The Transparency and Consent Framework

TCF 2.0 Release for Public Comment
A full overview for CMPs & Vendors - 8 May 2019

Welcome

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AGENDA

Presentation: TCF v2.0 for CMPs & Vendors (45 min)

- **INTRODUCTION –** Noëlle Chitachi (Director, Privacy & Public Policy, IAB Europe)
- **TCF Overview –** Matthias Matthiesen (Director, Privacy & Public Policy, IAB Europe)
- **TCF 2.0 CMPs & Vendors' Focus –** Matthias Matthiesen (Director, Privacy & Public Policy, IAB Europe)
- **TCF 2.0 Policies –** Alice Lincoln (SVP of Data Policy & Governance, MediaMath)
- **TCF 2.0 Data processing purposes –** Stevan Randjelovic (Brand Safety Manager, GroupM EMEA)
- **TCF 2.0 Technical specifications –** Jennifer Derke (Director of Product, Programmatic/Automation, IAB Tech Lab)
- **TCF CMP Validator –** Patrick Verdon (Technical Director, IAB Europe)

Q&A (45 min)

- Matthias Matthiesen (Director, Privacy & Public Policy, IAB Europe)
- Airey Baringer (Head of Product & Privacy, Quantcast)
- David Dabbs (Senior Product Manager, Conversant)

TCF Overview

Matthias Matthiesen

Director, Privacy & Public Policy

IAB Europe

A SHORT HISTORY OF THE TCF

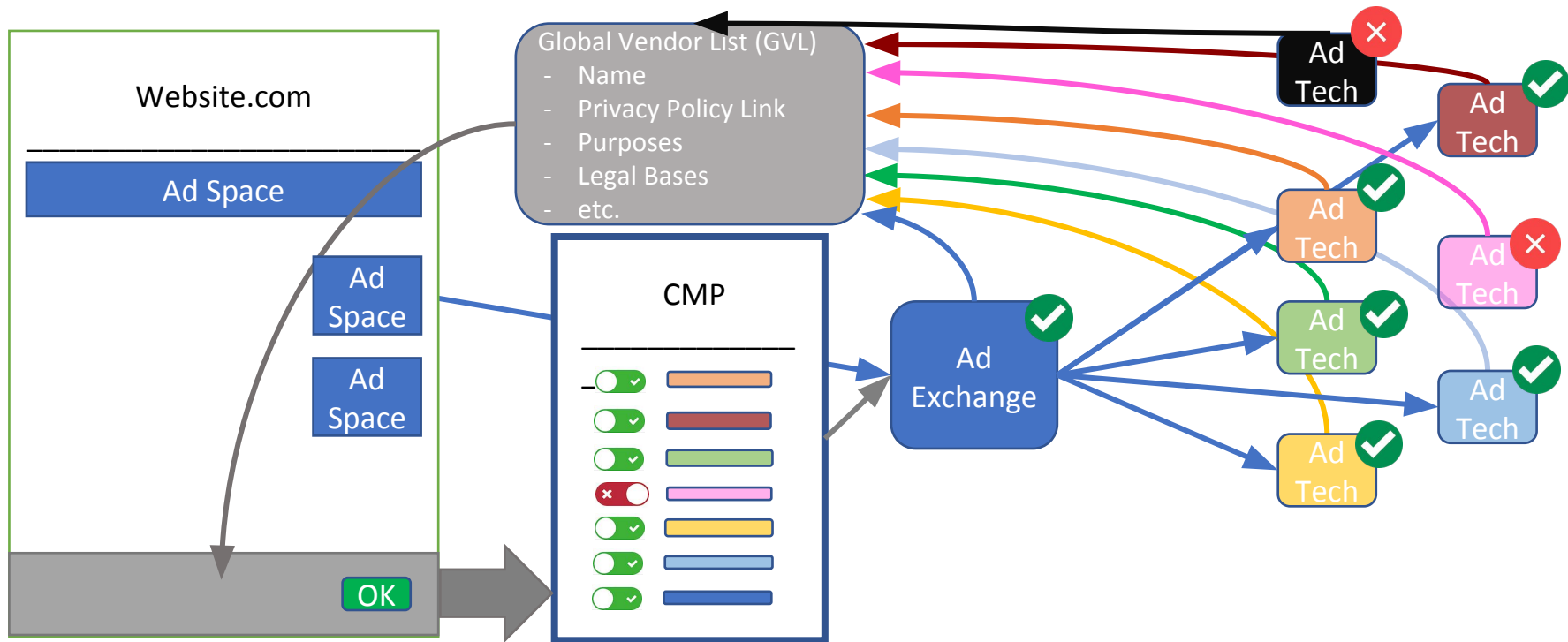- **WHY WAS THE TCF CREATED?**

- **WHO MANAGES THE TCF?**

WHY THE NEED FOR THE TCF?

HOW THE TCF HELPS

Website.com

Ad Space

Ad Space

Ad Space

OK

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

CMP

Ad Exchange

Ad Tech

Ad Tech

Ad Tech

Ad Tech

Ad Tech

Ad Tech
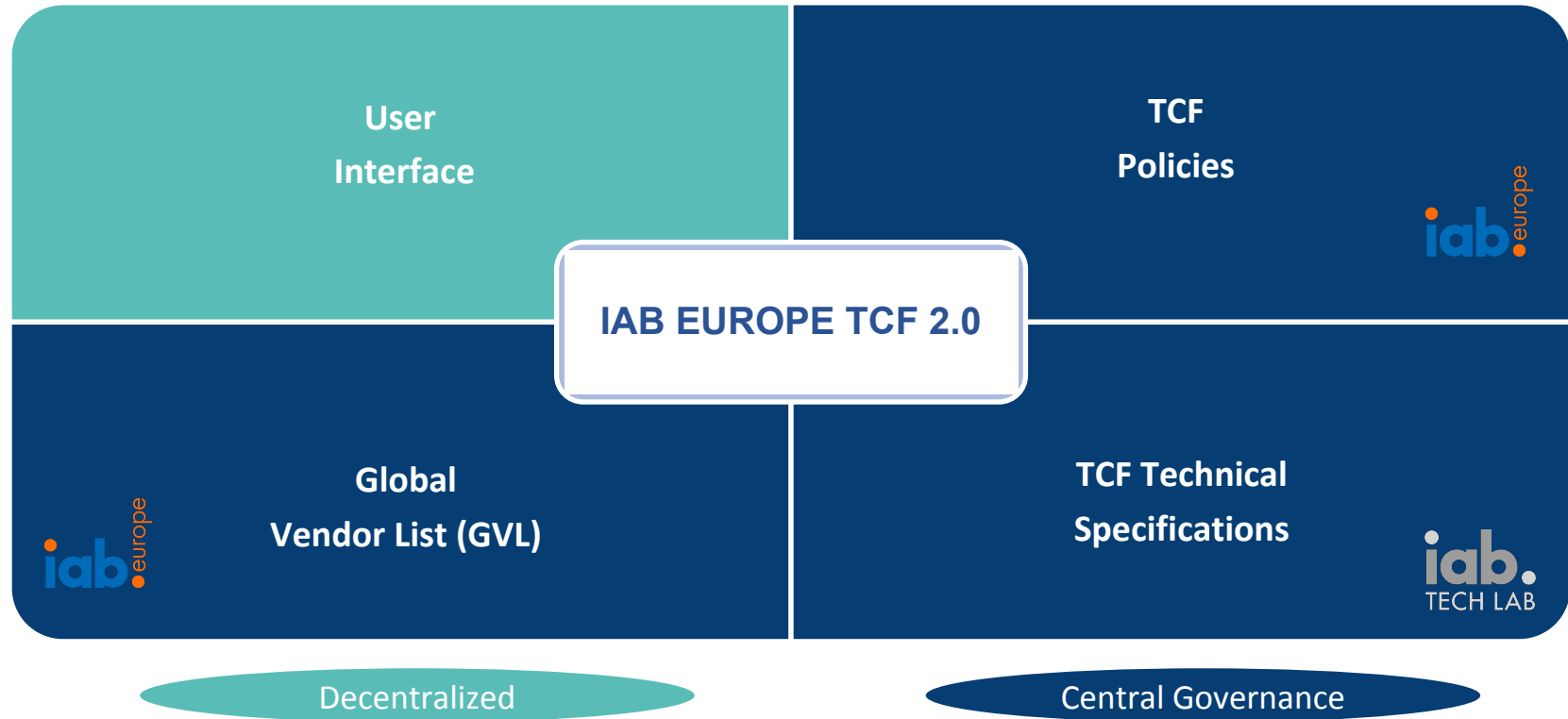
Ad Tech

Ad Tech

Transparency & Consent Framework (TCF)

THE TCF BENEFITS FOR ALL STAKEHOLDERS

- **PUBLISHERS** - A scaleable, efficient way to ensure that publishers' preferred technology partners have a GDPR legal basis for processing their readers' personal data and that publishers can transmit information to their readers and those partners in an interoperable manner throughout the ecosystem.

- **CMPs** - Technical specifications and policies that enable CMPs to capture and communicate information about preferred technology partners and user choices associated with those technology partners, based on a standardized and interoperable signal.

- **Vendors** - A mechanism for ensuring the necessary disclosures have been made and user choices reflected, so that vendors can process user data and access user devices legally.

- **Advertisers** - Transparency to users about advertisers' preferred vendors.

AND MOST IMPORTANTLY, FOR THE USER…

TCF provides both transparency over the use of their data and control regarding their personal data.

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TCF v2.0 PUBLIC COMMENT

25th April to 25th May – 30 days
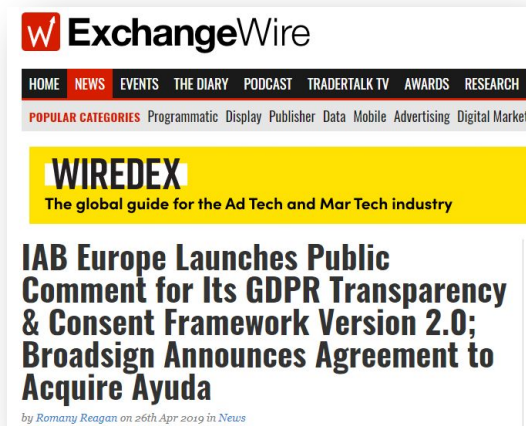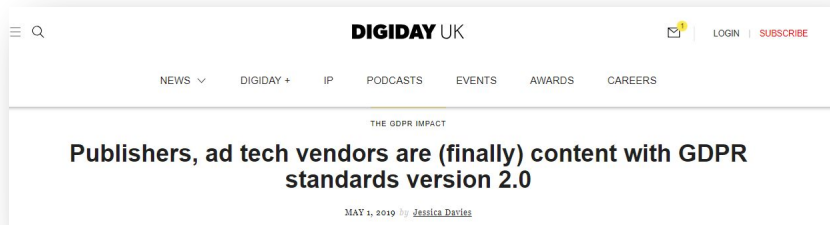
INTRODUCING TCF v2.0

- **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 <u>NEW</u> purposes, definitions and signals

TCF v2.0 FOR CMPS & VENDORS

OVERALL BENEFITS:

- BETTER INFORMED USERS
- SUPPORTS THE BROADER INTERESTS OF THE INDUSTRY

TCF v2.0 Policies

Alice Lincoln

SVP of Data Policy & Governance

MediaMath

FLEXIBLE VENDOR LEGAL BASES

- 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 Vendor allows.

PUBLISHER CONTROLS

- 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.

- Users remain limited to exercising choice on a Vendor, Purpose, and/or Special Feature level without the possibility to select Purposes and/or Special Features by Vendor.

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IMPROVED SUPPORT FOR LEGITIMATE INTERESTS

- TCF v2.0 includes additional signals to TCF v1.0, importantly in relation to processing under legitimate interests
- Vendors will have a signal that tells them whether transparency (without consent) has been established for legitimate interests by Vendor and Purpose
- 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

Stevan Randjelovic

Brand Safety Manager

GroupM EMEA

PURPOSES, FEATURES, STACKS

- The TCF 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.
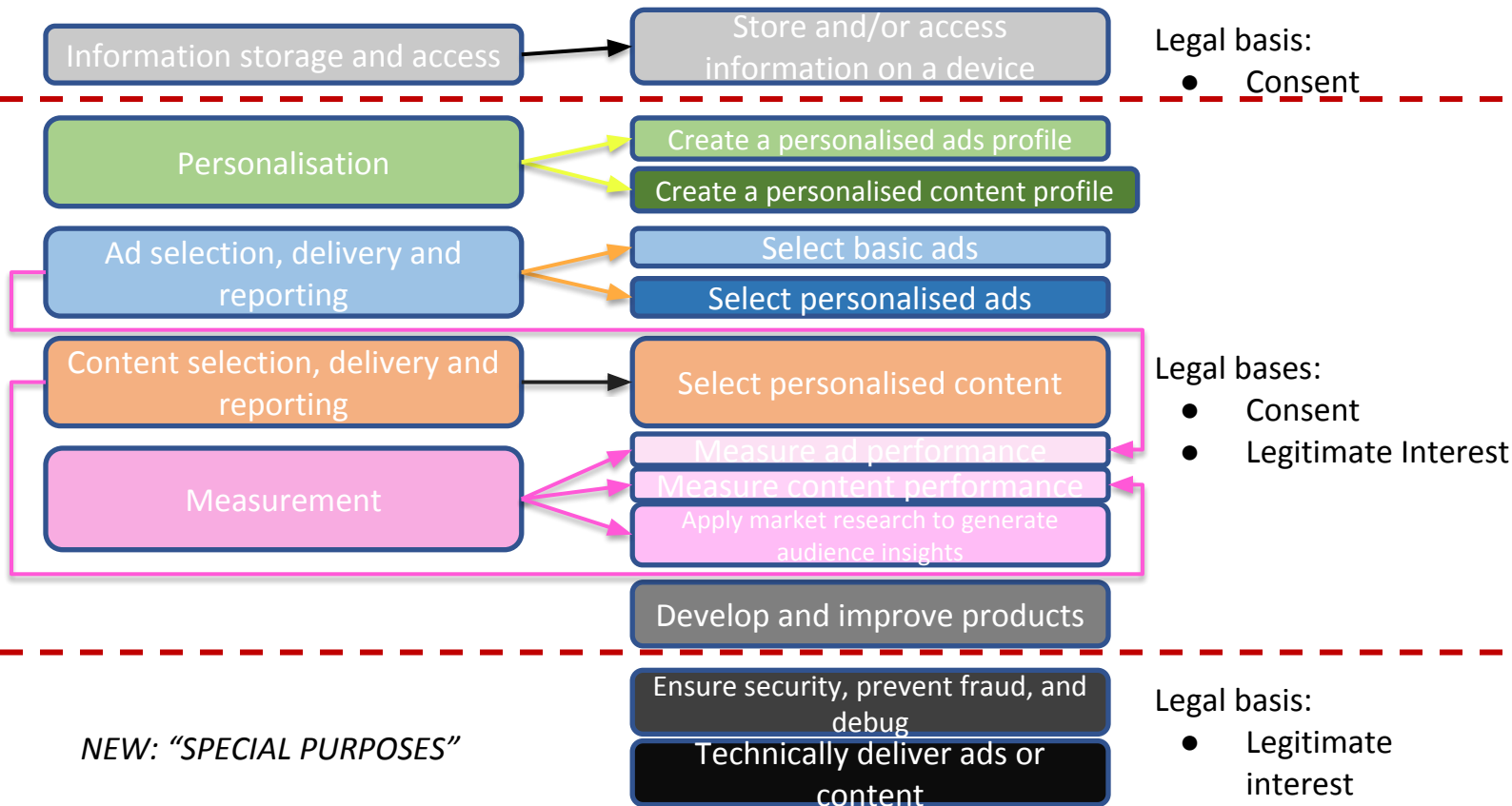
TCF FEATURES v2.0

TCF v1.0

TCF v2.0

| Offline data matching | → | Match and combine offline data sources |

Disclosure only.

| Cross device matching | → | Link different devices |

| Geolocation data |

NEW: "SPECIAL FEATURES"

| Use precise geolocation data |

Disclosure and opt-in required.

| Actively scan device characteristics for identification |

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."

TCF Technical Specifications

Jennifer Derke

Director of Product, Programmatic/Automation

IAB Tech Lab

TCF Technical Operations (Same Foundations in v2.0)

Who "makes" the TC String?

- CMP (Consent Management Provider)

How is user choice collected?

- CMP offering provides a User Interface to collect consumer consent

How is user choice communicated?

- CMP writes a TC String that vendors will read, establishing vendor transparency and communicating user preferences to the ad tech providers

GVL Updates - Benefits for Vendors

TCF v2.0 Global Vendor List Contents:

- A Global Vendor List version.
- A list of standard Purposes, including any Special Purposes.
- A list of standard Features.
- A list of Special Features.
- A list of Vendors with assigned Vendor IDs, the standard Purposes for which they are requesting consent, the standard Purposes they will be using on the legitimate interest legal basis, the Features they may use across declared Purposes, and the URL of their GDPR/privacy policy page.
- Vendor GET limits

TC String Updates - String includes new signals

TCF version 2.0 Transparency and Consent String Contents:

- General Metadata
- User Consent
- Legitimate Interest
- Publisher Controls
  - purposes
  - legal basis*

CMP ID	Vendor Consent	Purpose Consent	Vendor LI	Purpose LI	Special Feature opt-in	Global consent	OOB Allowed?	Custom Stacks	Pub Controls
###	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	###

* only if the Vendor indicates flexibility

Blue: Present in v1.0
Green: New in v2.0

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

Example CMP Workflow Supporting TCF v2.0 TC String

- Estimates the TC string size based on publishers' restrictions
- Displays consent dialog to user and generates a TC string recording user's action.
- Stores the TC string in a browser cookie (if <4k) or alternative storage (e.g. local storage).
- Makes the TC string available to downstream vendors via the CMP JS API.

Example Vendor Workflow Supporting TCF v2.0 TC String

For web inventory, a vendor (e.g. DMP) can access the TC string in 3 ways:
- Via CMP JS API
- Receive the TC string from other upstream vendors that they interact with, even if the vendor does not directly interact with the publisher/CMP.

For mobile app inventory, a vendor can access the TC string in 2 ways:
- Via local storage.
- Receive the consent string from other upstream vendors that they interact with, even if the vendor does not directly interact with the publisher/CMP.

We recommend that vendors send the full TC string to their downstream vendors, if a downstream vendor has some consent or established LI for some purposes.

Moving To Better Consistency & Secure Implementations

From TCF v2.0 on, the TC String will contain a checksum in order to verify if the TC String is "valid" (e.g. not truncated during transmission):

```
var tcstring = "... full TC String in byte representation ...";

var version = tcstring.substr(0,1);

var checksum = tcstring.substr(1,3);

var content = bytes2bits(tcstring.substr(4,99999));
  if(crc16(content) == checksum){/* checksum is ok*/}
```

TCF CMP Validator

Patrick Verdon

Technical Director

IAB Europe

CMP Validator

Supporting participants with a robust compliance checking tool
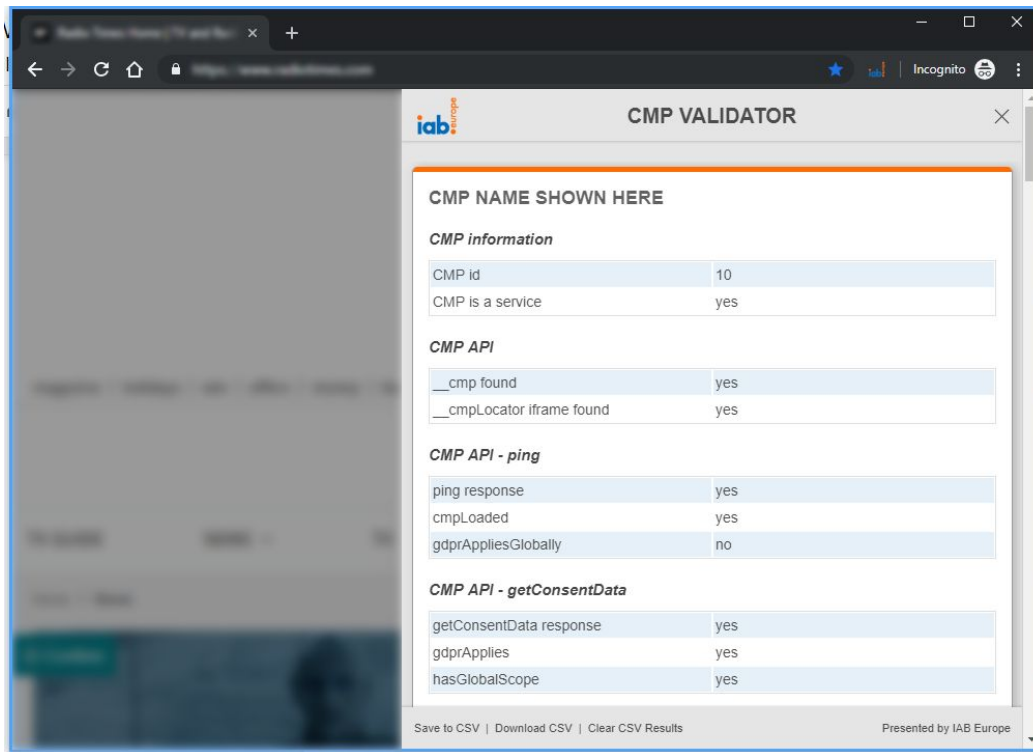
Success of TCF depends on adherence to the framework

- Departures from policy and specifications undermine trust

- This could lead to GDPR liability issues for publishers and/or CMPs

- Supporting the application of the framework is important to its success

CMP Validator

Validator overview

- Ability to check any live publisher site / CMP via Chrome extension
- Analyses CMP implementation:
  - CMP API
  - Consent string
- Checks for common compliance issues:
  - Consent signals sent before affirmative action
  - Old version of the Global Vendor List
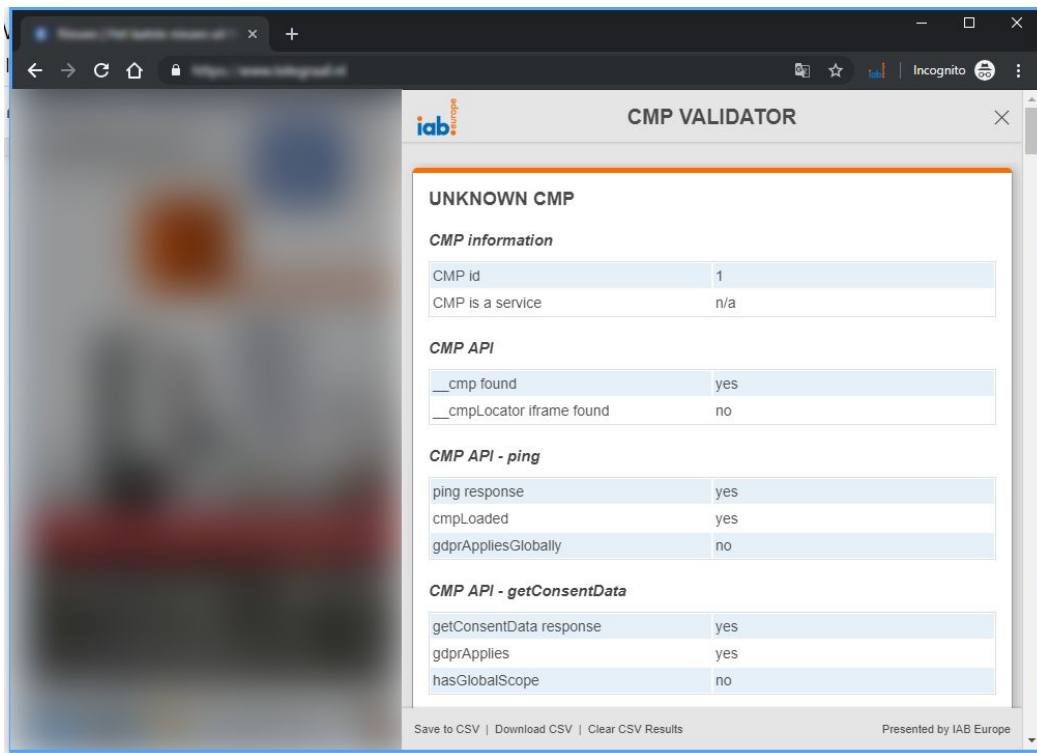 - Invalid CMP id
- Next: manual policy checks

CMP Validator

In action

- Info about CMP installation

- Info used for checks

CMP Validator

In action

- Invalid CMP id issue

CMP Validator

Who will use the tool?

- Internal tool for compliance checking

- Will be made available to registered CMPs and publishers

CMP Validator

IAB Europe CMP Compliance Programme

- We will introduce a compliance programme for CMPs

- New CMP registrations will only be granted after successful checks

- All existing CMPs will be checked with the tool

- Top sites in each European country will be checked with the tool

- CMPs will be given a fixed time to resolve any issues found

- We will publish the full process to the community

- Target date end of May

TCF v2.0 for CMPs & Vendors

Q&A

FOR MORE INFORMATION

www.iabeurope.eu/tcf

To submit feedback on policy: tcfpolicy@iabeurope.eu

To submit feedback on technical specs: transparencyframework@iabtechlab.com

Thank you