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Summary

Processing of personal data in the process of selecting personalised online advertising

The doctoral dissertation addresses the legal basis for processing personal data in the context of selecting personalized online advertising within the framework of real-time bidding (RTB). This subject is particularly relevant in light of the dynamic development of digital marketing and the increasing role of artificial intelligence tools in analyzing and enriching user profiles. The primary objective of the dissertation was to verify the research hypothesis that it is possible to design and implement a model of data processing legalization in RTB that ensures compliance with the requirements of the GDPR.

The dissertation consists of an introduction, three chapters, and a conclusion. In the introduction, the author formulates the research aim and problem, sets out the research hypothesis and auxiliary questions, and outlines the adopted research methodology.

The first chapter is devoted to analyzing personal data processed in the context of personalized advertising. It verifies whether the information used in the RTB model, including online identifiers, meets the criteria for classification as personal data under Article 4(1) of the GDPR. It is demonstrated that user profiles include both ordinary personal data and special categories of personal data, including data generated through inference using artificial intelligence tools. The research also identified the use of special data processing operations such as profiling and automated decision-making. The chapter highlights the problem of the "black box" effect, which refers to the inability to predict the full scope of data generated by algorithms, with significant implications for GDPR compliance.

The second chapter examines the practice of legalizing personal data processing in RTB. The analysis covered documents of the entity responsible for introducing the leading technical standard for personalized advertising in this model, as well as publicly available documents, including the privacy policies of twenty-four of the most popular RTB participants. The findings revealed that the primary legal bases invoked are consent (Article 6(1)(a) GDPR) and legitimate interest (Article 6(1)(f) GDPR), with occasional reference to contractual

necessity under Article 6(1)(b) GDPR. However, the author identified numerous deficiencies in the applied practices, including the conflation of legal bases, a lack of transparency, and a disregard for special categories of personal data and specific processing operations. Consequently, it was concluded that the existing solutions do not provide sufficient protection for the rights and freedoms of data subjects.

The third chapter seeks to answer the question of how personal data should be lawfully processed in RTB. The author proposed an original human-centered model of legalization, in which personal data are treated not as an economic asset but as an element of individual identity and dignity. This model relies primarily on explicit consent, understood as a free, informed, specific, and unambiguous expression of will, supplemented by additional safeguards concerning the use of artificial intelligence tools.

The conclusion summarizes the findings presented in the three chapters, which correspond to six auxiliary research questions, and proposes three *sine qua non* recommendations. The final conclusion emphasizes that recognizing personal data as an integral element of individual identity, rather than as a commodity, is a necessary condition for aligning technological innovation with the protection of fundamental rights.