



IAB Europe DSA Transparency Approach Summary

About this document

This document is intended as the IAB Europe DSA Solution to enable collaboration between partners in fulfilling their roles and obligations under DSA article 26 (and to some extent 39) using the upcoming IAB Europe DSA Transparency Technical Specification version 0.2. The specification as-is can enable DSA ads transparency implementation, though further discussion should happen between partners, and shall also happen within industry solution development groups. As with other industry specifications, this one will evolve as actual implementation in the market reveals needs.

As of October 2023, time is limited for businesses to implement DSA transparency solutions to help Online Platforms comply with DSA. It is imperative that businesses communicate with their partners about their actual requirements, in order to best make use of available industry solution approaches.

This document describes the IAB Europe DSA Transparency solution design approach to be used as a key part of complying with DSA ads transparency requirements. IAB Europe's solution supports flexibility in the rendering of DSA transparency to end users. We strongly recommend partners confirm requirements, and reach out to this taskforce if any of these industry solution features are critical for your development.

The Summary Document explains how the protocol works, and in many areas, the reasons why it is designed as it is. It provides enough information for companies to begin implementation. In our view, the bulk of the work of implementation falls into two areas:

- For relevant intermediaries: internal product work to gather the required information and prepare it, and working with buyer partners to acquire the required advertiser information
- For Platforms: determining whether they will make their own disclosures or delegate to intermediaries, and designing their disclosures if the former
- For all together: communicating among partners to coordinate implementation

These tasks can be started while awaiting the final technical specification. IAB Tech Lab will now steward the draft specification in order to undergo Tech Lab's Working Group processes to update and finalise.

About IAB Europe

IAB Europe is the leading European-level industry association for the digital advertising ecosystem. Its mission is to promote the development of this innovative sector and ensure its sustainability by shaping the regulatory environment, demonstrating the value digital advertising brings to Europe's economy, to consumers and to the market, and developing and facilitating the uptake of harmonised business practices that take account of changing user expectations and enable digital brand advertising to scale in Europe.



Learn more about IAB Europe here: iabeurope.eu

About IAB Europe's DSA Taskforce

IAB Europe's DSA Taskforce launched in July 2022. The group was convened to evaluate industry needs for standardisation in support of compliance with ads transparency requirements stemming from Article 26 of the EU's [Digital Services Act \(DSA\)](#), with an initial focus on Art. 26. The taskforce includes technical and legal/policy experts from companies ranging across the advertising ecosystem. This document is a product of the DSA Taskforce.

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DSA Background

The Digital Services Act (DSA) was adopted in October 2022, and the date of applicability for Platform companies is [16 February 2024](#). Along with the [Digital Markets Act \(DMA\)](#), the DSA is intended to improve the confidence of both private consumers and business users of Online Platforms. It will also improve confidence in the products and services they access via those platforms, as well as the advertising they are exposed to on them, and to ensure a level playing field between platforms. The DSA is a large and complex piece of legislation. The focus of our work has been the transparency obligations in relation to advertising that apply to Online Platforms (Art. 26), and to some extent, “very large online platforms”, or VLOPs (Art. 39).

The challenge for industry is that in many scenarios of programmatic advertising, the information that is required to be disclosed to users by Platforms is in the hands of one or more intermediaries. The IAB Europe DSA Transparency Taskforce anchors the solution approach on interoperability and communication between partners by defining a supplement to existing industry information exchange mechanisms. OpenRTB is the prime example of where the approach may be used, but it is adaptable to many scenarios.

Article 26 DSA requires Online Platforms to ensure that users have real-time access to certain elements of information about any ad shown to them on an Online Platform:

- That the ad is indeed an ad;
- The identity of the advertiser;
- The identity of the party that financed the ad, if it is different from the advertiser;
- Information about the “main parameters” used to determine the recipient of the ad;
- Where applicable, information about how a user might change those main parameters; a user-facing component, and outside the scope of IAB Europe’s DSA Transparency Solution.

SECTION 1: IAB Europe DSA Transparency Solution Approach

Although the legal obligation to provide the user-facing information disclosures applies to Online Platforms/VLOPs, it is clear that in many advertising scenarios, those platforms will need to rely on third-party vendors for the data that will be required to populate the disclosures. To ensure that the third parties are equipped to provide this support, the IAB Europe Solution Approach is to standardise the collection, compilation and transport of the data, leaving Online Platforms free to decide how they wish to make the user-facing disclosures, including if they want to delegate the disclosures to another party.

The solution approach specifies data formats and transport for the advertising industry to implement relevant DSA transparency information. This solution should be adaptable across most relevant use cases including; programmatic and non-programmatic media buys,



channels including desktop web, mobile (web/app), video, audio, CTV. For example, new OpenRTB fields can be applied in direct integrations.

IAB Europe DSA Transparency Solution Principles;

- Delivering DSA Transparency to consumers requires the cooperation of the supply chain vendors to a) support flexibility of rendering and b) identify user-targeting-parameters.
- Support Online Platform/VLOP preferences for flexibility of rendering DSA Transparency to end users; e.g. in-ad, or on-webpage.
- Support programmatic and non programmatic rendering through helpful signals to orchestrate DSA transparency.
- Consistency of availability of DSA Transparency information.
- Capacity to provide utility in a wide variety of use cases and channels.

Where partners determine that it is necessary to provide DSA Transparency information, the following format may be used for DSA transparency information;

Data Format: DSA Ad Transparency

The following data format can be used in programmatic use cases (e.g. in OpenRTB bid response) and could be used in non-programmatic use cases.

Component	Expected Values	Definition
“behalf”	String	Advertiser Transparency: on whose behalf the ad is displayed Free UNICODE text string with a name of whose behalf the ad is shown Maximum 100 characters.
“paid”	String	Advertiser Transparency: who paid for the ad Free text string of who paid for the ad Maximum 100 characters.

Data Format: DSA User Parameters

The following data format can be used in programmatic use cases (e.g. in OpenRTB bid response) and could be used in non-programmatic use cases.

Component	Expected Values	Definition
"userparameters"	Array	<p>User parameters: <i>meaningful information about the main parameters used to determine the recipient to whom the advertisement is displayed.</i></p> <p>The IAB Europe DSA Transparency Taskforce employs alignment between user parameters and existing taxonomies. Specifically, the Transparency and Consent Framework Purposes could be used to strengthen the efficacy of transparency and control.</p> <p><u>See the following table for the list of fields with binary indicators if used or not.</u> Note that an indication of use satisfies the spec – No additional detailed parameters should be added here.</p>

List and Definitions of User Parameters:

These are a list of binary indicators of whether the describe parameter was used. See discussion below regarding the rationale for this approach, and possible future direction.

List of Values for User Parameter Field	Definition of the User Parameter	Associated TCF Purpose IDs*
Profiling	<p>Information about the user, collected and used across contexts, that is about the user's activity, interests, demographic information, or other characteristics.</p> <p>Indication that "profiling" was used or not satisfies this field value. This field should not contain any other values or details of profiling, for example should not include specific segment taxonomies or audience types.</p>	TCF Purposes 3 & 4

Basic advertising	<p>Use of real-time information about the context in which the ad will be shown, to show the ad, including information about the content and the device, such as: device type and capabilities, user agent, URL, IP address, non-precise geolocation data. Additionally, use of basic cross-context information not based on user behaviour or user characteristics, for uses such as frequency capping, sequencing, brand safety, anti-fraud.</p> <p>Indication that “Basic Advertising” was used or not satisfies this field value. This field should not contain any other values.</p>	TCF Purpose 2
Precise geolocation	<p>The precise geolocation of the user, i.e. GPS coordinates within 500 metre precision.</p> <p>Indication that “Precise Geolocation” was used or not satisfies this field value. This field should not contain any other values.</p>	TCF Special Feature 1

**The specification is not integrated directly with TCF, however it is aligned. Because Art. 26 requires users to be informed of how they can change parameters, aligning with TCF purposes has advantages in terms of clarity to users and consistency of the user experience in relation to ads.*

SECTION 2: Implementation Questions and Recommendations

This section illustrates IAB Europe DSA Taskforce product requirements and solution approach. This document itself is not a technical specification.

RTB orchestration of DSA transparency delivery

A variety of potential scenarios is contemplated:

Primary (legal) responsibility for delivering disclosures lies with the Platform. However, IAB Europe’s approach includes flexibility to suit various scenarios and preferences among companies participating in the ad supply chain, including though not limited to the following:

1. FULL CONTROL SCENARIO: Online Platforms need to ask their publisher ad server and RTB partners to facilitate sending all DSA Transparency information so that the Online Platform can compile the information and deliver it on their own content in a manner that satisfies the Platform’s needs.

2. PLATFORM RENDERING WITH BUY-SIDE USER EXPERIENCE: An Online Platform publisher could provide a URL, or the industry could standardise on a well known location, so as to enable a link from within the creative to a web experience owned by the publisher and filled in with the appropriate DSA transparency information.
3. COMBINATION: Both Online Platform and buy-side intermediary provide disclosures, either both with consolidated information or different information (parameters) in each. For example, buy-side discloses who paid and parameters used on the buy-side, while the Platform discloses parameters it used or contributed for selecting the ad and how users can change parameters.

Each of the above scenarios can be facilitated using the IAB Europe specification.

Call to action: Online Platforms should discuss with partners what their requirements are for rendering DSA transparency, and provide any feedback to IAB Europe that might be helpful for the further development of this standard. .

How does an intermediary know when DSA applies to an impression, and therefore DSA transparency needs to be provided?

Requirement: Online Platform/VLOPs want to signal when they expect intermediaries to provide DSA Transparency information on any given bid request.

Solution Approach: Online Platform/VLOP sell side partners use an OpenRTB Bid request flag to indicate if DSA applies to the bid request. This will signal if the bid request belongs to an Online Platform/VLOP, such that a buyer should respond with DSA Transparency information.. For example within the bid request;

Regs .ext .dsaapply; where an integer value 0 = No, 1 = Yes. If the signal is not present, a value of 0 (does not apply) is assumed.

In case rendering of the disclosure is delegated to an RTB intermediary, can a Platform receive confirmation?

Requirement: Online Platform/VLOPs will want confirmation that the DSA Transparency was indeed rendered by the intermediar(y)(ies).

Solution Approach: These partners should use a flag to confirm that they will be responsible for delivering DSA transparency to the end user. In OpenRTB, a bid response flag (for example, Seatbid.bid.ext.dsarenderconfirmation) can

signal DSA Ad Transparency rendering confirmation, with an integer value 0 = No, 1 = Yes.

Can the Platform delegate rendering of the disclosure to the buy-side?

Requirement: Although Online Platforms hold primary responsibility for delivering Art. 26 disclosures, a Platform may want to indicate the (or certain) disclosures that the buy-side is in the position to render, while other disclosures should remain with the platform. This could be in lieu of or in addition to the Platform's rendering.

Solution Approach: In order to coordinate, partners could use an OpenRTB flag. Partners would need to indicate in advance about the expected action resulting from the flag value. An OpenRTB Flag for the Online Platform to indicate if the Platform desires the buy-side to render the DSA Transparency info. For example, Regs .ext .adrender An integer value 0 or Null = (only) Platform renders (default), 1 = Buy-side renders. Whoever purchases the ad, probably the DSP would be the party rendering. This must be coordinated among partners in advance. In a case where the Platform would like to render DSA Transparency AND where the Platform would like the Buy-side to render, then the value of 1 should be used.

Can the Platform proactively request DSA transparency information in the bidstream?

Requirement: In some cases, Online Platform/VLOPs may want the DSA Transparency information available to them.

Solution Approach: If, by whatever arrangement, the buy-side is to render the disclosures, the Online Platform may proactively request to receive the DSA transparency information sent in the bidstream. The following data format could be used in OpenRTB.

Proposed solution;

OpenRTB 2.1-2.6 Bid Response support for DSA transparency including:

1. DSA Ad Transparency strings, including a string for "behalf" and "paid" as defined further below.

Seatbid.bid.ext.transparency.behalf
Seatbid.bid.ext.transparency.paid

2. Array of buy-side applied user parameter targeting (using [the list provided by DSA Transparency Taskforce](#)). Include support for multiple vendors who may add their own user-targeting parameters.

`Seatbid.bid.ext.transparency.userparameters`

If the buy-side is to render the Art. 26 disclosures, the sell-side (Platform, SSP, etc.) may have contributed parameters to ad selection that need to be included in the disclosures; How can these be transmitted?

Requirement: Online Platform/VLOPs and their partners need to communicate if any sell-side user targeting parameters were also applied to the delivery of an ad.

Solution Approach: The Online Platform or tech partner, e.g. SSP can add the parameters on the bid request for receipt by the buy-side, to be compiled into the disclosures. For example, using an OpenRTB field

User `.ext.usertransparency`. Array for platform or sell-side use of any user parameters (using [this list provided by DSA Transparency Taskforce](#)). *Note; See definition and list of possible [userparameters as listed here](#), applied consistently in both bid request and/or bid response.*

Can a Platform filter ads or buyers that don't provide DSA transparency? How can I make that happen?

Requirement: Some Online Platform/VLOPs may want to disallow ads to be delivered if they will not support rendering DSA Transparency to the end user.

Solution Approach: Because the IAB Europe DSA Transparency solution allows for signalling in RTB bid stream, the Platform/VLOP partners (eg ad server or SSPs with access to bidstream) can review the status of the OpenRTB flag (for example, `Seatbid.bid.ext.dsarenderconfirmation`) and reject and bid responses that will not be rendering DSA Transparency. This should require coordination amongst partners to mitigate any ad campaign delivery expectations.

Can the DSA Transparency Solution Approach work in other environments beyond RTB?



Requirement: The IAB Europe DSA Transparency solution should be adaptable across most relevant use cases including; programmatic and non-programmatic media buys, channels including desktop web, mobile (web/app), video, audio, CTV.

Solution Approach: Yes, the user parameters listed here could be communicated between direct partners in non-programmatic deals. For example, using a VAST protocol extension, or applying any new OpenRTB fields into direct integrations between partners for non-programmatic media buys. Particularly, the user parameters (using [this list provided by DSA Transparency Taskforce](#)) can be applied for DSA Transparency in non-programmatic media.

As a Demand-side partner or advertiser, do I need URL-Based support or Macros to facilitate sharing DSA Transparency information to render appropriately?

Requirement: Some ad systems may rely on the use of URLs and macro substitutions to communicate information. Macros can be used to carry relevant DSA information. Macros can be used; 1) To support ad/demand side rendering (DSP to Ad). 2) To support URL-based advertising delivery.

Solution Approach: Support url-based integrations. IAB Tech Lab has been requested to complete the technical specifications required to support macro implementation.

For example, A DSP can collect the DSA Transparency information from OpenRTB, use a macro to forward the information to their ad serving partners, or to an icon provider to ultimately render DSA Transparency information to the end user.

Some ad systems may rely on the use of URLs and macro substitutions to communicate information. The following macros can be used to carry relevant DSA information. See implementation guidelines for some example uses of these macros.

These macros can be used;

1. To support ad/demand side rendering (DSP to Ad)
2. To support URL-based advertising delivery.

URL parameter	Definition
<i>behalf</i>	<i>Populated from the DSP bid response</i>
<i>paid</i>	<i>Populated from the DSP bid response</i>

<i>userparameters</i>	<i>Populated based on the combination of array information from the bid request and bid response user parameters. Lists contents from this table of user-targeting parameters. No further detail required.</i>
<i>pubrender</i>	<i>Populated based on the value of the platform rendering flag if present in the bid request.</i>
<i>creativerender</i>	<i>Populated based on the value of the DSP rendering flag if present in the bid request.</i>

Who must include parameters and what exactly must be disclosed?

Parties in the ad delivery chain, who used any of the parameters should indicate so, and who have access to the DSA data object should contribute information about their use of parameters. Whether or not a company has contributed parameters that must be included is a business-specific legal/policy question that is outside the scope of the specification.

For companies that do contribute to the disclosures, the spec expects merely a binary indication of whether a parameter category was used for selecting the ad. It is not intended that companies will add detailed lists of user characteristics or other detailed information about the parameters used.

There are reasons for this, including but not limited to the mess and complexity of communicating all of the thousands, even millions of, types and terms for describing targeting methods, and the privacy and commercial concerns with communicating such information in the supply chain. Therefore, this approach uses a broad and straightforward set of three parameters that directly correlate with meaningful user privacy controls (e.g. TCF).

In the future we will likely want or need to increase the granularity of information provided to users to describe parameters that were used in ad targeting. In that future iteration, we expect the most feasible and meaningful direction will be to increase information available about the nature of the data used – such as types of identifiers, general sources of data, and so on – rather than actual user characteristics.

Rendering of DSA transparency information

The specification does not yet define any aspects of rendering. However, implementers might consider the guidance below. As companies start to implement and issues arise, IAB Europe can look for opportunities to standardise or provide additional guidance.

How should parameters be disclosed to users?

The disclosing party has discretion to translate the specification-defined parameters into language best suited to the context, in terms of language, tone, and format. Of course, disclosures should accurately reflect the meaning as defined in the specification, and legal counsel should be consulted to ensure compliance.

What exactly should be disclosed with respect to who is the advertiser and who paid for the ad?

As with the parameters, the disclosing party has discretion to translate the information into language best suited to the context, in terms of language, tone, and format. In the case of identifying parties responsible for the advertising, our understanding, though you should confirm with your own counsel, is that these fields should not include intermediaries or agencies, but rather the advertisers or other parties ultimately responsible for the ad or on whose behalf the ad has been placed.

There may be issues related to exactly how to name the advertiser in the disclosure. For example, should one disclose the (local) brand that is advertised in the ad, or the global conglomerate that owns the brand? The latter may not be recognisable to the user, whereas the brand would be. A further consideration is that a brand might be operated by different legal entities in different countries. These and other issues await legal interpretation. Whether or not industry standardisation in this area will be helpful is yet to be seen.

In the meantime, parties should use their judgement after consultation with partners and legal counsel.

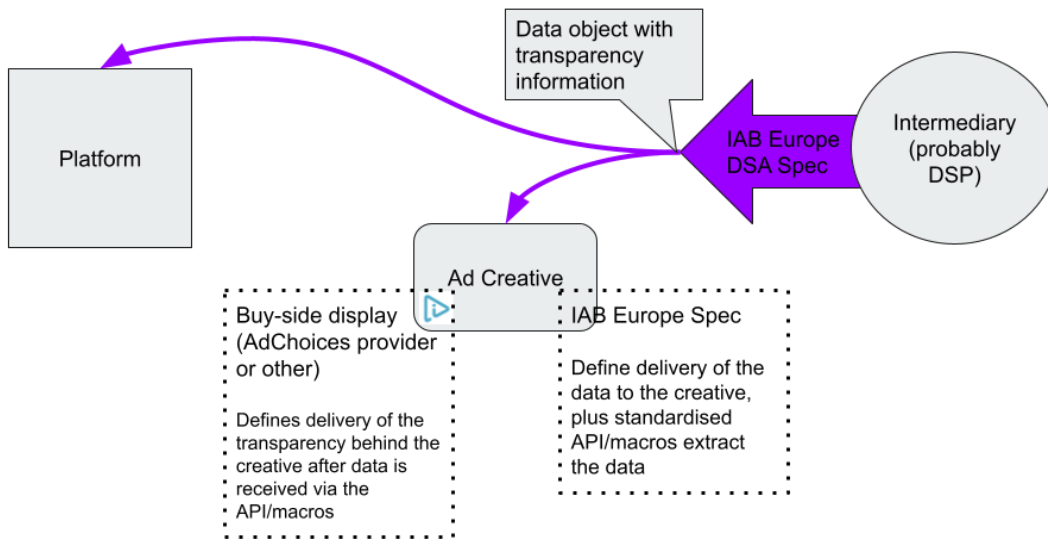
How might rendering work across business partners?

The following diagram represents one possible scenario whereby the Online Platform requests that DSA Transparency information is rendered in-ad. The Online Platform will need cooperation of supply chain partners. The supply chain partner can use specified macros in order to forward the per-ad DSA transparency information to ad delivery partners, for example, proprietary ad servers, or an EDAA icon provider service to ultimately render

DSA Transparency to the end user on behalf of the Online Platform.

**An Example of In-Ad DSA Transparency Rendering:
IAB Europe-EDAA DSA Complementarity**

** Diagram indicates one possible example scenario, not representative of policy for DSA Transparency. Implementers of the IAB Europe solution could render DSA Transparency information in a variety of ways, e.g. proprietary, use of EDAA icon, or otherwise.*



Note also that this reflects the common case of programmatic display advertising. Our solution is adaptable to many other scenarios, including audio/video players, direct buy, publisher-controller rendering, CMP-provided rendering, and so on.

SECTION 3: Future Considerations for DSA Transparency and Data Privacy/Protection

The transparency for DSA purposes that is delivered to end users through Platforms/VLOPs complements other IAB Europe and industry programs. The following ideas are intended to provoke future iterations of DSA transparency and interplay with existing programs, but are not minimum viable product requirements, and certainly not expected for industry adoption by January 2024. Document readers should consider the following opportunities as conversation starters with partners and to design good foundations as the DSA Transparency Solution launches.

- Consent Management Platform (CMP) Capability and consumer transparency
 - Platform/VLOPs who use a CMP may want to leverage the CMP framework that already exists for consumer transparency to additionally display DSA Transparency for ads delivered on the webpage. Currently the IAB Europe DSA Transparency solution provides information to SSPs, additional

standardisation might be needed if businesses desire this functionality. The IAB Europe DSA Taskforce encourages Platform/VLOP publishers and CMP providers to work directly together to determine opportunities and requirements.

- DSA Transparency and Transparency and Consent Framework (TCF v2.2) alignment
 - The design of the IAB Europe DSA Transparency Solution enables vendors to declare which user targeting parameters were applied to deliver an ad, referencing the Data Purposes of the TCF. This gives a real time report of what a vendor actually DID during an ad transaction, and can enable the Verification of what the vendor SHOULD do during an ad transaction according to the consumer's privacy preferences. Art. 26 of DSA requires users to be informed of how they can change parameters, aligning with TCF purposes has advantages in terms of clarity to users and consistency of the user experience in relation to ads.
 - This potential future opportunity has not been fully explored, and the taskforce looks forward to further conversation with IAB TCF experts.

- Describing parameters
 - Currently, the IAB Europe DSA Transparency solution provides 3 high level user targeting parameters that align to the existing [TCF v2.2 Data Purposes](#). We intentionally selected three meaningful user targeting parameters to meet the needs of partners and end user transparency.
 - The IAB Europe DSA Taskforce specifically did not create a new taxonomy to describe targeting. Our parameter categories are straightforward, high-level, and aligned to choices that users have available. We do expect that more expansive categories and descriptions will be required, but this was a feasible place to start and build upon. In our view, taxonomies that describe user interests or characteristics are not suited for this purpose, and a more feasible and meaningful approach would be to focus on sources and nature of the data used for targeting.

- Publisher recourse through DemandChain/buyers.json
 - As Platforms and VLOPs may need a method to validate who is sending transparency information through the supply chain, we can look to the IAB Tech Lab Demand Chain and buyers.json specifications for additional transparency.

- Other opportunities may exist.