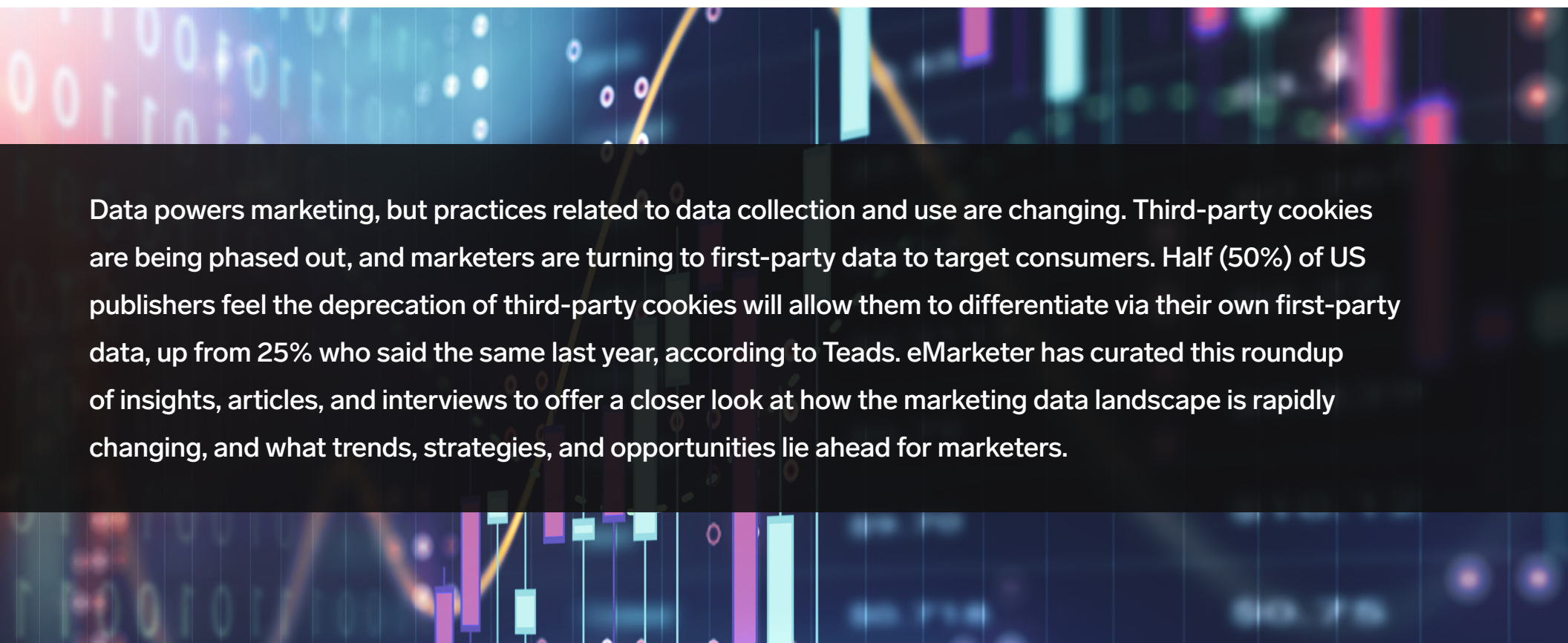


R O U N D U P

THE EVOLUTION OF MARKETING DATA

December 2022



Data powers marketing, but practices related to data collection and use are changing. Third-party cookies are being phased out, and marketers are turning to first-party data to target consumers. Half (50%) of US publishers feel the deprecation of third-party cookies will allow them to differentiate via their own first-party data, up from 25% who said the same last year, according to Teads. eMarketer has curated this roundup of insights, articles, and interviews to offer a closer look at how the marketing data landscape is rapidly changing, and what trends, strategies, and opportunities lie ahead for marketers.

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SPONSOR MESSAGE

Data collaboration has the power to transform businesses when executed in a way that preserves privacy and enhances customer experiences at scale. Whether data collaboration takes place within a single enterprise or between a brand and media partner, it delivers more valuable business outcomes, be that unlocking new revenue streams, activating strategic partnerships, or deepening brand engagement throughout the entire customer journey. It's indisputable that data collaboration will have a major role to play in 2023 marketing successes as the industry navigates economic uncertainty, new privacy legislation, and ever-evolving customer expectations.

This roundup is made possible by LiveRamp, a dynamic data collaboration platform trusted by leading companies to build strong relationships and deliver exceptional experiences. The evolution of marketing data is a critical topic to LiveRamp, and this roundup is a testament to the modern data strategies that will establish marketers as revenue drivers who put the customer first in generating better results for their brands—today and tomorrow.

We hope you enjoy the roundup.

Learn more at [LiveRamp.com](https://liveramp.com).

WHY MARKETERS ARE RETHINKING THEIR **APPROACH TO DATA**

Customers expect brands to recognize them, know their interaction history, and anticipate their needs. Meanwhile, privacy regulations and the looming deprecation of third-party cookies have emphasized the need for a proprietary identity graph for most brands. And the speed, variability, and value of different data types and sources are forcing marketers to step back and rethink their approach.

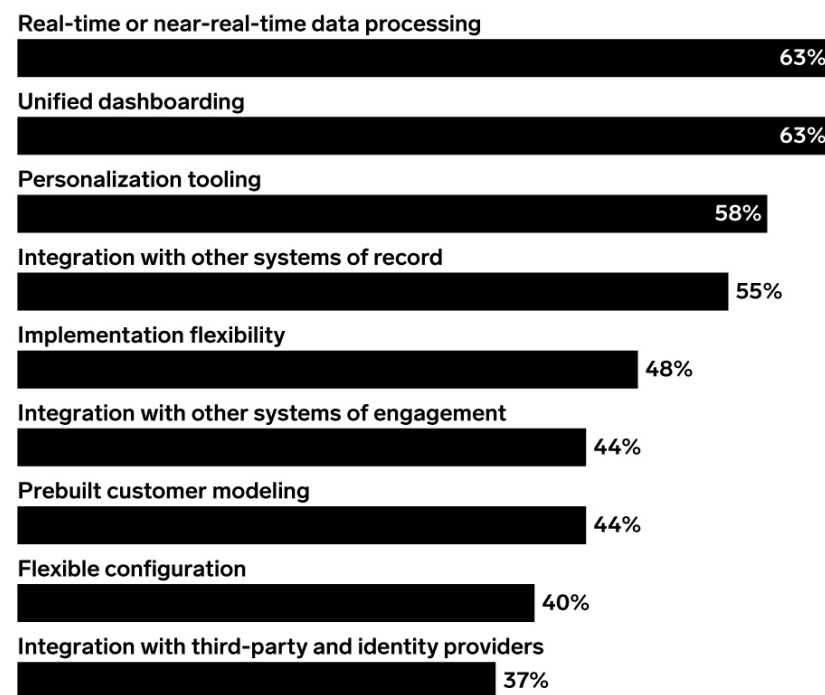
The recent explosive growth of CDPs—albeit from a standing start—reflects marketers' need to corral their data quickly and generate insights that inform in-moment interactions with consumers. Similarly, interest in data clean room providers is growing rapidly as marketers vie to extract maximum value from their first-party data and experiment with opportunities to work with the walled garden tech platforms.

As you'll see in more detail throughout this roundup, marketers are increasingly prioritizing first-party data to target consumers. Worldwide, 36% of marketing professionals expect that customer purchase history will be their most valuable source of data once third-party cookies are gone. Meanwhile, 32% see social media profiles as key, and 31% plan to rely on website registrations.

This roundup will look at the growth in CDPs and clean rooms, and explore how leading brands like The Walt Disney Co. and General Motors (GM) are using first-party data to replace third-party cookies.

Customer Data Platform (CDP) Capabilities That Are Most Important to Meeting Their Customer Data Goals According to US CDP Professionals, Jan 2022

% of respondents



Note: n=313

Source: Forrester Consulting, "Marketers Need CDP Solutions That Transcend Data Management" commissioned by Zeta Global, May 17, 2022

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GOOGLE DELAYS **THIRD-PARTY COOKIE** SUNSETTING

Google is postponing the implementation of its plan to remove third-party tracking cookies from its Chrome browser yet again, to the second half of 2024, per Insider.

In a post after the news broke, Google Privacy Sandbox vice president Anthony Chavez wrote that the advertising giant had received “consistent feedback” that stakeholders needed “more time to evaluate and test the new Privacy Sandbox technologies” before Chrome deprecated third-party cookies.

Google said that it will extend developer testing for its Privacy Sandbox technologies and start allowing Chrome users to trial the new environment beginning in August.

We’re not accidentally rerunning an old story; if the sequence sounds familiar, it’s because this has happened before. In January 2020, Google had stated that “within two years” it would stop supporting third-party cookies in Chrome. However, last year, Google extended the deadline to late 2023.

Half (50%) of US publishers feel the deprecation of third-party cookies could be an opportunity to differentiate via their own first-party data, up from 25% who said the same last year, according to Teads. Knowledge about cookies has also increased, with 30% of publishers saying they had a “strong understanding” of cookies compared with 23% in 2021. The number saying they had “limited to no knowledge” dropped to just 6%.

Considering they’re still dealing with Apple’s privacy changes, inflation, and fluctuating ad expenditures, many should be breathing a sigh of relief.

Early adopters “have a chance to further refine their strategies and prove out effectiveness against historical cookie-based metrics, and may be able to take off the training wheels before the deadline hits, which would be ideal,” said analyst Evelyn Mitchell.

Ad tech firms that have benefited from the cookie regime should stand to benefit in the short term. Following the announcement, The Trade Desk, ironSource, and PubMatic all saw gains surpassing the market at large.

Other browsers, such as Mozilla’s Firefox and Apple’s Safari, have made the decision to disable third-party cookies by default to appeal to privacy-conscious consumers. Though admittedly it’ll be hard to take much market share from Chrome, this new delay will allow these players to consolidate their hold on such consumers.

50% of US publishers feel the deprecation of third-party cookies could be an opportunity to differentiate via their own first-party data, according to Teads.

However, this could be a blow to upstart vendors who are trying to woo brands and agencies to their post-cookie solutions.

In July, Seedtag announced over \$250 million of funding for its cookieless contextual advertising solution. While other vendors will undoubtedly look to introduce post-cookie alternatives, the pushback of the deprecation date could make it harder to sell these solutions.

Procrastinators may even count on yet another delay that never comes. While many brands, agencies, and publishers became more prepared for the cookieless future in 2022 than the year prior, there are laggards who undoubtedly will wait until the last second to get their houses in order.

Google isn't exactly a loser here—it's showing it's responsive to stakeholders, after all—but pushing a major deadline back repeatedly isn't a great look.

Only 13% of US publishers were firmly committed to Chrome's Privacy Sandbox as a standard, per Advertiser Perceptions, with another 35% aware of it and actively exploring how to implement it.

Many brands could find this prolonged waiting period annoying, given ambiguity around the cookieless alternatives on the market.

"While this might be a short-term relief to marketers and advertisers, obviously it's just a stay of execution," said principal analyst Dave Frankland. "But in the medium term, it will just add to the market confusion as even more alternative solutions appear and/or we'll see more experimentation."

Although much of the digital economy—including mobile apps and connected TV (CTV)—do not rely on third-party cookies, Chrome represents 2 in 3 browsers used on a global basis. Given that, Google's pushing back the deprecation of third-party cookies is huge.

But regardless of the deadline, investing in the cookieless future sooner rather than later is a wise bet for all stakeholders.

US Data Leaders Who Were Somewhat/Very Prepared for the Loss of Third-Party Cookies/IDs, by Company Type, 2021 & 2022

% of respondents in each group

Ad tech/data



Publisher



Agency



Brand



Total



■ 2021 ■ 2022

Note: 2021 n=203; 2022 n=204; top two responses

Source: Interactive Advertising Bureau (IAB), "State of Data Report" conducted by Ipsos, Feb 8, 2022

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HOW **FIRST-PARTY DATA** IS REPLACING THIRD-PARTY COOKIES

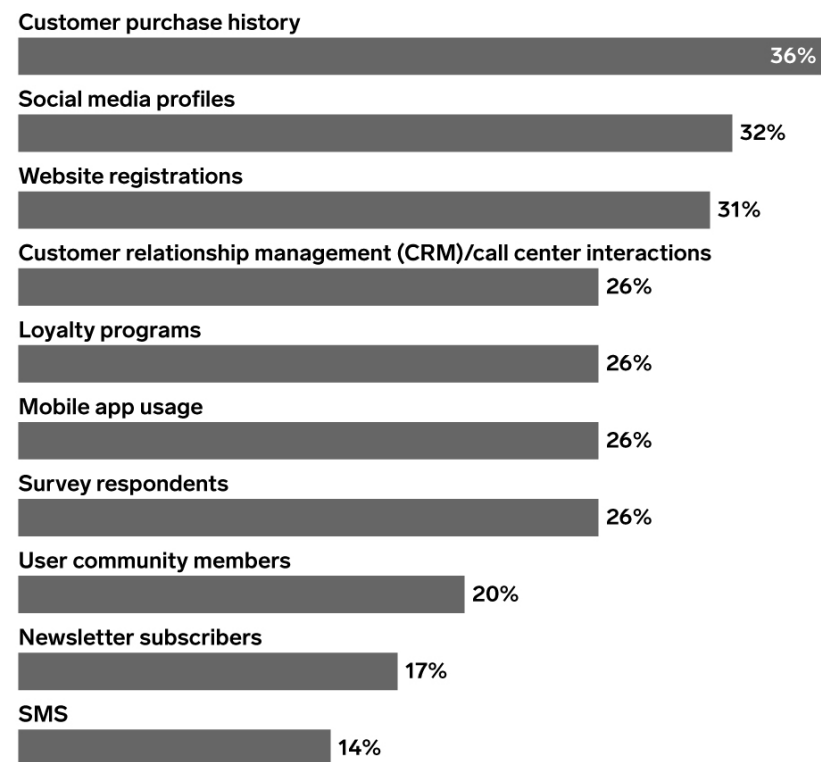
In preparation for the cookieless future, marketers are homing in on first-party data to target consumers. Worldwide, 36% of marketing professionals expect that customer purchase history will be their most valuable source of data once third-party cookies are gone. Meanwhile, 32% see social media profiles as key, and 31% plan to rely on website registrations.

The impending deprecation of cookies in Google Chrome has created a new strategic landscape for advertisers, but the long runway for this change—now extending into 2023—offers some breathing room. In the US, 86% of marketing decision-makers relied on third-party cookies to some extent, per an October 2021 study by Sapio Research. That said, 68% of US industry leaders don't expect the demise of third-party identifiers to affect revenues, per January 2022 polling by the Interactive Advertising Bureau (IAB).

36% of marketing professionals worldwide expect that customer purchase history will be their most valuable source of data once third-party cookies are gone.

Which First-Party Data Sources Will Be Most Valuable to Marketing Professionals Worldwide in 2022 to Address the Loss of Third-Party Cookies?

% of respondents



Source: Ascend2 and Oracle, "Marketing Trends 2022: Marketers Tell All About Successes, Struggles, and Solutions," March 29, 2022

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MARKETERS BEGIN SHIFTING TO **FIRST-PARTY DATA**

For now, third-party data is still available and widely used, especially in streaming. But first-party data is the talk of the town as the ad industry prepares for—and contends with—signal loss.

Across the buy and sell sides, everyone who's able is beefing up their first-party data strategy. Since last summer, many senior decision-makers at brands, agencies, and publishers have made moves to collect and manage first-party data by investing in systems, governance, and personnel, according to interviews conducted in July 2022 by MediaScience on behalf of the IAB.

The practical applications of brands' first-party data in advanced TV abound. Advertisers can use first-party data to unearth audience insights and inform campaign optimizations and targeting strategies. First-party data can also supplement measurement solutions.

Of course, scale is a challenge, especially for smaller publishers and brands, who may not have the bandwidth or capital to implement robust first-party data infrastructures. The IAB found scale and data quality were the top issues cited by its interview subjects, who hailed from companies large and small.

The race for first-party data is driving a shift in power dynamics. Businesses that already have it are better positioned to take the advanced TV market by storm. Those that don't are not only behind, they're also beholden to data purveyors.

And without question, it's no longer sustainable to depend solely on third-party data. But experts agree that third-party data can still play a role in the future of advanced TV by enriching first-party data sets.

Strategies US B2B Marketers Are Prioritizing in Response to Data Privacy Changes, May 2022

% of respondents

Prioritizing first-party data collection and utilization

47%

Building independent, cross-channel measurement capabilities

39%

Diversifying strategy across more channels

31%

Consolidating strategy across a few key channels

29%

Investing in a Customer Data Platform (CDP), data clean room, or other first-party identity solutions

27%

Finding new sources of third-party data

27%

Going up the funnel to create additional demand

21%

Other

6%

Source: Ascend2 and Wpromote, "State of B2B Digital Marketing," July 26, 2022

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WHY **CLEAN ROOMS** ARE IN VOGUE WITH ADVERTISERS, PUBLISHERS, AND VENDORS

Data clean rooms are moving into the mainstream as businesses begin phasing out third-party identifiers, with advertisers prioritizing such solutions above other marketing technology (martech) priorities.

Everyone wants a “clean room,” so naturally, vendors glom onto the term and all define it somewhat differently.

In essence, clean rooms (in theory) are a more secure way for platforms and marketers to intersect data sets without actually sharing the data.

Multiple parties are able to cross-reference first-party data that has been stripped of personally identifiable information in these secure digital settings to generate audience and campaign insights.

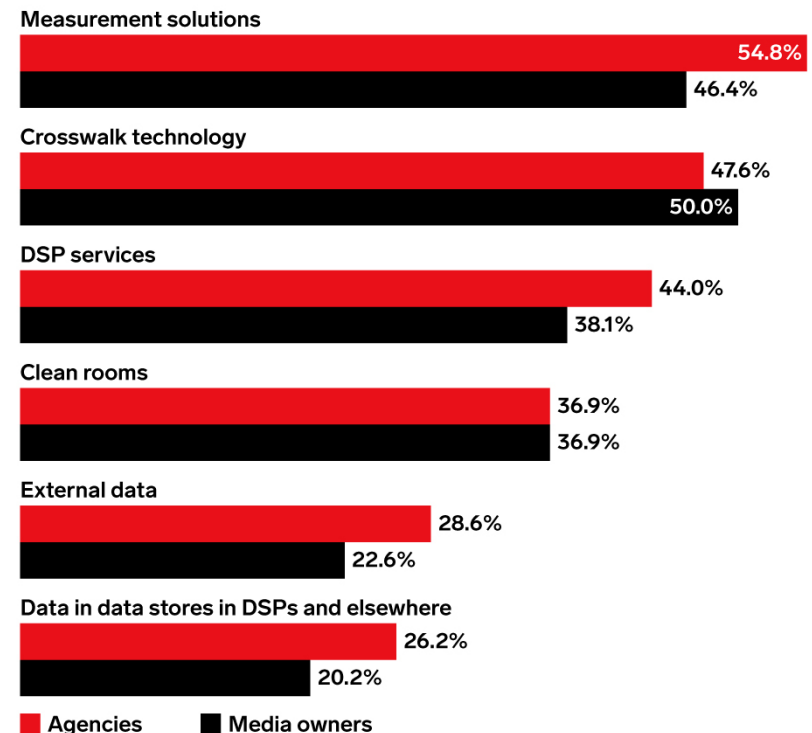
Clean rooms can assist in organizing the data that providers offer, along with who they share it with and why.

In June, we reported that data cloud provider Snowflake is working on a cross-platform and cross-publisher clean room with advanced advertising firm OpenAP; the first publishers to take part will be Warner Bros. Discovery, NBCUniversal, Fox, and Paramount, which all jointly own OpenAP.

In July, Disney partnered with The Trade Desk, combining the former’s user data from its clean room with the latter’s Unified ID 2.0 initiative, a third-party cookie replacement that’s already been adopted by Nielsen, LiveRamp, and Criteo.

Areas Where US Agencies/Media Owners Expect to Increase Expenditure, May 2022

% of respondents



*Note: respondents all involved in advanced TV (either supplying or buying advanced TV solutions)
Source: Winterberry Group, "Outlook for Identity in Advanced Television: Challenges and Opportunities," June 14, 2022*

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In September, GM became the first brand to merge its data with NBCUnified, a data portfolio that allows brands to combine their first-party data with information from across NBCU properties.

What constitutes identifiable data and what qualifies as anonymous data is a significant issue. In July, the Federal Trade Commission warned advertisers against collecting “anonymous” data that could be linked to identify individuals. Clean rooms provide data owners with a secure setting in which to store and query their data—but those who hold the data are still responsible for getting customers’ permission before using it.

Data clean rooms aren’t entirely secure nor fully private in some circumstances, according to Dennis Buchheim, vice president of Meta’s advertising ecosystem, who expressed the sentiment at an IAB event in September.

Buchheim’s comments may be viewed as blasphemy by ad tech companies and publishers who have enthusiastically embraced the concept—but, it’s important to note, Meta has a vested interest in discouraging a trend that may make advertisers less beholden to the social media giant’s vast data set.

Although clean rooms don’t reveal any private customer information, in practice the increased number of participants and data sources raises security concerns. For that reason, businesses need to work to implement consistent security and privacy rules or risk being called out on that by an increasingly tech-savvy consumer base.

Data clean rooms are moving into the mainstream as businesses begin phasing out third-party identifiers, with advertisers prioritizing such solutions above other martech priorities.

HOW COMPANIES ARE MANAGING THEIR DATA STRATEGIES

The end of support for third-party data can seem surreal. But even with Google's deadline nearly two years away—and uncertainty swirling around whether that deadline will even stick—there are many things publishers can expect.

Make your own quilt pattern

Many marketers agree that the third-party cookie will not be replaced by a single solution. Publishers will have to figure out a combination of solutions that allows them to capitalize on changing advertiser attitudes toward a number of ad targeting practices, including contextual targeting, retargeting, matched audiences, and others.

Participate in initiatives that build industry power around publisher-centric solutions

Many of the products and initiatives that publishers are most excited about are quite new and have yet to gather traction among ad buyers. Building advertiser trust in things such as seller-defined audiences must be built one deal at a time, and they will be crucial, especially for publishers that do not have the scale or technical expertise needed to test and incorporate different identity solutions.

Continue to stay focused on solutions that minimize data leakage

Publishers will have to test and optimize their approach to selling in ways that minimize data leakage. As the market acclimates to its more balkanized state, publishers have an opportunity to shape how ad buyers access the inventory they want.

But even with Google's deadline nearly two years away—and uncertainty swirling around whether that deadline will even stick—there are many things publishers can expect.

How US Data Leaders Expect the Coming Changes to Third-Party Cookies and Identifiers Will Affect Their Company's Use of Data, 2021 & 2022

% of respondents

	2021	2022
Change our approach to attribution modeling (e.g., model types, teams to run the models)	26%	42%
Expand our engagement with third-party industry groups seeking to build "post-cookie" identity resolution solutions	27%	43%
Increase focus on developing custom/in-house identity resolution solutions	39%	42%
Increase spending/emphasis on contextual advertising	24%	42%
Centralize all customer/customer relationship management (CRM) data into one repository (or begun efforts to do so)	35%	41%
Increase spending/emphasis on use of first-party data	42%	41%
Increase interest in third-party identity resolution solutions	30%	37%
Change our approach to campaign and audience measurement	45%	34%
Conduct an audit of our third-party data providers and other supply chain partners	18%	32%
Increase use of AI solutions for consumer insight development and marketing decision-making	31%	31%

Note: 2021 n=121; 2022 n=125

Source: Interactive Advertising Bureau (IAB), "State of Data Report," Feb 8, 2022

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CASE STUDY: CTV SUCCESS RELIES ON FIRST-PARTY DATA STRATEGY

With a growing number of streaming channels, it can be challenging for marketers to put together a comprehensive CTV strategy.

But it's never been more important to do so. This year, we estimate that CTV ad spend will total \$21.6 billion. As growth accelerates, that number will reach \$37.45 billion by 2025.

Here are some tips for marketers looking to get a piece of the pie.

Leverage your first-party data, if you've got it

"This is your point of differentiation, your point of efficiency—it's your ability to hone in on your most valuable prospects and customers," said Joel Cox, co-founder of Strategus, during an Advertising Week session in October.

Through customer segmentation, marketers can identify similar users and find out more about them.

Don't abandon third-party data. "First-party data can and should be at the forefront of strategies, but in many cases, third-party data can be used in a number of functions to enhance that," said Cox.

Lean on your tech partners

There are over 200 ad-supported streaming apps in the market today, according to Cox, and it's overwhelming to think about how to find your target audience.

The solution, says Cox, is partnering with supply-side platforms to set up private marketplace deals that allow brands to have control over when and how frequently your audience sees an ad.

Cox recommends setting up invite-only auction arrangements to ensure that your ads are going into the right content and platforms.

Don't stop at the TV

The average household has nearly 15 connected devices, not including wearables, says Cox.

By using household identity graphing, marketers can target other connected devices in a household and use that to serve follow-up messages.

For example, if a marketer serves an impression to a smartphone that the audience is using while watching TV, it achieves immediate frequency, reduces costs (as online display and video impressions are cost-efficient), but also gives the audience member clickability, which brings them back to the site for retargeting, analytics, and measurement.

Define outcomes and optimize

Every campaign should have different key performance indicators. Before a single impression serves, marketers need to be clear about what action they want their audience to take.

Don't forget that a purchase may not be the end all be all, says Cox. "To simply focus on the purchase without any visibility in the middle is short-sighted and doesn't give you any ability to optimize."

Above all, make sure you test and iterate. "If you're not testing continuously on your CTV campaigns, you're missing out on a ton of opportunities," said Cox.

GAIN A COMPETITIVE CUSTOMER EDGE WITH DATA COLLABORATION

This sponsored article was contributed by [LiveRamp](#).



Daniella Harkins
SVP, Go-to-Market, LiveRamp

In today's macroeconomic situation, marketing budgets are at risk. Ad spend must be tied to incremental sales; teams are slimmer, impacting a marketer's ability to derive consumer insights; and technology budgets have never been higher.

Brands may need to spend up to 200% more to maintain healthy campaign metrics, according to the Interactive Advertising Bureau, so it's a lot to manage overall.

Underpinning each of these challenges is a lack of access to data, which is critical not only to drive results and revenue but also to develop consistent customer relationships. As new privacy regulations pass and third-party cookies disappear, data collaboration is an opportunity to enrich first- and second-party data with data partnerships that provide new, more comprehensive customer insights in a privacy-centric way.

But data collaboration doesn't happen overnight. First, you must ensure your marketing strategy encompasses effective, secure data management. Here are three ways to prepare for data collaboration that will ultimately strengthen your marketing strategy and forge new customer bonds.

① **Connect internal data silos to uncover new customer insights.**

The first step toward a data strategy that's primed for collaboration is to unite internal data silos that could be inhibiting visibility across the entire customer journey. Doing so creates immediate opportunities to use your first- and second-party data to uncover new insights for stronger customer personalization and engagement, which leads to long-term loyalty.

For example, by uniting customer service data with customer relationship management data, you can automate the pausing of outbound communications like email and ads until a customer's issue is resolved. Once their ticket closes, you can send a "surprise and delight" message. Use cases like this can help shift the perception of marketing to a revenue driver with a direct impact on the company's ROI.

② **Promote a data strategy that puts customer privacy first.**

There are ways to make data accessible across internal, and external teams without losing fidelity or compromising consumer privacy. This is where privacy-enhancing technologies (PETs) come in. PETs accelerate safe internal and external data collaboration, build customer intelligence, and maximize the value of data for external collaboration without relinquishing control or compromising consumer privacy. Through a layered approach, PETs allow marketers to control the end-to-end flow of information while gathering useful insights for business outcomes and customer satisfaction.

③ **Use an identity solution that makes customer insights whole.**

An identity solution can help you fill gaps in the customer journey and offer greater assurance that your customer records are current and complete. Every brand has countless customer journeys, and the "right outcome" can look different even within the same campaign based on the audience and their preferences. Identity shines in connecting data so brands can shift goalposts as needed and accurately measure outcomes. This helps deliver campaigns that are directly tied to increased ROI.

As consumer behavior continues to be anything but predictable, creating impactful customer connections will continue to be a challenge. Learn how you can build a collaborative data strategy that reshapes marketing and customers first with [LiveRamp](#).



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CMO VIEW: **MARKETING MEASUREMENT** IS ESSENTIAL



Dipti Kachru

Global CMO, Broadridge

Dipti Kachru spoke with Insider Intelligence about her insights into the rapidly evolving role of the CMO, the trends and challenges affecting her, and how she measures the success of marketing initiatives. Below are highlights from our conversation with Kachru.

Insider Intelligence (II): What's changed about the CMO role over the last few years?

Dipti Kachru (DK): Marketing is seen as a proven growth driver—the maturity of marketing technology and data science has helped the CMO in this, making the marketing playbook more surgical and efficient.

The CMO of today needs to be a storyteller, technologist, data scientist, and business strategist all in one!

II: Before you joined Broadridge, you spent several years as a CMO in the wealth management division at Chase. How does the CMO role differ within a technology provider compared with a wealth management firm?

DK: What truly differs is how you apply the marketing tools to the B2B purchase journey. Especially when I compare my role today to being a retail CMO, the scale is often very different—how you use various media channels is different for higher-consideration purchases with a much smaller pool of buyers and how you measure efficacy varies.

I would also say that building an ownable brand supported by strong, relevant messaging and storytelling is often more critical in B2B marketing. Traditionally, there has been a lot of focus on the sales

narrative. As purchase behaviors change, I'm seeing a need for more focus on improving our storytelling in marketing to break through the competitive clutter and drive recall.

II: What are the main trends and challenges affecting you today?

DK: Customers expect brands to be more relevant. Personalized communications are the norm and organizations that don't invest in the right data and tech tools will deliver a subpar experience.

Second, data privacy is both a significant trend and a challenge facing today's marketers. Data is the primary part of popular AI-driven marcom platforms, but customer concerns around privacy are growing. Though I would argue this could be beneficial: By giving the customer the ability to share information or opt into a communication, you can develop a more engaged relationship. Of course, this also raises the bar and expectations on personalization and relevancy.

II: How do you measure the success of marketing initiatives?

DK: Having a strong measurement framework and the discipline of upfront planning is critical to a performance-marketing culture. More recently, I have observed that for many, access to significant amounts of data has actually made marketing measurement less effective. I often ask my team for the “so what?” of a marketing data point. Given my retail marketing background, the holy grail is to prove ROI, but in B2B that is harder, especially when purchase cycles are longer. In addition to the expected measurement around leads and funnel conversion metrics, we are also working with our analytics teams to define and validate what we call “beacons of success”—milestones and customer behaviors that are predictive of future success. For example, actions that nurture the sales process or help accelerate the customer's decision to purchase.

BENEFITS OF FIRST-PARTY DATA: BRANDS OFFERING PERSONALIZATION WITHOUT INTERFERING WITH PRIVACY

Consumers want personalized ad experiences, but not at the cost of their privacy, according to Twilio's "State of Personalization" report.

Consumers said personalization is important in determining whether they'll make repeat purchases with a brand or service, but the other side of the coin creates a conundrum for marketers.

Forty-nine percent of consumers said they would likely become repeat buyers if offered a personalized experience by a retail brand.

Another 62% said they not only want, but expect personalization, and that a brand that doesn't offer a personal experience could lose their business. That's up from 45% in 2021, showing personalization is becoming a key competitive advantage for brands.

Eighty percent of business leaders say customers spend 34% more (on average) when offered personalized shopping experiences.

While the demand for personalization is clear, the study showed brands are woefully ill-equipped to meet it.

Only 35% of companies said they felt they achieved omnichannel personalization. Forty-seven percent of companies offer personalized experiences based on live consumer data, meaning over half are missing out on a significant aspect of personalization.

Attitude of Consumers Worldwide Toward Personalization and Customer Experience Provided by a Company, 2020 & 2022

% of respondents

The experience a company provides is as important as its product or services



I expect companies to understand my unique needs and expectations



I expect companies to anticipate my needs



I feel an emotional connection to the brands I buy from the most



I expect offers to always be personalized



Most companies treat me as a number



■ 2020 ■ 2022

Note: ages 10-58

Source: Salesforce, "Fifth Edition State of the Connected Customer," May 13, 2022

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It may seem like an easy win to personalize a shopping or advertising experience, but the current state of policies, regulation, and consumer sentiment around privacy make personalization a huge challenge for advertisers.

Facing a sea of changes at the hands of Google and Apple, many brands are building their own systems for gathering first-party data. Thirty-seven percent of brands exclusively use first-party data in personalization, up from 31% last year, according to Twilio.

One marketing channel offers personalized experiences without intrusive data collection: email. Email marketing has proved relatively resistant to rising trends like data privacy changes and consumers' distaste for social media and digital ads.

A recent report from CheetahDigital found that 55% of consumers are more comfortable giving brands personal information if it's at their discretion and used to their benefit.

That same report found that email marketing's ability to drive sales exceeded social and display advertising, which consumers largely distrust, by 105%.

"Consumers don't consider the challenges to well-executed personalization; they simply expect relevant content delivered at the right time and place," said principal analyst Dave Frankland, author of our Spotlight on personalization.

For brands stumbling to adjust their marketing strategies in a rapidly changing landscape, the road ahead may not be so painful.

Email marketing and loyalty programs, among others, offer ways to build relationships with consumers while avoiding the data collection that they explicitly don't want.

The current ad environment also offers an opportunity for brands to begin fleshing out their own ad systems, either via partnerships like those struck by Michaels and others, or by developing the technology themselves.

55% of consumers are more comfortable giving brands personal information if it's at their discretion and used to their benefit.

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Kristen Riebesell	Senior Director, Media Solutions and Strategy
Laura Williams	Art Director, Content Studio
James Wohr	Copy Editor, Content Studio
Matt Wujciak	Writer, Content Studio