THE TRANSPARENCY & CONSENT FRAMEWORK (TCF) V2.0

FULL OVERVIEW FOR PUBLISHERS

iabeurope.eu
WELCOME
AGENDA

Speakers:
● Stevan Randjelovic, Brand Safety Manager, Group M
● Christoph Zippel, Senior Legal Counsel, RTL
● Jennifer Derke, Director of Product, Programmatic/Automation, IAB Tech Lab

Presentation: TCF v2.0 for Publishers (40 min)
● The TCF Evolution
● TCF v2.0 Publishers’ Focus
● TCF v2.0 Policies Overview
● TCF v2.0 Data Processing Purposes
● TCF v2.0 Technical specifications
● TCF v2.0 Registration
● Registration to TCF v2.0

Q&A (30 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?

Website.com

Ad Space

Who is allowed to receive data?

Ad Exchange

Do I have consent?

Ad Tech

Am I disclosed?

Ad Tech

Ad Tech

Ad Tech

Ad Tech

Ad Tech

Ad Tech

Ad Tech

Ad Tech

OK
HOW THE TCF HELPS?

Global Vendor List (GVL)
- Name
- Privacy Policy Link
- Purposes
- Legal Bases
- etc.

CMP

Ad Exchange

Website.com

Ad Space

Ad Space

Ad Space
IAB EUROPE TCF v2.0

User Interface

TCF Policies

Global Vendor List (GVL)

TCF Technical Specifications

Decentralized

Central Governance
THE TCF FOR PUBLISHERS

Publishers following the TCF Policy specifically perform the following:

• Select and control vendors they want to work with;

• Provide users with transparency into the vendors selected by the publisher, and the purposes for which they process data;

• Request and obtain informed consent to process data, or establishing other legal bases to process data;

• Transparently pass information relating to user choices to the ecosystem;

• Either act as a CMP (in which case they would need to register as a CMP in the TCF) or utilise the services of a CMP registered with the TCF;

• Support the use of data for measuring campaign effectiveness and the use of contextual advertising that requires access to user devices.
THE TCF BENEFITS ALL STAKEHOLDERS

**PUBLISHERS** - A scalable, efficient way to ensure that publishers’ preferred technology partners have a GDPR legal basis for processing their readers’ personal data and that publishers can transmit information to their readers and those partners in an interoperable manner throughout the ecosystem.

**CMPs** - Technical specifications and policies that enable CMPs to capture and communicate information about preferred technology partners and user choices associated with those technology partners, based on a standardized and interoperable signal.

**Vendors** - A mechanism for ensuring the necessary disclosures have been made and user choices reflected, so that vendors can process user data and access user devices legally.

**Advertisers** - Transparency to users about advertisers’ preferred vendors.

AND MOST IMPORTANTLY, FOR THE USER...
TCF provides both transparency over the use of their data and control regarding their personal data.
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 vision for TCF v2.0 was to provide enhanced transparency and choice to consumers and greater control to publishers.

- 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 PUBLISHERS’ FOCUS
INTRODUCING TCF V2.0

• 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

OVERALL BENEFITS: BETTER INFORMED USERS & SUPPORTS THE BROADER INTERESTS OF THE INDUSTRY
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.
TCF v2.0 allows Publishers to create different rules for different Vendors or ranges of Vendors, for example:

- All Vendors may process based on Purposes 1, 2, 4
- Only Vendors X, Y, and Z may process based on Purpose 3
- Only Vendors A, B, and C may process based on Purposes 7, 8

Publisher controls are communicated via 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 related to processing based on legitimate interests
- Vendors signaled whether transparency has been established for legitimate interests by Vendor and Purpose
- Users can exercise their right to object directly in CMPs, which communicate the objection by Vendor and Purpose
TCF V2.0 DATA PROCESSING PURPOSES
The TCF 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

TCF v1.0
- Information storage and access
- Personalisation
- Ad selection, delivery and reporting
- Content selection, delivery and reporting
- Measurement

TCF v2.0
- Store and/or access information on a device
- Create a personalised ads profile
- Select basic ads
- Select personalised ads
- Create a personalised content profile
- Select personalised content
- Measure ad performance
- Measure content performance
- Apply market research to generate audience insights
- Develop and improve products

NEW: “SPECIAL PURPOSES”
- Ensure security, prevent fraud, and debug
- Technically deliver ads or content

Legal basis:
- Consent
- Legitimate Interest

NB: No backwards compatibility between v1.0 and v2.0 Purposes
TCF V2.0 FEATURES

- Offline data matching
- Cross device matching
- Geolocation data

TCF v1.0

- Offline data matching
- Cross device matching
- Geolocation data

TCF v2.0

- Match and combine offline data sources
- Link different devices
- Receive and use automatically-sent device characteristics for identification
- Use precise geolocation data
- Actively scan device characteristics for identification

NEW: “SPECIAL FEATURES”

Disclosure only.

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

Basic ads + Personalised ads profile + Show personalized ads + Ad Measurement

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 Tech Basics (Same Foundations in v2.0)

Who “makes” the TC String?
- CMP (Consent Management Provider)

How is user choice collected?
- CMP offering provides a User Interface to provide transparency to users, collect consent, and allow for objection

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
## TCF V2.0 Technical Specifications: What’s new?

<table>
<thead>
<tr>
<th>Framework specification</th>
<th>What’s new?</th>
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</thead>
<tbody>
<tr>
<td>Transparency and Consent String v2</td>
<td>New purposes; Publisher controls; more comprehensive legal basis establishment for vendors</td>
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<tr>
<td>Global Vendor List Format v2</td>
<td>Supports v2 policy; better future-facing version control</td>
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<tr>
<td>Consent Management Provider JavaScript API v2</td>
<td>Incorporated mobile in-app JS API support; streamlined design for pinging on page API; supports calls for v2 TC String</td>
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TC String Updates - Benefits for Publishers

TCF version 2.0 Transparency and Consent String Contents:

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

<table>
<thead>
<tr>
<th>CMP ID</th>
<th>Vendor Consent</th>
<th>Purpose Consent</th>
<th>Vendor LI</th>
<th>Purpose LI</th>
<th>Special Feature opt-in</th>
<th>Global consent</th>
<th>OOB Allowed?</th>
<th>Custom Stacks</th>
<th>Pub Controls</th>
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* only if the Vendor indicates flexibility

Blue: Present in v1.0
Green: New in v2.0
More information in TCF v2.0’s TC String

Technical challenge: How to incorporate maximum flexibility 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
How do publisher choices get reflected in v2.0 strings?

What does publisher need to do?

The publisher would make the following choices and either:

1. record any (optional) publisher controls using a standardized CMP configuration, and/or
2. work with a CMP to gather consent/display info in the consent dialog.
   - whitelisted vendors (optional)
   - restricted purposes by vendor (optional)
   - preferred/required legal bases per purpose (optional)
Other TCF Specification Changes - GVL

Global Vendor List supports new flexibility for Vendor Registration

Also, Vendors need to be able to **read** the new (potentially large) TCF v2.0 TC Strings

- In addition to flexible legal basis registration in GVL, vendors will also communicate their “overflow” support of potentially large TC strings, expressing their current capabilities for httpGETlimit (expected value of 32 or 128)
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

TCF V2.0 REGISTRATION
REGISTRATION

Registration to TCF v2.0 opens in 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.

Registration for the Global Vendor List (GVL) and CMP list is open for vendors and CMPs to apply for approval to operate in the IAB Europe Transparency and Consent Framework (TCF).

Publishers do not need to register or pay to be a part of the TCF.

The registration process facilitates adherence to the TCF Policy and Terms & Conditions by both Vendors and CMPs to provide transparency into how companies intend to comply with GDPR requirements, centralised into one location. Publishers can view the GVL and CMP list to see if their CMP and Vendors are registered.
TCF V2.0 PUBLISHERS
FOCUS

Q&A
FOR MORE INFORMATION:

www.iabeurope.eu/tcf

Policy questions: framework@iabeurope.eu
Technical: transparencyframework@iabtechlab.com
THANK YOU