



FREEDELITY

Consent collection and retail:

a key issue for retail media
projects and first-party
data monetization.



CUSTOCENTRIX
YOUR RETAIL ACCELERATOR

Table of Contents

1	Introduction and context	3
2.	When is specific consent recommended?	4
3.	CRM and regulatory compliance: a shared challenge?	6
4.	Solutions proposed by Freedelity for consent collection and management	7
	Freedelity in a few words	11



1. Introduction and context

When it comes to the collection, processing, and monetization of personal data, we are entering a pivotal period: the announced disappearance of third-party cookies, evolving regulations regarding the use of digital channels, advertisers' expectations for measuring returns on investment in advertising, particularly digital, the rise of retail media offerings, the emergence of data collaboration solutions (data clean rooms), and the impact of so-called artificial intelligence solutions.

All these developments converge toward several key observations:

- The usefulness and value of so-called first-party data
- The importance of collecting appropriate consent
- The need for transparency and accountability in relationships with both advertisers and consumers
- The relevance of developing sovereign solutions (from a European perspective) dedicated to processing European consumers' personal data

2. When is specific consent recommended?

Let's be realistic: most personal data processing for direct marketing and personalized digital marketing relies on advanced statistical algorithms (scoring, profiling, segmentation, etc.) and detailed behavioral or purchase data. Furthermore, retail media projects, digital audience activation, and co-marketing initiatives with suppliers often require data sharing or transfer between data controllers. This remains true even when these collaborations occur via data clean rooms and encryption/pseudonymization methods.

According to regulations and the interpretations of competent local authorities, profiling processes are frequently considered «intrusive». Within the framework of the balance of interests concept—where the interests of data controllers and consumers must be weighed—this classification necessitates the collection of specific consent.

In this context, our teams have developed tailored solutions for consent collection and management, offering customizable options. These solutions meet the practical needs of our clients' Data Protection Officers while demonstrating sincere respect for consumers and the necessity of properly protecting their personal data.



Could we not be satisfied with a personal preference management solution?

This is the question that business teams ask us almost systematically, particularly in companies that use marketing automation solutions on the market, which generally include this type of functionality.

For the record, preference management is the ability for a consumer to disable a feature previously enabled by default (i.e. without an unchecked box) when initiating processing based on legitimate interest. When it comes to this subject, it is often referred to as the concept of soft opt-out (right to object). Furthermore, preference centres are also useful for minimising opt-outs (unsubscriptions), managing subscriptions and adjusting the parameters relating to the marketing pressure tolerated by a consumer (maximum frequency of reception per period).

During work and discussions with the DPOs and specialised lawyers, the question of whether to be satisfied with a preference centre was of course addressed to them.

The response from the lawyers concerned was unanimously negative: neither the soft opt-out nor the use of a preference centre met the requirements.

This proposition was therefore immediately ruled out in favour of the following method.

Following the example of the interfaces used for accepting cookies, the UX specialists proposed a logic that would allow each consumer to:

- accept all consents with one click;
- refuse these same consents with one click;
- access a detailed interface allowing them to be accepted step by step, treatment by treatment.

It is therefore this approach, described by the Freedelivery teams as 'granular consents', which is presented to you in more detail in the following chapters.

The image shows a mobile app interface for Faruja. At the top, there's a header with the Faruja logo and a 'Welcome' message with a settings icon. The main content area has a teal background with white text. It says: 'By consenting to the Faruja privacy policy, you agree to the following processing operations:'. Below this, under the heading 'Consents:', there are two consent items, each with a checkmark icon and a question mark icon: 'I consent to the analysis of my personal preferences, behavior and interests for profiling purposes in order to receive tailored communications.' and 'I consent to the transfer of my consumption data, purchases, product preferences and other interactions'. At the bottom, there are three buttons: 'Refuse everything' (with a close icon), 'Set up' (with a gear icon), and 'Accept all' (with a checkmark icon). The bottom of the screen shows a 'powered by FREEDELITY' logo.

The image shows a mobile app interface for Faruja, specifically the 'Consent parameters' screen. It has a dark teal background. At the top, there's a header with the Faruja logo and a 'Welcome' message with a settings icon. Below the header, there's a 'Back' button. The main title is 'Consent parameters'. Under the heading 'Consents:', there are two consent items, each with an unchecked checkbox and a question mark icon: 'I consent to the analysis of my personal preferences, behavior and interests for profiling purposes in order to receive tailored communications.' and 'I consent to the transfer of my consumption data, purchases, product preferences and other interactions with Faruja (email tracers, response to surveys, visits to kiosks, reading a digital folder etc. for example), for the purposes of audience creation.' At the bottom, there are two buttons: 'Validate all' (grey) and 'Confirm' (green). The bottom of the screen shows a 'powered by FREEDELITY' logo.



3. CRM and compliance with regulations, the same fight?

Before going into the choices and implementation details, let's take the time to raise the debate by focusing on the objectives underlying the collection and processing of personal data by retailers.

The objectives in question are part of what is generally referred to as 'Customer Relationship Management' (CRM). Identifying and getting to know their customers in order to offer them a personalised (tailored) service, maintaining a relationship of trust over the long term, getting to know them better in order to develop commitment and loyalty, sending them relevant communications and rewarding them for their loyalty, preventing attrition, developing the 'share of wallet'.

Let's face it, this spirit and these objectives are perfectly congruent with the spirit of the regulation, which provides for prior information that is easy for everyone to understand, a free and unambiguous choice, without constraints...

This is what motivates and inspires the research and development work carried out by our teams, who are keen to eliminate as much friction as possible by means of a unique identification of each individual, which above all makes it easier to identify oneself during regular interactions.

4. Freedelity's consent collection and management solutions

For retail players whose physical points of sale are the main sales channel, data collection and consumer identification at the point of sale is a key factor for success. This is true for:

- contributing to differentiation from their direct competitors;
- offering omnichannel services and solutions to their customers;
- having the same level of customer knowledge as the web 'pure players'.

Thanks to their e-commerce sites, and provided they are well organised, the latter do in fact have a very exhaustive view of the relationship with their customers:

- systematic collection of their personal data and e-mail addresses (account creation);
- identification of visits using cookies and other first-party trackers (with consent)
- attribution of the origin of visits and sales to marketing actions (if cookies are active and consented to);
- complete view of the purchase history and digital interactions with each customer.

It is particularly in order to claim an equivalent level of customer knowledge that our customers invest in our personal data collection and management solutions at each of their points of sale. Below, we present an overview of each of the components of the solutions designed by our teams for them.

'THE ADVANTAGES OF CUSTOCENTRIX IN TERMS OF PERSONAL DATA MANAGEMENT'

- **Omnichannel approach: consolidated repository of consumers across all channels, thanks to a unique identification of each individual.**
- **Fast and frictionless identification at the checkout.**
- **Effortless data maintenance thanks to the clever concept of mutualisation of updates between CustoCentrix users.**
- **Solutions for collecting consent at the point of sale and access to personal data by consumers (kiosks, digital screens, portals).**
- **Traceability of consent.**



Touchscreens, kiosks and electronic forms to simplify and accelerate data collection and ensure the traceability of consent

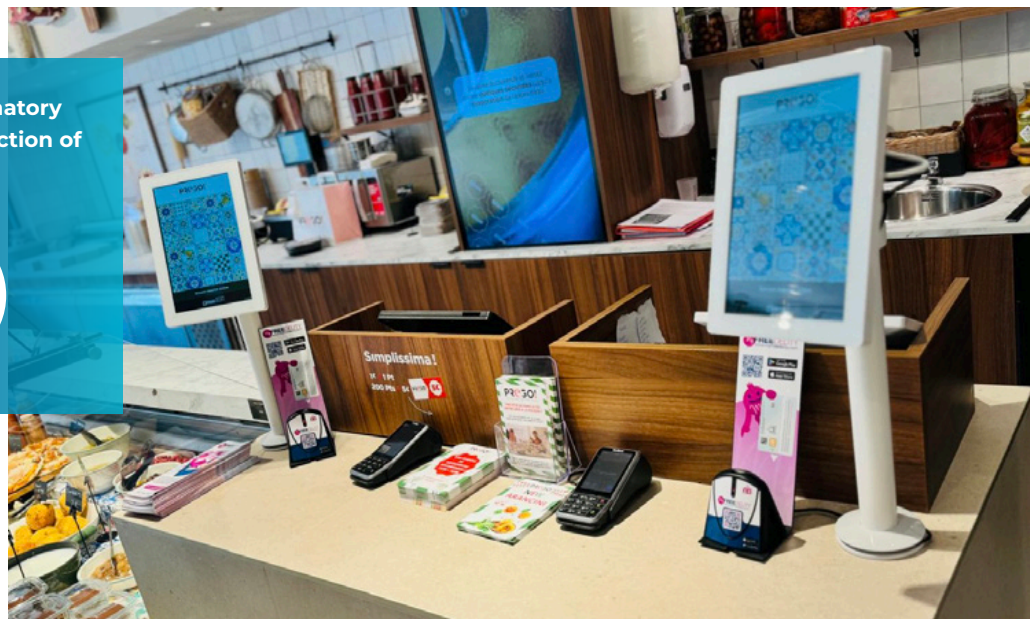
In many shops, a smooth checkout process is a key issue in terms of the customer experience. The subject is the focus of numerous experiments aimed at finding the best combinations to meet the expectations of different customer segments. Those who like to chat and seek interaction, those who are looking for advice, those in a hurry, self-service regulars, techies whose mobile is their best friend, not to mention those who appreciate attentive service...

Data collection processes must therefore adapt and offer multiple alternatives without losing sight of compliance with the rules on the processing of personal data. This is exactly what CustoCentrix offers through a range of solutions, examples of which are shown below:

- touchscreens connected to the cash register systems;
- mobile tablets dedicated to mobile use within the point of sale;
- kiosks;
- digital forms linked to QR codes;
- a mobile application;
- a web portal and dedicated landing pages.



Watch our explanatory videos on the collection of consents.



The characteristic of these interfaces? They all converge towards a centralised repository organised to manage a unique identification of each individual and ensure the quality of the data over time. This repository also ensures the complete traceability of the consents collected: their collection methods, the granularity of the consents, transparency in response to questions and access requests from consumers.

A quick method of identifying consumers each time they go through the checkout



In this case, the use of the electronic identity card (eID) is proving to be a formidable solution for simplifying and speeding up all processes of identification, data collection and maintenance.



Complete and reliable personal data collected or validated in 1.5 seconds.

Effortlessly keeping data up to date as a complement to profile and contact data quality management tools

Collecting data and consents for the first time is a challenge in itself. We have explained how to simplify and speed up these processes. However, the most costly and complex thing to organise is to ensure that this data is kept up to date over time, while ensuring in particular that:

- the database does not contain any duplicates;
- the email and postal addresses are correct;
- people belonging to the same family unit can be grouped together.



This is one of the great strengths of CustoCentrix, combined with the clever mechanism of sharing the updating for data between the platform's stakeholders/users.

This is in fact one of the major advantages of using the electronic identity card:

- The data accessible through it is sufficiently rich to allow the creation of a unique identifier that is permanent over time and independent of national numbers whose use is regulated.
- Each reading of the card makes it possible to:
 - ▶ Validate the data and detect possible updates;
 - ▶ Request the sharing of an e-mail address or the correction of errors preventing its uses;
 - ▶ Check whether or not it is useful to complete the consents.



Secure interfaces for accessing and consulting personal data

Data collection means regulatory obligations for the data controller. These obligations include the right to consult, update and delete data, but also the burden of proof of adherence to the general conditions and consent procedures.

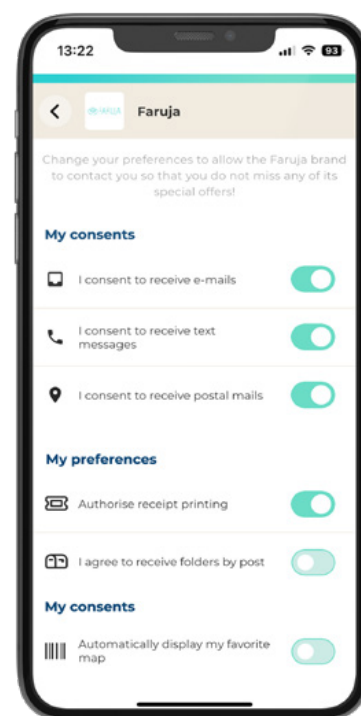
This is the very reason behind the many solutions developed in addition to CustoCentrix:

- the myFreedelity portal and application;
- the use of the identity card as a means of identification on kiosks and screens with the function of access to personal data processed and its updating;
- the 'Portal' module, which allows each brand to deploy a consumer portal dedicated to omnichannel customer relations.



These highly secure interfaces allow each consumer to access their personal data, manage their consent and communication preferences, assert their right to be forgotten and consult all interactions related to the use of the electronic identity card (eID).

This is a pragmatic way for businesses using CustoCentrix to free themselves from a huge number of constraints related to compliance with the General Data Protection Regulation (GDPR). Especially since the platform memorises the versioning of the personal data protection policies and general terms and conditions as accepted by each consumer.



Freedelity in a few words

Freedelity develops the CustoCentrix and MyFreedelity IT platforms, as well as a solution specifically dedicated to managing the quality and uniqueness of personal data processed for B2C CRM purposes.

Freedelity defines itself as the 'trusted third party' in the relationship between BtoC data controllers and consumers who are part of the Freedelity database. This is particularly true for retailers who subscribe to and collaborate with the concept of shared maintenance of identification data.

Frictionless data collection and effortless data maintenance

Since its creation in 2010, Freedelity has been offering its customers the simplification of personal data collection, most notably by using the information contained in the chip of electronic identity cards. In just 1.5 seconds, clients obtain accurate and complete data. This collection of reliable data also feeds into a clever concept of mutualized maintenance of personal and contact data, ensuring not only the uniqueness of each known consumer profile in the database but also the automated updating of that data.



**Discover our
CustoCentrix data
collection solutions**

Freedelity SA/NV
Rue Altiero Spinelli 7 - 1401 Nivelles, Belgique

+32(0)2/880.98.36 — retail@custocentrix.com
www.freedelity.be
www.custocentrix.com

Freedelity and the Freedelity logo are registered trademarks of Freedelity SA.
All rights reserved. BCE No. BE0818.399.886.

Non-contractual and confidential document.