

Data Sharing Review

Background

Q1

Please explain what your interest in information sharing is. If you have an active involvement in personal information sharing, we would be grateful for the following information:

- What kinds of personal information do you collect, hold and share?
- How do you collect, hold and share such personal information?
- For what purposes do you collect, hold and share such personal information?

Phorm is a technology company specialising in delivering behaviourally and contextually targeted advertising while preserving users' personal privacy and security.

We have developed a patent-pending software platform that can predict the content in which a person is likely to be interested at any given point in time. Phorm's platform is revolutionary as it works without storing or retaining any personally identifiable information, and thus establishes a new standard for Internet user privacy.

Phorm's partners include leading ISPs, Publishers, Ad Networks and Advertisers. Each of our partners understands how crucial personal privacy is to consumers, and adheres to the highest standards of user privacy.

Specifically, what makes us unique is that our technology does not collect, hold or share any information on individual users and even we ourselves would be unable to find out who is using the software, as it holds no record, even within 'itself'.

As a company, of course, Phorm UK, Inc, does hold personal information for HR, financial and other commercial purposes. Phorm has a data protection register entry that describes these classes of data and the purposes for which they are stored.

Technology

Q20

What impact in your view have technological advances had on the sharing and protection of personal information? Please provide examples.

We at Phorm believe that the software that we have developed through the Open Internet Exchange (OIX) and Webwise is a major technological advance in that our technology does not require the storage, let alone the sharing, of personal data, yet delivers a more relevant and personalised experience for users.

In this way, Phorm's technology dispels the myth that in order to provide relevance you have to store users' personal data – PII and browsing histories.

This is in stark contrast to many other online businesses which rely on ever increasing amounts of data being shared or data being vulnerable from effective protection.

Q22

How, in your view, could 'privacy enhancing techniques', such as the anonymisation or pseudonymisation of personal information, help safeguard personal privacy, whilst facilitating activities such as performing medical research?

Is sufficient advice about the deployment of such techniques available? Are you confident about using them? What are the barriers to using them?

Phorm believes that there has existed technological barriers to effective on-line anonymisation and pseudonymisation of personal information, until the OIX and Webwise was developed.

The anonymisation that the OIX and Webwise provide is central to the relevant online advertising proposition. Phorm and its ISP partners have conducted extensive customer research and know that online users are concerned about their personal data being used and stored. OIX and Webwise was built from the ground up with consumer privacy protection in mind. The technology cannot and does not tie in to an ISP's authentication system or any other information the ISP holds about the consumer. Phorm's privacy enhancing technology means that a user's browsing history cannot be reverse-engineered to reveal their identity or any other personal information.

OIX is a breakthrough for advertisers and publishers as it harnesses anonymised ISP data to help advertisers reach their most valuable customer segments with unprecedented precision. Indeed, it sets a new 'gold standard' on privacy and anonymity as it does not gather personally identifiable information, does not store IP addresses or retain browsing histories: OIX cannot know who you are or where you've browsed.

Webwise – the consumer facing part of the technology – also means new, higher levels of protection from online fraud and a reduction in the level of irrelevant advertising. The OIX software dispels the argument that data on user browsing behaviour must be retained and stored in order to provide more relevant advertising. And, crucially, users can choose if they want the system switched off or on.

Phorm's systems and privacy practices have been audited by Ernst & Young against internationally accepted privacy best practice. Privacy advocates Privacy International / 80/20 Thinking are conducting a Privacy Impact Assessment study and have concluded:

*The Ernst & Young report is available at:
http://www.phorm.com/user_privacy/privacy_audit.php*

*Simon Davies, Director, Privacy International, MD, 80/20 Thinking said:
"In our view, Phorm has implemented privacy as a key design component in the development of its system. In particular, Phorm has quite consciously avoided the processing of personally identifiable information."*

Phorm believes its level of external validation of privacy practices should be encouraged – or perhaps required – for online businesses handling personal information.

Additional questions

Q28

Please set out any additional suggestions or observations you have that you believe will be of assistance to the review.

Phorm believes it has established a new benchmark for personal privacy online.

It has always been part of Phorm's philosophy, and is in our company's DNA, that a users' on-line experience should be privacy protected and that they have every right to expect this.

Phorm believes that all online users should be able to expect similar standards of privacy and transparency from all online businesses.

Phorm would welcome participation in any forums to discuss how to implement these privacy practices across the industry.

Ends