

CMP CoMPLement

Implementation Guide for

On-Site,

In-App, and

On-Device Interfaces¹ (Beta)

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This document describes a routine and repeatable consumer-facing experience, facilitated through a consumer's use of the AdChoices Icon², that can be hosted by DAA Recognized Consent Management Platforms (CMPs).³

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AC **Digital**
Advertising
Alliance of
Canada

edda
EUROPEAN
INTERACTIVE
DIGITAL
ADVERTISING
ALLIANCE

apda
Alianza de Publicidad
Digital de Argentina

¹ On-device may be interpreted as connected devices that allow for transparency notices. This portion of the guide is still in early stages of socialization and development. Any on-device representations herein are for illustration purposes only at the time of this release.

² For this document, “AdChoices Icon” can also include the AdChoices Ad Marker, which consists of the icon graphic plus a text descriptor such as the phrase AdChoices, etc.

³ “DAA Recognized CMPs” is shorthand for a CMP, cookie banner, or other similar technology providers. DAA Recognized CMPs conform with this set of specifications and have entered into a formal agreement to be bound to such specifications and therefore recognized as such.

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Introduction

The DAA (US), DAA Canada (DAAC), European Interactive Digital Advertising Alliance (EDAA), and the Alianza de Publicidad Digital de Argentina (APDA) and other DAAs in the future (cumulatively, the DAA Global Network) operate self-regulatory programs in multiple countries. The AdChoices programs in these countries help companies provide consumers with notices outside of the privacy policy about data collection and use for relevant advertising practices. This work has led to trillions of AdChoices Icons being served in ads, on sites, and in apps as ubiquitous signs of the industry's and each participating company's commitment to privacy-enhancing technologies & techniques for the benefit of consumers.

As new user interfaces gain adoption in the market in response to new technological and legal requirements, the DAA Global Network provides this guide to help companies leverage the established benefits of the AdChoices program within the contexts of elements such as Consent Management Platforms (CMPs), cookie banners, and related technologies.

How the AdChoices Interface Helps Consumers and Companies Engage in CMP Contexts

The AdChoices Icon has become a predictable, well-established and widely-deployed user interface. This CMP Complement Implementation Guide offers companies ways to provide that enhanced transparency in new and emerging user experiences while retaining the real-time privacy gateway experience intrinsic in the AdChoices Icon.

To date, there has been no formal technical or UI integration between the AdChoices Icon (and its enhanced transparency and control functions) and CMPs. The growing use of these platforms presents an opportunity for responsible marketers to provide real-time functionality about advertising choices within the CMP directly from the AdChoices Icon. Thus, using this new “real estate” in a CMP for a dedicated way to satisfy the enhanced notice and control (including network-wide choice) elements of the cross-industry self-regulatory programs.

For more than a decade, AdChoices has offered broad, industry-wide control options to consumers, sometimes referred to as network-wide choice. This option has become an expected part of the choices provided to consumers. **Deploying a CMP alone as a substitute for AdChoices Certification does not align with this expectation.**

For on-site, and in-app notices via a CMP, the AdChoices interface can display preferences beyond the site-by-site choices currently available in CMPs by exposing existing network-wide choice tools. This will allow companies to align with a longstanding cross-industry policy for consumer choice.

DAA participants can work with DAA Recognized CMP partners to adapt the modules and user flows, such as by adding brand logos, changing coloring, and sizing, and altering the notice statements to best reflect the participant's interest-based advertising activities within DAA guidelines. And lastly, making sure the brand voice is correct in addressing interest-based advertising-related privacy questions directly with consumers, including offering the ability to make interest-based advertising choices at the network-wide level, which has been the historical choice setting of the industry for more than a decade and which is not native to CMPs.

How the AdChoices Interface Helps Participants

The AdChoices interface inside a CMP proposed within this guide can provide a harmonized and predictable enhanced notice user experience post-click/tap of the AdChoices Icon. This interface is essential in contexts where:

1. The participating company chooses to use a CMP/cookie banner as part of its enhanced notice user flow for the AdChoices program;
2. After an individual has navigated past an initial site-specific notice (e.g., a cookie banner) upon first (and subsequent) visit(s) to a participant's digital property; and/or
3. After a CMP/cookie banner has timed out and the consumer wants to prompt/re-prompt the experience from the AdChoices Icon on a site, app, or, in the future, on-device.

The AdChoices interface:

- Reinforces consumer experience with the trillions of AdChoices Icons served on digital properties;
- Provides an avenue for participants (particularly brands/publishers) to leverage their CMPs/cookie banners for enhanced notice;
- Leverages the existing industry-wide tools for centralized, network-wide privacy choices as a complement to site-by-site selections;
- Allows a path for DAA Recognized CMPs to receive and persist consumer choices from the DAA Token Tools across their network of sites/apps; and
- Helps participating companies with AdChoices deployment.

Using these recommendations, companies can continue to provide AdChoices Icons as always-available touchpoints for consumer transparency and control.

Scope

DAA Recognized CMPs may use this guidance to craft reliable and predictable AdChoices experiences at the site/app/on-device level. A DAA Recognized CMP is a company that offers a CMP solution that meets the specific requirements promulgated herein, and has registered to acknowledge and publicly affirm its intent to create interfaces, user flows or modules functionally equivalent in nature to those detailed herein.

The following describes the AdChoices experience at the site/app/on-device level. **The mock-ups are not meant to be viewed as final or prescriptive user interface design.** Design examples are for illustration purposes only. DAA Recognized CMPs may reposition interface elements as they see appropriate and are highly encouraged to enhance these interfaces in meaningful ways with their clients, keeping in mind that the consumer should receive clear, meaningful, and prominent notices in the design phase.

AdChoices interfaces should be graphically flexible and may match the look & feel of a First Party's⁴ owned or controlled digital property in consultation with the DAA Recognized CMP, provided the functionality in this document is in place.

DAA Recognized CMPs Must Register

“DAA Recognized CMPs” is shorthand for a CMP, cookie banner, or other similar technology provider who conforms with this set of specifications and have entered into a formal agreement with DAA to be bound to such specifications and therefore recognized as such by the DAA Global Network.

It is expected that only CMPs that commit to this registration publicly with the DAA will have access to the AdChoices Signal (discussed below) and offer their services as a DAA Recognized CMP. To register, thereby demonstrating support for this set of recommendations, please [contact us](#).



Example wording that DAA Recognized CMPs can use in AdChoices interface modules.

⁴ A First Party is an entity that operates or controls digital property(ies) with which the consumer interacts, and that allows Third Parties to collect and use data for interest-based advertising (IBA) and other purposes not in the DAA Purpose Limitations. Companies engaged as Third Parties may also be a First Party to the extent they operate or control a digital property where data is collected for IBA and other purposes not in the DAA Purpose Limitations.

Consent Management Platforms & the AdChoices Interface

DAA participants that engage with a DAA Recognized CMP can leverage these relationships to help them with their AdChoices program deployments.

How AdChoices Complements CMPs

The functionality of CMPs and AdChoices programs are fundamentally different yet complementary. For example, CMPs may offer visitors to a website with controls over certain activities when visiting a First Party's owned and controlled digital properties. For more than a decade, AdChoices has offered broader, industry-wide control options to consumers, sometimes referred to as network-wide choice. This broader option has become an expected part of the suite of choices provided to consumers.

It is important to note that using a CMP or similar user interface alone to replace the AdChoices site/app/on-device-level notices may not on its own provide the enhanced transparency and control contemplated under the DAA Principles in any region.

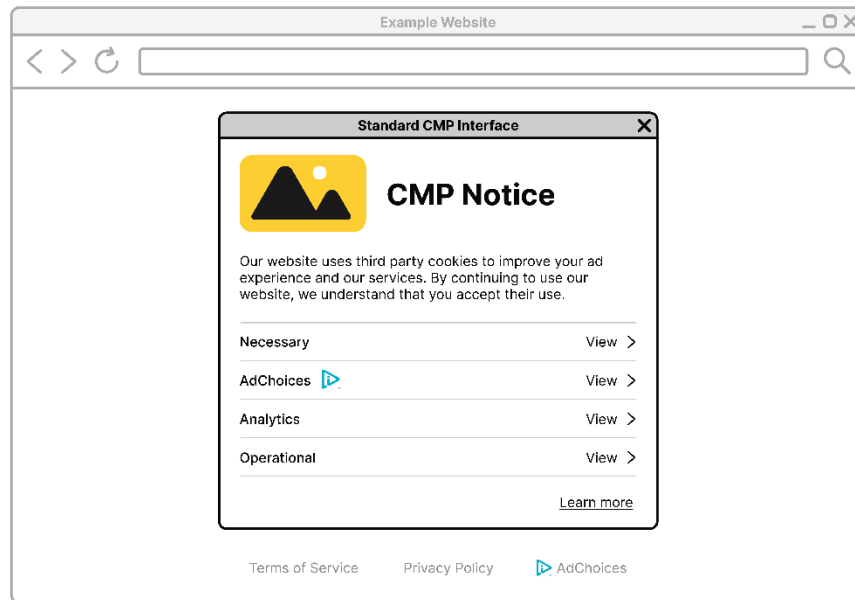
Interface Design

It is anticipated that DAA Recognized CMPs may deploy a module, user flow or other interface, within their larger interface, dedicated to AdChoices. But it is acknowledged that there may be use cases and design presentations in which it may be preferable to provide a separate user flow which provides functionally the same experience to the consumer.

How Consumers Interact with the Interface

Using the AdChoices Icon in the footer of a website, or the "hamburger" menu of an app, CMPs will bring individuals to a module, user flow, or interface dedicated to AdChoices within their larger CMP interface.

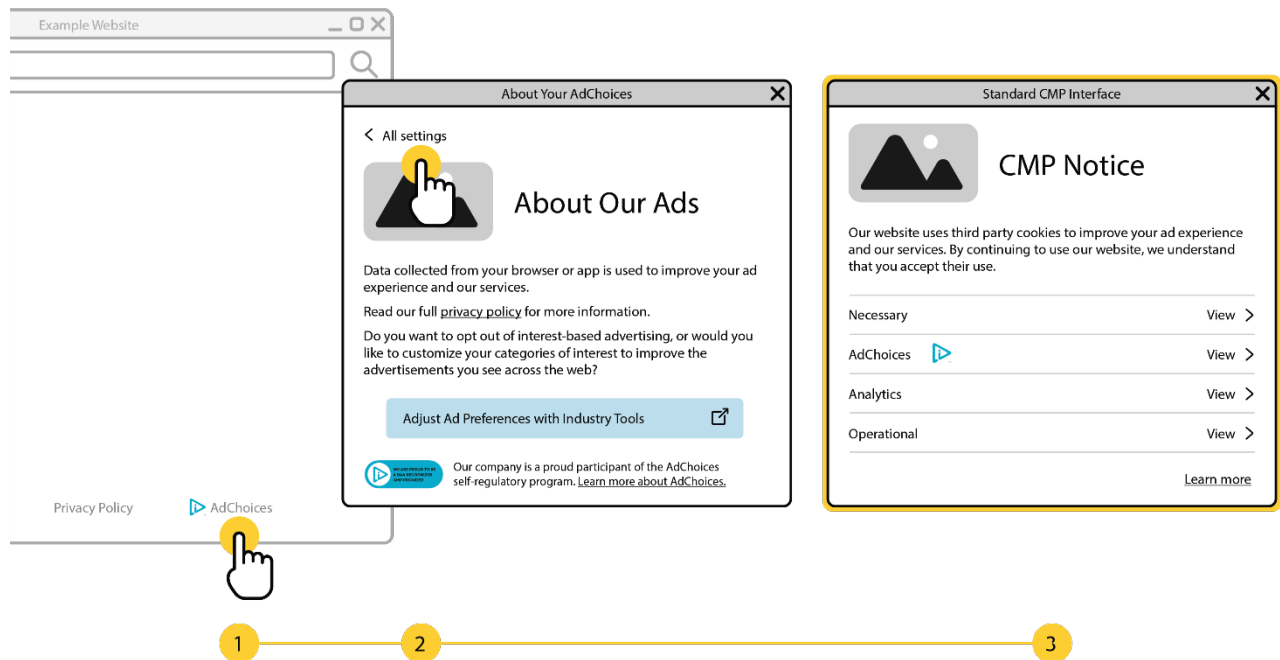
The enhanced notice that brings consumers to this module, user flow, or interface must not be obscured or hidden in any way. It should always be functional and available for individuals to interact within the CMP experience.



An example of a visitor seeing a CMP notice alongside AdChoices in the footer of a website. Note how the CMP notice does not cover or obscure AdChoices. The example also has AdChoices called out within the CMP interface itself.

Prompting or Re-Prompting a CMP Using the AdChoices Icon

The AdChoices Icon can also act to prompt or re-prompt the CMP to allow the consumer to make interest-based advertising (IBA) and/or other choices outside of IBA or site-by-site choices.

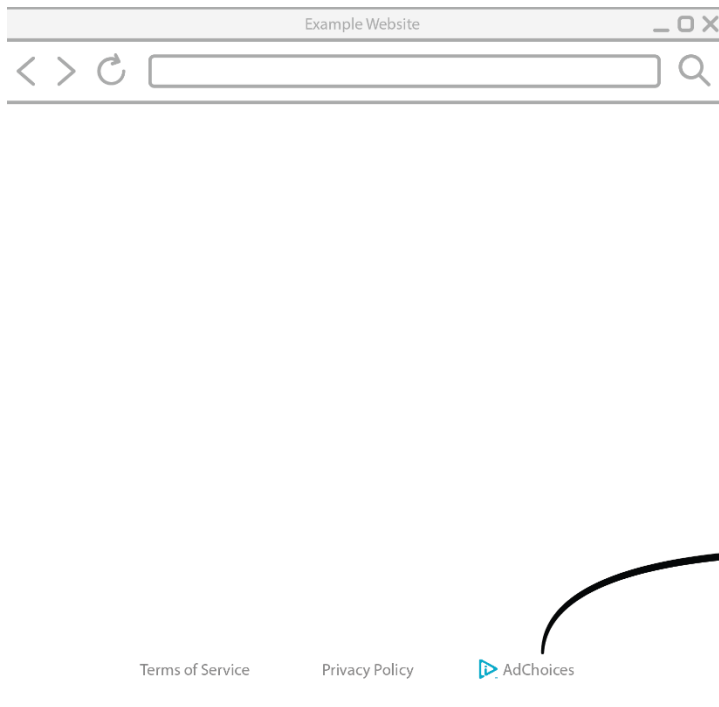


A typical user flow is illustrated above. The consumer clicks on the AdChoices Icon to be brought to a dedicated AdChoices interface. From this interface they can be brought into the broader CMP settings.

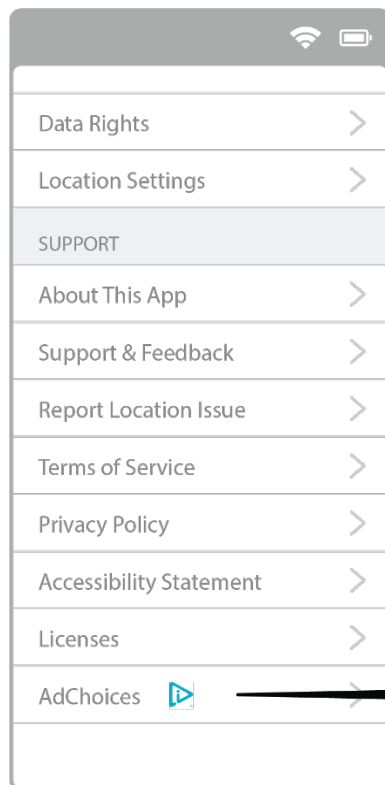
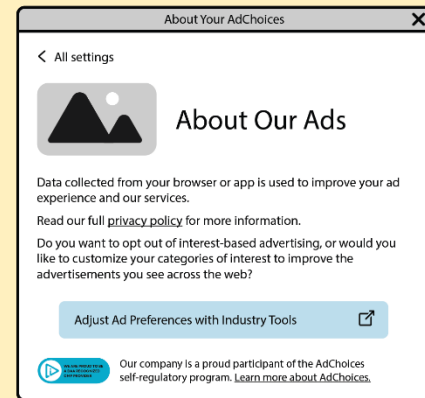
The AdChoices Icon acts as a continuous reminder to consumers about where to go to find industry-wide controls and complements any CMP/banner which may appear at variable frequencies to a consumer visiting a site or app.

Direction to AdChoices Within a CMP

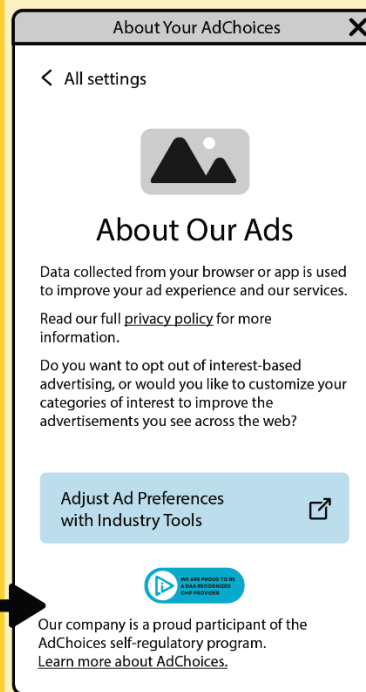
In the relevant use cases, DAA Recognized CMPs would direct consumers who have prompted/re-prompted the CMP/cookie banner via the AdChoices Icon to an interface within the larger CMP/cookie banner **specifically to the area which discusses relevant advertising practices and choices**. To be clear, this would be different from sections dedicated to other uses of technology on the page/app (e.g., measurement, required cookies, etc.). Examples below:



Broader Consent Management Platform (CMP) Interface



Broader Consent Management Platform (CMP) Interface



AdChoices Signal Integration via CMP

DAA Recognized CMPs can be granted access to an AdChoices Signal for consumer choices completed on the DAA choice tools for newer identifier types (e.g., DAA's Token Opt-Out/Revocation tool). If a signal is found, the status of that signal may be displayed to the consumer within the CMP AdChoices interface.

Receiving this signal from DAA allows a path for DAA Recognized CMPs to persist consumer choices from the DAA Token Tools across their CMP network of sites/apps.

As this is a complex use case, please [contact us](#) for more information on how this integration can work. We strongly encourage voluntary testing of this use case.

AdChoices Interface Implementation Guide

Accessing the Interface

Upon clicking or tapping on the AdChoices Icon found in the footer of a participant's website, within a cookie banner, or the hamburger menu of an app, or, potentially, as a QR code or other such link in an on-device context, the AdChoices module within a CMP can display a participant-specific disclosure about relevant advertising which align with the DAA Principles in the consumer's geography. The information within the interface should be kept up-to-date and accurate. Access to this interface should be available to the user at any time.

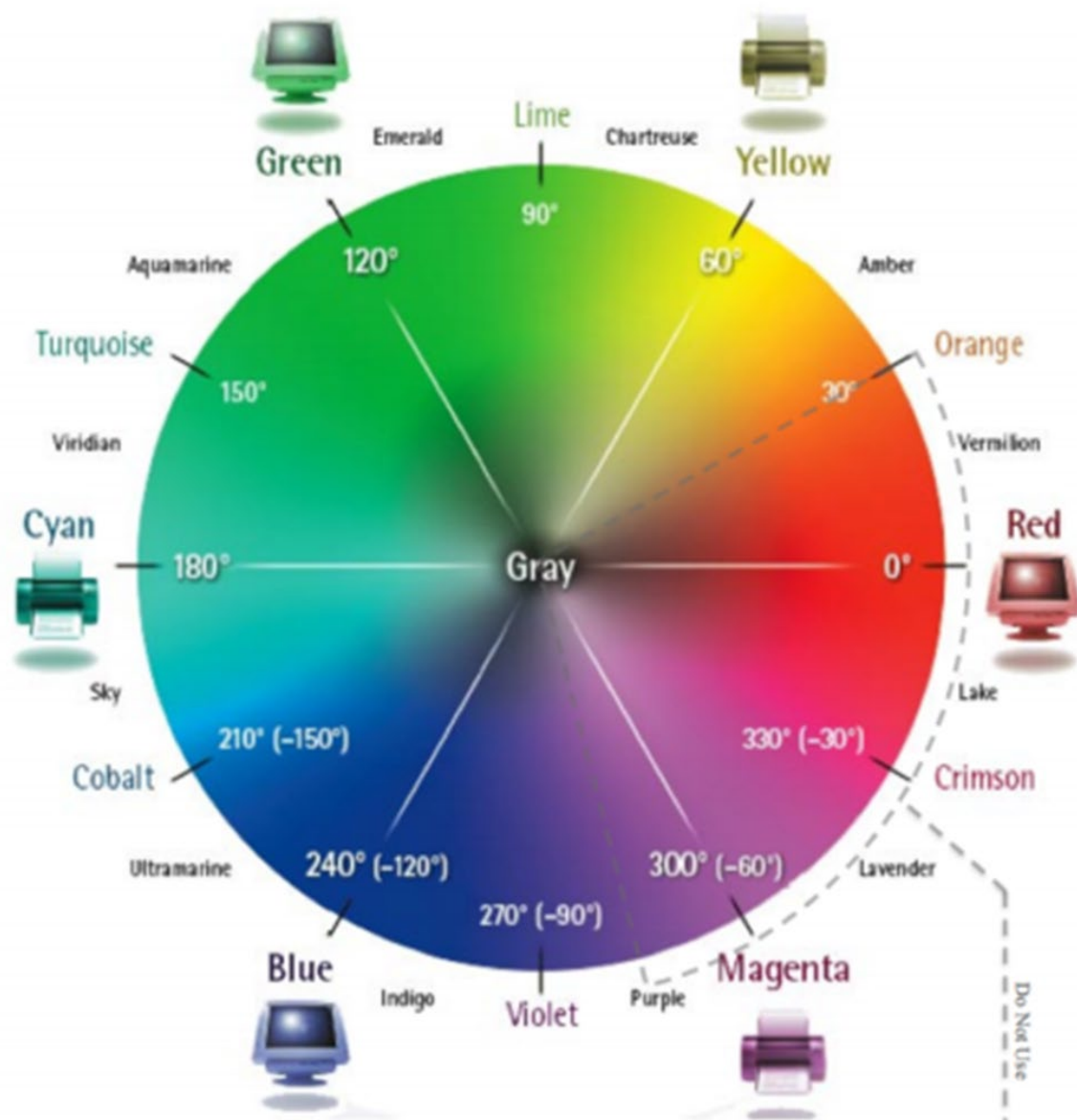
Functionality

The AdChoices interface should:

- Be branded consistent with the participant's website/app/on-device context.
- Provide a summary of the participant's IBA practices, with copy/links to the section of the organization's privacy policies or other relevant advertising policies directly relating to IBA practices and choices.
- Display a link or button that directs/surfaces the DAA's choice mechanism(s) for the consumer, such as the Token ID-Based Choices Tool. The link should be relevant to the consumer's jurisdiction (US, Canada, Europe, Argentina, etc.).

- Display a statement/link that the First Party participates in the AdChoices self-regulatory program and adheres to the program's Principles. This statement may link to the relevant DAA's participating page/tool.
- In instances where the consumer may be brought to a separate tool (such as to the DAA's website), there should be an indication that a new window will be opened to take them there. This is envisioned as a passive feature and should not add friction to the consumer choice process.
- A link or button that prompts/re-prompts the more extensive consent management interface (if applicable). This linkage allows the consumer to change their preferences with that program participant on a site-by-site basis and for other technical uses.
- Offer an X in the top corner of the AdChoices interface to close it out - this should follow the UI of the larger CMP.

Icon Color Spectrum Wheel



The DAA icon must NOT be presented in any color in the red or pink spectrum, which includes any color in the range of +30° and -75° on the color spectrum wheel above.