

Master of Science in Marketing

Postgraduate Research Dissertation · Module MGT5442P

How Can SMEs Balance Privacy and Performance to Achieve Effective Personalised Marketing Under GDPR?

An empirical qualitative investigation into organisational privacy calculus, consent trade-offs, attribution realities, and first-party data architecture in UK B2B small and medium enterprises.

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Abstract

This dissertation examined how B2B SMEs based in the UK can balance personalised marketing with GDPR privacy requirements. Earlier research explains privacy, trust, consent, and regulation, but gives limited practical guidance for resource-constrained SMEs.

The study used semi-structured interviews with UK-based B2B SME marketing decision-makers and analysed the data using thematic analysis. Four common themes appeared in the interviews.. First, managers judged success of their personalised marketing campaigns on a case by case basis, considering whether personalisation could continue without creating too much cost, distrust, or governance difficulty. Second, GDPR acted as a strategic filter that shaped data collection, consent wording, and acceptable targeting choices before campaigns went live. Third, small teams, limited time, long B2B sales cycles, and partner or tool integration work pushed managers toward selective enforcement and practical trade-offs. Fourth, day-to-day governance was often carried out through platform defaults and vendor workflows rather than fully custom systems.

Overall, the findings suggest that effective personalisation in SMEs depends on clear consent choices, narrower targeting, manageable governance routines, and ongoing monitoring of complaints, opt-outs, unsubscribe patterns, and audit confidence. This study makes two contributions to the existing literature. First, it provides empirical research from UK B2B SME marketing decision-makers on how GDPR compliance is managed as a practical, resource-constrained operational challenge rather than a purely legal one. Second, it introduces a practice-based account of consent architecture, data minimisation, and governance routines as the mechanisms through which SMEs achieve sustainable personalised marketing under GDPR extending privacy calculus and procedural fairness frameworks into an under-studied organisational context.

Glossary

AI: Artificial intelligence refers to computer systems that can do tasks that usually need human judgement, such as spotting patterns, learning from data, or making predictions (Gao et al., 2023). In marketing, AI can help decide what content to show, when to send it, or which audience is most relevant. In this dissertation, AI matters because it can improve personalisation but also raises questions about data use and GDPR.

B2B: B2B stands for business-to-business. It describes organisations that sell products or services to other organisations rather than directly to individual customers (Resnick et al., 2016). In this dissertation, B2B matters because these organisations often rely on longer sales cycles, relationship building, and trust-based communication.

B2C: B2C stands for business-to-consumer. It describes organisations that sell directly to individual customers. It is included here because B2C marketing often works differently from B2B marketing, especially in relation to speed of purchase, scale, and the way personal data are used.

Choice architecture: Choice architecture means the way options are presented when people make decisions (Utz et al., 2019). Small design decisions, such as wording, button order, or colour emphasis, can shape what people choose. In consent settings, this matters because poor design can push users toward choices they do not fully understand.

CMP: CMP stands for consent management platform. It is a tool that helps an organisation collect, record, and manage people's consent choices for cookies, tracking, and other data uses (Kretschmer et al., 2021). For SMEs, a CMP can make day-to-day GDPR compliance easier, but the platform's default settings can also shape how consent works in practice.

Cold-start problem: The cold-start problem happens when a system has too little data about a new user or a new item to make useful recommendations (Adomavicius & Tuzhilin, 2005). In simple terms, the system cannot personalise well because it has not learned enough yet. This matters for SMEs because smaller organisations often have less data to work with in the first place.

Collaborative filtering: Collaborative filtering is a way of making recommendations by looking for patterns across similar users (Adomavicius & Tuzhilin, 2005). If two users behave in similar ways, the system may recommend to one user what the other user liked. This can improve personalisation, but it also depends on having enough user data to find reliable patterns.

Confirmability: Confirmability means showing that the findings come from the data rather than from the researcher's personal opinions (Braun & Clarke, 2006; Nowell et al., 2017). In qualitative research, this is supported by clear documentation of coding decisions, theme development, and reflexive notes. In this dissertation, confirmability matters because the findings are based on interview interpretation.

Consent requests: Consent requests are the messages, banners, or prompts that ask users for permission to collect or use their personal data (EU Regulation 2016/679; Utz et al., 2019). They often appear when a user visits a website or signs up for marketing communication. Under GDPR, they need to be clear, specific, and based on a real choice.

Consent design: Consent design means how consent requests are written and displayed (Utz et al., 2019; Kretschmer et al., 2021). This includes the wording, layout, colour, button labels, and the way options are grouped. Good consent design helps people understand what they are agreeing to and supports fairer data use.

Consent choices: Consent choices are the options a user can select when responding to a consent request, such as accept, reject, or manage preferences (Leszczynska & Baltag, 2024; Utz et al., 2019). These choices matter because they determine what data an organisation can lawfully use. Clear consent choices also support trust and transparency.

Consent management: Consent management is the process of recording, updating, and respecting users' consent decisions over time (Voigt & von dem Bussche, 2024; Kretschmer et al., 2021). This includes keeping track of when consent was given, what it covered, and whether it was later withdrawn. For SMEs, good consent management helps avoid using data in ways that no longer match user permission.

Content-based filtering: Content-based filtering is a recommendation approach that suggests items based on what a user has already shown interest in (Adomavicius & Tuzhilin, 2005). For example, if someone reads several articles on one topic, the system may recommend similar articles. This can be useful for SMEs because it relies more on a person's own behaviour than on large amounts of other-user data.

Cookie banner: A cookie banner is a notice shown on a website or app that asks users about cookies and other tracking technologies (Kretschmer et al., 2021). It should explain what is being collected and why, and it should let users manage their choices. In this dissertation, cookie banners matter because they sit at the point where compliance and marketing performance meet.

Credibility: Credibility refers to how believable and trustworthy the research findings are (Braun & Clarke, 2006; Nowell et al., 2017). In qualitative research, credibility is strengthened when the questions are well designed, participants give concrete examples, and the analysis is clearly grounded in what they said. It is similar to the idea of validity in other forms of research.

CRM: CRM stands for customer relationship management. A CRM system helps organisations store and organise information about customers, leads, and interactions across channels such as email, websites, and sales activity. In this dissertation, CRM systems matter because they often sit at the centre of consent, targeting, and campaign workflows.

Data governance: Data governance means the rules, roles, and controls an organisation uses to manage data properly (Brodin, 2019; Voigt & von dem Bussche, 2024). It covers questions such as what data are collected, who can access them, how long they are kept, and how they are used. Strong data governance helps an SME balance useful marketing activity with privacy protection.

Data minimisation: Data minimisation is a GDPR principle that says organisations should collect and use only the personal data they actually need for a clear purpose (EU Regulation 2016/679, Art.5(1)(c); Biega et al., 2020). It is meant to reduce unnecessary data use and limit privacy risk. In personalised marketing, this can create a trade-off because using less data may also reduce targeting precision.

Dependability: Dependability means showing that the research process was logical, traceable, and consistent (Braun & Clarke, 2006; Nowell et al., 2017). This does not mean that the findings must be mechanically identical every time, but rather that another reader should be able to follow how the conclusions were reached. Audit trails and process notes help support dependability.

First-party data: First-party data is data an organisation collects directly through its own channels, such as its website, CRM, forms, or email activity (Miller et al., 2025). It is usually seen as more reliable and less risky than

third-party data because the relationship with the user is more direct. In this dissertation, first-party data is important because many SMEs rely on it after GDPR tightened wider tracking practices.

GDPR: GDPR stands for the General Data Protection Regulation. It is the legal framework that sets rules for how personal data should be collected, used, stored, and protected (EU Regulation 2016/679; Voigt & von dem Bussche, 2024). In this dissertation, GDPR matters because it shapes what SMEs can do when trying to personalise marketing in lawful and trustworthy ways.

Hybrid filtering: Hybrid filtering is a recommendation method that combines content-based filtering and collaborative filtering (Adomavicius & Tuzhilin, 2005). In simple terms, it uses both a person's own behaviour and wider user patterns to improve relevance. It is included here as technical background for personalisation systems, even though this dissertation focuses mainly on managerial decisions rather than algorithm design.

IUIPC: IUIPC stands for Internet Users' Information Privacy Concerns. It is a framework used to understand how worried people are about online data collection, awareness, and control (Malhotra et al., 2004). In this dissertation, it helps explain why some users may be cautious about sharing data for personalised marketing.

Personalisation: Personalisation means tailoring content, timing, offers, or digital experiences to make them more relevant to a person (Cavdar Aksoy et al., 2021; Bleier & Eisenbeiss, 2015). It can be based on behaviour, preferences, role, or signs of intent. In this dissertation, personalisation is treated as useful but only sustainable when it is balanced with privacy, trust, and governance.

Personalised marketing: Personalised marketing is the use of customer or prospect data to adapt marketing messages, timing, offers, or journeys (McKee et al., 2025; Vishwakarma et al., 2025). This can include targeted emails, dynamic website content, or role-based campaign flows. In this dissertation, the key issue is not whether personalisation works in theory, but how SMEs can do it in practice under GDPR.

Privacy calculus: Privacy calculus is the idea that people weigh expected benefits against expected risks when deciding whether to share personal data (Dinev & Hart, 2006). For example, a user may share data if they think the benefit is worth it, but refuse if the request feels too intrusive. This concept helps explain why disclosure is often conditional rather than automatic.

Procedural fairness: Procedural fairness means whether people feel an organisation's data practices are fair, respectful, and transparent (Culnan & Armstrong, 1999). When users believe the process is fair, they are more likely to trust the organisation. In this dissertation, procedural fairness helps explain why the way consent and data use are handled matters as much as the marketing message itself.

Purposive sampling: Purposive sampling is a way of selecting participants because they are especially relevant to the research question (Braun & Clarke, 2006). Instead of choosing people randomly, the researcher chooses people who can provide useful, informed insight. In this dissertation, that means selecting UK-based B2B SME decision-makers who can speak directly about marketing and data practices.

Recommender system: A recommender system is a system that suggests products, services, or content based on data patterns (Adomavicius & Tuzhilin, 2005). Common examples include product suggestions on websites or content recommendations in apps. In this dissertation, recommender systems are background context for personalisation rather than the main object of study.

Semi-structured interview: A semi-structured interview is a qualitative method that uses a prepared set of guiding questions but still allows the interviewer to follow up on useful points (Braun & Clarke, 2006). This makes it possible to compare interviews while still exploring detail and context. It suits this dissertation because the study is interested in how managers explain real decisions and trade-offs.

Sessions: Sessions are single periods of activity in which a user interacts with a website or digital platform before leaving or becoming inactive (Miller et al., 2025). During a session, organisations may observe actions such as page views, clicks, downloads, or time spent. Sessions matter in personalised marketing because they are often used to infer interest, but their use still has to be lawful and transparent under GDPR.

SME: SME stands for small and medium-sized enterprise. In a UK and EU context, this usually refers to organisations with fewer than 250 employees, although exact definitions can vary (Brodin, 2019). In this dissertation, SMEs matter because they often have fewer people, less time, and less specialist support than larger organisations.

Sparsity: Sparsity means that a dataset has many gaps or very limited information (Adomavicius & Tuzhilin, 2005). In recommendation systems, this makes it harder to detect useful patterns because there are fewer interactions to learn from. For SMEs, sparsity can be a practical problem because smaller organisations often have smaller customer bases and less historical data.

Targeting: Targeting means selecting a specific audience segment to receive a particular marketing message or offer (Gao et al., 2023; Bleier & Eisenbeiss, 2015). Good targeting aims to make communication more relevant and efficient. Under GDPR, targeting also needs to be based on lawful and appropriate data use.

Thematic analysis: Thematic analysis is a qualitative method used to identify and interpret recurring patterns in data, such as interview transcripts (Braun & Clarke, 2006). It helps a researcher move from many detailed comments to a smaller set of meaningful themes. In this dissertation, it is the main method used to analyse the interview material.

Thematic saturation: Thematic saturation is reached when further interviews are no longer adding clearly new themes (Braun & Clarke, 2006; Malterud et al., 2016). This does not mean that every possible idea has been exhausted, but rather suggests that the researcher has enough data to describe the main patterns confidently. In qualitative research, it is one sign that the sample has reached useful depth.

Third-party data: Third-party data is data collected by another organisation and then sold or shared for use elsewhere (Miller et al., 2025). It often comes from brokers, ad networks, or external platforms rather than from a direct relationship with the user. In this dissertation, third-party data matters because it can create both trust risks and GDPR compliance concerns.

Tracking: Tracking means collecting data about what users do across websites, apps, or digital sessions (Miller et al., 2025; Kretschmer et al., 2021). This can involve cookies, pixels, device identifiers, or similar tools. Tracking is important to personalised marketing, but it also sits at the centre of many privacy and consent concerns.

Transferability: Transferability refers to how far research findings may be relevant to other settings beyond the one studied (Braun & Clarke, 2006; Nowell et al., 2017). In qualitative research, the researcher does not claim automatic generalisation. Instead, enough context is provided so that the reader can judge whether the findings may apply elsewhere.

Transparency: In the context of GDPR, transparency means being clear about what data are collected, why they are collected, how they are used, and who they may be shared with (EU Regulation 2016/679, Art.5(1)(a); Culnan & Armstrong, 1999). It requires plain language rather than vague or hidden wording. In this dissertation, transparency is treated as a practical condition for trust as well as a compliance requirement.

Trust: In the context of personalised marketing, trust is the belief that an organisation will behave responsibly, honestly, and fairly when handling personal data and communicating with customers (Culnan & Armstrong, 1999;

Paine Schofield & Joinson, 2008). When trust is strong, people are more likely to engage with personalised marketing. When trust is weak, even legally compliant activity may still be seen as intrusive.

UX: UX stands for user experience. It describes what it feels like for a person to use a website, app, or digital service, including clarity, ease of use, and emotional response (Kretschmer et al., 2021). In this dissertation, UX matters because privacy controls and consent tools only work properly if people can understand and use them easily.

Value exchange: Value exchange means the balance between what a person gives and what they get in return (Dinev & Hart, 2006; Leszczynska & Baltag, 2024). In data-driven marketing, it usually refers to the trade-off between sharing personal data and receiving something useful, such as relevant content, time savings, or better service. A clearer and fairer value exchange can make personalisation feel more acceptable.

1.0 Introduction

This dissertation examines how UK-based small and medium-sized enterprises (SMEs) operating in business-to-business (B2B) markets balance personalised marketing with General Data Protection Regulation (GDPR) privacy requirements. In this study, personalised marketing means tailoring messages, timing, or offers to a customer's behaviour or preferences (Chandra et al., 2022; Cavdar Aksoy et al., 2021). GDPR limits how personal data can be collected and used, thus creating a practical challenge for SMEs that want relevant marketing but have limited budgets, time, and specialist support (Brodin, 2019; Voigt & von dem Bussche, 2024).

1.1 The disruption and constraints of GDPR for SMEs

For SMEs, GDPR created practical demands that go well beyond legal wording. Compliance often means new processes, record-keeping, and internal coordination, and that can be costly when teams are small and time is tight (Brodin, 2019; Voigt & von dem Bussche, 2024). Policy reports also suggest that smaller organisations feel governance and documentation pressure more sharply than larger organisations with dedicated compliance teams (Chivot & Castro, 2019). In practice, GDPR affects not only what data SMEs can collect, but also how quickly they can act on marketing opportunities and how much experimentation they can afford.

Personalisation is widely presented as a way to improve relevance and engagement, but much of that research comes from broad consumer or general marketing settings rather than from SMEs themselves (Chandra et al., 2022; McKee et al., 2025). GDPR, by contrast, places direct limits on the collection and use of personal data (Voigt & von dem Bussche, 2024). The practical question for SMEs is therefore not whether personalisation matters, but how to do it under tighter compliance conditions and with fewer internal resources (Brodin, 2019). Working papers and policy reports also indicate that smaller organisations face heavier documentation and resourcing pressure, although that research is used here as context rather than direct proof of UK-based B2B SME practice (Joswig & Kurz, 2025; Chivot & Castro, 2019).

GDPR also changed the wider data environment in which SMEs operate (Brodin, 2019). Miller et al. (2025) report a 14.79 per cent reduction in trackers per publisher after GDPR enforcement. This research comes from publisher-level data and should be interpreted cautiously in an SME context, where scale, infrastructure, and consent architecture differ significantly from large publishers, so it does not show SME practice directly. It does, however, point to a wider reduction in digital data availability, which is likely to leave SMEs more dependent on first-party data from newsletters, website activity, social media engagement, transaction patterns, and CRM updates.

Consent design is another important constraint, shaping what data organisations can collect and how users engage with notices (Bielova et al., 2024; Utz et al., 2019). Banner layout and choice architecture also shape consent outcomes (Bielova et al., 2024; Utz et al., 2019). For example, Kulyk et al. (2018) show that cookie disclaimers can change perceptions but often do not lead to informed decisions. Zhang et al. (2024) show that post-GDPR intentions and behaviours can diverge, which suggests that legal consent does not always mean informed engagement. These studies focus mainly on user-facing digital environments rather than UK-based B2B SMEs directly, but they help explain how compliance design shapes both data supply and user behaviour.

Most GDPR research focuses on ecosystem-level tracking changes, website compliance, or consumer responses rather than on the day-to-day marketing decisions made by SMEs (Miller et al., 2025; Kretschmer et al., 2021).

1.2 Research gap

The research gap has three main parts. First, there is limited SME-specific research on how GDPR shapes day-to-day personalisation decisions, because much of the literature focuses on large platforms or consumer-level outcomes (Brodin, 2019; Miller et al., 2025). Second, there is limited operational guidance on how SMEs should implement consent, data minimisation, and governance in practice, especially when they rely on third-party tools (Utz et al., 2019; Biega et al., 2020). Third, B2B SME contexts are under-represented. Existing SME marketing research shows that smaller organisations often adapt marketing to context rather than rely on standardised systems, which makes direct transfer from large-firm or consumer studies difficult (Resnick et al., 2016).

1.3 Research aim

The aim of this study is to examine how B2B SMEs in the UK implement GDPR-compliant personalisation and which consent, minimisation, and governance choices they regard as viable under resource constraints.

The specific objectives and research questions are presented at the end of the literature review. A key note to consider is that much of the existing research generalises from large-organisation settings, which weakens its explanatory value for SMEs. The next chapter therefore.

2.0 Literature review

This literature review is organised around the conditions under which GDPR-compliant personalisation can work in SME settings (Voigt & von dem Bussche, 2024; Dinev & Hart, 2006). The aim is not just to summarise previous studies, but to connect consumer theory, regulatory change, technological design, and ethical governance in a way that helps explain practical decision-making.

Each strand includes a critical view of the strength and scope of the research so that limits to generalisation stay clear. Taken together, the strands point to a persistent gap between GDPR principles in theory and GDPR implementation in SME practice (Brodin, 2019; Voigt & von dem Bussche, 2024). The review then narrows towards the practical routes SMEs might use to align personalisation with both compliance and trust (Brodin, 2019; Culnan & Armstrong, 1999).

Throughout this review, the context of research is stated clearly. Consumer-level studies are used to explain how people respond to consent, disclosure, and personalisation. Platform and website studies are used to explain changes in tracking, consent mechanics, and data availability. Technical system studies are used to explain what personalisation tools require in principle. SME studies are used when the argument concerns organisational practice. Where research comes from outside UK-based B2B SMEs, it is treated as contextual or theoretical support rather than as direct proof.

2.1 Disclosure, value exchange, and trust

A useful way to explain why people share data is the privacy calculus. This means people weigh expected benefits against perceived risks (Dinev & Hart, 2006). The decision is not fixed. It changes with the situation. Trepte et al. (2020) found that social media users may be more willing to share data when they see what others are doing or feel connected to a group. Barth and de Jong (2017) and Gerber et al. (2018) also show that what people say about privacy does not always match what they do online. These studies come from broad consumer settings, so they are used here to explain disclosure behaviour in general rather than as direct research about UK-based B2B SMEs. For SMEs, the implication is that disclosure depends on whether users see data practices as fair and trustworthy, not only on what users claim to believe about privacy (Culnan & Armstrong, 1999).

Aguirre et al. (2015) and Bleier and Eisenbeiss (2015) suggest that people respond more positively to personalisation when it feels useful and legitimate. In online advertising, trust-building and clear data-use cues can improve outcomes, whereas covert collection can raise perceived vulnerability and reduce effectiveness (Aguirre et al., 2015; Bleier & Eisenbeiss, 2015). Leszczynska and Baltag (2024) also show that willingness to share data changes across personalisation scenarios.

Further research suggests that personalisation works best when people see the value exchange as fair (Aguirre et al., 2015; Bleier & Eisenbeiss, 2015). Benefits such as usefulness or social support interact with privacy concerns, which means disclosure is driven by both expected value and perceived risk (Trepte, Scharkow & Dienlin, 2020). Leszczynska and Baltag (2024) show that willingness to share data varies across contexts, which suggests that framing matters. For SMEs, the implication is indirect but important as they need to explain value and fairness clearly, even though the underlying studies were not designed around UK-based B2B SMEs (Brodin, 2019).

This fits procedural fairness theory, which links fair data practices to impersonal trust in organisations (Culnan & Armstrong, 1999). Paine Schofield and Joinson (2008) similarly show that disclosure decisions are shaped by

perceived legitimacy and lower uncertainty in online settings. Research on British digital SMEs suggests that signalling through communication strategy can influence how smaller organisations present credibility in the market (Roohanifar et al., 2025).

Prior research also warns against treating willingness to share data as a stable personal trait. Privacy behaviour depends on the situation, on platform cues such as design, and on how intrusive the data collection feels (Aguirre et al., 2015; Trepte, Scharnow & Dienlin, 2020). Reviews of the privacy paradox, meaning the gap between what people say and what they do, show that this mismatch is common (Barth & de Jong, 2017; Gerber, Gerber & Volkamer, 2018). For SMEs, this means transparency and consent design should be treated as practical tools that need testing and refinement rather than as fixed solutions (Bleier & Eisenbeiss, 2015).

McKee et al. (2025), using consumer survey research, suggest that when users see real value in personalisation, they are less likely to avoid it. Cavdar Aksoy et al. (2021) provide a broad typology of personalisation practices and show that marketing openly based on user data needs clearer explanation and consent than inferred personalisation. These studies help explain the wider personalisation debate, but they do not directly study UK-based B2B SMEs. For UK-based B2B SMEs, the practical issue is deciding which forms of personalisation are both trustworthy and GDPR-compliant, especially when organisations rely heavily on third-party platforms and have limited compliance capacity (Brodin, 2019).

Existing academic research on privacy calculus and disclosure does not address how SMEs in the B2B sector can practically manage the challenges highlighted in the research. This study addresses that gap by examining how UK-based B2B SME managers implement the value exchange and trust within those organisational and regulatory limits.

It is important to note that the privacy calculus literature has predominantly been developed in consumer and e-commerce contexts (Dinev & Hart, 2006; Malhotra et al., 2004). Its application to B2B SME marketing is not straightforward. In B2B settings, decisions about data sharing involve professional relationships and contractual obligations rather than individual consumer choices, which means the benefit and risk calculations may differ substantially.

2.2 The effects of GDPR on tracking and markets

GDPR changed the data environment in which personalisation happens. Publisher-level and web-wide research shows a measurable drop in tracking after its implementation, which reduces the volume and richness of behavioural data available to marketers (Miller et al., 2025). Consent notices are a key part of this change because they add friction between the user and the website and make data collection depend on active agreement (Utz et al., 2019; Kretschmer et al., 2021). Studies of consent banners also show that design choices can materially change opt-in rates, meaning that organisations may collect very different data depending on how consent is presented (Bielova et al., 2024). These studies mainly examine platform, website, or consumer-level behaviour.

Reduced consent also narrows data consistency across channels. Organisations relying on opt-in subsets risk skewed insight and lower personalisation accuracy an inferred operational risk for SMEs, even where the direct effect is not measured in the studies reviewed (Miller et al., 2025; Kretschmer et al., 2021).

GDPR also set clear legal principles that require personal data processing to be lawful, fair, transparent, and purpose-limited (Voigt & von dem Bussche, 2024). Personalisation depends on repeated data collection and profiling decisions, so those activities must stay within these principles (Voigt & von dem Bussche, 2024). Personalisation is therefore shaped not only by consumer attitudes but also by formal legal duties that affect what data can be collected and how it can be used.

Miller et al. (2025) found that GDPR reduced trackers per publisher by 14.79 per cent, which points to a measurable contraction in data collection after enforcement. At the same time, consent outcomes are highly sensitive to banner design and framing, which means data availability can vary widely across implementations (Bielova et al., 2024; Utz et al., 2019). Kretschmer et al. (2021) further show that stronger transparency rules can exist alongside uneven compliance in practice. Taken together, this research shows that GDPR acts as both a legal and a data-supply constraint at an ecosystem level. What remains unclear is how SME marketers adapt targeting, measurement, and consent operations under reduced and more selective data flows.

However, the generalisability of these findings to SME contexts is limited. The research reviewed measures GDPR's impact on publisher-level tracking infrastructure and large-scale digital advertising ecosystems. SMEs typically operate with simpler technology stacks, smaller data volumes, and fewer third-party integrations, which means the post-GDPR tracking reduction they experience may look different in both scale and mechanism. The research base for GDPR's direct effects on SME-level personalisation practices remains thin (Brodin, 2019; Joswig & Kurz, 2025).

Consent mechanisms are often implemented through consent management platforms (CMPs) rather than custom-built systems (Utz et al., 2019). Because of resource and knowledge limits, SMEs typically rely on default CMP settings and are often unable to build tailored consent infrastructure (Brodin, 2019). This matters because Utz et al. (2019) show that notice position, framing, and emphasis can change consent outcomes. Publisher-side research also suggests that explicit-consent implementation can affect advertising performance depending on consent rates and targeting alternatives (Wang, Jiang & Yang, 2024). That publisher research is useful for showing how consent can affect digital performance, but it is not direct research from SME settings.

SMEs can therefore treat consent design as a performance lever, but doing so creates a tension between short-term opt-in goals and long-term trust if users feel pushed or manipulated (Aguirre et al., 2015; Utz et al., 2019). Because most SMEs rely on vendor defaults, their ability to test and refine consent flows is limited (Brodin, 2019). This can be a problem when default CMP settings prioritise data capture over meaningful choice (Utz et al., 2019; Bielova et al., 2024). The literature therefore treats consent design as an operational variable, not just a legal formality, while still noting limited B2B-specific research (Brodin, 2019).

The literature establishes GDPR as both a legal and a data-supply constraint at ecosystem level, but leaves open how SME marketing teams adapt their operations under those conditions. This study addresses that gap, focusing on how UK-based B2B SME managers experience GDPR operationally and what decisions they make in response.

2.3 Data minimisation and system design

This section explains why data minimisation and system design matter for SME personalisation.

Data minimisation is a core GDPR principle that affects what information can be collected and kept, because organisations should only collect data that are clearly needed for a defined purpose (Voigt & von dem Bussche, 2024). Technical research shows that personalisation systems are sensitive to both data quantity and data quality. Sparse or limited data can lead to weaker recommendations and cold-start problems for new users (Adomavicius and Tuzhilin, 2005; Herlocker et al., 2002). Minimisation can therefore carry a performance cost unless organisations adjust their systems and processes. Studies on data minimisation show that it is possible to reduce data while preserving acceptable performance, but this depends on deliberate design choices and testing (Biega et al., 2020; Leysen et al., 2025). For SMEs, this is difficult because many rely on third-party tools, have limited control over settings, and lack the technical capacity to redesign data pipelines (Brodin, 2019). As a result, minimisation becomes an operational and governance issue rather than a simple legal checkbox.

Data minimisation requires personal data processing to be limited to what is necessary for stated purposes, and that directly shapes personalisation design choices (Voigt & von dem Bussche, 2024). At the same time, personalisation systems often work on the assumption that more data produce better performance and wider segmentation options (Adomavicius and Tuzhilin, 2005). Brodin (2019) suggests that SMEs face particular compliance burdens under GDPR, which means minimisation is not only a technical principle but also a practical resource issue.

Baig, Yadegaridehkordi and Md Nasir (2023) suggest that big-data adoption in SMEs depends on perceived benefits, technological complexity, organisational resources, management support, and regulation. Earlier work by Biega et al. (2020) similarly shows that minimisation requires explicit decisions about which signals are essential and which are not. This moves the issue from policy into system design and shows that compliance depends on practical trade-offs rather than broad statements of intent.

For SME decision-makers, practical control is concentrated in a narrow set of levers. These include what data fields are collected, how consent options are configured within platform limits, how long data are retained, and how rule-based audience segmentation is activated. By contrast, SMEs often cannot control model architecture, cross-platform identity resolution, or a vendor's optimisation logic. This dissertation therefore uses technical literature as a boundary condition for managerial choice rather than as an assumption of full algorithmic control.

Herlocker et al. (2002) and Adomavicius and Tuzhilin (2005) suggest that personalisation is only as strong as the data and system behind it. Zong et al. (2024), by contrast, show that analytics can improve SME marketing results, although success still depends heavily on internal capacity and governance quality. For this dissertation, the practical question is therefore how SME marketers work within vendor-managed system limits rather than how they optimise algorithms directly.

These system design choices are often embedded in third-party platforms that SMEs do not fully control (Brodin, 2019). Much recommender-system research is designed for technical evaluation rather than managerial implementation, which limits its direct use for SME decision-making (Adomavicius and Tuzhilin, 2005; Herlocker et al., 2002). This boundary is important for RQ3 and RQ4 because it focuses the empirical analysis on consent, minimisation, and governance choices that are practically achievable rather than on ideal technical optimisation.

The literature reviewed in this section therefore establishes that data minimisation is technically achievable in principle but operationally uncertain for SMEs working within vendor-managed platforms they do not fully control. What it does not yet show is how SME managers decide which data fields to collect, which to retain, and how to configure consent and segmentation options within those platform limits without access to algorithmic control or dedicated compliance expertise. The study addresses this question by focusing on the governance choices that are practically available to resource-constrained SME marketing teams.

2.4 How ethical governance can be applied in AI-enabled personalisation for SMEs

Saura et al. (2024) suggest that AI-enabled marketing requires caution because systems optimised for quick results can undermine user autonomy by bypassing meaningful understanding and choice. This means ethical governance is not just a legal issue. It becomes an operational issue about how personalisation affects user independence, perceived fairness, and transparency.

Other research supports this concern. Saura et al. (2024) link behavioural acceptance to a privacy paradox, while Gao et al. (2023) identify bias and transparency gaps in AI-driven advertising. Consent studies also show that design can alter user behaviour, but the effects are highly context-dependent (Utz et al., 2019; Bielova et al., 2024). Together, these findings highlight a governance gap: formal legal consent does not necessarily guarantee

meaningful user control. For resource-constrained SMEs, this raises a question of whether governance routines can be proportionate to their size and still work effectively, especially when consent settings are often inherited from third-party platforms (Brodin, 2019).

This problem is compounded by the fact that governance processes usually require expertise and resources that SMEs often lack (Brodin, 2019). Much of the existing literature is review-based, which gives clear ethical principles but limited research on specific interventions in practice (Saura et al., 2024). That leaves a persistent gap between ethical expectations and what smaller organisations can realistically do day to day.

Vishwakarma et al. (2025) provide a broad strategic discussion of personalisation, privacy, and ethical marketing. The paper draws on earlier empirical studies, industry practice, and regulatory change rather than on SME-specific fieldwork, so it is more useful here as a conceptual prompt than as direct research of routine SME practice. Saura et al. (2024) likewise make the ethical issues clear but offer limited guidance on implementation safeguards. Ethical principles are therefore clearer in theory than in daily practice. SMEs are left to translate broad principles into workable routines while managing limited resources and platform dependence (Brodin, 2019; Saura et al., 2024).

The existing literature on ethical governance in AI-enabled marketing therefore identifies what good practice looks like in principle, but provides limited research on how smaller organisations with constrained resources and platform-dependent operations can implement those principles in daily marketing operations. The present study addresses this gap by examining the governance routines that UK-based B2B SME marketing teams actually sustain, and how those routines are shaped by the capabilities and defaults of the technology platforms they depend on.

2.5 The research gap

The literature shows that trust and perceived fairness matter for data sharing (Dinev & Hart, 2006; Culnan & Armstrong, 1999), and it shows clear post-GDPR changes in tracking and consent practice (Miller et al., 2025; Kretschmer et al., 2021). However, technical research on data minimisation and recommender systems is often too abstract to translate directly into the operational and budget realities of SMEs (Biega et al., 2020; Leysen et al., 2025; Adomavicius and Tuzhilin, 2005). Discussions of ethical governance are also often theoretical and highlight risk without giving smaller organisations much practical guidance (Saura et al., 2024).

This study addresses that gap by focusing on how SME decision-makers judge and implement viable personalisation under GDPR. It treats the privacy-performance balance as a practical organisational and infrastructural issue and examines the criteria managers use to decide which governance choices can be sustained.

3.0 Conceptual Framework

This chapter sets out the analytical approach used to interpret the research findings. It identifies the four theoretical lenses drawn from the literature review, explains how each was implemented in the analysis, and shows how they interact to address the four research questions. The framework is not used as a rigid coding template. It is used as an interpretive guide that keeps the analysis grounded in theory while remaining responsive to what participants described.

Based on the literature reviewed, the study draws on four connected analytical lenses: privacy calculus (Dinev & Hart, 2006; Malhotra et al., 2004), procedural fairness (Culnan & Armstrong, 1999), SME compliance constraints (Brodin, 2019; Joswig & Kurz, 2025), and personalisation typology (Cavdar Aksoy et al., 2021). Each lens addresses a different dimension of the privacy-performance challenge. Together they form an integrated analytical framework that is better suited to the practical complexity of B2B SME marketing under GDPR than any single theory alone.

The first lens is privacy calculus (Dinev & Hart, 2006; Malhotra et al., 2004). This framework treats data sharing as a judgement about perceived benefits against perceived risks. In this study, privacy calculus was implemented on the managerial side rather than the consumer side. Interview questions probed how participants weighed the commercial benefit of personalisation such as lead quality, engagement, and conversion against the governance cost of compliance: time, skills, platform configuration, and reputational risk. Where participants described tolerating lower personalisation precision to avoid compliance difficulty, this was interpreted as a supply-side privacy calculus trade-off. The lens is used descriptively rather than predictively: it provides a vocabulary for comparing how different managers balance the same underlying tension.

The second lens is procedural fairness (Culnan & Armstrong, 1999). This framework links fair data-handling practices to impersonal trust and willingness to engage. In this study, procedural fairness was implemented through the consent, transparency, and data-minimisation practices that participants described. Where participants reported using clear opt-in language, preference centres, and explicit data-use explanations, this was interpreted as evidence of procedural fairness in practice. Where participants described relying on platform defaults rather than deliberate fairness design, this raised questions about whether procedural fairness was being actively constructed or passively inherited from vendor settings. This distinction was a central analytical question across all four themes.

The third lens is SME compliance constraints (Brodin, 2019; Joswig & Kurz, 2025). This framework identifies the structural factors that limit GDPR compliance quality in small organisations: limited resources, informal processes, and lack of specialist expertise. In this study, the lens was implemented by examining where and why participants described practical trade-offs, workarounds, or selective enforcement. Rather than treating these as compliance failures, the framework interprets them as predictable outcomes of the resource environment in which SMEs operate. The lens was used to distinguish between cases where participants lacked knowledge (a knowledge gap) and cases where they lacked capacity (a resource gap), since the two have different implications for how governance quality can realistically be improved.

The fourth lens is personalisation typology (Cavdar Aksoy et al., 2021). This framework classifies personalisation practices along three data dimensions: individual-level data (profile and preference), social-level data (network and context), and situational data (timing, location, device). In this study, the lens was implemented by mapping participants' described practices onto these dimensions to identify which types of personalisation remain viable

under GDPR data minimisation requirements. Role-based and sector-based segmentation, which draw on declared individual-level data, were consistently described as viable. Behavioural retargeting and cross-device tracking, which draw on passive social and situational data, were consistently described as reduced or eliminated. This lens provided the analytical structure for identifying the boundary between compliant and non-compliant personalisation in practice.

Taken together, the four lenses form an integrated framework for analysing the privacy-performance challenge in SMEs. Privacy calculus explains the trade-off logic that managers use when deciding what personalisation is worth pursuing. Procedural fairness explains why the design of consent and data-handling processes matters for sustained trust. SME compliance constraints explain why those processes are often simplified, delegated, or platform-mediated in practice.

Personalisation typology explains which specific practices remain commercially viable within the data constraints that GDPR imposes. No single lens is sufficient. A finding that only appears through one lens for example, a participant tolerating imprecise segmentation becomes analytically richer when read through all four: as a trade-off (calculus), a fairness compromise (procedural fairness), a resource response (SME constraints), and a typological shift (personalisation typology). This integrated reading is the analytical contribution of the framework to the study.

Research question 1(RQ1) and research question (RQ2) focus on the impact of GDPR and the problems it creates. Research question (RQ3) focuses on the practical choices managers make under those constraints, and research question (RQ4) focuses on the research managers use to decide whether those choices can be sustained over time.

In this dissertation, performance refers to marketing results as judged by managers themselves, such as lead quality, campaign response, and customer reaction, rather than audited financial results. Financial sustainability refers to the ability to keep GDPR-compliant personalisation running without making compliance or acquisition costs unmanageable. Operational sustainability refers to the ability to maintain the routines for consent, minimisation, and governance with the time, skills, and system capacity currently available to the SME.

Research aim, objectives and questions

The aim of this study is to examine how B2B SMEs implement GDPR-compliant personalisation and what consent, minimisation, and governance choices they regard as viable under resource constraints.

Research objectives

- 1) To clarify how GDPR has reshaped data collection, tracking, and targeting practices that SMEs rely on for personalisation.
- 2) To identify operational, financial, and knowledge-based barriers that constrain SME compliance and marketing performance.
- 3) To examine how SMEs interpret and implement consent, transparency, and minimisation in their day-to-day marketing operations.
- 4) To identify the research needed to evaluate whether these practices are sustainable and effective in SME settings.

Research questions

Research question 1: How has GDPR altered SME personalisation practices?

Research question 2: What barriers limit SME compliance and marketing performance?

Research question 3: Which consent, minimisation, and governance choices are viable in practice for SMEs?

Research question 4: What is needed to evaluate the sustainability and effectiveness of SME consent, minimisation, and governance choices?

Through these questions, the study focuses on how marketers in SMEs judge the ongoing viability of personalised marketing rather than on auditing performance directly.

4.0 Methodology

This chapter describes the research approach used in the study. The study used a qualitative design with semi-structured interviews (Vishwakarma et al., 2025; Malterud, Siersma & Guassora, 2016).

The literature review shows that GDPR affects personalised marketing in several connected ways. It makes consent harder to obtain, reduces the ability to track behaviour, and requires organisations to minimise the data they collect. It also shows that trust is central to successful marketing and data sharing (Miller et al., 2025; Utz et al., 2019; Biega et al., 2020; Culnan & Armstrong, 1999). For that reason, this study used semi-structured interviews to explore how SMEs understand and manage these requirements in daily practice.

This qualitative design was constructed specifically to address the gap left by the literature. It was chosen because the literature left a practical gap between broad GDPR theory, platform-level research, and the everyday decisions made inside SMEs. It was chosen because the literature left a practical gap between broad GDPR theory, platform-level research, and the everyday decisions made inside SMEs. Semi-structured interviews are a suitable way of understanding that gap because they allow decision-makers to explain how they interpret constraints, make trade-offs, and judge what is viable in context (Malterud, Siersma & Guassora, 2016).

The study therefore gathered organisation-level research from SME decision-makers rather than relying only on consumer surveys, platform metrics, or conceptual discussion. The aim was to produce the kind of practice-based research that the current literature does not yet provide clearly for UK-based B2B SMEs.

4.1 Research philosophy

A pragmatist research philosophy was adopted. This reflected the view that SME marketing practice was shaped both by how managers interpret events and by the observable routines and constraints they work within. It fitted the literature review, which focuses on perceived benefits, risks, trust, and fairness, while also paying attention to what organisations can actually do in practice (Dinev & Hart, 2006; Culnan & Armstrong, 1999). Pragmatism therefore supported a qualitative, practice-focused approach to explanation.

4.2 Research approach and design

The study used a qualitative interview design based on semi-structured interviews with B2B SME marketing decision-makers in the UK. The sample size was 10-15 interviews, and data collection continued until thematic saturation was reached. This design fitted the literature review, which shows that most GDPR research is macro-level and gives limited insight into how SMEs adapt in practice. It also fitted the consent and tracking literature, which shows that data availability is shaped by everyday design and governance choices (Bielova et al., 2024; Utz et al., 2019; Miller et al., 2025).

4.3 Alignment with research questions

Each research question was addressed through the interview process, with each question mapped against the interview themes and constructs used in the analysis. A mapping table is provided after the methodology chapter to show how RQ1-RQ4 structured the interview process and to support analytical transparency by making the research logic explicit (Nowell et al., 2017).

4.4 Theoretical approach

The study was guided by privacy calculus and procedural fairness. Privacy calculus frames disclosure as a judgement about perceived benefits and risks, while procedural fairness links fair process to organisational trust (Dinev & Hart, 2006; Culnan & Armstrong, 1999). GDPR principles of lawfulness, transparency, and minimisation provided the regulatory boundary conditions (Voigt & von dem Bussche, 2024). These ideas shaped the interview questions by keeping attention on SME constraints, platform reliance, and consent design, which are all central in the literature reviewed above (Biega et al., 2020; Leysen, Favier & Goethals, 2025).

4.5 Interview guide design

The interview guide was organised around themes drawn directly from the literature review. These include consent and transparency management, reduced tracking and first-party data reliance, data minimisation in practice, platform constraints, and trust-performance trade-offs. These areas mattered because prior research shows that consent design affects data availability (Utz et al., 2019; Bielova et al., 2024), and that data minimisation requires practical decisions rather than broad policy statements (Biega et al., 2020). Broad open-ended questions were therefore used to explore both daily practice and the reasoning behind participants' decisions.

4.6 Sampling strategy

This section explains the sampling strategy used in the study design.

Purposive sampling was used to recruit UK-based B2B SME marketing decision-makers across professional services, agencies, technology, retail B2B, and advisory services. This sampling logic reflected the literature's emphasis on SME-specific constraints and sector sensitivity. The sample size was guided by information power rather than a fixed target: data collection continued until thematic saturation was reached, meaning until no substantively new themes emerged from additional interviews (Malterud, Siersma & Guassora, 2016).

The inclusion criteria were UK-based professionals working in an SME, with active responsibility for marketing and data decisions, and at least 12 months of relevant role experience. The exclusion criteria were professionals based outside the UK, those with a pure B2C focus, and those without decision authority over consent, data use, or campaign execution. The target sample remained 10-15 interviews, guided by information power rather than statistical representativeness (Malterud, Siersma & Guassora, 2016). After interview 10, stopping decisions were reviewed after each interview, and collection stopped when thematic saturation is reached, with a maximum of 15 interviews. See Appendix E for the recruitment materials and eligibility criteria. See Appendix F for the anonymised participant profile summary.

Eleven interviews were completed in total. By role, seven participants held Head of Marketing positions, two were Chief Marketing Officers, one was a Marketing Director, and one was Head of Marketing and Customer Experience. By organisation type, eight operated in B2B technology or software, one in B2B recruitment and talent services, one in B2B manufacturing, and one in B2B logistics and fulfilment. All participants had active responsibility for marketing strategy, data use, consent decisions, campaign execution, or governance activity. This breadth of sector coverage was deliberate: it provided cross-case comparison across different GDPR risk profiles, procurement cycle lengths, and team sizes while keeping the sample focused on B2B SME marketing decision-makers.

Data collection continued until thematic saturation was reached. High-frequency codes and themes appeared consistently from the fifth interview onwards, and no substantively new themes emerged after the seventh interview. Interviews eight through eleven added sectoral depth and nuance without introducing new analytical

patterns. The decision to stop at eleven interviews was reviewed after each subsequent interview and confirmed against the audit trail. A full anonymised participant profile is provided in Appendix F.

4.7 Recruitment

This section explains how participants were recruited.

Participants were recruited through targeted LinkedIn outreach, direct email contact, and professional network referrals. The recruitment process followed a sequential workflow. Potential participants were first identified on the basis of their publicly visible roles at UK B2B SME organisations. Each contact was checked against the inclusion and exclusion criteria before any outreach was made, to avoid inviting participants who did not meet the study scope. Contacts who met the criteria were then sent a standardised recruitment invitation introducing the study purpose, confirming that participation was voluntary, and offering the Participant Information Sheet, Consent Form, and Privacy Notice before any interview was scheduled.

Interested respondents were provided with the full study documentation and given the opportunity to ask questions before confirming their participation. Interview timing, recording arrangements, and the right to withdraw were confirmed in advance of each session. A recruitment log was maintained throughout the fieldwork period. The log recorded invitation status, response, sector and role classification, transcript completion, and anonymisation status for each contact. It was reviewed at regular intervals to assess whether the emerging sample continued to reflect the intended focus on UK-based B2B SME marketing decision-makers, and to identify any obvious gaps in sector or role coverage before recruitment closed. Full recruitment materials and eligibility criteria are provided in Appendix E.

4.8 Data collection process

This section describes the data collection process.

Interviews were conducted online, lasting approximately 45 to 60 minutes, and were audio-recorded with consent. Online interviewing was appropriate because participants were likely to be geographically dispersed across the UK and the topic concerns digitally mediated marketing and consent operations. This mode supported access across regions while allowing consistent interview conditions and confidentiality safeguards. Recordings were transcribed for analysis (Braun & Clarke, 2006). See Appendix D for the semi-structured interview guide.

4.9 Data analysis

The interview data were analysed using reflexive thematic analysis (Braun & Clarke, 2006). The process moved from data familiarisation to systematic coding, theme development and refinement, and ongoing checks of how the emerging themes connected to the study's conceptual framework.

4.10 Ethical considerations

Ethical approval was obtained before data collection in line with university procedures. Participants provided informed consent and were assured of confidentiality and the right to withdraw. Data were minimised and stored securely in line with GDPR obligations (Voigt & von dem Bussche, 2024). Audio files and transcripts were stored on encrypted drives with access restricted to the researcher.

4.11 Rigour and quality

This section describes how research quality was supported.

Research quality was addressed through credibility, transferability, dependability, and confirmability (Nowell et al., 2017). Credibility was supported by careful interview design, probing for concrete examples, and iterative theme refinement. Transferability was addressed through clear description of SME sectors, firm size, and platform dependence. Dependability was supported through an audit trail of recruitment, data collection, and analysis procedures, and confirmability was supported through reflexive notes documenting assumptions and analytic choices (Nowell et al., 2017).

4.12 Researcher positionality and reflexivity

This section describes how the researcher's background relates to the topic.

The researcher has prior professional experience in SME-focused B2B marketing practice, including work with digital campaign planning, customer communication, and platform-based targeting decisions. This background supports domain understanding but may also shape interpretation by making certain operational constraints appear more important than others.

To limit interpretive overreach, the study used a structured interview guide linked to the research questions, neutral questioning that probes both successful and unsuccessful practice, and explicit attention to disconfirming cases during analysis. Reflexive memos were kept after each interview to record assumptions, analytic shifts, and possible bias. Theme development was also traced in an audit log so that interpretive moves remain transparent and open to scrutiny.

4.13 Methodological limitations

This section describes the main limitations of the methodology.

The study has several important limitations that shape how the findings are interpreted. Because it used non-probability sampling rather than random selection, the results are not statistically generalisable to all SMEs. The findings were also based on self-reported accounts, so they may have been affected by recall error or by socially desirable presentation, where participants described compliance efforts in a more positive way than day-to-day reality. Although efforts were made to recruit a balanced sample, reliance on professional networks and social platforms may have under-represented some SME profiles.

The study focused specifically on B2B SMEs in the UK. This means the findings may not transfer easily to other countries or to businesses that sell directly to consumers (B2C). In addition, the researcher's own background and perspective could have influenced interpretation, even with the steps taken to manage reflexivity.

4.14 Mapping the research questions to the interviews

Table 4.1 provides explicit traceability between research questions, constructs, interview themes, and research type.

RQ	Theoretical constructs	Interview themes	Research type
RQ1: How has GDPR altered SME personalisation practices?	GDPR conditions, boundary consent friction, tracking reduction	Changes in data collection, consent configuration, first-party reliance, targeting adjustments	Process narratives, examples of pre/post GDPR practice changes
RQ2: What barriers limit SME compliance and marketing performance?	SME resource constraints, platform dependence, procedural fairness pressures	Financial, skill, time, and tooling barriers; trust/compliance trade-offs	Constraint accounts, decision trade-offs, negative cases
RQ3: Which consent, minimisation, and governance choices are viable in practice for SMEs?	Privacy calculus, procedural fairness, minimisation feasibility	Consent design choices, minimisation routines, governance practices, implementation feasibility	Decision rationales, implementation examples, perceived outcomes
RQ4: What is needed to evaluate the sustainability and effectiveness of SME consent, minimisation, and governance choices?	Sustainability criteria under legal, financial, and operational constraints	Indicators used by managers to judge ongoing viability, trade-offs, and adaptation triggers	Managerial evaluation criteria, continuity risks, research needs identified by participants

5.0 Findings

This chapter presents the findings from eleven semi-structured interviews conducted with UK-based B2B SME marketing decision-makers. The interviews were analysed using reflexive thematic analysis across three coding cycles, producing four themes that address the four research questions.

Table 5.0 summarises the analysis process. Figure 5.1 illustrates the thematic analysis pipeline. The four themes are then presented in Sections 5.1 to 5.4, each with supporting evidence from the interview data, including verbatim participant quotations and cross-case comparisons.

Step no	Stage	What was done	Deliverable	Quality check
1	Data collection	Semi-structured interviews completed with SME managers.	Interview transcript and interview notes	Participant anonymity and consent confirmed
2	Transcription	Interviews converted to analysable text.	Transcript set	Transcript spot-check against interview notes
3	Open coding	Initial labels applied to meaningful segments.	Initial code list	Code consistency check across excerpts
4	Code refinement	Overlapping codes merged and definitions tightened.	Final interview analysis codebook	Inclusion/exclusion criteria clarified
5	Theme development	Codes clustered into higher-order themes.	Themes 1-4	Internal coherence and external distinctiveness check
6	RQ mapping	Themes linked to RQ1-RQ4 as primary or partial contributions.	Theme-to-RQ matrix	Traceability from code to RQ checked
7	Findings write-up	Themes written with visual research from the study interpretation.	Chapter 4 narrative and visuals	Claims checked against coded research

Table 5.0 Research analysis process

Table 5.0 sets out the seven-stage analysis workflow used to move from raw interview data to the four themes presented in this chapter. The process followed the reflexive thematic analysis approach described in Chapter 4 (Braun & Clarke, 2006), moving from data collection and transcription through open coding and code refinement to theme development, RQ mapping, and findings write-up. Each stage produced a defined deliverable from initial interview transcripts to the final theme-to-RQ matrix and was paired with a quality check designed to keep analytical claims grounded in the data.

The quality checks were not mechanical audits. They were deliberate pauses built into the workflow to test whether codes were being applied consistently, whether themes were internally coherent and externally distinct, and whether the final claims could be traced back to specific coded extracts. This staged and auditable structure

supports the dependability and confirmability of the analysis (Nowell et al., 2017), and provides the transparency needed to assess how the four themes were constructed before they are presented in Sections 5.1 to 5.4.

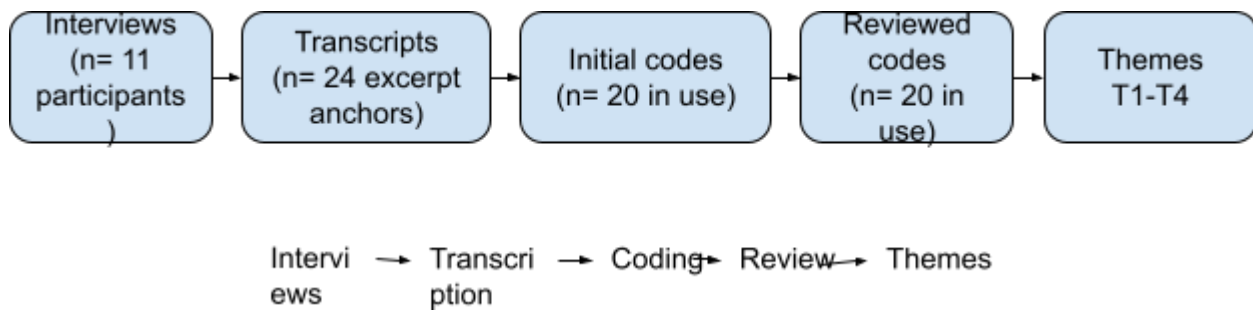


Figure 5.1 The thematic analysis process followed

Figure 5.1 shows the path from raw interviews to the four themes used in this chapter. The process moved from eleven interviews through transcription and open coding in Cycle 1, to theme construction in Cycle 2, and rival interpretation checking in Cycle 3. This three-cycle structure was designed to preserve analytical rigour while allowing themes to emerge from participant language rather than being imposed from theory.

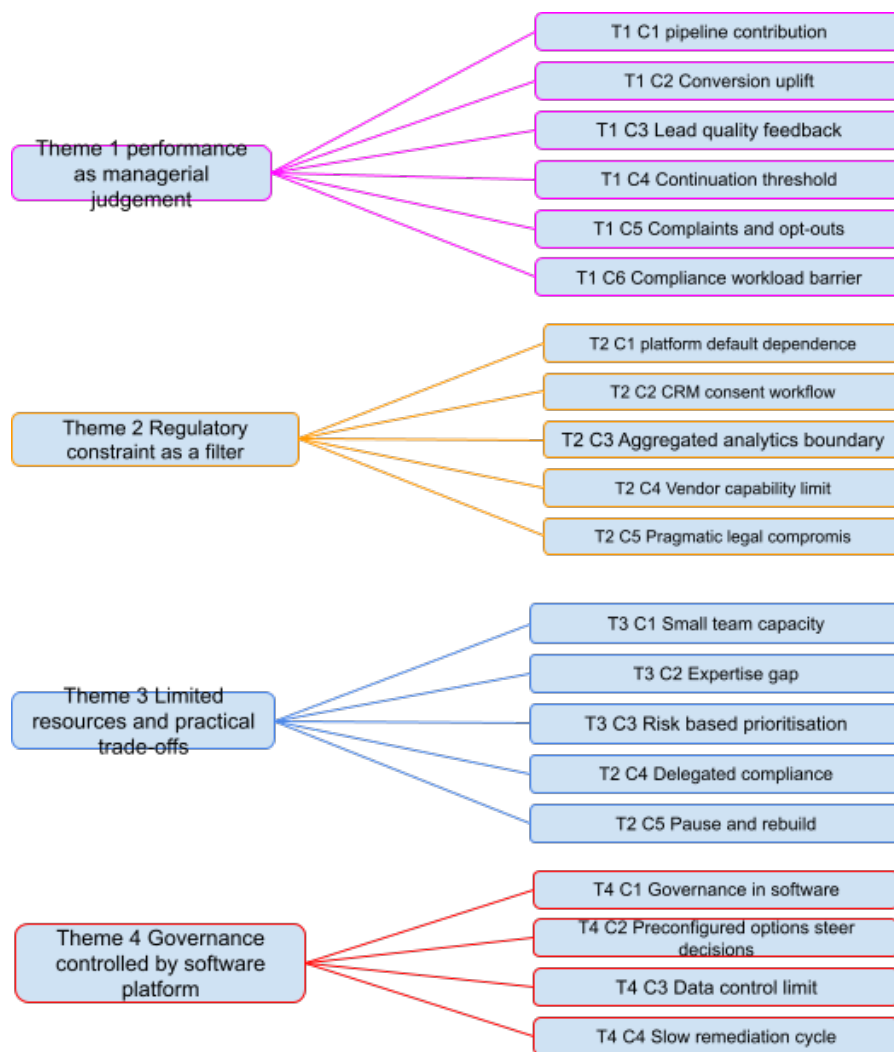


Figure 5.2 Codebook to research theme map

Figure 5.2 shows how the twenty active codes were grouped into the four final themes used in this chapter. Theme 1 (performance as managerial judgement) drew on codes relating to pipeline contribution, conversion uplift, lead quality, and continuation thresholds.

Theme 2 (regulatory Constraint as strategic filter) drew on codes for explicit consent architecture, first-party data reliance, and pre-campaign compliance checks. Theme 3 (resource constraint and selective enforcement) drew on codes for team size, time scarcity, attribution difficulty, and delegated compliance.

Theme 4 (platform-mediated governance) drew on codes for default platform settings, vendor integration, and automated retention routines. The map illustrates that while the themes are analytically distinct, several codes particularly those relating to consent configuration and data minimisation appear across multiple themes, reflecting the cross-cutting nature of GDPR governance in day-to-day SME operations.

Research theme ID	Research theme name	RQ1	RQ2	RQ3	RQ4
T1	Performance as managerial judgement	Partial	None	None	Primary
T2	Regulatory constraint as a filter	Primary	Partial	Primary	None
T3	Limited resources and practical trade-offs	None	Primary	Primary	Partial
T4	Governance controlled by software platform	None	Primary	Primary	Partial

Table 5.2 Theme-to-RQ matrix

Table 5.2: Theme-to-RQ matrix shows the alignment and contribution of the four main research themes (T1 to T4) to the four research questions (RQ1 to RQ4). No theme addresses all four questions equally:

Theme 1 (performance as managerial judgement) contributes primarily to RQ4 because it reveals how managers evaluate sustainability, while Theme 2 (Regulatory Constraint as a Filter) contributes primarily to RQ1 and RQ3 because it explains both how GDPR reshaped practice and which choices remain viable. The 'Partial' ratings indicate themes that provide supporting rather than primary evidence for a given question. This distribution reflects the cross-cutting nature of GDPR governance in SME practice as no single dimension of the data fully explains the privacy-performance challenge in isolation.

5.1 Theme 1: Performance as managerial judgement

Participants described success as a managerial judgement about whether personalisation could continue without creating too much trust risk, cost pressure, or governance friction. In this sense, success was not described as one metric or one campaign result. It was described as an ongoing judgement about whether the current approach remained workable.

A CMO at an HR software SME described their primary performance criteria as: “MQL to SQL conversion rate and cost per acquisition are the most important.” A CMO at a data analytics firm similarly reported aiming for a “20–30% pipeline contribution lift from personalised touches.” These commercial indicators were consistently paired with trust and compliance signals, reflecting the dual accountability managers described.

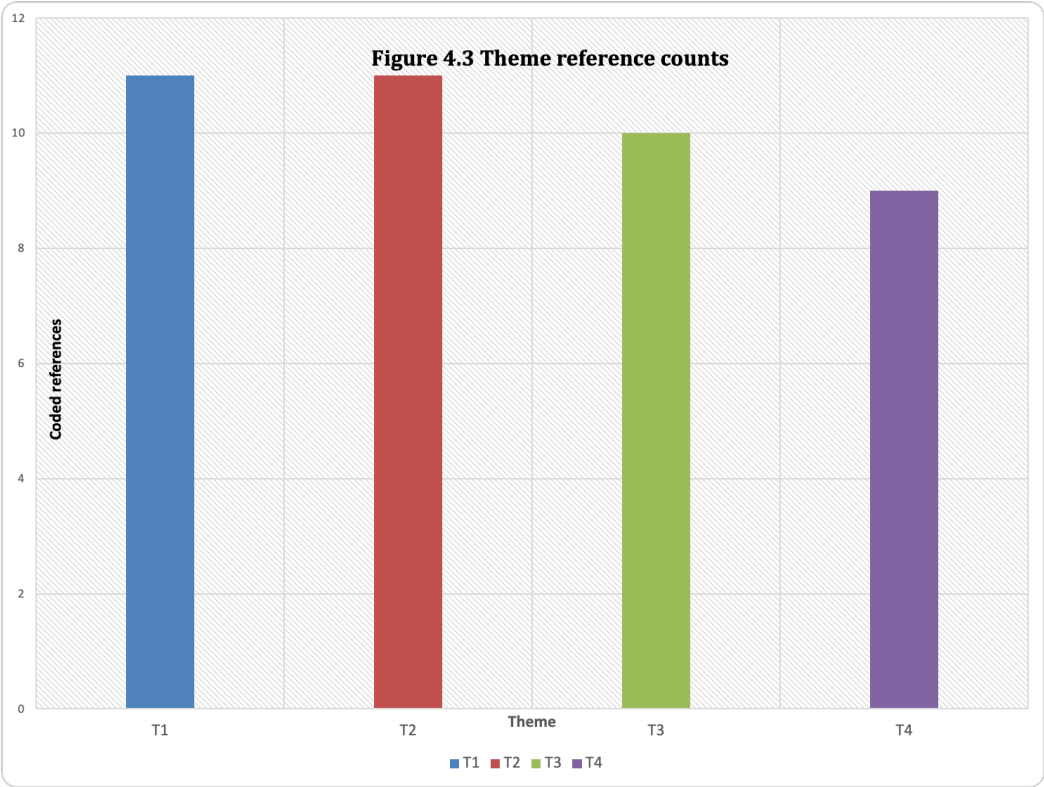


Figure 5.3 Participant theme reference counts

Figure 5.3 shows that all four themes appeared across the full participant set, which supports their analytical salience as cross-case patterns rather than single-case observations. Theme 1 and Theme 4 showed the highest reference density, suggesting that managerial performance judgement and platform-mediated governance were the most consistently described experiences. Theme 3 (resource constraints) was the most variable across cases: participants in smaller teams with no dedicated marketing operations support described constraint more intensely than those in slightly larger or better-resourced SMEs. This variation is noted in the analysis where relevant, and is part of the bounded transferability of the findings.

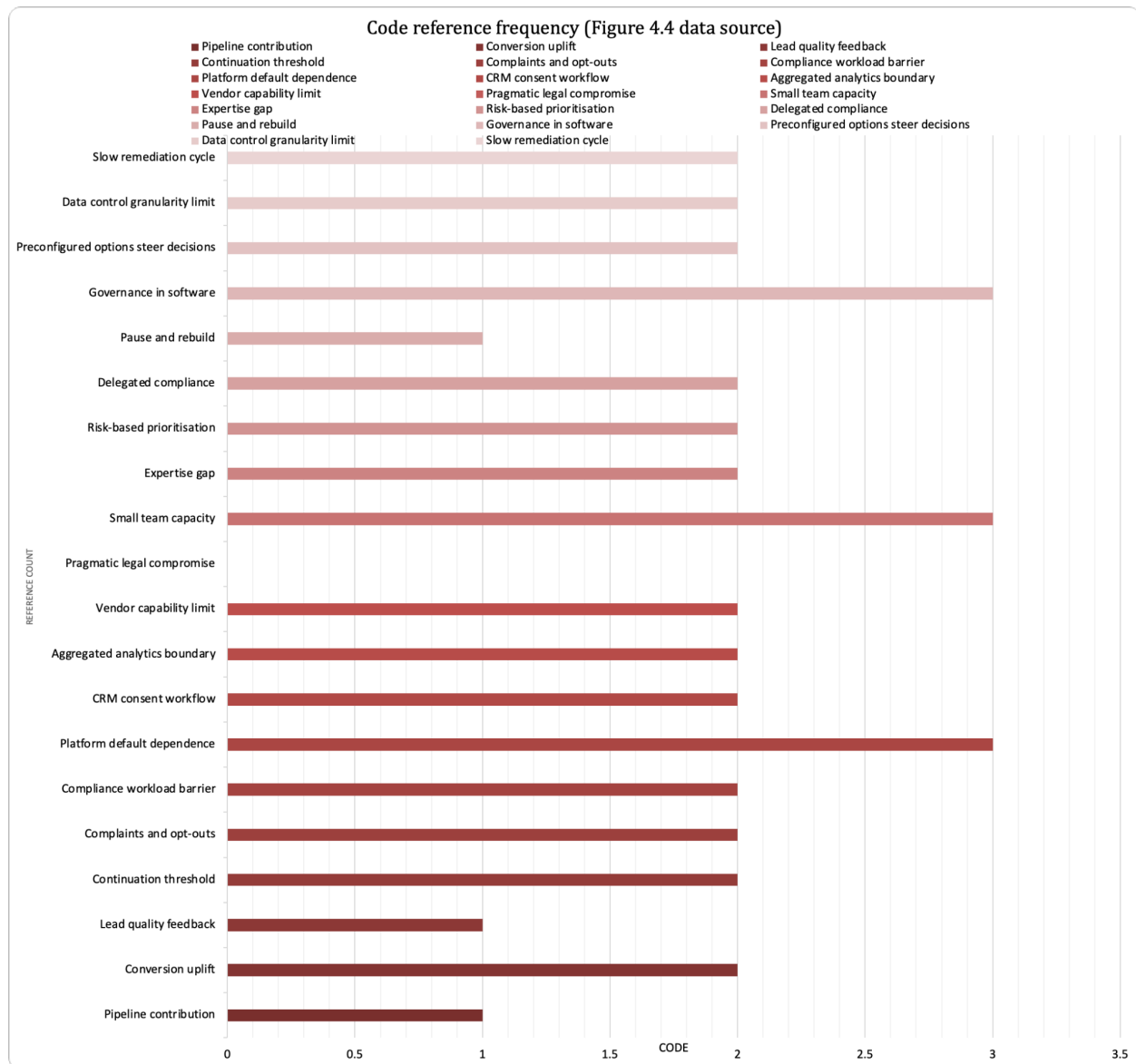


Figure 5.4 Theme 1 code frequency chart

Figure 5.4 shows that Theme 1 was built from several linked judgement criteria that participants used together rather than in isolation. Complaint volume and opt-out rates appeared as the most frequently cited signals, suggesting that trust indicators were treated as preconditions for commercial performance rather than as secondary concerns. Pipeline contribution and MQL-to-SQL conversion were cited by participants in revenue-facing roles, while cost per lead was more prominent in marketing teams under budget pressure. The co-occurrence of compliance and commercial signals in the same judgement is the core analytical contribution of Theme 1: managers did not separate performance from trust when evaluating whether to continue a personalisation approach.

Participants also distinguished between financial continuation and operational continuation. Financial continuation referred to whether campaigns generated enough commercial movement to justify spend. Operational continuation referred to whether teams could repeat the approach with the time, tools, and governance effort available. Several participants reported that a campaign could look commercially promising but still be paused if compliance administration became too heavy for the team.

Several participants linked sustainability explicitly to adaptability rather than perfection. A Head of Marketing at a B2B recruitment agency described it as: “Sustainable isn’t perfect. It’s adaptable.” This captures a recurring pattern in the data: managers did not expect to achieve a fixed standard of compliance. They expected to maintain a direction of travel and to adjust when signals indicated that either performance or trust was deteriorating.

This pattern of quality over volume was echoed across sectors. A Marketing Director at an HR software SME described the practical consequence: “Pre-GDPR, you could scale fast broad targeting, lots of contacts. Post-GDPR, personalisation is tighter, maybe shrunk by 35 to 40 per cent in reach, but the contacts we do have are genuinely engaged. It’s a different kind of performance standard.” This framing of compliance-driven contraction as a form of commercial recalibration rather than loss was a recurring pattern among participants who had operated through both periods.

This theme primarily addresses RQ4 and partially informs RQ1.

Theme 1 addresses RQ4 directly because it reveals what participants actually treated as evidence of sustainability and effectiveness. The existing literature, particularly Dinev and Hart (2006) and Culnan and Armstrong (1999), frames privacy decisions as driven by risk-benefit calculations and fairness perceptions, but does not specify what managerial measurement criteria those calculations rely on in practice. This theme fills that gap: it shows that UK B2B SME managers evaluated sustainability through a combined threshold of commercial proxies pipeline movement, MQL-to-SQL conversion, and cost per lead alongside trust and governance signals such as complaint volume below 0.1 per cent, low opt-out rates, and clean annual audit outcomes. Neither commercial signals alone nor compliance signals alone were treated as sufficient. This dual-threshold finding extends RQ4 beyond the question of what metrics exist and toward the question of how managers combine them into a holistic viability judgement under conditions of attribution uncertainty and long B2B sales cycles.

5.2 Theme 2: Regulatory constraint as a filter

Participants described GDPR as a strategic filter applied before campaign design, not only after execution. Rather than treating regulation as a separate legal task, managers reported that GDPR shaped which data fields were collected, which audiences could be contacted, and which targeting options were acceptable before a campaign went live.

Participants consistently described a marked shift in practice between the pre- and post-GDPR periods. A Head of Marketing at a cybersecurity SME described pre-GDPR behaviour as: “We bought lists. All the time. Thousands of contacts from data brokers... Consent was a pre-ticked box nobody read.” A Head of Marketing at a B2B recruitment agency offered a parallel account: “You’d collect CVs at events, scan badges, and just add everyone to your database. No one asked permission... It was all about volume.” Both participants described GDPR as a disruption that forced a recalibration toward quality over volume.

In data collection, participants described a move toward explicit consent architecture. A Head of Marketing at a public sector cloud software provider gave a detailed account of how this was implemented: “We get it front and centre checkboxes on all sign-ups or downloads, explaining uses like ‘for relevant council updates’. Management’s in HubSpot: consents tagged, with auto-alerts for reviews.” Participants reported that these design choices affected both the volume of usable data and the quality of the segments they could build, with smaller but more responsive contact lists widely reported.

Participants also described a shift toward first-party and declared data. Instead of broad retargeting or weakly sourced contacts, they more often described using form responses, webinar sign-ups, downloads, and stated interests to build narrower role-based, sector-based, or high-intent segments.

The shift to first-party data was described not only as a compliance requirement but as a commercial improvement over time. A Head of Marketing at a cybersecurity SME reflected: “Now our database is smaller but way more engaged. Our sales team complains less about lead quality. It’s harder work, but the conversations are better. GDPR was painful but it made us grow up as marketers.” A Head of Marketing at a HR software SME echoed this pattern, describing a shift to role-based segmentation using declared CRM data job titles, organisation size, and webinar engagement as the foundation for targeted communications.

Consent configuration choices were described as practical responses to constraint. Participants reported relying on consent tagging, preference controls, and opt-out management in CRM workflows. This supports the idea GDPR narrowing the strategic menu before campaigns were built which raises the issue of how those choices were then carried out through platform settings appears more strongly in Theme 4.

This theme primarily addresses RQ1 and RQ3 and partially informs RQ2.

5.3 Theme 3: Resource constraint and selective enforcement

Participants described capability gaps and time scarcity as central constraints on privacy-performance execution. A Head of Marketing at a B2B recruitment agency gave a direct account of the burden: “I’m a team of two. Doing marketing for two audiences across multiple channels. Adding proper GDPR compliance on top consent tracking, data audits, retention management it’s a lot... I have to choose between the fancy compliance tool and funding the salary report.” This resource pressure was not unique to smaller teams: even participants at organisations with larger marketing functions described having to make explicit choices between compliance investment and campaign delivery.

Time scarcity also shaped where controls were applied most strictly. Participants reported prioritising high-risk journeys, key channels, and high-visibility campaigns when applying governance checks. Several also reported that long B2B sales cycles made compliant personalisation harder to judge quickly and harder to sustain over time.

Long B2B procurement cycles were a recurring barrier to performance measurement. A Head of Marketing at a public sector cloud software provider described this directly: “The endless procurement cycles in public sector are killer takes months to see if compliant personalisation even moves the needle.” A Head of Marketing at a cybersecurity SME described a related attribution problem: “When someone reads a blog post at home on their phone, then downloads a white paper from work six months later, then their colleague does a trial, then they buy how do you track that? You can’t. Not really.” The combination of cycle length and multi-touch journeys made clean attribution practically impossible for most participants.

Delegated compliance also appeared in this theme. Participants reported that large parts of consent handling, tracking limitation, retention routines, and simple approval or review checks were carried out through platform settings and vendor processes. Partner and tool integration work was described as an added burden because data had to be checked, synced, or cleaned across systems before campaigns could run safely.

When participants talked about pragmatic trade-offs, they did not describe them as rejection of privacy norms. They described them as constrained decisions made under short-term survival pressure, growth targets, and uncertainty. For example, one participant described pausing and rebuilding a campaign after concerns about consent in a partner list, then tightening controls before restarting. Participants described these trade-offs without apology, framing them as rational decisions under constraint rather than compliance failures. A Head of Marketing at a cybersecurity SME articulated this as: “The ‘good enough’ trap is real. We’re operating at maybe 70% of what’s possible. But 70% is better than nothing, and 100% would cost twice as much.” This framing of bounded

compliance as a deliberate strategic position rather than an oversight was a consistent pattern across participants operating under budget and team constraints.

This theme primarily addresses RQ2 and RQ3, and partially informs RQ4.

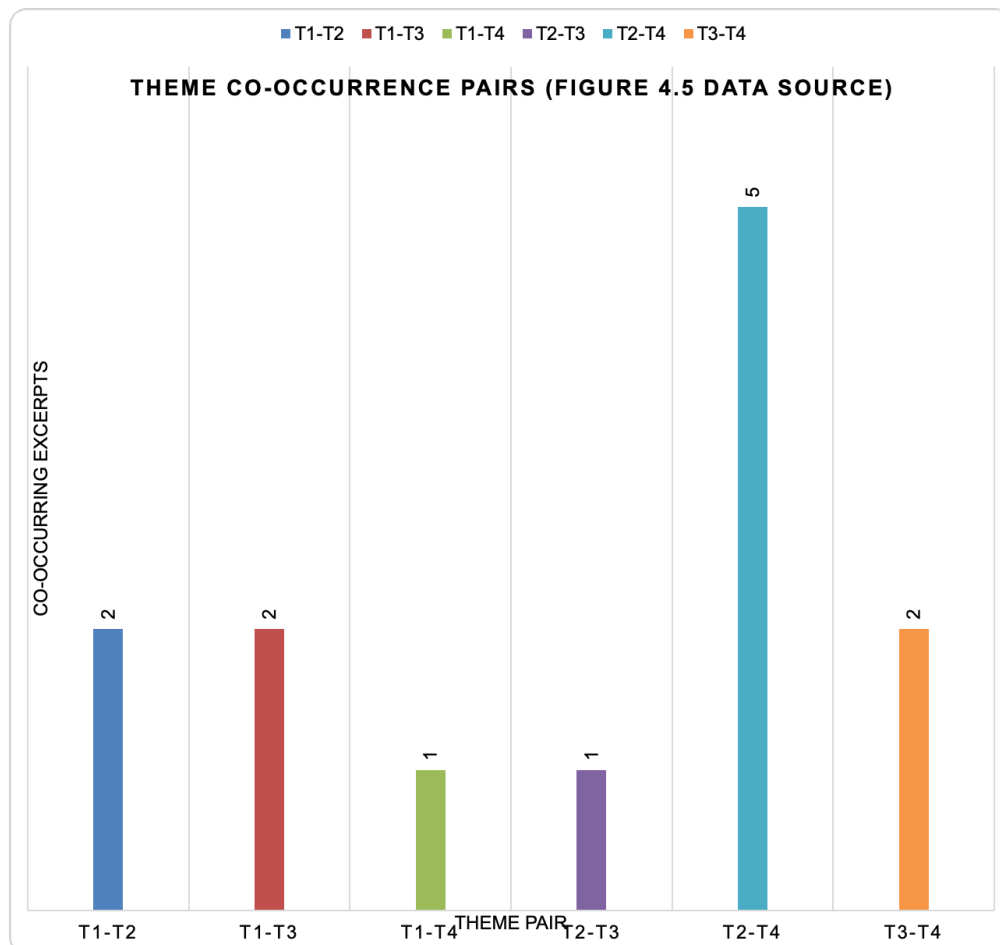


Figure 5.5 Theme co-occurrence matrix/network

Figure 5.5 shows that the four themes co-occur across the data but address distinct analytical dimensions. The strongest co-occurrence is between Theme 3 (resource constraints) and Theme 4 (platform governance), which reflects the practical reality that resource-constrained teams are most likely to rely on platform defaults for compliance. Theme 1 and Theme 2 co-occur where participants described GDPR compliance constraints shaping what performance outcomes were even feasible to pursue. The network structure does not imply that the themes are reducible to one another. It illustrates that SME privacy-performance management is a system of interacting constraints rather than a single decision.

5.4 Theme 4: Platform-Mediated Governance

A clear cross-case pattern was the extent to which governance behaviour was shaped by platform infrastructure. Participants reported that default settings, integration architecture, and vendor-configurable controls influenced what was feasible in daily compliance practice.

Participants offered concrete examples of platform-mediated governance in practice. A Head of Marketing at a cybersecurity SME described the preference centre as the single most practical tool for sustainable consent management: “The preference centre, hands down. Once it’s built, it runs itself. People manage their own data.

Fewer complaints. Better data quality. Minimal ongoing work.” This reliance on platform-embedded tools to distribute governance work was described as essential for small teams that could not sustain manual consent administration at scale.

Participants described this default reliance in practical terms: consent capture through CRM forms, preference management through platform workflows, analytics constrained by aggregated configurations, and campaign checks tied to existing system fields. Governance execution was therefore described as embedded in infrastructure use, not only in policy statements.

Campaign governance routines were similarly platform-anchored. A Head of Marketing at a cybersecurity SME described a five-minute pre-campaign checklist embedded in a project management tool: “Where did the list come from? Consent checked? Unsubscribe working? Tracking configured correctly? It lives in Asana, takes five minutes. Prevents so many headaches.” A Head of Marketing and CX at a manufacturing analytics SME described a comparable structure: “We’ve got quarterly audits, checklist, external audit.” Across cases, governance was not described as a separate compliance activity. It was described as a set of repeatable routines built into existing operational workflows.

Vendor dependence was also reported in relation to speed and risk. Participants described using platform capabilities to maintain consistency when internal capacity was limited. At the same time, they reported that vendor design and integration quality could reduce control precision. In practice, this influenced how quickly teams could respond to issues, test alternatives, or tighten controls.

Technical infrastructure was also described as shaping behaviour in edge cases. For example, one participant reported limited company-level enrichment while still avoiding individual-level third-party profiling. This suggests that governance choices were often calibrated within platform and capability boundaries rather than treated as all-or-nothing positions.

Participants in healthcare and professional services described comparable structures built around what was available to small teams. A Head of Marketing at a healthcare technology SME described their approach as: “Every campaign needs my approval with a compliance sign-off. It’s not super formal more checklists than full committees but it keeps us accountable at our scale.” This emphasis on proportionate governance routine enough to provide consistency, light enough not to block execution reflected a deliberate calibration to team size and operational capacity that was shared across the sample.

Taken together, participants described compliance practices as frequently mediated through platform defaults and vendor-provided configurations. See Appendix K for extended analysis figures and supporting tables.

This theme primarily addresses RQ3 and RQ2, and partially informs RQ4.

6.0 Discussion

6.1 Purpose of this chapter

This chapter explains what the findings mean in practical terms. Chapter 5 reported what participants said. This chapter interprets those results against the research questions and the literature. The focus is on how managers in UK-based B2B SMEs make privacy and performance decisions in real working conditions.

The discussion keeps the same boundaries set out in the methodology. It does not treat interview comments as legal judgements. It treats them as managerial accounts of how decisions are made under pressure, with limited resources, and through specific platform tools.

6.2 Interpreting Theme 1: Performance as managerial judgement

A clear pattern in the findings is that managers define success as continuation rather than as one campaign spike. Participants described success as the point where performance is strong enough to justify continued investment while trust and compliance risk remain manageable. In simple terms, the question was: can this approach continue safely and commercially?

Participants reported using mixed indicators to answer that question. They referred to pipeline movement, conversion quality, cost per lead, and engagement results. They also referred to complaint levels, opt-outs, and internal audit confidence. This supports the view that performance judgement in SMEs is multi-dimensional and includes both commercial and governance signals.

This pattern aligns with RQ4, which asks how managers evaluate sustainability and effectiveness. It also partly informs RQ1 because it shows how GDPR-related conditions changed what counts as acceptable performance. Managers no longer described data volume alone as success. They described quality, relevance, and operational control as central performance criteria.

This finding extends rather than simply confirms the privacy calculus model (Dinev & Hart, 2006). Where privacy calculus theorises a generalised cognitive trade-off between perceived benefits and perceived risks, the present findings implemented this trade-off through specific and observable managerial criteria: pipeline movement, MQL-to-SQL conversion, and cost per lead on the benefit side; complaint volume below 0.1 per cent, opt-out rates, and clean audit outcomes on the cost side. The calculus is not resolved through a single rational calculation but through an ongoing organisational accommodation, repeated across campaigns and adjusted as commercial and compliance conditions change. This supply-side extension of privacy calculus applied to marketing decision-makers rather than data subjects is a distinctive theoretical contribution of this study.

6.3 Interpreting Theme 2: Regulatory constraint as strategic filter

The findings suggest that GDPR is treated by participants as a practical filter at the start of campaign design. Managers reported that it shapes what data are collected, how consent is configured, and how far targeting can go. Regulation was therefore not described as a legal check added at the end. It narrowed the strategic menu before campaigns were built.

Participants repeatedly described explicit opt-in structures, clearer consent language, and stronger limits around tracking activity. They also reported relying more heavily on first-party data and reducing practices seen as too intrusive. Several accounts suggested lower broad reach but better fit with engaged audiences. Participants described this as a trade-off between scale and relevance.

This finding is consistent with earlier research on consent and tracking, although most of that research comes from website, consent-banner, or publisher-level studies rather than SME fieldwork (Utz et al., 2019; Bielova et al., 2024; Miller et al., 2025). The interview research adds a managerial layer by showing how those wider constraints are translated into everyday campaign design decisions in SMEs. From a procedural fairness perspective (Culnan & Armstrong, 1999), GDPR functions as an institutionalised mechanism for fair information practice: by compelling explicit consent architecture and restricting non-consensual tracking, regulation implemented the procedural fairness conditions that Culnan and Armstrong showed are prerequisite to impersonal trust. The present findings extend that model by showing that, in SME contexts, procedural fairness is not primarily achieved through deliberate managerial design but is imposed as a structural condition of operation. GDPR compels fair procedure rather than leaving it as a competitive choice, which changes both the motivation and the consistency with which fair practices are maintained.

6.4 Interpreting Theme 3: Resource constraint and selective enforcement

The findings show that capability limits are central to how privacy-performance choices are made. Participants described small teams, limited time, and uneven specialist support. Under those conditions, managers reported prioritising controls by risk and impact rather than applying the same depth of control to every activity.

This helps explain why selective enforcement appears in practice. Participants did not describe it as ignoring privacy principles. They described it as prioritising under constraint: applying stricter checks where risk was higher, and simpler controls where risk was lower. This reflects short-term survival logic and risk management under uncertainty.

From a privacy calculus perspective (Dinev & Hart, 2006), this finding has direct implications for how the cost side of the trade-off should be understood in organisational settings. Privacy risk in the original model is framed as a cognitive perception held by individual data subjects. The present findings suggest that in SME contexts, the cost of privacy-compliant personalisation is not merely perceived it is materially shaped by team capacity, budget, and platform capability. Resource-constrained teams face a higher operational cost for equivalent levels of compliance rigour, which means the calculus is structurally asymmetric: the governance burden of sustaining personalisation is substantially heavier for smaller organisations than the consumer-facing model assumes. This organisational dimension of privacy cost is not addressed in the original privacy calculus framework and represents a meaningful extension of it. This finding directly informs RQ2 and RQ3.

6.5 Interpreting Theme 4: Platform-mediated governance

One of the strongest contributions from the findings is the role of platform infrastructure in compliance practice. This differs from Theme 2. Theme 2 is about how GDPR narrows strategic choices before campaign design, whereas Theme 4 is about how those choices are carried out through platforms in daily operations. Participants reported relying on CRM systems, analytics tools, consent tools, and channel defaults to implement everyday governance.

It is worth noting a limitation on the data minimisation dimension here. Research by Biega et al. (2020) and Leysen et al. (2025) demonstrates that significant reductions in data collection are feasible without catastrophic loss of

personalisation quality. However, those findings come from algorithmic recommendation systems operating at scale, not from the CRM-led, email-based, and role-segmented approaches that the participants in this study described. The principle that less data can still support acceptable personalisation is directionally applicable to SME practice, but the specific technical mechanisms (inference-time feature reduction in machine-learning pipelines) are not directly transferable to the manual or semi-automated workflows that SME marketing teams use. This distinction is relevant to how the theoretical contribution of Theme 4 should be understood: the platform governance finding is grounded in reported practice, not in algorithmic performance benchmarks.

This can be interpreted as delegated governance or platform-mediated compliance. Managers remain accountable, but practical control is partly exercised through vendor-provided settings and workflows. Participants described this as necessary under capability constraints, especially where dedicated legal or technical resources were limited.

This observation also helps explain variation in practice quality. Where platform settings were clear and well managed, participants reported more confidence and consistency. Where integrations were complex or partner controls were weaker, participants reported more uncertainty and reactive adjustment. This makes platform dependence an important part of the SME privacy-performance balance.

6.6 Theoretical contribution

The literature often explains privacy-performance trade-offs through privacy calculus and fairness perceptions (Dinev & Hart, 2006; Culnan & Armstrong, 1999). The findings support that logic, but they also show that organisational conditions shape whether those principles can be implemented consistently in SMEs.

The study therefore offers a bounded extension. In UK-based B2B SMEs, privacy-performance balance is not only a cognitive trade-off and not only a legal requirement. It is also an organisational viability problem shaped by capability limits, platform infrastructure, and regulatory architecture. This extension stays within the research and does not claim universal causality beyond the sample.

First, the study extends privacy calculus theory (Dinev & Hart, 2006; Malhotra et al., 2004) from the consumer side to the organisational side. Privacy calculus has predominantly been applied to explain why consumers do or do not disclose personal information, framing the decision as a cognitive trade-off between perceived benefits and perceived risks. This study applies equivalent logic to SME marketing decision-makers, who face a parallel trade-off: they must weigh the commercial benefit of personalisation against the governance cost of maintaining compliant consent, data minimisation, and retention routines. The findings suggest that for SME managers, this trade-off is not resolved by a single rational calculation but by an ongoing organisational accommodation a series of practical compromises shaped by capability limits, platform dependence, and regulatory pressure.

Second, the study extends Culnan and Armstrong's (1999) procedural fairness model into an infrastructure-mediated context. Culnan and Armstrong showed that explicitly communicating fair information practices overcomes privacy objections and builds impersonal trust. The present findings confirm that fair procedures are central to sustainable practice, but they reveal an important contextual condition: in SMEs, procedural fairness is frequently delegated to platform architecture rather than enacted through deliberate managerial design. Participants described consent tagging, auto-alerts, and retention controls embedded in HubSpot workflows as the primary mechanism through which fairness was implemented. This suggests that vendor infrastructure functions as a governance actor, and that the quality of procedural fairness in SME contexts depends substantially on the defaults and capabilities of the marketing technology stack a condition not addressed in the original model.

Third, the study adds an organisational dimension to GDPR compliance frameworks developed for SMEs (Brodin, 2019; Joswig & Kurz, 2025). Those frameworks emphasise knowledge gaps and process deficiencies as the primary barriers to compliance. The present findings extend that explanation by showing that governance quality is not simply a product of awareness or intent it is substantially mediated by team size, budget, and the capabilities embedded in the platforms that small teams depend on. Participants did not describe governance as a deliberate design exercise but as an emergent property of operational necessity, constrained by what their infrastructure could support and what their time allowed. This distinction has implications for how compliance frameworks are designed: guidance that assumes deliberate process design may be poorly calibrated for organisations where governance is primarily infrastructure-led.

6.7 Practical implications for SME managers

For managers, the findings suggest that simple robust routines are often more sustainable than ambitious complex systems. Participants described workable practices such as clear opt-in design, first-party segmentation, periodic data clean-up, campaign checklists, and regular review of opt-outs and complaints.

The findings also suggest that tool decisions should be treated as governance decisions, not only as performance decisions. If compliance is implemented through platform settings, then documentation, ownership, review cadence, and partner checks become essential management activities.

A further practical implication is that performance and trust should be managed together. Participants reported better continuity when they monitored commercial and governance indicators in parallel rather than treating compliance as a separate task disconnected from performance management.

6.8 Discussion summary

Overall, the discussion shows that participants described GDPR as a real strategic constraint, but not as a barrier to all personalisation. They reported adapting by narrowing scope, strengthening consent practice, and using infrastructure-led governance.

The research suggests that the central challenge is sustainability under constraint. Managers reported that success depends on balancing growth expectations with practical governance capacity, platform dependence, and trust protection. The next chapter concludes by summarising the study's contributions, limitations, and future research priorities.

7.0 Conclusion

7.1 Study summary

This dissertation examined how B2B SMEs based in the UK balance personalised marketing and privacy requirements under GDPR. The study used qualitative interviews with marketing decision-makers and focused on practical implementation choices rather than technical system optimisation.

The analysis showed that participants described GDPR as shaping strategy, data use, and targeting choices. It also showed that managers evaluate success through a combined lens of commercial outcomes, trust signals, and governance confidence.

7.2 Answers to the research questions

Research question 1: Research question 1: How has GDPR altered SME personalisation practices? Participants reported a move away from broad tracking and weak-consent approaches towards explicit opt-in, clearer data-use language, and narrower targeting based on declared interests and high-intent contexts. This shift was described consistently as a trade-off between scale and relevance: database sizes contracted but engagement quality and sales team confidence in lead quality improved in parallel.

Research question 2: What barriers limit SME compliance and marketing performance? Participants reported capability gaps, time scarcity, long B2B sales cycles, and partner or tool integration work as barriers that made compliant execution harder to sustain. A further compounding barrier was attribution uncertainty: long B2B procurement cycles and multi-touch, cross-device journeys made it difficult to isolate the contribution of any individual personalisation decision to pipeline outcomes. This meant that even where managers were confident in their consent and governance practices, they lacked the measurement infrastructure to demonstrate commercial return with precision, which in turn made it harder to justify increased compliance investment to senior stakeholders.

Research question 3: Which consent, minimisation, and governance choices are viable in practice for SMEs? Participants reported that viable choices included clear consent design, consent tagging and opt-out controls in CRM workflows, narrower targeting, selective governance checks, and platform-supported retention routines. The viability of these choices depended less on technical sophistication than on their fit with existing operational capacity: practices embedded in platform workflows such as consent tagging in HubSpot or campaign checklists in Asana were described as more sustainable than practices requiring dedicated specialist time. Participants consistently described governance as an emergent property of platform use rather than a separately designed compliance programme.

Research question 4: What is needed to evaluate sustainability and effectiveness? Participants reported judging sustainability through both commercial signals and trust or compliance signals such as complaints, opt-outs, unsubscribe patterns, and audit confidence. No participant relied on a single metric. Instead, sustainability was described as a holistic threshold judgement: an approach was considered sustainable when it generated sufficient commercial movement typically measured through pipeline contribution and conversion rate proxies while keeping trust and compliance indicators below acceptable risk thresholds. This combined-threshold logic was described as

ongoing and adaptive rather than fixed, with managers adjusting their criteria as campaigns evolved and as regulatory or platform conditions changed.

7.3 Contributions, limitations, and future research directions

The study makes an empirical contribution by providing current interview-based research from UK B2B SME marketing leaders on how GDPR shapes personalisation decisions in daily operations. It shows how managers prioritise under constraint, what governance routines are maintainable, and how performance and trust signals are used together as sustainability criteria. This kind of practitioner-level research is absent from the existing GDPR literature, which focuses primarily on consumer behaviour, platform tracking, and legal compliance frameworks. A limitation of this empirical contribution is that the sample is qualitative and purposive: eleven participants from UK-based B2B SMEs. The findings cannot be statistically generalised across sectors, firm sizes, or countries. Future research should test these findings in larger samples and across different regulatory environments to assess how far the governance routines described here transfer to other contexts.

The study makes a theoretical contribution by extending the privacy calculus framework from the consumer side to the organisational side, by showing that procedural fairness in SME contexts is substantially mediated by platform infrastructure rather than deliberate design, and by adding an organisational capacity dimension to existing SME compliance frameworks (Brodin, 2019; Joswig & Kurz, 2025). A limitation of this theoretical contribution is that it is bounded by the interview context: the extensions are grounded in reported managerial accounts, not in observational data, audited compliance records, or experimental settings. Future research could develop and test a supply-side privacy calculus model with quantitative measures.

The study also makes a methodological contribution by demonstrating that reflexive thematic analysis (Braun & Clarke, 2006) is well-suited to research on SME marketing practice, where decision logic is often tacit, contextual, and resistant to standardised measurement. The three-cycle coding approach from open codes through theme construction to rival interpretation checking enabled analytical rigour while remaining grounded in participant language. A limitation here is that the analysis relies on the researcher's interpretive judgement. While reflexivity measures were applied throughout, the findings remain one interpretive reading of the data. Future research using multiple coders, or structured validation workshops with practitioners, could improve the dependability and confirmability of findings in this area.

7.4 Conclusion

Together, the contributions, limitations, and research directions set out in Section 7.3 frame the central conclusion of this study.

The study examined how UK-based B2B SMEs balance personalised marketing with GDPR privacy requirements. Eleven semi-structured interviews with marketing decision-makers produced four themes that together describe a coherent pattern of privacy-performance management under constraint. The findings suggest that managers did not experience GDPR as a binary choice between growth and compliance. They built operational routines that held both requirements together, using consent architecture, first-party data, platform governance, and mixed performance indicators to maintain momentum within the limits that regulation and resources imposed.

The central conclusion is that GDPR-compliant personalisation is achievable for B2B SMEs, but it is not automatic. It requires deliberate consent design, discipline around data collection, governance routines that can be sustained by small teams, and a management mindset that treats privacy and performance as interdependent rather than competing. Where those conditions exist, the findings suggest that personalised marketing can continue effectively

within GDPR constraints. Where they do not, the risk is not only regulatory but commercial: eroded trust, lower consent rates, and reduced campaign effectiveness over time. reviews the literature through mechanisms that can be translated into practical decisions for smaller organisations .

1.4 The research method used in this study

This study used a qualitative design based on 10-15 semi-structured interviews with marketing decision-makers working in B2B SMEs in the UK (Malterud, Siersma & Guassora, 2016). Interviews are appropriate because they allow the study to explore how practitioners interpret GDPR, manage consent, and balance personalisation with privacy in day-to-day practice (Malterud, Siersma & Guassora, 2016). Data collection took place online and continued until thematic saturation was reached. (Malterud, Siersma & Guassora, 2016). This design prioritises depth and context over breadth, which fits both the research aim and the scale of an MSc dissertation.

This dissertation is structured as follows. Chapter 2 reviews the relevant literature on privacy calculus and trust, GDPR's impact on tracking and consent practice, data minimisation, and ethical governance in AI-enabled personalisation. Chapter 3 presents the conceptual framework, introducing four analytical lenses and setting out the research aim, objectives, and questions. Chapter 4 describes the methodology, including the research philosophy, sampling strategy, recruitment process, data collection, and analysis approach. Chapter 5 presents the findings from eleven semi-structured interviews with UK B2B SME marketing decision-makers, organised around four themes. Chapter 6 discusses the findings in relation to the existing literature and the conceptual framework. Chapter 7 concludes the study by answering the research questions and reflecting on theoretical and practical contributions, limitations, and directions for future research.

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Appendix A: Ethics approval and research governance record



College of Social Sciences

Ethics Committee for Non-Clinical Research Involving Human Subjects

Notification of Ethics Application Outcome – PGT Student Applications & PGT MGT ODL (Group Ethical Approval Process)

Application Details

Postgraduate Ethics Application ☐ Postgraduate ODL Student Research Ethics Application ☒

Programme: MSc Marketing ODL

Supervisor: Francesca Dall'Olimo Riley

Applicant's Name: Alvin Kibalama

Application Status: Fully Approved

Date of Review: 02/02/2026

Start Date of Approval

02/02/2026

End Date of Approval

14/03/2026

NB: Only if the applicant has been given approval can they proceed with their data collection with effect from the date of approval.

Permission to Survey Students or Staff of the University of Glasgow.

If students within the College of Social Sciences of the University of Glasgow are involved as participants in your research, approval must be obtained from:

- the Head of the School if students from only one School are involved
- the Dean of Graduate Studies: Professor Irene-Marie Esser (designated by the Head of College) if students from more than one School in the College are involved
- If students from more than one College are to be involved, permission must be obtained from the Clerk of Senate. You should refer to the [Senate Office Policy on Student Surveys](#)

If you intend to recruit students via email, permission to contact groups of students should be sought from the University Postmaster by emailing postmaster@glg.ac.uk

Normally permission to conduct research with students should be sought after ethical approval is granted.

Please retain this notification for future reference. If you have any enquiries, please email: business-ethics-applications@glasgow.ac.uk

University of Glasgow

College of Social Sciences

Glasgow G12 8QQ

The University of Glasgow, charity number SC004401

E-mail: business-ethics-applications@glasgow.ac.uk

Ethics Committee for Non-Clinical Research Involving Human Subjects

Notification of Ethics Application Outcome – PGT Student Applications & PGT MGT ODL (Group Ethical Approval Process)

Application Details

Postgraduate Ethics Application ☐ Postgraduate ODL Student Research Ethics Application ☒

Programme: MSc Marketing ODL

Supervisor: Francesca Dall'Olmo Riley

Applicant's Name: Alvin Kibalama

Application Status: Fully Approved

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- the Head of the School if students from only one School are involved
- the Dean of Graduate Studies: Professor Irene-Marie Esser (designated by the Head of College) if students from more than one School in the College are involved
- If students from more than one College are to be involved, permission must be obtained from the Clerk of Senate. You should refer to the [Senate Office Policy on Student Surveys](#)

If you intend to recruit students via email, permission to contact groups of students should be sought from the University Postmaster by emailing postmaster@gla.ac.uk

Normally permission to conduct research with students should be sought after ethical approval is granted.

Please retain this notification for future reference. If you have any enquiries,

please email: business-ethics-applications@glasgow.ac.uk

University of Glasgow

College of Social Sciences

Glasgow G12 8QQ

The University of Glasgow, charity number SC004401

E-mail: business-ethics-applications@glasgow.ac.uk

Appendix B: Participant information sheet

1. Study title and researcher details

Title of project: How can SMEs balance privacy and performance to achieve effective personalised marketing under GDPR

Programme: MSc Marketing Dissertation Research Project

Student researcher: Alvin Kibalama

Email: 2669162K@student.gla.ac.uk

Dissertation supervisor: Francesca Dall'Omo Riley

Supervisor email: Francesca.Riley@glasgow.ac.uk

2. Invitation

You are being invited to take part in a research study. Before you decide, it is important that you understand why the research is being done and what taking part would involve. Please read the information below carefully and take time to decide whether you would like to participate.

3. What is the purpose of the study?

This dissertation examines how B2B SMEs in the UK balance personalised marketing with GDPR privacy requirements. The study focuses on the practical choices managers make around consent, data minimisation, governance routines, targeting, and performance under resource constraints.

The dissertation is due for submission on 23 March 2026.

4. Why have I been chosen?

You have been invited because you work in a B2B SME in the UK and have active responsibility for marketing, customer data use, consent decisions, campaign execution, or related governance activity. The study is interested in informed managerial accounts rather than general opinions.

5. Do I have to take part?

No. Taking part is entirely voluntary. If you agree to participate, you may still withdraw up to 14 days after the interview, provided anonymisation and coding have not already been completed. You may also decline to answer any question during the interview without giving a reason.

6. What will happen if I take part?

If you agree to take part, you will be invited to one online semi-structured interview lasting approximately 45 to 60 minutes. With your permission, the interview will be audio-recorded so that it can be transcribed accurately. The questions will focus on personalised marketing practices, GDPR, consent, targeting, data minimisation, governance routines, organisational constraints, and how success is judged in practice. No special preparation is required and you should not share any confidential commercial information that you are not comfortable discussing.

7. Are there any risks or disadvantages?

The study does not involve physical risk. However, some questions may touch on internal marketing processes, governance routines, or resource constraints. If any question feels commercially sensitive or uncomfortable, you may choose not to answer it. The interview is designed to discuss practices at an appropriate professional level rather than to collect confidential business secrets.

8. Will my taking part be kept confidential?

All information collected during the research will be handled confidentially. Participants will be identified through anonymised participant codes rather than by name. Names, company-specific identifiers, and other direct personal details will be removed or reduced in transcripts and reporting where possible. Because some participants may hold distinctive senior roles in niche sectors, complete anonymity cannot be guaranteed in every context, but the dissertation will take reasonable steps to minimise identification risk.

9. What will happen to the results of the study?

The findings will be used in the MSc Marketing dissertation. Anonymised quotations may be used in the written analysis to illustrate themes. Participants will not be directly named. A short summary of the dissertation findings can be provided on request after the dissertation has been assessed.

10. How will my data be stored and used?

Audio files, transcripts, and analysis materials will be stored securely and access will be restricted to the researcher. Personal identifying information will be separated from the analytical material as far as possible. Data handling will follow the study privacy notice and the University procedures applied to the dissertation research process.

11. Who has reviewed the study?

The study materials were prepared using the Adam Smith Business School MSc Marketing dissertation ethics process and participant documentation templates. The dissertation research follows the School procedures that apply to primary research involving interviews.

12. Contact for further information

Primary researcher: Alvin Kibalama, 2669162K@student.gla.ac.uk

Dissertation supervisor: Francesca Dall'Olmo Riley, Francesca.Riley@glasgow.ac.uk

If you have concerns about the conduct of the research, you may also use the Adam Smith Business School ethics contact route that applies to the dissertation process in place at the time of the study.

Thank you for reading this information sheet.

Appendix C: Participant consent form

Title of project: How can SMEs balance privacy and performance to achieve effective personalised marketing under GDPR

Researcher: Alvin Kibalama

Dissertation supervisor: Francesca Dall'Olmo Riley

Please read each statement carefully and initial or tick each box if you agree.

- I confirm that I have read and understood the Participant Information Sheet for this study and have had the opportunity to ask questions.
- I understand that my participation is voluntary and that I may withdraw up to 14 days after the interview, provided anonymisation and coding have not already been completed.
- I understand that I may refuse to answer any individual question without giving a reason.
- I understand that the interview will focus on professional practice in relation to personalised marketing, GDPR, consent, governance, and performance judgement.
- I understand that anonymised quotations from my interview may be used in the dissertation.
- I understand that my name and identifying details will be removed or reduced where possible, although complete anonymity cannot be guaranteed in every context.
- I understand that research data will be stored securely and handled in line with the study privacy arrangements.
- I agree to take part in this research study.

Audio recording consent

- I consent to the interview being audio-recorded for transcription and analysis purposes.
- I do not consent to audio recording. If this option is chosen, the interview would not proceed in its planned form.

Participant name: _____

Participant signature: _____

Date: _____

Researcher name: Alvin Kibalama

Researcher signature: _____

Date: _____

End of consent form

Appendix D: Semi-structured interview guide

How can SMEs balance privacy and performance to achieve effective personalised marketing under GDPR

Researcher: Alvin Kibalama

Supervisor: Francesca Dall'Olmo Riley

Estimated duration: 45-60 minutes

Mode: Online interview (audio-recorded with consent)

1. Purpose of the interview guide

This guide was designed to support the semi-structured interviews used in the dissertation. The guide was intended to keep coverage consistent across participants while allowing follow-up probes when respondents raised sector-specific or tool-specific issues. The interview was built around the four research questions and the practical focus of the dissertation.

2. Opening script

Thank you for taking part. Before we begin, I would like to confirm that you have read the Participant Information Sheet and that you are happy to proceed. Your participation is voluntary, you may skip any question, and you may withdraw within the stated withdrawal period. With your permission, I will audio-record the interview to support accurate transcription.

3. Main interview schedule

Section A: Warm-up and context

Purpose of this section: This section confirms respondent fit and builds contextual understanding.

1. Can you describe your role and the types of marketing activity you manage?

- Follow up questions: Can you give a recent example? What changed in practice as a result?

2. How does your organisation currently use personalisation in marketing?

- Follow up questions: Can you give a recent example? What changed in practice as a result?

3. What kinds of customer or prospect data do you typically rely on for these activities?

- Follow up questions: Can you give a recent example? What changed in practice as a result?

Section B: GDPR-related change in personalisation practice (RQ1)

This section focuses on gathering evidence of operational changes what companies actually do rather than merely collecting general opinions.

4. Thinking back to before GDPR, how did your personalisation approach work then, and how does it work now?

- Follow up questions: Can you give a recent example? What changed in practice as a result?

5. What specific changes have you made to data collection, tracking, targeting, or segmentation because of GDPR?

- Follow up questions: Can you give a recent example? What changed in practice as a result?

6. Which personalisation practices have you reduced, stopped, or redesigned due to GDPR requirements?

- Follow up questions: Can you give a recent example? What changed in practice as a result?

Section C: Barriers and constraints (RQ2)

This section aims to explore the limitations related to organisation, technology, and performance measurement.

7. What are the main barriers you face in implementing GDPR-compliant personalisation?

- Follow up questions: Can you give a recent example? What changed in practice as a result?

8. How do budget, people, skills, and tools affect what you can realistically do?

- Follow up questions: Can you give a recent example? What changed in practice as a result?

9. Are there platform or vendor limitations that make compliance or performance harder?

- Follow up questions: Can you give a recent example? What changed in practice as a result?

10. Can you share an example of a compliance or performance challenge and how you handled it?

- Follow up questions: Can you give a recent example? What changed in practice as a result?

Section D: Practical consent, minimisation, and governance choices (RQ3)

This section aims to find out which practices respondents consider practical and sustainable in their daily work.

11. How do you obtain and manage consent for personalisation activities?

- Follow up questions: Can you give a recent example? What changed in practice as a result?

12. What transparency or messaging practices do you use to explain data use to customers?

- Follow up questions: Can you give a recent example? What changed in practice as a result?

13. How do you decide which data is necessary and which data to minimise or exclude?

- Follow up questions: Can you give a recent example? What changed in practice as a result?

14. What governance practices do you use, such as approvals, checklists, training, retention rules, or audits?

- Follow up questions: Can you give a recent example? What changed in practice as a result?

15. Which of these practices feel most practical and sustainable for your organisation, and why?

- Follow up questions: Can you give a recent example? What changed in practice as a result?

Section E: Sustainability and effectiveness judgement (RQ4)

This section aims to identify the criteria managers use to judge performance and the logic they apply to decide whether to continue a process or campaign.

16. How do you evaluate whether your consent and privacy practices are working as intended?

- Follow up questions: Can you give a recent example? What changed in practice as a result?

17. Which KPIs or outcomes matter most when judging personalisation performance?

- Follow up questions: Can you give a recent example? What changed in practice as a result?

18. What evidence would convince you that your current approach is sustainable and compliant over time?

- Follow up questions: Can you give a recent example? What changed in practice as a result?

19. How do trust, complaints, opt-outs, or customer feedback influence decisions over time?

- Follow up questions: Can you give a recent example? What changed in practice as a result?

20. Can you share an example where personalisation improved performance while staying compliant? What made it work?

- Follow up questions: Can you give a recent example? What changed in practice as a result?

Closing question

This section is designed to formally conclude the interview and confirm all necessary next steps with the participant.

21. Is there anything else you would like to add that we have not covered?

- Follow-up question: Can you give a recent example? What changed in practice as a result?

4. Research question alignment summary

Research question	Interview section	Type of research sought
RQ1	Section B	Accounts of change in tracking, targeting, segmentation, and consent-led personalisation after GDPR.
RQ2	Section C	Operational, financial, skills, measurement, and platform barriers.
RQ3	Section D	Practical consent, transparency, minimisation, and governance routines described as workable.
RQ4	Section E	Indicators, metrics, trust signals, and continuation thresholds used to judge viability.

Appendix E: Recruitment process and eligibility Criteria

How can SMEs balance privacy and performance to achieve effective personalised marketing under GDPR

This appendix sets out the recruitment logic, eligibility criteria, outreach channels, and invitation wording used to support the interview study described in Chapter 3.

1. Purpose of this appendix

The purpose of this appendix is to show how potential participants were identified, approached, screened, and invited to take part in the study. It supports the sampling and recruitment sections of the methodology chapter.

2. Inclusion criteria

- UK-based professional working in an SME context.
- Active responsibility for marketing decisions, customer data use, consent configuration, campaign execution, or related governance activity.
- B2B organisational focus relevant to the dissertation topic.
- At least 12 months of relevant role experience.
- Willingness to take part in an online semi-structured interview lasting approximately 45 to 60 minutes.

3. Exclusion criteria

- Professionals based outside the UK.
- Pure B2C roles with no B2B decision-making relevance.
- Roles without meaningful authority over consent, data use, targeting, campaign execution, or governance practice.
- Respondents unable to discuss current or recent organisational practice in sufficient detail.

4. Recruitment channels used and planned

- Professional network contacts relevant to B2B SME marketing practices in the UK.
- Targeted LinkedIn outreach to eligible marketing decision-makers.
- Direct email invitations where a professional contact route was available.
- SME associations and related business networks where relevant gatekeepers or contacts could be identified.

These channels match the recruitment approach described in Section 4.7 of the methodology chapter.

5. Recruitment workflow

- Identify potential participants whose role and organisation fit the study scope.
- Check basic fit against the inclusion and exclusion criteria before outreach.
- Send an invitation through LinkedIn or email using the study summary below.
- Provide the Participant Information Sheet, Consent Form, and Privacy Notice to interested respondents before the interview is scheduled.
- Confirm interview timing, explain recording arrangements, and restate the voluntary nature of participation.
- Maintain a recruitment log to monitor sector spread, role spread, and any obvious sampling gaps.

6. Recruitment invitation text

Subject: Invitation to participate in MSc Marketing dissertation interview

Hello [Name],

I am an MSc Marketing student at the University of Glasgow and I am conducting dissertation research on how B2B SMEs balance personalised marketing performance with GDPR privacy requirements.

I am inviting you to take part in one online semi-structured interview lasting approximately 45 to 60 minutes. With your permission, the interview would be audio-recorded to support accurate transcription and analysis.

Participation is voluntary. You may decline to answer any question and you may withdraw within the period stated in the Participant Information Sheet.

If you are interested, please reply to this message and I will share the Participant Information Sheet, Consent Form, Privacy Notice, and available scheduling options.

Kind regards,

Alvin Kibalama

MSc Marketing, University of Glasgow

Email: 2669162K@student.gla.ac.uk

Supervisor: Francesca Dall'Olmo Riley, Francesca.Riley@glasgow.ac.uk

7. Recruitment monitoring note

A recruitment log was maintained to record response status, transcript completion, and anonymisation status. In the dissertation, the log was used to support sample transparency and to monitor whether the emerging interview set continued to reflect the intended focus on B2B SMEs in the UK.

Appendix F: Participant profile and sample composition

How can SMEs balance privacy and performance to achieve effective personalised marketing under GDPR

This appendix summarises the interview sample in anonymised form. Personal names and company names have been removed for anonymity.

1. Sample overview

- Total completed interviews: 11
- Geographic scope: UK-based B2B SMEs
- Respondent type: marketing decision-makers with active involvement in consent, targeting, data use, campaign execution, or governance decisions
- Method: online semi-structured interviews, audio-recorded with consent and transcribed for analysis

2. Anonymised participant table

Participant code	Role group	Organisation type	Inclusion basis	Interview month	Data status
P01	Head of Marketing	B2B technology / software	B2B SME marketing decision-maker in the UK	2026-02	Interview and transcript available
P02	Head of Marketing	B2B technology / software	B2B SME marketing decision-maker in the UK	2026-02	Interview and transcript available
P03	Head of Marketing	B2B recruitment / talent services	B2B SME marketing decision-maker in the UK	2026-03	Interview and transcript available
P04	Head of Marketing	B2B manufacturing / industrial	B2B SME marketing decision-maker in the UK	2026-03	Interview and transcript available
P05	Head of Marketing	B2B technology / software	B2B SME marketing decision-maker in the UK	2026-03	Interview and transcript available
P06	Chief Marketing Officer	B2B technology / software	B2B SME marketing decision-maker in the UK	2026-03	Interview and transcript available
P07	Head of Marketing & CX	B2B technology / software	B2B SME marketing decision-maker in the UK	2026-03	Interview and transcript available
P08	Chief Marketing Officer	B2B technology / software	B2B SME marketing decision-maker in the UK	2026-03	Interview and transcript available
P09	Head of Marketing	B2B logistics / fulfilment	B2B SME marketing decision-maker in the UK	2026-03	Interview and transcript available
P10	Marketing Director	B2B technology / software	B2B SME marketing decision-maker in the UK	2026-03	Interview and transcript available
P11	Head of Marketing	B2B technology / software	B2B SME marketing decision-maker in the UK	2026-03	Interview and transcript available

3. Role distribution

Role group	Count
Head of Marketing	7
Chief Marketing Officer	2
Marketing Director	1
Head of Marketing & CX	1

4. Organisation type distribution

Organisation type	Count
B2B logistics / fulfilment	1
B2B manufacturing / industrial	1
B2B recruitment / talent services	1
B2B technology / software	8

5. Inclusion logic used for this appendix

Participants were retained in the sample where the transcript and recruitment log indicated that they were UK-based professionals working in B2B SME contexts and held active responsibility for marketing or closely related data and campaign decisions. The appendix presents an anonymised profile view only and does not reproduce company names.

Appendix G: Research question to interview question mapping

How can SMEs balance privacy and performance to achieve effective personalised marketing under GDPR

This appendix expands on the research question mapping used in the methodology chapter. It shows how the theoretical framing, interview guide, and expected research were aligned in the study design.

1. Full mapping table

Research question	Theoretical constructs	Interview section / question group	Expected research	Linked appendix material
RQ1: How has GDPR altered SME personalisation practices?	GDPR boundary conditions; consent friction; tracking reduction; first-party data reliance.	Appendix D, Section B, Questions 4-6.	Accounts of change in tracking, targeting, segmentation, consent wording, and post-GDPR campaign design.	Appendix D; Appendix J; Appendix K.
RQ2: What barriers limit SME compliance and marketing performance?	SME resource constraints; platform dependence; procedural fairness pressures; measurement limits.	Appendix D, Section C, Questions 7-10.	Constraint accounts, trade-off narratives, compliance incidents, platform limitations, and negative cases.	Appendix D; Appendix F; Appendix I; Appendix J.
RQ3: Which consent, minimisation, and governance choices are viable in practice for SMEs?	Privacy calculus; procedural fairness; minimisation feasibility; platform-mediated governance.	Appendix D, Section D, Questions 11-15.	Descriptions of consent routines, minimisation choices, governance processes, and practices treated as workable in day-to-day use.	Appendix D; Appendix H; Appendix I; Appendix J; Appendix L.
RQ4: What is needed to evaluate the sustainability and effectiveness of SME consent, minimisation, and governance choices?	Managerial judgement; continuation thresholds; trust and feedback signals; mixed performance criteria.	Appendix D, Section E, Questions 16-20.	Indicators, metrics, audit signals, complaints, opt-outs, and continuation logic used to judge whether a practice can be sustained over time.	Appendix D; Appendix H; Appendix I; Appendix J; Appendix K.

2. Notes on use

- The mapping was used to keep the interview guide focused on research relevant to the dissertation aims rather than on broad opinions about GDPR.
- Theoretical constructs were used as framing devices rather than as rigid coding categories during the first cycle of analysis.
- The appendix should be read alongside Appendix D for the full interview schedule and Appendices H and I for the later analysis trail.

Appendix H: Interview analysis codebook

How can SMEs balance privacy and performance to achieve effective personalised marketing under GDPR

This appendix presents the codebook used to move from interview material to the four final dissertation themes.

1. Codebook scope

The analysis was based on direct quotes from interviews, focusing on how managers actually work specifically their day-to-day practices, operational challenges, the rules they follow, and how they judge success.

The interview results were analysed in three steps:

1. Initial Coding (Cycle 1): Giving initial labels to key concepts.
2. Theme Building (Cycle 2): Grouping those labels into broader themes.
3. Refinement (Cycle 3): Checking the themes against contradictory evidence to make sure they were accurate.

The four main themes that resulted from this analysis were:

- Performance as managerial judgement
- Regulatory constraint as a strategic filter
- Limited resources and practical trade-offs
- Governance controlled by the software platform

2. Codebook

Code	Working definition	Include when	Exclude when	Final dissertation theme
Commercial performance indicators	References to pipeline contribution, lead quality, conversion, CAC/CPA, engagement, or sales feedback used to judge personalisation outcomes.	Mentions of commercial outcomes or performance metrics.	General positive or negative comments with no metric or judgement logic.	Theme 1
Continuation thresholds	Statements about whether a campaign or routine could continue safely or should be paused, rebuilt, or stopped.	References to continuation logic, audit cleanliness, incident tolerance, or stopping rules.	Single campaign results without continuation judgement.	Theme 1
Trust and feedback signals	Use of complaints, opt-outs, unsubscribes, spam signals, or direct customer feedback as part of performance judgement.	Explicit references to user feedback shaping evaluation.	General trust language with no operational signal.	Theme 1

Gdpr filters data collection	Accounts of GDPR narrowing what data can be collected or used before a campaign goes live.	Mentions of legal or policy filtering of data choices.	General GDPR mention without strategic consequence.	Theme 2
Consent wording and targeting scope	Accounts of consent language, explicit opt-in design, and reduced or narrowed targeting choices.	Mentions of wording, opt-in design, or permitted targeting boundaries.	Generic references to consent with no design or scope decision.	Theme 2
First party priority	Preference for first-party or declared data over third-party or inferred individual-level data.	Explicit prioritisation of first-party, declared, or high-level company data.	General database references without data-source choice.	Theme 2
Small team and time scarcity	Statements about limited staff, time pressure, or lack of specialist legal/technical support.	Mentions of being a small team, overstretched capacity, or lack of expertise.	General complaints not tied to resource limits.	Theme 3
Long cycle and attribution barrier	Difficulty linking compliant personalisation to outcomes because of long B2B cycles, delayed attribution, or fragmented journeys.	Mentions of long buying cycles, attribution gaps, or delayed evidence.	General measurement comments with no barrier explanation.	Theme 3
Selective enforcement tradeoff	Accounts of prioritising some journeys, channels, or risks over others because full coverage was not feasible.	Mentions of triage, selective governance, or pragmatic compromise.	General governance description with no trade-off.	Theme 3
Platform defaults shape governance	Statements that consent, preferences, checks, or analytics are structured by CRM, CMP, or vendor defaults.	Mentions of built-in steps, standard forms, default fields, or workflow dependence.	Tool mentions without governance effect.	Theme 4
Vendor control limits	Limits on control caused by tool design, weak integrations, or vendor capability gaps.	Mentions of inability to customise, integration failures, or delayed fixes.	General tool references without stated limitation.	Theme 4
Aggregated reporting only	Use of aggregated numbers or standard system fields instead of fine-grained personal control or analysis.	Mentions of aggregated analytics, standard fields, or reduced granularity.	General reporting discussion without platform-related constraint.	Theme 4

3. Notes on code use

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- Codes were applied to support analytical salience and cross-case comparison, not statistical inference.
 - A single extract could carry more than one code where decision logic, constraint, and outcome were clearly linked.
 - The final four chapter themes were built by consolidating related code clusters and then testing alternative interpretations.

Appendix I: Theme development and audit trail

How can SMEs balance privacy and performance to achieve effective personalised marketing under GDPR

This appendix summarises the main analysis steps and interpretive decisions used to move from interview data to the final themes reported in Chapter 5. It is intended to support dependability and confirmability by showing how the findings were developed and bounded.

1. Analysis sequence

- Dataset: 11 interview transcripts from UK B2B SME marketing decision-makers.
- Cycle 1: open coding from participant language, examples, and operational accounts.
- Cycle 2: grouping open codes into candidate themes and linking them to RQ1-RQ4.
- Cycle 3: checking rival interpretations, low-frequency but high-risk research, and negative or deviant cases before finalising claims.

2. Key audit-log decisions

Entry	Date	Stage	Key decision	Why it mattered
A01	2026-02-03	Data familiarisation	Kept interpretation at decision-logic level only rather than treating comments as legal judgements.	Avoid overstating claims beyond managerial evidence.
A02	2026-02-08	Data familiarisation	Flagged early patterns as provisional until more sectors were included.	Prevented single-sector overgeneralisation.
A03	2026-03-08	Cycle 1 open coding	Completed open coding before theoretical grouping.	Preserved openness to participant language before theme consolidation.
A04	2026-03-08	Prevalence check	Retained low-frequency but high-risk incidents in memo notes.	Avoided losing analytically important exceptions.
A05	2026-03-08	Cycle 2 grouping	Separated resource constraint from regulatory filtering when the underlying logic was different.	Improved thematic clarity between external rule pressure and internal capacity pressure.
A06	2026-03-08	Negative-case check	Framed outcomes as contingent rather than uniformly positive or negative.	Bounded the findings and reduced overclaiming.
A07	2026-03-08	Conceptual mapping	Marked where research extended theory rather than directly confirmed it.	Helped keep the literature comparison proportionate.
A08	2026-03-08	Platform-governance check	Interpreted platform dependence as infrastructural mediation when respondents linked compliance routines to default system workflows.	Supported the final governance-platform theme.
A09	2026-03-08	RQ linkage validation	Added explicit research-question linkage statements to each final theme.	Improved traceability from findings to conclusions.
A10	2026-03-09	Reflexive consolidation	Recorded alternative interpretations considered at each stage.	Supports confirmability and reflexive transparency.

3. Theme consolidation path

The broader open-code patterns were consolidated into the final dissertation themes as follows:

- Codes on performance metrics, complaints, opt-outs, audit confidence, and continuation logic were consolidated into Theme 1: Performance as managerial judgement.
- Codes on narrowed targeting, explicit opt-in, first-party data, and pre-campaign rule filtering were consolidated into Theme 2: Regulatory constraint as a strategic filter.
- Codes on small teams, long sales cycles, attribution difficulty, and selective governance were consolidated into Theme 3: Limited resources and practical trade-offs.
- Codes on CRM defaults, vendor workflows, limited custom control, and aggregated standard reporting were consolidated into Theme 4: Governance is controlled by the software platform.

4. Rival interpretations and negative-case checks

- Some positive outcomes could also be explained by better content quality or tighter audience relevance rather than by compliance routines alone. This interpretation was retained as a caution in the discussion.
- Resource constraints did not look identical in every case. In some interviews the pressure point was integration complexity or multi-tool coordination rather than pure budget scarcity.
- Not all participants fully rejected enrichment. At least one account described company-level enrichment while still rejecting individual-level third-party profiling. This prevented the findings from being framed as absolute rejection of all enrichment.
- Not all retargeting disappeared entirely. Some respondents described narrower or higher-intent windows rather than total removal, which prevented an over-broad conclusion.

5. Bounded claims used in the dissertation

The findings are presented as self-reported managerial accounts of decision logic, operational practice, and evaluation criteria. They are not treated as audited proof of legal compliance or causal proof of marketing effect. This boundary was kept throughout the analysis and later shaped how the discussion and conclusion were written.

Appendix J: Sample coded extracts

How can SMEs balance privacy and performance to achieve effective personalised marketing under GDPR

This appendix provides a concise set of anonymised interview extracts used to illustrate how the final themes were grounded in participant accounts. Participant codes match the anonymised sample summary in Appendix F. Extracts are short verbatim excerpts with identifying detail removed where necessary.

1. Extract table

Participant code	Short verbatim extract	Initial working code /	Final theme	Linked research question	Why this extract was selected
P04	If it pipes into sales wins without backlash, that's the real judge proving ROI in our niche.	Mixed performance logic	Theme 1: Performance as managerial judgement	RQ4	Shows that performance was judged through both commercial return and absence of trust or compliance backlash.
P03	A clean external audit, year on year. No significant incidents for a couple of years.	Continuation thresholds	Theme 1: Performance as managerial judgement	RQ4	Captures the continuation logic used to judge whether a practice remained sustainable over time.
P01	Consent became real - people had to actively tick a box saying they wanted to hear from us.	Consent formalisation	Theme 2: Regulatory constraint as a strategic filter	RQ1	Shows GDPR being described as a front-end change in what could count as acceptable outreach.
P01	Forms are completely different now. No pre-ticked boxes. Clear language about what they're signing up for.	Explicit consent redesign	Theme 2: Regulatory constraint as a strategic filter	RQ1/RQ3	Illustrates how regulatory pressure translated into concrete design choices before campaigns went live.
P03	I'm a team of two. Adding proper GDPR compliance... it's a lot. There aren't enough hours.	Small team constraint	Theme 3: Limited resources and practical trade-offs	RQ2	Shows how resource pressure shaped what could realistically be implemented.
P04	Long decision cycles... testing compliant personalisation takes ages to show results.	Long cycle measurement barrier	Theme 3: Limited resources and practical trade-offs	RQ2	Captures the B2B time-lag problem that made compliant experimentation and attribution difficult.
P07	Campaigns have a checklist... It's in Trello, takes five minutes. Prevents so many problems."	Workflow embedded governance	Theme 4: Platform-mediated governance	RQ3	Shows governance being implemented through routine platform or workflow tools rather than bespoke systems.
P03	We had a legacy integration... anyone who'd ever clicked on a LinkedIn ad... were getting added to our database.	Integration risk	Theme 4: Platform-mediated governance	RQ2/RQ3	Illustrates how software integrations could shape compliance risk independently of formal policy intent.

2. Use of the extracts in the dissertation

- The extracts were selected because they map directly to the final four dissertation themes reported in Chapter 5.

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- The appendix is intended only to provide examples and should not be treated as a complete list or used to make statistical claims about how often certain patterns occurred.
 - All participant names and organisation names have been removed from this appendix to preserve the anonymised reporting.

Appendix K: Extended chapter 5 analysis figures and tables

How can SMEs balance privacy and performance to achieve effective personalised marketing under GDPR

This appendix provides a record of the Chapter 5 analysis process, the recurring pattern summary used for interpretation, and the supporting figure and table assets prepared for the findings chapter.

1. Analysis process summary

Stage	What was done
1. Familiarisation	Read and reviewed all interview transcripts and logged recurring language, constraints, and decision rules.
2. Open coding (Cycle 1)	Applied initial codes directly from participant accounts before theoretical grouping.
3. Pattern consolidation (Cycle 2)	Clustered recurrent codes into candidate themes and checked cross-case consistency.
4. Rival interpretation and negative-case checks (Cycle 3)	Tested alternative explanations and retained bounded claims where the evidence did not support uniform conclusions.

2. Pattern-frequency summary used for Chapter 5 interpretation

Pattern	Participants (n)	Coverage (%)	Analytical implication
Explicit consent routines	11	100.0	Consent was treated as a strategic filter at the start of campaign design.
Tracking reduction and aggregation	11	100.0	Participants described reduced behavioural granularity and greater reliance on aggregated or first-party signals.
Resource and capability constraints	11	100.0	Small teams and limited specialist capacity shaped implementation depth and prioritisation.
Platform-mediated governance	11	100.0	Governance practice was often executed through CRM, analytics, and consent-platform defaults.
Educational low-data strategy	10	90.9	Many respondents compensated for lower data volume with relevance and trust-building content.
Quality-over-quantity framing	5	45.5	Only a subset explicitly framed success in these terms, which signals strategic variation rather than a universal rule.

These pattern counts were used for analytic emphasis only. Because the study is qualitative, they are not presented as causal effect estimates or as claims of statistical prevalence beyond the sample.

3. Extended figure and table asset list

Asset File name	Purpose	Figure
5.1 - Thematic analysis process.png	Shows the movement from transcript familiarisation to coding, theme development, and final reporting.	5.1 Figure
Figure 5.2 - Codebook to research theme map.png	Shows how working codes were consolidated into the four final dissertation themes.	Figure 5.2
Figure 5.3 - Participant Theme Heatmap.png/.svg	Provides a visual overview of how the final themes appeared across the anonymised participant set.	Figure 5.3
Figure 5.4 - Theme 1 Code Frequency.png	Summarises the internal code structure used to interpret Theme 1.	Figure 5.4
Figure 5.5 - Theme Cooccurrence Matrix Network.png	Shows co-occurrence relationships across the final analytical structure.	Figure 5.5
Figure 5.6 - Research Chain Sankey.png	Illustrates how raw evidence, code clusters, and final themes were linked. It also links the four final themes back to the research questions addressed in the dissertation.	Figure 5.6

Appendix L: Data Management, Privacy Notice, and Anonymisation Procedure

How can SMEs balance privacy and performance to achieve effective personalised marketing under GDPR

This appendix provides the study-specific privacy and data handling summary for the dissertation interviews.

1. Study-specific privacy notice

The University of Glasgow acts as the data controller for personal data processed in relation to participation in the research project "How can SMEs balance privacy and performance to achieve effective personalised marketing under GDPR". The project forms part of the MSc Marketing dissertation research process. The student researcher is Alvin Kibalama (2669162K@student.gla.ac.uk) and the dissertation supervisor is Francesca Dall'Olmo Riley (Francesca.Riley@glasgow.ac.uk).

The study involves online semi-structured interviews with marketing decision-makers at B2B SMEs in the UK. Personal data are processed only to organise participation, conduct the interview, and complete the dissertation research process.

2. Data collected

- Basic contact details needed to arrange the interview, such as name, professional email address, and calendar availability.
- Professional role information relevant to eligibility screening, such as job title, organisation type, and sector context.
- Signed consent information confirming voluntary participation and audio-recording permission.
- Interview audio recordings and transcripts generated for research analysis.
- Anonymised analytical materials, including coded extracts, theme-development notes, and audit-trail records.

The study does not intentionally seek special category personal data. If such information is disclosed incidentally during an interview, it will be treated confidentially and handled within the same secure research controls.

3. Legal basis / ethics position

The basic personal data used to organise and conduct the research are processed on the basis that the research is carried out in the public interest as part of academic study. In addition, consent is used to meet the ethical requirements of voluntary participation, interview recording, and the use of anonymised quotations in the dissertation.

The study follows the Adam Smith Business School dissertation ethics process and uses participant documentation based on the University of Glasgow MSc Marketing templates. Ethical approval and governance context are summarised in Appendix A.

4. Storage and access controls

- Research files are stored in secure University-approved locations, including encrypted storage and University OneDrive where appropriate.

- Access to identifiable data is restricted to the researcher and, where necessary for academic oversight, the dissertation supervisor.
- Devices used to access the data are password-protected and encrypted.
- Identifying information is kept separate from analytical materials as far as possible.
- No raw interview data are intended for public release.

5. Anonymisation procedure

- Each participant is assigned a participant code for reporting and appendix use.
- Names, organisation names, and direct identifiers are removed from reporting tables and coded-extract appendices where possible.
- Distinctive contextual details are reduced where necessary to lower the risk of indirect identification.
- A separate linking record between identities and participant codes is kept securely and is not reproduced in the dissertation.

Complete anonymity cannot be guaranteed in every context, particularly where participants hold distinctive senior roles in narrow sectors. The study therefore applies reasonable steps to minimise identification risk rather than claiming absolute anonymity.

6. Retention and deletion

Personal identifying data will be retained only for as long as necessary to complete the dissertation process and no longer than the exam board period that confirms the award outcome for the MSc Marketing programme. After that point, identifiable personal data will be securely deleted.

Research data needed to evidence the dissertation, including anonymised transcripts, coded materials, and analytical notes, may be retained for up to 10 years in line with University of Glasgow guidance on research data retention. Audio recordings will be retained only as long as necessary for transcription, checking, and assessment-related verification before secure deletion.

Participants may withdraw within 14 days after the interview, provided anonymisation and coding have not already been completed. This withdrawal position matches the wording used in Appendices B and C.

7. Participant rights and complaints route

Participants may request access to the personal data processed about them and may in some cases request rectification, restriction, or erasure, subject to the research exemptions that can apply under data protection law. Requests can be directed through the University data protection route or by contacting dp@gla.ac.uk. If a participant wishes to raise a concern about how personal data have been handled, they may contact the University Data Protection Officer at dataprotectionofficer@glasgow.ac.uk. If they remain dissatisfied, they may complain to the Information Commissioner's Office (ICO).

For study-specific questions, participants may contact Alvin Kibalama (2669162K@student.gla.ac.uk) or Francesca Dall'Olmo Riley (Francesca.Riley@glasgow.ac.uk).

Appendix M: Thematic analysis procedure

The analysis followed three cycles, each with defined coding criteria. In Cycle 1, open coding was applied line by line to each transcript. A meaningful segment was defined as any passage in which a participant described a decision, constraint, trade-off, or judgement relating to GDPR compliance or personalisation practice. Initial labels were drawn from participants' own language rather than theoretical categories, to keep the coding grounded in reported experience rather than imposed from the framework. Codes were defined inclusively at this stage: where a passage could plausibly attract more than one label, both were recorded and the ambiguity noted for review.

In Cycle 2, codes with overlapping definitions or shared empirical referents were merged, and the resulting candidate themes were tested for internal coherence and external distinctiveness. A theme was treated as coherent when all codes within it shared a common analytical logic not simply a common topic and as distinct when it addressed a different dimension of the privacy-performance challenge from the other themes. Where a code appeared relevant to more than one theme, it was assigned to the theme it most directly supported and flagged as a secondary contributor elsewhere.

In Cycle 3, rival interpretations were actively considered for each theme. This involved returning to the full transcript set and asking whether the theme held across all eleven cases, whether any participant accounts contradicted it, and whether an alternative interpretation of the same data was plausible. Disconfirming cases were not excluded. Where a participant's account diverged from the dominant pattern, this was noted in the theme write-up and used to qualify the scope of the analytical claim. Final theme labels and definitions were fixed only after this review, and the links between themes and RQ1–RQ4 were established on the basis of which analytical question each theme most directly addressed. The working codebook, theme development audit trail, and sample coded extracts are provided in Appendices H, I, and J respectively.