

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

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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`

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

TCDATA object

> 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: {...}} ⓘ

▶ consents: {1: false, 2: true, 3: false, 4: false, 5: false, 6: true, 7: false, 8: true, 9: false, 10: false, 11: false, 12: false, 13: false, 14: false, 15: false, 16: false, 17: false, 18: false, 19: false, 20: false, 21: false, 22: false, 23: false, 24: false, 25: false, 26: false, 27: false, 28: false, 29: false, 30: false, 31: false, 32: false, 33: false, 34: false, 35: false, 36: false, 37: false, 38: false, 39: false, 40: false, 41: false, 42: false, 43: false, 44: false, 45: false, 46: false, 47: false, 48: false, 49: false, 50: false, 51: false, 52: false, 53: false, 54: false, 55: false, 56: false, 57: false, 58: false, 59: false, 60: false, 61: false, 62: false, 63: false, 64: false, 65: false, 66: false, 67: false, 68: false, 69: false, 70: false, 71: false, 72: false, 73: false, 74: false, 75: false, 76: false, 77: false, 78: false, 79: false, 80: false, 81: false, 82: false, 83: false, 84: false, 85: false, 86: false, 87: false, 88: false, 89: false, 90: false, 91: false, 92: false, 93: false, 94: false, 95: false, 96: false, 97: false, 98: false, 99: false, 100: false}

▶ legitimateInterests: {1: false, 2: true, 3: false, 4: false, 5: false, 6: true, 7: false, 8: true, 9: false, 10: false, 11: false, 12: false, 13: false, 14: false, 15: false, 16: false, 17: false, 18: false, 19: false, 20: false, 21: false, 22: false, 23: false, 24: false, 25: false, 26: false, 27: false, 28: false, 29: false, 30: false, 31: false, 32: false, 33: false, 34: false, 35: false, 36: false, 37: false, 38: false, 39: false, 40: false, 41: false, 42: false, 43: false, 44: false, 45: false, 46: false, 47: false, 48: false, 49: false, 50: false, 51: false, 52: false, 53: false, 54: false, 55: false, 56: false, 57: false, 58: false, 59: false, 60: false, 61: false, 62: false, 63: false, 64: false, 65: false, 66: false, 67: false, 68: false, 69: false, 70: false, 71: false, 72: false, 73: false, 74: false, 75: false, 76: false, 77: false, 78: false, 79: false, 80: false, 81: false, 82: false, 83: false, 84: false, 85: false, 86: false, 87: false, 88: false, 89: false, 90: false, 91: false, 92: false, 93: false, 94: false, 95: false, 96: false, 97: false, 98: false, 99: false, 100: false}

> tcData.publisher

< ▼ {consents: {...}, LegitimateInterests: {...}, customPurpose: {...}, restrictions: {...}} ⓘ

▶ consents: {}

▶ legitimateInterests: {}

▶ customPurpose: {consents: {...}, legitimateInterests: {...}}

▶ restrictions: {}

> tcData.specialFeatureOptins

< ▼ {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

```
isServiceSpecific: true
```

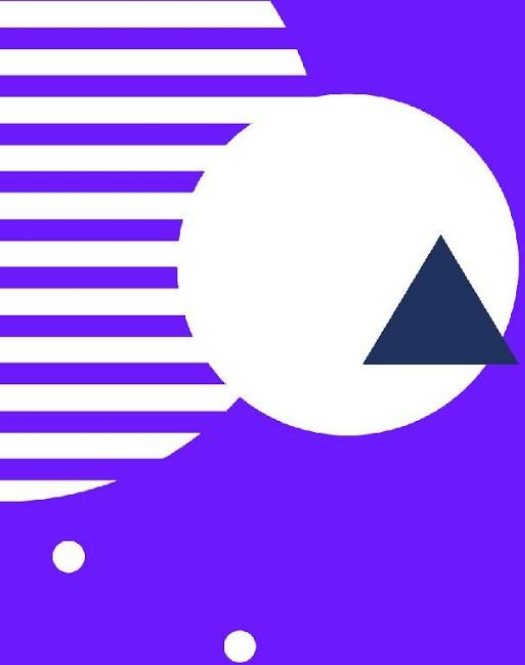
```
vendors_:
```

```
▼ 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
```



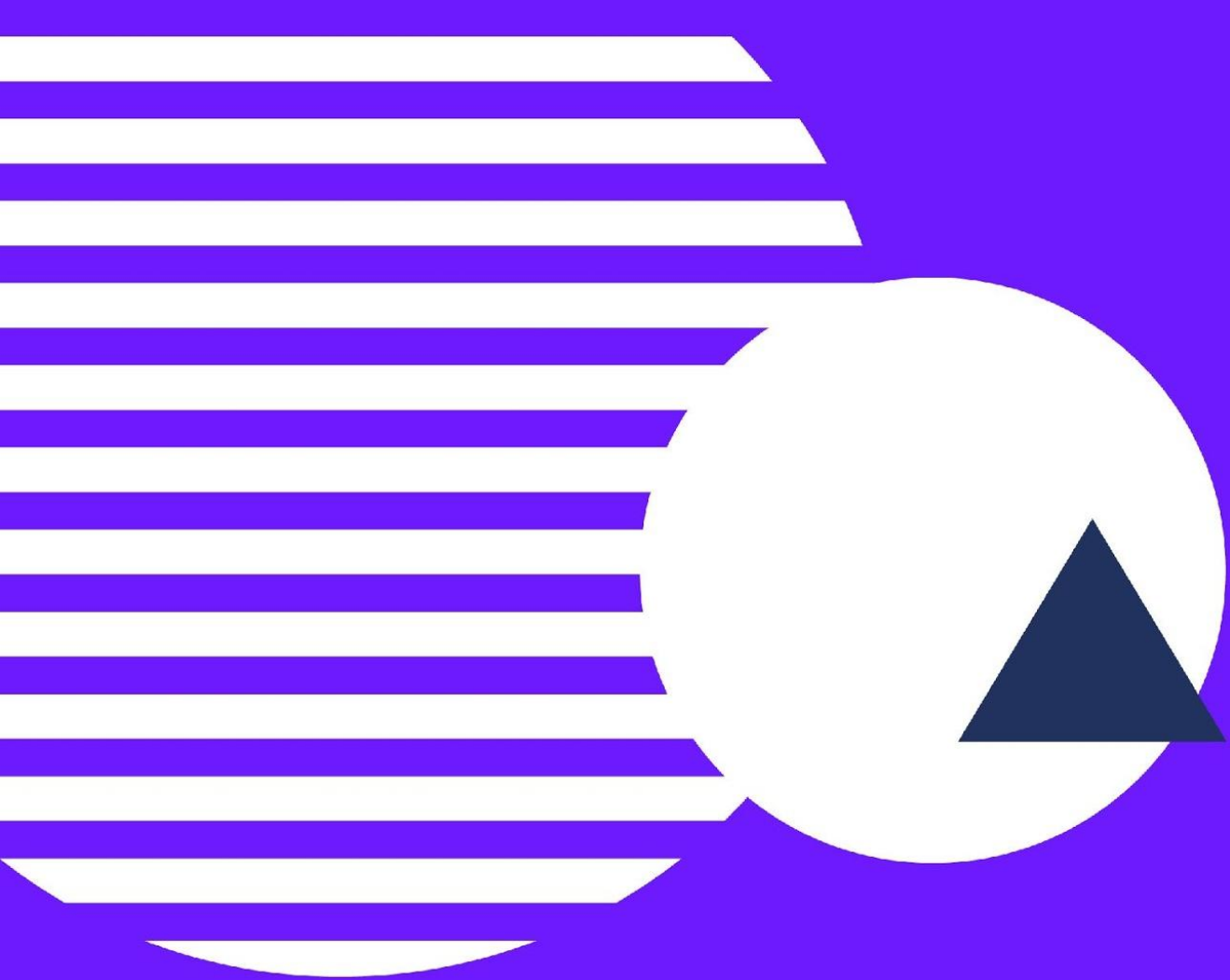
Q&A



GET IN TOUCH

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

**For questions about CMP compliance:
tcf.compliance@iabeurope.eu**



THANK YOU