

As biometric technologies – like facial recognition and voice analysis – emerge in digital advertising, they offer new ways to personalize experiences. Many IAB Canada members are experimenting with this new technology to offer everything from enhanced user experiences to safety measures online. However, the OPC has raised some concerns about its use. The recent guidelines, which can be read [here](#), provide helpful direction for the industry to consider:

Is Biometric Data Sensitive?

Treat it as sensitive if:

- It can identify someone when combined with other data.
- Misuse could cause significant harm (e.g., fraud, profiling).
- It reveals other sensitive info (e.g., health status).

Before You Launch a Biometric Program

Even with consent, per the OPC, biometric use must be justified. Ask:

- **Is there a legitimate business need?**
Don't collect data for vague or future use.
- **Is it effective?**
Ensure accuracy and assess risks of misuse or failure.
- **Is it minimally intrusive?**
Avoid using biometrics just for convenience.
- **Is it proportionate?**
Balance privacy risks with business benefits.

The OPC generally advises caution: If unsure, don't proceed.

Consent and Data Limits

- Get **clear, specific consent** – it is best not to rely just on general notices.
- Offer alternatives if biometrics are not essential.
- Collect only what's needed; prefer verification over identification.

- Avoid centralized databases; keep data under user control.
- Use data only for stated purposes, no secondary use without consent.

Safeguards and Accountability

- Use privacy-by-design systems with encryption and access controls.
- Test accuracy; don't rely solely on vendor claims.
- Monitor access, train staff, and maintain audit trails.
- Comply with PIPEDA, publish a clear privacy policy, and explain any automated decisions.
- Include audit rights in vendor contracts and prepare a breach response plan.

The OPC has raised concerns about the use of biometric data, and released guidelines for what it feels are appropriate. IAB Canada members have shown an interest in using it to better personalize the digital advertising landscape – acting in compliance with the guidelines ensures continued use without interruption or concern over regulatory misalignment.

If you would like to learn more about biometrics in digital advertising, please check out our article [here](#).

If you would like to discuss this further or any other topics, please reach out to us at policy@iabcanada.com.