TCF v2.0 FAQs

Question	Answer

What is the IAB Europe Transparency & Consent Framework (TCF)?	The Transparency and Consent Framework (TCF) consists of a technical Specifications and Policies for the digital sector that enables companies that participate in or rely on the delivery of digital advertising and targeted content to work under an appropriate legal basis for the processing of personal data and meet transparency and user choice requirements found in data protection laws of the European General Data Protection Regulation (GDPR). It has been developed by IAB Europe in collaboration with organisations and professionals in the digital advertising and publishing industries.
	
	The TCF consists of:
	• A registry of vendors called the Global Vendor List (GVL), which digital property operators, such as publishers, can use to see whether the vendors they work with participate in the TCF, the purposes for which they process personal data, and the legal bases on which they do so.
	• A list of consent management providers (CMPs) that can work with digital property operators
	• Policies and terms & conditions underlying:
	   o Vendor registration on the GVL
	   o The disclosures to be made about vendors included on the GVL
	   o Use of the technical standards by publishers and vendors on the GVL
	• Technical standards covering:
	   o Retrieval of information from the GVL about the vendors it works with to disclose that information to a publisher's users
	   o Capturing, storing and retrieving a user's choice about each vendor
	   o Dissemination of that information through the advertising ecosystem so that vendors know whether they have the appropriate permission and legal basis to process a user's

	personal information
Why was the TCF created?	The TCF was created to help companies who display and manage digital advertising and develop targeted content comply with the European General Data Protection Regulation (GDPR) and ePrivacy Directive (ePD) when processing personal data or accessing and/or storing information on a user's device. The user is therefore the principal focus of the TCF, designed to give them both transparency over the use of their data and control over how their data could be used if consent is given. In each instance of the development of the TCF the user remains central to its objective. The TCF was launched on 25 April 2018 and is the only digital advertising industry transparency and consent framework built in response to GDPR as a cross-industry initiative, offering a standardised approach to legal compliance.
Who is the TCF designed for?	The TCF is designed to help digital property operators, such as publishers and advertisers, work with technology vendors that provide data-driven services which support both their operations and commercial activities. It supports a diverse array of companies in the digital advertising supply chain in their compliance with data protection laws when accessing and/or storing information on a user's device or processing personal data. Central to the design of the framework is the opportunity it gives digital property operators to communicate to their users what data is being collected, how a digital property and its vendors intend to use it, and which vendors intend to use it and how users can exercise complete control over this process. Delivering the transparency and user choice requirements found in data protection laws of the European General Data Protection Regulation (GDPR) is core to the operation of a digital property. The TCF was designed to support the digital advertising sector meet both the needs of the consumer at the same time as providing a commercially sustainable future for suppliers of

	the digital services that users wish to access.
Who manages the TCF?	The Managing Organisation (MO) is IAB Europe. IAB Europe works closely with IAB Tech Lab to collaborate in the management of participating companies, experts and working groups that create the common policy and technology specification that underpin the TCF. Within its role of MO, IAB Europe takes specific responsibility for TCF Policies, compliance, and management of the Global Vendor List (GVL) and CMP administration. IAB Tech Lab is responsible for developing and iterating on the technical specifications associated with the TCF. IAB Europe, IAB Tech Lab and industry partners have remained passionate about making a sustainable framework that truly delivers user transparency, choice and control. Without the standardisation and common methods provided by the TCF, such as common definitions of the industry's personal data processing operations and purposes and technical mechanisms to offer and give effect to user choice and control, compliance with EU data protection law would at best be more confusing and expensive, and at worst, impossible.
Why did you create an updated version of the TCF, TCF v2.0?	Successful management of technical frameworks over time requires continual consultation with its users and the broad base of stakeholders. For the TCF, that includes publishers, advertisers, media agencies, and technology providers. Over the past 12 months, stakeholder feedback has been sought, most notably from the publisher community providing valuable feedback on how the framework can be improved and better serve the community. This has driven the creation and purpose of TCF v2.0. In addition, feedback from regulators on TCF was sought and incorporated. The vision for TCF v2.0 is to provide enhanced transparency and choice to consumers and greater control to publishers.
Who contributed to developing the second iteration of the TCF, TCF v2.0?	Much like TCF, TCF v2.0 was developed with an emphasis on creating an industry standard through the inclusive, fair and consensus-based participation of stakeholders. The community of TCF stakeholders is broad and includes publishers, technology providers and advertising and media agencies. IAB Europe as the Managing Organisation (MO) of the TCF

	established a TCF Steering Group (SG) whose mission is to bring together these stakeholders to actively contribute to iterating on all non-technical aspects of the TCF and engage with the IAB Tech Lab, which owns iterating on the technical specifications.
	Substantive scope of the SG includes definition of policy requirements, identification of new features and functionality to align to regulatory and policy requirements, validation of vendors and CMPs, and dialogue with European data protection enforcement authorities. The SG convenes working groups as necessary to propose solutions to problems identified by the SG and is the "plenary" to whom working groups report. The Tech Lab has an established GDPR Working Group that is responsible for the technical iterations that are managed by the Tech Lab Commit Group
Who was involved with creating the updated Policies for TCF v2.0?	IAB Europe's TCF Steering Group (SG) was responsible for creating the updated policy requirements. The SG consists of IAB Europe membership and actively encourages participation from all companies in the digital advertising supply chain, including publishers and digital property operators, technology providers and advertising and media agencies and industry associations representing them. It has various working groups that report to it, including the Policies Working group, which is responsible for the Policies, and the Purposes Working Group that redefined the purposes and features of processing personal data that the TCF supports.
Who was involved with creating the Technical Specification for TCF v2.0?	The IAB Tech Lab's GDPR Technical Working group was responsible for creating the updated technical specification for TCF v2.0. The working group involves companies that are actively engaged in all aspects of the digital advertising supply chain from digital property operators and app developers to tech vendors and media buyers. More broadly the IAB Tech Lab GDPR Technical Working group is tasked with iterating on the technical specifications associated with the TCF, managing and maintaining the TCF reference architecture, protocols, and specifications and providing technological solutions to new challenges presented as a result of new policy requirements resulting from TCF Policies updates. The governance of the IAB Tech Lab GDPR Technical Working Group is overseen by the IAB Tech Lab Commit Group

What are the benefits of the TCF v2.0?	TCF v2.0 has been developed to provide both users and publishers with greater transparency and control. Under TCF v2.0, not only can the user give or withhold consent, but they can also exercise their 'right to object' to data being processed on the basis of legitimate interests. It also enables greater transparency for the user, through more detailed descriptions of the purposes of data processing. The publisher can also exercise increased restrictions on both the purposes and legal bases upon which a vendor can process data collected on their digital property enabling greater customisation of the vendor operation. In addition, the vendor is able to process under legitimate interest if not restricted by the publisher or objected to by the user. These increased levels of transparency and control throughout the supply chain support a more streamlined and transparent user experience. *TCF v2.0 continues to support the overall drive of the TCF to increase user transparency and choice, management by digital properties of consent and compliance and industry collaboration that centres on standardisation. Specifically, TCF v2.0 is supporting* - *Choice* - through revised definitions and descriptions of data processing purposes that combine greater granularity (now increased from 5 to 10 purposes with the addition of 2 special purposes, and 2 features and 2 special features) that will enable users to make informed choices regarding the processing of their personal data - *Transparency* - with a more complete accommodation of the "legitimate interests" legal basis for data processing and the introduction of signals that allow CMPs to offer users a streamlined means of exercising the "right to object" to processing on the basis of a "legitimate interest" - *Control* - with new, granular controls for publishers about the data processing purposes permitted by them on a per vendor basis - *Compliance* - through greater support for the users of the framework in their application of the policies, terms and conditions and technical specifications with increased investment by IAB Europe in the resource to support this
What are the benefits for	<u>Publishers can provide more transparency to their users</u> with the introduction of clearer and more detailed purposes and standardised flexibility in how

Publishers?	those purposes are described to their users. Publishers benefit from their users being better informed about the vendors publishers are using to deliver advertising and targeted content and having greater control over how those vendors use their data. Publishers have greater control in version 2.0 of the TCF. The ability of the publisher to specify custom requirements ("publisher restrictions") has been introduced allowing the publisher to have greater control over how and who it works with. Publisher restrictions allow digital properties to granularly control vendors and their use of personal data and enable custom requirements, for example: - Purposes - more granular control over the purposes for which personal data is processed by a vendor; - Legal basis - specify the legal basis upon which a publisher requires a vendor to operate if the vendor provides options to publishers. Greater flexibility in storage of service-specific (publisher-specific) purposes with direct encouragement to consider storage mechanisms that are beyond "cookie" storage
What are the benefits for Vendors?	Better informed users is a benefit to vendors. Vendors in the advertising ecosystem benefit from consumers being better informed and having more control over their data and vendors benefit from this and the ability for consumers, publishers and vendors to talk about and signal those controls in a standard manner throughout the advertising ecosystem. Support the broader interests of the industry through the explicit signalling of whether transparency has been provided to users about processing of personal data under the legitimate interest legal basis, and whether the user has objected to such processing, in addition to the accommodation of the consent legal basis
What are the benefits for consumers?	Consumer will see an increase in controls in TCF v2.0 with the more comprehensive inclusion of the functionality within the TCF for a consumer to exercise and signal the "right to object" (RTO) to processing based on a

	legitimate interest legal basis and a new signal to allow parties in the advertising supply chain to receive standardized signals through the TCF (vs. outside the TCF) that the user has objected to such processing / exercised the RTO. In addition, the consumer can also control how vendors may use certain "features" (i.e., data types and aspects of processing whose use can be integral to processing for many purposes) with an opt-in mechanic for "Precise Geolocation" beyond operating system controls and "active device scanning" In addition, there will be a: Broadening of transparency for the consumer with more detailed and user-friendly definitions of the purposes under which the parties in the digital media ecosystem can process data increasing the number of purposes from 5 to 12 and including two special features - geo-precise location and active device scanning for identification.
What are the main differences between TCF and TCF v2.0?	TCF v2.0 provides the following above the current technical specification and policies provided by TCF: • Increased and more "user friendly" detail on purposes – significant time has been spent tailoring the industry's standardised processing purposes to make them even more granular and user friendly and to provide (standardised) flexibility to publishers in how they wish to message these purposes to their users. There are now 10 purposes (as opposed to 5 in TCF) and 2 special features. • A more complete accommodation of the "legitimate interests' legal basis for processing personal data including signalling of a user's "right to object" (RTO) within TCF v2.0 signals • Greater publisher controls – enabling a publisher more granular control over the purposes for which personal data is processed by a vendor on a per vendor basis. V2.0 also allows publishers greater control over they the legal basis upon which a vendor operates. This allows vendors to more easily operate in different markets where publishers have different perspectives on the appropriate legal basis on which they (and their vendors) process personal data. • Greater flexibility in storage mechanism for publisher and user

	choice - used for service-specific (containing publisher purpose restrictions) vendors and user choice. The CMP does not automatically have to use a "cookie". In TCF the consent string was stored as either a 1st party cookie for service-specific and publisher-specific purposes consent or a 3rd party cookie for global consent. NB global TC strings must still be stored as "cookies" under the global consensu.org.domain; in addition, publisher descriptions can only be stored in a service-specific TC string Introduction of the Transparency and Consent String - the TC String – in place of the naming convention "daisy bit", the name "TC String" has been introduced as a clearer naming convention (in line with the drive for greater transparency) BUT note it still operates as a binary string of individual bits that work to the encoding process of base64; the name may have changed but the basic programming of the string has not changed. The information stored, because of greater consumer choice has though significantly increased.
How does the TCF help publishers?	The TCF supports all digital properties that employ advertising as a commercial vehicle to support the creation of content or services on their digital property, use content personalisation technology, or measurement and analytics tools, and all companies that in turn support the rendering of advertising on these digital properties, content personalisation or measurement and analytics. It does this by enabling the publisher to work with a Consent Management Provider (CMP) that is a company or organisation that centralises and manages transparency for, and consent and objections of, the end user. The CMP can read and update the legal basis status of vendors on the GVL, and acts as intermediary between a publisher, an end user, and vendors to provide transparency, help vendors and publishers establish legal bases for processing, acquire user consent as needed and manage user objections, and communicate legal basis, consent or and/or objection status to the ecosystem. A CMP may be the party that surfaces, usually on behalf of the publisher, the UI to a user, though that may also be another party. CMPs may be private or commercial. A private CMP means a publisher that implements its own CMP

	for its purposes. A commercial CMP offers CMP services to other parties. Unless specifically noted otherwise, these policies apply to both private and commercial CMPs.
What does consent mean under GDPR?	Consent means that the user actively agreed to the processing of his/her personal data. In order for consent to be legally valid, the following requirements must be met: • Freely given: • Specific: • Informed: and • Unambiguous