



Data Protection Assessment Template



February 2025

IAB Data Protection Assessment Template

Businesses and Controllers are required to conduct data protection assessments for processing activities that pose a heightened risk of harm to consumers, as mandated by applicable U.S. privacy laws. The IAB Data Protection Assessment Template is designed solely for use by participants in the digital advertising industry. It provides a structured approach to help businesses conduct comprehensive assessments and demonstrate compliance. This assessment can be tailored to align with each business's unique operations.

A data protection assessment should be a genuine, thoughtful analysis of each of the Controller's Personal Information Processing activities that presents a heightened risk of harm to a Consumer that:

1. identifies and describes the risks to the rights of consumers associated with the Processing;
2. documents measures considered and taken to address and offset those risks;
3. contemplates the benefits of the Processing; and
4. demonstrates that the benefits of the Processing outweigh the risks offset by safeguards in place.

In order to complete the data protection assessment, you need to involve all relevant internal actors from across your organizational structure and, where appropriate, relevant external parties to identify, assess, and address the data protection risks.

Capitalized terms used, but not defined, in this IAB Data Protection Assessment have the meaning as such term is set forth in the applicable state privacy laws.

This template is for informational purposes only and does not constitute legal advice. It does not guarantee compliance with applicable legal requirements. Businesses should consult with legal counsel to ensure their specific obligations are met.

Data Protection Assessment

Processing Activity(ies): _____

Summary of the Processing activity(ies): _____

Parties Contributing to this Data Protection Assessment¹:

Reviewer: _____

Stakeholder Involvement: _____

Date of Review: _____

Modification to an Existing DPA? _____ (If yes, provide a summary of the material changes to the Processing activity)

No.	Questions	Answers
Trigger		
1.	Trigger. Which activity(ies) triggers this data protection assessment? <i>Select all that apply.</i>	<ul style="list-style-type: none"> ● The Processing of Personal Information for Targeted Advertising ● The Sale² of Personal Information ● Profiling with certain foreseeable risks³ ● The Processing of Sensitive Personal Information
Basic Information		
2.	Personal Information. If the product or service collects Personal Information, which data elements will it collect? <i>Select all that apply.</i>	<ul style="list-style-type: none"> ● First and last name ● Advertiser-specific ID ● IP address ● Cookie ID ● Device ID ● Device profile ● Alternative ID (e.g., RampID, UID2.0) ● IDFA/AAID ● Household ID ● Household address

¹ Relevant internal members and external parties contributing to the data protection assessment.

² Note that “Sale” under the applicable U.S. laws include disclosing data for valuable consideration and is not only limited to monetary exchanges.

³ The Processing of Personal Information for the purposes of Profiling, where such Profiling presents a reasonably foreseeable risk of (A) unfair or deceptive treatment of, or unlawful disparate impact on, consumers, (B) financial, physical or reputational injury to consumers, (C) a physical or other intrusion upon the solitude or seclusion, or the private affairs or concerns, of consumers, where such intrusion would be offensive to a reasonable person, or (D) other substantial injury to consumers.

No.	Questions	Answers
		<ul style="list-style-type: none"> ● Email address ● Phone number ● Other: [FREE TEXT]
3.	<p>Categories of Personal Information. Which categories of Personal Information will the product or service collect or process? <i>Select all that apply and specify what Personal Information is involved.</i></p>	<ul style="list-style-type: none"> ● Identification information (e.g., name, alias, address, phone number, email address, or pseudonymized ID) ● Commercial information (e.g., purchase history): [FREE TEXT] ● Online activities information (e.g., browsing history, search history, etc.): [FREE TEXT] ● Geolocation data: [FREE TEXT] ● Audio, electronic, video, or image information: [FREE TEXT] ● Professional or employment-related information: [FREE TEXT] ● Protected class information under state or federal laws (e.g., age, gender, and family status): [FREE TEXT] ● Education information: [FREE TEXT] ● Inferences or preferences: [FREE TEXT] ● Other: [FREE TEXT]
4.	<p>Sensitive Personal Information. Will the product or service use any of the following attributes for targeting? <i>Select all that apply.</i></p>	<ul style="list-style-type: none"> ● Religious beliefs ● Racial or ethnic origin ● Political beliefs ● Medical or health information ● Personal Information of Minors Under 13 ● Personal Information of Minors 13 to under 16 ● Personal Information of Minors 16 to under 17 ● Personal Information of Minors 17 to under 18 ● Sexual Orientation ● Sex Life ● Sexuality ● Transgender/nonbinary status ● Citizenship or immigration status ● Genetic data ● Biometric data used for unique

No.	Questions	Answers
		identification <ul style="list-style-type: none"> ● Precise Geolocation (2+ decimals) ● Status as a victim of crime ● Union membership ● Contents of communications ● Nation of origin ● Payment card of financial account information ● None of the above
5.	Relationship Between the Party and the Consumer. What is the relationship between your company and the individual whose Personal Information is being Processed?	<ul style="list-style-type: none"> ● The company has a direct, first-party relationship as a Publisher ● The company has a direct, first-party relationship as an Advertiser ● No direct relationship. Another Business “Sold” the Personal Information to my company
6.	Sources of Personal Information. Please describe the sources of Personal Information used for this Processing Activity.	<ul style="list-style-type: none"> ● Data is collected by a business directly from Consumers, [Free text box: Please add more details] ● Data is purchased from a third-party data supplier (e.g., data broker, partner from a direct deal). [Free text box: Please add more details] ● Other. [Free text box: Please add more details]
7.	Technology Used. What are the mechanisms by which you will receive the Personal Information? <i>Select all that apply.</i>	<ul style="list-style-type: none"> ● sFTP, S3 bucket, Blob storage, or similar storage type. ● API ● Pixel ● Cookie ● SDKs ● In-House Data Clean Room ● Third-Party Data Clean Room ● Other: [Free text box: Please describe] ● None of the Above

No.	Questions	Answers
8.	<p>Names or categories of Personal Information recipients. What is the category(ies) of the Third Parties, Affiliates, and Processors with whom you share Personal Information or make Personal Information available to under this Processing activity(ies)? <i>Select all that apply.</i></p>	<ul style="list-style-type: none"> ● An affiliate, joint vendor, or business partner that is considered a “business” or “controller” under the state law ● DSP ● SSP ● Ad Measurement Vendor ● Publisher (e.g., social media company, CTV, media outlet in a direct deal) ● Advertiser (i.e., advertiser in a direct deal) ● Ad fraud prevention vendor ● Data broker ● Identity Resolution Vendor ● IT services ● Point of interest resolution vendor ● Creative ad server ● Advertiser's agency ● Other: [FREE TEXT] ● None of the Above
9.	<p>Data Location. Is any vendor Processing Personal Information controlled by a foreign adversary as defined in the Protecting Americans’ Data from Foreign Adversaries Act of 2024 (PADFAA)?⁴ <i>Select all that apply.</i></p>	<ul style="list-style-type: none"> ● China (including Hong Kong and Macau) ● Cuba ● Iran ● North Korea ● Russia ● Venezuela ● None of the Above
10.	<p>Purpose of Processing. For each category of the personal data recipients above, please provide a summary of the Processing purpose(s) for which the personal information will be provided to these recipients.</p> <p><i>E.g., We would like to engage Acme Ads to assist with retargeting. Acme Ads would place their pixel on our web properties.</i></p>	[FREE TEXT]
11.	Describe the categorical compliance Processes that the Controller uses to	[FREE TEXT]

⁴ Refer to IAB PADFAA Diligence Module for detailed due diligence questions.

No.	Questions	Answers
	evaluate that type of recipient.	
12.	Will the Personal Information be used for any of the following purposes? <i>Select all that apply.</i>	<ul style="list-style-type: none"> ● Enhancement of the business’s identity graph ● Creation or enhancement of DSP internal segments (whether those segments are created internally or received from third parties) ● Creation or enhancement of the business’s user/device profiles ● Enhancing of the business’s targeting/bidding algorithm ● Other: [FREE TEXT] ● None of the above
13.	<p>Data Flow. Please outline the data flow of the service or product.</p> <p>Please attach any diagrams or supplemental materials, if available.</p>	<p>Upload the data flow contextual diagram. [FREE TEXT: Please add further information]</p>
14.	<p>Consent. If the Processing activities involve Sensitive Personal Information listed in question 4, how do you ensure that you have the appropriate Consent for collection, use and subsequent sharing? <i>Select all that apply.</i></p>	<ul style="list-style-type: none"> ● Global Privacy Platform technical specification ● Representation and warranty from disclosing party ● Surface our own consent request on the Advertiser’s property ● Review the Advertiser’s consent request that it surfaces on its property ● Other: _____ ● N/A, we don’t Process Sensitive Personal Information.
15.	<p>Reasonable Expectation of the Consumer. As a Business or Controller that has a direct relationship with the Consumer, please explain how the evaluated activity is aligned with the reasonable expectations of the consumer. <i>Select all that apply, and note you have to satisfy one, but not all of the prongs in the answers.</i></p>	<ul style="list-style-type: none"> ● The collection and use of personal information is for achieving the purposes for which the Personal Information was collected or Processed based on the following: <ul style="list-style-type: none"> - The relationship between the consumer(s) and the business (e.g., the consumer intentionally interacts with the business to purchase the goods or services)

No.	Questions	Answers
		<ul style="list-style-type: none"> - The type, nature, and amount of Personal Information that the business seeks to collect or process - The source of the Personal Information and the business's method for collecting or processing it. - The specificity, explicitness, prominence, and clarity of disclosures to the consumer(s) about the purpose for collecting or processing their personal information (e.g., just-in-time notice, specific reference to the intended purposes, etc.) - The degree to which the involvement of service providers, contractors, third parties, or other entities in the collecting or processing of Personal Information is apparent to the consumer(s). <p style="text-align: center;">[Free Text Explanation]</p> <ul style="list-style-type: none"> • The collection and use of Personal Information is for achieving another disclosed purpose that is <u>compatible</u> with the context in which the Personal Information was collected <ul style="list-style-type: none"> - Whether this additional purpose has a strong link with the purpose for which Personal Information was collected or Processed (i.e., will this purpose surprise the consumer?) <p style="text-align: center;">[Free Text Explanation]</p> <ul style="list-style-type: none"> • If you seek to collect or Process Personal Information that's neither for the purposes for which the Personal Information was

No.	Questions	Answers
		<p>collected nor compatible with that purpose (in other words, it surprises the consumer), how is the consent obtained? [Free Text Explanation]</p> <ul style="list-style-type: none"> • We do not have a direct relationship with the Consumer.
16.	<p>Reasonable Expectation of the Consumer. As a Business or Controller that does not have a direct relationship with the Consumer, please explain how the evaluated activity is aligned with the reasonable expectations of the consumer. <i>Select all that apply.</i></p>	<ul style="list-style-type: none"> • We have contractual measures in place with our data suppliers' participants to ensure that Personal Information was collected and sold to us in compliance with Item 6's requirements. • We have conducted due diligence on data suppliers to ensure that Personal Information was collected and sold to us in compliance with Item 6's requirements. • As a Third Party, our privacy statement clearly disclosed the Processing Activity: [Free Text Box to paste the relevant disclosure] • We have a direct relationship with the Consumer.
Risk / Benefit Analysis		
17.	<p>Benefit to the Business/Controller (e.g., revenue, cost saving, reputation). <i>Select all that apply.</i></p>	<ul style="list-style-type: none"> • Revenue increase: [Free Text: explain] • Cost saving: [Free Text: explain] • Reputation improvement/maintenance: [Free Text: explain] • Customer satisfaction: [Free Text: explain] • Compliance: [Free Text: explain] • Other: [Free Text: explain]
18.	<p>Benefit to the Consumer (e.g., tailored advertising, financial savings). <i>Select all that apply.</i></p>	<ul style="list-style-type: none"> • Obtain tailored advertising relevant to him/her: [Free Text: explain]

No.	Questions	Answers
		<ul style="list-style-type: none"> ● Reduced annoyance and interruptions with irrelevant advertising: [Free Text: explain] ● Obtain discounted products/services from advertisers: [Free Text: explain] ● Access to free or discounted digital content from publishers: [Free Text: explain] ● Other: [Free Text: explain]
19.	Benefit to other stakeholders (e.g., revenue, cost saving, reputation). <i>Select all that apply.</i>	<ul style="list-style-type: none"> ● Maintain business partner relationship: [Free Text: explain] ● Better return on investment and cost reduction for advertisers ● Return shareholder value: [Free Text: explain] ● Other: [Free Text: explain]
20.	Benefit to the public (e.g., equality, reduction of discrimination). <i>Select all that apply.</i>	<ul style="list-style-type: none"> ● Provide free or low-cost access to news media and online platforms: [Free Text: explain] ● Provide relevant product or service recommendations to consumers: [Free Text: explain] ● Provide and maintain a lower barrier of entry for small media ● Provide and maintain a lower barrier of entry for small advertisers to market their product to their consumer segments ● Other: [Free Text: explain]
21.	Risk to the right of the Consumer . Analyze the potential risks for any of the categories below. <i>Select all that apply.</i>	<ul style="list-style-type: none"> ● Constitutional harm ● Intellectual privacy harms, such as the creation of negative inferences about an individual based on what an individual reads, learns, or debates ● Data security harms ● Discrimination harms ● Unfair, unconscionable, or deceptive treatment ● A negative outcome or decision with respect to an individual's eligibility for a

No.	Questions	Answers
		<p>right, privilege, or benefit related to financial or lending services, housing, insurance, education enrollment or opportunity, criminal justice, employment opportunities, healthcare services, or access to essential goods or services;</p> <ul style="list-style-type: none"> ● Financial injury or economic harm ● Physical injury, harassment, or threat to an individual or property; ● Privacy harms ● Psychological harm ● Other detrimental or negative consequences that affect an individual's private life, private affairs, private family matters, or similar concerns ● Other: [Free Text: explain]
22.	<p>Risk Mitigation—Data Minimization. Please explain the necessity and proportionality of Processing in relation to the stated purpose of the Processing. The note that the stated purpose should be consistent with the consumer's reasonable expectations. <i>Select all that apply.</i></p> <p><i>Helpful tip: is it possible to target based on fewer data elements?</i></p>	<ul style="list-style-type: none"> ● We only collect necessary data attributes to enable the intended purposes that have been disclosed to consumers and are aligned with reasonable expectations of the consumers. [Free Text: explain] ● We only retain personal data for a reasonable period of time. [Free Text: explain and potentially cite the relevant data retention policy section] ● We use encryption, hashing, or other data pseudonymization technologies to reduce raw personal data proliferation. [Free Text: explain]
23.	<p>Risk Mitigation—De-Identification. Will you undertake any steps to De-Identify the Personal Information that is used for the product or service? <i>Select all that apply.</i></p>	<ul style="list-style-type: none"> ● Yes, we use synthetic data, which generates artificial data that has similar statistical properties to the original data ● Yes, we use k-anonymity, which ensures that each individual in a dataset is indistinguishable from at least "k" other individuals. This makes it harder for someone to re-identify an individual

No.	Questions	Answers
		<ul style="list-style-type: none"> ● Yes, we leverage differential privacy, which injects noise into the data designed to mathematically enhance privacy protection ● Yes, we use perturbation, which replaces sensitive information with realistic but inauthentic data ● No, we don't de-identify any Personal Information. ● Other: [FREE TEXT]
24.	<p>Risk Mitigation—Data Security. Please describe the data security measures used. <i>Select all that apply.</i></p>	<ul style="list-style-type: none"> ● We adopt administrative controls, including access control, data classification, security training, data incident response planning, and third-party risk management. [Free Text: link to the relevant organizational security policies] ● We adopt technical controls, including encryption, hashing, tokenization, firewalls, intrusion detection, anti-malware software, data loss prevention monitoring, and vulnerability scanning. [Free Text: link to the relevant organizational security policies] ● We adopt physical controls, including facility access controls, data backup, end-point security, and media disposal protocols. [Free Text: link to the relevant organizational security policies] ● Other: [Free text: explain]
25.	<p>Risk Mitigation—Consumer Rights to Personal Information. Please describe the measures taken to satisfy consumer privacy rights, including access, deletion, correction or opting out of certain processing of personal information. <i>Select all that apply.</i></p>	<ul style="list-style-type: none"> ● Consumers are notified of their privacy rights in the privacy statement ● Consumers can exercise privacy rights through a toll-free number provided by the company ● Consumers can exercise privacy rights on the company website

No.	Questions	Answers
		<ul style="list-style-type: none"> ● Consumers can exercise privacy rights through an email provided by the company ● Consumers can exercise privacy rights at the company’s physical location ● Consumers can utilize global opt-out or universal opt-out as defined under the applicable state privacy laws to opt out of sale, sharing, or targeted advertising ● Other: [Free text: explain]
26.	<p>Risk Mitigation—Contracts. Please describe the contractual agreements in place to ensure that Personal Information in the possession of a Processor or other Third Party remains secure.</p>	<ul style="list-style-type: none"> ● The company is a signatory of the IAB Multi-State Privacy Agreement. ● The data protection agreement between the parties contains necessary privacy and security provisions. [Upload agreement]. ● Other: [Free text: explain]
27.	<p>Risk Mitigation. Please describe any other practices, policies, or training intended to mitigate Processing risks.</p>	[FREE TEXT]
28.	<p>Risk/Benefit Analysis Conclusion. Do the benefits of Processing outweigh the risks offset by the risk mitigation measures?</p>	<ul style="list-style-type: none"> ● Yes ● No

Please also complete the following section if the Processing Activities include Profiling. If not, please skip this section :

Additional Data Protection Assessment for Profiling		
1.	Risks. Does Profiling present a reasonably foreseeable risk of unfair or deceptive treatment ⁵ of or unlawful disparate impact ⁶ on Consumers?	<ul style="list-style-type: none"> ● Yes, and please explain why [FREE TEXT] ● No, and please briefly explain your rationale [FREE TEXT]
2.	Risks. Does Profiling present a reasonably foreseeable risk of financial or physical injury to Consumers?	<ul style="list-style-type: none"> ● Yes, and please explain why [FREE TEXT] ● No, and please briefly explain your rationale [FREE TEXT]
3.	Risks. Does Profiling present a reasonably foreseeable risk of physical or other intrusion upon the solitude or seclusion, or private affairs or concerns, of Consumers if the intrusion would be offensive to a reasonable person?	<ul style="list-style-type: none"> ● Yes, and please explain why [FREE TEXT] ● No, and please briefly explain your rationale [FREE TEXT]
4.	Risks. Does Profiling present a reasonably foreseeable risk of other substantial injury to Consumers?	<ul style="list-style-type: none"> ● Yes, and please explain why [FREE TEXT] ● No, and please briefly explain your rationale [FREE TEXT]
5.	Personal Information Used for Profiling. Please describe the specific types of Personal Information that were or will be used in Profiling or decision-making process.	<ul style="list-style-type: none"> ● Identification information (e.g. name, alias, address, phone number, email address, or pseudonymized ID) ● Commercial information (e.g. purchase history) ● Online activities information, (e.g. browsing history, search history, etc.) ● Geolocation data ● Audio, electronic, video or image information ● Professional or employment-related information ● Protected class information under state or federal laws (e.g. age, gender, and family status) ● Education information ● Inferences or preferences

⁵ “Unfair or deceptive treatment” includes conduct or activity which violates state or federal laws that prohibit unfair and deceptive commercial practices.

⁶ “Unlawful disparate impact” includes conduct or activity which violates state or federal laws that prohibit unlawful discrimination against Consumers.

		<ul style="list-style-type: none"> ● Other: [FREE TEXT] ● None of the above
6.	Describe the decision to be made using Profiling (e.g., infer consumer preferences or segments).	[FREE TEXT]
7.	Describe the benefits of automated Processing over manual processing for the stated purpose.	[FREE TEXT]
8.	An explanation of the training data and logic used to create the Profiling system, including any statistics used in the analysis, either created by the Controller or provided by a Third Party that created the applicable Profiling system or software. A plain language explanation of why the Profiling directly and reasonably relates to the Controller's goods and services.	[FREE TEXT]
9.	If the Profiling is conducted by vendor software purchased by the Controller, the name of the software and copies of any internal or external evaluations for the third-party software performing Profiling sufficient to demonstrate the accuracy and reliability of the software where relevant to the risks.	[FREE TEXT]
10.	A plain language description of the outputs secured from the Profiling process.	[FREE TEXT]
11.	A plain language description of how the outputs from the Profiling process are or will be used, including whether and how they are used to make a decision to provide or deny or substantially contribute to the provision or denial of	[FREE TEXT]

	financial or lending services, housing, insurance, education, enrollment or opportunity, criminal justice, employment opportunities, health-care services, or access to essential goods or services.	
12.	If there is human involvement in the Profiling process, explain the degree and details of any human involvement.	[FREE TEXT]
13.	Explain how the profiling system is evaluated for fairness and disparate impact, as well as the results of any such evaluation.	[FREE TEXT]
14.	Outline safeguards used to reduce the risk of harm identified.	[FREE TEXT]
15.	Safeguards for any data sets produced by or derived from the Profiling.	[FREE TEXT]

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