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?

Website.com

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

CMP

Ad Exchange
**BENEFITS**

<table>
<thead>
<tr>
<th><strong>Publishers</strong></th>
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<tbody>
<tr>
<td>• Ensure tech partners have a legal basis and transmit information about users and partners throughout the ecosystem</td>
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<tr>
<th><strong>CMPs</strong></th>
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<tr>
<td>• Capture and communicate information about preferred tech partners and user choices based on standardised &amp; interoperable signal</td>
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<tr>
<th><strong>Vendors</strong></th>
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<tr>
<td>• Ensure necessary disclosures have been made and user choices reflected, enabling vendors to process user data and access user devices legally</td>
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<tr>
<th><strong>Advertisers</strong></th>
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<tr>
<td>• Transparency to users about advertiser’s preferred vendors.</td>
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<tr>
<th><strong>Users</strong></th>
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<tr>
<td>• Transparency &amp; control over the use of their personal data</td>
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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

**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 personalised ads profile
- Create personalised content profile
- Select basic ads
- Select personalised ads
- Select personalised content
- Measure ad performance
- Measure content performance
- Apply market research to generate audience insights

Legal basis:
- Consent

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

Legal basis:
- Legitimate interest

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

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.”
**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*

<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*
GVL REGISTRATION PROCESS

- Purposes
  - Flexible LB (except P1)
  - Legitimate interest LB
  - LIA

- Special purposes
  - Legitimate interest LB
  - LIA

- Features
  - Disclosure

- Special features
  - Opt-in
INFORMATION & REGISTRATION

For more information visit www.iab europe.eu/tcf

Policy questions: framework@iab europe.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
- UI records
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
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