EASA Digital Marketing Communications
Best Practice Recommendation

EASA

EASA - the European Advertising Standards Alliance is the single authoritative voice on advertising self-regulation. EASA promotes high ethical standards in commercial communications by means of effective self-regulation, for the benefit of consumers and business in Europe and beyond.

Effective advertising self-regulation helps ensure responsible advertising, meeting consumers’ demand for honesty and transparency, regulators’ demand for responsibility and engagement and businesses' demand for freedom to operate responsibly. EASA and its members have developed a robust and coherent system of advertising self-regulation that can respond effectively to new challenges.

EASA is not a Self-Regulatory Organisation (SRO) in itself, but acts as a co-ordination point for best practice in the implementation of self-regulation, as well as operational standards for its national SRO members. Part of EASA’s role involves coordinating the cross-border complaint mechanism, EASA also collects and analyses top line statistical data on received and resolved complaints, as well as on copy advice requests and pre-clearance from its SRO members each year.

EASA was set up in 1992 to represent national self-regulatory organisations in Europe; in 2004 EASA developed into a partnership between national advertising SROs and organisations representing the advertising industry. Today, EASA is a network of 54 organisations committed to making sure advertising is legal, decent, honest and truthful. EASA’s membership is made up of 38 SROs from Europe and beyond, and 16 advertising industry associations, including advertisers, agencies and the media. EASA is a not-for-profit organisation with a Brussels-based Secretariat.

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Executive Summary

EASA established its first Digital Marketing Communications Best Practice Recommendation (DMC BPR) in 2008 to provide guidance to SROs in EASA membership when enlarging their remit to cover digital marketing communications. The DMC BPR builds on the principles outlined by the International Chamber of Commerce’s (ICC) Consolidated Code on Advertising and Marketing Communication Practice (www.iccwbo.org) to ensure the application of self-regulation in the digital space.

Given the quick paced evolution of new digital and interactive marketing techniques developed in the recent years EASA identified the need to revise the Recommendation and ensure the effectiveness of advertising self-regulation. This document is the result of extensive discussions involving media, agencies, advertisers, Self-Regulatory Organisations (SROs) and key external stakeholders.

The updated EASA Digital Marketing Communications Best Practice Recommendation:

- Reconfirms the advertising Industry’s commitment to apply effective advertising self-regulation (SR) to all media, including digital marketing communications;
- Recognises the global nature of digital media and the need to develop a coordinated response across EASA’s membership;
- Provides clear guidance to EASA’s SRO members on how to determine whether content under review is a marketing communication in the digital space;
- Encourages local SROs and advertising industry representatives to ensure that the self-regulatory remit at national level is aligned with the recommendations set out in this document;
- Identifies a non-exhaustive list of digital marketing communications practices which are recommended to be in SRO’s remit;
- Identifies forms of digital content which lie outside of SRO’s remit under all circumstances.
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1 SECTION - INTRODUCTION

1.1 What is an EASA Best Practice Recommendation?

EASA’s Best Practice Recommendations (BPRs) are designed to provide support and advice to EASA’s Self-Regulatory Organisations (SROs) and industry members on the practice of advertising self-regulation. They are based on EASA’s Common Principles and Operating Standards of Best Practice and Best Practice Self-Regulatory Model\(^1\).

EASA BPRs can be divided into two main categories: operational and blueprint BPRs. Operational BPRs give guidance on the operation, structure and procedures of SROs while blueprint BPRs provide guidance on the remit and codes of SROs. The content of blueprint BPRs, such as the present publication on Digital Marketing Communications, needs to be agreed upon by the whole advertising eco-system and all SROs at European level.

EASA BPRs provide guidance and aim to achieve a consistency of remit and application throughout Europe for the benefit of European consumers and businesses, whilst recognising that the way to achieve this at national level may differ as a result of the national regulatory, cultural and societal context.

Best Practice Recommendations do not constitute a European code and are not formally binding. The implementation of a BPR at national level is the result of a negotiation process which takes into account the existing (self) regulatory framework and the legal background to find an approach best suited to the national circumstances and needs. A national SRO may choose to adopt provisions in its advertising code which go beyond those recommended by EASA; some indeed, have already done so.

BPRs are designed to stimulate and assist national discussions on the development of effective self-regulation and are intended as a means for taking clear actions at both European and national level.

1.2 The challenge of regulating Digital Marketing Communications

It is increasingly evident that the rapid and ongoing evolution of digital marketing communications means that developments often outpace legislation. Moreover, today’s consumers have grown used to high standards, arising from the activities of SROs in the traditional media, which they expect to see maintained, irrespective of the method of communication.

\(^1\) For more information please visit EASA website www.easa-alliance.org.
These factors - the evolution of marketing communications in the digital sector and the demands of consumer protection, together with the need to maintain confidence in existing self-regulatory systems - have led to unanimous agreement by the advertising industry on the need for a level playing field across all media. This agreement is in line with the International Chamber of Commerce’s decision that its Code should apply without exception to all forms of marketing communication.

1.3 Remit and responsibility

1.3.1 Establishing remit for Digital Marketing Communications

Digital marketing communications are subject to all the existing rules of the SRO’s advertising code, as is the case with marketing communications in traditional media. The generally accepted definition of what constitutes a marketing communication is provided by the 2011 ICC Consolidated Code on Advertising and Marketing Communication Practice (see Section 2 at page 7).

This definition, as agreed by the advertising industry, unambiguously extends the remit of advertising self-regulation to all forms of marketing communications, including for digital media, as well as any future forms of digital marketing communication that are yet to be developed.

The rapid growth of DMC and their widely-differing importance, in terms of market share in various countries, have resulted in a degree of variation between national self-regulatory approaches to regulating this sector. A ‘one size fits all’ approach is neither appropriate nor proportionate, as developments are likely to occur at different speeds in different countries. Nevertheless, EASA’s members recognise the importance of working together to ensure high standards for DMC, as evidenced by, for example, the existing EASA Cross-Border Complaints system.

1.3.2 Responsibility

The 2011 ICC Code states that “Marketers have overall responsibility for the marketing communications of their products (2011 ICC Code, General provisions, page 14)” and, therefore, places primary responsibility on the marketers. However, it also specifies that everyone involved shares a responsibility proportionate to their respective position: “(...) whatever the nature of the activity, responsibility is shared by all the parties concerned, commensurate with their respective role in the process and within the limits of their respective functions (2011 ICC Code, Chapter D: Responsibility, page 35)”. In most cases, a co-operative approach between media, advertisers, agencies and SROs will be appropriate in the same way it would be in the offline world.
1.4 Implementation

1.4.1 How should SROs use the BPR?

SROs will find the BPR useful in the following areas:

- As a basis for discussions with industry representatives on advertising standards and the application of self-regulation to DMC and, where appropriate, non-binding consultation with external stakeholders;
- As an aid in identifying any structural and/or procedural changes (juries, enforcement, sanctions and monitoring etc) which may be needed to extend an SRO’s remit;
- As a basis for discussions between SROs and key DMC operators and associations which are not already in membership of the SRO, with a view to them recognising the SRO's code and its role;
- As a means of identification and assessment of an SRO’s needs in terms of resources (i.e. technical and logistical support, additional personnel, staff training and creating awareness).

1.4.2 How should EASA Industry members use the BPR?

To ensure the necessary discussion and adjustment at national level it is recommended that EASA’s industry members:

- Encourage their corporate and national association members to support the BPR’s aims and objectives;
- Support the extension of self-regulation and the changes in the local codes as described in the BPR;
- Provide practical and, where needed, financial support for any necessary restructuring and/or procedural changes within the national SRO;
- Support the appropriate involvement of new digital players in the process of code revision and enforcement.
2 SECTION - DIGITAL MARKETING COMMUNICATIONS BPR

2.1 Introduction

This BPR is intended to provide detailed guidance to EASA SRO and Industry members on the operation and practice of advertising self-regulation. It is designed to stimulate and assist national discussions on the development, where necessary, of self-regulation according to the *Best Practice Self-Regulatory Model*.

The BPR is based on *EASA’s Common Principles and Operating Standards of Best Practice* (hereafter referred to as Common Principles) and the *Best Practice Self-Regulatory Model*. The advertising industry committed itself to achieve these through the signing of *EASA’s Advertising Self-Regulation Charter*.

The Charter sets out EASA’s commitment to the practical and effective operation of self-regulatory bodies and contains ten principles. The following principles are the most relevant to Digital Marketing Communications:

*Art.1 Comprehensive coverage by self-regulatory systems of all forms of advertising and all practitioners,*

*Art.3 Comprehensive and effective codes of advertising practice:*
  - *based on the globally accepted codes of marketing and advertising practice of the International Chamber of Commerce (ICC)*
  - *applicable to all forms of advertising*

Based on the principles outlined by the *EASA’s Common Principles* and the *Best Practice Self-Regulatory Model* this BPR offers a goal for self-regulatory systems throughout the Single Market while recognising that the means of achieving it may differ. It is a practical example of ‘unity through diversity’.

This BPR proposes a set of commonly agreed upon principles which can form the basis of national discussion across EASA’s network where necessary. EASA recognises that, subject to local parameters and membership agreement, SROs may choose to go beyond what is suggested in this document.

SROs may, where appropriate, advice marketers about complaints that are outside remit so that the marketers will be made aware of the complainant’s concerns.
2.2 Recommendation

2.2.1 Coverage in general

EASA has reviewed various techniques and applications of marketing communications in the digital media. These ranged from viral marketing advertising in marketer- and third-party owned websites, digital outdoor, marketing communications within or leveraging social media and in-console stores, in-game ads (whether in online or offline games), all using digital-based technologies. However, due to the constantly evolving nature of these marketing communications, no analysis can be more than a ‘freeze-frame’ of the situation at the moment when it was written, and ongoing review will be required.

As such, this BPR will help SROs differentiate between marketing communications (see definition below) and editorial content\(^2\).

Marketing communications defined by the 2011 ICC Code should fall within the wider remit of advertising self-regulation unless restricted by national provisions:

> “the term “marketing communications” includes advertising as well as other techniques, such as promotions, sponsorships and direct marketing, and should be interpreted broadly to mean any communications produced directly by or on behalf of marketers intended primarily to promote products or to influence consumer behaviour;”

The ICC code also clarifies that marketing communications:

> “[...] do not extend indiscriminately to every type of corporate communication. For instance, the Code does not apply to corporate public affairs messages in press releases and other media statements, or to information in annual reports and the like, or information required to be included on product labels. Likewise, statements on matters of public policy fall outside the scope of this code. Corporate social responsibility (CSR) programmes as such are not covered by the Code; however, when a CSR statement appears as a claim in a commercial communication, the Code is applicable. The Code also applies to marketing communication elements of a CSR programme, for example where a sponsorship is included in such a programme. Finally, communications whose primary purpose is entertaining or educational and not commercial, like the content of television programmes, films, books magazines or video games, are not intended to be covered by this code. (2011 ICC Code, Introduction, The Code, page 1)”

\(^2\) Section 2.2.4 lists content that is not a marketing communication and, by definition, falls outside the remit of self-regulation.
“[…] should be clearly distinguishable as such, whatever their form and whatever the medium used. When an advertisement appears in a medium containing news or editorial matter, it should be so presented that it is readily recognisable as an advertisement and the identity of the advertiser should be apparent (see also article 10). Marketing communications should not misrepresent their true commercial purpose. Hence a communication promoting the sale of a product should not be disguised as for example market research, consumer surveys, user-generated content, private blogs or independent reviews. (2011 ICC Code, General provisions on advertising and marketing communication practice, page 6)”.

2.2.2 Definitions

• the term “marketing communications” includes advertising as well as other techniques, such as promotions, sponsorships and direct marketing, and should be interpreted broadly to mean any communications produced directly by or on behalf of marketers intended primarily to promote products or to influence consumer behaviour;

• the term “advertising” or “advertisement” means any form of marketing communications carried by the media, usually in return for payment or other valuable consideration;

• “Editorial content” includes any content that informs, educates or entertains, provided its primary purpose is not to advertise;

• the term “product” refers to anything that constitutes the subject of an advertisement; this usually means a goods or services, but is not restrictive: where appropriate, it may also be applied more widely, e.g. to concepts;

• the term “marketer” refers to persons or companies, including advertisers, sales promoters and direct marketers, who or on whose behalf marketing communications are published or disseminated for the purpose of promoting their products or influencing consumer behaviour;

• “Marketer-owned digital property” is an asset used as marketing communications owned or controlled, in whole or in significant part, by a marketer;

• “Social media” can be defined as online services or virtual places that allow people to communicate with each other within a virtual community, including through sharing information and content, such as text, images, videos and sound files;

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3 This may include websites, apps, advergames, etc.
• “Corporate reports” include corporate public affairs messages in press releases and other media statements, annual reports, statements on matters of public policy and the like.

2.2.3 Within Self-Regulation Remit

All the digital techniques listed below fall under the definition of “marketing communications” in paragraph 2.2.2 and within the remit of SROs if used for the purpose to advertise.

Current examples of digital advertising techniques in remit are:

• Advergames
• Ads on DVD/CDrom
• In-app advertising
• Digital outdoor
• Display ads (moving, non-moving)
• Marketer-generated or endorsed advertising content
• MMS/SMS advertisements or mobile advertising
• In-game advertising (whether offline or online)
• Online ‘public’ classified (i.e. classified ads placed by companies not private individuals)
• Paid inclusion/Paid search
• Interactive TV services advertising
• Social media advertising
• Text ads
• Marketer owned apps

This list is non-exhaustive. Full definitions of the concepts above are available in the Annex.

2.2.4 Outside Self-Regulation Remit

The following content is not a marketing communication and, by definition, is outside the remit of self-regulation:

• Any form of editorial content (including blogs and readers’ comments)
• Corporate reports
• Independent review websites (i.e. the review content itself);
• User Generated Content (UGC) that is not initiated or subsequently endorsed by a marketer
• Content that constitutes the product itself (e.g. a virtual product).
2.2.5 Marketer-owned digital properties

As established in the previous sections, all marketing communications, as defined by the ICC Code, fall within the remit of SR systems. It is not, however, always immediately apparent to what extent content on marketer-owned digital properties may constitute marketing communications and thus fall within the remit of the SROs.

It should never be automatically assumed that a marketer-owned digital property is a marketing communication in its entirety. The actual content of the marketer-owned digital property must be reviewed to determine that which is marketing communication content and that which is not.

For this purpose the following criteria establish whether or not the content, or part of the content of a marketer-owned digital property constitutes a marketing communication:

- Claims (implied, direct, written, spoken and visual) about products or marketers, where the claim is not made in the context of editorial content, annual reports, CSR reports, or similar;
- Where they pertain to the marketing communications and commercial practices covered by the Unfair Commercial Practices Directive (for example, price promotions and invitations to purchase);
- Third-party UGC and/or viral marketing that has been distributed or endorsed by the marketer;
- Marketing communications that have previously appeared, in the same or comparable form, on other media platforms, including online media platforms.

2.2.6 Social media

A clear distinction between marketing communications and editorial content on social media is essential. Marketing communications on social media may take the form of marketer-owned digital properties (e.g. a social media page for the product or service being promoted), display or banner ads appearing alongside user-generated content on the social media in question, other sponsored advertising similarly placed, or UGC to which the marketer elects to associate his brand, product or service. The consumer must be able to clearly understand that a message is a marketing communication and, in no case, must an advertisement falsely claim or create the impression that a marketer is a consumer and thus create confusion. Marketers using emerging types of social media should remember that these principles will still apply.
The identification of a marketing communication can be achieved through several means, e.g. design, arrangement, content, position/placing within a site or through an identifier. The appropriate way of identifying marketing communications will depend on the context.

2.2.7 User-Generated Content

Although UGC can be used as a form of marketing communications, it is more difficult to assess due to possible ambiguity over its origins. UGC is usually outside the remit of regulation and can be considered as “free speech” of an individual. It may be necessary to distinguish between UGC as it was initially created, on the one hand, and UGC that is subsequently endorsed by a marketer or to which the marketer in some other way seeks to associate his brand or product, on the other, with the latter falling into the remit of regulation but the former falling outside.

In establishing whether UGC should be regarded as DMC, and consequently fall within the SRO’s remit, the primary question is:

- Has the marketer solicited, endorsed, incorporated, distributed or actively promoted the UGC?

If so, the material constitutes a marketing communication in the sense of the agreed definition, and the SRO is entitled to review the UGC in question. If the SRO concludes that the UGC breaches its code, the marketer should take all reasonable steps to amend or remove its active engagement to the UGC. If not, the UGC is considered not to be a DMC and therefore falls outside the SRO’s remit.

UGC on social media is usually identified as content created by Internet users through reviews, blogging, podcasting or posting comments, pictures or video clips. UGC which is intentionally solicited, endorsed, incorporated, distributed or actively promoted by a marketer for advertising purposes would become a marketing communication for which they would be responsible for. Examples of a marketer adopting and endorsing content could include: “liking”, “retweeting”, “sharing” or using in other media.

If marketers or brand owners approach users to generate content in exchange for payment or other reciprocal arrangements, and have control of the content, then this would need to be clearly identified as marketing communication⁴.

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⁴This should not prejudice the existing legal protections.
2.2.8 Data protection and privacy

As is the case in other areas, while looking at data protection and privacy the ICC code provides a useful starting point for consideration:

“when collecting personal data from individuals, care should be taken to respect and protect their privacy by complying with the relevant rules and regulations (2011 ICC Code, article 19, page 11)”.

Like all the other aspects of the ICC code, this also applies to digital marketing communications. In accordance with the ICC provisions, EASA actively encourages its Industry members to comply with existing legislation and relevant industry-negotiated agreements in their digital marketing communications.

EASA and its Industry members have developed a BPR on Online Behavioural Advertising (OBA) building on the IAB Europe OBA Framework which was published in April 2011. The EDAA (European Interactive Digital Advertising Alliance\(^5\)) has since been established to administer key aspects of the OBA Self-Regulatory Programme and provides companies with the means to ensure that consumers have transparency, choice and control over their online advertising preferences. This approach is supported by a broad industry coalition at European-level, and by all European SROs, which are responsible for enforcement of the OBA principles and consumer complaint handling\(^6\).

\(^5\) For more information please visit EDAA website [http://www.edaa.eu/](http://www.edaa.eu/)

\(^6\) The OBA framework includes conditions of compliance.
3 SECTION – SRO IMPLICATIONS

3.1 Resources and membership

The extension of an SRO’s remit may increase the number of complaints and copy advice requests and potentially requires additional resources (hardware, software, personnel).

To ensure the necessary resources, as well as for practical reasons of effectiveness, it is essential to ensure that the SROs’ funding and membership systems are comprehensive and robust, strengthening them where necessary.

From an operational point of view, it is desirable for SROs to include relevant digital media practitioners (e.g. practitioners in membership of the IAB) within their systems. Policies are implemented most effectively when all the parties involved are in general agreement about the steps to be taken and committed to providing the necessary support and resources.

See EASA’s Best Practice Recommendation on Funding.

3.2 Consumer/user awareness

To encourage consumers/users to help identify potential problems at an early stage, it is essential that SROs are easy to find and contact online. This could be achieved by effective promotional activities, including the active use of keywords in online search engines. EASA’s BPR on Communications and Awareness emphasises that SROs should make sure that they have an easy-to locate presence online, including a dedicated website (or section of a website), and that the SRO’s online complaints form is linked to from other related websites. The SRO’s web address should be widely publicised, e.g. on all the SRO’s communication material.

Finally, EASA encourages SROs, when appropriate, to co-operate with non-member organisations which have conducted consumer research on topics of interest. This type of initiative may range from informal information exchanges to sector-wide monitoring exercises.

See EASA’s Best Practice Recommendation on Communications and Awareness.
3.3 Jury composition and training

In order to maintain the authority and credibility of an SRO jury, it is important to ensure that the composition of the jury takes into account the need for impartiality, relevant expertise and sustainable independence. For these reasons, particular attention should be paid to selecting the members of the SROs juries.

In addition relevant training in relation to new provisions (in this case digital marketing techniques) is essential to ensure that the jury of an SRO possess the requisite abilities, experience and competence to carry out its functions since the credibility will depend on it performances as well as on its composition and procedures.

See EASA’s Best Practice Recommendation on Jury Composition.

3.4 Sanctions

SROs have a variety of sanctions at their disposal. These include instructing the media to refuse advertisements, creating adverse publicity through the publication of decisions (naming & shaming) and expulsion from trade associations.

With regards to DMC, the responsibility of the marketer is paramount and marketers are expected to respect the decision of an SRO even if they do not agree with it. SROs may also encourage the use of compliance clauses in advertising contracts, which enable a media owner to refuse a marketing communication which has been found by an SRO to be in breach of a code.

As with traditional media, on the rare occasion where all else fails, the SRO may have to refer the case to the statutory authorities, who have the power to prosecute the marketer with regard to unfair commercial practices and misleadingness. This sanction of last resort is usually necessary only in the case of “rogue traders” who have no intention of complying voluntarily with any form of regulation. Although the decisions reached by an SRO do not have legal force, in the event of a subsequent court case the opinion of an SRO is likely to be taken into account by the court.

3.5 Monitoring of compliance

The notion of effectiveness is central to EASA’s Common Principles. Public perception of a self-regulatory system will depend to a large extent on how efficiently it is seen to deal with complaints. Monitoring DMC will allow a SRO to take action on its own initiative and be seen to play a proactive role in ensuring code awareness and compliance. This will be
important in determining whether the rules and their interpretation and application are continuing to be relevant.

See EASA’s Best Practice Recommendation on Advertising Monitoring.

3.6 Copy advice

EASA encourages its members to use the provision of copy advice with regards to DMC. This will not only benefit the marketers, agencies and media immediately concerned, but also the wider advertising industry, by avoiding complaints and promoting an image of social responsibility. This will encourage greater interaction of digital marketing actors with the self-regulatory process and raise their awareness of the rules in place. Consequently, marketers, agencies and (digital) media should be actively encouraged to seek copy advice. For more information please visit the international copy advice/preclearance facility at www.ad-advice.org.

See EASA’s Best Practice Recommendation on Copy Advice.

3.7 EASA monitoring of BPR implementation

SROs are invited at any stage to inform EASA of difficulties encountered with regard to the use of this BPR. This could include for example SR procedures, resources or implementation. This will help to identify any arising issues, and any necessary adjustments to be made to the BPR.
4 ANNEX - Glossary of Terms

This glossary of terms has been developed to provide a user-friendly, yet comprehensive, collection of the most commonly used terms with regards to digital marketing communications. This glossary is not exhaustive and provides a snapshot of the terms in use at the time of writing.

Advergame
An electronic game to promote a product or brand by the brand/product owner.

Advertising
The term advertising or advertisement means any form of marketing communications carried by the media, usually in return for payment or other valuable consideration.

Blog
Generic name for any website featuring regular posts arranged chronologically, typically inviting public comments from readers. Blog postings are generally short and informal and blog software is generally free and very easy for individual users, making it a popular tool for online diaries as well as more professional publications.

Corporate Reports
Corporate reports include corporate public affairs messages in press releases and other media statements, annual reports, statements on matters of public policy and the like.

Digital Marketing Communications
The term “digital marketing communications” refers to marketing communications, using digital interactive media intended primarily to promote products or to influence consumer behaviour.

Digital outdoor
Digital out of home (DOOH) refers to dynamic media distributed across screen-based networks in out of home environments such as roadside billboards, transport systems, shopping malls and supermarkets, airports bus-shelters and retail and leisure venues.

Display Advertising
A form of online advertising where an advertiser’s message is shown on a destination web page, generally set off in a box at the top or bottom or to one side of the content of the page.

Editorial content
Editorial content includes any content that informs, educates or entertains, provided its primary purpose is not to advertise.
In-game advertising (IGA)
Refers to the use of computer and video games as a medium in which to deliver advertising.

Interactive TV Services advertising
The remote control (interactive keypad) the viewer uses has a red button to press for Interactive TV, and related advertising. In many cases while watching an ad, a ‘press of the red button’ will allow the viewer to connect directly to the marketer’s website.

Like
Functionality shared by several social networks, including Facebook and LinkedIn, which allows internet users to recommend content/products/services or demonstrate agreement with commentary. This recommendation is shared with the social network, and also serves to move popular content up in the news feed and search rankings.

Marketer
The term marketer refers to persons or companies, including advertisers, sales promoters and direct marketers, who or on whose behalf marketing communications are published or disseminated for the purpose of promoting their products or influencing consumer behaviour.

Marketer-owned digital property
A “marketer-owned digital property” is an asset used as marketing communications owned or controlled, in whole or in significant part, by a marketer;

Marketing Communications
The term marketing communications includes advertising as well as other techniques, such as promotions, sponsorships and direct marketing, and should be interpreted broadly to mean any communications produced directly by or on behalf of marketers intended primarily to promote products or to influence consumer behaviour.

Mobile Advertising
A form of advertising via mobile phones or other wireless devices (excluding laptops). This type of mobile advertising includes mobile web banner ads, mobile internet sponsorship and interstitials (which appear while a requested mobile web page is loading) as well as mobile paid-for search listings. Mobile internet advertising does not include other forms of mobile marketing such as SMS and MMS.

MMS Advertising
Multimedia Messaging Service (MMS) advertising is a marketing message within a standard MMS message and allows for sending messages that include multimedia objects

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7 This may include websites, apps, advergames, etc.
(images, audio, video, rich text). It is mainly deployed in cellular networks along with other messaging systems like SMS, Mobile Instant Messaging and Mobile Email.

**Paid Search**
Fees marketers pay Internet companies to list and/or link their company site or domain name to a specific search word or phrase.

**Product**
The term product refers to anything that constitutes the subject of an advertisement; this usually means a goods or services, but is not restrictive: where appropriate, it may also be applied more widely, e.g. to concepts.

**SMS Advertising**
Short Messaging Service (SMS) advertising is a marketing message within a standard for a text message.

**Social Media**
Social media can be defined as online services that allow to create profiles and communicate with each other within a community, including through sharing information and content, such as text, images, videos and sound files.

**User Generated Content**
Any sort of content created by a user of an online system or service.

**Viral Marketing**
Any advertising that propagates itself. In a digital media context it can be defined as a marketing technique that seeks to use pre-existing social networks to produce increases in brand awareness.