

What is the LGPD?

Brazil's Lei Geral de Proteção de Dados (Law No. 13,709/2018) (the "LGPD") is Brazil's new privacy law that consolidates more than 40 different statutes that formerly governed personal data. It provides Brazilian individuals with greater controls over how their personal data is collected, used, and disclosed by companies. The LGPD was originally expected to go into effect on 16 August 2020, but it now seems highly likely to become effective in early September 2020. Therefore, publishers and other Brazilian companies should prepare as soon as possible.

What does this mean for publishers?

While there's no singular roadmap to being "LGPD compliant," publishers should start to review what personal data you collect from Brazilian individuals, ensure that you keep this data secure and know who you share it with, and prepare to respond to Brazilian individuals who request information about the data that you hold about them. Since this is a robust law with many requirements, we strongly recommend that you work with your legal counsel to understand your obligations under the LGPD.

What is Taboola's position under the LGPD?

Taboola collects limited personal data from individuals who visit your websites and digital properties — but only to provide our personalized content discovery services. We make independent decisions about the processing of this data as a separate and independent controller, meaning that we are fully responsible for our use of the data. Taboola maintains a robust privacy compliance program, and we are committed to providing full transparency about our services to our customers, users, and partners. We also honor global data subject access requests, in real time, directly through our Data Subject Access Request Portal, available at <https://accessrequest.taboola.com>, and we ensure that all applicable privacy disclosures are implemented across our services.

Does Taboola require consent before processing personal data?

No, Taboola processes data under the LGPD's legal basis of legitimate interest, which means that we do not require consent in order to provide our services. However, you may separately choose to ask your visitors to give specific consent to use their data. If you do, then please let us know how you plan to pass these user consent signals, so we can ensure that we can read and honor them. If we can, then when you share a user's "no-consent" signal with Taboola, we will serve only contextually-based recommendations (that are not personalized with the use of any personal data).

Do we need to update our contracts with Taboola?

No. Our contracts are already governed by "Applicable Data Protection Law," which will include the LGPD as of 16 August 2020. The contracts also specifically outline our respective data processing obligations and roles as separate independent controllers of the data.

Where can you find further information about Taboola's data practices?

Please visit Taboola's global Privacy Policy at www.taboola.com/privacy-policy and Taboola's Cookie Policy at www.taboola.com/cookie-policy. If you have specific questions, please direct them to your designated Taboola representative.