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Mobile & connected marketing guide

⚲ Contents

◎ Contents

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Introduction

What is mobile marketing?

Mobile marketing refers to the process of marketing campaigns delivered via a mobile device.

Mobile campaigns are a powerful medium to support your marketing goals – acquisition, retention, branding, experiential, customer service, utility or CRM applications.

It offers your customer highly relevant and versatile interaction with your marketing campaign – at the right moment, almost wherever they go, via a range of channels and with dynamic, personalised content.

Personal

Nearly everyone now has a mobile phone, with more than half of users owning a smartphone, whilst tablets and other connected devices are also common.

This means that your customer almost certainly has a mobile device that is usually with them, always on and, more than any other medium, is unique and personal to them.

This brings huge opportunities for high-quality one-to-one marketing and customer service – but also a huge responsibility to make sure that any marketing is truly relevant, beneficial and welcomed by your customer.

Constant

For many people, checking their mobile is the first thing they do when they wake up. It is also the last thing they do at night – and dozens of times in between, throughout the day, often taking priority over any other activity or company.

Sensitive

Beyond compliance with the law and the DMA Code, this guide is about becoming more sensitive and sophisticated as a marketer – more in tune with your customer, more sensitive to their needs and privacy and more intelligent in your marketing approaches.

Put simply, best practice and legislation is about delivering marketing that is beneficial to your customer.

With mobile being so uniquely personal and intrusive in your customer's daily life, it is especially important that you act sensitively and fairly when using the medium.

Get it wrong and you won't just risk official reprimand – you will be marketing badly, in a manner that will alienate the very customers you rely on for your prosperity, and jeopardising our industry's right to self-regulate and market to consumers in general.

Universal

Almost everyone now has a mobile phone – from children to the elderly, from the lowest income to the highest.

Producing a thorough Privacy Impact Assessment (PIA) at the beginning of any project will force you to truly understand your audience and the unique ways in which the perceive and use their mobile devices.

i   Introduction

Key issues

When creating your mobile campaign, you need to address a number of critical areas particular to this medium.

These include:

- Collection of permission from your customer
- Areas of particular sensitivity – such as location, age and product type
- Technical compatibility
- Any cost implications for your customer – such as any cost to respond by SMS or data connection

Key technologies

Key mobile marketing technologies:

- Messaging – SMS, MMS, instant messaging (IM) and in-app (or 'push') messaging
- Mobile web – browser-based experiences designed specifically to be used via mobile devices
- Apps – including both:
    - Native apps – developed specifically for a particular device or operating system
    - Hybrid apps – developed using web coding languages to run across different platforms
- Proximity marketing – WiFi, Bluetooth and near field communications (NFC)

Additional mobile technology channels include:

- Transaction – such as payments or voucher redemptions
- Visual response – including quick recognition (QR) and image recognition, such as augmented reality (AR)
- Location-based services (LBS) – those that use the mobile device's location to tailor the service
- Mobile social media channels – such as Instagram or Vine

Increasingly, mobile campaigns are delivered across several or all of these channels and are integrated with other media in the marketing mix.

Business practice

Compliance

Mobile's outstanding virtue is that it is the most personal of one-to-one media. This, however, brings with it significant obligations on your part to respect your customer's privacy and to operate with the utmost transparency with regard to your customer's permission to communicate – as well as any cost implications to them for participating in your campaign.

There is a wealth of legislative and best practice requirements of which you must be aware – but it all works towards making and keeping the medium beneficial to your customer.

Best practice in the mobile channel can be described, in short, as understanding your customer's expectations from your brand and ensuring that you meeting them.

Key legislation

The two key pieces of legislation governing mobile and connected device marketing are:

The Data Protection Act 1998 (DPA)

The Privacy and Electronic Communications (EC Directive) Regulations 2003 (as amended) (PECR)

Industry codes

Mobile marketing is also subject to code requirements from the following industry bodies:

The DMA Code
DMA members must comply with the provisions of the DM Code.

Non–members are strongly advised to comply with the Code as it is a useful summary of the legal and best practice requirements for one-to-one marketers.

The Code is adjudicated by the Direct Marketing Commission (DMC).

The CAP Code
The British Code of Advertising, Sales Promotion and Direct Marketing (CAP Code), which is enforced by the Advertising Standards Authority (ASA).

PhonepayPlus
Regarding premium rate services and charging. Mobile marketers must comply with the Code of Practice and Guidelines issued by PhonepayPlus.

Regulatory organisation

The Information Commissioner's Office (ICO)
Regarding data protection and privacy issues.

Penalties

Penalties for compliance failure include fines for breaches of the DPA and PECR and sanctions under the various industry codes.

To find out the latest information on penalties and sanctions, including examples of companies that have been penalised, visit:

ico.org.uk

Business practice

Complaints and dispute resolution

Receiving complaints

- **Have complaints procedure in place**
  In our era of consumer power and activism, it is prudent that your brand should have practices in place to handle complaints and disputes that might arise as a result of your mobile marketing.

- **Define escalation processes**
  Have a plan in place to map out the escalation of a complaint in case your customer is dissatisfied with your initial response.

- **Aim for speedy resolution**
  Have policies and processes in place to ensure that any complaint you receive is resolved as quickly and smoothly as possible.

  Failure to do so may result in further or formal complaints being made against you – to the ICO, for example.

Dispute resolution

- **Be prepared**
  In the event that your communication includes either incorrect information or an incorrect offer, you must be prepared and able to make a strong, prompt decision about how to rectify any negative consequences.

- **Record proof of consent**
  Make sure that you have stored the date, source and permission statement of your customer's opt-in or soft opt-in consent and that your customer-facing staff are able to retrieve it easily, on demand.

  This will enable you to respond quickly and appropriately to direct complaints, or to provide evidence in the event that a complaint is made about unsolicited marketing.

Apology messages

- **Expect occasional mistakes**
  Despite all best efforts, mistakes can happen.

  For example, links may be incorrect, landing pages may not work or the wrong offer may be served.

- **Assess impact**
  Once a mistake has been made you need to assess the impact quickly.

  This is important to ensure your response is appropriate – both to those who were affected by the mistake and to those who were not.

  For example, if you have sent out a message with an inappropriate link, you will probably only need to apologise to those customers who actually clicked the link – rather than sending an unnecessary apology to your whole list.

- **Monitor consequences**
  Monitor the impact via your website visits, social media sentiment, inbound calls or by replies (if this is configured).

- **Assess factors**
  Consider elements such as:

Business practice

- How many customers have been affected?

- What is your brand reputational impact?

- What is the material impact?

- Is there a legal aspect to the error?

- Is a correction needed?

- Is a material apology needed (a voucher, for example)?

- **Is an apology necessary?**
  In some cases, if the mistake has minimal impact then sending an apology might be unnecessary or even a nuisance to your customer – and might merely draw unnecessary attention to the error.

- **Clarify decisions**
  If you do decide to send an apology, make sure that your decision is clear and explain to internal stakeholders why you are taking this action and your expected outcome.

- **Keep your apology on-brand**
  Make recommendations on tone of voice and keep your apology consistent with your brand.

- **Act speedily**
  Once your decision to send an apology has been approved, you should act quickly.

Adult content

The UK-based mobile network operators have created a joint code of practice for the self-regulation of new forms of content on mobile phones to address parental concerns about inappropriate or adult content being sent to children's devices.

The British Board of Film Classification (BBFC) provides the independent framework that underpins the Mobile Operators' code of practice, established in 2004, for the self regulation of new forms of content on mobile.

Such content must be placed behind access controls so that, when combined with age verification arrangements, it is only available to customers identified as 18 or over.

- Find the BBCF Mobile Classification Framework here:
  bbfc.co.uk/what-classification/mobile-content

- Download a copy of the Mobile Operators' code of practice here:
  mobilebroadbandgroup.com/documents/mbg_content_code_v2_100609.pdf

The following services are covered by the BBFC classification framework:

- Still pictures

- Video and audio-visual materials

- Mobile apps and games, including Java-based games

The following fall outside the BBFC remit but are governed by legislation as well as applicable codes of practice:

- Text, audio and voice-only services, including those delivered as a premium rate service and therefore regulated by PhonepayPlus

- Gambling services – which are already age-restricted by UK legislation

- Moderated and unmoderated chat rooms – since commercial unmoderated chat rooms must only be

accessible to those aged 18 or over

- Location-based services
- Content generated by consumers, including blogs
- Content accessed via the internet where the mobile operator is providing connectivity only

In general, any content should be classified as 18 if it falls within the following categories:

- Encouraging frequent and repetitive use of strong foul language
- Actual or realistic depictions of sexual activity, nudity
- Actual or realistic depictions of graphic violence, illegal drug taking, horror
- Activity that encourages imitation – for example, ear-claps or head-butts

It is intended that mobile operators will implement access control mechanisms via which they will verify age (ie 18 or over/under) and will block commercial content rated 18 or over from reaching the devices of consumers aged under 18.

Premium rate numbers

Premium rate services offer some form of content, product or service that is charged to your customer's mobile phone bill or is deducted from their pre-paid credit.

In the mobile world, such services include mobile phone ringtones, logo downloads, or subscription services such as a daily joke sent to a customer's device.

Such services are usually advertised on 090 codes and may also use short codes as a response mechanism that applies a premium rate charge to your customer's bill or pre-pay credit.

Your use of premium rate numbers and services is subject to the regulatory regime of PhonepayPlus, which regulates such services in their entirety – their content, promotion and overall operation – alongside existing legislation.

Campaign creation

Mobile strategy

In the recent past, a 'mobile strategy' has often begun and ended with an app – but it is vital to consider much more than this as the technology behind mobile web, mobile devices, network capabilities and programming for mobile has evolved rapidly to open up much more imaginative and effective customer experiences and journeys.

The key principle is always, as with all one-to-one marketing, to put your customer first. Make sure each decision contributes towards making your mobile communication as relevant to each individual customer as possible.

This requires you to thoroughly research and understand your audience – including what mobile devices they use, how they use them and what relevant activities they undertake. Consider the context of your customer's mobile usage – such as how they use mobile channels at home compared to when they are on the move.

Key concepts

- **Treat mobile as deeply personal**
  Almost every adult in the UK owns a phone that is always on and always with them.

  It is rarely shared and therefore represents the most personal of communication mechanisms.

- **Use most relevant delivery media**
  Make your choice of mobile delivery channel relevant to your specific offer or target group.

  For example, if your audience tends to prefer to use SMS then building an app obviously might not be an effective way to engage them, no matter how well an app might seem to fit with your campaign creative.

- **Deliver relevant messaging**
  Make your communication relevant to your customer not just in terms of the content, but also when and where it is received.

  For example, SMS is best saved for messages of less than 160 characters, whilst MMS can be used to provide visual cues. Just because you are able to use concatenation to combine up to four text messages, extending your SMS character limit, does not mean that you should.

- **Use mobile sensitively to build trust**
  For your customer to be willing to engage with your brand through mobile, they must trust your brand.

  There are two key customer concerns relating to trust:

  - How will their personal data be protected?

  - Will there be a financial cost to engage with your campaign?

  It is important that you reassure your customer and are explicit about these issues.

- **Focus on user experience**
  More than any other technology channel, a poor user experience through mobile will drive your customer away.

  At the same time, customer access to email, the web and social media is increasingly done through mobile.

  Be aware that your customer will be accessing such content through mobile and that you need to optimise their experience accordingly.

  This means not just considering screen size, but also the interaction method – such as touch-based devices.

- **Be clear about costs**
  If there is any cost to your customer, ensure that it is justified and it is clearly stated in your communication.

  For example, your customer will typically have to pay to send an SMS to a short code, which might fall outside their operator bundle. Make sure that any cost is both viable and of benefit to your customer.

Campaign creation

- **Perfect your mobile site first**
  Of all mobile channels, your mobile website is still the most straightforward and accessible – with fewer obstacles to your customer than accessing apps, SMS, NFC or other mobile channels.

  You are also likely to use your mobile site as a destination for other mobile marketing activity.

  So make your mobile site your priority, ensuring that it works smoothly and performs strongly, before investing heavily in other, supporting mobile channels.

- **Optimise emails for mobile**
  The majority of emails are now read on mobile devices – so it essential to ensure that your emails are optimised for this.

Mobile messaging

Mobile messaging in all its forms is a key activity in mobile marketing.

It is therefore essential to understand how to make sure your messaging is compliant.

Your obligations

- **Get permission**
  Ensure that your customer has given you permission to communicate with them via mobile.

- **Gather customer preferences**
  Give your customer the ability to manage their communications – including choice of channel (such as SMS or email), products, frequency and time of day.

- **Explain data usage**
  Be clear about your usage of your customer's personal data.

- **Identify your organisation**
  Ensure that your organisation's identity is clearly identified to your customer in all your communications.

- **Fit message to customer**
  Ensure that your use of mobile communications is appropriate to your offer and relevant to your customer – including delivering them an experience that suits their device, preferences, interests and values.

- **Explain technological requirements**
  If data access (apps and mobile internet) is required as part of your campaign (such as mobile web or apps), ensure that your customer understands that such downloads are reliant on the compatibility of their device and data connection.

- **Have clear privacy policy**
  Have a clear privacy policy as a good way to meet your legal requirements regarding the information you need to provide to your customer at sign up.

  Display a prominent link to this, on your mobile site or app.

  Within this, state what data about your customer you are collecting and/or storing – and how you intend to use it.

  See the *Privacy and data protection notices* section of the *Data guide* for further guidance.

Message frequency

Although messaging on mobile now takes a number of forms, from SMS to in-app messaging to IM, there are a number of broad principles that still apply:

- **Fit frequency to suit audience**
  There are no absolutes when it comes to choosing frequency of campaigns, but it is important to understand your target customer and be clear about how often they will receive messages.

- **Refine frequency to suit channel**
  Frequency of your campaign will also depend on your content and choice of media channel.

  Use 'test and learn' or A/B testing with sample data to find your optimal frequency.

- **Use customer preferences**
  Gather your customer's preferences to use alongside opt-out rates to find your optimum messaging frequency for each campaign.

Campaign creation

Reasonable hours

- **Respect reasonable hours**
  Best messaging times are between 8am and 8pm.

- **Avoid marketing on Sundays or holidays**
  Be aware that many customers will not welcome marketing messages on Sundays or on public or religious holidays.

  Understand your specific audience fully before messaging them and be considerate of their likely preferences.

- **Exception for service messages**
  The obvious exceptions here are *service* messages, not marketing communications, that are time-sensitive – for example, a flood alert.

- **Solicit customer preferences**
  Ask your customer for their preferences to help you find optimum times to send each campaign.

Mobile websites

Your customer's experience on your mobile website is crucial and will be different from your desktop web experience for a number of reasons.

Key concepts for mobile web

- **Integrate with other channels**
  Deliver harmonised brand integration and customer journeys between your mobile experience and other channels.

- **Explore new capabilities**
  Use improved mobile site capabilities to explore better design options, UX and functionality.

- **Integrate your mobile CMS**
  Integrate your mobile site with your main website CMS to deliver a 'write once, publish everywhere' solution.

  Use pre-set rules to restrict and direct publication of content to relevant platforms.

- **Develop mobile products for all**
  Consider all devices and operating systemss when delivering your mobile website.

  Although there are a number of ways to achieve this, aim to provide an optimal experience for each customer.

- **Value good mobile design and UX**
  As a general principle, poor design, aesthetics or any other element of your user experience will have detrimental effects on the success and ROI of your mobile site, as well as your brand reputation.

  Invest in expertise, make sure to research and strategise thoroughly and ensure sufficient design and build time to achieve the best possible results.

Mobile site user experience

- **Build responsive experiences**
  Deliver the best user experience by building your site on a responsive or adaptive platform.

  This approach also delivers you the business benefit of a single build project that works across all relevant devices.

Campaign creation

- **Learn from web analytics**
  Look at your website analytics to see how your customers access it using mobile devices – and to identify particular shortfalls, needs or opportunities specific to your mobile site visitors.

  Identify notable trends and predict how these will define your customers' needs over the lifetime of your mobile site.

  Use tools such as behavioural analytics to inform your design and optimise your customer journeys through your mobile channels.

- **Benchmark your industry**
  There is no standard level for mobile usage across all sectors, so conduct your own research to understand your specific audiences and industry expectations.

Mobile functionality

- **Exploit mobile functionality**
  Consider the specific opportunities offered by mobile functionality – such as location based services and mapping, click-to-call buttons and check-ins for coupons and social media.

  Use these to improve your customer's experience, engagement, sense of reward and readiness to buy.

- **Plan mobile customer journey**
  Mobile search is more likely to result in a customer action within an hour – such as a phone call, purchase or store visit – whereas desktop searches typically take several days to convert.

  So consider that mobile is typically used to fulfil your customer's immediate need – perhaps accessing information they need to know immediately – rather than forming part a longer, more considered research task.

  Prioritise your content, menu and navigation options accordingly.

- **Different interaction**
  Touch screens and scroll buttons. This means no mouse-overs or other mouse and keyboard functionality.

- **Consider different screen sizes and ratios**
  Mobile sites are typically much smaller and viewed in portrait format, rather than the landscape format used in the fixed web.

- **Identify different device capabilities**
  Unless you're building an experience for a very specific platform, thoroughly consider how your content will be accessed across ALL platforms before deciding on the best way to deliver it.

  Be aware that some mobile browsers do not support Flash content.

- **Test design across different devices**
  Thoroughly test your mobile experiences in a wide variety of common display formats before launching.

  Use one of the many free online 'responsive design testing' tools to see how your website will look on different screens.

Technical considerations

Mobile device and data network capabilities

- **Exploit network capabilities**
  Take advantage of improving cellular network capacity and speeds. The spread of 4G and the early stages of 5G continue to enable easier and more creative customer experiences on mobile devices.

Campaign creation

- **Still cater for older technologies**
  Make sure your site is still accessible to important customers on slower network connections.

  Page load times are critically important: if you serve large file sizes, or image-heavy pages, cellular networks will struggle to deliver such content quickly and your customer's experience will suffer.

- **Accommodate slow connections**
  Do not assume that 3G or 4G makes these problems irrelevant – if a network cell gets particularly busy, its capacity degrades quickly.

  You only have to try accessing a web page on a busy central city platform at 5pm to see how slow a web connection can get.

- **Keep data requirements low**
  Although around 40% of mobile users have a price plan that includes data access, not everyone will have 'unlimited' data usage and so may incur charges they do not want to pay if they access your data-heavy content.

- **Flag up costs**
  Always make your customer aware of any potential charges to use your mobile site.

- **Pre-pay data for your customer**
  Where access to your mobile site is prompted by a free channel, such as a link in an SMS, it is recommended that your organisation pre-pays the data and zero-rates it for your customer.

- **Keep data light**
  Best practice is to keep to <100kb file size per page. If it takes more than 30 seconds to load the page you could lose your customer to your competitor.

HTML5

As mobile devices have evolved over the past few years, so a new website coding standard has evolved.

HTML is being superseded by HTML5 – an evolution of coding language which, among other features, increasingly allows your mobile website to include functions that previously required a specialist app, as well as hard-coded functions of your customer's mobile device (such as the camera).

HTML5 offers you a whole array of new opportunities to create smoother, more engaging, more sophisticated and more controllable brand experiences via mobile channels.

Apps

Apps are additional software added to a mobile device. They can make use of any of the device's functionality – such as the camera, location tracking, light – or piggyback on existing software, such as a map or camera-operating programme.

- **Access**
  Apps may be accessed either through app stores, or by direct download to devices.

- **Targeted experiences**
  Apps are an opportunity to create highly targeted, functional brand experiences for your customer.

- **Usefulness**
  The most successful apps tend to be either addictive games or genuinely useful tools, providing your customer with a useful service that helps them in a particular task – for example, apps that help your pick the quickest route home; or allow you to stream music; or pay a transaction more easily using NFC.

Campaign creation

- **Parallels with mobile web**
  There are some similar considerations with the mobile web in delivering optimal campaigns – indeed, many apps could now be replaced with an HTML5 website.

- **Offline functionality**
  Because apps are pieces of software downloaded onto your customer's phone, they do not necessarily need an internet connection to work.

  This makes an app a great way to supplement the phone with additional functionality that often complements the device's inbuilt functionality – for example, a torch, a spirit level, a game or a map of a particular city.

Strategy

- **Have very clear, credible goals**
  Mobile apps are just another medium – and, as such, equally live or die depending on their relevance and usefulness to your customer.

  There are already millions of apps across all mobile operating platforms, of which a large proportion are never or rarely used and only a few are truly successful.

  Clarify realistic goals that complement your business goals and other marketing strategy before approaching an app agency – otherwise you will not be able to fully benefit from their time and expertise and could end up with an expensive failure.

- **Rationalise best solution**
  Do not feel tied to one particular option – you may find different customer needs and business tasks are better suited to different tools.

  For example, your mobile website might work better for acquisition whilst your apps facilitate CRM, loyalty and customer retention.

- **Understand HTML5 functionality**
  Think about whether an HTML5 mobile website can give you the functionality design of an app.

- **Plan versatile solution**
  Make sure your site or app is accessible to everyone without having to re-build the app for different platforms.

- **Cater for all platforms**
  The UK has about 62% smartphone penetration (Source: Google's *Our Mobile Planet*, April 2014) but, as with any marketing task, you need to understand your particular audience demographics and phone profiles.

  Apple devices currently account for around 28% of smartphones; Android devices nearly 50%. Windows and BlackBerry devices are also still important.

  So if you're creating an app, do not just deliver a knee-jerk 'iTunes' app – carefully consider how your key audiences will be able to access it.

Campaign creation

App or mobile site?

App	HTML5 site
Pros	Pros
• Adds a specific product or service to your customer's phone functionality • Works offline – does not have to require internet connection • Customers love good apps – those that fill a genuine need and are reliable, well-designed and easy to use • Can be a powerful brand portal • Can deliver special experiences and functionality, such as games or tools • Can retain and use information without requiring your customer to create and log into an account – for example, to track a diet, build up an illustration over time or only receive information relevant to them • Allows push messaging • Good for CRM, loyalty, retention	• Is often a broader brand world • Mobile site can be built as part of a main website build • Does not require a download • Instantly accessible to all customers • Does not require your customer to update app • Web analytics • Analytics integrated with other digital channels • Good for acquisition
Cons	Cons
• Requires dedicated build • Trickier to update or evolve • Most apps are never used or used only once • Only accessible on smartphones and on specific platforms (eg Apple versus Android)	• Cannot send push messages • Cannot operate offline • Not as front-of-mind as having an app icon constantly visible on your customer's device

App vendor review processes

- **Allow for review processes**
  Each app store has its particular review process so bear this in mind when planning the build and launch schedule for your app.

  Some stores may review all content, code and functionality before releasing the app; other stores are less rigorous.

Charges to consumers

- **Flag up costs**
  Although costs of paid apps are clearly shown in app stores, you must clearly flag up other potential costs, such as data charges, to your customer.

- **Explain data usage requirements**
  Where a data connection is required for your app or mobile web, there may be additional costs to your customer to access this information. Ensure that it is justified and is clear in the communication.

Campaign creation

App cookies and tracking

- **Gain consent to use cookies**
  It is your legal obligation to gain consent from your site visitors before you place cookies on their devices – and this applies to apps and mobile websites as much as desktop websites.
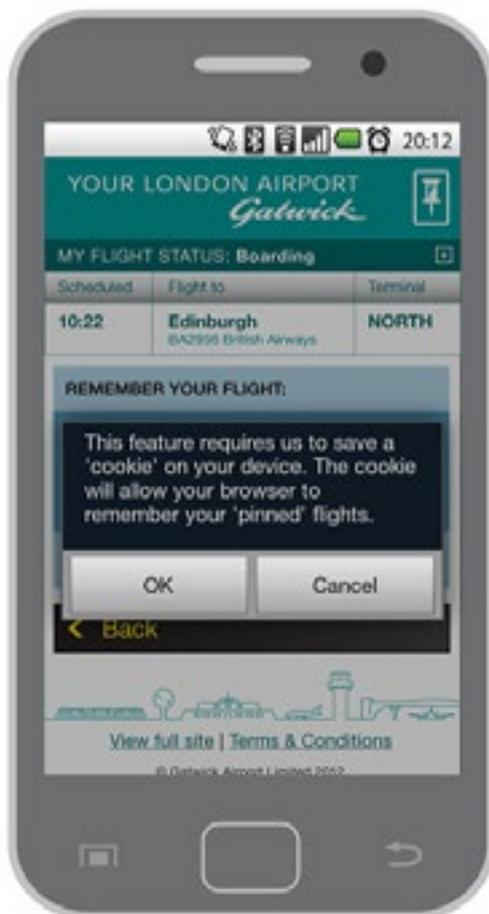
- **Disclose tracking files**
  Similarly, you must also disclose any other tracking files similar to cookies to your customer – and you must adhere to the relevant legal requirements regarding your customer's consent.

- **Include link to privacy policy**
  Most apps capture and process personal data – and therefore should include a link to a suitable privacy policy and provide all appropriate opt-in or opt-out opportunities.

- **Example notification of use of cookies:**

- **Further information**
  See DMA guide *Mobile and cookies legislation:*

  www.dma.org.uk/toolkit/how-guide-mobile-and-cookies-legislation

Campaign creation

Using device functions within apps

- **Explore device functionality**
  Apps may access a broad variety of device functions – from internet data connections to the device's camera, microphone and location services.

- **Notify customer about functionality**
  While some device operating systems will notify your customer of which functions or services on their phone will be accessed, not all systems give this information.

- **Explain functionality**
  It is important that you provide clarity to your customer regarding what functions of their device will be accessed – and the reasons for that access.

  Provide this information and your privacy policy in your app – or a link to a mobile site containing this information – and outline the important points on your app download page.

In-app messaging

- **Use push messaging**
  If the primary function of your app is to drive retention and loyalty, you will want to draw your customer's attention to new features and functionality in your app so that you keep them interested and engaged.

  App messaging, also referred to as 'push' messaging, is one way to do this – and looks much like an SMS with a link to a website.

- **Message selectively**
  Be mindful to not overwhelm you customer with messages – so make the same considerations for frequency and timings that are outlined in the *Message frequency* section of this guide.

Web apps

Web apps are essentially mobile sites with an app wrapper for the relevant device operating system.

These offer convenience to both your brand and your customer by allowing easy distribution through app stores and a brand icon that can be shown on your customer's mobile phone.

The same best practice principles apply to web apps as apply to mobile web and mobile apps, above.

Mobile network data usage

Aside from the data connection required to download the app, once installed on the phone it may also require a network data connection.

- **Optimise app**
  Take care to ensure that apps are optimum size – use only the necessary data required for the app to perform correctly.

- **Evaluate data-heavy features**
  It is possible to include detailed analytics software in your app, but these are often data heavy. Consider whether this amount of data is acceptable within your app.

Campaign creation

Proximity marketing

What is proximity marketing?

Proximity marketing offers you unique opportunities to provide rich content to your customer in a location-specific area – but without the cost and complexity of the mobile networks' SMS and MMS technology.

Location-based mobile marketing

With increasing penetration of GPS-enabled smartphones, location-based mobile marketing is taking a higher degree of prominence.

Take full advantage of the opportunities and importance of location in developing a successful campaign and understand the data and privacy issues for your customer.

- **Get consent**
  In particular:

    - Get specific opt-in consent to use location-based mobile marketing

    - Prompt your customer to reaffirm their consent at least once per year

    - Provide a very easy way to allow your customer to opt out at any time, without negative consequences

    - Location services should be OFF by default

- **SMS location lookup**
  By texting you for SMS location tracking, your customer gives implicit permission for you to identify their location (on a one-time basis) in order to provide them with relevant information – for example, nearby shops, taxis or other services.

- **App-based**
  App-based services like Groupon® and FourSquare® allow your customer to 'check in' at your location – publicising their presence and opting-in to receive related promotional offers from your brand.

- **Click-to-call buttons**
  Click-to-call buttons become very useful when you have location information.

  For your on-the-go and ready-to-buy local customer, a location-specific business phone number can mean the difference between buying from you or heading to the nearest competitor.

  For example, as a pizza chain you would want to ensure that your customer can instantly see your nearest restaurant instead of one across town.

Near Field Communications (NFC)

NFC works using a chip embedded in your customer's mobile device and a similar chip in a till or information point.

The most successful and common use of NFC is the TfL Oyster card®. Pre-loaded with funds or season ticket authorisation to pay for Tube, train or bus journeys, customers simply touch their card on the sensor to activate the entry gates.

The same mechanics can be employed to transfer money electronically – a service various credit cards now offer – or even to access content. For example, your customer could touch their phone on an information panel in a car showroom to activate a promotional video download and a 'request a test drive' form.

Campaign creation

Bluetooth

- **Gain consent**
  Although Bluetooth is not considered to fall within the definition of electronic mail under the current PECR, in practice you should consider it to fall within the definition and obtain positive consent before using it.

- **Understand obstacles**
  Bluetooth can be problematic. Your customer must have their device set to 'active' and 'discoverable' to be located by your Bluetooth device – and be within close proximity in order to pair with it and share content.

- **Emerging alternatives**
  Recent technological innovations are replicating the functionality and marketing capabilities of Bluetooth, and are hoping to overcome the user-knowledge issues to make all of this work.

Quick Response (QR) codes

QR is one of a number of different technologies that use evolved, two-dimensional barcodes. By adding a y-axis to the code, much more information can be transferred – such as personalised tracking tokens.

- **Be realistic about customer engagement**
  Difficulties with QR codes are mainly focused around the need for your customer to:

  - Have already downloaded an app that can read QR codes – or, if not, to make the effort to look up and download one

  - Actually make the effort to scan the code and see what's there

- **Be creative**
  The data within a code can be whatever you wish – although typically it is a link to a website.

- **Develop efficient customer journey**
  Use QR to deliver quicker access straight to a deep page link on an advert, or mail shot.

  For example, you might use a QR code on a clothing advert to send your customer straight to the relevant product page – saving them the time, trouble and frustration of having to search for it manually.

- **Optimise destination for mobile**
  Make sure that any page you link to is optimised for mobile.

- **Simplify URL**
  When creating QR barcodes, make the URL as simple as possible. Long and complicated codes end up with large and complicated patterns that can cause issues being read by code-reading apps.

- **Avoid public URL shorteners**
  If you use a publicly available URL shortener (such as Bit.ly, the most common) it is very simple for anyone to see exactly how many customers have visited your URL.

  Agencies are beginning to deliver code generation tools that include proprietary, and therefore private, URL shorteners allowing you to embed complicated tracking tokens, but display a simple barcode.

- **Research latest developments**
  Image recognition tools are evolving as well, which allow your customer to scan a picture, rather than a QR barcode, to deliver the same content or link.

Campaign creation

Augmented Reality (AR)

AR uses image recognition as a way of accessing enhanced content, typically pre-loaded into your purpose-built AR app or pulled from the mobile web.

For example, opening the app and pointing your camera at a specific (highlighted) area of an advert, leaflet, museum exhibit or other object can trigger further content to appear on your customer's device. In this way a still image can 'come to life' by triggering a video pre-loaded into your AR app; or you can overlay your packaging with interactive content, such as hotspots.

Another example application for AR is to enable a customer to see properties for sale or let in a particular street – simply holding the app up and pointing at houses in a street could activate tags above those available, leading you to view images, videos and other particulars of the property – and to then request a physical viewing with the estate agent responsible.

A very specific, usually bespoke app is required to view AR content as it still developed bespoke. International technical expectations, standards and specifications are not yet defined.

- **Be creative with printed collateral**
  Creative AR functionality can be triggered through images or tags on printed materials, such as flyers, direct mail shots, press adverts, billboards, tickets, product packaging, manuals and so on.

- **Imagine possibilities**
  Even your product itself can be used as an AR trigger image – so be creative and brave with possible one-to-one marketing opportunities that AR could give you.

  For example, you might be able to use AR in your product packaging to upsell accessories or long-term services at the very moment your customer is excitedly unwrapping and exploring their new purchase.

- **Get necessary permissions**
  The use of location data requires consent under PECR.

  Also consider carefully whether the technologies you deploy will involve processing your customer's personal data – and ensure that you comply with relevant data protection legislation.

- **Consider intellectual property issues**
  If you use someone else's intellectual property as a trigger for your AR app – for example, a bank note or another organisation's logo – then you might run into issues concerning intellectual property rights.

  Always seek specific legal advice on this aspect before launching an AR campaign.

Emerging proximity marketing channels

As mobile and tablets continue to develop we are bound to see the emergence of other proximity marketing media.

Conduct your own regular research to keep abreast of emerging mobile technologies.

Data

Consent

Unless the soft opt-in principle applies, your customer must have given their positive consent in order to receive your mobile marketing communications.

The onus is on you to ensure that appropriate consent has been obtained before communications are sent.

Full information on the collection and management of data can be found in the *Data guide*.

The key points for mobile marketing include:

- **Obtain consent**
  Obtain your customer's consent to send unsolicited commercial mobile messages – for example, with the use of an opt-in check box, unless the soft opt-in exception applies (see below).

- **Do not pre-tick consent**
  You should not provide a pre-ticked opt-in box for consent purposes.

- **Only collect necessary data**
  Only ask for information that is reasonable and necessary for the purpose for which you intend to use your customer's data.

- **Highlight third parties**
  You must clearly notify your customer if your marketing messages may contain information about other companies' products or services – and obtain specific opt-in consent for this.

- **Clearly link to privacy policy**
  Display a clear notice providing all requisite data protection notices and a link to, or full details of, a suitable privacy policy at your point of data collection.

- **Honour your privacy policy**
  Comply fully with the requirements of your data protection notices and privacy policy.

Soft opt-in consent

Soft opt-in consent only applies to SMS (and email) marketing and must satisfy the following conditions:

- **Existing customer**
  You have previously obtained your customer's contact details in the course of their purchase or negotiations to purchase your product or service.

- **Relevance**
  Your communications relate to similar goods or services to those that your customer has already bought.

- **Clear stated purpose**
  You must have advised your customer at their point of sign up that you will send mobile marketing messages to them unless they object.

- **Clear opt-out at sign-up**
  You must have provided your customer, at their point of sign up, with a simple means to opt out of your one-to-one marketing – without charge or prejudice.

  Simply sending them a marketing message containing an opt-out mechanism as the first point of objection does not comply with legal requirements.

Campaign creation

- **Simple opt-out repeated**
  Each subsequent message to your customer must include a simple means to opt out of your future one-to-one mobile marketing communications.

- **Be careful using soft opt-in**
  It is important that you understand and consider your customer's expectation. Although a soft opt-in may be within the law, your customer may not expect or welcome marketing communications from your organisation on their mobile.

- **Full opt-in recommended**
  Wherever possible, it is recommended that you seek an explicit opt-in from your customer.

Opt-out

- **Right to opt-out**
  Any consumer has the right, at any time and by written notice to your organisation, to ask you to cease, or not to begin, processing their personal information for the purposes of one-to-one marketing.

- **Applies to ALL marketing**
  Data protection legislation states that this right relates to marketing "by whatever means" – so covers all forms of mobile marketing, just as it does all other one-to-one marketing channels.

- **Make opt-out easy**
  It is best practice to enable your recipient to object to future one-to-one marketing with the minimum effort and cost possible.

Unsubscribe requests

- **Keep your unsubscribe process simple**
  Make the unsubscribe process as simple as possible – the alternative is that a frustrated consumer may make a complaint against you.

- **Provide a preference centre**
  Your customer may choose to alter their subscription, content, timing or frequency preferences instead of unsubscribing from your marketing completely, so make sure you offer a preference centre – especially at the points of sign-up and unsubscription.

  Use your preference centre to collect useful insight into why your customer wants to alter their status or preferences.

- **Benchmark unsubscribe rates**
  Measure the rate at which customers are unsubscribing and, where possible, compare this to either historical trends or published industry benchmarks.

  If your unsubscribe metrics are increasing or are out of line with expectation, look to find out why.

  This is where having a preference centre with a questionnaire can provide valuable feedback.

- **Ensure hygiene consistency**
  If your organisation uses multiple data systems, take care to ensure that data hygiene and changes are reflected consistently across all of these – for example, between CRM database and broadcast platform systems.

- **Monitor unsubscribes received through other channels**
  If a customer use a different channel to request to opt-out of your mobile marketing, make sure this is still correctly flagged in your databases and that the change is reflected within your sending systems.

- **Honour unsubscribe requests promptly**
  Provided that you honour unsubscribe requests in a timely fashion, complaints should not be a regular occurrence.

Campaign creation

- **Have manual unsubscribe process**
  Have a process in place to manually unsubscribe a consumer who opts-out of your mobile marketing.

- **Maintain suppression list**
  Keep a suppression list of unsubscribers to ensure that they are not re-added to your database.

Short code opt-out

- **Use short codes for mobile opt-out**
  You are permitted to use a short code as a valid address for marketing communication opt-out/unsubscribe requests.

If you do use a short code for this purpose, you must ensure that:

- **Identify your organisation**
  Your identity, as the sender, is clearly identified within the message.

- **Minimise charges**
  Your customer's use of any such short code does not incur a premium rate charge.

- **Ensure short code is working**
  Your short code is valid at the time your SMS is sent.

- **Explain short code**
  You inform your customer of the short code in the body of your marketing message – for example:

  > "2 STOP MSGS TXT 'STOP' TO xxxxx [add applicable 5 digit short code]"

- **Honour INTENTION to opt-out**
  Even where your customer has not strictly followed your unsubscribe instructions (for example replying with "unsubscribe" instead of "STOP"), they have indicated that they no longer want to receive messages and you must unsubscribe them from your mobile communications.

- **Offer specific campaign opt-out**
  Your customer may only wish to opt out of communications relating to a particular campaign, rather than ALL of your brand's marketing messages. Include a specific campaign keyword or reference in your opt-out message to offer this option. This way you may still be able to send your customer valued messages as part of other campaigns.

Privacy and data protection notices

When collecting personal data, such as a mobile number, you must prominently display a data protection notice at your point of data collection.

- **Privacy policy guidance**
  Follow the general privacy policy guidance in the *Data guide*.

- **Include link to privacy policy at sign-up**
  You must include a privacy policy whenever you ask your customer for their personal informantion.

  Since it may well be impractical to include this full policy on a mobile communication, it is permitted to include a link to it from your communication.

- **Make it prominent**
  Make your privacy policy accessible in one click by way of a prominently flagged link above your submit button.

  Do not put this link amongst various other general links to terms and conditions, or in a sidebar, or only visible after scrolling to the bottom of your web page.

Campaign creation

- **Link from each communication**
  Your privacy policy should also be clearly accessible via a link from every communication.

- **Optimise for mobile**
  Optimise your privacy policy for readability on mobile devices.

Cookies and other tracking files

- **Check latest regulation**
  For detailed advice on compliance with cookie legislation, see the DMA's *How-to guide: mobile and cookies legislation* from:

  www.dma.org.uk/toolkit/how-guide-mobile-and-cookies-legislation

Campaign response

Metrics and reporting

Strategy

- **Use metrics to measure campaigns**
  Metrics are a powerful tool in your understanding of how, when and why your mobile marketing is performing.

- **Align metrics to goals**
  There are many metrics available and it is important to choose the right ones in order to keep your mobile marketing aligned to your business objectives and other marketing activity.

  Choosing the wrong metrics can cloud rather than inform your understanding of how a campaign is performing – and be a costly and potentially irretrievable error to discover after your campaign has launched.

- **Measure for trust and reputation**
  Do not be misled into judging your success on simple 'Likes' and followers – these can be bought easily and cheaply, regardless of how relevant your marketing is, and could just represent an expensive audience of poor prospects.

  Instead, identify metrics – particularly over the longer term – that will give you a true sense of your standing with your target audiences. Do they engage with you beyond your marketing? Do they look to your brand as an authority in your sector? Do they come back more than once? Do they advocate you to others?

- **Use metrics to understand customer attitudes**
  Mobile is relatively new, fast-changing and deeply personal to each individual customer.

  It can give your marketing real impetus and competitive advantage if you correctly gauge how each of your specific audiences views their mobile with regard to marketing.

  Identify metrics that you can track over time to know how to pitch your mobile marketing on almost a month-by-month basis.

  Metrics that could inform your strategy include response rates, unsubscribes and the proportion (and specific segments) of your website visitors accessing your site on mobile devices.

- **Build analytics in at planning stage**
  Make sure you carefully consider all options and build these measurements into your campaign from the planning stage.

  If you try to include analytics later on, it may be too late to build them into your systems effectively or efficiently and could undermine your efforts to understand your marketing.

- **Assess each channel fairly and objectively**
  If a campaign is not working, do not automatically discredit the channel as ineffective for your needs – there may be separate factors, for example around creative or deliverability issues, that have undermined your campaign performance.

  The success of marketing on ANY channel is dependent on many factors – including relevence of your message to the channel, your creative idea, timing of your campaign, your audience and the quality of your campaign execution.

- **Measure ongoing performance**
  Measure ongoing performance, not just isolated campaigns.

  Individual campaigns may well perform unusually strongly or weakly, often for no clear reason, so it is vital to track performance over all channels on an ongoing basis.

  Only this way will you be able to identify the significant moments or general trends in your marketing that can underpin your successful future business and campaign strategies.

Campaign response

- **Assign your analytics expert**
  No matter how small your organisation, it almost certainly will be invaluable to nominate one person to 'own' your analytics.

  Give them the time and necessary resource to truly understand what analytics are available and appropriate, and charge them with the responsibility to monitor your business and campaign performance and to make meaningful reports to key stakeholders that can lead to performance uplifts.

Setting metrics for measurement and reporting

- **Define your standards**
  Mobile has the potential to be the most measurable of all marketing channels, as you can collect all the analytics of online channels, plus location and data from device functions.

  However, there are currently few agreed standards for measurement of mobile advertising – something that is causing confusion within the industry and hindering progress in the development and use of mobile analytics.

  Define your own standards against your business goals and keep up to date with the latest industry advice.

- **Understand all available analytics**
  Analytics for websites, apps and messaging are increasingly sophisticated and can provide useful and accurate campaign information.

  Understand, at least at a top level, what different types of analytics actually indicate and when to use them.

- **Check different service providers**
  Different service providers will offer different metrics and levels of metrics.

- **Monitor in real-time**
  Mobile has the benefit of immediacy, much like email and the internet, with the ability to view the campaign actions in a very short time-scale.

- **Learn quickly**
  Analyse the effectiveness of your campaign immediately to make accurate and timely decisions on subsequent campaign content and targeting.

- **Research best reporting tools**
  Reports can be produced in a number of ways, including via online reporting tools, bespoke reporting applications and simple Excel spreadsheets.

Delivery metrics

SMS and MMS metrics

- Number of messages sent
- Number delivered
- Number of bounces
- Number of opens
- Number of replies
- Number of click-throughs
- Number of stop messages

Campaign response

Where promotion of downloads is promoted via SMS, metrics can show:

- Number of links clicked
- Associated metrics, such as:
    - Pieces of content purchased
    - Value of content purchased

Mobile web

This will use similar analytics to those for the fixed web – but additional factors can also be measured, such as:

- Location
- Device type

Both of these are important in improving your campaign targeting and customer experience.

Mobile apps

There are some similar measurements to the mobile web, but additional important metrics include:

- App downloads
- App opening rates
- Frequency rates

Take care with app metrics to only measure what is necessary or it may generate large, unexpected data usage for your customer.