

## Joint Association letter on DMA

We, undersigned organisations, would like to thank policymakers for the effort and work that has been put into Digital Markets Act negotiations so far. We are appreciative of the proposals aimed at making the DMA workable and avoiding the unintended consequences of the DMA for SMEs. Nevertheless, with the negotiations nearing the end, we believe it is important to fine-tune provisions aimed at targeted advertising to avoid negative impacts for European businesses.

We support all initiatives aimed at improving the position of European businesses and users. That is why we are in favour of proposals to increase the transparency of targeted advertising. At the same time, we recognize the value that targeted advertising brings to SMEs and NGO, which, in contrast to large players, do not have multi-million marketing budgets, as well as the value that targeted advertising brings to users, who can access ad-supported online services for free. This value has been confirmed by various studies, including a [survey](#) by Ipsos showing that 69 per cent of surveyed users prefer to see ads over paying for content online, and a further 68 per cent agree that targeted advertising is beneficial for small businesses.

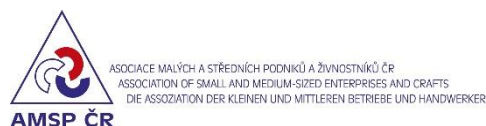
Hence, in our view, the implementation of the obligations by the gatekeepers should not affect the quality, functionality and integrity of the services that small businesses currently benefit from. It is, therefore, crucial to ensure that DMA avoids unnecessary restrictions that would undermine the value of targeted advertising for European businesses.

Unfortunately, the European Parliament's proposals do not seem to go in that direction. The EP has proposed to introduce an opt-in based on GDPR consent for both the combination and the "cross-use" of personal data for targeted advertising. This goes beyond what was proposed by the European Commission in the original version of Article 5(a), which required users' consent for the combination of personal data only. The extension to the "cross-use" of such data is disproportionate and will seriously decrease the functionality of targeted advertising, thereby harming the needs of the many entrepreneurs for whom targeted advertising is the most cost-effective way to acquire customers. The introduction of an opt-in for targeted advertising is also a departure from established practice under GDPR. This change has been criticized by data protection experts, including the [Centre for Information Policy Leadership](#), which has "strongly recommended" to align the DMA with the GDPR due to the fear of creating conflicting regulations. Ultimately, an opt-in does not respond to more substantive concerns regarding the transparency of targeted advertising, which are better addressed through other means.

To conclude, while we support the objectives of the DMA, we believe that DMA does not strike the right balance between value creation and the protection of users. Since European SMEs often cannot afford advertising in mass media, an opt-in for targeted advertising will inevitably weaken their position vis-à-vis large companies, making the DMA miss its point.

---

Dr. Ing. Josef Jaroš, MBA  
Chairman of the Board of Directors  
Association of Small and Medium-Sized  
Enterprises and Crafts  
CZECH REPUBLIC



---

Hrvoje Bujas  
President of Voice of Entrepreneurs  
CROATIA



---

Stella MORABITO  
Director General  
AFNUM  
FRANCE



---

Peter Kofler  
Chairman of the Danish Entrepreneur  
Association  
DENMARK



---

Giuseppe de Martino  
President  
Association des Services Internet  
Communautaires  
FRANCE



---

Virgilijus Dirma,  
Head of European Union and International  
Relations of Infobalt  
LITHUANIA



---

Elena Leontjeva  
President of Lithuanian Free Market Institute  
LITHUANIA



---

Cezary Kaźmierczak  
President of the Union of Entrepreneurs and  
Employers  
POLAND



---

Michal Kardoš  
Executive Director of SAPIE  
SLOVAKIA



---

Olivier Marquette  
President of American Chamber of Commerce  
in Bulgaria  
BULGARIA



---

Marcin Nowacki  
President of European Enterprise Alliance  
CEE



---

Doris Põld  
CEO Estonian Association of Information  
Technology and Telecommunications  
ESTONIA



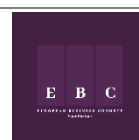
---

Gábor Mátrai  
Board member  
Association of Information Technology,  
Telecommunications and Electronics  
Enterprises  
HUNGARY



---

Krisztina Orosz  
Chair of the European Business Connect  
HUNGARY



---

Cristina Angelillo  
President of InnovUp  
ITALY



---

Eleonora Faina  
Director General  
Anitec-Assnform  
ITALY



---

Lotte de Bruijn  
Managing Director at NLdigital  
THE NETHERLANDS



---

Carlos Mateo  
President of Spain Startups Association  
SPAIN



---

Michał Kanownik  
CEO of Digital Poland  
POLAND



---

Marta Pawlak  
Head of Public Policy at Startup Poland  
POLAND



---

Jerzy Minorczyk  
General Director  
International Advertising Association  
POLAND



---

Morgane Taylor  
General Manager at Europe ACT | The App  
Association



---

Konrad Shek  
Director  
Advertising Information Group



---

Benedikt Blomeyer  
Director EU Policy  
Allied for Startups



---

Benjamin Mueller  
Senior Policy Analyst  
Center for Data Innovation



---

Javier Fiz Perez  
Vicepresident of Core Values



---

Christian Borggreen  
Vice President & Head of Office at Computer &  
Communications Industry Association Europe



Computer & Communications  
Industry Association  
Tech Advocacy Since 1972

---

Karina Stan  
Director of EU policy & Head of Brussels Office  
of Developers Alliance



---

Vinous Ali  
Coordinator for Digital Future for Europe



---

Dr. Ingo Friedrich  
President of European Economic Senate



European Economic Senate  
Economic competence for Europe

---

Luca Cassetti  
Secretary General of Ecommerce Europe



---

Géraldine Proust,  
Director of Public Affairs of Federation of  
European Data and Marketing (FEDMA)



---

Guido Lobrano  
Vice President and Director General for Europe  
of Information Technology Industry Council (ITI)



---

Glen Hodgson  
CEO of Free Trade Europa



---

Michael Jaeger  
Secretary General Taxpayers Association of  
Europe



---

Johann Svane  
Head of Policy of Targeting Startups

TARGETING**STARTUPS**

---

Individual supporters:

Matthias Bauer