

**Meeting: TCF Governance Board, Q2**

**Date and Time: Tuesday 19 September 2023 at 12:00 (CET)**

**Venue: Virtual**

**Present:** Christer Ljones (Schibsted Marketing Services) (Chair)

Karsten Rieke (Criteo)	Ben Humphry (Huawei)
Romain Gauthier (Didomi)	Benoit Oberle (Sirdata)
Jaakko Kuivalainen (Sanoma)	Jochem Schlosser (Adform)
Colin O'Malley (Integral Ad Sciences)	Markus Rhul (Publicis Groupe)
Gareth Burkhill-Howarth (WPP)	Jean-Marc Vidal (TF1)
Thomas Peruzzi (Virtual Minds)	

**Apologies:**

Robert Blanck (Axel Springer)  
Arne Steinmetz (RTL Group/AdAlliance)  
Ben Barokas (Sourcepoint)

**Board Observer:**

Leigh Freund (NAI)  
Conor Murray (EGTA)  
Magdalena Bublewicz (IAB Poland)

**In attendance:**

Townsend Feehan (CEO, IAB Europe, Managing Organisation)  
Ninon Vagner (Director Privacy & Compliance, IAB Europe, Managing Organisation)  
Colombe Michaud (Programme Lead, IAB Europe, Managing Organisation)  
Hassan Siddaq (Business Administrator, IAB Europe, Managing Organisation)  
Thomas Mendrina (Chair, TCF Steering Group)

Anne Goodman – Secretariat (IAB Europe)

**Chair**

The meeting was declared quorate.

The Chair opened the meeting welcoming those who had attended in person and those online.

## **Action Items Q2 meeting (status)**

There were 2 action items recorded at the Q2 Board meeting and one pending that is carried over from the Q1 meeting.

**Action:** Secretariat to draft an update to statutes of governance for TCF Governance Board approval to be followed by presentation to IAB Europe Board for final approval

**Action taken:** updated and circulated to the Board prior to Q3 meeting (see Agenda item 8);

**Action:** Secretariat to distribute the TCF Risk Registry (Paper 4) to the Board for further commentary, suggesting that this commentary would be timely in advance of the IAB Europe Board meeting Monday May 22, 2023.

**Action taken:** updated and circulated to the Board prior to IAB Europe Board meeting (no further commentary recorded);

**Action carried over from Q1 meeting:** MO agreed to advance discussion with advertisers to better understand the use case that would detail advertiser requirement of the TCF;

**Pending:** due to MO focus on preparations for launch and implementation of TCF v2.2

**Managing Organisation (MO) update (PAPER 3 09-05-23) for noting** –The CEO of the Managing Organisation, Townsend Feehan, presented highlights from the update from the MO. The update had been circulated to the Board prior to the meeting.

Following the update, the Board raised the following points.

*Meeting with the CNIL on IAB Tech Lab’s Accountability platform (AP)* – the Board asked if the MO could describe what modifications to the AP were evidenced following the meeting with the CNIL. The MO confirmed that risk of re-identification of the logs submitted to the central entity for auditing was core concern and therefore the most recent meeting with the CNIL was with their “anonymisation department”. The Tech Lab AP working group was considering a proposal that applied “bloom filters” to mask identification and this, as well as other approaches that the AP was considering, was discussed with the CNIL.

*TCF v2.2 adoption* – the MO confirmed that that there was no change to the extended date of November 23 for vendors to complete the transition to v2.2.

- The board noted that additional communication maybe required following the interim ruling from the Market Court, which suspended its deliberations on the merits of IAB Europe’s appeal of the APD validation decision pending the outcome of the referral to the CJEU on the main case. Some vendors had interpreted the interim ruling as meaning that implementation of TCF v2.2 was no longer necessary whilst the CJEU decision was pending.

- Following Board query the MO clarified that TCFv2.2 “not operational”, in the context of vendor registration where vendors are asked to confirm that their “operation is configured to support TCF v2.2”, was an indication by the vendor that their implementation was not *complete*. Once complete, the vendor would tick the box and inclusion on the GVL would follow.

**TCF Risk Registry (Paper 4)** – in respect of its Board duties the Board reviewed the TCF Risk Registry

**Steering Group (SG) update (PAPER 2 09-05-23) for noting** – The Chair of the SG Thomas Mendrina presented the update from the SG and its working groups (WGs) on recent TCF developments that the SG oversaw. The update circulated to the Board prior to the meeting, in line with previous reports, focused on the significant work of the TCF working groups that were supporting the implementation of TCF v2.2: principally the Policy Working Group; and the Framework Signals Working Group (FSWG). As well as the work of the DPA outreach Working Group

The read out of the report stimulated the following discussions:

*TCF v2.2 adoption possible “pain points”* – the Board members agreed that there were no significant concerns although suggested that the reduction in the number of vendors displayed in the UI required careful consideration.

*Reject all* – the Board discussed the requirement of the inclusion of a “reject all” option in the first layer of the CMP UI by more and more DPA across Europe. MO advised that given that various DPAs had differing approaches to the positioning of “reject all”, including in relation to its prominence, that it was necessary to adopt a fluidity in the approach as opposed to being prescriptive. Nonetheless the Policy WG has started to look at ways of addressing this requirement as part of a new work track dedicated to the prevention of dark patterns.

**TCF registration update** – Hassan Siddaq, Business Administrator, IAB Europe presented an update on the TCF registrations highlighting that the vendor renewal rate for 2023 was currently 94%. In addition, TCF v2.2 vendor registrations are currently 704, with less than 10% of the vendors remaining to update to TCF v2.2. Commentary was presented on the new vendors that have registered for TCF in 2023. Geographically the new registrations continued to follow a similar pattern to previously presented with ongoing strong growth from the UK and German markets, and proportionally a notable increase in the Spanish market. Services offered also demonstrated a similar pattern to previous communicated with a continued leaning to delivery systems (DSPs/SSPs) but the MO also highlighted that it was seeing evidence of some new services, not recorded before, such as sustainability service providers, that was broadening the ecosystem representation in the TCF registrations.

**Action:** MO to provide an updated GVL registration analysis for 2023 at the Q4 Board meeting.

**TCF compliance management** – presented by Colombe Michaud, Programme Lead, IAB Europe. In the first instance an update on the tracking and enforcement of the correct declaration of the Device Storage Disclosure URL and the Privacy Policy URL was given, demonstrating significant progress in the numbers. Attention was then drawn to the key compliance management tools that the MO had recently developed that included: “Controls Catalogue” that maps requirements of the Policies and corresponding Technical Specifications to auditable elements that describes IAB Europe’s auditing procedures; “Vendor questionnaire” to be completed at registration;

differentiated enforcement procedures, dependent on the compliance breach. Plus, an enhanced process to compliance management that included random monthly auditing and new complaint handling; updated CMP Validator Chrome extension for TCF v2.2, which is now available publicly in the Chrome Store; additional crawler developments for auditing Vendors & CMPs live installations; new controls in registration pages to block Vendors from submitting inconsistent/incomplete information.

In response to this update the Board raised the following questions:

- What was the approach to the management of the expiry of TCF v2.1 TC Strings post the end of the transition to TCF v2.2? The MO responded that it wasn't appropriate to mandate a specific time and enforce this, as DPAs had different approach for the renewal of choices but proposed that it was planning to compile a table, as a workstream in the DPA outreach WG, which would record the different market approaches. The Board agreed this would be extremely helpful.
- Board was also interested to understand areas of enforcement that the MO planned to focus on beyond those called out in the update. The MO pointed the Board to the Controls Catalogue that highlighted the areas of enforcement that the MO would focus on.

#### **Update to the TCF Governance framework documentation**

The secretariat updated the Board members on a revision to the format and presentation of the TCF Governance Framework documents that now included a TCF Steering Group & Working Group Vademecum and the TCF Governance Board Vademecum.

The Steering Group & Working Group Vademecum consolidated several separate documents into one document that included not only descriptions related to the Steering Group and its Working Groups and the functioning of both, but also the voting process and “stakeholder bucket” management.

The TCF Governance Vademecum had been circulated to the Board Members prior to the meeting and the Board was asked to note and approve the following updates:

- Renaming of the document from TCF Governance Framework to TCF Governance Vademecum
- Update to the footer reflecting the naming convention of the Vademecum
- In addition, there were updates to the term and attendance of Observers, approved by the Board at its Q2 Board meeting in March
  - Consideration of the term of the Industry Association & National IAB observers – that the Vademecum of governance should be amended to record that the term of the Observers should follow the term of the Board members, so Observers are appointed at the same time as the Board members are appointed with 2-year term
  - Consideration of the parameters of attendance – that a minimum level of attendance should be honoured to enable good level of engagement. It was proposed that irregular attendance that equated to 2 non-attendance at consecutive Board meetings would require the observer to step down for the remaining term. It was suggested that this was explicit for both the Industry Association observers and National IABs

**Action:** Secretariat to present to the IAB Europe Board for final approval

**TCF Budget Overview** – The MO advised the Board that a reformatting of the budget was planned that needed to be canvassed with the IAB Europe Board before presentation to the TCF Governance Board could then follow.

**AOB**

There was one other business item proposed and presented by the MO.

Update on DSA – the MO gave a brief update on the DSA as a follow up to the presentation given by the DSA Advertising Taskforce at the Q2 Board meeting. Points highlighted included: reminder of timing of the DSA ads transparency requirements that will apply to all online platforms as from February 2024 and the timing of the IAB Europe working proposal Technical Specification v 0.2 implementation & testing, which is aiming for a September/early October release for market feedback; that user parameters have been chosen to align to TCF data processing Purposes (profiling, basic ads, geolocation) to enable user choice (although MVP parameters could evolve in future); that Tech Lab has been asked to host and iterate on the Technical Specification. The MO also advised the Board that there is ongoing dialogue with EDAA on how IAB Europe standard could enable/support EDAA solution.

**Close**

The Chair thanked the board members who attended in person and those attending online, for their invaluable contributions to the discussion in the meeting.

It was agreed that the next meeting (Q4) would take place online in December 2023  
The meeting closed at 13:45 CET