

## **What is Digi.me?**

Digi.me enables individuals to share more and better data for more and better value, with 100% privacy, full security and explicit & informed consent.

(Further details will be provided in a supplementary email)

Digi.me enables the individual to gather all their data (inc. health, financial, social media, wearables & other data) into once library they own & control. Digi.me is designed for privacy, and we neither see, touch nor hold any data belonging to an individual, and the digital library is encrypted and securely stored in a location of the users choosing. This privacy & security architecture & implementation has been confirmed separately by both the UK and the Icelandic governments.

Digi.me cannot and does not make money via selling individual's data as we do not see, touch or hold that data. Our revenue comes from acting as a postman and allowing the individual to securely share data with a third party, if they want to. The receiving party, not the individual, being charged a fee of 0.10\$ per share. This is capped at a maximum of 3.00\$ per year per individual per business.

Digi.me has around 60 employees, located mainly in the UK, with a development team in Bosnia, and with operations in several different countries, (Australia, U.S. The Netherlands, Iceland amongst others).

## **Personal Data Today**

Advertising is just one of many uses for Personal Data. This is the most common use, as historically it was quick and provided an easy return. However, there are many other non-advertising uses of data. There, are a vast amount of developing technologies that require additional data, for instance personalised medicine, in banking to develop a better understanding of the customer, and in retail to develop better recommendations for the customer. The All Party Parliamentary Group (APPG) on AI has also recently highlighted the importance of more and better data for AI Development.

Most of these above-mentioned uses are new or developing uses. These uses are not fully supported by today's technology, as the data is in silos isolated from other data on an individual. Secondly the data that is currently available has numerous flaws that are impeding these developments. Currently most data is not deep nor longitudinal in time, and may lack accuracy due to being second hand or inferred, or are miscorrelated (contradicting) with other data. Data is also in need of normalisation into standard formats. Therefore, the current 'stovepipes' of data hinders the development of these new technologies mentioned.

Likewise, despite the perception of Google, Facebook etc of being all seeing and all knowing, they only have a very fragmented picture of the individual. There is only one entity in the system that does allow the connection of all the data, and under GDPR has a right to the data - the individual.

## **Consent & Standards**

When examining solutions for advertising, it is important to bear in mind the wider implications a proposed solution could have on non-advertising uses of data. Current regulation, such as GDPR mandate data portability - the right for an individual to have a copy of their data. In digi.me's opinion legislation should be amended to state that this portability is via a 'well-formed API'. This wording is left deliberately open to interpretation. This lack of specification is due to Julian's (Executive Chairman, Digi.me) experience with military interoperability, agreeing upon and enforcing standards is difficult, time consuming, and often ultimately unworkable. It is more important that

data is made portable so that it can be claimed by an individual, and then companies such as digi.me work out a solution to the problem of interoperability and technical standards. Which we as a company are proactive in doing.

There is also a problem with the current system of consent, which as it stands currently is neither specific nor informed for the consent giver. Data freely given is not an issue in our opinion; for example, if I post on Facebook or search in Google, I do expect them to be used to either tailor adverts or used to optimise web searches. However, tracking often goes beyond this and users are unaware whether they are being tracked and what happens to this tracked & scraped data. Therefore, this does not reach the standard of specific and informed consent.

Moreover, consumers are unable to keep track of whether they have given consent on different devices and browsers; there is no method easily determine what consents are active in today's environment, and then amending/cancelling them subsequently.

For web pages, tracking anonymously to manage the website and understand visitor statistics etc seems reasonable. But where visitors visit a web site transiently, for a page or two, or more specifically not logged in then asking for consent to track is non-sensical and disruptive. The default should be "Do not track" and users should have to opt in and prompts to do so should only be given if logged in, or a more than transitory visit. Likewise being tracked from website to website because I am logged in to an account on a different website (e.g. facebook log in) cannot be considered "explicit and informed" - few outside the tech community would have any understanding of what is being tracked or not.

The IAB provides a tool to allow users to set do not track for their member companies. This tool is essentially unusable however. You have to find the tool first, then it advises its members individually and reports back success/failure and as 100% success seems impossible to achieve what is a user supposed to do then? Furthermore, this do not track indication is only applicable to the browser you use it in, so you have to repeat the activity for each browser on every device you own. And if you delete cookies then you have to go through the process again. This is not a true choice/control mechanism - it is designed to say they are doing something, but not usefully so. Their proposed evolution of this system is to effectively track you more so they can identify a user from device to device - this is an oxymoron; lets us track you more so you can ask us not to track you at all. The default for all web services should clearly be do not track as there is no informed and explicit option that can work by default.

### **The way forward**

The solution for publishers (including Facebook and Google) is to ask for data directly from the consumer. This makes the exchange of data for a good or service explicit. But also, as a solution like digi.me can integrate multiple data sources it can allow publishers to provide better service (i.e. better targeted adverts). Explicit payment for data would also be possible (e.g. see ubdi.com); however, data can also simply be exchanged for value, which may be a service, convenience or reward (for example with Google this is a search service).

When individuals own their data, using data facilitators such as digi.me, any business can ask the user for data. This breaks the data monopolies that exist today and allows a democratisation of data. For example an individual publisher can use the trust they have with an individual to ask for data from that user, evaluate with consent a profile for that user and then ask for (higher value) adverts to match the profile of a specific user(s) - in this case changing the power dynamic from

advertising system provider to publisher (though advertising systems are free to ask the individuals direct too).

Our view is simple. GDPR (and the consequent UK Data Protection Act 2018) should prohibit the uninformed tracking and collection of user data - if this is enforced then providers will be forced to look at alternate sources of data which means asking individuals directly, with explicit and informed consent, if targeted adverts (or other targeted services) are required.

### **Explicit & Informed Consent**

There is a view that no consent can be both explicit & informed. No one can read pages and pages of T&Cs, and a short "Please provide access to xx data" is insufficient. Whilst a simple statement is insufficient and most people won't read all the T&Cs this does NOT mean that these are the only choices for consent notification.

Digi.me has adopted a layered consent model, with 6 key upfront questions, that we argue, and others have reviewed & agreed, DOES provide explicit & informed consent in a single screen, with backup more detailed layers fo information, ultimately leading to the full legal T&Cs.

More details can be provided upon request.