Dated: 08 June 2021

Subject: Signalling transparency in the TC String for vendors who have registered only for Special Purpose(s)

Dear TCF Vendors and CMPs,

The TCF Steering Group recently agreed that it was necessary to ensure that vendors who had only registered for Special Purposes were correctly signalled in the TC String.

As reminder Special Purposes means one of the defined purposes for processing of data, including users’ personal data, by participants in the Framework that are defined in the Policies or the Specifications for which Vendors declare a legitimate interest Legal Basis in the GVL and for which the user is not given choice by a CMP including the “Right To Object”.

The Vendor Legitimate Interest section in the TC String encodes one legitimate interest bit for each Vendor ID. The CMP sets the bit corresponding to a given vendor to 1 if the CMP has established transparency for that vendor's legitimate interest disclosures for one or more Purposes (including Special Purposes). If a user exercises their “Right To Object” to a vendor’s processing based on a legitimate interest, then that vendor’s bit must be set to 0.

NEW: For vendors that register for Special Purposes only (and no other Purposes) and have been displayed by the CMP the value must be set to 1. Technical specification update can be found here. The code library that complements the technical specification will be updated in the coming weeks.

NOTE: CMPs are required to accommodate this update no later than 31st August 2021. CMPs will not be required to re-surface the UI to accommodate this update but should note that if they do not then those vendors who have only registered for Special Purposes will continue to receive an ambiguous signal.

Best regards,

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