

Meeting: TCF Governance Board, Q4

Date and Time: Tuesday 21 November 2023 at 15:00 (CET)

Venue: Virtual

Present: Christer Ljones (Schibsted Marketing Services) (Chair)

Colin O'Malley (Integral Ad Sciences)	Ben Humphry (Huawei)
Karsten Rieke (Criteo)	Benoit Oberle (Sirdata)
Romain Gauthier (Didomi)	Jochem Schlosser (Adform)
Jaakko Kuivalainen (Sanoma)	Markus Rhul (Publicis Groupe)
Arne Steinmetz (RTL Group/AdAlliance)	Robert Blanck (Axel Springer)
Jean-Marc Vidal (TF1)	

Apologies:

Ben Barokas (Sourcepoint)
Gareth Burkhill-Howarth (WPP)
Thomas Peruzzi (Virtual Minds)

Board Observer:

Leigh Freund (NAI)
Conor Murray (egta)
Magdalena Bublewicz (IAB Poland)
Christie Dennehy-Neil (IAB UK)

In attendance:

Townsend Feehan (CEO, IAB Europe, Managing Organisation)
Ninon Vagner (Director Privacy & Compliance, IAB Europe, Managing Organisation)
Rowena Lam (Senior Director Privacy & Data, IAB Tech Lab)

Anne Goodman – Secretariat (IAB Europe)

Chair

The meeting was declared quorate.
The Chair opened the meeting welcoming all and noting the full agenda.

Action Items Q3 meeting (status)

There were 3 action items recorded at the Q3 Board meeting against which the Secretariat provide an update during today's meeting.

Action: *The MO agreed to review the risks highlighted in the Risk Registry beyond those currently listed and update with those proposed by the Board at the Q3 meeting, taking account of the Boards discussion of the broader market context that might impact the TCF.*

Action taken: This item was outstanding and Secretariat advised that it would be updated before the Q1 Board meeting in 2024 for review

Action: *Secretariat to advise the IAB Europe Board Chair & VC of the amendments to the TCF Governance Vademecum reflecting the Board agreed amendments relating to observer attendance and term sync with Board members and prepare for presentation to the full Board.*

Action taken: TCF Governance Board Chair will present the updates at the IAB Europe Q4 meeting November 28

Action: *MO to provide a GVL analysis for 2023 at the Q4 Board*

Action taken: See agenda item (8) for update

Steering Group (SG) update (PAPER 2_14-11-23) for noting – The Vice Chair of the SG Benoit Oberle presented the update from the SG and its working groups (WGs) on recent TCF developments that the SG oversaw. The update circulated to the Board prior to the meeting, in line with previous reports, focused on the significant work of the TCF working groups that were supporting the implementation of TCF v2.2: principally the Policy Working Group calling out the work on “dark patterns” as an important discussion; and the Framework Signals Working Group (FSWG) review of technical updates highlighted during implementation.

There were no questions from the Board.

Managing Organisation (MO) update (PAPER 3_14-11-23) for noting –The CEO of the Managing Organisation, Townsend Feehan, presented highlights from the update. The update had been circulated to the Board prior to the meeting. The MO highlighted that the day before the Board meeting, November 20, was the day by which Vendors and CMPs were required to implement the new policies and specifications for TCF v2.2. TC Strings created after this date under TCF v2.1 will be considered invalid, and the GVL for TCF v2.1 will be deprecated - archives will remain available for decoding purposes.

Following the update, the Board raised the following questions:

- update on the completion of the ‘vendor compliance questionnaire’, MO advised that checks were in progress and a number of vendors had been asked to provide more detail to ensure that their questionnaire was complete;
- CMP TCF v2.2 validation – MO advised that auditing of CMPs had commenced as from the November 20th deadline

Tech Lab update – Rowena Lam (Senior Director Privacy & Data, IAB Tech Lab) provided a comprehensive update on the following Tech Lab workstreams that are supporting the TCF:

Encoder/Decoder tool – the legacy TCF encoder/decoder would no longer be supported in favour of the GPP encoder/decoder that was in testing and feedback following incorporation of the TCF v2.2 updates;

Accountability Platform – this platform will support the auditing of the consent signal to ensure that it is passed intact and without alteration; it was noted that it would not solve for all instances that a signed consent string could potentially solve and signed consent strings are still in the product backlog for consideration; the spec will be passed into public comment in December; the Tech Lab noted that longer term there are likely to be multiple entities involved in the management of the platform;

Data Deletion Framework – highlighted that 1st party data deletion of their own data is out of scope since the purpose of this spec is to facilitate the communication of deletion requests from first parties to their partners and for that request to be propagated (if necessary) to additional partners downstream, the public comment for the spec ended on December 2;

Update on DSA – presented by Townsend Feehan (CEO, IAB Europe, Managing Organisation). The draft DSA Tech Spec has been formally handed over to the Tech Lab to finalise and make available for public comment in December. IAB Europe asked the Board to note that the spec, in this first stage, is an MVP and was developed to ensure that online platforms were supported to meet the regulation deadline of February 10, 2024. The short timescales were acknowledged. Prior to this the MO noted the Tech Spec has been shared with EDAA (Steering Group and ‘bespoke’ working group) who have subsequently announced to the market that EDAA will enlist the Tech Lab/IAB Europe spec in its “AATP” DSA ads transparency programme

The Board discussion, following the update, highlighted the following points:

- importance of implementation guidelines to support the spec, MO confirmed that these were currently being drafted, and would be shared with the DSA Taskforce before being finalised;
- tight timescales were noted and the MO reiterated that the Board should note that this was an MVP release that gave scope for “fast follow through” of updates;
- role of CMP and opportunity to leverage the TCF as the locus of user choice about the “main parameters” used to determine why a user received a given ad were noted;
- the Board highlighted the complexity of the topic specifically reference the disclosure requirements in article 26 and regulation associated with this; the MO advised that each EU Member State would designate a “Digital Services Coordinator (DSC) act as DSA regulator);
- the MO advised that early interactions with at least a few DSCs (e.g., France, Ireland) had suggested that they were receptive to the approach proposed by IAB Europe

Deprecation of the TCF API in favour of the GPP API – the Board was asked to discuss this important proposal and had in advance received a document of a draft FAQ prepared by Tech Lab, to help inform the discussion.

- in the first instance the Board reiterated that it was important that market was supportive of GPP but also highlighted that to date there was limited evidence of signal handling in GPP therefore difficult to judge the scope of GPP implementation;
- overall, the Board appreciated the simplification of having one API for all signals and the value this could bring in the long term;
- key concern raised was the technical implementations and therefore the impact on timing to ensure a successful adoption and minimisation of “tech debt”; in addition the Board suggested that account should be taken of the recent implementation of TCF v2.2 and the impact on the market resources to successfully manage this, therefore careful planning was crucial and the timing of the rollout needed to take full account of everything else that was in the pipeline for delivery by the market;
- the Board sought a clarification of the specific decision-making process that would need to be followed to enable a date to be set for transition to GPP; the MO confirmed that the TCF instances, Policy WG, FSWG and Steering Group, were the key decision-making bodies, with the FSWG in the first instance discussing the technical implications; with reference to technical implementation, the Tech Lab acknowledged that testing would most likely be a lengthy process;
- the Board highlighted that effective and timely communication to the market would be crucial to ensuring that all stakeholders had a good level of understanding;
- finally, the Board highlighted that going forwards it was important that the any additional signals developed for other markets should be integrated in GPP.

Action: Board members from Adform and Criteo agreed to share information on GPP adoption as a starting point for the Board being able to assess market readiness.

TCF 2023 GVL review of registrations – the MO gave an update on the annual analysis of the TCF registration completed in this instance for 2023. The details will be circulated to the Board as a GVL TCF 2023 report but in summary key points included:

- stability in numbers with small YoY growth and sound representation across the ecosystem from small national to large global players;
- there was a small decrease in markets covered from 47 to 43 as some vendors updated their registration principally to change their country of registration (*MO – the vendor registration in relation to market can be inconsistent so any changes to markets represented should be treated with caution*)
- TCF coverage of the ad value chain was comprehensive and good match to industry activity with a slight leaning towards ad serving, there was an increase in campaign analytic services and decrease in header bidding services;

AOB

There was one other business item proposed by the Board covering the accommodation of 1st party data providers in the TCF and the MO support for scoping out the market support for this accommodation. Important to understand the requirement from the demand side with better understanding of vendor registrations linked to publisher and those linked to advertisers.

Action – MO to include in 2024 MO planning, a scoping of additional functionality to include other use cases such as retail media into the TCF, to better accommodate advertisers and first-party data providers.

Close

The Chair thanked the board members for their invaluable contributions to the discussion in the meeting.

It was agreed that the next meeting (Q1) would take place in person early in March 2023 respecting that alternative Board meetings are face-to-face.

The meeting closed at 17:00 CET