



3/7/2023

Commonwealth Law Conference-2023

D6- Online Media giants may be “too big to care” but can the law make them care

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D6: Online media giants may be “too big to care”- But can the law make them care?

“The digital revolution began with great promise. When did you start worrying that the tech giants driving it were becoming more interested in exploiting us than serving us?” – The Harvard Gazette, *Q & A with Shoshana Zuboff*.

1.0 Introduction

Online Media Use Statistics

Social media are websites and software programs used for social networking.¹ Simply put, a social media platform or networking site is a platform that allows people, mostly, from similar backgrounds or with similar interests to connect online.² Examples of online media giants include but not limited to: TikTok, Meta’s Facebook, Instagram & WhatsApp Messenger, Snapchat, Telegram, Twitter, LinkedIn, Pinterest, Netflix, YouTube, Spotify, Vimeo, DSTV/Super sport, amongst others.

A cursory examination of the 2023 Data Reportal statistics depicts 10.55 million users in January 2023.³ In the outset, digital adoption and use in Kenya stood at 32.7 percent with 17.86 million Kenyans accounting for the internet penetration in January 2023.⁴ An analysis of the social media usage statistics shows that Facebook had 9.25 million users, YouTube had 9.44 million while Instagram and LinkedIn had 2.20 million and 3.50 million users and members, respectively, in January 2023.⁵ The same connotes a discernible increase in overall social media use compared to January 2022.⁶

With the above statistics of social media presence and use as the departure point, it is quite evident that social media indeed affects how people operate; i.e. communicate, work and shop. At this juncture, it is therefore imperative to analyse business models used together with the advantages and disadvantages of social media.

¹ <https://www.oxfordlearnersdictionaries.com/definition/english/social-media?q=social+media>

² Guidelines 8/2020 on the targeting of social media users (Adopted on 2nd September 2020) page 3

³ Simon Kemp, “Digital 2023: Kenya”, 13th February 2023. Accessible at <https://datareportal.com/reports/digital-2023-kenya>

⁴ ibid

⁵ ibid

⁶ <https://datareportal.com/reports/digital-2022-kenya>

How the Social Media Business Processes Data

A number of scholars have proffered that the social media model relies on leveraging individual users' data to push highly-personalized content as part of increasing their scroll time.⁷ As a consequence, social media sites indeed influence the users' individual capacity to make independent decisions through the collection, analysis and monetizing the collated data with a view to make profits.

Nick Srnicek further discusses the following types of platform-based businesses and how they process data: *advertising platforms*, such as Facebook and Google that extract and monetize user data on ad space.⁸ Secondly, *cloud platforms* such as Salesforce, Amazon Webservices and Microsoft Azure that own and rent out both software and hardware,⁹ while *industrial platforms* such as Siemens and GE that have transformed from traditional manufacturing into internet connected processes, through deployment of requisite infrastructure.¹⁰ On the other hand, Spotify and Rolls-Royce constitute *product platforms* that rely on other platforms to improve traditional goods into services.¹¹ Lastly are *lean platforms* such as Uber, Airbnb and DoorDash whose business model is anchored on minimal asset ownership.¹²

Other companies that have commercialized (monetized) their technological platforms to compound new products in the market, services, developer ecosystems and business models include Amazon, Apple, Tesla, Facebook and Google.¹³

Implications of the use of Social Media

The use of social media has had both positive and negative implications. Some of the **positive implications of social media** include:

⁷ Dipayan Ghosh, Are we Entering a New Era of Social Media Regulation? (Harvard Business Review, 14th January 2021) Available at <https://hbr.org/2021/01/are-we-entering-a-new-era-of-social-media-regulation>

⁸ Nick Srnicek, Platform Capitalism (Wiley, 2016) at 33-36

⁹ *ibid* at 36-38

¹⁰ *ibid* at 38-40

¹¹ *ibid* at 40-43

¹² *ibid* at 43-48

¹³ Susan Etlinger, The Next Wave of Platform Governance (14th May 2021) Accessible at <https://www.cigionline.org/articles/next-wave-platform-governance/>

Based on the adage that through the internet, the world has been transformed into a 'global village', individuals, mostly users use social media networks to not only engage in interacting with their family and friends who might be continents apart at the snap of a button.¹⁴ Social media platforms also provide a great source of entertainment to the users based on the diversity of the content and media posted from time to time.¹⁵

Further, most trainings and webinar sessions hosted through other virtual platforms such as zoom and Microsoft teams are usually streamed on a myriad of social media platforms, mostly Facebook hence increased accessibility in terms of target audience due to the attendance cap imposed on most virtual meeting apps.¹⁶ Other social media platforms, such as Twitter Spaces have also offered an alternative to hosting virtual meetings and discussions.¹⁷

The ability to influence a larger audience due to the infinite bandwidth essentially offered by most social media platforms, has made most of the platforms be used as conduits for real time data and advertising.¹⁸ For instance, the users who listen to or watch videos on TikTok then proceed on Spotify or YouTube to find and stream the actual videos boost views and the statistics of users who have accessed the respective sites. In the same vein, social media platforms are also used to increase traffic and access to website, mostly by marketers and music artists based on the links posted in the users' profiles.

On the other hand, **negative implications of social media** include:

Social media use has caused *culture erosion, abrasion and deflation* as most users tend to be assimilated into western approaches towards what they interact with in the course

¹⁴ <https://digitalscholar.in/pros-and-cons-of-social-media/>

¹⁵ ibid

¹⁶ <https://www.facebook.com/live/create>

¹⁷ <https://help.twitter.com/en/using-twitter/spaces>

¹⁸ Jonathan Durante, Three Reasons You Should Be Advertising on Social Media In 2021 (Forbes, 12th March 2021) Accessible at <https://www.forbes.com/sites/forbesagencycouncil/2021/03/12/three-reasons-you-should-be-advertising-on-social-media-in-2021/?sh=38ada0c23f52>

of using the social media platforms.¹⁹ Examples include videos posted on TikTok and movies watched via Netflix.

Unmoderated user content, attributable to a lot of experimentation and minimum or lack of oversight compounded by the speed of technology and the complexity of data-and-algorithm decision making. Some of the media giants such as Facebook have been used as ethnic cleansing tools in Myanmar in 2017 and 2018,²⁰ broadcasting live proceedings of the Christchurch killings,²¹ and the 2018 Facebook-Cambridge Analytica scandal.²²

Surveillance capitalism which not only undermines personal autonomy, but it also erodes democracy.²³ Quite significant at this juncture is Shoshana Zuboff's warning on the dazzling nature and effects of digital revolution. She opines and warns how high-tech giants exploit our personal data for their own ends through their 'lights, bells and whistles' which have made users blind and deaf.²⁴ The syllogism is informed by how Silicon Valley and other tech giants predict and shape their users' data through data analytics and data mining.²⁵

Other negative implications include: hacking of social media accounts which has been prevalent with the rising number of users, cyber bullying and cyber harassment; distraction and addiction to social media based on dependence and constant use of the platforms;

¹⁹ Duane Varan, The Cultural Erosion Metaphor and the Transcultural Impact of Media Systems, *Journal of Communication*, Volume 48, Issue 2, June 1998, Pages 58–85, <https://doi.org/10.1111/j.1460-2466.1998.tb02748.x>

²⁰ The New York Times, A Genocide Incited on Facebook, with Posts from Myanmar's Military (15th October 2018) Accessible at <https://www.nytimes.com/2018/10/15/technology/myanmar-facebook-genocide.html>

²¹ Jack Gramenz, Christchurch mosque attack livestream: Why Facebook continues to fail (New Zealand Herald, 17th February 2020) Accessible at <https://www.nzherald.co.nz/business/christchurch-mosque-attack-livestream-why-facebook-continues-to-fail/R3M3W6ICYBKSRAB35N6H4K5SYI/>

²² Julia Carrie Wong, The Cambridge Analytica Scandal changed the world-but it didn't change Facebook (The Guardian, 18th March 2019) Accessible <https://www.theguardian.com/technology/2019/mar/17/the-cambridge-analytica-scandal-changed-the-world-but-it-didnt-change-facebook>

²³ John Laidler, High tech is watching you (The Harvard Gazette, 4th March 2019) Available at <https://news.harvard.edu/gazette/story/2019/03/harvard-professor-says-surveillance-capitalism-is-undermining-democracy/>

²⁴ *ibid*

²⁵ Zuboff Shoshana, and Karin Schwandt. *The Age of Surveillance Capitalism: The Fight for a Human Future at the New Frontier of Power*. Profile Books, 2019.

the constant use of the social media platforms further leads to time wastage, and lastly, most users have grappled with fake news at some point in the course of their usage of social media platforms.²⁶

2.0 Are Regulatory Frameworks providing oversight?

It is not lost to this paper that globally, the regulatory environment is far from ideal, as law is sluggishly tracking the rapid advancement in technology.²⁷ This section analyses how national laws have provided oversight, the regulatory challenges that have saddled regulators in their oversight role and some of the opportunities for enhancing efficient and effective oversight.

How national laws have provided oversight

A study of some of the thumbnail sketches of the regulatory paradigms deployed by most countries shows lack of a universal model for online media giants' regulation.²⁸ Each country's regulation is neither informed by the technology nor law, but by the culture and the specific concerns.²⁹ While some countries such as Singapore,³⁰ Germany, China,³¹ and South Korea, adopt a multipronged approach to internet censorship, others such as the USA, Canada and the European Commission provide for either the establishment of regulators or a voluntary code on internet use.³² Ellickson further uses personal ethics, contractual positions, norms and law to categorize regulatory frameworks as captured below:³³

Regulator	Substantive Rules	Sanctions	Mechanism
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²⁶ <https://digitalscholar.in/pros-and-cons-of-social-media/>

²⁷ ODPC Strategic Plan FY 2022/3-2024/5, Page 3

²⁸ Peng Hwa Ang, How Countries are Regulating Internet Content (Nanyang Technical University, Singapore)

²⁹ *ibid*

³⁰ Singapore Broadcasting Authority, established under the Singapore Broadcasting Authority Act, No. 15 of 1994. Available at <https://sso.agc.gov.sg/Acts-Supp/15-1994/Published/19950315?DocDate=19940923>

³¹ *International Herald Tribune*, The Net booms in China: But filters block politics and pornography: Filters in Beijing Shanghai, (30 October 1996) p. 16.

³² *BNA Daily Report for Executives*, European Commission Eyes Internet Regulations (17 October 1996) A4

³³ Ellickson Robert C, *Order without law: how neighbors settle disputes*. Cambridge, Massachusetts: (Harvard University Press, 1991) at 31.

The actor him/herself	Personal ethics	Self-regulation	Self
Second Party controllers (i.e. the person acted upon)	Contractual provisions	Various self-help mechanisms	PICS, RSACi, filter software
Non-hierarchically organized social forces	Social norms	Social sanctions	Code of conduct
Hierarchically organized non-governmental organizations	Organization rules	Organization sanctions	Industry self-regulation
Governments	Law	State enforcement coercive sanctions	Law

Table 1- *Regulatory framework, Adapted from Ellickson (1991)*

Kenya therefore enacted the Data Protection Act,³⁴ in November 2019 to give effect to Article 31 (c) and (d) of the Constitution of Kenya. The Act establishes the Office of the Data Protection Commissioner (hereinafter “the Office”), as an independent office,³⁵ with the following mandate: regulate the processing of personal data, ensure that the processing of personal data is guided by the principles, protect the privacy of individuals, establish legal and institutional mechanisms to protect personal data and the provision of data subject rights and remedies to prevent unlawful processing of their data.³⁶

The Computer Misuse and Cybercrimes Act,³⁷ also protects the confidentiality, integrity and availability of computer systems, programs and data, and the right to privacy. International best practice such as ISO/DIS 31700 on Consumer Protection-Privacy by design for consumer goods and services; and ISO/IEC 27001, 27002 & 27701 on Information Security, Cybersecurity and Privacy Protection,³⁸ are also be relevant to the

³⁴ No. 24 of 2019

³⁵ DPA, s.5

³⁶ DPA, s.3 & 8

³⁷ No. 5 of 2018

³⁸ ISO, Standards. Available on <https://www.iso.org/standards>

online media giants' operations and data processing. National laws empower data protection authorities to exercise oversight through conducting periodic and systemic audits, conducting timely and effective investigations and appropriate enforcement mechanisms where there is breach of data privacy. The ODPC, for instance slapped Oppo Kenya with a penalty notice on 21st December 2022 for neglecting and/or failing to comply with an enforcement notice issued on 3rd November 2022.³⁹

Globally, China fined Didi Global Inc, a ride hailing giant \$1.19 billion in 2022 for breach of the Network Security Law, Security Law, Data Security Law and Personal Information Protection Law.⁴⁰ In the same year Instagram and Meta were fined \$403 million and \$277 million for violation of the GDPR children's privacy and data protection by design and by default, respectively.⁴¹ Google Ireland was equally fined \$102 million by CNIL, for violation of the French Data Protection Act.⁴² In 2021, Amazon was fined \$886 million for breaches on the GDPR,⁴³ while WhatsApp was fined \$255 million for GDPR cross-border data violation in Ireland.⁴⁴

Self-Regulation of online media giants

Some of the emerging trends in promoting and ensuring compliance among online media giants is the adoption and promotion of self-regulation. Case on point being the strides made by Meta (Facebook) who have established an independent-self regulatory Oversight Board.⁴⁵ Besides being an independent body that users who disagree with decisions made

³⁹ ODPC, Office of the Data Protection Commissioner Issues a Penalty Notice against Oppo Kenya (31st January 2023) Available at <https://www.odpc.go.ke/office-of-the-data-protection-commissioner-issues-a-penalty-notice-against-oppo-kenya/>

⁴⁰ Reuters, Reaction to China imposing \$1.19 billion fine on Didi Global (21st July 2022) Available on <https://www.reuters.com/world/china/reaction-china-imposing-12-bln-fine-didi-global-2022-07-21/>

⁴¹ EDPB Ireland, Record fine for Instagram following EDPB intervention (EDPB, 15th September 2022) Available https://edpb.europa.eu/news/news/2022/record-fine-instagram-following-edpb-intervention_en

⁴² CNIL, Cookies: Google fined 150 million euros (CNIL, 6th January 2022) Available at <https://www.cnil.fr/en/cookies-google-fined-150-million-euros>

⁴³ BBC, Amazon hit with \$886m fine for alleged data law breach (BBC, 30th July 2021) Available at <https://www.bbc.com/news/business-58024116>

⁴⁴ BBC, WhatsApp issued second-largest GDPR fine of €225m (BBC, 2nd September 2021) Available at <https://www.bbc.com/news/technology-58422465>

⁴⁵ Meta, Oversight Board. Available at <https://about.fb.com/news/tag/oversight-board/>

by Facebook and Instagram can appeal, the Board also makes decisions and recommendations on a number of issues.⁴⁶ Some of the notable decisions that the Oversight Board has considered include advise on COVID-19 misinformation policies,⁴⁷ and the ending suspension of Trump's Facebook and Instagram accounts with new guardrails to deter repeat offences.⁴⁸ The Board equally issues quarterly and periodical reports on the state of Integrity and Transparency,⁴⁹ and Community Standards Enforcement,⁵⁰ respectively.

Other ways through which online media giants can implement self-regulation include: de-platforming and imposing bans on users who violate their terms and conditions and community standards, as was implemented by Facebook and Twitter to ban Donald Trump's accounts for sharing misleading content;⁵¹ conducting regular audits and bias remediation for high-risk applications; conducting efficient and timely investigations where complaints are lodged or terms and conditions are violated;⁵² levying of administrative and punitive fines for violation of community standards and revoking licenses to notorious offenders.

Regulatory challenges

Some of the regulatory challenges that have hindered the provision of oversight include:

⁴⁶ *ibid*

⁴⁷ Nick Clegg, Meta Asks Oversight Board to Advise on COVID-19 Misinformation Policies (Meta, 26th June 2022) Available at <https://about.fb.com/news/2022/07/oversight-board-advise-covid-19-misinformation-measures/>

⁴⁸ Nick Clegg, Ending Suspension of Trump's Accounts with New Guardrails to Deter Repeat Offenses (Meta, 25th January 2023) Available at <https://about.fb.com/news/2023/01/trump-facebook-instagram-account-suspension/>

⁴⁹ Guy Rosen, Integrity and Transparency Reports, Third Quarter 2022 (Meta, 22nd November 2022) Available at <https://about.fb.com/news/2022/11/integrity-and-transparency-reports-q3-2022/>

⁵⁰ Monika Bickert, Community Standards Enforcement Report, Second Quarter (Meta, 25th August 2022) Available at <https://about.fb.com/news/2022/08/community-standards-enforcement-report-q2-2022/>

⁵¹ Melina Delkic, Trump's banishment from Facebook and Twitter: A timeline (The New York Times, 10th May 2022) Available at <https://www.nytimes.com/2022/05/10/technology/trump-social-media-ban-timeline.html>

⁵² ACT Complaints Handling and Investigations Guidelines, 12th July 2010. Available at <https://actalliance.org/wp-content/uploads/2015/11/Complaints-and-Investigation-Guidelines-July-2010-1.pdf>

- a) *Lack of commensurate data protection laws*; it is not lost to this paper that there is indeed insufficient legislation on not only the *cross-border data transfer* in data protection, but also on Artificial Intelligence (AI) chatbots that is attributable to the vast technological innovations. Despite the inroads made by AI in a number of industries, Kenya has still not yet enacted laws to regulate AI.⁵³ Attempts have however been made to embrace technology and AI through the commissioning of Blockchain and Artificial Intelligence Taskforce in 2018.⁵⁴ The lack of adequate regulation is further derailed by *the skill gap, lack of data, connectivity and investment in research to match the online media giants*, and the robustly evolving technology.⁵⁵ Efforts to match the technological evolution has been further hackneyed by *lack of adequate tools to conduct audits and investigations*.
- b) *Lack of defined formula for imposition of fines*; the Kenyan DPA, for instance, prescribes a one-off penalty of up to Kshs. 5 million for failure to comply with an enforcement notice issued, pursuant to the Act,⁵⁶ without a formula for computing the same. This leads to data handlers challenging the same in Courts for lack of proper basis for imposition and enforcement.
- c) Efforts to develop sector-specific laws such as the DPA and KICA are also invalidated by *the users' (consumers) lack of awareness of their rights* such as right to access, to object to processing of their data, erasure (to be forgotten) and the right not to be subjected to automated decision-making by the online media giants.⁵⁷

⁵³ Timothy Samson Ayuo, We need laws on artificial intelligence (Daily Nation, 16th July 2021) Available on <https://nation.africa/kenya/blogs-opinion/blogs/we-need-laws-on-artificial-intelligence-3474704>

⁵⁴ Distributed Ledgers and Artificial Intelligence Taskforce, Emerging Digital Technologies for Kenya: Exploration and Analysis (2019).

⁵⁵ Jackline Akello and Ekai Nabenyio, Artificial Intelligence in Kenya, (Policy Brief by Paradigm Initiative, January 2022) at 8. Available at <https://paradigmhq.org/wp-content/uploads/2022/02/Artificial-Intelligence-in-Kenya-1.pdf>

⁵⁶ DPA, s. 58(3)

⁵⁷ DPA, s. 26

- d) The global clamour for internet regulation has had vast implication on human rights.⁵⁸ For instance, *the balance between regulation and the need to safeguard the freedom of expression and access to information*. For instance, while some democratic governments have made good-faith attempts to regulate big tech,⁵⁹ most totalitarian regimes, Commonwealth states included, have been cited for preventing citizens access to information through internet shutdowns, such as Netblocks.⁶⁰ Some of the instances include reports on: the restriction of Wikipedia in Pakistan over alleged “sacrilegious” content in February 2023,⁶¹ Turkey’s restriction of Twitter in the aftermath of the earthquake,⁶² and the restriction of social media and messaging apps such as WhatsApp, Instagram, Messenger and Facebook in Suriname amid cost of living protests.⁶³
- e) As opposed to traditional news media who had/have control over the content they interact with, complex algorithms that embed social users make them have minimal if not no control over posted contents as they most of the time haplessly scroll through their screens.⁶⁴ In the same vein, most online-media giants are merely conduits for user-generated material that undergoes close to no moderation compared to the traditional news and media that was subjected to editorial oversight before dissemination.⁶⁵

3.0 Way Forward

⁵⁸ Freedom on the Net 2021, The Global Drive to Control Big Tech (Freedom House, 2021) Available at https://freedomhouse.org/sites/default/files/202109/FOTN_2021_Complete_Booklet_09162021_FINAL_UPDATED.pdf

⁵⁹ *ibid*

⁶⁰ Netblocks, Mapping Internet Freedom in Real Time. Available at <https://netblocks.org/>

⁶¹ Available at <https://netblocks.org/reports/wikipedia-restricted-in-pakistan-over-alleged-sacrilegious-content-nAg35pAp>

⁶² Available at <https://netblocks.org/reports/twitter-restricted-in-turkey-in-aftermath-of-earthquake-oy9LJ9B3>

⁶³ Available at <https://netblocks.org/reports/social-media-restricted-in-suriname-amid-cost-of-living-protests-QAdPQNAI>

⁶⁴ Eva Hemmungs Wirtén & Maria Ryman, Mashing-up Culture: The Rise of User-generated Content (Proceedings from the COUNTER workshop Mashing-up Culture Uppsala University, May 13-14, 2009) Accessible at <http://uu.diva-portal.org/smash/get/diva2:221434/FULLTEXT01>)

⁶⁵ *ibid*

Susan Etlinger equally proposes a raft of measures that can improve regulatory oversight. As part of curbing the otherwise global marked acceleration of digital transformation momentum such as AI and data analytics, she proposes self-regulation, through the adoption of explainability and interpretability standards by platform technologies.⁶⁶ She further recommends audits and bias remediation for high-risk applications and the need to legislate and enforce illegal use of intelligent and platform technologies.⁶⁷ In the same breadth, as part of improving the insufficient whistle-blower legal infrastructure, Susan proposes the strengthening of the same for instances where violation of algorithmic systems or decisions.⁶⁸ The respective governments should also endorse and support self-regulation to elicit paradigm shifts.

Platforms and online media giants may also deploy internal reforms such as de-platforming, bans and content takedowns for users who flout their terms and conditions, and those who upload offensive or violence inciting content.⁶⁹ Case in point being how YouTube took down Donald Trump's violence-inciting videos and further slapped his account with a week's ban on new uploads.⁷⁰

In addition to the above, members states should also propose and implement carve-outs on provisions that accord the media giants liability protection, for instance Section 230 of the United States' Communications Decency Act of 1996.⁷¹ The online and social media giants should instead be held accountable for user-generated misinformation, disinformation, incitement to violence or publishing of illicit content.⁷²

⁶⁶ Susan Etlinger, The Next Wave of Platform Governance (14th May 2021) Accessible at <https://www.cigionline.org/articles/next-wave-platform-governance/>

⁶⁷ *ibid*

⁶⁸ *ibid*

⁶⁹ Dipayan Ghosh, Are we Entering a New Era of Social Media Regulation? (Harvard Business Review, 14th January 2021) Available at <https://hbr.org/2021/01/are-we-entering-a-new-era-of-social-media-regulation>

⁷⁰ *ibid*

⁷¹ The United States Department of Justice Archives, Department of Justice's Review of Section 230 of the Communications Decency Act of 1996. Available at <https://www.justice.gov/archives/ag/departments-justice-s-review-section-230-communications-decency-act-1996>

⁷² *ibid*

As part of striking the balance between regulation and the need to safeguard the freedom of expression and access to information, countries, online media giants and regulators, can borrow a leaf from the UNESCO draft guidelines for regulating digital platforms devised in February 2023,⁷³ to tailor their terms and conditions and regulations. The same adopt a multistakeholder approach to safeguarding freedom of expression and access to information,⁷⁴ which guidelines can be used as guidance by most, respectively. To ensure effective and efficient regulation of online media giants, there is need for international cooperation,⁷⁵ and collaboration between the respective data protection authorities for bench-marking purposes, together with mutual legal assistance in matters data mining and cross-border data transfers.

Data Protection Authorities can also be encouraged and supported to establish innovation hubs within their jurisdiction, to provide critical infrastructure on emerging areas such as AI, and also empower citizens in terms of digital literacy programmes. Lessons can be borrowed from LINC, CNIL's digital innovation hub which collates and conducts a research through reflecting on information on emerging trends in the use of digital technology and data.⁷⁶

Ensuring that online media giants adopt data protection by design and by default to ensure that their data processing is embedded on privacy and data protection principles. Online media giants should also incorporate opt-out provisions where there the online media giants use direct marketing or promotional messages, and where they engage in automated decision making, or use users' data on direct marketing and promotional messages users.⁷⁷

⁷³ UNESCO, Guidelines for regulating digital platforms, Draft 2.0 (February 2023). Available at <https://www.unesco.org/en/internet-conference/guidelines>

⁷⁴ *ibid*

⁷⁵ European Data Protection Board, International Cooperation & Cooperation with other Authorities. Available at https://edpb.europa.eu/our-work-tools/support-cooperation-and-enforcement/international-cooperation-cooperation-other_en

⁷⁶ LINC, The CNIL's Digital Innovation Lab publishes new studies on trackers and the advertising ecosystem (6th October 2020) Available at <https://www.cnil.fr/fr/node/120412>

⁷⁷ <https://ico.org.uk/for-organisations/direct-marketing/direct-marketing-and-the-public-sector/>