

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.



Signed

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
KEPKA - Consumers' Protection Center, GR
LPIAA (Latvia Consumer Association), LV
New Economics Foundation, UK
Neytendasamtökin, IS
Nordic Privacy Center, SE
Norwegian Cancer Society / Kreftforeningen, NO
Norwegian Consumer Council /
Forbrukerrådet, NO
Open MIC (Open Media and Information
Companies Initiative), US
ORG (Open Rights Group), UK
Panoptikon, PL
Press Save the Children Youth Association /
Press - Redd Barna Ungdom, NO
Privacy International, UK
Public Citizen, US
Ranking Digital Rights, US
Save the Children Norway / Redd Barna, UK
Selbstbestimmt.Digital, DE
Spoločnosť ochrany spotrebiteľov (S.O.S.)
Sveriges Konsumenter, SE
The Center for Economic Justice, US
The National Association for Heart and Lung
Disorders (LHL) / Landsforeningen for hjerte- og
lungesyke, NO
The Norwegian Council for Mental Health
(NCMH) / Rådet for psykisk helse, NO
The Norwegian Diabetes Association /
Diabetesforbundet, NO
The Parent Coalition for Student Privacy, US
UNICEF Norway, NO
US PIRG, US
Verbraucherzentrale Bundesverband (VZBV), DE

5Rights Foundation, UK

Individual signatures:

Andra Siibak, PhD, Professor of Media Studies,
Institute of Social Studies, University of Tartu, EE

Aram Sinnreich, Professor, American University
SOC, US

Bår Stenvik, Author, NO

Bruce Schneier, Fellow and Lecturer, Harvard
Kennedy School, US

Christian Butenschøn, Founder and CEO

Christian Greftegreff Falch, Design Activist,
slikvirkerdet.no, NO

Dag Hareide, Author, NO

Douwe Korff, Emeritus Professor of Human
Rights and International Law, NL & UK

Dr. Amandine Garde, Professor of Law,
University of Liverpool, UK

Dr. Elinor Carmi, Postdoc Research Associate -
Digital Media & Society, Liverpool University, UK.

Dr. Emma Boyland, senior lecturer, Psychology,
University of Liverpool, UK

Dr. Knut-Inge Klepp, Project Coordinator CO-
CREATE, Norwegian Institute of Public Health,
NO

Dr. Mimi Tatlow-Golden, Co-Director, Centre for
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Open University, UK

Eivind Arvesen, Group Cyber Security Manager,
NO

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Hilde Wisløff Nagell, Tankesmien Agenda, NO

Ian Brown, Expert

Jef Ausloos, University of Amsterdam (IViR) & KU
Leuven (CiTiP), NL

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Independent Consultant, Tech & Childhood, DK

Pat Walshe, Privacy Matters, UK

Pia Tesdorf, Dataprotection, Writer & Educator,
DK

Pierre Dewitte, Researcher, KU Leuven Centre
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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
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Trond Arve Wasskog, CTO Bekk Consulting, NO