



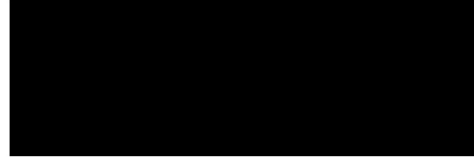
Dr. Oetker United Kingdom

Dr. Oetker (UK) Limited, 4600 Park Approach, Thorpe Park, Leeds, LS15 8GB

PRIVACY INTERNATIONAL



62 Britton Street  
London  
EC1M 5UY



LEEDS, 12.06.2020/CB

12<sup>th</sup> June 2020

*By email only*

Dear 

**Re: Your request for information**

Thank you for your letter of 28<sup>th</sup> May 2020 seeking our comments in relation to your concerns about the online target advertising system. We note that you are focusing in particular on Facebook. We are happy to respond to your request for information on the understanding that you are able to comply with our email to you dated 1<sup>st</sup> June 2020

Dealing with your specific concerns in order:

**Data subject access request – incorrect form sent**

We would like to apologise once again for sending the incorrect form in response to the data subject access request. This was a genuine administrative error on our part. We have a clearly defined process for responding to such requests and unfortunately, on this occasion, a mistake occurred. We can assure you that we have had no further incidences of this happening either before or since. All relevant members of staff have undertaken GDPR training and we ensure that we keep both the training and our policies and processes under review. We are fully committed to meeting all of our data security obligations and we are constantly looking at ways to improve. We welcome any feedback and any suggestions, and we are keen to ensure that we adopt best practice.

**Chicago Town and Dr. Oetker screenshot**

As mentioned to you in our letter of 8<sup>th</sup> November 2019, we have undertaken a full review of the circumstances under which we obtained the personal data and its usage by both our company and our third-party service providers. We have been assured further that none of the data has been forwarded to any third party such as Facebook.

Dr. Oetker (UK) Limited is registered in England with company number 04293376 and VAT number 789 0969 53.

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We contacted Facebook again requesting a more detailed response to your query about the adverts that you received, and this is their reply:

*"The user is looking at the old UI before new custom audience controls were added in January 2020. The old UI would show all of the advertisers using the shared Data File Custom Audiences from Nielsen. In the new UI (current ad preference settings), the user would see Nielsen as the data owner.*

*.....we used to show all advertisers that had the ability to use a list from a third party, even if they didn't upload themselves, but this is no longer the case.*

*Without Nielsen being able to confirm that the user didn't fall into their audiences, then the user could have been shown the ad based off interests from on-platform activity .... or as part of the Nielsen audience set. "*

We contacted Nielsen for their comment and received this response:

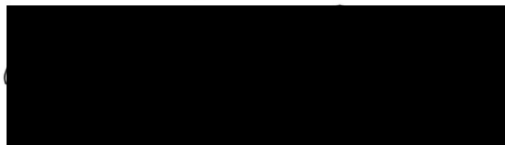
*"The data was sent via our integration to Facebook and consisted of mobile ad id's. No emails were used."*

Given the responses from Facebook and Nielsen, we conclude that the advert will have been sent on the basis that the recipient had been categorised as "interested in pizzas", or "baking" by Facebook. The targeting in question does not use personal data supplied by Dr. Oetker. As stated by Nielsen above, any mobile advertisement identifications are received by Facebook via their direct integration with Nielsen. If you require any further specific information regarding the responses from Facebook and Nielsen, please let me know and I will endeavour to obtain this for you.

We are very keen to ensure transparency in all of our marketing activities and where we can, we will look to make improvements to our activities to ensure fairness for all concerned. We are working on providing guidance to our customers about how they can regulate the use of their personal data on social media platforms and we will be undertaking a review of our privacy policies and use of marketing services taking account of all recent updates from the ICO. We would welcome any suggestions that you might have from your experiences.

If I can help with anything further, please don't hesitate to get back in touch with me.

Yours faithfully,



Head Of Accounting, Compliance & Administration.