A large graphic on the left side of the slide. It features a solid purple circle at the top left, a dark blue circle at the top right, and a purple circle with horizontal white stripes at the bottom right. The text is overlaid on the purple circles.

THE TRANSPARENCY & CONSENT FRAMEWORK (TCF) v2.0

POLICY CHECK 101

iab europe.eu

WORKSHOP OVERVIEW

- **Training 1: Policy Check 101**
- **Training 2: CMP UIs**
- **Training 3: Switching from v1.1 to v2.0**
- **Training 4: Resource overview**
- **Training 5: Technical implementation for CMPs**
- **Training 6: Technical implementation for Vendors**
- **Training 7: CMP validation process**
- **Training 8: Switching from v1.1 to v2.0**
- **Training 9: Q&A for CMPs**
- **Training 10: Q&A for Vendors**

AGENDA

Speakers

- Alice Lincoln, Senior Vice President, MediaMath
- Matthias Matthiesen, Senior Privacy Counsel, Quantcast
- Filip Sedefov, Privacy & Data Protection Manager, IAB Europe
- Colombe Michaud, Programme Manager, IAB Europe
- Helen Mussard, Marketing & Business Strategy Director, IAB Europe

Content

- TCF v2 policies (30 min)

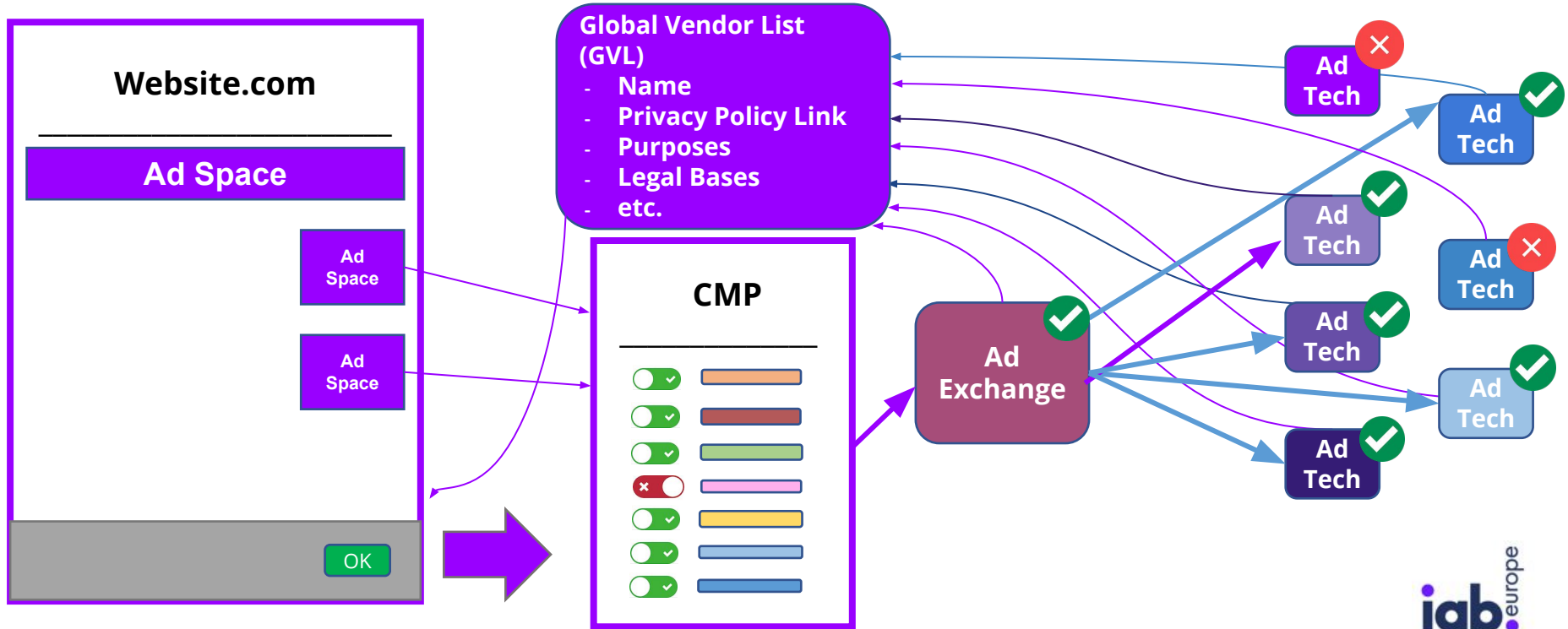
- What is the TCF?
- What's new in TCF v2.0?
 - Policies
 - Data processing purposes
- Registration & Support

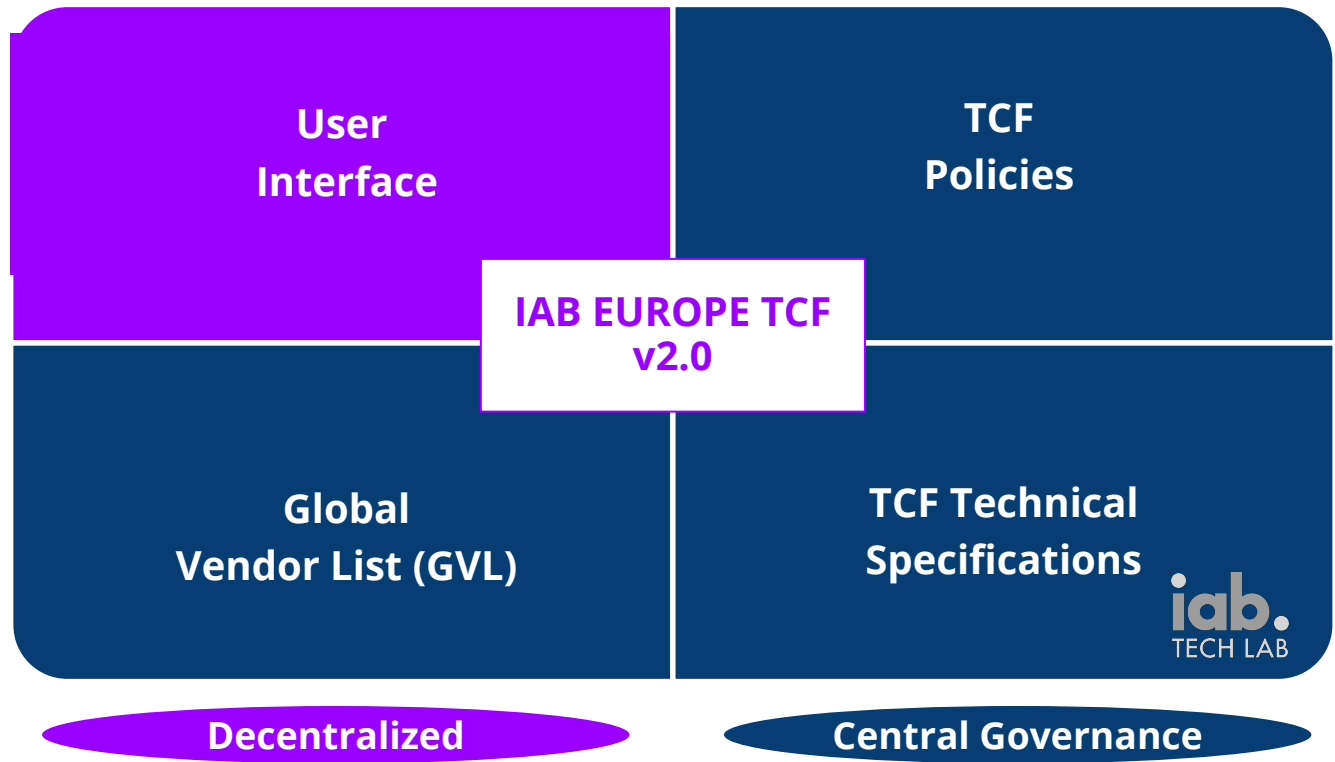
- Q&A (30 min)



WHAT IS THE TCF?

HOW THE TCF HELPS?





BENEFITS

Publishers

- Ensure tech partners have a legal basis and transmit information about users and partners throughout the ecosystem

CMPs

- Capture and communicate information about preferred tech partners and user choices based on standardised & interoperable signal

Vendors

- Ensure necessary disclosures have been made and user choices reflected, enabling vendors to process user data and access user devices legally

Advertisers

- Transparency to users about advertiser's preferred vendors.

Users

- Transparency & control over the use of their personal data



WHAT'S NEW IN TCF v2.0?



TCF v2.0 POLICIES

NEW IN THE POLICIES: GENERAL

- New expanded “Definitions” section (“Vendor”, “UI”, “Purpose”, etc.)
- Detailed requirements for public attestations of compliance with TCF policies.
- Responsibility to notify MO (IAB Europe) of non-compliant practices.
- CMPs are responsible for ensuring compliance of its UIs and Signals
- Record-keeping: UIs, consent, signals

NEW IN THE POLICIES: FLEXIBLE LEGAL BASIS

- Flexible legal basis: 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 allowed by the Vendor.

NEW IN THE POLICIES: PUBLISHER CONTROL

Publisher controls: allowed LB, Purposes & Vendors

- 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 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.

NEW IN THE POLICIES: LEGITIMATE INTEREST

- TCF v2.0 offers improved support for the legitimate interest legal basis
- Legitimate interest legal basis – additional signals
 - Positive “1” signal where transparency
 - Negative “0” signal where no disclosure
 - Negative “0” signal where user objection

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

NEW IN THE POLICIES: PURPOSES, FEATURES & STACKS

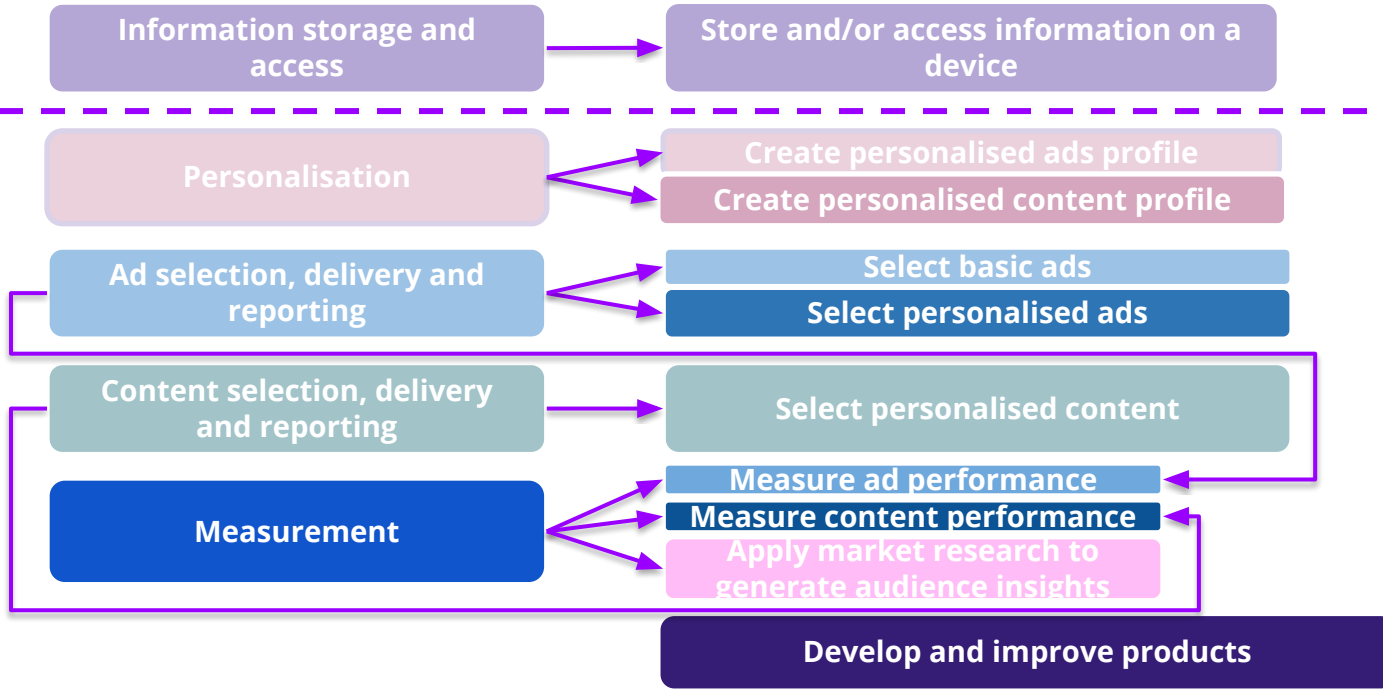
- The TCF v2.0
 - standardises Purposes, Special Purposes, Features, Special Features and Stacks...
 - with standard legal and user friendly (special) purpose and (special) feature language, stack descriptions & translations
 - CMPs must use -- without modification -- the standardised purpose names, descriptions or translations
- Purpose limitation applies (idem v1)
 - Vendors are limited to doing what is covered in the Purposes for which they have permissions
 - Vendor guidance added in Appendix A
- Publishers may change stack descriptions under certain conditions.

NEW: TCF PURPOSES v2.0

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

TCF v1.0

TCF v2.0

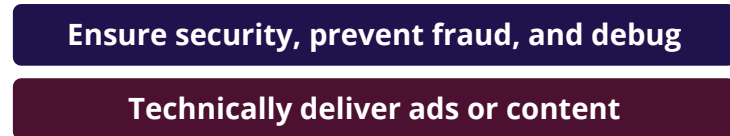


Legal basis:
Consent

Legal bases:

- Consent
- Legitimate Interest

NEW: SPECIAL PURPOSES



Legal basis:

- Legitimate interest

TCF V2.0 FEATURES

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

Disclosure only.

Disclosure and opt-in required.

NEW: "SPECIAL FEATURES"

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.”

TRANSPARENCY AND CONSENT 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

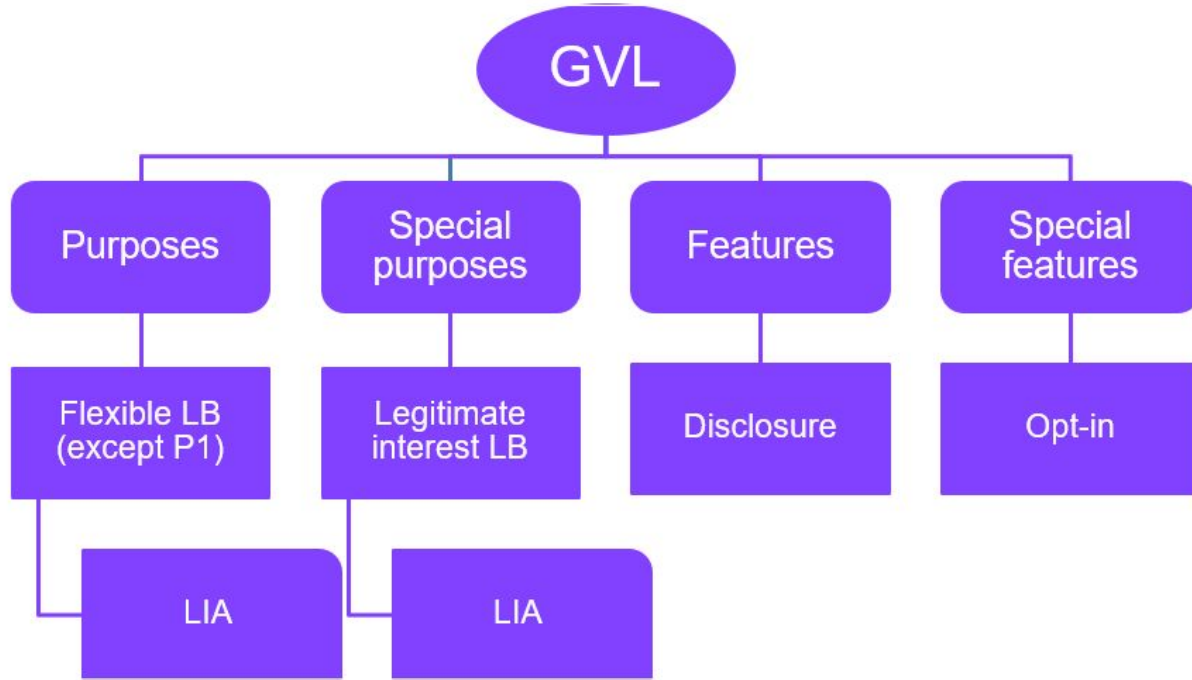
Green: New in v2.0

* only if the Vendor indicates flexibility



TCF v2.0 REGISTRATION

GVL REGISTRATION PROCESS





INFORMATION & REGISTRATION

For more information visit www.iabeurope.eu/tcf

Policy questions: framework@iabeurope.eu

Technical: transparencyframework@iabtechlab.com

Registrations to TCF v2.0 opened in September 2019.

TCF v2.0 will operate in market alongside TCF v1.1 through until the close of Q1 2020.

You can register for TCF v2 at <https://register.consensu.org/>



THANK YOU!

Q&A

New in the policies – Definitions & CMPs

- New, more elaborate definitions ("vendor", "UI", "Purpose", etc.)
- Detailed requirements for public attestation of compliance with TCF Policies
- Legitimate interest legal basis:
 - Positive signal where transparency
 - Negative signal where no disclosure / user objection
- Special features: affirmative opt-in
- Req. for CMPs to est. LB only through GVL declarations using standard Purpose definitions
- Publisher-specific custom LB signals – policy 5(11)
- Publishers can be required to use Vendor-operated CMPs
- CMPs are responsible for compliance of their UI
- CMPs must notify MO of Publisher non-compliance
- MO can notify Publisher suspension to CMPs

New in the policies – Vendors

- Detailed requirements for public attestation of compliance with TCF Policies.
- Requirement to notify MO of non-compliant CMPs
- Requirement to respect most recent CMP & Vendor signals
- Default no permission if cannot process or act in accordance with signals
- Explicit prohibition to create / alter signals
- New policies on “Working with Publishers” (compliance, notification, respect of less permissive contractual obligations, software compatibility)
- Record keeping: consent, signals.
- Storage and access: consent unless legal exemption
- GVL (see next slide)
- OOB legal basis + conditions
- Transfer of data outside TCF

New in the policies – Publishers

- Detailed requirements for public attestation of compliance with TCF Policies.
- Publishers must notify the MO about CMP & Vendor non-compliance.
- Publisher controls: Publishers can specify Vendors, allowed LB and Purposes (in line with contractual obligations)
- Software compatibility
- Managing purposes and legal bases: Publishers cannot modify names, definitions and/or translations or instruct CMP to do so.
- Stacks: can substitute or supplement purpose descriptions. Can only be modified under certain conditions.
- UI must be resurfaced if required by MO due to changes in the TCF.

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

Blue: Present in v1.0

Green: New in v2.0

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	###



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 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.

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