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# DSA Transparency Implementation Guidelines

Provided by IAB Europe's DSA Ads Transparency Taskforce

### Version History and Changelog

- Version 1 published 2024 January 15 – Initial Implementation Guidelines
- Version 1.1 published 2025 May 5 – Addition of DCO for ad creative rendering and new FAQ to avoid double rendering of the DSA information, reference to VAST icon support.

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# About IAB Europe

IAB Europe is the 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 helping shape the policy and regulatory environment, facilitating legal compliance, demonstrating the value digital advertising brings to Europe's economy, to consumers, and to the market, and developing and facilitating the uptake of standards and best practice that take account of changing user expectations and enable digital 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 the EU's Digital Services Act (DSA), with an initial focus on Art. 26. The task force includes technical and legal/policy experts from companies ranging across the advertising ecosystem. This document is a product of the DSA Taskforce.

## About IAB Tech Lab

The IAB Technology Laboratory is a nonprofit research and development consortium charged with producing and helping companies implement global industry technical standards and solutions. The goal of the Tech Lab is to reduce friction associated with the digital advertising and marketing supply chain while contributing to the safe growth of an industry. The IAB Tech Lab spearheads the development of technical standards, creates and maintains a code library to assist in rapid, cost-effective implementation of IAB standards, and establishes a test platform for companies to evaluate the compatibility of their technology solutions with IAB standards, which for 18 years have been the foundation for interoperability and profitable growth in the digital advertising supply chain.

Learn more about IAB Tech Lab here: iabtechlab.com

## About IAB Tech Lab's DSA Transparency Extension and Technical Specifications

The technical specifications to support DSA Transparency were developed in partnership with IAB Tech Lab's Global Privacy Working Group, which stewards these Technical Specifications.

IAB Tech Lab's Global Privacy Working Group is responsible for the development and maintenance of the DSA Transparency technical specifications referenced within this

implementation guideline. The objective of the Global Privacy Working Group is to develop guidelines, standards, and tools to facilitate uniform encoding, communication, and decoding of consumer privacy preference signals throughout the digital supply chain.

IAB Tech Lab's technical specifications for DSA transparency are available here as an extension to the OpenRTB protocol. OpenRTB extension: DSA Transparency

IAB Europe and IAB Tech Lab will continue their partnership to steward this solution. IAB Tech Lab will maintain the technical specifications. IAB Europe will provide policy guidance, such as these implementation guidelines.

# Definitions within this Document

The term "Platform" is used throughout this document to refer to publishers who are classified as "online platforms" under the EU's Digital Services Act (DSA). For the purposes of this document, it shall also refer to Very Large Online Platforms (VLOPs), which constitute a sub-category of "online platforms".

The DSA introduces the following definitions:

- "Online platforms": "A hosting service that, at the request of a recipient of the service, stores and disseminates information to the public, unless that activity is a minor and purely ancillary feature of another service or a minor functionality of the principal service and, for objective and technical reasons, cannot be used without that other service, and the integration of the feature or functionality into the other service is not a means to circumvent the applicability of this Regulation".

- "VLOPs": Online platforms "which have a number of average monthly active recipients of the service in the Union equal to or higher than 45 million".

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# Summary

The DSA was adopted in October 2022, and the date of applicability for Platform companies ("online platforms" in the language of the Regulation) 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 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 lays down transparency obligations in relation to advertising that overlap with, but also go beyond, what is already required by the General Data Protection Regulation (GDPR); these obligations apply to online platforms and "very large online platforms" (VLOPs).

Article 26 DSA[1] requires online platforms to ensure that users have real-time access to certain elements of information, *per advertisement*, about each ad shown to them on the platform. These elements of information are:

- 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 any means users may have at their disposal to change those main parameters.

Although the legal obligation to provide user-facing information disclosures applies to online platforms, 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, IAB Tech Lab and the IAB Europe Taskforce have standardised 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 making of the disclosures to another party.

The technical specification, hosted by IAB Tech Lab here, provides data formats and a mechanism for the transport of the data that are required to enable 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, and for channels including desktop web, mobile (web/app), video, and CTV.

The scope of the spec *excludes* functionality required by Article 39 DSA, which requires VLOPs and VLOSEs to maintain repositories of ads shown to users on their services and records of the transparency information required by Article 26; this said, the spec could be of use in complying with those requirements.

[1] The full, verbatim text of Article 26 may be consulted here.

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# Resources to be used with the IAB Tech Lab DSA Transparency extension

## List and Definitions of User Parameters

These are a list of binary indicators of whether the described parameter was used. See the discussion below regarding the rationale for this approach.

| List of Values for User Parameter Field | Definition of the User Parameter | Associated TCF Purpose IDs* |
|---|---|---|
| **Profiling** | Information about the user collected and used across contexts, that is about the user's activity, interests, demographic information, or other characteristics.<br><br>The 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 it should not include specific segment taxonomies or audience types. | TCF Purpose 4 |
| **Basic advertising** | 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, and non-precise geolocation data. Additionally, the use of basic cross-context information not based on user behavior or user characteristics, for uses such as frequency capping, sequencing, brand safety, and anti-fraud.<br><br>The indication that “Basic Advertising” was used or not satisfies this field value. This field should not contain any other values. | TCF Purpose 2 |
| **Precise geolocation** | The precise geolocation of the user, i.e. GPS coordinates within 500 meter precision.<br><br>The indication that “Precise Geolocation” was used or not satisfies this field value. This field should not contain any other values. | TCF Special Feature 1 |

**The IAB Tech Lab specification is not integrated directly with IAB Europe's TCF, however, these main parameters have been designated based on TCF Purposes so that TCF could be used for the exercise of user control over those parameters. As noted above, Art. 26 requires users to be informed of any means at their disposal to change the main parameters. Aligning the main parameters used in the DSA user-facing disclosures with data processing purposes used in the TCF has the important advantage of using a mechanism that is already widely installed (TCF) to enable user choice about main parameters and overall consistency of the user experience in relation to ads. For the avoidance of doubt, the party rendering the DSA information may choose to present additional or more granular parameters to end-users.*

# Implementation Guidelines

These guidelines reflect a limited number of "policy" choices made by the DSA Taskforce. As regulator guidance around compliance with the DSA Regulation evolves, additional policy issues may be addressed within the DSA task force. These guidelines indicate our expected best practices for the use of the technical specification, once finalised.

## Roles and responsibilities

Assumptions:

1. Advertiser (or agency) has the behalf/paid info associated with an ad creative.
2. ANY party (DSP, SSP, etc) could potentially be applying user parameter information.
3. Platforms, including VLOPs, have the legal obligation under the DSA Regulation to display information to end users.

# Expected Roles to support DSA Transparency

The OpenRTB DSA Transparency extension is intended to support a wide range of use cases. Depending on the use case, different actors will perform various roles. In any case, the intention is that the online platforms that are the object of the legal requirements will have various ways of ensuring their obligation is fulfilled.

| **Business Type** | **Top Level Requirements** |
|---|---|
| Online Platforms and VLOPs | ● Display DSA ad transparency and user targeting parameters applied.<br>● Support rendering the transparency information, by building tech or relying on tech partners.<br>● Contribute to DSA transparency of user targeting parameters if any sell-side pre-targeting was applied.<br>● If applicable, point users to a mechanism for choice about the main parameters, for example, a TCF CMP installed on the site or app.<br>● Option to support online platforms that want to block ads without ads that do not carry DSA transparency info. |
| Platform/VLOP tech partners | ● Publisher ad servers may need to support Platforms/VLOPs to render DSA transparency info.<br>● Video/audio players may need to support rendering DSA transparency info. |
| CMPs | ● Optional: Support Platforms/VLOPs who want their CMPs to render DSA Transparency to users. (No standardized technology yet.)The above specification transmits information for disclosure to end users.<br>● By default, we refer to the TCF as the means for users to execute choice/control. |
| SSPs | ● Support new RTB DSA Transparency fields.<br>● Optional: Contribute to user targeting parameters if sell-side targeting was applied.<br>● Option to support Platforms that want to block ads without DSA transparency info. |
| DSPs | ● Support new RTB DSA Transparency fields. Initiate the DSA transparency object, unless initiated by another party.<br>● Provide DSA transparency information, including “behalf” and “paid” passed from the advertiser/agency to the supply chain.<br>● Contribute to user targeting parameters, as applicable.<br>● Support sending fields to creative for rendering DSA Ad Transparency information in-ad. (e.g. Could facilitate rendering DSA Transparency information [using a?] proprietary method OR use EDAA’s AATP). |

| | |
|---|---|
| Agency/Advertiser | ● As determined by and with DSP or another intermediary, must identify and provide legal entity names for “behalf” and “paid” |

## Detailed notes for Implementers

All RTB Parties:

- Support new RTB fields.
- Contribute to User Targeting parameters as applicable.
- Do not change advertiser behalf or paid fields.
- Online platform/publisher should inform the SSP about how to set the initial DSA Transparency bid request fields including “dsarequired,” “pubrender,” and “datatopub”. These signals must represent the Online Platform’s requirements to downstream partners. For example, to indicate that the Online Platform will only accept bids with DSA transparency functionality, the Online Platform can indicate within the field “dsarequired” a value of “3=Required… Publisher is an Online Platform.”
    - Definitions of these fields are described in the technical specification here.

Online Platform (Publisher) implementation notes

- Will contribute to DSA User parameters as applicable.
- Display of DSA ad transparency info, including user parameters. The rendering and UI displayed to consumers is to the platform's discretion.
- Translations to various languages for platforms.
    - The DSA Transparency User parameters list is provided by IAB Europe within these implementation guidelines. The list aligns with TCF Purposes, such that the descriptions of these purposes could be used to communicate with consumers.
    - The selection of language, all other descriptions, and display information is provided by the platform. TCF Purpose translations are available within TCF resources, as needed to communicate with consumers.
- Flexibility for rendering
    - Pub-rendered: Publishers can choose to take information from their SSP and display it to the end user in a custom or proprietary manner.
    - Ad-rendered: DSP partners can facilitate rendering DSA Transparency information to the end user either a) through a proprietary manner or b) through EDAA’s AATP (Advanced Advertising Transparency Programme).

Agency/Advertiser implementation notes

- As determined by and with DSP or other intermediary
- Must identify and provide legal entity names for “behalf” and “paid”

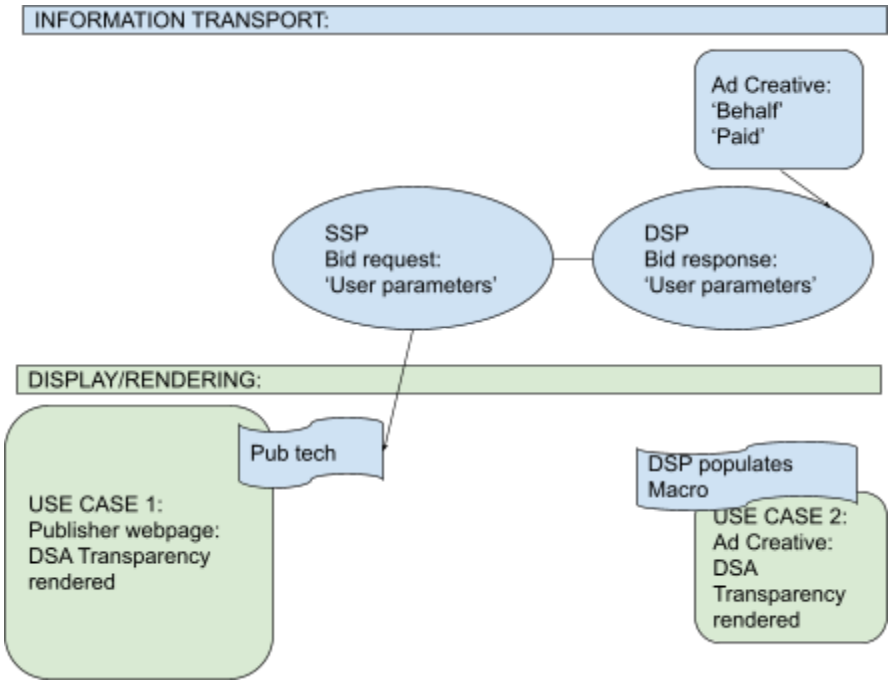
## Providing control/choice

DSA requires providing information about how to change parameters as applicable, and where functionality to deliver such change is in place on the site or app. Control/choice will be offered through a separate mechanism, is not detailed here but currently is the object of further work within IAB Europe and Tech Lab instances. As noted above, alignment of the DSA "main parameters" with the TCF data processing purposes opens up the possibility of user-facing DSA disclosures pointing to the TCF for the exercise of user choice about those parameters.

More information about TCF: https://iabeurope.eu/transparency-consent-framework/

# Rendering Use Cases (Parallel transport pathways to support either)

The OpenRTB DSA Transparency extension supports two pathways of transporting DSA transparency information – this will continue to support either a platform OR the ad creative rendering the DSA transparency information (i.e., 'behalf,' 'paid,' and 'user parameters'). "Parallel pathways" refers to using ad creative AND OpenRTB as technical transport pathways.



## Use case 1 – Platform (Publisher) Rendering

1. **AGENCY**: The agency should provide their ad tech provider with the information for the fields ‘behalf’ and ‘paid’ associated with ad creative.
    a. Agency awareness of this requirement for additional campaign info.
    b. Creative ad servers & intermediary parties will need to build out support to accept and forward this information!
2. **DSP** must access these fields and make these available in the bid response DSA transparency info. In a direct buy – the platform (or other tech layer) would need to access these fields from the data associated with the creative to populate the DSA transparency info.
    a. Product: The agency needs to be aware of this requirement, e.g. to input info into a campaign in DSP UI (which also needs to be created by the DSP).
    b. Practice: The agency determines what is populated in the “behalf” and “paid” fields... for example, DSP UIs can help agencies understand what to declare for who paid for the ad. DSP/Agency communication is needed to determine what type of info should be provided in these fields.
    c. DSPs should filter creatives such that only ads with DSA transparency information can serve where DSA transparency is applied.
3. Optional; Bid request will contain sell-side applied user parameters info.
    a. SSP would know if any seller targeting info is applied.
4. Required: Bid request must indicate these fields; “dsarequired”, “pubrender”, and “datatopub”.
5. **DSP**’s Bid response will contain the aforementioned DSA transparency behalf/paid (from ad creative/campaign input), and any user parameters that the DSP applies.
    a. Ad creative server post-bid targeting cannot be communicated through the supply chain and isn’t available to be rendered on pub-rendering use case.
6. Supply-side techs, such as a publisher AdServer or SSP can collect ‘behalf’, ‘paid,’ and ‘user parameters’ (from the sell-side and the buy-side) to make these available to the publisher. Note: any partners who want to implement in this manner, are free to do so in a proprietary manner as suits the partners.
7. Example proprietary technical function (not industry standardized): Platforms (or platform tech partners) could pull this information from a webpage API call to then render on the platform side (e.g. through text under a creative, or click out to CMP webpage, etc…)

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## Use case 2 – Ad Creative Rendering

1. **AGENCY**: In campaign setup, ad creative should be associated with the DSA Transparency fields ‘behalf’ and ‘paid’.
    a. DSPs - encourage Agency awareness of this requirement for additional campaign info.
2. **DSP** must access these fields and make available the DSA transparency info in bid response.
    a. The agency will determine what is populated in the “behalf” and “paid” fields. DSP/Agency communication is needed. For example, DSP UIs can help agencies understand what to declare for who paid for the ad.
    b. DSPs could filter creatives such that only ads that have DSA transparency information can serve where the Online Platform requests DSA transparency.
3. **DSP** will collect the user parameters used for targeting as stated in RTB (including bid request user parameters and bid response user parameters used).
4. **DSP** will supply ‘user parameter’ information to the ad creative.
    a. As needed to facilitate, IAB Tech Lab has standardized macros to transport DSA transparency information.
5. Ad creative will render DSA transparency info, including real-time ‘user parameters’. (e.g. through dynamic creative populating text or the use of an icon linking to a new webpage or EDAA AATP, etc…). The DSA Transparency information will appear relative to each ad on the page.

## Use case 3 – Ad Rendering using DCO

1. **PUBLISHER** sends the bid request to SSP indicating that DSA information is required and specifying whether they can or should render.
2. **SSP** sends bid requests to DSPs**.**
    - **(2a)** SSP may apply pre-targeting. Any applied targeting parameters should be included in ext.dsa.transparency and forwarded to the DSP.
3. **DSP** applies targeting logic and sends back an ad response to the SSP. The response should include:
    - Their targeting parameters in seatbid.bid.ext.dsa.transparency. The transparency object should include previously communicated information by the SSP.
    - If a DCO creative is included, the DSP must set adrender:1.
4. **SSP** selects the winning bid from the available bids and sends the bid response to the publisher.
5. **Creative content is requested from the DCO ad server via tag URLs (GET request).**
    - The creative URL must include macros for &dsarequired=${DSAREQUIRED} and &dsatransparency=${DSATRANSPARENCY} to carry targeting data and indicate whether DCO provider should render DSA info.
6. **DCO ad server** processes the request and selects the final ad for display.
    - The DCO ad server should append additional parameters to the DSATRANSPARENCY object, ensuring the BEHALF and PAID values are accurately reflected.
7. **The ad is rendered on the client side.**
    - Since the DCO provider has full knowledge of the final creative and its targeting parameters, they should render the DSA logo and information directly.

**Note: Resolving Publisher vs Advertiser Rendering Conflicts**
As there is no direct communication between the publisher and the DCO ad server in *Step 7* and paid/behalf/transparency information can change outside of the bid stream, the adrender:1 signal should take precedence over pubrender:1. This ensures that the party with complete knowledge of the final creative (i.e., the advertiser via the DCO ad server) is responsible for rendering DSA information. If the publisher indicates that they will/must render, DSPs should avoid bidding with DCO creatives and use fallback creatives instead.

## Specific Use Cases

- **Non-programmatic:** When a Platform owns the publishing content, the distribution, and the ad tech stack, they will have control over how the DSA transparency information is generated and sent. Platforms (or VLOPs) in this case may choose to align their user-facing disclosures to those that are enabled by this standard, e.g. by using the same main parameters and pointing to the TCF CMP UI present on the site or app for user control.
- **Non-programmatic:** In the case of Direct deals, the DSA transparency info (e.g. behalf, paid, targeting parameters) should be communicated between the demand and sell sides, and determined before delivery-time. Also before campaign delivery time, the Online Platform should determine their preferred pathway for rendering this information.
- **In-app**: In-app support may also use OpenRTB or VAST parameters to share DSA transparency information. (Including mobile, CTV, OTT, DOOH, gaming…)
- **Video Players:** In scenarios with video players, we expect the player (not the web platform) to render DSA transparency information. Audio and Video platforms can choose how to display transparency info. The use of OpenRTB or VAST parameters can facilitate getting DSA transparency info from the advertiser to the Online Platform or the rendering of the DSA transparency info on behalf of the Platform[2].

[2] IAB Tech Lab's VAST CTV Addendum 2024 introduces icon support for displaying the DSA transparency information in all versions of VAST. See icon support for privacy here.

# Frequently Asked Questions

- What should the online platform do if no DSA transparency information is provided in the bid response?
    - A Platform may instruct its sell-side partner to reject a bid response or prevent it from winning the auction if the bid response does not contain DSA transparency information or indicate in the “adrender” field that the sell-side partner can render DSA transparency on behalf of the Platform/Publisher.
- What should the online platform and their partners do to avoid double rendering of the DSA information?
    - If the bid request indicates that the publisher will render (pubrender = 2), then the buy-side partners should provide the DSA Ad Transparency information in the bid response for the publisher to render that information. The bid response should also indicate adrender=0. Bid responses that indicate adrender=1 and/or fail to include the DSA Ad Transparency information may be rejected or prevented from winning the auction.
    - If the bid request indicates that the publisher could render (pubrender = 1), and the winning bid indicates the buyer will render (adrender =1) – the publisher should not render in order to avoid double rendering of the DSA information.
- What fields should the Online Platform set up?
    - In the bid request, the “dsarequired”, “pubrender”, and “dsatopub” fields should be informed by the Platform’s needs for how they want to fulfill their DSA obligations.
- How can Online Platforms implement rendering of the DSA Transparency?
    - For any Online Platforms and partners who want to implement in this manner, they are free to do so in a proprietary manner as suits the partners. Today, there is no industry standardization for the technology that might be needed to implement. The IAB Europe DSA Taskforce is aware of the opportunity to standardize, if needed, to help streamline the implementation for publisher rendering at a later date.
- Can I leverage a CMP to display DSA Transparency or offer choice?
    - Online Platforms may work with their CMPs to find custom solutions. The DSA Transparency solution is designed to leverage existing frameworks and ad tech pathways, including CMPs.
    - The IAB Europe DSA Taskforce does not yet define an industry standard pathway for CMPs to render DSA Transparency information.
    - As part of the roadmap for 2025, the DSA Taskforce is considering additional ways to resurface CMPs to enable consumer choice relative to DSA Transparency.

# Sample Internal Questions before set-up

To help implementers get started, here are a few questions you may want to resolve within your business before using the OpenRTB DSA Transparency extension. You may want to work across your policy, product, and business teams to consider your approach.

Sample Internal Questions for Publishers/Platforms

- Does our business qualify as an “Online Platform” under DSA?
- How would we like to render DSA Transparency to our end users?
- What ad tech partners do we need to partner with (if any) to render these disclosures? Or do we want to make proprietary DSA transparency disclosures?
- What signals do we need from OpenRTB or non-programmatic supply chain partners to inform DSA transparency?

Sample Internal Questions for Intermediaries

- What signals do Platforms need from our business?
- How should we update OpenRTB attributes to facilitate Online Platform DSA compliance?
- Are we passing through information from other partners or should we add any user parameter information?
- How should our business support Online Platform needs outside of OpenRTB (e.g. updating direct deals with DSA transparency info)?
- What do partners need from us, if any, to facilitate rendering DSA transparency disclosures to end users?

Sample Internal Questions for Rendering Partners

- Is our business in a position to assist in rendering disclosures to end users to support Online Platform DSA transparency? (e.g. DSP, creative ad server, or icon provider)
- Do Online Platforms expect us to render DSA Transparency? How will we receive signals when we are expected to render? How will we return a signal to confirm we will render?
- How will we get the relevant DSA Transparency information in order to render it to end users?