

Transparency and Consent Framework v2.0 FAQs

Question	Answer
<p>What is the IAB Europe Transparency & Consent Framework (TCF)?</p>	<p>The Transparency and Consent Framework (TCF) consists of technical Specifications and Policies for the digital sector that assist companies that participate in or rely on the use of cookies or other tracking technologies, the creation of or use of profiles for personalised advertising and content, ad or content measurement, using panel-based audience insights, improving their products and services or developing new ones, preventing fraud and maintaining security, and delivering ads or content over the internet, to meet transparency and user choice requirements found in EU privacy and data protection laws such as the European General Data Protection Regulation (GDPR) and the ePrivacy Directive (ePD).</p> <p>It has been developed by IAB Europe in collaboration with organisations and professionals in the digital advertising and publishing industries.</p> <p>The TCF consists of:</p> <ul style="list-style-type: none"> ● A registry of vendors called the Global Vendor List (GVL), which digital property operators, such as publishers, can use to see whether the vendors they work with participate in the TCF, the purposes for which they process personal data, and the legal bases on which they do so, as well as any features they use, as well as a link to their privacy policy ● A list of consent management providers (CMPs) that can work with digital property operators ● Policies and terms & conditions underlying: <ul style="list-style-type: none"> ○ Vendor registration on the GVL ○ The disclosures to be made about vendors included on the GVL ○ Use of the technical standards by publishers and vendors on the GVL ○ Responding to technical signals received ○ How to handle user data ● Technical standards covering: <ul style="list-style-type: none"> ○ Retrieval of information from the GVL about the vendors it works with to disclose that information to a publisher's users ○ Capturing, storing and retrieving a user's choice about each vendor and purpose

	<ul style="list-style-type: none"> ○ Dissemination of that information through the advertising ecosystem so that vendors know whether they have the appropriate permission and legal basis to process a user’s personal information
<p>Why was the TCF created?</p>	<p>The TCF was created to help companies that serve, measure and manage digital and personalised advertising content comply with the European General Data Protection Regulation (GDPR) and ePrivacy Directive (ePD) when processing personal data or accessing and/or storing information on a user’s device.</p> <p>The user is therefore the principal focus of the TCF, designed to give them both transparency over the use of their data and control over how their data could be used depending on the choices they make. In each instance of the development of the TCF the user remains central to its objective.</p> <p>The TCF was launched on 25 April 2018 and is the only digital advertising industry transparency and user choice framework built in response to GDPR as a cross-industry initiative.</p>
<p>Who is the TCF designed for?</p>	<p>The TCF is designed to help digital property operators, such as publishers and advertisers, work with technology vendors that provide data-driven services which support both their operations and commercial activities. It supports a diverse array of companies in the digital advertising supply chain in their compliance with data protection laws when accessing and/or storing information on a user’s device or processing personal data.</p> <p>Central to the design of the framework is the opportunity it gives digital property operators to communicate to their users what data is being collected, how a digital property and its vendors intend to use it, and which vendors intend to use it and how users can exercise complete control over this processing.</p> <p>Delivering the transparency and user choice requirements found in data protection laws of the European General Data Protection Regulation (GDPR) and the ePrivacy Directive (ePD) is core to the operation of a digital property. The TCF was designed to support the digital advertising sector meet both the needs of the consumer at the same time as providing a commercially sustainable future for suppliers of the digital services that users wish to access.</p>
<p>Who manages the</p>	<p>The Managing Organisation (MO) is IAB Europe. IAB Europe works closely with IAB</p>

<p>TCF?</p>	<p>Tech Lab to collaborate in the management of participating companies, experts and working groups that create the common policy and technology specification that underpin the TCF. Within its role of MO, IAB Europe takes specific responsibility for TCF Policies, compliance, and management of the Global Vendor List (GVL) and CMP administration. IAB Tech Lab is responsible for developing and iterating on the technical specifications associated with the TCF.</p> <p>IAB Europe, IAB Tech Lab and industry partners have remained passionate about making a sustainable framework that truly delivers user transparency, choice and control. Without the standardisation and common methods provided by the TCF, such as common definitions of the industry’s personal data processing operations and purposes and technical mechanisms to offer and give effect to user choice and control, compliance with EU privacy and data protection law would at best be more confusing and expensive, and at worst, impossible.</p>
<p>Why did you create an updated version of the TCF, TCF v2.0?</p>	<p>Successful management of technical frameworks over time requires continual consultation with its users and the broad base of stakeholders. For the TCF, that includes publishers, advertisers, media agencies, technology providers, and data protection authorities. Over the past 12 months, stakeholder feedback has been sought, most notably from the publisher community and regulators providing valuable feedback on how the framework can be improved and better serve the community. This has driven the creation and purpose of TCF v2.0. In addition, feedback from regulators on TCF was sought and incorporated.</p> <p>The vision for TCF v2.0 is to provide enhanced transparency and choice to consumers and greater control to publishers.</p>
<p>Who contributed to developing the second iteration of the TCF, TCF v2.0?</p>	<p>Much like TCF, TCF v2.0 was developed with an emphasis on creating an industry standard through the inclusive, fair and consensus-based participation of stakeholders. The community of TCF stakeholders is broad and includes publishers, technology providers and advertising and media agencies. IAB Europe as the Managing Organisation (MO) of the TCF established a TCF Steering Group (SG) whose mission is to bring together these stakeholders to actively contribute to iterating on all non-technical aspects of the TCF and engage with the IAB Tech Lab, which owns iterating on the technical specifications.</p> <p>Substantive scope of the SG includes definition of policy requirements, identification of new features and functionality to align to regulatory and policy requirements,</p>

	<p>validation of vendors and CMPs, and dialogue with European data protection enforcement authorities. The SG convenes working groups as necessary to propose solutions to problems identified by the SG and is the “plenary” to whom working groups report. The Tech Lab has an established GDPR Working Group that is responsible for the technical iterations that are managed by the Tech Lab Commit Group.</p>
<p>Who was involved with creating the updated Policies for TCF v2.0?</p>	<p>IAB Europe’s TCF Steering Group (SG) was responsible for creating the updated policy requirements. The SG consists of IAB Europe membership and actively encourages participation from all companies in the digital advertising supply chain, including publishers and digital property operators, technology providers and advertising and media agencies and industry associations representing them. It has various working groups that report to it, including the Policies Working group, which is responsible for the Policies, and the Purposes Working Group that redefined the purposes and features of processing personal data that the TCF supports.</p>
<p>Who was involved with creating the Technical Specification for TCF v2.0?</p>	<p>The IAB Tech Lab’s GDPR Technical Working group was responsible for creating the updated technical specification for TCF v2.0. The working group involves companies that are actively engaged in all aspects of the digital advertising supply chain from digital property operators and app developers to tech vendors and media buyers. More broadly the IAB Tech Lab GDPR Technical Working group is tasked with iterating on the technical specifications associated with the TCF, managing and maintaining the TCF reference architecture, protocols, and specifications and providing technological solutions to new challenges presented as a result of new policy requirements resulting from TCF Policies updates. The governance of the IAB Tech Lab GDPR Technical Working Group is overseen by the IAB Tech Lab Commit Group.</p>
<p>What are the benefits of the TCF v2.0?</p>	<p>TCF v2.0 has been developed to provide both users and operators of digital properties such as publishers and advertisers with greater transparency and control.</p> <p>Under TCF v2.0, not only can the user give or withhold consent, but they can also exercise their ‘right to object’ to data being processed on the basis of legitimate interests. It also enables greater transparency for the user, through more detailed and more easily understandable descriptions of the purposes of data processing.</p> <p>The publisher can also exercise increased control over the purposes for which a vendor can process data collected on their digital property enabling greater</p>

	<p>customisation of the vendor operation. Vendors can more flexibly choose legal bases, allowing them to support different publisher and local market preferences. These increased levels of transparency and control throughout the supply chain support a more streamlined and transparent user experience.</p> <p>TCF v2.0 continues to support the overall drive of the TCF to increase user transparency and choice, management by digital properties of consent and compliance and industry collaboration that centers on standardisation.</p> <p>Specifically, TCF v2.0 supports</p> <ul style="list-style-type: none"> • Transparency- through revised definitions and descriptions of data processing purposes that combine greater granularity (now increased from 5 to 10 purposes with the addition of 2 special purposes, and 2 features and 2 special features) that will enable users to make more informed choices regarding the processing of their personal data. • Choice - the introduction of signals that allow CMPs to offer users a streamlined means for users exercising the “right to object” to processing on the basis of a “legitimate interest”. • Accountability - with a more complete accommodation of the “legitimate interests” legal basis for data processing that allows vendors to receive a signal about whether their legitimate interests have been disclosed. • Control - with new, granular controls for publishers about the data processing purposes permitted by them on a per vendor basis. • Compliance - through greater support for the users of the framework in their application of the policies, terms and conditions and technical specifications with increased investment by IAB Europe in the resource to support compliance.
<p>What are the main differences between TCF and TCF v2.0?</p>	<p>TCF v2.0 provides the following above the current technical specification and policies provided by TCF:</p> <ul style="list-style-type: none"> • <u>Increased and more “user friendly” detail on purposes</u> – significant time has been spent tailoring the industry’s standardised processing purposes to make them even more granular and user friendly and to provide some standardised flexibility to publishers in how they wish to message these purposes to their users. There are now 10 purposes (as opposed to 5 in TCF v1.0) and 2 special purposes. TCF v2.0 also includes 2 features and 2 special features. • A more complete accommodation of the “legitimate interests’ legal basis for

	<p>processing personal data including signaling whether a vendor’s legitimate interest has been disclosed, and of a user’s “right to object” (RTO) within TCF v2.0 signals.</p> <ul style="list-style-type: none"> • Greater <u>publisher controls</u> – giving a publisher more granular control over the purposes for which personal data is processed by a vendor on a per vendor basis. V2.0 also allows a vendor to register as capable of operating on multiple legal bases for the same purpose and allows publishers to declare which legal bases they prefer in order to work with vendors for that purpose. This allows vendors to more easily operate in different markets where they and publishers may have different perspectives on the appropriate legal basis on which personal data may be processed.
<p>What are the benefits for publishers and advertisers?</p>	<p><u>Publishers can provide more transparency to their users</u> with the introduction of clearer and more detailed purposes and standardised flexibility in how those purposes are described to their users. Publishers benefit from their users being better informed about the vendors publishers are using to deliver advertising and targeted content and having greater control over how those vendors use their data.</p> <p><u>Publishers have greater control</u> in version 2.0 of the TCF. The ability of the publisher to specify custom requirements (“publisher restrictions”) has been introduced allowing the publisher to have greater control over how and who it works with. Publisher restrictions allow digital properties to granularly control vendors and their use of personal data and enable custom requirements, for example:</p> <ul style="list-style-type: none"> • Purposes - more granular control over the purposes for which personal data is processed by a vendor; • Legal basis - specify the legal basis upon which a publisher requires a vendor to operate if the vendor provides options to publishers.
<p>What are the benefits for vendors?</p>	<p>Vendors may utilise the TCF to better inform users of processing purposes and legal bases relied on for processing personal data. Vendors in the advertising ecosystem benefit from consumers being better informed and having more control over their data and vendors benefit from this and the ability for consumers, publishers and vendors to talk about and signal those controls in a standard manner throughout the advertising ecosystem. This allows vendors to be more accountable knowing what information was disclosed to users and what choices a user made based on that information before processing personal data and maintaining records about the same for compliance purposes.</p>

	<p><u>Support the broader interests of the industry</u> through the explicit signalling of whether transparency has been provided to users about processing of personal data under the legitimate interest legal basis, and whether the user has objected to such processing, in addition to signals showing whether the user has consented or not consented to processing.</p>
<p>What are the benefits for CMPs?</p>	<p><u>New standard ways to effectively meet publisher and advertiser needs</u></p>
<p>What are the benefits for consumers?</p>	<p><u>Consumers will see an increase in controls</u> in TCF v2.0 with the more comprehensive inclusion of the functionality within the TCF for a consumer to exercise and signal the “right to object” (RTO) to processing based on a legitimate interest legal basis and a new signal to allow parties in the advertising supply chain to receive standardised signals through the TCF (vs. outside the TCF) that the user has objected to such processing / exercised the RTO.</p> <p>In addition, the consumer can also control how vendors may use certain “features” (i.e., data types and aspects of processing whose use can be integral to processing for many purposes) with an opt-in mechanic for “Precise Geolocation” beyond operating system controls and “active device scanning”</p> <p><u>Broadening of transparency for the consumer</u> with more detailed and user-friendly definitions of the purposes under which the parties in the digital media ecosystem can process data increasing the number of purposes from 5 to 12 and including two special features - geo-precise location and active device scanning for identification.</p>
<p>I am a vendor already registered with the TCF. Which version of the TCF should I be using?</p>	<p>Vendors will need to develop and maintain the technical capacity to read both the TCF string created in TCF v2.0 and also the TCF “daisy-bit” until the TCF v1.0 is fully deprecated in April 2020. This will ensure that the vendor can continue to work with the maximum number of digital properties who are using the Framework and are using either TCF or the updated version TCF v2.0.</p> <p>NB: Digital properties will use either TCF or TCF V2.0, they will not operate both versions at the same time.</p>
<p>I am a vendor and I want to join the TCF. Should I wait</p>	<p>You will need to register as a vendor in TCF and then give the additional registration details required for TCF v2.0. In the case of TCF v2.0 IAB Europe will notify vendors already registered with TCF once TCF v2.0 is released and this additional registration</p>

<p>until TCF v2.0 is released?</p>	<p>can be completed - this will be post the incorporation of the feedback from the public comment.</p> <p>As all publishers are unlikely to utilize TCFv2.0 immediately after its release, they will require a certain amount of development time to update their CMP - there will be both TCF and TCF v2.0 strings operating in the ecosystem concurrently for a period of time. Therefore, to ensure that you can work with the maximum number of publishers it is advisable that you (vendor) can read both strings.</p>
<p>If I join both TCF and TCF v2.0, would I have to pay two registration fees?</p>	<p>The vendor annual registration fee covers your TCF participation in any version. It is therefore not necessary to pay two registration fees to use both TCF v1.0 and v2.0.</p>
<p>Who should register for the TCF v2.0?</p>	<p>Any vendor or Consent Management Provider (CMP) that wishes to participate in the TCF must register with the TCF to participate.</p> <p>Vendors who wish to participate in TCF v2.0 must <u>also complete the additional TCF registration required pages</u> for TCF v2.0.</p> <p>If you are a CMP and have already registered with the TCF then your registration will automatically qualify as registered for TCF v2.0 - <u>CMPs do not need to formally re-register or</u> make changes to their current registration. However, CMPs should beware that they will need to implement TCF v2.0 prior to the deprecation date of TCF v1.0 or their service will stop functioning.</p> <p>The additional registration pages required for TCF v2.0 capture vendor details with respect to the updated purposes, legal basis and features that have been introduced for TCF v2.0. As previously mentioned, IAB Europe will notify all vendors who are currently registered in the TCF when registration is open for TCF v2.0.</p>
<p>Does TCF v2.0 operate differently from TCF?</p>	<p>TCF v2.0 operates in exactly the same way as TCF. It uses a binary system of data storage - which is where data is converted into bits (binary digits that are either 0 or 1). This creates a string of bits, the TC String, which follows the same programming principal as the "daisy bit" in TCF. To aid the transmission through the internet of the binary storage (1s and 0s), they are converted into a compressed string of letters and numbers. All vendors and CMPs in the supply chain will need to decode the string to render the data that will inform what the user has/has not consented/objected to and what the publisher has/has not given permission to. The encoding is done using base64. There is no change in this mechanic from TCF to TCF v2.0</p>

<p>If TCF v2.0 does not operate differently, how does it differ from TCF?</p>	<p>Principally the TC String in TCF v2.0 is longer than the “daisy-bit”. This is because it contains much more information than was captured by the first version of the TCF - this is the core and substantive difference. The increase in data stored in the string equates to the greater granularity of detail that provides user transparency and choice, and those working in the advertising supply chain with increased transparency, whilst increasing the permissions and controls a publisher can exercise</p>
<p>Have Data Protection Authorities (DPAs) been involved in the development of TCF v2.0?</p>	<p>IAB Europe has actively sought discussion with a number of European data protection authorities the outcomes of which have helped shape the development of TCF v2.0</p>