Dear Ofcom Online Safety Team,

MyData Global's UK Hub welcomes Ofcom's consultation on the Fraudulent Advertising Codes of Practice. Fraudulent adverts can cause financial loss, distress and lasting damage to trust. We support Ofcom's proposals to check advertiser accounts, protect them against takeover, assess suspicious adverts, strengthen reporting and make advertising information more accessible.

The MyData Declaration calls for a human-centric approach in which people have meaningful control over their personal data and can make informed choices about their relationships with organisations. From that perspective, protection should continue beyond the point at which a platform detects or removes a fraudulent advert. People also need to understand who is approaching them, what they are being asked to do, and what happens if they respond.

We recommend that Ofcom strengthen its final codes and guidance in five areas.

1. Make advertiser provenance meaningful to the person viewing an advert. A person should be able to identify the advertiser behind an advert, distinguish that advertiser from an agency or account operator, and reach an effective reporting route. Where a platform describes an advertiser as "verified", it should explain what was verified. Verification of identity or authority must not imply that an offer, product or claim has been endorsed.

2. Establish a reliable chain of authority. We support Ofcom's proposal to check that an account holder acts for the person or organisation advertised. That relationship should remain current when accounts, agencies or permissions change. Independently certified digital verification services under the UK Digital Verification Services Trust Framework could provide reusable evidence of identity and relevant attributes. Platforms would still need to check authority to act, assess the advert and secure the account. Reuse of suitable evidence could reduce repeated document collection and the Friction, Effort, Risk and Cost borne by legitimate advertisers.

3. Help people assess the transition from advert to interaction. An advert may lead someone to a website, form, payment request, messaging channel or continuing service relationship. Ofcom should encourage platforms to consider whether the advertiser and destination remain consistent across that journey, especially where a person is asked to disclose personal data or make a payment. Clear information at that point can help a person recognise impersonation or an unexpected change of party.

4. Apply data minimisation to support fraud prevention. Effective checks should not require every platform to retain unnecessary copies of identity documents or collect more information about the people seeing adverts. Platforms should use proportionate

assurance, disclose only relevant verified claims and protect the information used for account checks, ad libraries and complaints.

5. Give people usable evidence and routes to remedy. Ad libraries and reporting tools should help a person or trusted representative identify a specific advert, report a suspected scam and understand what happened to the report. Where an advert has led to an interaction, a record of the advertiser, the offer and the terms presented would help resolve a subsequent dispute.

MyData Global's MyTerms work offers a further direction for exploration. It seeks to make the terms governing a person's digital interactions more understandable and to give individuals a meaningful way to express and manage their own terms and preferences. In the advertising context, the immediate opportunity is to make the move from viewing an advert to sharing data, agreeing to terms or paying for a service clear and accountable. We suggest that Ofcom consider this in future work with consumer, privacy and advertising stakeholders. We recognise that person-set terms are an extension to, rather than an existing requirement of, the proposed fraudulent advertising codes.

We support an outcome-based approach that accommodates different technical methods while holding platforms accountable for whether people are protected in practice. The MyData Global UK Hub would welcome engagement with Ofcom on how advertiser assurance, clear terms, personal data control and effective remedies can work together.

Yours faithfully,

David

David Alexander FRSA

MyData Global Board Member - Member Representative for Not for Profit Members

MyData UK Hub Co-Chair