THE TRANSPARENCY & CONSENT FRAMEWORK (TCF) V2.0

FULL OVERVIEW FOR CMPS & VENDORS

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WELCOME

AGENDA

Speakers:

- Stevan Randjelovic, Brand Safety Manager, Group M
- Thomas Adhumeau, Senior Associate General Counsel, Commercial & Privacy, Xandr
- Chris Paterson, Senior Software Engineer, Conversant Media

Presentation: TCF v2.0 for CMPs & Vendors (45 min)

- The TCF Evolution
- TCF v2.0 CMPs & Vendors' Focus
- TCF v2.0 Policies Overview
- TCF v2.0 Data Processing Purposes
- TCF v2.0 Technical specifications
- Registration to TCF v2.0

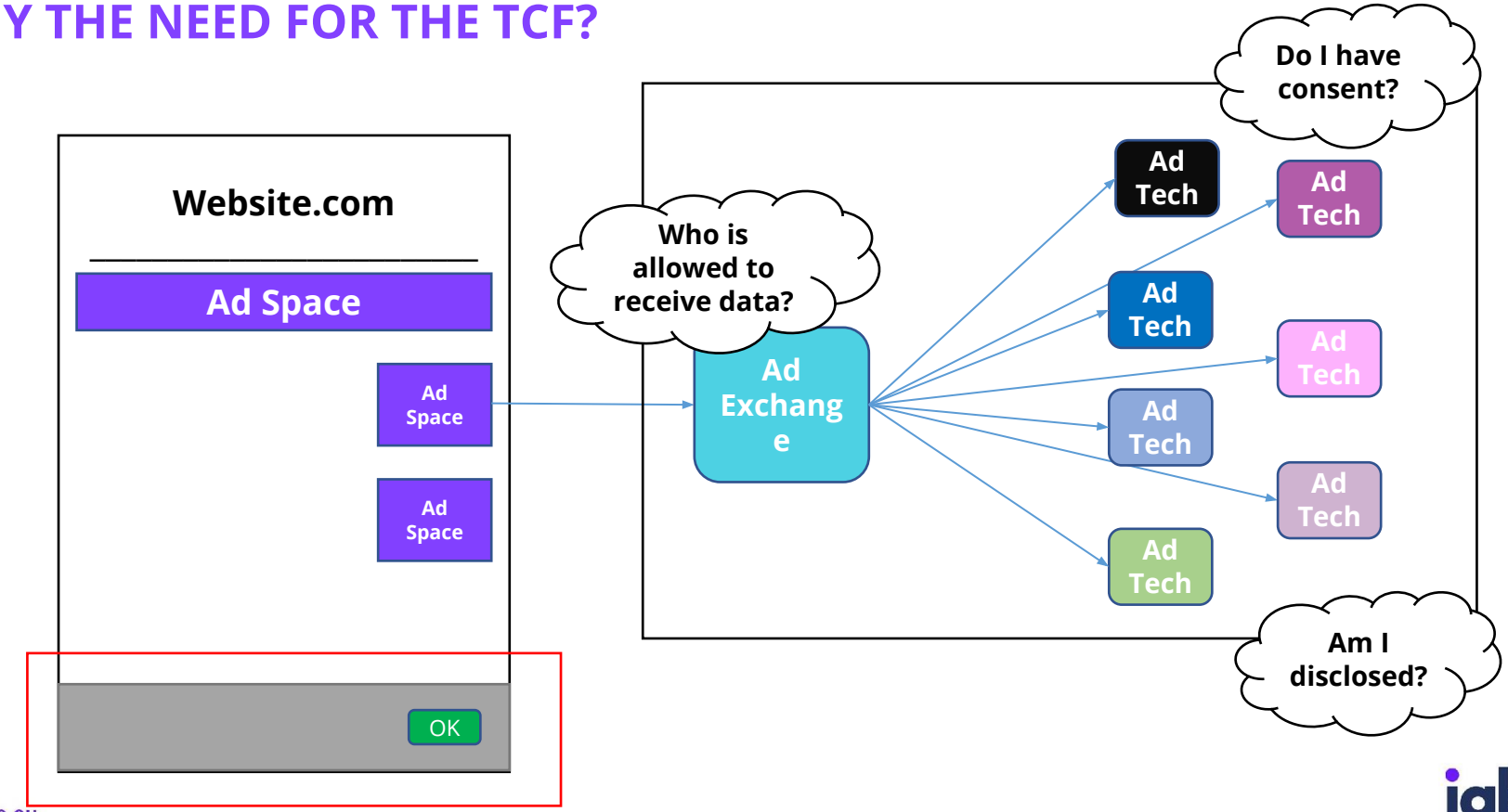
Q&A (45 min)

THE TCF EVOLUTION

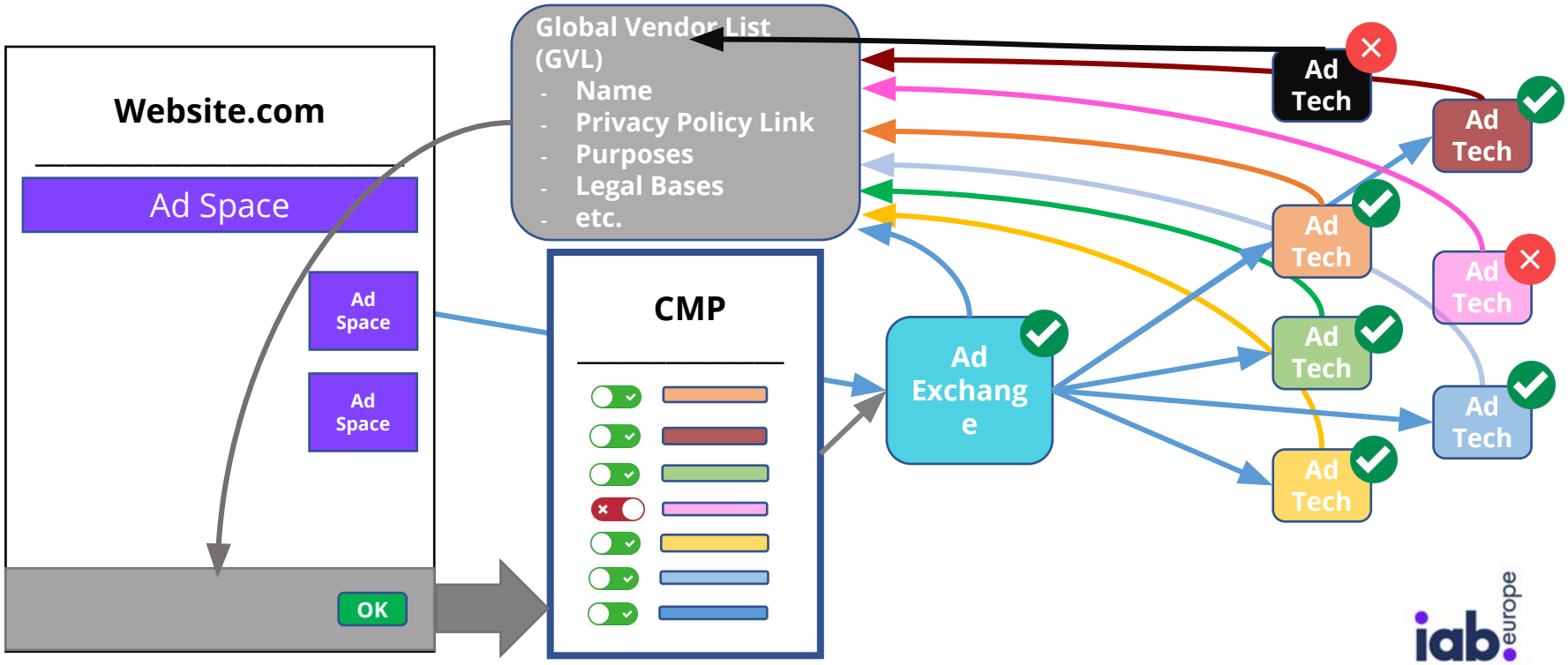
A SHORT HISTORY ON THE TCF

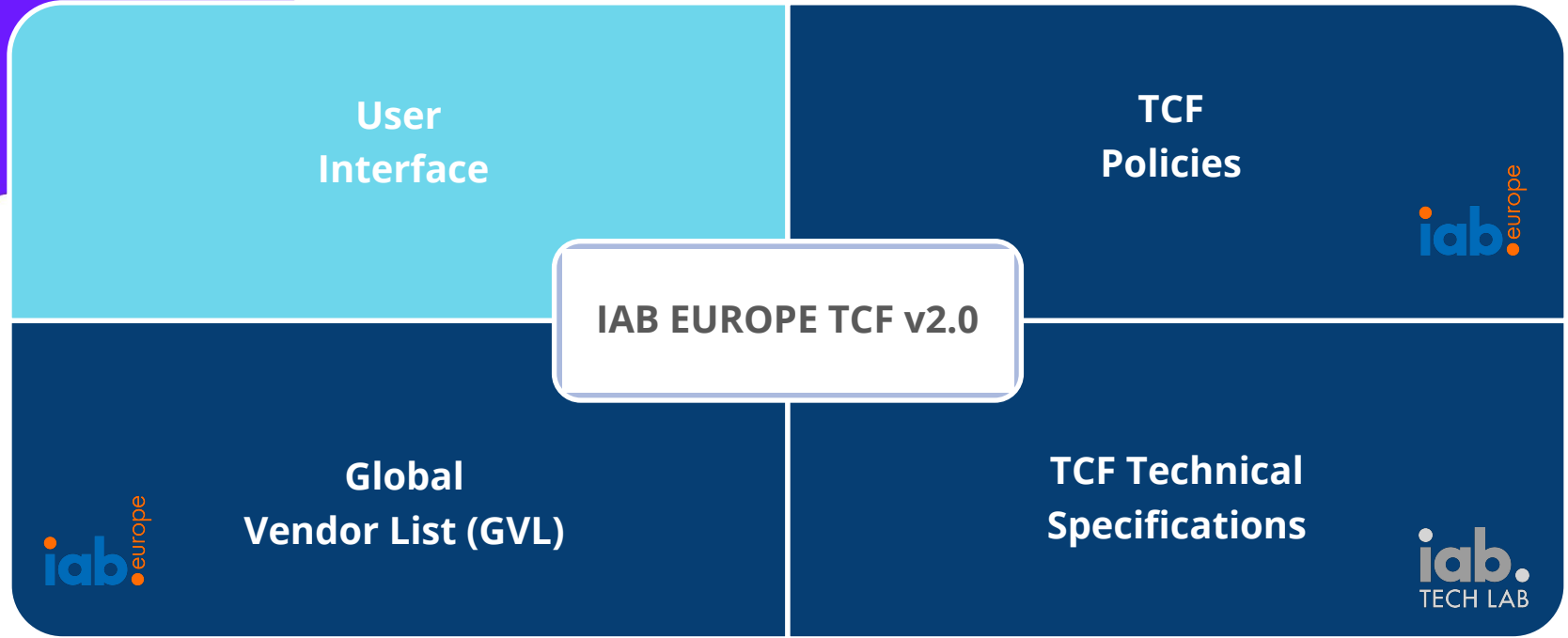
- WHY WAS THE TCF CREATED?
- WHO MANAGES THE TCF?

WHY THE NEED FOR THE TCF?



HOW THE TCF HELPS?




User
Interface
TCF
Policies
IAB EUROPE TCF v2.0
Global
Vendor List (GVL)
TCF Technical
Specifications
Decentralized
Central Governance

CREATING & SHAPING TCF V2.0

- TCF v2.0 is the product of 12 months of reflection begun in response to feedback from the market, notably publishers, and from EU Member State data protection authorities (DPAs)
- The Policy and Technical Specifications for the TCF v2.0 was open to public comment for 30 days from 25th of April to 25th May 2019
- Following the close of the public comment period, the technical specifications and Policies comments were reviewed by the TCF Steering Group and its working groups to develop the final version for the launch.
- **TCF v2.0 was launched on 21st August 2019.**

TCF V2.0 CMPS & VENDORS' FOCUS

INTRODUCING TCF V2.0 for CMPS and vendors

- **NEW** technical specifications that enable CMPs to capture, store and signal consent and right to object
- **NEW** signals to allow Publishers to exercise more control over Vendors by purpose
- **NEW** explicit signals for a Vendor's transparency status
- **NEW** policies incorporating stakeholder feedback, most notably from the publisher community and regulators
- **MORE** granular and **NEW** purposes, definitions and signals

THE TCF BENEFITS ALL STAKEHOLDERS

AND MOST IMPORTANTLY, FOR THE USER...

TCF provides both transparency over the use of their data and control regarding their personal data.

TCF V2.0 POLICIES

FLEXIBLE VENDOR LEGAL BASES

- TCF v2.0 allows Vendors to register flexible legal bases, and default legal bases, for example:
  - Purpose 1 – consent
  - Purpose 2 – consent or legitimate interest (default: legitimate interest)
  - Purpose 3 – consent
  - Purpose 4 – consent or legitimate interest (default: consent)

- Publishers may use new Publisher controls to switch from the default legal basis if Vendor allows.

PUBLISHER CONTROLS

- TCF v2.0 allows Publishers to create different rules for different Vendors or ranges of Vendors, for example:
  - All Vendors are allowed to do Purposes 1, 2, 4
  - Only Vendors X, Y, and Z are allowed to do Purpose 3
  - Only Vendors A, B, and C are allowed to do Purposes 7, 8
- Publisher controls are written in the Transparency & Consent String and Vendors are required to respect them and act accordingly.

IMPROVED SUPPORT FOR LEGITIMATE INTEREST

- TCF v2.0 includes additional signals to TCF v1.0, importantly in relation to processing under legitimate interests

- Vendors will have a signal that tells them whether transparency (without consent) has been established for legitimate interests by Vendor and Purpose

- Users can now exercise their right to object directly in CMPs and objections signaled to Vendors by Vendor and Purpose

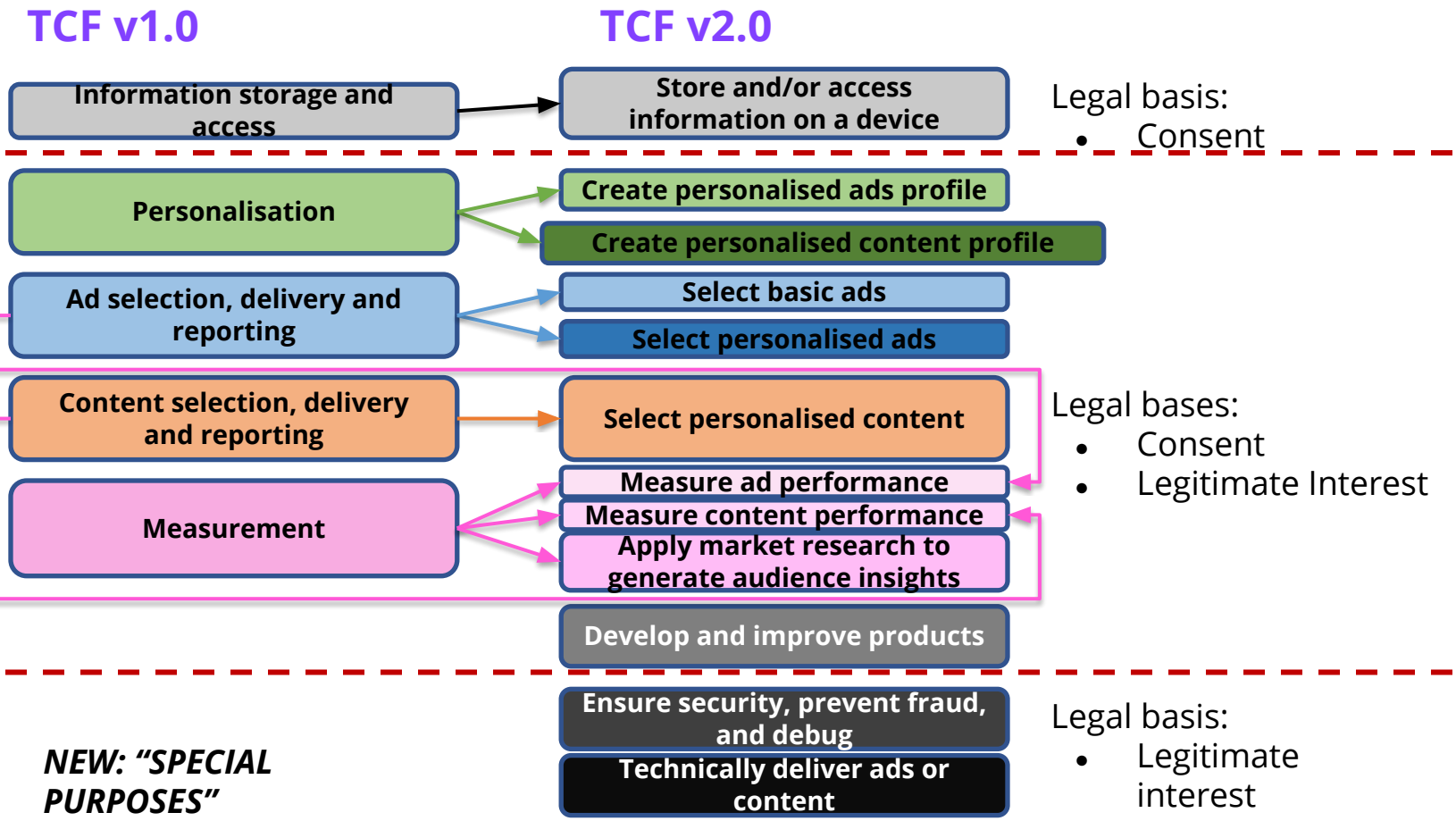
TCF V2.0 DATA PROCESSING PURPOSES

PURPOSES, FEATURES & STACKS

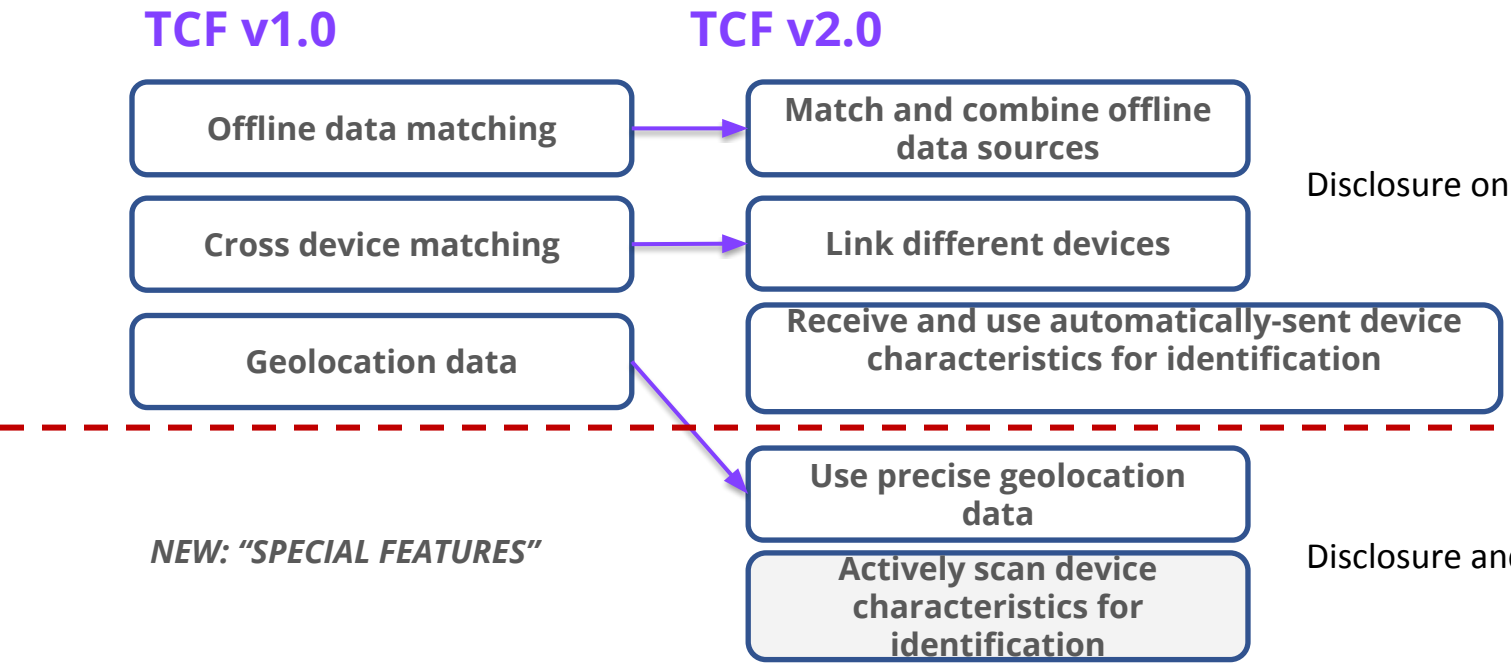
- The TCF V2.0 standardises Purposes, Special Purposes, Features, Special Features and Stacks
  - Standard names of purposes and stacks
  - Standard legal and user friendly (special) purpose and (special) feature language, and stack descriptions
  - Standard translations
- CMPs must use -- without modification -- the standardised purpose names, descriptions or translations.
- Publishers may change stack descriptions under certain conditions.
- As under v1.0, purpose limitation applies. Vendors are limited to doing what is covered in the Purposes for which they have permissions.

TCF PURPOSES v2.0

NB: No backwards compatibility between v1.0 and v2.0 Purposes



TCF V2.0 FEATURES



Disclosure only.

NEW: "SPECIAL FEATURES"

Disclosure and opt-in required.

NEW UI ELEMENTS: STACKS

Purpose “Stacks” enable Publishers to present granular purposes in a simplified manner, without depriving users of more granular information and choice.

For example

combine into

Personalised ads, and ad measurement

“Ads will be personalised based on a profile. More data will be added to better personalise ads. Ad performance will be measured.”

TCF V2.0 POLICIES SUMMARY

- **NEW** signals to allow Publishers to exercise more control over Vendors by purpose
- **NEW** explicit signals for a Vendor's transparency status
- **NEW** signals for users who object to processing on the basis of a legitimate interest
- **MORE** granular and **NEW** purposes, definitions and signals

TCF Technical Specifications

Jennifer Derke

Director of Product, Programmatic/Automation

IAB Tech Lab

TCF Technology Basics (Same Foundations in v2.0)

Who “makes” the TC String?

- CMP (Consent Management Provider)

How is user choice collected?

- CMP provides a User Interface to collect consumer consent

How is user choice communicated?

- CMP writes a TC String that vendors will read, establishing vendor transparency and communicating user preferences to the ad tech providers

Overview of v2 Tech Specs Updates

Framework specification	**What's new?**	**What should developers look for?**
Transparency and Consent String	New purposes; Publisher controls; more comprehensive legal basis establishment for vendors	String size has increased, pay attention for relevant HTTP GET request implementation guidelines. Ad tech vendors will need to update string parsing. Join code library dev efforts to share resources.
Global Vendor List Format	Supports v2 policy; better future-facing version control	Use new version control fields to support parsing of the TC String
Consent Management Provider JavaScript API	Incorporated mobile in-app JS API support; streamlined design for pinging on page API; supports calls for v2 TC String	Look for Event Listeners support, and new nomenclature for all API calls in v2.

TC String Updates - String includes new signals

TCF version 2.0 Transparency and Consent String Contents:

- General Metadata
- User Consent
- Legitimate Interest
- Publisher Controls
    - purposes
    - legal basis*

CMP ID	Vendor Consent	Purpose Consent	Vendor LI	Purpose LI	Special Feature opt-in	Global consent	OOB Allowed?	Custom Stacks	Pub Controls
###	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	###

Blue: Present in v1.0
Green: New in v2.0

* only if the Vendor indicates flexibility

More information in TCF v2.0's TC String

Technical challenge: How to incorporate maximum flexibility for vendors and control for publishers in v2.0?

- Part 1: Publisher Vendor Restrictions to be fully Incorporated Into the Consent Gathering Process
- Part 2: A Combined Transparency & Consent String

Example CMP Workflow Supporting TCF v2.0 TC String

- Estimates the TC string size based on publishers' restrictions
- Displays consent dialog to user and generates a TC string recording user's action.
- Stores the TC string in a browser cookie or alternative storage (e.g. local storage).
- Makes the TC string available to downstream vendors via the CMP JS API.

Example Vendor Workflow Supporting TCF v2.0 TC String

For web inventory, a vendor (e.g. DMP) can access the TC string in 2 ways:

- Via CMP JS API
- Receive the TC string from other upstream vendors that they interact with, even if the vendor does not directly interact with the publisher/CMP.

For mobile app inventory, a vendor can access the TC string in 2 ways:

- Via local storage.
- Receive the TC string from other upstream vendors that they interact with, even if the vendor does not directly interact with the publisher/CMP.

We recommend that vendors send the full TC string to their downstream vendors, if a downstream vendor has some consent or established LI for some purposes.

Building resources to support v2 adoption

GDPR Technical working group planned support for adoption of v2:

- Enhance and Expand implementation support
  - wiki and ‘living FAQ’ resources for vendors, CMPs, publishers
- TCF Code Library ‘Toolkit’
  - string encoding, shared developer resources
- Tools to validate/QA v2 TC strings
  - inspector/encoder/decoder

https://github.com/InteractiveAdvertisingBureau/GDPR-Transparency-and-Consent-Framework/tree/master/TCFv2

TCF V2.0
REGISTRATION

REGISTRATION

Registration to TCF v2.0 opens in the course of September 2019.

TCF v2.0 will operate in market alongside TCF v1.1 through to the close of Q1 2020. This will provide publisher websites and CMPs with an appropriate timeframe in which to adopt TCF v2.0.

It also provides the vendors they work with sufficient time to develop and implement the code needed to adhere to the protocol of TCF v2.0.

FOR MORE INFORMATION:

www.iabeurope.eu/tcf

Policy questions: framework@iabeurope.eu

Technical: transparencyframework@iabtechlab.com

TCF V2.0 CMPS & VENDORS' FOCUS

Q&A

THANK YOU