

Microsoft Consumer Profiling Report – Annex 2 – LinkedIn

**DMA.100160 – Microsoft; DMA.100026 – Microsoft – Operating Systems;
DMA.100017 – Microsoft – Online Social Networking Services**

1. PRELIMINARY INFORMATION

1.1. Glossary

1. This document uses the following terms:

Automated Decision-Making: automated decision-making means the automated decision-making, including Profiling, referred to in Article 22(1) and (4) of the GDPR.¹

Business User: business user as defined in Article 2, point (21), of the DMA.²

Consent: consent of the data subject as defined in Article 4, point (11) of the GDPR.

Consumer Profiling Technique: any technique for Profiling consumers as understood under Article 15 of the DMA.

Customer: a Business User of LinkedIn’s products or services provided as part of or together with LinkedIn’s online social networking service, including Sales Navigator, Recruiter, LinkedIn Jobs (“**Jobs**”), LinkedIn Marketing Solutions (“**LMS**”), and LinkedIn Learning (“**Learning**”).

Downstream Use Cases: model-based downstream use cases of Consumer Profiling Technique outputs.

End User: end user as defined in Article 2, point (20), of the DMA.

Feed: a regularly updating stream of content that appears on a Member’s home page. The feed contains information relevant to a Member such as posts, shares, comments, and reactions from the Member’s network.

LinkedIn CPS: LinkedIn CPS refers to LinkedIn’s online social networking service designated as a core platform service (“**CPS**”) under the DMA on 5 September 2023.³ The

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation or “**GDPR**”).

² Regulation (EU) 2022/1925 of the European Parliament and of the Council on contestable and fair markets in the digital sector (Digital Markets Act or “**DMA**”).

³ European Commission Decision of 5 September 2023 designating Microsoft as a gatekeeper pursuant to Article 3 of Regulation (EU) 2022/1925 of the European Parliament and of the Council on contestable and

LinkedIn CPS encompasses LinkedIn’s flagship online social networking service, including its Games and Video features, as well as certain enhanced search and contact capabilities offered to sales and recruiting professionals through LinkedIn Sales Navigator and Recruiter. LinkedIn provides other services that are distinct from but provided together with, not separately from, the LinkedIn CPS. Namely, LinkedIn’s LMS, Jobs, and Learning services.

Member: a user of LinkedIn’s social network who has a registered account and profile on the platform. Members use LinkedIn to connect and communicate with other professionals, explore opportunities for employment, and discover content for career and business development opportunities.

Pages: pages created on LinkedIn’s social network by organizations, including companies, universities, or non-profit organizations, to allow Members to discover, follow, and connect with those organizations and learn more about their products and services.

Personal Data: personal data as defined in Article 4, point (1) of the GDPR, in particular information relating to an identified or identifiable natural person.

Premium: subscription-based service that provides Members with access to a variety of enhanced features that empower Members to achieve their professional goals faster. Examples of enhanced features include additional insights about profile views or the ability to conduct unlimited searches for other professionals across LinkedIn.

Profiling: profiling as defined in Article 4, point (4), of the GDPR and as clarified in WP29, “Guidelines on Automated individual decision-making and Profiling for the purposes of Regulation 2016/679,” 17/EN WP251 rev.01, 6 February 2018. For purposes of this Report, data processing is considered to constitute Profiling if: (1) the processing is automated; (2) the processing is carried out on Personal Data; and (3) the objective of the processing is to evaluate personal aspects about a natural person, in particular to analyze or make predictions about them.

Third Party: third party means a natural or legal person, public authority, agency, or body other than Microsoft.

1.2. Overview

2. Before detailing LinkedIn’s specific Consumer Profiling Techniques and to orient the reader with LinkedIn’s offerings, LinkedIn provides a brief overview of its products and services and the data processed in delivering said offerings. LinkedIn’s description of its Consumer Profiling Techniques begins in **Section 2**.

fair markets in the digital sector, DMA.100017 Microsoft – online social networking services, DMA.100023 Microsoft – number-independent interpersonal communications services, DMA.100026 Microsoft – operating systems (“Designation Decision”), ¶157.

1.2.1. Products And Services Offered

3. LinkedIn, through the LinkedIn CPS, provides an Internet-based social networking service that focuses on promoting professional connections. LinkedIn Members use the LinkedIn CPS to engage, search, discover, connect, and communicate with other professionals, including through its Games and Video features. Members also use the LinkedIn CPS to advance opportunities for employment and explore content for career and business development prospects via the LinkedIn Feed, recommendations (for potential connections and content), LinkedIn Pages, and messages or chats. LinkedIn Members can purchase LinkedIn Premium subscriptions that offer enhanced sets of features for engaging with the LinkedIn social network.
4. LinkedIn offers certain enhanced search and contact capabilities for sales and recruiting professionals as part of the LinkedIn CPS. LinkedIn Sales Navigator is a sales intelligence tool that complements Customer Relationship Management (“CRM”) offerings (such as Salesforce CRM) to provide Customer lead recommendations, sales updates, and search results for Member database queries. Similarly, LinkedIn Recruiter offers recruiting teams additional search and project management tools.
5. LinkedIn provides other jobs, marketing, and learning products and services together with the LinkedIn CPS. With LinkedIn Jobs, employers and recruiters may post jobs, and candidates may find and apply for jobs. LMS allows Customers to advertise to LinkedIn Members, including through native advertising (Sponsored Updates), messages (Sponsored InMails), text ads, and dynamic banner ads. LinkedIn Learning offers online educational courses and programs for teams and individuals to build new skills.

1.2.2. What Member Personal Data Are Collected To Provide Products And Services

6. LinkedIn’s mission is to connect the world’s professionals to allow them to be more productive and successful. Central to this mission is LinkedIn’s commitment to its Members to be transparent about the data LinkedIn collects, how this data is used, and with whom this data is shared. These topics are covered in detail in both LinkedIn’s global Privacy Policy and its European Regional Privacy Notice.⁴
7. LinkedIn collects Member Personal Data from several sources to offer its products and services, including data (i) provided by Members themselves and (ii) generated through Member use of LinkedIn’s products and services.
8. **Data provided by Members.** Members provide data to LinkedIn through LinkedIn’s account registration process, including a Member’s name, email address, mobile number, and account password. Members may additionally provide information when filling in or updating their profiles, such as information about their education, work experience, skills, or endorsements. Members may also provide data when posting to the Feed or uploading

⁴ See [LinkedIn Privacy Policy](#) and [European Regional Privacy Notice](#). Further details on LinkedIn’s relevant transparency measures are set out in **Section 2.12** of this Report.

content to LinkedIn, including when a Member fills out a form, responds to a survey, submits a resume, or fills out a job application.

9. **Data generated by Member product or service use.** LinkedIn collects Member product and service usage data when Members visit or otherwise use LinkedIn services, including its sites, app and platform technology, such as when Members view or click on content (e.g., learning video) or ads usage and activity data from Members who are Customer seat holders of Jobs, LMS, and Learning. In addition, LinkedIn may use login credentials, cookies (and similar technologies), or device information to identify Members.

1.2.3. How Member Personal Data Is Used To Provide Products And Services

10. As explained below, LinkedIn uses Member Personal Data to help Members connect, stay informed, explore their career opportunities, and be more productive. How LinkedIn uses Member Personal Data will depend on which services or products the Member uses, how Members use those services or products, and the choices Members make in their settings.
11. LinkedIn uses Member Personal Data to provide and personalize its services, including with the help of automated systems and inferences it makes, so that LinkedIn services (including ads) can be more relevant and useful to Members. In general, LinkedIn uses Member Personal Data to help Members connect with others, stay informed, find and be found for work and business opportunities, get training and be more productive, and receive relevant ads, and marketing of LinkedIn products and services, that Members may be interested in.

1.3. Differences Compared To Previously Submitted Consumer Profiling Report

12. LinkedIn describes in this section the differences in this version of its Consumer Profiling Report compared to the version it submitted last year.
13. LinkedIn has not changed the Consumer Profiling Techniques identified in its previously submitted Consumer Profiling Report. LinkedIn has made certain changes to the descriptions of its Consumer Profiling Techniques detailed in **Section 2.1** to either clarify or reflect new data processing practices.
14. In **Section 2.6**, LinkedIn describes how it is in the process of changing its legal basis for processing Personal Data under the GDPR for certain uses of Consumer Profiling Techniques, which includes the introduction of new GDPR Consents. LinkedIn provides detailed information on its new GDPR Consents in **Section 2.8**.
15. LinkedIn has provided details in **Section 2.7** about whether its Consumer Profiling Techniques process Personal Data in a manner that requires Member Consent under DMA Article 5(2). LinkedIn has also included information in **Section 2.8** on how its DMA consents are presented to Members, what those consents say, and how LinkedIn respects its Members' choices when they withhold or withdraw Consent.
16. In **Section 2.10**, LinkedIn mapped additional Consumer Profiling Techniques to certain of its Downstream Use Cases and added descriptions of new Downstream Use Cases,

specifically: (i) Product Interfaces for Advertising Segments and (ii) the Job Seeker Coach feature as part of Recommending Jobs-Related Actions or Insights.

17. In **Section 2.11**, LinkedIn updated the number of End Users exposed to the Consumer Profiling Techniques, and Business Users of the LinkedIn CPS and LMS, for the most recent fiscal year available.
18. In **Section 2.12**, LinkedIn added a reference to LinkedIn's European Regional Privacy Notice as an additional area of transparency regarding its Consumer Profiling Techniques. LinkedIn also added references to additional Help Center articles which disclose helpful information to Members about LinkedIn's Consumer Profiling Techniques.
19. LinkedIn has made certain other non-material updates throughout its Report including, for example, definitional changes and clarifications relating to certain words or statements.

2. INFORMATION ABOUT CONSUMER PROFILING TECHNIQUES

20. Below, LinkedIn describes its Consumer Profiling Techniques, as required by Article 15 of the DMA. The following description and information provided is valid as of 31 December 2024.

2.1. Specific Purposes Pursued By Profiling Techniques

a) the specific purpose(s) pursued by each profiling technique(s);

21. Broadly speaking, LinkedIn uses Consumer Profiling Techniques for four main purposes: (i) personalize Members' experience on the LinkedIn platform by understanding their goals and interests; (ii) deliver relevant advertising to Members; (iii) provide features to Customers in LinkedIn subscription services; and (iv) promote LinkedIn subscription services to Members. To expand on what these purposes mean in practice:
22. **Personalizing Members' experience on LinkedIn.** LinkedIn strives to help each Member get the most out of the time they spend on the LinkedIn CPS by seeking to show the most relevant content and make relevant recommendations, whether that means showing professionally-relevant content in the Feed, surfacing jobs, people, organizations or groups that a Member might be interested in, or suggesting actions that a Member may wish to take to advance their professional opportunities. In this way, Consumer Profiling Techniques relating to Member interests, goals, career status, skills, activity, and more, are used with the goal of advancing LinkedIn's mission (*i.e.*, to connect the world's professionals to make them more productive and successful) and its vision (*i.e.*, to create economic opportunity for every Member of the global workforce). Specific Consumer Profiling Techniques used for this purpose (as defined and described below) are: Inferring Personal Characteristics about Members, Inferring Member Career and Activity Related Attributes, Inferring Member Skills, Inferring Member Interests, Knowledgeable Members to Ask, and Expert Contributors.
23. **Providing relevant advertising to LinkedIn Members.** Together with the LinkedIn CPS, LinkedIn offers a B2B-focused online advertising service (LMS) that seeks to deliver

relevant ads to relevant audiences of Members, for the benefit of both LinkedIn’s Members and its LMS Customers. To help ensure that Members engage with relevant advertising, LinkedIn organizes segments and other advertising audience criteria, some of which leverage Consumer Profiling Techniques described below, including, but not limited to, Advertising Segments, Inferring Personal Characteristics About Members, Inferring Member Skills, and Inferring Member Interests.

24. **Providing features in LinkedIn subscription services.** LinkedIn provides subscription-based services that offer additional tools and insights, including enhanced search and project management tools. Among the features provided in LinkedIn’s subscription services are search and recommendation modules that leverage Consumer Profiling Techniques to help subscribers identify relevant LinkedIn Members (such as a relevant potential candidate for a Member using LinkedIn’s Recruiter subscription services), or to evaluate subscriber seat-holder platform activity to help Sales Navigator Customers get the most of their subscriptions. Consumer Profiling Techniques used for this purpose (described below) include, but are not limited to, Potentially Active Job Seekers, Talent, or Hirers; Potential Customers for Products or Services; and Social Selling Index.
25. **Promoting subscription services to Members.** LinkedIn seeks to promote the most relevant Premium subscription services (such as subscriptions with tools and insights geared toward job seekers, or to business leaders, or to those focused on learning opportunities) to Member audiences. To ensure relevant promotions, LinkedIn organizes Member audiences based on Member intents, including the use of the Potential Interest in LinkedIn Premium Subscriptions Consumer Profiling Technique, described below.

Table 1. Consumer Profiling Techniques

Technique	Use Description & Purpose
Inferring Personal Characteristics About Members	<p>LinkedIn creates inferences about its Members that are used to personalize a Member’s experience on LinkedIn and provide recommended content, jobs, and ads on LinkedIn.</p> <p>Here, the Consumer Profiling Technique is the method by which LinkedIn uses Member Personal Data, including Member profile data and LinkedIn activity data, to draw conclusions about a Member’s personal characteristics on LinkedIn.</p> <p>For example, based on profile data, LinkedIn may infer the likely age, gender, or spoken language preference of a Member.</p>
Inferring Member Career and Activity Related Attributes	<p>As noted above, LinkedIn creates inferences about its Members that are used to personalize their experience on LinkedIn and provide recommended content, jobs, and ads on LinkedIn.</p> <p>Here, the Consumer Profiling Technique is the method by which LinkedIn uses Member profile data and Member activity data to draw conclusions</p>

Technique	Use Description & Purpose
	<p>about a Member’s career intentions, potential interactions with various facets of the LinkedIn CPS, and similarities between Members.</p> <p>For example, based on Member profile data and Member activity on the platform, LinkedIn may infer that a Member may be a people manager. Likewise, based on Member activity, LinkedIn may infer that a Member would be likely to watch video content on LinkedIn’s Feed.</p>
<p>Inferring Member Skills</p>	<p>As part of LinkedIn’s “skills-first” approach to the labor market, understanding and correctly interpreting a Member’s relevant skills is key to recommending relevant content, job opportunities and ads to Members. In addition to the skills Members explicitly add to the skills section of their profiles, LinkedIn derives inferred and implicit skills to serve this skills-first approach.</p> <p>These inferred and implicit skills are derived from information in the Member’s profile.</p> <p>Implicit skills are skills extracted from a Member’s profile text (<i>e.g.</i>, a Member’s profile summary, title, or profile headline). For example, if a Member writes on their profile, “I have 20 years of experience with legal research,” LinkedIn may derive that they have the implicit skill “Legal Research.” Inferred skills are skills that are not directly mentioned in the “Skills” segment of a Member’s profile but can be derived based on information provided in a Member’s profile and common skills found in similar Member’s profiles (<i>i.e.</i>, Members with similar titles, seniority and industry).</p> <p>These implicit and inferred skills are not displayed to others in a Member’s profile unless the Member takes action to add them (<i>i.e.</i>, LinkedIn does not edit Member profiles); instead, inferred and implicit skills are stored as inferences which LinkedIn then uses to surface recommendations to the Member (which the Member can see and act on in their profile), and to suggest to other Members or recruiters that the Member may have that skill. Skills derived from Member-provided information may also be used for advertising purposes.</p>

Technique	Use Description & Purpose
<p>Inferring Member Interests</p>	<p>Member interests are a subset of inferences that LinkedIn makes about its Members, based on their activity on the LinkedIn CPS.</p> <p>LinkedIn’s Interest Graph maps relationships between Members and a standardized set of interests. Here, the Consumer Profiling Technique is the method by which Interest Graph derives Member-interest affinity scoring, including, for example, assessing the content of posts viewed, duration of view, or whether a Member expanded a post to see more of it.</p> <p>For example, the Interest Graph may infer that a Member has an interest in Electric Vehicles or in Intellectual Property. Such inferred interests can then be used by LinkedIn’s Feed relevancy models to show the Member relevant content.</p>
<p>Knowledgeable Members to Ask</p>	<p>On LinkedIn product Pages, LinkedIn may recommend “Helpful People,” that is, other Members in the page-viewing Member’s network who are skilled in the product or work at a company or in a role that uses the product.</p> <p>Here, the Consumer Profiling Technique is the process of identifying “Helpful People,” or knowledgeable Members to ask about a given product, based on a Member’s profile data, including their work experience, and skills. To identify what products a company may use, LinkedIn uses data such as survey responses collected from Members who work at that company, as well as skills data from Members who work at that company. LinkedIn uses this data to list Members who may have knowledge about a specific product so that the viewing Member can ask them about their experience or knowledge.</p>
<p>Expert Contributors</p>	<p>Expert Contributors are Members that may be highly knowledgeable or experienced in a certain topic or field, who LinkedIn might invite to contribute to collaborative articles on LinkedIn. Here, the Consumer Profiling Technique is the method of designating a Member as a potential “expert.”</p> <p>To designate someone as a potential “expert,” the model evaluates explicit skills, which are skills listed in a Member’s profile, how active the Member is on LinkedIn, and skill proficiency. This evaluation may result in a designation that the Member may be an “expert” in a given field or skill.</p>

Technique	Use Description & Purpose
Advertising Segments	<p>LinkedIn enables LMS Customers to direct advertising campaigns to relevant audiences among LinkedIn’s Members. LinkedIn infers certain characteristics of Members based on their profile and account data and their activity on LinkedIn. LinkedIn calls these segments “interests and traits.” For example, based on a Member’s LinkedIn profile attributes and content engagement activity data patterns, a Member may be placed in the “business traveler” segment, indicating that the Member is likely a business traveler. Here, the Consumer Profiling Technique is the method by which LinkedIn draws inferences to place Members into such advertising segments.</p>
Potentially Active Job Seekers, Talent, or Hirers	<p>LinkedIn calculates a score to classify how active a Member is in their job search, which is used to personalize the Member’s LinkedIn experience and to identify potentially urgent and highly active job seekers to recruiters in Recruiter. Here, the Consumer Profiling Technique is the method by which LinkedIn creates a Member’s Job Seeker Score. To make this determination, LinkedIn evaluates data relevant to a Members’ job seeking, including the level of activity a Member has within the Jobs service (<i>e.g.</i>, number of jobs viewed, clicked on and applied to in the past week), LinkedIn activity data (<i>e.g.</i>, the number of new connections made), as well as whether the Member has activated their “Open to Work” banner in their profile.</p> <p>LinkedIn also calculates how active a Member may be in their job search by inferring how likely they are to engage with job posts or recruiters on LinkedIn.</p> <p>Based off Member profile data and LinkedIn activity data, LinkedIn infers how likely a Member is to engage with (<i>e.g.</i>, click, save, apply) a specific job post. Here, the Consumer Profiling Technique is the method by which LinkedIn infers a Member’s probability of interacting with a specific job post. Additionally, Active Talent Spotlight is a filter which identifies candidates among Recruiter search results who are “active talent,” meaning they are potentially more likely to respond and engage with recruiters on LinkedIn. The Active Talent Spotlight appears in two interfaces: (1) LinkedIn Recruiter, which is a paid product for talent professionals (<i>e.g.</i>, recruiters) to help source, engage with, and manage candidates for jobs at their company, and (2) applicant management, which is a feature for enterprise Customers of LinkedIn’s Jobs product that displays candidates who have applied to jobs, if the job is set to collect applications on LinkedIn. Here, the Consumer Profiling Technique is the method by which LinkedIn determines how likely a Member is to be active talent. LinkedIn uses Member activity data and Member profile data to make a determination as to how likely a Member is to be active talent, including whether a Member updated certain fields of their LinkedIn profile within the last three months, whether a Member chose to share resume data with recruiters, and whether a Member works at an organization with recent layoffs.</p> <p>LinkedIn also assesses whether a Member is a Potentially Active Hirer on the platform, (<i>i.e.</i>, whether a Member is actively hiring on a given day). The</p>

Technique	Use Description & Purpose
	<p>Consumer Profiling Technique to determine whether a Member is a Potentially Active Hirer uses a model that evaluates Member behavior relating to hiring, such as posting jobs on LinkedIn’s Feed, engaging with Pages in LinkedIn’s job posting experience, or adding the “hiring” badge to the Member’s profile photo.</p>
<p>Potential Customers for Products or Services</p>	<p>Sales Navigator is a social selling tool that allows sales professionals to identify and connect with potential customers, which may include potential Customers for LinkedIn’s products and services. Within Sales Navigator, LinkedIn seeks to highlight potential customers or leads. Here, the Consumer Profiling Technique is how LinkedIn identifies potential customers or leads, based on inputs provided by the Member (Member profile data), or data collected through the Member’s use of the LinkedIn platform (Member activity data).</p> <p>Data inputs include signals such as a Member’s profile data and level of activity responding to InMail messages concerning a particular category of products or services.</p>
<p>Social Selling Index (SSI)</p>	<p>As noted above, Sales Navigator is a social selling tool that allows sales professionals to identify and connect with potential customers on LinkedIn. To help Members (who may use Sales Navigator in the course of their job) get the most from their use of LinkedIn services, LinkedIn evaluates the Member’s “social selling” activity, a score that is based on their level of activity on the LinkedIn platform. Here, the Consumer Profiling Technique is the method of calculating a Member’s Social Selling Index Score. LinkedIn processes Member profile data and Member activity data, and connections data on LinkedIn, to evaluate a Member’s establishment of their professional brand, ability to find the right people to connect with, engagement with insights, and ability to build relationships, which is reflected in a Member’s Social Selling Index Score.</p>
<p>Potential Interest in LinkedIn Premium Subscriptions</p>	<p>LinkedIn uses Member Personal Data (Member profile data), and data collected through the Member’s use of the LinkedIn platform (Member activity data) to understand and predict if a Member is likely to be interested in purchasing a LinkedIn Premium subscription. Here, the Consumer Profiling Technique is the method of determining if a Member may be interested in purchasing a LinkedIn subscription. LinkedIn may use this determination, for example, to serve a LinkedIn Member who does not have a Premium subscription with a promotional offer to upgrade.</p>

Source: LinkedIn

2.2. Categories Of Personal Data And Data Derived From User Activity

b) a description of each category of personal data and data derived from user activity (in particular, distinguish data and personal data categories actively provided by consumers⁵ from observed data⁶) and sources (e.g., first or third party service) for each of these categories of data and a description of personal data processed for profiling consumers applied to or across the designated core platform services (in particular, distinguish data and personal data originating from each of the gatekeeper’s services);

26. The below table is a list of the categories of Personal Data and data derived from Member activity processed by the Consumer Profiling Techniques listed above.

Table 2. Categories Of Personal Data And Data Derived From User Activity

Category	Provided / Observed	Data Source
<p>Member Profile Data: information provided by a Member on their LinkedIn profile, including:</p> <ul style="list-style-type: none"> • Name • Profile Photo <ul style="list-style-type: none"> ○ Optional Banners: A Member can choose one of two banners to decorate their profile photo, to either signal that they’re actively hiring (Hiring) or that they’re actively seeking new job opportunities on LinkedIn (Open to Work). • Geographic Location: A Member inputs their professional profile location by selecting a country/region and depending on that selection, the Member will be given the option to add city/district and/or postal code. • Job Seeker Intent: A LinkedIn Member can indicate their job seeker intent during their “onboarding” experience, when they first sign up to LinkedIn. • Headline: A Member can add their professional headline 	<p>Provided</p>	<p>LinkedIn Online Social Networking Service</p>

⁵ For example, profile information (e.g., age, sex, location, and other) provided by consumers through any core platform service, or provided through any other service of gatekeeper, when this data is combined or cross-used with that of a core platform service.

⁶ Observed data are understood as data provided by the consumer by virtue of using a service or device. For example, data related to, or derived from, the activity of the consumer on the gatekeeper’s core platform services or other services (e.g., the content that a user has consulted, shared, or liked) as well as data related to, or derived from, the use of devices on which the gatekeepers’ core platform services or services are provided (e.g., GPS location).

Category	Provided / Observed	Data Source
<p>as text (up to 220 characters) below their name in the introduction section on their LinkedIn profile.</p> <ul style="list-style-type: none"> • About Section: A Member can provide a summary of their professional identity in up to 2,600 characters. • Experience: A Member can input their work experience including current and previous employers, dates of employment, job titles, job responsibilities, and accomplishments. • Standardization: If data entered by the Member can be standardized, LinkedIn computes the standardized attributes (e.g., job function, job title, and job seniority based on Member-input in their profile). For example, the job title of “SEO consultant” would be standardized to be “Search Engine Optimization consultant” on the backend to enable a Member to be found when someone searches for “search engine optimization consultant.” • Education: A Member can input their current and previous education experiences, including school attended, degree obtained, awards, and recognition. • Skills (Member provided): A Member can add skills to their profile and can also choose to associate those skills with a specific job title. A Member may have also received endorsements for skills from other Members. LinkedIn can also infer a Member’s skills based on other information the Member has provided. • Additional Expertise: A Member can input industry licenses and certifications earned, projects completed, LinkedIn Learning or other courses taken by that Member, and recommendations the Member received from other LinkedIn Members. • Additional Involvement: A Member can input additional professional involvement, including volunteer experience, publications, patents, honors and awards, test scores, languages spoken, organizations, and causes. • Interests (Member provided): A Member can choose to follow companies, schools, and people on LinkedIn, join topical groups of interest, and subscribe to newsletters, which are shown as part of the Member’s profile. 		

Category	Provided / Observed	Data Source
<ul style="list-style-type: none"> • Connections List: A Member uses LinkedIn to connect to other LinkedIn Members to build a professional network, which is part of their professional identity. 		
<p>Activity Data: interactions (<i>e.g.</i>, clicks, viewing data) with LinkedIn’s services, including:</p> <ul style="list-style-type: none"> • Member Feed Actions: clicks, likes, comments on LinkedIn’s Feed. • Member Feed Impressions with a Particular Topic: how often a Member interacts with content associated with a particular topic on the LinkedIn Feed. • Member Hashtag or Interest Follows: what topics a Member has followed on LinkedIn. • Post Viewing Data: related to how a Member interacts with a particular post (<i>i.e.</i>, how long does a Member dwell on a particular post, if a Member clicks “see more,” hides, or bookmarks a post). • Member Messaging Activity: how often a member sends LinkedIn Messages or InMails and response rate. • Article Activity: how often Members publish articles on LinkedIn. • Group Activity: engagement within Groups (joining and posting, sharing content within Groups). • Page Activity: liking, following, or engaging with a Page on LinkedIn. • Search history on LinkedIn and Sales Navigator. • Lead Activity in Sales Navigator: searching and saving leads or accounts in Sales Navigator. • Subscription Offer Impressions: how many times a Member saw a Premium subscription offer. • Activity Metrics: Data gathered based on how frequently a Member logs in to LinkedIn (<i>e.g.</i>, Monthly Active User or Weekly Active User). 	Observed	LinkedIn Online Social Networking Service

Category	Provided / Observed	Data Source
Connections Data: data about a Member's relationships on LinkedIn, including the acceptance rate of connection requests.	Observed	LinkedIn Online Social Networking Service
Geolocation Data: generalized location information (<i>e.g.</i> , city-level location) about a Member, on the basis of their IP address.	Observed	LinkedIn Online Social Networking Service
<p>Device and Browser Information: information about the device and browser a Member uses to access LinkedIn, including:</p> <ul style="list-style-type: none"> • Browser Type: what browser a Member uses to access LinkedIn (<i>e.g.</i>, Edge). • Connectivity Status: whether the device accessing LinkedIn is using a Wi-Fi network or cellular network to connect to the Internet. • Battery Life: what the battery life of the device is while accessing LinkedIn. • Operating System Type: what operating system and version a Member uses to access LinkedIn (<i>i.e.</i>, iOS or Android). 	Observed	LinkedIn Online Social Networking Service
Member Feedback: Member-provided feedback via solicited survey responses.	Provided	LinkedIn Online Social Networking Service
Learning Activity Data: Member activity data on LinkedIn Learning, including a Member's learning page views and number of hours watched of learning content.	Observed	LinkedIn Learning
Jobs Activity Data: Job-related activity data, including viewing, saving, and applying to jobs on LinkedIn Jobs.	Observed	LinkedIn Jobs
Advertising Activity Data: Member activity data related to interactions with first-party advertisements on LinkedIn (<i>i.e.</i> , clicks, views of advertisements on LinkedIn).	Observed	LMS

Source: LinkedIn

2.3. Description Of Categories Of Personal Data And Data Originating From Third Parties

c) a description of each category of personal data and data originating from third parties (in particular, distinguishing data and personal data originating from third parties, such as advertisers, publishers, developers, or others) and/or derived from user activity on third parties' services (in particular, distinguishing data and personal data categories actively provided by consumers from observed data and inferred data originating from third parties);

27. This section is not applicable to LinkedIn. LinkedIn does not use any Personal Data originating from Third Parties for the above-listed Consumer Profiling Techniques, including Personal Data or other data derived from Member activity on Third-Party services. LinkedIn uses other data, which is not Personal Data, originating from third parties regarding (i) organizations and (ii) the software products and services such organizations offer to support the “Knowledgeable Members to Ask” Consumer Profiling Technique.

2.4. Description Of Inferred Data About Consumers

d) a detailed description of the inferred data⁷ about consumers derived from the processing of the data and personal data listed in point (b) and/or (c) as well as an explanation of how such derived or inferred data were created;

Specific Inference Categories

28. Using the Consumer Profiling Techniques described above, LinkedIn creates the following types of inferences:

Inferred interests: inferences about a Member’s interests in a certain topic, industry, or product (*e.g.*, interest in EV vehicles, or an interest in a given product category like SaaS offerings).

Inferred personal characteristics: inferences about a Member’s personal traits, such as a Member’s inferred age and gender (*e.g.*, if a Member is 25 years old).

Career and job-related inferences: inferences about a Member’s career history, expertise including skills, job search and hiring-related activity, or if a Member uses a certain product related to their role (*e.g.*, if a Member appears to be a freelancer, or if a Member may be actively hiring for a role).

⁷ Inferred data are understood as data derived by the gatekeeper from the processing of observed data or data actively provided by the consumer. For example, consumers’ interests or socio-economic status. Further guidance on the distinction between provided data, observed data and inferred data, can be found in the European Data Protection Board’s Guidelines on the targeting of social media users.

LinkedIn activity inferences: inferences about a Member’s likely or predicted actions on LinkedIn (e.g., likelihood to watch certain content on LinkedIn or to post and share content on LinkedIn).

Product and subscription-related inferences: inferences related to and used by LinkedIn’s subscription offerings (LinkedIn Talent Services, LinkedIn Learning, LMS, LinkedIn Sales Solutions, and LinkedIn Premium) (e.g., predicting if a Member is likely to be a “decision maker” for IT purchases, or if a Member is likely to buy a LinkedIn Premium subscription).

29. For a description of how the inferred data related to Consumer Profiling Techniques are created, please see **Table 1** in **Section 2.1**.

2.5. Retention Duration Of Provided, Observed, And Inferred Data

e) the retention duration of each category of data and personal data listed in points (b), (c), and (d), or duration of retention of the profile itself;

30. LinkedIn maintains Member Personal Data for as long as the Member keeps their account open or as is needed to provide services to the Member, unless the Member specifically requests that LinkedIn delete certain data. If a Member chooses to close their account, automatic scripts delete Member Personal Data within 30 days of the request, unless it is reasonably necessary for LinkedIn to retain certain Personal Data beyond thirty days to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse (e.g., if we have restricted the Member’s account for breach of our Professional Community Policies), enforce our User Agreement, or fulfill the Member’s request to “unsubscribe” from further messages from us.
31. Inferences about Members are treated as Member Personal Data and thus are retained for as long as a Member’s account is open, unless the Member requests specific deletion of an inference, in which case it is deleted within 30 days of the request being accepted, a certain inference is deprecated by the inference owner team, or an inference is overwritten by a new inference of the same type.

2.6. Legal Ground For Each Purpose Of Profiling Consumers

f) the legal ground relied on by the gatekeeper under Article 6(1) and, where applicable, Article 9(2) of Regulation (EU) 2016/679. The reporting under the present point should distinguish the legal ground relied on under Regulation (EU) 2016/679 for the processing of personal data collected directly by the gatekeeper from the legal ground relied on for the processing of personal data originating from third parties;

32. LinkedIn details below the legal ground relied on under Article 6(1) of the GDPR for Personal Data processed in connection with each Consumer Profiling Technique.
33. LinkedIn is in the process of taking measures to comply with the Order set out in ¶423 of the Irish Data Protection Commission’s (“**IDPC**’s”) Decision in Case IN-18-08-3 (the

“**Decision**”) by 24 January 2025 (the “**Compliance Date**”). The Decision focuses on LinkedIn’s processing of certain categories of Personal Data for the purpose of “behavioural analysis and targeted advertising” and whether that processing complied with LinkedIn’s obligations under the GDPR. On 18 November 2024, LinkedIn filed a statutory appeal against the Decision in the Irish courts. On the same date, LinkedIn filed for leave to file an application for judicial review against the Decision with the Irish High Court.⁸ As of 31 December 2024, no date has been set by the Irish courts for issuance of final judgments in either the statutory appeal or the application for judicial review.

34. Notwithstanding these judicial challenges, and pending any final determination on whether LinkedIn’s past processing of Personal Data for the purpose of “behavioural analysis and targeted advertising” to LinkedIn Members complied with Article 6(1) of the GDPR, LinkedIn has commenced measures to comply with the Decision of the IDPC. These measures include shifting from reliance on Article 6(1)(f) GDPR (legitimate interests) to Article 6(1)(a) GDPR (consent) as a legal basis to process the following categories of first-party Personal Data of LinkedIn Members for personalized ads: inferred city location, inferred age range, inferred gender, data observed about or inferred from Member activity on LinkedIn and inferred interests and traits.
35. To obtain the Member Consents described immediately above, LinkedIn commenced a phased ramp of the new Consent interstitial starting in December 2024, with plans to ramp to 100% of EEA Members by the Compliance Date. As of 31 December 2024, a subset of LinkedIn Members have been ramped to the new Consent. In **Table 3** below, LinkedIn details the Consumer Profiling Techniques and GDPR Article 6(1) legal grounds that it relies on to process Personal Data for Members who have not been ramped to the new Consent, including (where relevant) the use of those Consumer Profiling Techniques of LinkedIn Members for personalized ads. LinkedIn also details the changes to GDPR Article 6(1) legal grounds and the impacted Consumer Profiling Techniques for Members who have been ramped to the new Consent.

Table 3. Consumer Profiling Techniques And GDPR Article 6(1) Legal Ground

Profiling Technique	Legal Ground Under GDPR Article 6(1)	Changes to GDPR Article 6(1) Legal Ground For Members Ramped To The New Consent As Of 31 December 2024 ⁹
Inferring Personal Characteristics About Members	Legitimate Interest	Consent for the processing of inferred age and gender data for personalizing ads to LinkedIn Members.

⁸ On 16 December 2024, the Irish courts granted LinkedIn’s application to file for judicial review on amended grounds.

⁹ Please note that the Article 6(1) GDPR legal grounds set out in this column apply only with respect to LinkedIn’s processing of Personal Data for personalizing ads to LinkedIn Members.

Profiling Technique	Legal Ground Under GDPR Article 6(1)	Changes to GDPR Article 6(1) Legal Ground For Members Ramped To The New Consent As Of 31 December 2024⁹
Inferring Member Career and Activity Related Attributes	Legitimate Interest	Consent for the processing of Member activity data on LinkedIn for personalizing ads to LinkedIn Members.
Inferring Member Interests	Legitimate Interest	Consent for the processing of inferred interests and traits for personalizing ads to LinkedIn Members.
Knowledgeable Members to Ask	Legitimate Interest	N/A
Inferring Member Skills	Legitimate Interest	N/A
Expert Contributors	Legitimate Interest	N/A
Advertising Segments	Legitimate Interest	Consent for the processing of inferred interests and traits for personalizing ads to LinkedIn Members.
Potentially Active Talent, Job Seekers, or Hirers	Legitimate Interest	N/A
Potential Customers for Products or Services	Legitimate Interest	N/A
Social Selling Index	Legitimate Interest	N/A
Potential Interest in LinkedIn Subscriptions	Legitimate Interest	N/A

Source: LinkedIn

36. As detailed above in **Section 2.3**, LinkedIn does not process Personal Data originating from Third Parties for the Consumer Profiling Techniques. Additionally, LinkedIn does not process sensitive Personal Data (as defined by Article 9 of the GDPR) for the purpose of these Consumer Profiling Techniques.

2.7. Consent Requirements For Each Profiling Technique

g) whether consent is required under Article 5(2) of Regulation (EU) 2022/1925 for the processing of data and personal data listed in points (b), (c) and (d) for each purpose of profiling consumers. The reporting under the present point should distinguish between consent under points (a) to (d) of Article 5(2) of Regulation (EU) 2022/1925. In addition, if consent is not required, the reporting under the present point should provide an explanation;

37. Consent under DMA Article 5(2)(a) is not required for the processing of Personal Data¹⁰ for LinkedIn’s Consumer Profiling Techniques because LinkedIn does not process, for the purpose of providing advertising services, Member Personal Data received from Third Parties for the Consumer Profiling Techniques. Consent under DMA Article 5(2)(c) is not required for the processing of Personal Data for LinkedIn’s Consumer Profiling Techniques because LinkedIn does not cross-use Personal Data from the LinkedIn CPS in services provided separately by Microsoft. Consent under DMA Article 5(2)(d) is similarly not required for LinkedIn’s Consumer Profiling Techniques because LinkedIn does not sign-in Members to combine their Personal Data from the LinkedIn CPS with other Microsoft services.
38. The extent to which Consent under DMA Article 5(2)(b) is required for the processing of Personal Data for LinkedIn’s Consumer Profiling Techniques is detailed in **Table 4** below.

Table 4. Consumer Profiling Techniques And DMA Article 5(2)(b) Consent

Profiling Technique	Consent Under DMA Article 5(2)(b)
Inferring Personal Characteristics About Members	<p>Consent under DMA Article 5(2)(b) is required for this purpose, but only with respect to data processing that results in combining Personal Data from the LinkedIn CPS with Personal Data from LinkedIn’s Jobs, Learning, and/or LMS services.</p> <p>Where the data processing at issue does not result in combining Personal Data as detailed immediately above, DMA Article 5(2)(b) Consent is not required.</p>
Inferring Member Career and Activity Related Attributes	<p>Consent under DMA Article 5(2)(b) is required for this purpose, but only with respect to data processing that results in combining Personal Data from the LinkedIn CPS with Personal Data from LinkedIn’s Jobs, Learning, and/or LMS services.</p>

¹⁰ DMA Article 5(2) applies only to the processing of Personal Data.

Profiling Technique	Consent Under DMA Article 5(2)(b)
	Where the data processing at issue does not result in combining Personal Data as detailed immediately above, DMA Article 5(2)(b) Consent is not required.
Inferring Member Interests	<p>Consent under DMA Article 5(2)(b) is required for this purpose, but only with respect to data processing that results in combining Personal Data from the LinkedIn CPS with Personal Data from LinkedIn’s Jobs, Learning, and/or LMS services.</p> <p>Where the data processing at issue does not result in combining Personal Data as detailed immediately above, DMA Article 5(2)(b) Consent is not required.</p>
Knowledgeable Members to Ask	Consent under DMA Article 5(2)(b) is not required for this purpose because the related data processing does not result in combining Personal Data from the LinkedIn CPS with Personal Data from LinkedIn’s LMS, Jobs, and/or Learning services.
Inferring Member Skills	Consent under DMA Article 5(2)(b) is not required for this purpose because the related data processing does not result in combining Personal Data from the LinkedIn CPS with Personal Data from LinkedIn’s LMS, Jobs, and/or Learning services.
Expert Contributors	Consent under DMA Article 5(2)(b) is not required for this purpose because the related data processing does not result in combining Personal Data from the LinkedIn CPS with Personal Data from LinkedIn’s LMS, Jobs, and/or Learning services.
Advertising Segments	<p>Consent under DMA Article 5(2)(b) is required for this purpose, but only with respect to data processing that results in combining Personal Data from the LinkedIn CPS with Personal Data from LinkedIn’s Jobs, Learning, and/or LMS services.</p> <p>Where the data processing at issue does not result in combining Personal Data as detailed immediately above, DMA Article 5(2)(b) Consent is not required.</p>
Potentially Active Job Seekers, Talent, or Hirers	Consent under DMA Article 5(2)(b) is required for this purpose, but only with respect to data processing that results in combining Personal Data from the LinkedIn CPS with Personal Data from LinkedIn’s Jobs, Learning, and/or LMS services.

Profiling Technique	Consent Under DMA Article 5(2)(b)
	<p>Consent under DMA Article 5(2)(b) is not required for this purpose for data processing that is outside the scope of DMA Article 5(2) or that does not result in combining Personal Data as detailed immediately above.</p>
<p>Potential Customers for Products or Services</p>	<p>Consent under DMA Article 5(2)(b) is required for this purpose, but only with respect to data processing that results in combining Personal Data from the LinkedIn CPS with Personal Data from LinkedIn’s Jobs, Learning, and/or LMS services.</p> <p>Consent under DMA Article 5(2)(b) is not required for this purpose for data processing that is outside the scope of DMA Article 5(2) or that does not result in combining Personal Data as detailed immediately above.</p>
<p>Social Selling Index</p>	<p>Consent under DMA Article 5(2)(b) is not required for this purpose because the related data processing does not result in combining Personal Data from the LinkedIn CPS with Personal Data from LinkedIn’s LMS, Jobs, and/or Learning services.</p>
<p>Potential Interest in LinkedIn Subscriptions</p>	<p>Consent under DMA Article 5(2)(b) is required for this purpose, but only with respect to data processing that results in combining Personal Data from the LinkedIn CPS with Personal Data from LinkedIn’s Jobs, Learning, and/or LMS services.</p> <p>Where the data processing at issue does not result in combining Personal Data as detailed immediately above, DMA Article 5(2)(b) Consent is not required.</p>

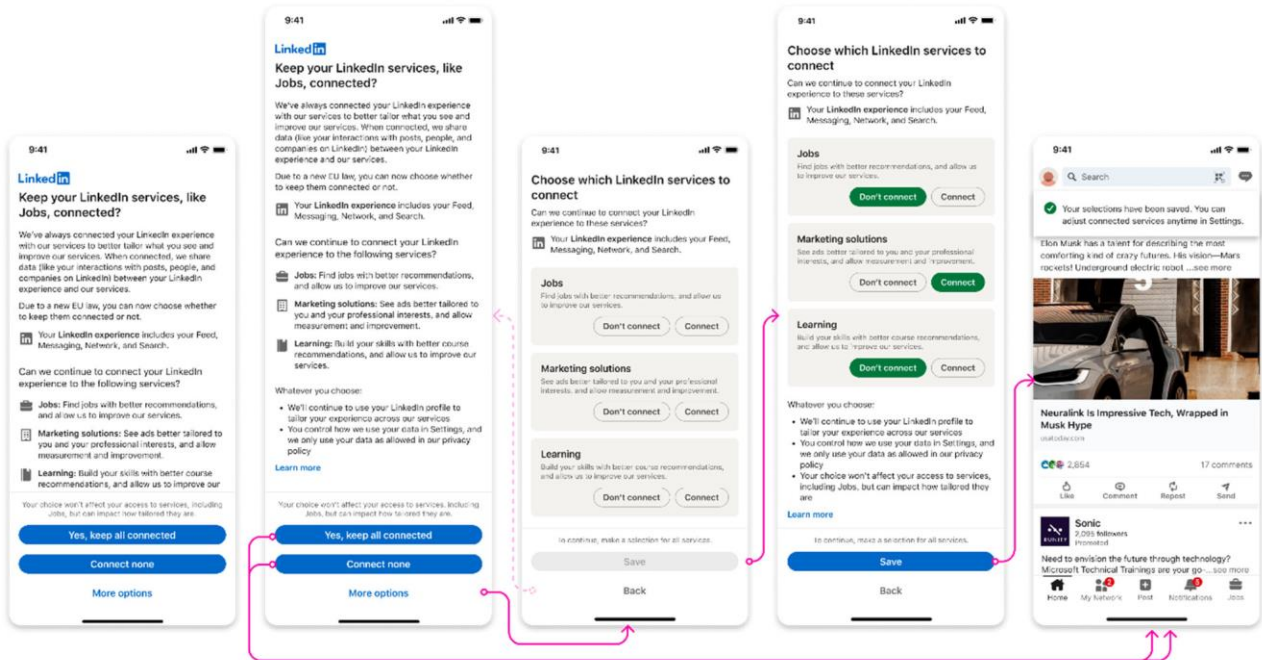
Source: LinkedIn

2.8. Additional Specifics Regarding Consent

h) where consumer consent is required for the given purpose and obtained by the gatekeeper under Regulation (EU) 2016/679, Directive 2002/58/EC and/or Regulation (EU) 2022/1925, a description of any steps taken to seek such consent to profiling, including visual representations (click-by-click) on how consumers can refuse or withdraw consent, any consequences of such refusal or withdrawal, and how any such consequences are notified to the consumer¹¹;

39. LinkedIn obtains Consent under DMA Article 5(2) (“DMA Consent”) from Members in connection with its Consumer Profiling Techniques as detailed in **Section 2.7** through the following Consent flow:

Figure 1. DMA Consent Flow



Source: LinkedIn

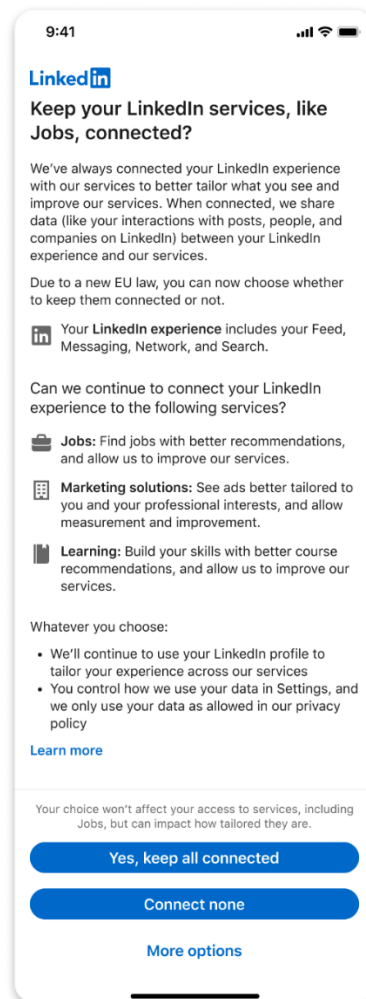
40. The DMA Consent is prompted to a Member after LinkedIn has processed the Member’s information and cannot be bypassed until answered. Member settings covered by the DMA Consent are otherwise set to “off” by default. If the Member chooses to connect all LinkedIn services, LinkedIn will combine the LinkedIn CPS Personal Data with Personal

¹¹ It should be clear from the description what measures (e.g., in design) the gatekeeper takes to guarantee a neutral presentation of choices to the end user, and the level of facility or ease (e.g., how many clicks) for an end user to refuse or change their consent. The consequences of such refusal or withdrawal should also be clear from the description.

Data from Jobs, LMS, and Learning to provide more personalized user experiences and improve those services.

41. The Consent screen includes two “call-to-action” (“CTA”) buttons for Members to choose and language that seeks to clarify that regardless of which button they choose, (1) the Members will still be able to access all the LinkedIn services, (2) their profile data will be used to personalize those services, and (3) LinkedIn will continue to respect their existing privacy settings pursuant to its Privacy Policy.

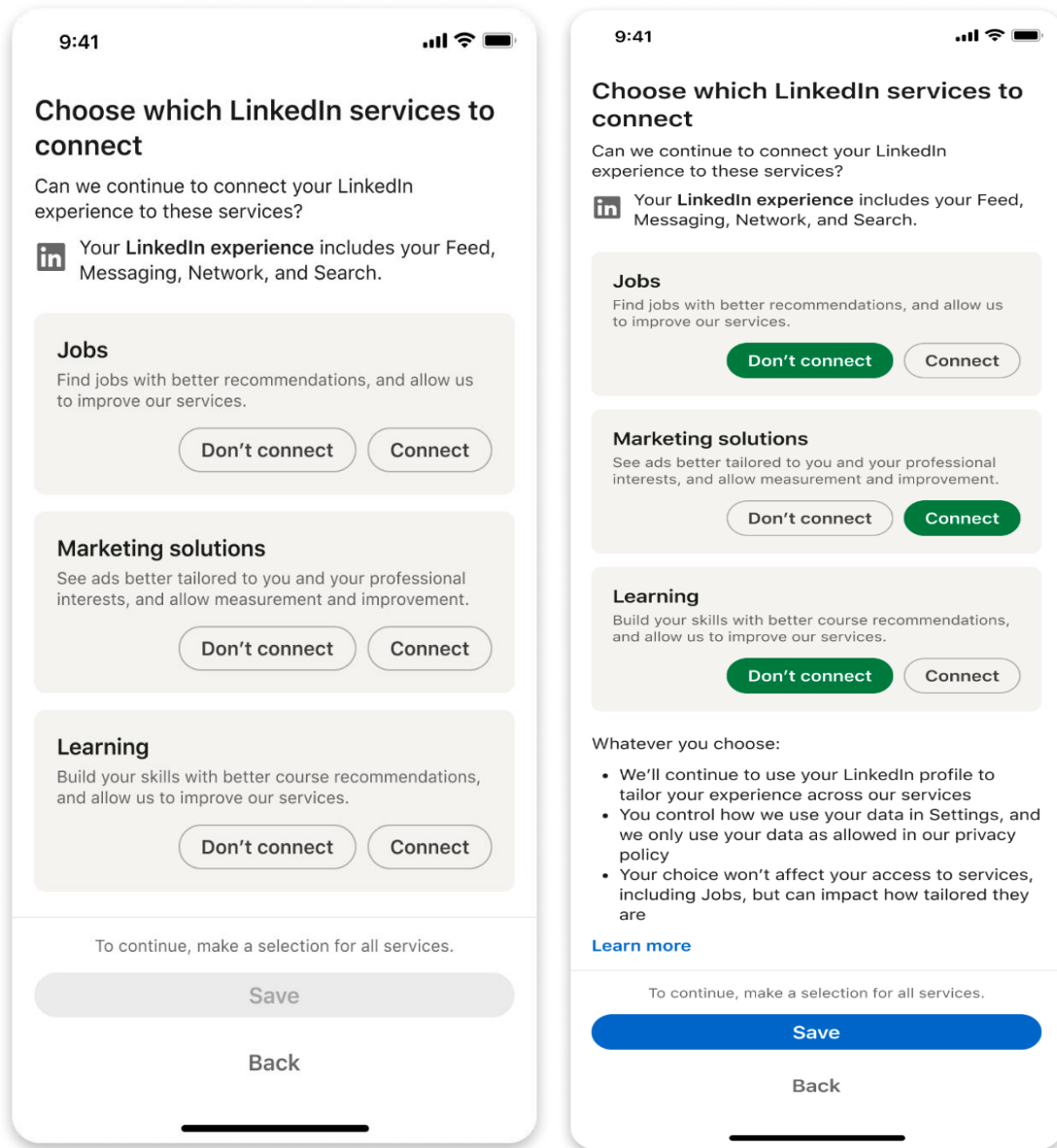
Figure 2. DMA Consent Screen



Source: LinkedIn

42. The Consent screen also provides a direct link to an options screen that enables Members to customize which LinkedIn services to connect (*see **Figure 3** below*). It further states that Members continue to control how their data is used through their Member settings.

Figure 3. DMA Consent Options Screen



Source: LinkedIn

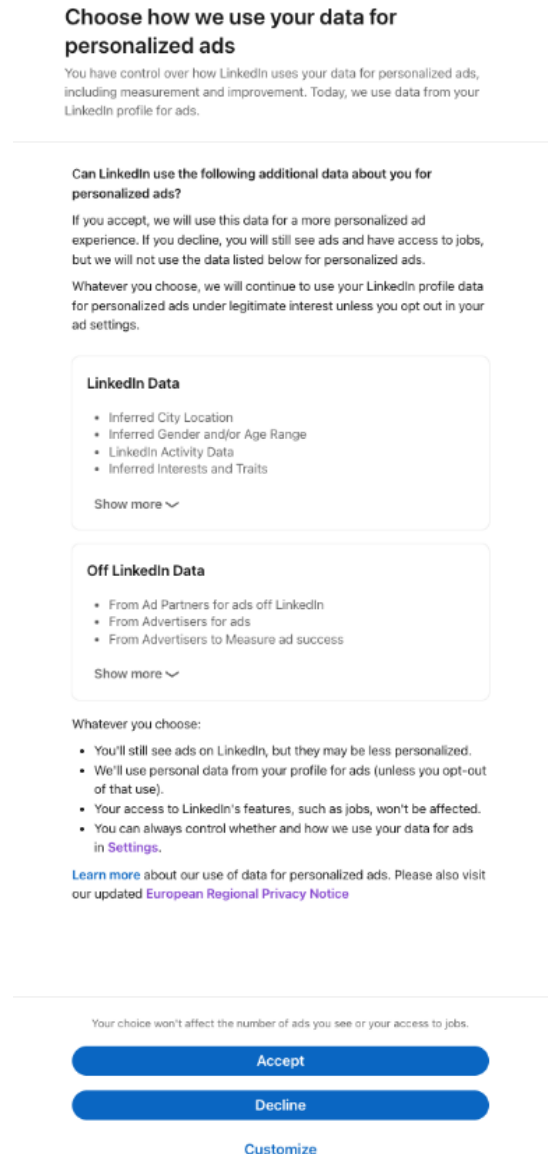
43. As illustrated in **Figure 2** above, the Consent screen provides a direct link to a Help Center page¹² under the “Learn more” option that enables Members to access more information about the DMA Consent, including detailed descriptions of what the LinkedIn services entail, what connecting those services means for the user experience, and what the result will be when a Member chooses to not connect all or some of LinkedIn’s services. As detailed on the Help Center page, regardless of the choice Members make about connecting services, Members will still be able to access all LinkedIn services. However, if a Member

¹² See [Connecting to LinkedIn Services | LinkedIn Help](#).

chooses not to connect any or all of the relevant services, it may result in some of these services being less relevant or less tailored to a Members’ professional interests.

44. As detailed in **Section 2.6**, to comply with the IDPC Decision, LinkedIn launched a phased ramp of a new GDPR Consent screen for Members to Consent to the processing of certain categories of Personal Data for the purpose of targeting ads to LinkedIn Members. The new GDPR Consent flow appears as follows:

Figure 4. New GDPR Consent Screen Collapsed View



Source: LinkedIn

Figure 5. New GDPR Consent Screen Expanded View

Choose how we use your data for personalized ads

You have control over how LinkedIn uses your data for personalized ads, including measurement and improvement. Today, we use data from your LinkedIn profile for ads.

Can LinkedIn use the following additional data about you for personalized ads?

If you accept, we will use this data for a more personalized ad experience. If you decline, you will still see ads and have access to jobs, but we will not use the data listed below for personalized ads.

Whatever you choose, we will continue to use your LinkedIn profile data for personalized ads under legitimate interest unless you opt out in your ad settings.

LinkedIn Data

- Inferred City Location
- Inferred Gender and/or Age Range
- LinkedIn Activity Data
- Inferred Interests and Traits

When you see ads delivered by LinkedIn, we hope that you find them useful. LinkedIn serves ads that are "personalized" which means we use the data that our members allow us to use to try to make the ads we serve our members (whether shown on or off LinkedIn) relevant to them. This includes measuring how ads perform (such as clicks and views) and using what we learn to improve our ad tools to make them more effective. The reports we share with advertisers only include aggregated data about ad performance.

For personalized ads, we use some personal data on an opt-out basis and other personal data on an opt-in basis.

Opt-out (Legitimate Interest): Unless you opt out in your ad settings, we use data from your LinkedIn profile (such as your city, employer, industry, or job type) for personalized ads, including measurement and improvement. The ad reports we share with advertisers include aggregated data about ad performance data such as ad views by company or ad clicks by job types.

Opt-in (Consent): We need your consent to also use the following data for personalized ads, including measurement and improvement:

- **Inferred city location:** We infer your city based on your IP address. We do not use your precise location to target ads.
- **Inferred gender and/or age range:** We infer these from your LinkedIn profile (such as name and graduation dates). We don't permit advertisers to target job ads by age or discriminate based on gender.
- **LinkedIn activity data:** Your activity on LinkedIn (such as your searches and engagement with jobs, ads and company content).
- **Inferred interests and traits:** We infer your interests and traits based on your LinkedIn profile and activity on LinkedIn. These do not include special categories of personal data, but can include inferred attributes such as expat, frequent traveler, job seeker, and more. We do not infer interests or traits from your "Off-LinkedIn Data".

You can control use of your data for personalized ads (and review your inferred "Interests and Traits") through your ad settings at any time.

Show less 

Off LinkedIn Data

- From Ad Partners for ads off LinkedIn
- From Advertisers for ads
- From Advertisers to Measure ad success

"Off LinkedIn Data" refers to data provided to LinkedIn **from others** for personalized ads, including measurement and improvement. The reports we share with advertisers only include aggregated data about ad performance.

We do not use this Off LinkedIn Data to infer "Interests or Traits" about you or link it to your iOS LinkedIn app activity data.

We need your consent to use "Off LinkedIn Data" that we can connect to you for ads.

- **Ad Partner Data for Ads Off LinkedIn:** Ad exchanges and other partners (such as site and app publishers) provide data (such as cookies and ad IDs) about visitors to their sites and apps. We use this data to recognize our members and decide whether to bid to place ads on other sites and apps. We measure the performance of these off LinkedIn ads (such as views and clicks) and include them in our aggregate ad reports for advertisers and also use this information to improve our ad tools.
- **Advertiser Data for Ads:** Advertisers provide us data (such as name, contact, or site visit info) about their users to help us direct their ads to these and similar audiences. We measure the performance of these ads (such as views and clicks) and include them in our aggregate reports for advertisers and also use that information to improve our ad tools.
- **Advertiser Data to Measure Ad Success:** Advertisers provide us data about actions taken in response to ads (such as visits, sign-ups and purchases). If we can connect this data to our members, we match it to data about ads we've shown so that we can measure ad performance. We also use that information to improve our ad tools. We generate ad reports for advertisers that measure ad performance (such as the conversion of an ad shown by LinkedIn into a sale of the advertised product). These aggregated reports do not identify you.

You can control use of your data for these purposes through your ad settings at any time.

Show less ^

Whatever you choose:

- You'll still see ads on LinkedIn, but they may be less personalized.
- We'll use personal data from your profile for ads (unless you opt-out of that use).
- Your access to LinkedIn's features, such as jobs, won't be affected.
- You can always control whether and how we use your data for ads in [Settings](#).

[Learn more](#) about our use of data for personalized ads. Please also visit our updated [European Regional Privacy Notice](#)

Source: LinkedIn

Figure 6. New GDPR Consent Screen Customize View¹³

Customize

Inferred city location
 Can we use your city location (inferred from your IP address) for personalized ads (including measurement and improvement)? If you turn this off, you may still see ads based on your country or continent and the location from your LinkedIn profile.

Inferred Gender
 Can we use your gender (from your profile or inferred from your profile) for personalized ads (including measurement and improvement)? We don't permit advertisers to discriminate based on gender.

Inferred Age Range
 Can we use your age range (from your profile or inferred) for personalized ads (including measurement and improvement)? We don't permit advertisers to target job ads by age range.

LinkedIn Activity Data
 Can we use your activity data from LinkedIn (such as visiting company pages, viewing jobs, and clicking or viewing ads) for personalized ads (including measurement and improvement)?

Inferred Interests and Traits
 Can we use interests and traits we inferred from your LinkedIn profile and "LinkedIn Activity Data" for personalized ads (including measurement and improvement)? These do not include the skills we may derive from your profile.

¹³

The new GDPR Consent settings relating to “Ad Partners Data for Ads Off LinkedIn,” “Advertiser Data for Ads,” and “Advertiser Data to Measure Ad Success” do not control the processing of data used for the purpose of LinkedIn’s Consumer Profiling Techniques. These settings relate to use of certain Third-Party data, which LinkedIn does not use for the Consumer Profiling Techniques described in this Report. LinkedIn has nonetheless included these settings here given they are part of the new GDPR Consent flow presented to Members.

Ad Partners Data for Ads off LinkedIn
 Ad partners such as ad exchanges and site and app publishers provide data (such as IP addresses, cookies and ad IDs) about visits to their sites and apps. Can we use data that we can connect to you about your visits to these other sites and apps for personalized ads off of LinkedIn (including measurement and improvement)? We do not use this data to infer your interests and traits.

Decline Accept

Advertiser Data for Ads
 Can we use information that you've given to our advertisers (such as contact information or device info from visits to their website) that LinkedIn can connect to you for personalized ads (including measurement and improvement)? The aggregated reports we provide advertisers do not identify you. We do not use this data to infer your interests and traits.

Decline Accept

Advertiser Data to Measure Ad Success
 Can we use data that Advertisers provide us about actions you've taken in response to ads (such as visits, sign-ups and purchases) that we can connect to you to measure and report ad performance (such as the conversion of an ad into a sale) and improve our ad tools? The aggregated reports we provide advertisers do not identify you.

Decline Accept

Whatever you choose:

- You'll still see ads on LinkedIn, but they may be less personalized.
- We'll use personal data from your profile for ads (unless you opt-out of that use).
- Your access to LinkedIn's features, such as jobs, won't be affected.
- You can always control whether and how we use your data for ads in [Settings](#).

[Learn more](#) about our use of data for personalized ads. Please also visit our updated [European Regional Privacy Notice](#)

To continue, make a selection for all services.

Save

Back

Source: LinkedIn

Figure 7. New GDPR Consent Screen Acknowledgement Notice

✔ Your selections have been saved. ✕
 You can adjust connected services anytime in Settings.

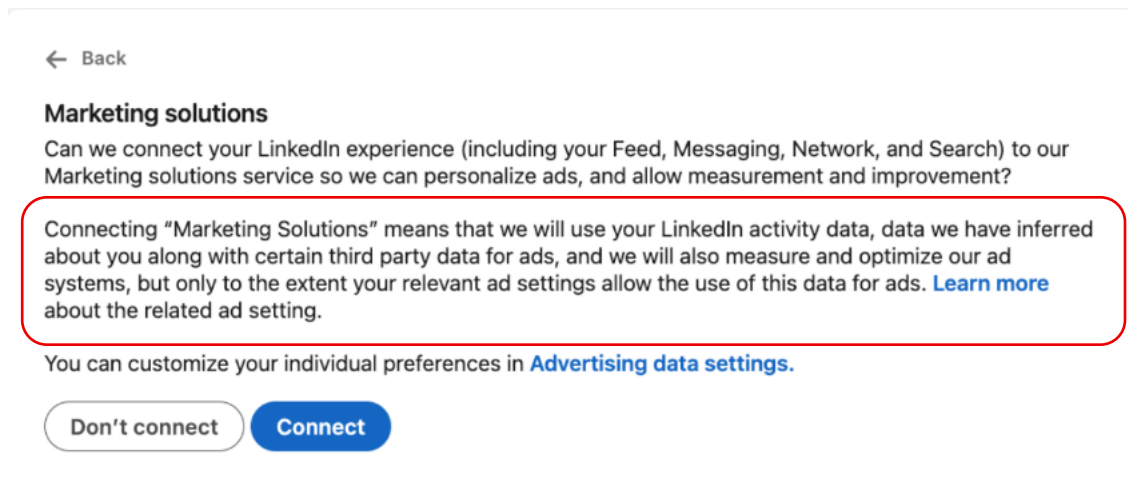
Source: LinkedIn

45. To ensure that Members are informed about how LinkedIn uses Personal Data for advertising in connection with the new GDPR Consent, Members can access a Help Center page with relevant information through the “Learn more” option on the GDPR Consent screen, as shown in **Figure 4** above.¹⁴

¹⁴ See [Ads by LinkedIn \(LinkedIn Marketing Solutions\)](#).

46. In the user experience, newly onboarding Members first see the DMA Consent screen, which is followed by the separate new GDPR Consent, promptly thereafter. For all new Members in the EEA who signed up to LinkedIn on 31 December 2024, the ad settings covered by the new GDPR Consent interstitial were set to “off” by default at onboarding. A subset of new Members were shown the new interstitial on 31 December 2024, as the phased ramp approach applied to both new and existing Members.
47. LinkedIn’s DMA Article 5(2) Consent relating to its LMS advertising service (“**DMA LMS Consent**”) has not changed with introduction of the new GDPR Consent detailed in **Section 2.6**, and LinkedIn has implemented internal policy-based data access controls for the purpose of processing Member’s Personal Data for personalized advertising subject to both the DMA LMS Consent and the new GDPR Consent settings. Prior to 6 March 2025, LinkedIn detected technical bugs involving the internal policy-based data access controls and system adjustments were implemented. When the Member withdraws Consent for either the DMA LMS Consent or any relevant ad setting for the new GDPR Consent, LinkedIn implements the data access controls to stop using the corresponding Personal Data for ads purposes.
48. LinkedIn adjusted its DMA LMS Consent setting language, as shown in **Figure 8** below, to make it clear to Members that even where they have consented to the DMA LMS Consent, the Personal Data covered under the GDPR Consent will only be processed for advertising purposes if the Member has also consented to the processing of such data through the new GDPR Consent (or related ad setting).

Figure 8. LinkedIn Revised DMA LMS Consent Setting Language



Source: LinkedIn

49. To ensure that Members are informed about the impact of their choices in the two separate Consent experiences, LinkedIn has also updated its Help Center¹⁵ with information for Members about the interplay between the DMA LMS Consent and new GDPR Consent.

¹⁵ See [Marketing Solutions Service \(DMA\) and Ads Settings \(GDPR\) Interactions | LinkedIn Help](#).

The Help Center page can be accessed by clicking on the “Learn more” button on the DMA LMS Consent setting page, as shown in **Figure 8** above.

2.9. Consent Obtained By Third Parties

i) where consumer consent is required for the given purpose and obtained by third parties (e.g., as required under Article 5(2)(a) of Regulation (EU) 2022/1925), a description of any steps taken to seek consent to the sharing of personal data with the gatekeeper for the purpose of profiling, including visual representations (click- by-click) on how consumers can refuse or withdraw consent, and how the gatekeeper ensures respect of consumer’s consent refusal or withdrawal¹⁶;

50. This section is not applicable to LinkedIn. LinkedIn does not use any Personal Data originating from Third Parties for the Consumer Profiling Techniques, including Personal Data or other data derived from Member activity on Third-Party services. Therefore, LinkedIn does not obtain Consent by Third Parties for the above-mentioned Consumer Profiling Techniques.

2.10. Whether Automated Decision-Making Takes Place On The Basis Of An Applied Profiling Technique

j) whether automated decision-making takes place on the basis of an applied profiling technique, the number and object of such automated decisions, the legal effects and other similarly significant effects¹⁷ that that the automated- decision making mechanism is producing or may produce, and a description of the algorithms underpinning the automated decision mechanism;

51. LinkedIn does not perform any Automated Decision-Making, which means decisions based solely on automated processing that produce legal or similarly significant effects, as referred to in Articles 22(1) and 22(4) of the GDPR. The above-listed Consumer Profiling Techniques do not produce legal or similarly significant effects for End Users.

52. LinkedIn Consumer Profiling Techniques are used in certain Downstream Use Cases, as detailed in **Table 5** below.

Table 5. Consumer Profiling Techniques Downstream Use Cases

Downstream Use Case	Based on What Technique(s)	Further Detail / How The Models Work
Recommending People	Inferring Personal Characteristics About Members, Inferring	Here, the Downstream Use Cases are: <ul style="list-style-type: none"> • Determining who LinkedIn recommends to

¹⁶ The gatekeeper should refer to a consent framework to which it adheres.

¹⁷ A decision produces legal effects when the subject’s legal rights are impacted. This could include, for example, any resulting effect on the right to vote, their ability to take out a loan, and their position in e-recruitment.

Downstream Use Case	Based on What Technique(s)	Further Detail / How The Models Work
	Member Interests, Potentially Active Job Seekers, Talent, or Hirers, Knowledgeable Members to Ask, Inferring Member Career and Activity Related Attributes	Members (as potential connections, people to follow, or Members to ask) and to Customers (as potentially active job seekers); and <ul style="list-style-type: none"> Determining how those recommendations appear in a Member’s Feed or other surfaces (<i>i.e.</i>, how Members are prioritized within a list of recommended connections). <p><u>People You May Know (“PYMK”) model:</u>¹⁸ recommends other Members to consider connecting with or following. Based on Consumer Profiling Technique outputs, like personal characteristic inferences, Member interests, and job seeker score, along with Member profile data and information about the Member’s existing network (including, Member geographic region, proximity to other connections), the model suggests potential connections to Members.</p> <p><u>Follows:</u> The Follows model recommends other Members, companies, events to a Member, based on Consumer Profiling Technique outputs like personal characteristic inferences and job seeking score, along with Member profile information and Feed activity (<i>e.g.</i>, who a Member is currently following, who his or her connections currently follow).</p>
Recommending Actions to Take on LinkedIn	Inferring Personal Characteristics About Members, Inferring Member Career and Activity Related Attributes, Inferring Member Skills, Inferring Member Interests, Potentially Active Job Seekers, Talent, or Hirers	Here, the model recommends what action a Member should take next on LinkedIn. [CONFIDENTIAL].
Recommending Relevant Content on LinkedIn	Inferring Member Interests, Inferring Personal Characteristics About Members, Inferring	Here, the Downstream Use Cases determine: <ul style="list-style-type: none"> What content to show Members in Feed;

¹⁸ In certain cases, references to a “model” may include several related models that are used for accomplishing the same purpose

Downstream Use Case	Based on What Technique(s)	Further Detail / How The Models Work
	<p>Member Career and Activity Related Attributes, Inferring Member Skills, Expert Contributors, Potentially Active Job Seekers, Talent, or Hirers</p>	<ul style="list-style-type: none"> • What Groups, Pages, and events to recommend to Members; • What LinkedIn Learning courses to recommend to Members; and • What search results may be relevant to Members. <p><u>What content to show in Feed (Feed relevancy):</u> Feed relevancy consists of a family of models that work together to populate a Member’s Feed with relevant content. These models use data like a Member’s geographic location, a Member’s connections, and inputs from Consumer Profiling Techniques (including inferences that a Member may be a job seeker or may have an interest in a particular topic), to rank and display content in a Member’s Feed. These models work together to perform scenario-specific or point-in-time matching to dynamically sort and rank content within LinkedIn’s Feed.</p> <p><u>What groups to recommend:</u> Groups You Might be Interested In (“GYMBII”) uses Consumer Profiling Technique outputs including Member skills, along with Member profile data, including Member-selected industry, education attainment, company and other standardized data inputs to recommend groups for a Member to join or view.</p> <p><u>What Pages to recommend:</u> Page Recommender recommends relevant Pages for a Member to follow, based on inferred Member interests and personal characteristics, as well as the Member’s profile and activity data, including what Pages the Member currently follows, what Pages the Member’s connections follow and other standardized Member Personal Data including Member industry, role, and company.</p> <p><u>What events to recommend:</u> Event Recommender is a model that uses Consumer Profiling Technique outputs including Member interests, along with Member profile and activity data (past event history) to match and suggest</p>

Downstream Use Case	Based on What Technique(s)	Further Detail / How The Models Work
		<p>events that a Member may be also interested in attending.</p> <p><u>What LinkedIn Learning courses to recommend:</u> Recommends LinkedIn Learning courses to a LinkedIn Learning user, based on Consumer Profiling Technique outputs including Member skills, along with learning activity data (e.g., previous learning courses taken).</p> <p><u>Deliver relevant search results:</u> These models use Consumer Profiling Technique outputs like a Member’s job seeker score, and personal characteristic inferences like inferred language as model features to rank and prioritize relevant search results for Members.</p>
<p>Recommending Jobs-Related Actions or Insights</p>	<p>Potentially Active Job Seekers, Talent, or Hirers, Inferring Member Skills, Inferring Member Career and Activity Related Attributes</p>	<p>Here, the Downstream Use Cases include models that determine:</p> <ul style="list-style-type: none"> • What jobs are recommended to Members; and • What job seekers are shown and how they are displayed within LinkedIn Recruiter search results to recruiters. <p>Jobs You Might Be Interested In (“JYMBII”) is a relevancy model that displays job postings to a Member in the Feed or on the Jobs Tab. The model uses Consumer Profiling Technique outputs like job seeker score, and inferred skills, along with Member profile data (including skills, company, title and standardized data like seniority), activity data (Member recent job searches on LinkedIn, set job alerts on LinkedIn), to determine open job postings that may be most relevant to the individual Member and then display those postings to the Member in their Feed or on the Jobs Tab.</p> <p><u>Recruiter Search relevancy:</u> LinkedIn Recruiter Search is a model-powered tool within LinkedIn that provides relevant search results to hirers seeking potential job candidates. Recruiter Search enables recruiters to search for potential candidates using Member profile attributes. If a Recruiter user has an open job posting, the tool can also provide information about Members</p>

Downstream Use Case	Based on What Technique(s)	Further Detail / How The Models Work
		<p>who match relevant characteristics identified in the job posting. These results are based on assessing Consumer Profiling Techniques outputs, like Member skills, along with their Member profile data and activity on LinkedIn (e.g., work experience, title, seniority), against requirements included in the job listing (e.g., must have 5+ years of experience in the relevant industry).</p> <p><u>Recommended Matches:</u> Recommended Matches is a model-powered feature in LinkedIn Recruiter that shows potential candidates that are similar to Members that a Recruiter Customer has recently viewed in Recruiter Search. Recommended Matches uses outputs of Consumer Profiling Techniques such as job seeker score, along with Member Personal Data and activity data to find Members that are like other Members that a Recruiter has recently viewed and display them on a search results page.</p> <p><u>Job Seeker Coach:</u> Job Seeker Coach is a model-powered feature that allows Premium Members who visit the “Job details” page or “Jobs Home” page of the Jobs tab of LinkedIn to view additional job-related insights that help the Member evaluate their fit for a job and take action to better position themselves before they apply. Based on the Member’s natural language prompt, and the Consumer Profiling Technique outputs of Inferring Personal Characteristics, Inferring Member Career And Activity Related Attributes, along with Member Personal Data, Job Seeker Coach recommends job-related actions to Members (e.g., updating their Profile to highlight certain skills listed in a job post).</p>
When to Send Members a Notification	Inferring Personal Characteristics About Members, Inferring Member Career and Activity Related Attributes, Potentially Active Job Seekers, Talent, or Hirers, Inferring Member Skills,	<p>Here, the Downstream Use Cases relate to how LinkedIn presents relevant notifications to its Members, specifically:</p> <ul style="list-style-type: none"> • What channel notifications are presented in (email, push, in-app notifications); • Content of notifications (email headings,

Downstream Use Case	Based on What Technique(s)	Further Detail / How The Models Work
	<p>Potential Customers for Products or Services, Potential Interest in LinkedIn Premium Subscriptions</p>	<p>subject lines);</p> <ul style="list-style-type: none"> • How the notifications are ranked within the notification channels; and • What Members get the notifications. <p>These notification models predict the likelihood that a Member will click on or engage with a notification, based on Consumer Profiling Technique outputs including a Member’s Job Seeker Score, skills, and activity inferences, as well as Member profile data (e.g., education, connections) and activity data, such as previous ad interactions.</p> <p><u>What Channel: Channel Engagement Model:</u> This model predicts what a Member’s marketing channel is (email, in- app notification, push notification) and the likelihood of engaging with each notification, based on Consumer Profiling Techniques including Member skills along with Member profile data and activity data.</p> <p><u>What Content:</u> These copy models personalize email subject and copy based on Consumer Profiling Technique outputs like activity inferences and Member Personal Data, such as profile and Member activity data.</p> <p><u>Re-ranked within Channel:</u> These re-ranking models prioritize notifications shown to Members in the in-app notification tab, based on Consumer Profiling Technique outputs like Job Seeker Score along with Member activity data.</p> <p>[CONFIDENTIAL].</p>
<p>Determining Copy of LinkedIn Subscription Offers</p>	<p>Potential Interest in LinkedIn Premium Subscriptions</p>	<p>Here, the Downstream Use Case is a model that:</p> <ul style="list-style-type: none"> • Determines what copy is used in a LinkedIn Premium Subscription Offer. <p>[CONFIDENTIAL].</p>
<p>Product Interfaces for Advertising Segments</p>	<p>Advertising Segments, Potential Customers for Products or Services,</p>	<p>LinkedIn enables LMS Customers to direct advertising campaigns to relevant audiences among LinkedIn’s Members using Advertising</p>

Downstream Use Case	Based on What Technique(s)	Further Detail / How The Models Work
	Inferring Member Interests, Potentially Active Job Seekers, Talent or Hirers, Social Selling Index, Inferring Personal Characteristics About Members	Segments, which leverage outputs from models used for other Consumer Profiling Techniques.

Source: LinkedIn

2.11. Qualitative And Quantitative Impact Or Importance Of The Profiling Techniques

k) qualitative and quantitative impact or importance of the profiling techniques in question for the services and business operations of the gatekeeper. Under this point, please also include information on the number of end users exposed to each profiling technique per year, and the number of business users using the gatekeeper’s services based on profiling per year, within the core platform service and, where relevant, across multiple core platform services;

53. LinkedIn’s Consumer Profiling Techniques have a qualitative impact for its interest in:

- the establishment and conduct of LinkedIn’s business;
- provision of LinkedIn’s services;
- enabling and assisting LinkedIn Members and Customers to:
 - access and provide services;
 - assemble and associate;
 - express themselves, including imparting and receiving information;
 - educate themselves;
 - choose an occupation, engage in and move for work; and
 - establish and conduct business.

54. LinkedIn does not track the quantitative impact of specific Consumer Profiling Techniques. Instead, LinkedIn tracks the quantitative impact of new or updated features (which may or may not involve Consumer Profiling Techniques) through engagement or financial metrics, including: daily, weekly, and monthly active user count; sessions rate (*i.e.*, how long does a Member spend on LinkedIn in a single session); and annual recurring revenue (*i.e.*, what is the revenue associated with subscription-based offerings).

55. All End Users located in the EU are exposed to all above-described Consumer Profiling Techniques. For the 2024 fiscal year, there were c. 154,000,000 End Users of the LinkedIn CPS located in the EU, which represents the total number of registered Members located in the EU.
56. Business Users of the LinkedIn CPS include users of LinkedIn Pages, Recruiter, and Sales Navigator. The total number of Third-Party organizations that have a LinkedIn Page with at least one administrator account holder located in the EU and at least one administrator action during the 2024 fiscal year was [CONFIDENTIAL]. The total number of Recruiter and Sales Navigator users located in the EU for fiscal year 2024 was [CONFIDENTIAL]. Business Users of LinkedIn’s Recruiter and Sales Navigator services may use those services based on certain Consumer Profiling Techniques.
57. Business Users of LinkedIn’s online advertising service are users of LMS. The total number of LMS users for the 2024 fiscal year in the EU was [CONFIDENTIAL]. Business Users of LinkedIn’s LMS service may use that service based on certain Consumer Profiling Techniques.

2.12. Actions Taken To Effectively Enable Consumers To Be Aware That They Are Undergoing Profiling And The Relevant Use Of Such Profiling

l) actions taken to effectively enable consumers to be aware that they are undergoing profiling and the relevant use of such profiling;

Legal Documents

58. Transparency regarding Consumer Profiling Techniques begins with LinkedIn’s User Agreement and Privacy Policy, which broadly describe how LinkedIn leverages such Consumer Profiling Techniques and how these techniques may influence a Member’s experience on LinkedIn, such as creating personalized recommendations or surfacing relevant ads to a Member on LinkedIn. All Members are required to acknowledge and agree to each of these documents upon account creation, and the documents are also readily available to Members as they use LinkedIn. In addition, LinkedIn’s European Regional Privacy Notice supplements LinkedIn’s Privacy Policy and contains additional information for Members located in countries in the EU, European Economic Area (“EEA”), and Switzerland (all “Designated Countries”) and the United Kingdom.¹⁹ If LinkedIn makes material changes²⁰ to its User Agreement or Privacy Policy, LinkedIn will provide notice through its services, or by other means (e.g., by email), to provide Members the opportunity to review the changes before they become effective.

Public-Facing Materials: Help Center Articles, In-Product Notices

¹⁹ See [LinkedIn European Regional Privacy Notice](#).

²⁰ A “material change” includes but is not limited to a change with significant impact on a Member’s rights, a change to the data collected or processed that would be surprising to a Member, a change to the identity of the controller, or a change as to how data subjects can exercise their rights in relation to the processing.

59. Building upon the legal documents, LinkedIn provides additional detail about certain Consumer Profiling Techniques through its online Help Center (*see **Table 6*** below). Help Center articles relating to these Consumer Profiling Techniques explain what data and/or Personal Data is processed through a technique, how LinkedIn leverages that data to power a feature or product, and what choices a Member may have around the Consumer Profiling Technique.
60. Additionally, LinkedIn discloses and provides granular control over certain Consumer Profiling Techniques for Members through in-product notices and Member settings.

Table 6. Consumer Profiling Techniques And Corresponding Publicly Available Links

Profiling Technique	Links
Inferring Personal Characteristics About Members	Inferences Overview Help Center Article How to request copy of inferences via data subject access request Help Center Article Inferred Age or Gender on LinkedIn Help Center Article
Inferring Member Career and Activity Related Attributes	Inferences Overview Help Center Article How to request copy of inferences via data subject access request Help Center Article
Inferring Member Interests	Feed Overview Help Center Article Member Interests and Traits Targeting Help Center Article Member Settings: Interest Categories
Knowledgeable Members to Ask	Ask people about a product on LinkedIn Help Center Article
Inferring Member Skills	Inferences we make about you Help Center Article Add key skill suggestions to your profile Help Center Article
Expert Contributors	Collaborative articles FAQ Help Center Article Add a contribution to a collaborative article Help Center Article Collaborative Articles Overview Help Center Article
Advertising Segments	Member Interest and Traits Targeting Help Center Article Member Settings: Interest Categories Targeting Options for LinkedIn Ads Help Center Article

Profiling Technique	Links
	How LinkedIn uses personal data for ads
Potentially Active Talent, Job Seekers, or Hirers	Spotlights in Recruiter and Jobs Help Center Article
Potential Customers for Products or Services	Sales Navigator Alerts Overview Help Center Article Sales Navigator Inputs Help Center Article Buyer Intent in Sales Navigator Help Center Article Product Category Intent in Sales Navigator FAQ Help Center Article Product Category Intent in Sales Navigator
Social Selling Index (SSI)	How Sales Navigator SSI is Calculated Help Center Article
Potential Interest in LinkedIn Subscriptions	Premium subscription offers you may see Help Center Article

Source: LinkedIn

2.13. Statistics On How Many Consumers Choose To Undergo Profiling Or Refuse It, If They Are Given A Choice

m) statistics on how many consumers choose to undergo profiling and how many refuse it, if such choice is given;

61. LinkedIn interprets the terms “choose” and “choice” in this section to refer to obtaining of Consent as a basis for data processing. As detailed in **Section 2.6**, starting in December 2024, LinkedIn began relying on a new Consent under GDPR Article 6(1)(a) for certain Personal Data processed for the following Consumer Profiling Techniques insofar as such data is processed for the purpose of targeted advertising: Inferring Personal Characteristics About Members, Inferring Member Interests, Inferring Member Career and Activity Related Attributes, and Advertising Segments. LinkedIn is engaging in a phased ramp of the new Consent interstitial, which started in December 2024 and will continue through 24 January 2025. Given this, statistics accurately representing how many Members have chosen to undergo Profiling and how many have refused are not available.

2.14. Whether And When The Profiling Technique Has Been The Subject Of A Data Protection Impact Assessment And The Main Conclusions Thereof

n) whether and when the profiling technique has been the subject of a data protection impact assessment²¹ and the main conclusions thereof;

62. Data protection impact assessments (“DPIAs”) for the Consumer Profiling Techniques detailed in **Section 2.1** were conducted on or before 31 December 2024. These DPIAs determine that the processing of Personal Data does not carry any residual high risks to data subjects. Identified risks are adequately mitigated, and LinkedIn has appropriate technical and organizational measures in place to significantly mitigate the potential impact on data subjects’ interests and fundamental rights.

2.15. Any Alternative Measures To Profiling That Have Been Considered And The Reasons For Not Choosing Them

o) any alternative measures to profiling that have been considered and the reasons for not choosing them.²²

63. LinkedIn interprets “any” to not require a discussion of “all” alternative measures. As of 31 December 2024, LinkedIn uses Consumer Profiling Techniques for four main purposes: (1) personalize Members’ experience on the LinkedIn platform by understanding their goals and interests; (2) deliver relevant advertising to LinkedIn Members; (3) provide features to Customers in LinkedIn subscription services; and (4) promote LinkedIn subscription services to Members. As of 31 December 2024, LinkedIn has considered various alternative measures to the above-mentioned Consumer Profiling Techniques and makes use of those measures alongside its Consumer Profiling Techniques. Where LinkedIn uses Profiling in lieu of or in addition to these and other alternatives, it is because LinkedIn has deemed it could not as effectively meet its Members’ and Customers’ expectations and goals through alternative means.

²¹ A data controller must carry out a data protection impact assessment under Article 35 of Regulation (EU) 2016/679 in certain circumstances that may also involve profiling.

²² Asking for alternatives to profiling allows an assessment of whether gatekeepers have considered less intrusive measures and is particularly informative in terms of accountability.