Call to action against surveillance-based advertising

Surveillance-based advertising permeates the internet today, creating a number of highly problematic issues for both consumers and for businesses. We are writing to you in order to ask for action on this issue on both sides of the Atlantic. In the EU, we urge you to consider a ban on surveillance-based advertising as a part of the Digital Services Act. In the US, we urge legislators to enact comprehensive privacy legislation.

We are a broad coalition of consumer rights organizations, civil rights groups, NGOs, and academics who share a number of concerns regarding the surveillance-based business model fuelling the majority of online advertising. In order to individualize and personalize digital advertising, we have seen the rise of a surveillance economy where everything consumers do is being tracked both online and offline, aggregated and shared.

The surveillance economy is sometimes erroneously presented as a trade-off, where consumers allow companies to track them in order to receive access to digital content. As the attached report by the Norwegian Consumer Council shows, a majority of consumers do not wish to be tracked online. However, the ubiquity of commercial surveillance means that it is practically impossible to avoid being tracked, profiled and targeted.

In addition to the clear privacy issues caused by surveillance-based advertising, systematic commercial surveillance also gives rise to and exacerbates a number of other problematic practices. As shown in the attached report, the surveillance-based advertising model facilitates systemic manipulation and discrimination, poses serious national security risks, funds disinformation and fraud, while also undermining competition and taking revenue away from content creators. This harms consumers and businesses, and can undermine the cornerstones of democracy.

Although we recognize that advertising is an important source of revenue for content creators and publishers online, this does not justify the massive commercial surveillance systems set up in attempts to "show the right ad to the right people". Other forms of advertising technologies exist, which do not depend on spying on consumers, and cases have shown that such alternative models can be implemented without significantly affecting revenue.

There is no fair trade-off in the current surveillance-based advertising system. We encourage you to take a stand and consider a ban of surveillance-based advertising as part of the Digital Services Act in the EU, and the for U.S. to enact a long overdue federal privacy law.





























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PARENT COAUTION FOR STUDENT PRIVACY





KREFTFORENINGEN







PUBLICCITIZEN







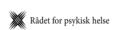




























Name of organisations in alphabetical order:

Accountable Tech, US

ASUFIN, ES

BEUC - the European Consumer Organisation

CDD (Center for Digital Democracy), US

Civil Liberties Union for Europe, EU

CO-CREATE Youth Task Force, NO

Consumer Action, US

Consumer Council Northern Ireland, UK

Consumer Federation of America (CFA), US

Consumers' Organisation of Macedonia, MK

Consumers' Union of Finland / Kuluttajaliitto -Konsumentförbundet ry, FI

Cracked Labs - Institute for Critical Digital Culture, AT

Data Ethics, DK

Decode Democracy, US

Department of Nursing and Health Promotion, OsloMet – Oslo Metropolitan / Avdeling for ernæring, NO

Deutsche Vereinigung für Datenschutz, DE

DFRI (Föreningen för Digitala Fri- och Rättigheter), SK

DefendDigitalMe

Državljan D / Citizen D, SI

dTest, CZ

EDRi (European Digital Rights), EU

EKPIZO, GR

EPIC (Electronic Privacy Information Center), US

Fairplay, US

Fight for the Future, US

Ghaqda tal-Konsumaturi / Consumers'

Association Malta, MT

Global Action Plan, UK

Homo Digitalis, GR

ICCL (Irish Council for Civil Liberties), IE 5Rights Foundation, UK KEPKA - Consumers' Protection Center, GR LPIAA (Latvia Consumer Association), LV **Individual signatures:** New Economics Foundation, UK Andra Siibak, PhD, Professor of Media Studies, Institute of Social Studies, University of Tartu, EE Neytendasamtökin, IS Aram Sinnreich, Professor, American University Nordic Privacy Center, SE SOC, US Norwegian Cancer Society / Kreftforeningen, NO Bår Stenvik, Author, NO Norwegian Consumer Council / Bruce Schneier, Fellow and Lecturer, Harvard Forbrukerrådet, NO Kennedy School, US Christian Butenschøn, Founder and CEO Open MIC (Open Media and Information Companies Initiative), US Christian Greftegreff Falch, Design Activist, slikvirkerdet.no, NO ORG (Open Rights Group), UK Dag Hareide, Author, NO Panoptykon, PL Douwe Korff, Emeritus Professor of Human Press Save the Children Youth Association / Rights and International Law, NL & UK Press - Redd Barna Ungdom, NO Dr. Amandine Garde, Professor of Law, Privacy International, UK University of Liverpool, UK Public Citizen, US Dr. Elinor Carmi, Postdoc Research Associate -Digital Media & Society, Liverpool University, UK. Ranking Digital Rights, US Dr. Emma Boyland, senior lecturer, Psychology, Save the Children Norway / Redd Barna, UK University of Liverpool, UK Dr. Knut-Inge Klepp, Project Coordinator CO-Selbstbestimmt.Digital, DE CREATE, Norwegian Institute of Public Health, Spoločnosť ochrany spotrebiteľov (S.O.S.) NO Sveriges Konsumenter, SE Dr. Mimi Tatlow-Golden, Co-Director, Centre for Children and Young People's Wellbeing, The The Center for Economic Justice, US Open University, UK The National Association for Heart and Lung Eivind Arvesen, Group Cyber Security Manager, Disorders (LHL) / Landsforeningen for hjerte- og NO lungesyke, NO Gloria González Fuster, Research Professor, Vrije The Norwegian Council for Mental Health Universiteit Brussel (VUB), BE (NCMH) / Rådet for psykisk helse, NO Hilde Wisløff Nagell, Tankesmien Agenda, NO The Norwegian Diabetes Association / Ian Brown, Expert

Jef Ausloos, University of Amsterdam (IViR) & KU

Johannes Brodwall, Principal software engineer,

Joris Van Hoboken, Professor of Law at the Vrije

Leuven (CiTiP), NL

Sopra Steria, NO

Universiteit Brussels (VUB), BE

Diabetesforundet, NO

The Parent Coalition for Student Privacy, US

UNICEF Norway, NO

US PIRG, US

Verbraucherzentrale Bundesverband (VZBV), DE

Mie Oehlenschläger, External Lecturer, Independent Consultant, Tech & Childhood, DK

Pat Walshe, Privacy Matters, UK

Pia Tesdorf, Dataprotection, Writer & Educator, DK

Pierre Dewitte, Researcher, KU Leuven Centre for IT & IP Law – imec, BE

Rie Aleksandra Walle, Educator and privacy & human rights enthusiast, NO

Simen Sommerfelt, Author of book "GDPR i praksis", NO

Stefania Milan, PhD, Associate Professor of New Media and Digital Culture, University of Amsterdam, NL

Trond Arve Wasskog, CTO Bekk Consulting, NO