

How to exercise your rights on your data!

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Outline

- 1. Part 1 – see extra slides 2019-Boniface.pdf**
- 2. Exercising SAR on Web trackers**
- 3. Recommendations and conclusions**

Implementations of Authentication on 50 popular websites

- We identified 27 companies that own top 50 domains

Total number of domains	27
Privacy policies with SAR procedures	19
Require copy of a national ID card	7 (37%)
Already have a copy of an ID card	0
Provide direct access to data	11 (58%)

**EXERCISE YOUR OWN RIGHT
NOW!**

Exercise 1: Your location

- Google stores your location (if you have it turned on) every time you turn on your phone, and you can see a timeline from the first day you started using Google on your phone
- Open your Google location history:
- <https://www.google.com/maps/timeline?pb>

Cronologia 🔒 OGGI

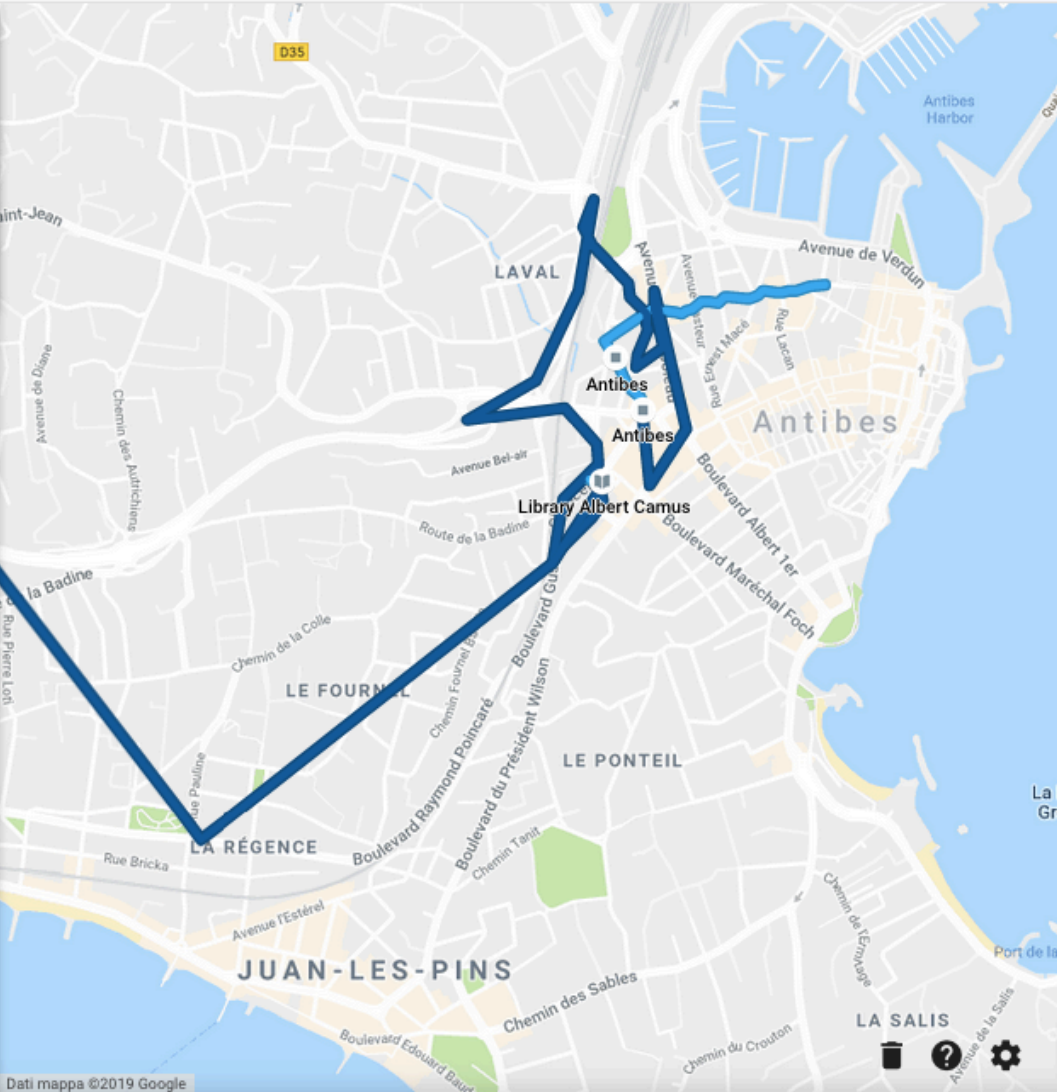
2019 ▾ aprile ▾ 6 ▾

Antibes < > 🗑️

Sabato 6 Aprile 2019

2,8 km / 37 m 2,8 km / 15 m 750 m / 14 m

- Hai camminato - 550 m 11 min
- 15.14 - 15.20 ⋮
- Hai camminato - 130 m 1 min



Antibes 27 mar – 06 apr 2019	27 mercoledì marzo 2019	28 giovedì marzo 2019	29 venerdì marzo 2019	30 sabato marzo 2019	31 domenica marzo 2019	01 lunedì aprile
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Exercise 2: Your activity

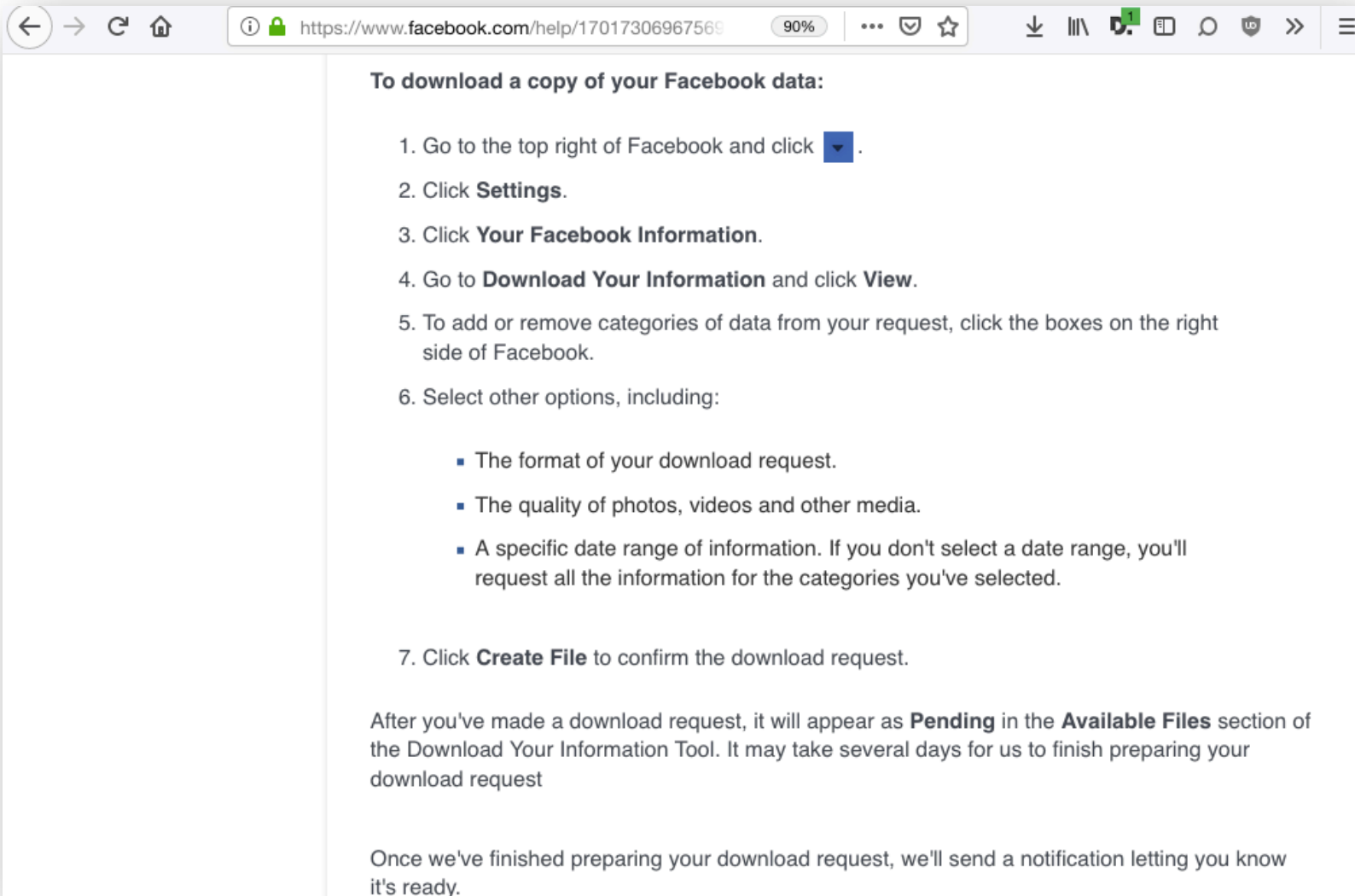
- Google stores search history across all your devices on a separate database
- Open your Google activity:
- <https://myactivity.google.com/myactivity>

More exercises for Google

- Google advertisement profile:
 - <http://www.google.com/settings/ads/>
- App and extensions permissions:
 - <https://myaccount.google.com/permissions/?pli=1>
- Youtube history:
 - https://www.youtube.com/feed/history/search_history
- All the data Google stores about you:
- <https://takeout.google.com/settings/takeout>


Facebook:

<https://www.facebook.com/help/1701730696756992>



The image is a screenshot of a web browser displaying a help page from Facebook. The browser's address bar shows the URL <https://www.facebook.com/help/1701730696756992>. The page content is titled "To download a copy of your Facebook data:" and contains a numbered list of seven steps. Step 6 includes a bulleted list of options. Below the list, there are two paragraphs of text explaining the status of the download request and the notification process.

To download a copy of your Facebook data:

1. Go to the top right of Facebook and click .
2. Click **Settings**.
3. Click **Your Facebook Information**.
4. Go to **Download Your Information** and click **View**.
5. To add or remove categories of data from your request, click the boxes on the right side of Facebook.
6. Select other options, including:
 - The format of your download request.
 - The quality of photos, videos and other media.
 - A specific date range of information. If you don't select a date range, you'll request all the information for the categories you've selected.
7. Click **Create File** to confirm the download request.

After you've made a download request, it will appear as **Pending** in the **Available Files** section of the Download Your Information Tool. It may take several days for us to finish preparing your download request

Once we've finished preparing your download request, we'll send a notification letting you know it's ready.

EXERCISING SAR ON THIRD- PARTY TRACKERS

Are third parties responsible and need to respond to SAR?



29WP (2010): **advertising network providers** are **joint controllers** and should provide SAR



Article 26 GDPR states joint controllers should distribute responsibilities amongst them, by means of an arrangement , e.g.. By designating a contact point for data subjects. Also, **data subjects may exercise SAR against each of the controllers**

Are third parties responsible and need to respond to SAR?



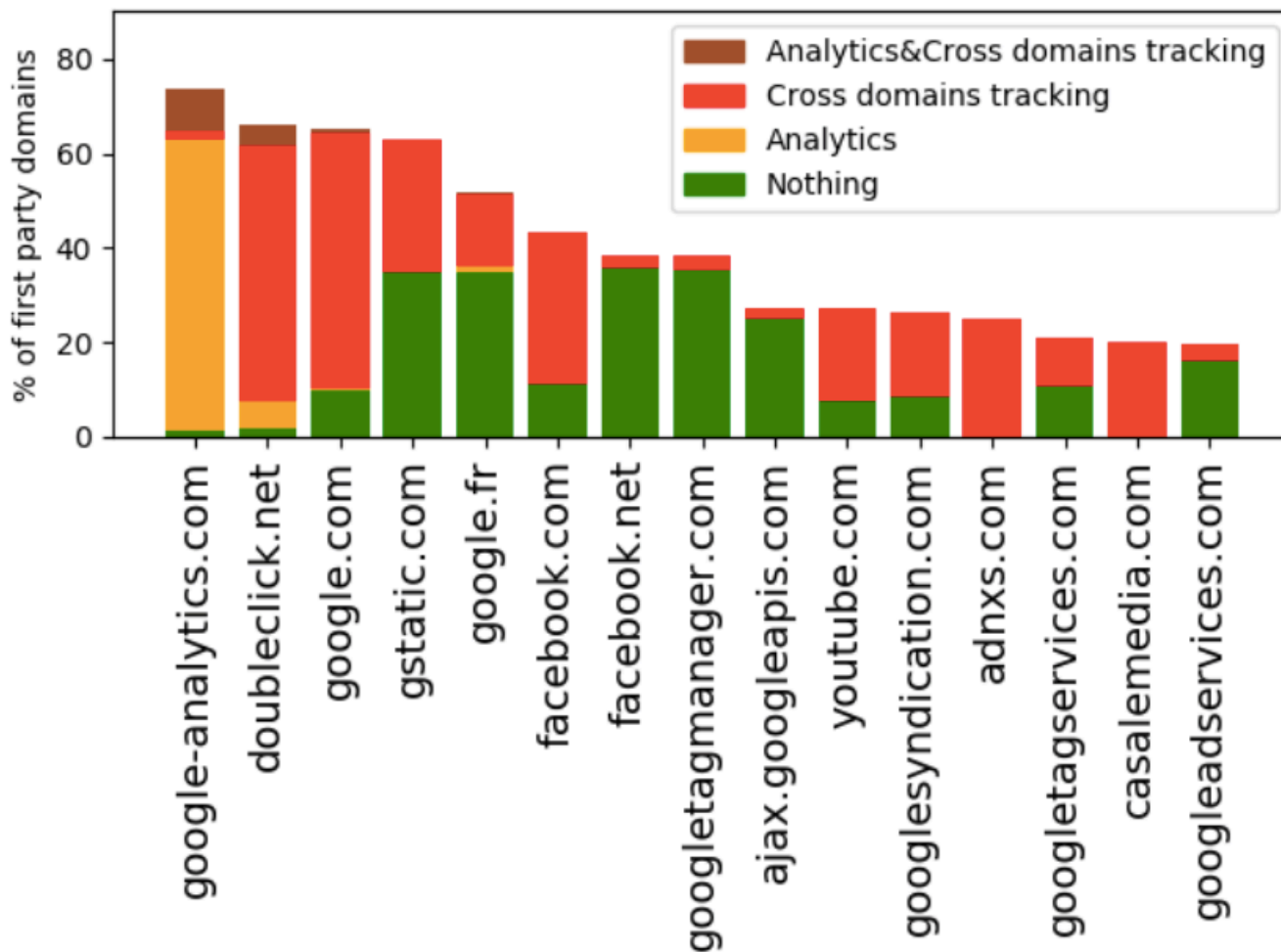
Court of Justice of the EU decision of Wirtschaftsakademie

*“a data subject can direct a SAR to the website administrator, irrespective of the fact that the personal data is collected through the use of cookies by **Facebook** and the administrator has no access to data. The administrator could solve this practically by redirecting the request to Facebook. However, if Facebook would not adequately comply, the organization integrating their plugin may also be held accountable”*

- **Conclusion:** Third Party Trackers are joint controllers and cannot refuse SAR

Exercising SAR on 30 popular third party trackers

- 1 Preliminary crawling: 829,349 pages from 84K domains
- 2 Detected top 30 third party trackers



How third parties let me exercise my rights?

Top 30 trackers evaluation criteria

Is it clear how to exercise my access rights?



Is there a clear way to exercise our right? DPO contact info?

Authentication of data subject



Is it enough to provide cookies/mobile ID used for tracking or they require a national ID card?

Simplicity



Is there a direct access to my data on a platform or should I send an email?

Results of exercising subject access requests

Third-party tracker	Authentication					Simplicity	
	Online identifier		Other data			Direct access	email
	Cookies	Mobile ID	Name and surname	Email	ID card		
Google domains	∅	∅	∅	∅	∅	∅	∅
facebook.com	∅	∅	∅	∅	∅	∅	∅
adnxs.com	✓	✓	×	×	×	✓	×
casalemedia.com	∅	∅	∅	∅	∅	∅	∅
openx.com	∅	∅	∅	∅	∅	∅	∅
pubmatic.com	✓	✓	✓	✓	✓ ¹	×	✓
smartadserver.com	✓	×	×	✓	×	×	✓

¹pubmatic.com also asks for a witness to sign a form and provide his ID card as well!

Exercising SAR on 30 popular third party trackers

- We identified 25 companies that own top 30 third-party tracking domains

Impossible even to start exercising SAR	4
Not able to get information on how to exercise SAR before we give the data	2
Deny access to third-party data	7
Use third-party cookies as online identifier	12
Require copy of an ID card	4
Direct access without any additional info	2

Segment Data

This page will show you the segments clients and third party providers using the AppNexus platform have associated to your cookie or your mobile advertising ID.

- Show segments associated with the cookie for the browser I am currently using to view this page.
- Show segments associated with my mobile advertising ID for ads in mobile applications (Identifier for Advertising (IDFA) for iOS devices, Google Advertising ID (AAID) for Android devices)



I'm not a robot



reCAPTCHA
Privacy - Terms

By clicking below I confirm I am the owner and sole controller of (1) computers running web browsers associated with the "uid" or "uids" cookie values set by the domain adnxs.com and/or (2) devices associated with the mobile advertising ID and I solemnly affirm and certify under penalty of perjury that the foregoing is true and correct.

CONFIRM