

Dated: 19 August 2025

Subject: Additional clarifications on TCF 2.3 transition period and release of the TCF JS library update

Dear TCF Participants,

This notification is to inform you that the <u>TCF Type Script Library iabtcf-es</u> maintained by IAB Tech Lab has been updated to align with the TCF Technical Specifications 2.3 (see previous notification here).

Following questions from the community, you will also find below additional clarifications on the TCF 2.3 transition period that will run until 28 February 2026.

• No resurfacing requirement for CMPs

CMPs should not be required to re-surface the UI to accommodate this change.

- TC Strings created before 28 February 2026 without a disclosedVendors segment remain valid after 28 February 2026.
- TC Strings created after 28 February 2026 without this segment will be considered invalid.

CMPs that already made use of the previously optional disclosedVendors segment or kept record of which Vendors were disclosed at the time TC Strings were initially created may update existing TC Strings by including it directly after the Core segment (please note that the lastUpdated field should not be changed in such a case). However, CMPs that did not keep a record of which Vendors were disclosed at the time the TC String was initially created should wait for users to renew and/or change the choices they previously made to create a TC String that includes the disclosedVendors segment.

For avoidance of doubt any vendor surfaced by the CMP must be included in the disclosedVendor segment when this segment is present in the TC String.

TC String handling by Vendors

Vendors affected by the signalling ambiguity may already support the disclosedVendors segment as soon as they begin receiving TC Strings that include it. Post 28 February 2026, all Vendors must recognize and act on the disclosedVendors segment appropriately.

This includes Vendors with only a legal basis for Special Purposes that shall rely on the disclosedVendors segment to determine if the CMP has established transparency on their behalf instead of relying on the LI bit for their Vendor IDs in the Vendor Legitimate Interest Section.

<u>Legitimate Interest Bit in TC String</u>

CMPs must continue to set the Legitimate Interest bit to 1 for vendors registered for Special Purposes only and have been disclosed on the CMP, as required by TCF Specifications. This is



to accommodate Vendors who do not support TCF 2.3 prior to the enforcement date of 28 February 2026.

• TCF Policy Version

The tcfPolicyVersion will remain version 5 for TCF 2.3 since this is solely a change of the Technical Specifications. The inclusion of the disclosedVendor segment should be used to determine whether the TC String was created under 2.3.

If you have any questions, please don't hesitate to contact framework@iabeurope.eu.

Kind regards,

IAB Europe Team



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