

# **Processing for direct marketing in the context of the trade journal, magazine and newspaper sector**

Dr. Christoph Fiedler, EMMA

17 December 2012  
European Parliament, Brussels

# Why we need print, website and apps: Increase in the reach of print brands thanks to the expansion of digital platforms

## Examples for the scale of accumulated users' circles



**The reach expansion through online platforms has increased by 15% compared to previous year.**

# Press distribution and data processing

- Magazines and newspapers need direct marketing to reach readers.
- Magazines and newspapers need direct marketing to finance journalism.
- Two areas:

Subscription marketing of the **consumer press**  
and of the **B2B press**

Controlled circulation of the **B2B press**





# Data Processing and Press distribution

## Direct Marketing of Newspapers and Magazines

- Up to 40% of **subscriber circulation of** magazines and newspapers depend on the current possibility to process personal data for the purpose of direct marketing on the basis of legitimate interest and right to object.
- Examples: A bike magazine sends letters offering subscriptions to the customers of a bike dealer. A conservative newspaper sends marketing letters to the customers of a gentlemen's outfitter.
- The bike dealer transmits personal data (addresses) to the publisher, a third party. The publisher processes these addresses for the purpose of direct marketing.

# Data Processing and Press distribution: Direct Marketing of Newspapers and Magazines

- **Why is it necessary?** Newspapers and magazines need to **compensate for a natural fluctuation of up to 30%** of subscribers per year depending on the sector and title.
- Publishers therefore must permanently **contact potentially new readers** for the purpose of selling reading.
- It is not sufficient to contact existing subscribers.
- Publishers must permanently **reach out to new readers among people who are not yet subscribers but could be interested in becoming regular readers.** Therefore they depend on third parties' address lists with potentially interested people.



# Data Processing and Press distribution: Direct Marketing of Newspapers and Magazines

- A press subscription is **a product that must be explained**, but which has no retail outlet: Direct marketing is indispensable.
- Data protection law only deals with the question of **whether and how personal data can be used for a certain purpose**. (In this case, direct marketing for the purpose of press subscriptions).
- Even where data protection law allows the processing of addresses for direct marketing, **certain communication channels are subject to additional preconditions**. Telephone marketing requires specific prior consent in many countries. Similar rules apply to e-mails.

# Data Processing and Press distribution: Direct Marketing of Newspapers and Magazines

- Addressed reader marketing on the basis of the legitimate interest pursued by the publisher - combined with the addressee's right to object - is **vital for the press**. For their reach as well as for financing journalism.
- The **benefits** of such marketing letters **for the addressees** far outweigh any perceived disadvantages. This can be demonstrated by the insignificant number of objections compared to positive responses. For example, various publications receive between 1 and 10 objections for every 100.000 letters (0,1 per mille = 0,01 per cent).



# Data Processing and Press distribution: Direct Marketing of Newspapers and Magazines

**Example: Groupe Express-Roularta** (a publishing house covering Belgium and France)

800.000 subscribers to the various titles of the group

- Each year 310.000 new subscribers have to be found
- 42 % of new subscribers come from direct mailings

# Data Processing and Press distribution: Direct Marketing of Newspapers and Magazines



**L'Express**, weekly, Groupe Express-Roularta

320.000 subscribers

to maintain this subscription circulation:  
110.000 new subscribers per year have to be found

85.000 of these subscribers come from  
direct mailings



**Prospect**, monthly, Prospect Publishing

25 % new subscribers each year have to be  
found

60 % of the subscription circulation depend on  
direct mailings

# Data Processing and Press distribution: Direct Marketing of Newspapers and Magazines



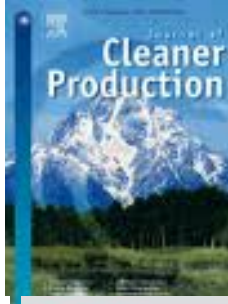
## German regional and local newspapers

Approximately 20 % of the subscription circulation depend on direct mailings

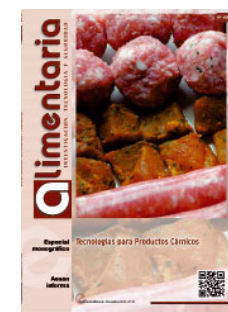
## Data Processing and Press distribution: Direct Marketing of Newspapers and Magazines

- **Belgium:** up to 46% of newspaper and magazine subscriptions
- **France:** up to 42% for newspaper and magazine subscriptions
- **Germany:** up to 20% for newspaper and magazine subscriptions
- **Sweden:** up to 46% for newspaper and magazine subscriptions
- **UK:** up to 45% for magazines subscriptions





# B2B Press





# Data Processing and Press distribution

## Direct marketing and B2B press

- B2B magazines ('trade journals', 'business press') exist for almost any given profession. They are aimed at people working in **specific industries, services or crafts**. They are financed by either advertising or subscriptions, or by both.
- B2B magazines widely depend on **controlled circulation**. This kind of distribution of the B2B press exists already for over 110 years. It means that up to 100% of the copies are sent to qualifying individuals based on specific address lists.
- Controlled-circulation ensures that the relevant experts in the field can be reached. Only if such a relevant reach can be demonstrated will advertisers place advertisements in the magazine.

# Data Processing and Press distribution

## Direct marketing and B2B press

- The addresses are processed on the basis of a legitimate interest with the right to object. Such address lists are transmitted to the publisher e.g., by enterprises or organisers of trade fairs. Another source is publicly available data like registers, internet etc.
- B2B magazines play an **important role in the knowledge based economy** as the information contributes to the continuing professional development of their readers.
- Again, the advantages outweigh the disadvantages. Only very few recipients object to receiving further editions while millions of professionals appreciate the information.



**Industrie (Industry)**, monthly, French + Flemish, Roularta Media Group

23.789 copies

- 23.481 controlled circulation
- 308 sold by subscription



**Data News**, weekly, French + Flemish, Roularta Media Group

18.259 copies

- 15.601 controlled circulation (85,44 %)
- 2.658 sold by subscription (14,56 %)



**Automobil Industrie (Car Industry)**, 10 issues per year, German, Vogel Business Media

9.736 copies

- 8.657 controlled circulation (89 %)
- 1.079 sold by subscription (11 %)



**Perspektive Prozessindustrie (Perspective Process Industry)**, 9 issues per year, German, Publish Industry Verlag

16.468 copies

- ca. 14.000 controlled circulation (ca. 85 %)
- ca. 2.260 sold (ca. 13 %)



## De Apotheker/Le Pharmacien (The Pharmacist), bi-monthly, French + Flemish, Roularta Media Group

8.663 copies

➤ 100 % controlled circulation



## De tandarts/Le Dentiste (The Dentist), bi-monthly, French + Flemish, Roularta Media Group

8.303 copies

➤ 100 % controlled circulation





## Maschinenmarkt (Machine Market), weekly, German, Vogel Business Media

44.133 copies

- 39.328 controlled circulation (89 %)
- 4.805 sold by subscription (11 %)



## A & D Vorsprung Automation (Advance Automation), 10 issues/per year, German, Publish Industry Verlag

19.448 copies

- ca. 17.000 controlled circulation (ca. 87 %)
- 2.450 sold (13 %)



## Lebensmittelzeitung (Food magazine), weekly, German, Deutscher Fachverlag

40.670 copies

- ca. 14.800 controlled circulation (ca. 36%)
- ca. 24.379 sold by subscription (ca. 60 %)



## Mappe – Die Malerzeitschrift (The Painter Magazine), monthly, German, Callwey Verlag

18.026 copies

- ca. 13.305 controlled circulation (ca. 74 %)
- ca. 4.030 sold by subscription (ca. 22 %)

# Press distribution, data processing and direct marketing - Main concerns of the European Press

- **Preserve the current approach:** Direct marketing on the basis of legitimate interest and right to object is vital for the B2B press as well as for newspapers and magazine media.
- **This includes the availability of address lists** from different sources. Therefore data controllers must keep the right to transmit addresses to publishers in the publisher's (third party) legitimate interest.
- **Information requirements must be proportionate** and should not be too burdensome.

# Press distribution is only one part of press freedom which depends on data processing

1. **Digital business models** must not be jeopardised
  - **Digital business models like OBA or e-commerce are indispensable** for the press. The press is technology neutral: Print, Website, Apps
  - **Data protection requirements must be proportionate** and not jeopardise existing and future digital business models
  - **Increasing disadvantages for EU SMEs** compared to major global players **must be avoided**. Websites without login must not be disadvantaged in comparison to login-businesses like social networks, e-mail-providers etc.
2. **The exemption for data processing for journalistic purposes** has to be robust and directly applicable

**Thank you  
for your attention!**