Children and Digital Marketing

Digital technology has transformed the advertising and marketing industry. This briefing outlines how children’s rights are threatened by digital marketing, the companies who can influence this and UNICEF’s view on what needs to be done.

Key drivers
- Consumers’ transition from broadcast to digital media: In 2018, the global spend on digital advertising increased by 17% to $251 billion. The global spend on non-digital advertising remained static at $301 billion.¹

- The global proliferation of digital devices: It is estimated that by 2020, there will be 24 billion connected devices.²

- The birth of the data economy, dominated by a small number of tech companies: In 2015, it was estimated that the EU data economy alone was worth more than €285 billion.³

- Advancements in analytics, AI and algorithmic decision making: How adverts are targeted, placed and delivered has been transformed by technical advancements that allow decisions about how ads are targeted and delivered to be made in real-time.

Key industry players
- Buyers: Companies who advertise their products and the advertising companies who produce adverts.

- Intermediaries: Data brokers and ad tech companies, who process, buy and sell data and provide the means for advertisers to target and place adverts.

- Sellers: Advertising networks and the platforms that host adverts.

The Relevance for Children
Children’s rights that are affected include:

- Privacy and personal information

- The collection, analysis and profiling of children’s data can undermine children’s rights to


privacy and the protection of their personal information.

- Economic exploitation and children’s development

- Children can be exploited by: opaque marketing techniques; advertising that promotes products that are not appropriate for children, for example, foods that are high in fat, salt or sugar; or adverts that affect children’s development, for example, that encourage gender stereotypes.

- Accountability and redress

- Companies need to be accountable for their actions and children need opportunities for redress if their human rights are violated.

Elements of Digital Marketing to Consider When Addressing Children’s Rights

UNICEF has identified two distinct areas of digital marketing that impact children’s rights:

- Means of advertising

The means of advertising includes:

- Timing: Adverts on sites and services directed at children should be suitable at all times. Care should be taken around the timing of adverts at times children are likely to be online.

- Placement: Ads directed at children should not be placed within sites, apps or games that contain content that isn’t suitable for them. Inappropriate adverts should not appear within sites, apps or games that are directed at children.

- Context: Advertising in branded environments should be properly identified.

- Form: Opaque marketing techniques such as the use of influencers should be identified as advertising. Neuromarketing or sentiment analysis should not be used with children.

- Methods of advertising

- The responsible collection and use of personal data is intrinsic to ensuring children’s online privacy.

- Consent to collect, process and store data should be freely given, specific, informed and unambiguous.

- Advertising actors should implement a zero-data policy, and only collect the minimum amount data needed to provide a service.

- Companies should not carry out behavioural advertising based on the collection of personal data from children.

Our Children and Digital Marketing Industry Toolkit has specific recommendations for the key actors in the digital marketing industry. These include:

- Advertisers and advertising agencies should:

  - have a responsible marketing policy;
  - make sure they do not market harmful or illegal products to children;
  - make it clear that techniques such as paid-for search engine results or the use of influencers, are advertising;
  - not collect data except to deliver a service or to enable a website to

UNICEF RESOURCES FOR POLICYMAKERS

Children and digital marketing: rights, risks and opportunities

DISCUSSION PAPER MARCH 2018

- Discusses the roles, responsibilities and recommended actions of different actors, as well as the challenges faced when seeking to address how children are impacted by digital advertising.

Children and digital marketing:

INDUSTRY TOOLKIT DECEMBER 2018

- A toolkit with specific recommendations to help companies in the digital marketing sector make practical improvements to corporate policies and operations in order to support children’s rights.
function. Any data that is collected must be collected legally;

- not engage in sentiment analysis, neuromarketing or viral marketing campaigns that are targeted at children;
- make sure that adverts targeted at children are appropriate; and
- provide ways for children to delete any data collected about them.

**Ad tech companies, brokers, publishers and platforms should:**

- provide advertising solutions that don’t require the collection and processing of children’s data;
- make sure that adverts that are unsuitable for children are not delivered during times when children might be online;
- inform parents if they buy children’s data from third parties;
- only broker or share children’s data lawfully, and ideally with consent;
- not segment children based on their browsing behaviour or personal data.

**Publishers and ad networks should:**

- make sure that adverts aimed at children only appear next to content that is appropriate for them;
- ensure that sponsored search results and other opaque marketing techniques are clearly identified;
- not allow viral marketing campaigns aimed at children;
- not allow advertising on age-gated sites that addresses children directly;
- avoid profiling for marketing purposes;
- not require children to provide personal data to access games, products and services;
- enable children to understand and change their advertising preferences and privacy settings.

What UNICEF Is Doing

UNICEF believes children should be seen as rights holders, whose human rights should be respected and supported by the advertising industry. Policy makers should build, create, and enforce policies that enable and require companies to do this. UNICEF is encouraging companies across the digital marketing environment to make practical changes to their operations that result in the better protection of children.

UNICEF is creating and advocating guidance for:

- the integration of children’s rights into corporate policies and practices across the digital marketing chain;
- consistent new international standards for digital marketing; and
- companies to go from minimal legal compliance to best practice for children’s rights.

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