Training 5: Getting it right!
(Part 1) The do’s and don’ts of a CMP – technical implementation

Patrick Verdon
Technical Director, IAB Europe

iaburope.eu
Agenda

- Technical implementation overview
  - TCF v2 incompatible with v1
  - CMP configuration - global & service-specific
  - TCF v2 CMP API interface
  - TCData object
  - Where should a TC String be stored?
  - Loading the Global Vendor List (GVL)
  - Publisher restrictions

- Q&A
TCF v2 incompatible with v1

- It is **not possible** to translate a v1 Consent String to a v2 TC String
- V1 has 5 Purposes & 3 Features
- V2 has 10 Purposes, 2 Special Purposes, 3 Features, 2 Special Features
- Different legal definitions. Breach of policies to translate
- All users must be re-consented for v2
**CMP configuration - global & service-specific**

- CMPs must be configured in a global or service-specific context
  - **Global context**
    - User choices are shared by CMPs running on different sites
  - **Site-specific context**
    - User choices are only used by the publisher site
- `isServiceSpecific` must be set in the TC String accordingly
TCF v2 CMP API interface

- `__cmp()` becomes `__tcfapi()`

- New API command `getTCData` replaces `getConsentData`, `getPublisherConsents`, `getVendorConsents`

- Required commands: `ping`, `getTCData`, `addEventListener`, `removeEventListener`

```javascript
__tcfapi('getTCData', 2, function(tcData, success) {
  if (success) {
    console.log(tcData);
  } else {
    // Do something
  }
});
```
TCData object

```python
tcData

  t {cmpId: 96, cmpVersion: 2, gdprApplies: true, tcfPolicyVersion: 2, tcString: "COui-0-Oui-0-BgACAENAWCoAP_AAh_AAAAAD1wBQABAAGAAQAcIA9YD1wBQABAAGAAQAcIA9YAA", ...
  cmpId: 96
  cmpVersion: 2
  gdprApplies: true
  tcfPolicyVersion: 2
  tcString: "COui-0-Oui-0-BgACAENAWCoAP_AAh_AAAAAD1wBQABAAGAAQAcIA9YD1wBQABAAGAAQAcIA9YAA"
  eventStatus: "useractioncomplete"
  isServiceSpecific: true
  useNonStandardStacks: false
  purposeOneTreatment: false
  publisherCC: "AA"
  outOfBand: {allowedVendors: {...}, disclosedVendors: {...}}
  purpose: {consents: {...}, legitimateInterests: {...}}
  vendor: {consents: {...}, legitimateInterests: {...}}
  specialFeatureOptins: {1: true}
  publisher: {consents: {...}, legitimateInterests: {...}, customPurpose: {...}, restrictions: {...}}
```
TCData object

- tcData.purpose
  - ▼{consents: {...}, LegitimateInterests: {...}}
    - consents: {1: true, 2: true, 3: true, 4: true, 5: true, 6: true, 7: true, 8: true, 9: true, 10: true}
    - legitimateInterests: {1: false, 2: true, 3: true, 4: true, 5: true, 6: true, 7: true, 8: true, 9: true, 10: true}

- tcData.vendor
  - ▼{consents: {...}, LegitimateInterests: {...}}

- tcData.publisher
  - ▼{consents: {...}, LegitimateInterests: {...}, customPurpose: {...}, restrictions: {...}}
    - consents: {}
    - legitimateInterests: {}
    - customPurpose: {consents: {...}, legitimateInterests: {...}}
    - restrictions: {}

- tcData.specialFeatureOptions
  - ▼{1: true}
    - 1: true
Where should a TC String be stored?

- **Global context**
  - 3rd-party .consensu.org cookie called ‘euconsent-v2’
  - Global cookie must not be called ‘euconsent’ (v1 only)
  - Signals in existing TC String must not be overwritten

- **Service-specific context**
  - Storage mechanism up to CMP
  - Must not be stored as a local cookie called ‘euconsent’ (v1 only)
  - Note size limits of cookies where there are many publisher restrictions
Loading the Global Vendor List (GVL)

- **Strict cache requirements**
  - CMPs must load the GVL from the back-end
  - Client-side requests will access a CMP's back-end GVL
  - Cache-control headers must be honoured by the back-end
  - Cache currently set to 7 days = 1 request per CMP per week

- **Purpose translations & Global CMP List**
  - The caching requirements also apply to these resources

- **Monitoring**
  - We will block access to IPs making too many requests
Publisher restrictions

- **Purposes** - restrict the purposes processed by vendors
- **Legal basis** - specify the legal basis that vendors must operate on for a purpose, if the vendor has indicated a flexible legal basis

```javascript
isServiceSpecific: true
vendors_: 
  ▼8:
    ▼8:
      id: 8
      name: "Emerse Sverige AB"
      ▶purposes: (3) [1, 3, 4]
      ▶legIntPurposes: (4) [2, 7, 8, 9]
      ▶flexiblePurposes: (2) [2, 9]
      ▶specialPurposes: (2) [1, 2]
      ▶features: (2) [1, 2]
      ▶specialFeatures: []
      ▶policyUrl: "https://www.emerse.com/privacy-policy/"
      ▶__proto__:: Object
```
Q&A
GET IN TOUCH

For general questions about the TCF: framework@iabeurope.eu

For questions about CMP compliance: tcf.compliance@iabeurope.eu
THANK YOU