

CMP Complement & AdChoices Signal FAQ

What is the CMP Complement project?

The DAA's CMP Complement project is the assembly of several technical documents and an integration guideline targeted at Consent Management Platforms (CMPs). The documents include:

1. **AdChoices Signal Specification** (to share signals from DAA tools to CMPs and third-party participants)
2. **AdChoices User Preferences API** (to facilitate the sharing of the signal)
3. **CMP Complement Implementation Guide** (to explain how to display AdChoices interfaces and Icon)
4. **A partnership agreement with the DAA** (to officially register with the DAA and give rights for CMPs to use the AdChoices Icon on behalf of their clients)

The CMP Complement project aims to embrace a digital world where CMPs are widely used by AdChoices program participants.

What is the AdChoices Signal & why is it needed?

Until now, there has been a disconnect and no technical integration between DAA tools and Consent Management Platforms (CMPs). When a consumer expresses a choice or preference in the DAA tools, CMPs are unaware of these choices.

The AdChoices Signal creates a technical mechanism for integration between the AdChoices program and CMPs in two key ways: (1) bridges user choices by communicating between the DAA tools and CMPs on the backend, and, (2) supports the creation of new simplified AdChoices interfaces, hosted by CMPs, that allows the re-opening of broader control settings.

By offering a machine-readable string to encode user choices and making that string available to CMPs and other participating ad tech vendors who then persist those preferences (with an identifier of their choosing), consumer preferences for IBA can be remembered in a more global and lasting manner. Furthermore, CMPs provide another important real-time consumer touchpoint for privacy controls. They are being placed front and center with consumers, and through this extension of the AdChoices Icon program, this partnership with CMPs stays true to the DAA mission and extends the program beyond its existing tools and footprint.

What is the benefit of the CMP Complement project for consumers?

Consumers want to have a voice & greater control over their personal information and the advertising they receive. For over ten years, the DAA has maintained choice mechanisms for interest-based advertising. The newest tool, called the Token ID-Based Choices Tool (for opting out of the use of token identifiers, such as hashed email addresses and phone numbers, for IBA), will soon generate the AdChoices Signal. The Token ID-Based Choices Tool will also offer a simplified array of interest categories in the future, to encourage the consumer to not entirely opt-out, but to signal their interests to participating companies.

The benefit to consumers is that by using the Token ID-Based Choices tool, their selections can be shared with integrated CMPs, extending the footprint of their choices across the network of CMPs that accept the signal.

What kinds of identifiers are supported?

The AdChoices Signal specification is agnostic to identifier type and does not prescribe what sort of identifier an AdChoices Signal is associated with. It may be associated with a cookie ID, mobile advertising ID, token (e.g., hashed email), or any other identifier as desired or supported between the DAA and participants or between participants interacting with each other. It is up to participants and CMPs to decide on the identifiers they wish to implement for choice persistence. The AdChoices Signal can be associated with any of them.

What is the consumer experience after they click on the AdChoices Icon?

The CMP Complement Implementation Guide introduces new UX opportunities for consumers to make choices. These interfaces are to be carefully constructed by CMPs using the DAA guidance. Having simplified user interfaces available wherever a consumer sees the AdChoices Icon aims to standardize consumer experiences while providing compliance stability for program participants.

Does the in-ad experience change at all with the AdChoices Icon?

When a consumer interacts with the AdChoices Icon inside an ad, the experience should be enhanced but ultimately similar to what it is today. The Approved Providers of the DAA program will continue to offer in-ad support for the AdChoices Icon and provide a customizable overlay once the consumer clicks or taps on an ad's Enhanced Notice.

What does a First Party need to do?

A first party is generally an entity operating its own commercial website or app where IBA activities are happening (e.g., a publisher or a brand). First parties may choose to work with a Consent Management Platform (CMP) to gather appropriate consent from visitors. First parties that are AdChoices participants should ensure they are working with a CMP that has an AdChoices integration so that consumer choices made on the DAA tools can be honored by their CMP and can show an AdChoices interface for them (if the client wishes to use it and not

build out their own dedicated AdChoices notice). Some brands may have a Customer Data Platform (CDP) in place instead of a CMP. In such cases, brands should find out if their CDP has an AdChoices integration in place and encourage their partner to accept the signal.

What does a Third Party need to do?

A third party is generally any company or technology provider that is used (directly or indirectly) by first-party website operators to facilitate IBA. Third parties can support the transmission and/or consumption of the AdChoices Signal, if they choose to integrate it. Whether this is done through an on-page API or through URL-based macros, it is recommended that third parties read and respect the AdChoices Signal. It is also recommended that third parties register as official DAA participants and be part of consumer-facing choice mechanisms (the DAA tools) as required.

Aside from communications between the DAA and participating companies, AdChoices Signals may be passed between companies when there is a need for one party to inform the other about the user's IBA choices.

What does a Service Provider (like an ISP or browser) need to do?

Generally, ISPs and browsers should not interfere or otherwise cause trouble with the transmission or persistence of user preferences. For an internet service provider (ISP), nothing needs to be done regarding the AdChoices Signal. For web browsers, providing a way to maintain user preferences via some persistence mechanism, whether that be cookies or HTML5 localStorage, would be helpful.

What does a CMP need to do?

A Consent Management Platform (or CMP) is designed to manage consumer consent for legal compliance. As a consumer-facing product, CMPs are already responsible for storing and remembering consumer consent choices. However, CMPs that are integrated and authorized to work with the DAA's AdChoices Signal also need to be able to receive and remember consumer choices made via DAA tools.

The DAA's Token ID-Based Choices Tool offers opting out/revocation of IBA using a hashed email address as the identifier. The AdChoices Signal is a technical specification that shares consumer preferences received by the DAA's Token ID-Based Choices Tool with CMPs that a consumer may encounter while surfing the web. Consumer choices can be recognized by CMPs receiving the signal, extending the footprint of their choices.

CMPs need to implement a standard mechanism for on-page AdChoices Signal access (e.g., the CMP Complement Implementation Guide and the AdChoices User Preferences API) and/or support the transmission or passing of the AdChoices Signal via URL-based macros to other parties in the ad tech ecosystem. Moreover, CMPs need to be able to show the current state of

a consumer's AdChoices preferences and provide a link back to DAA choice tools within the CMP user interface for users wishing to update their preferences.

Is there a role for ad agencies?

Ad agencies can play an educational role for both clients & vendor partners. Agencies should ensure their ad tech partners use the solutions provided to the industry by the DAA, particularly the choice tools.

How does the AdChoices Signal work in the app world?

Materially, the AdChoices Signal should work the same in the app world. When a consumer makes their choices in the DAA's AppChoices tool, it calls out to all the DAA participant endpoints. Participating CMPs would receive the AdChoices Signal in addition to DAA participants, but instead of making the AdChoices Signal available to other parties via on-page JavaScript API, for example, it would need to be made available via their in-app CMP API.

Is there support for other media channels beyond display and mobile?

The AdChoices Signal is extensible in nature and can work across other media channels – such as Out of Home (OOH) or connected TVs (CTV), for example – however, there needs to be a mechanism for capturing and transmitting a user identifier for it to be feasible. Furthermore, for the AdChoices Signal to be used to communicate a user's interest-based advertising preferences, there must be an ability to be transparent to the consumer, such as presenting a custom interface or the creation of additional settings on the device or software in question.

How does the AdChoices Signal interoperate with the IAB's Transparency and Consent Framework (TCF)?

The IAB's Transparency and Consent Framework (TCF) is used in jurisdictions where consent is the primary means to conduct interest-based advertising (and other marketing-related activities, such as analytics). The AdChoices Signal is complementary to the TCF, providing network-wide choices for the user in partnership with CMPs. There is no direct interoperability between the AdChoices Signal and the TCF because the string formats and resource files are different. However, they are technically similar in that they both encode user expressions into machine-readable strings. These strings are then easily stored and transmissible through common technology vendors, namely CMPs. Furthermore, the AdChoices Signal specification includes a 'gvl' field for participants to easily look up participants by their TCF vendor ID as a way to make implementation easier for companies that have already implemented TCF.

If there is a conflict between the TCF and AdChoices signals, which one takes precedence?

It is important to understand that the scope of the TCF and AdChoices strings are fundamentally different. TCF strings are always associated with a user's consent choices on a specific website

or app and are much broader than IBA. AdChoices strings, on the other hand, are associated with a user's choices for IBA across websites and apps. The DAA's view is that global choices (specifically the IBA choices signaled through the DAA tools) should take precedence over individual site choices (again, specific only to targeted advertising in this use case). However, string recipients will have to consult their own legal counsel to decide what makes the most sense for them, understanding that the scopes of the strings are quite different.

What is the difference between the IAB's Global Privacy Platform (GPP) and the AdChoices Signal?

The Global Privacy Platform (GPP) is a multi-jurisdictional privacy signaling framework designed by the IAB Tech Lab to support a variety of privacy-related signals. The GPP is not a signal itself, but a standard "container" for transmitting a multitude of signals. The GPP also has its own standard JavaScript API for retrieving GPP strings. This makes it easier for CMPs to support a variety of privacy preference strings (potentially including the AdChoices string) without having to implement numerous JavaScript APIs. With that in mind, the AdChoices Signal is technically compatible with the GPP framework. A formal integration is possible for exploration.

Does the AdChoices Signal meet Global Privacy Control requirements?

Global Privacy Control (GPC) is a requirement under the California Consumer Protection Act (CCPA). GPC is a browser setting that notifies websites of a user's privacy preferences, such as not to share or sell personal data without their consent. The GPC specification boils down to a simple boolean value: true or false. If true, the user requests that their data not be sold or shared globally. In the AdChoices Signal, there is a Global Choice Status field in the header, which could be interpreted as an equivalent to the GPC's 'Sec-GPC' value being 'true.' In theory, the AdChoices Signal could support the GPC's requirements, but implementation has not yet been explored and the scope of the AdChoices Signal is just for interest-based advertising.

How are interest categories supposed to be interpreted in the AdChoices Signal documentation?

Interest categories pertain to the category of the creative being shown to the consumer.

A short list of categories will be offered to consumers visiting the Token ID-Based Choices Tool, which will then be signaled to participants and CMPs/CDPs integrated. With wide market adoption in place, if a consumer opts out of automotive ads on the Token ID-Based Choices Tool, they should no longer receive interest-based ads with creative elements dealing with automotive subject matter from organizations integrated with and honoring the AdChoices Signal.

As mentioned in the AdChoices Signal specification document, category-level preferences will initially be offered to consumers on a best-effort basis as companies work over time to implement systemized ways in which to be responsive to these consumer signals.

Further guidance around the time-to-live or duration of expressed preferences will be included in future updates.

How will accountability be applied to the AdChoices Signal?

Any discussion of accountability will not happen until the market has had a chance to adopt the AdChoices Signal and get familiar with the new preference categories (likely two years or more out from launch), at which time changes to accountability will be reevaluated as necessary.