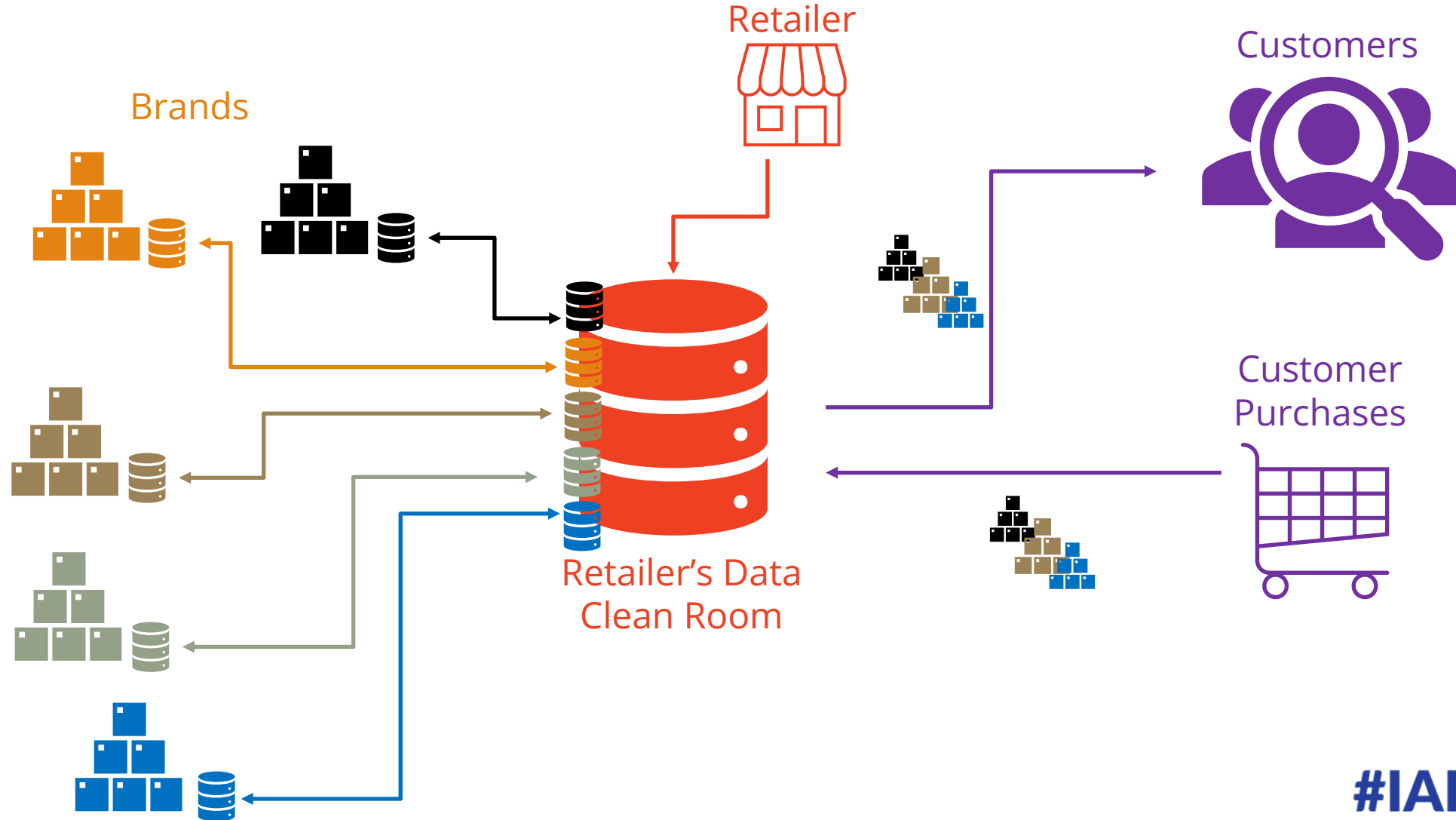


Retail Media Networks (One Controller)



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Retail Media Networks (C2C Model)



Implementation Considerations

Data considerations:

- Volume of customers (CRM size)
- Customer data available for effective targeting (e.g., profile, browsing and transaction history)
- Active customer engagement (e.g., website visits, in-person interactions)

Targeting options (displays, promotions):

- Retailer website/app
- Retailer marketing emails/texts
- Retailer social media advertising
- Brick-and-Mortar displays and promotions

Security considerations:

- Strict clean room governance
- Access controls (who can see what)
- Data export restrictions
- Maintain data silos/segregation despite comingling for analysis and visualization



Privacy/Legal Considerations

Privacy – legal compliance:

- Additional customer notice and/or consent?
- Address *data minimization* requirements under privacy laws
- Processing access/deletion requests
- Processing opt-outs
 - PI “selling” or “sharing”
 - Cross-site targeted advertising
 - Data combinations

Privacy – contract provisions:

- *Identifiable* v. *pseudonymized* v. *anonymous* data
- Use of “sensitive” personal information
- DPA needed?
 - Who is a controller/processor?
- Restrictions on data contributions, use, exports
- Enforcing privacy rights compliance (access, deletion, opt-outs)
- Confidentiality, liability, indemnity, IP rights...
- Tracking conversions



What about extreme data minimization?

States' common theme today (FTC Act too):

Limit collection, use, and retention of personal information to what is reasonably necessary to fulfill purposes disclosed to consumer.

Advocates' proposal:

Limit collection, use, and retention of personal information to what is necessary to provide a consumer a requested product or service.

- What about political campaigns and their targeted advertising?
- Commercial speech is protected too.

Modeling Different Retail Media Networks

Basic RMN (No Brand Data)	Limited Brand Data (No Brand PI)	PI Data Matching ("Joint" Controllers)	Independent Owners (Controller-to-Controller)
RMN customer data (no visible PI)	RMN customer data (no visible PI) + Brand de-identified data	RMN customer data + Brand customer data (data matching)	RMN and Brand exchange customer data
Brand does not share any data with RMN Brand can access deidentified customer data in RMN clean room, targeting based on attributes (e.g., age range, purchase history, region) Brand receives aggregate reporting back	Brand imports de-identified data into RMN clean room Enhanced Brand targeting with deidentified customer data in RMN clean room Brand receives aggregate reporting back	Brand imports limited PI into RMN clean room (e.g., hashed emails) More enhanced Brand targeting with matching RMN customer data Different privacy approaches are possible (e.g., disclosure with express consent, opt-out honored by RMN and Brand) – varies by jurisdiction Brand receives aggregate reporting back	Brand imports customer data into RMN clean room Most enhanced Brand targeting with matching RMN customer data (combined set of attributes) Different privacy approaches are possible (e.g., disclosure with express consent, opt-out honored by RMN and Brand) – varies by jurisdiction Brand receives aggregate <u>and customer-level</u> data reporting
Low impact on privacy programs	Low impact on privacy programs	High impact on privacy programs	High impact on privacy programs

A shared operating model for retail media

Useful customer experiences supported by lawful, explainable data use

Marketing

- Defines the customer use case and success measure
- Documents the audience, channel and intended data use
- Engages partners only through approved paths

Technology and data

- Translates the use case into data flows and controls
- Owns tag, identity, access and RMN technical implementation
- Provides test evidence and production monitoring

Privacy, legal and security

- Interprets purpose, role and consent requirements
- Reviews contracts and vendor controls
- Defines risk thresholds and approves exceptions

Common objectives and measures, one intake and approval path, job shadowing and shared training, with clear escalation and decision rights

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How Did Things Go? (We Really Want To Know)

Did you enjoy this session? Is there any way we could make it better? Let us know by filling out a speaker evaluation.

1. Open the IAPP Events app.
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5. Once you've answered all three questions, tap "Done".

Thank you!

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