



IAB Canada Transparency & Consent Framework Policies

- This document lays out the Policies applicable to participants in the IAB Canada Transparency & Consent Framework.
- Participants may include Publishers, advertisers, Vendors, and/or CMPs. Each category of participant has specific obligations and requirements which are included in these Policies.
- Participants must adhere to these Policies to maintain their participation in the Framework.
- Participants must not amend, supplement, or modify their implementation of the Framework unless expressly provided for in the Policies or Specifications.
- Participants must comply with Canadian Privacy Law. In the event of a conflict between applicable law and the Policies, the law prevails.
- Participants should avoid profiling or categorizing individuals in a way that leads to unfair, unethical or discriminatory treatment contrary to human rights law.

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Preamble

- i. The Transparency and Consent Framework consists of a set of technical specifications and policies to which Publishers, advertisers, technology providers, and others for whom the Framework is of interest may voluntarily choose to adhere.
- ii. The goal of the Framework is to help players in the online ecosystem comply with the transparency and consent requirements under Canadian Privacy Law. The Framework sets out a way of providing notice to users the collection, use and disclosure of their Personal Information, the purposes for which their Personal Information is collected, used, or disclosed, and the companies that are seeking to collect, use, or disclose their Personal Information for these purposes. The Framework also sets out an approach for user choice, and Signals to third parties *inter alia* which information has been disclosed to users and what users' choices are.
- iii. Achieving the goals of the Framework requires standardization of technology, for example of how information is disclosed or how user choices are stored and signaled to participants. It also requires standardizing certain notice provided to users, choices given to users, and behaviours that participants engage in when interacting with users or responding to requests between participants.
- iv. The Framework is not intended, nor has it been designed to facilitate the lawful collection, use, or disclosure of sensitive Personal Information except where defined under Special Purposes.
- v. While participation in the Framework may be a useful and essential building block for the online ecosystem's compliance with Canadian Privacy Law, it is not a substitute for individual participants taking responsibility for their respective obligations under the law and seeking consultation and advice of in-house or external legal counsel in connection therewith. Such in-house or external legal advice would canvass jurisdictional specific considerations, including how a participant would choose to implement the Framework in a manner consistent with the requirements under Law 25 in the Province of Quebec and applicable privacy regulatory authority guidance.
- vi. The Framework should only be used for the collection of Personal Information to the extent that this Personal Information is necessary to achieve the purposes disclosed by participants.
- vii. The Framework is intended to be updated over time as legislation is updated, and legal requirements, regulatory practice, business practices, business needs and other relevant factors change.

Chapter I: Definitions

1. Definitions

1. “**Canadian Privacy Law**” means any federal or provincial private or public sector privacy legislation which govern the collection, use and disclosure of Personal Information including the *Personal Information Protection and Electronic Documents Act* (PIPEDA), *Act respecting the protection of personal information in the private sector* of Quebec (Law 25), *Personal Information Protection Act* of Alberta (PIPA Alberta), *Personal Information Protection Act* of British Columbia (PIPA BC) or the *Privacy Act*, as amended.
2. “**Digital Property**” means a website, app, or other content or service delivery mechanism where digital ads are displayed, or information is collected and/or used for any Purpose or Special Purpose.
3. “**Feature**” means one of the features for which Personal Information is used by participants in the Framework that are defined in the Policies or the Specifications used in pursuit of one or several Purposes for which the user is not given choice separately to the choice afforded regarding the Purposes for which they are used
4. “**Framework Policies**” (the “**Policies**”) means this or any other official policy documentation disseminated by IAB Canada and updated from time to time, that defines the requirements for compliant participation in, and use of, the Framework, including, but not limited to, Appendix A and Appendix B of these Policies, and any associated policy guidance, or publicly communicated, enforcement actions.
5. “**Framework UI**” (“**UI**”) means the user interface or user experience defined by the Specifications for presentation to a user in order to establish Permissions for GVL Vendors as part of their compliance with Canadian Privacy Law. The Policies and Specifications define requirements for the UI along with aspects that are configurable by Publishers.
6. “**Framework Specifications**” (the “**Specifications**”) means any official technical documentation disseminated by IAB Canada in concert with IAB Tech Lab or future designated technical body, and updated from time to time, that defines the technical implementation of the Framework, including, but not limited to, the Transparency and Consent String with Global Vendor List Format specification, the Consent Management Platform API specification, and any associated implementation guidance.
7. “**Global Vendor List**” (the “**GVL**”, or the “**Vendor List**”) means the list of Vendors who have registered with IAB Canada for participating in the Framework. The list is managed and maintained by IAB Canada, and is referenced by CMPs, Publishers and individual Vendors. Its structure and content shall be defined by the Specifications.
8. “**Initial Layer**” refers to information that must be made visible to the user in the UI prior to the user being able to give his or her consent. For the avoidance of doubt, the use of

the term “visible” should not be understood as excluding other forms of information presentation used, for example, for assisted internet access, or on devices with non-visual user interfaces.

9. **“Interactive Advertising Bureau of Canada” (“IAB Canada”, the “Managing Organization”, or the “MO”)** means the entity that manages and governs the Framework, including the Policies, Specifications, and the Global Vendor List. IAB Canada may update these Policies from time to time as it reasonably determines is necessary to ensure the ongoing success of the Framework. IAB Canada may designate a third party or third parties to take on certain functions and/or tasks of the MO under the Framework on its behalf
10. **“Objection”** means an action taken by the user in a Framework UI to indicate their objection to the collection, use, or disclosure of their Personal Information by Vendors. An Objection Signal may also be set by CMPs under the instruction of Publishers to give effect to a Publisher restriction.
11. **“Permission”** means a permission for collecting, using, or disclosing Personal Information under the Framework, using either express or implied consent as required in accordance with Canadian Privacy Law. Permissions in the Framework can be established with:
 - (a) Service-specific scope, which means a Permission is applicable only to the service (e.g. Permission is obtained and managed for a Publisher website or app);
 - (b) Group-specific scope, which means a Permission is applicable only on a pre-defined group of services (e.g. a number of Digital Properties of one or more Publishers that implement CMPs with their group’s scope, each of which allows users to manage their choices regarding Permissions established for the group across all the services of the group); or
 - (c) Out-of-band (“OOB”), which means a Permission has not been established using the Framework, is not reflected in any Signals within the Framework, and cannot be managed by users within the Framework.
12. **“Personal Information”** refers to any information that deemed to be personal information under Canadian Privacy Law.
13. **“Precise Geolocation Data”** means information about a user’s geographic location accurate to up to 500 meters and/or latitude and longitude data beyond two decimal points
14. **“Publisher”** means an operator of a Digital Property and who is primarily responsible for ensuring the Framework UI is presented to users and that Permissions are established with respect to Vendors that may process Personal Information based on users’ visits to the Publisher’s Digital Property.
15. **“Purpose”** means one of the defined purposes for which Personal Information is collected, used, or disclosed by participants in the Framework that are defined in the Policies or the Specifications for which Vendors seek Permission and for which the

user is given choice, i.e., to seek Permission to collect, use or disclose Personal Information.

16. **“Signal”** means any signal defined by the Policies or Specifications sent by a CMP, usually on behalf of a Publisher, to Vendors that includes Permission information, e.g., information about the transparency, and/or Permission status of a Vendor and/or Purpose, the Permission status of a Special Feature, and Publisher restrictions.
17. **“Special Feature”** means one of the features for which Personal Information is used by participants in the Framework that are defined in the Policies or the Specifications, used in pursuit of one or several Purposes for which the user is given the choice to give their express consent (e.g. collection, use or disclosure of Precise Geolocation Data) [separately from the choice afforded regarding the other Purposes for which they are used].
18. **“Special Purpose”** means one of the defined purposes for collecting, using, or disclosing of Personal Information by participants in the Framework that are defined in the Policies or the Specifications, for which Vendors collect, use or disclose Personal Information and for which the user is not given choice by a CMP because the collection, use or disclosure may occur without consent under Canadian Privacy law.
19. **“Stack”** means one of the combinations of Purposes and/or Special Features for which Personal Information is collected, used, or disclosed by participants in the Framework that may be used to substitute or supplement more granular Purpose and/or Special Feature descriptions in the Initial Layer of a UI.
20. **“Transparency and Consent Framework”** (the **“Framework”**, or the **“TCF”**) means the Framework comprising the various parts defined under these Policies. It has the objective to help all parties in the digital advertising chain to comply with Canadian Privacy Law when collecting, using, or disclosing Personal Information.
21. **“Transparency and Consent Management Platform”** (**“Consent Management Platform”**, or **“CMP”**) means the company or organization that centralizes and manages transparency for, and consent and revocations of consent of the end user. The CMP can read and update the Permission status of Vendors on the GVL, and acts as an intermediary between a Publisher, an end user, and Vendors to provide transparency, help Vendors and Publishers establish Permissions for collecting, using, or disclosing Personal Information, acquire user consent as needed and manage user revocations, and communicate Permissions 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 own purposes. A commercial CMP offers CMP services to other parties. Unless specifically noted otherwise, these policies apply to both private and commercial CMPs
22. **“Vendor”** means a company that participates in the delivery of digital advertising within a Publisher’s website, app, or other digital content, to the extent that company is not acting as a Publisher or CMP, and that either accesses an end user’s device or collects, uses, or discloses Personal Information about end users visiting the Publisher’s content and adheres to the Policies.

Chapter II: Policies for CMPs

2. Applying and Registering

1. CMPs must apply to IAB Canada for participation in the Framework. IAB Canada shall take reasonable steps to vet and approve a CMP's application according to procedures adopted, and updated from time to time, by the MO.
2. CMPs must provide all information requested by IAB Canada that is required to fulfil IAB Canada's CMP application and approval procedures.
3. IAB Canada shall not approve a CMP's application unless and until IAB Canada can verify to its satisfaction the identity of the party or parties controlling the CMP, as well as the CMP's ability to maintain its service and adhere to the Policies and Specifications.

3. Adherence to Framework Policies

1. A CMP must adhere to all Policies applicable to CMPs that are disseminated by the MO in the Policies or in documentation that implements the Policies, such as in operating policies and procedures, guidance, and enforcement decisions.
2. A CMP must make a public attestation of compliance with the Policies in a prominent disclosure, such as in a privacy policy. This attestation must at minimum include: (i) an affirmation of the CMP's participation in the IAB Canada Transparency & Consent Framework; (ii) an affirmation of its compliance with the Policies and Specifications of the Transparency & Consent Framework;

(iii) the IAB Canada-assigned ID of the CMP. Example:

<Organization> participates in the IAB Canada Transparency & Consent Framework and complies with its Specifications and Policies. <Organization> operates Consent Management Platform with the identification number <CMP ID>.

4. Adherence to the Specifications

1. In addition to implementing the Framework according to the Specifications, a CMP must support the full Specifications, unless the Specifications expressly state that a feature is optional, in which case a CMP may choose to implement the optional feature but need not do so.
2. A private CMP need only implement the Specifications to the extent necessary to support the needs of the Vendors, Purposes, and Special Features selected by its Publisher owner.
3. A CMP must disclose Vendors' GVL information, including Permissions sought, as declared, and update Vendors' GVL information, including Permission status in the Framework, wherever stored, according to the Specifications, without extension, modification, or supplementation, except as expressly allowed for in the Specifications.

4. A CMP must not read, write, or communicate any Vendor's Permissions except according to and as provided for under the Specifications, and using the standard API.

5. Managing Purposes and Permissions

1. A CMP will remind the user of their right to withdraw consent for the collection, use, or disclosure of their Personal Information at least every 18 months with respect to any Vendor and Purpose.
2. A CMP must resolve conflicts in Signals or merge Signals before transmitting them in accordance with the Policies and Specifications.
3. A CMP must only generate a positive express consent Signal on the basis of a clear action taken by a user that signifies that user's agreement on the basis of being provided appropriate notice about the collection, use, or disclosure of their Personal Information and in accordance with Canadian Privacy Law.
4. A CMP must only generate an Objection Signal on the basis of an action taken by a user to signify that user's Objection to the collection, use or disclosure of their Personal Information in accordance with Canadian Privacy Law, or where the CMP is instructed by the Publisher to give effect to a Publisher restriction. For the avoidance of doubt, the absence of an Objection Signal indicates the user's Permission on the basis of implied consent[or the continuing validity of an express consent, as applicable].
5. A CMP must only generate a express consent Signal for Special Features on the basis of a clear action taken by a user that signifies that user's agreement on the basis of being provided appropriate notice about the collection, use, and disclosure of Personal Information in accordance with Canadian Privacy Law.
6. A CMP will establish Permissions only in accordance with the declarations made by Vendors in the GVL and using the definitions of the Purposes and/or their translations found in the GVL, without extension, modification, or supplementation, except as expressly allowed for in the Policies.
7. A CMP must resurface the Framework UI if the MO indicates, in accordance with the Policies and Specifications, that changes to the Policies are of such a nature as to require re-establishing Permissions.
8. A CMP may be instructed by its Publisher which Purposes, Special Features, and/or Vendors to disclose. If a Publisher instructs a CMP not to disclose a Purpose, Special Feature, and/or a Vendor, the Signals the CMP generates must appropriately reflect in the Signal that no Permissions have been established for the respective Purposes, Special Features, and/or Vendors. For the avoidance of doubt: Special Purposes, and Features must always be disclosed if at least one of the Vendors disclosed has declared itself using them.
9. A CMP must implement any Publisher restrictions, such as a restriction of Purposes per Vendors, by making appropriate changes in the User Interface to reflect such

restrictions, and by creating the appropriate Signals containing the Publisher restrictions in accordance with the Policies and Specifications. For the avoidance of doubt: Objection Signals must be generated if no Permissions can be established on the basis of implied consent for the respective Purposes and/or Vendors which are subject to Publisher restrictions.

10. A CMP may be instructed by its Publisher to establish, record and transmit information about its own Permissions (that is, Permissions for collecting, using, or disclosing Personal Information by the Publisher), including Permissions for Purposes that are not supported by the Framework. A CMP is prohibited from implementing Publisher-specific custom Permission Signals for Purposes that the Framework covers, or for any Vendors rather than Purposes. Management of Permissions that the Framework covers shall only take place if the Vendor has registered with the MO in accordance with the Policies. A CMP may exclusively implement Publisher-specific custom Permission Signals in conjunction with the Publisher's own collection, use, or disclosure of Personal Information or for collecting, using, or disclosing Personal Information on its behalf by a Vendor who processes such Personal Information under applicable Canadian Privacy Law and only for Purposes not standardized by the Framework.

6. Working with Vendors

1. If a CMP works with Vendors who are not participating in the Framework and who are not published on the GVL, the CMP must make it possible for users to distinguish between those Vendors who are participating in the Framework, on the one hand, and those who are not, on the other. CMPs must not misrepresent Vendors who are not registered with IAB Canada as participating in the Framework and being published on the GVL.
2. If a Publisher or Vendor operates a CMP, the Policies for CMPs shall apply only to the extent of that party's CMP operation. For example, if a Publisher operates a CMP, the prohibition against a CMP discriminating against Vendors shall apply to the Publisher's CMP only, while the Publisher remains free to make choices with respect to Vendors appearing on its Digital Properties.
3. In any interaction with the Framework, a CMP may not exclude, discriminate against, or give preferential treatment to a Vendor except pursuant to explicit instructions from the Publisher involved in that interaction and in accordance with the Specifications and the Policies. For the avoidance of doubt, nothing in this paragraph prevents a private CMP from fully implementing instructions from its Publisher owner.
4. If a Vendor operates a CMP, it may require a Publisher to work with its Vendor-owner as part of the terms and conditions of using the CMP. Such a requirement shall not constitute preferential treatment in the meaning of Policy 6(3).
5. If a CMP reasonably believes that a Vendor is not in compliance with the Specifications and/or the Policies, it must promptly notify IAB Canada according to MO procedures and may, as provided for by MO procedures, pause working with the Vendor while the matter is addressed.

7. Working with Publishers

1. A CMP shall only work with Publishers within the Framework that are in full compliance with the Policies, including but not limited to the requirement to make an attestation of compliance in a prominent location, such as a privacy policy.
2. A CMP is responsible for ensuring that its UIs and Signals comply with the Policies and Specifications. Where a commercial CMP is not able to ensure such compliance, for example because it offers Publishers the option to customize aspects that may impact compliance, the Publisher using such customization options must assume responsibility for compliance with the Policies for CMPs, register a private CMP within the Framework, and use the commercial CMPs offering in association with the Publisher's assigned private CMP ID.
3. If a CMP reasonably believes that a Publisher using its CMP is not in compliance with the Specifications and/or the Policies, it must promptly notify IAB Canada according to MO procedures and may, as provided for by MO procedures, pause working with the Publisher while the matter is addressed. For the avoidance of doubt, where a commercial CMP receives an instruction from a Publisher that is in violation of these Policies, the CMP shall not act on the instruction.
4. The MO may prevent a Publisher from participation in the Framework for violations of Framework Policies that are willful and/or severe according to MO procedures. The MO may enact a suspension or block of a Publisher by notifying CMPs that the Publisher is not in full compliance.

8. Record Keeping

1. A CMP will maintain records of all Permissions and will provide the MO access to such records upon request without undue delay.
2. A CMP will retain a record of the UI that has been deployed on any given Publisher at any given time and make this record available to its Publisher client, Vendors, and/or the MO upon request.

9. Accountability

1. IAB Canada shall take reasonable steps to periodically review and verify a CMP's compliance with the Policies and/or the Specifications according to procedures adopted, and updated from time to time, by the MO. A CMP will provide, without undue delay, any information reasonably requested by IAB Canada to verify compliance.
2. IAB Canada may suspend a CMP from participation in the Framework for any failure to comply with the Policies and/or the Specifications until the CMP comes into full compliance and demonstrates its intention and ability to remain so to the MO's satisfaction. The MO may expel a CMP from participation in the Framework for violations of Policies that are willful and/or severe.
3. Additionally, IAB Canada may, at its discretion and according to MO procedures, take

additional actions in response to a CMP's non-compliance, including publicly communicating the CMP's non-compliance and reporting the non-compliance to the federal or provincial Privacy Regulator's Office, as the case may be.

Chapter III: Policies for Vendors

10. Applying and Registering

1. Vendors must apply to IAB Canada for participation in the Framework. IAB Canada shall take reasonable steps to vet and approve a Vendor's application according to procedures adopted, and updated from time to time, by the MO.
2. Vendors must provide all information requested by the MO that is reasonably required to fulfil the MO's application and approval procedures.
3. Vendors must have all legally required disclosures in a prominent, public-facing privacy policy on their websites.
4. The MO will not approve a Vendor's application unless or until the MO can verify to its satisfaction the identity of the party or parties controlling the Vendor, as well as the Vendor's ability to maintain its service and adhere to the Framework Policies.
5. A Vendor will provide to the MO, and maintain as complete and accurate, all information required for inclusion in the GVL, according to the GVL Specifications. This includes the Purposes and Special Purposes for which it collects, uses, or discloses Personal Information, the forms of consent it relies on to establish Permissions towards each Purpose and Special Purpose, and the Features and Special Features it relies on in pursuit of such Purposes and Special Purposes. It will ensure its Purposes, Special Purposes, Features, Special Features and Forms of Consent are completely and accurately included in the GVL. It will notify the MO of any changes in a timely manner.

11. Adherence to Framework Policies

1. A Vendor must adhere to all Policies applicable to Vendors that are disseminated by the MO in this document or in documentation that implements the Policies, such as in operating policies and procedures, guidance, and enforcement decisions. See Accountability below regarding enforcement.
2. A Vendor must make a public attestation of compliance with the Policies in a prominent disclosure, such as in a privacy policy. This language must at a minimum include: (i) participation in the IAB Canada Transparency & Consent Framework; (ii) compliance with the Policies and Specifications with the Transparency & Consent Framework; (iii) the IAB Canada assigned ID that the Vendor uses. Example:

<Organization> participates in the IAB Canada Transparency & Consent Framework and complies with its Specifications and Policies. <Organization>'s identification number within the framework is <Vendor ID>.

12. Adherence to the Specifications

1. In addition to implementing the Framework only according to the Specifications, a Vendor must support the full Specifications, including being able to retrieve and/or pass on Signals in the technical formats required by the Specifications and in accordance with Policies, when available.

13. Working with CMPs

1. A Vendor shall work with a CMP within the Framework only if the CMP is in full compliance with the Policies, including but not limited to the requirements to register with IAB Canada, and to make a public attestation of compliance.
2. If a Vendor reasonably believes that a CMP is not in compliance with the Specifications and/or the Policies, it must promptly notify IAB Canada according to MO procedures and may, as provided for by MO procedures, pause working with the CMP while the matter is addressed.
3. A Vendor must respect Signals communicated by a CMP or received from a Vendor who forwarded the Signal originating from a CMP in accordance with the Specifications and Policies, and act accordingly. A Vendor must respect Signals on an individual basis in real-time and must not rely on a stored version of a previously received Signal to process Personal Information for any Purpose and/or use any Special Feature where a more recent Signal has been received by that Vendor.
4. If a Vendor is unable to read or process the contents of a received Signal, the Vendor must assume that it does not have Permission to collect, use, or disclose Personal Information for any Purpose and/or Special Feature.
5. If a Vendor is unable to act in accordance with the contents of a received Signal, the Vendor must not collect, use, or disclose Personal Information for any Purpose and/or Special Feature.
6. By way of derogation of Policy 13(4) and Policy 13(5), a Vendor may, subject to their own interpretation of Canadian Privacy Law, presume it has Permission to collect, use, or disclose Personal Information for any Purpose provided that:
 - i. the Vendor independently confirms the express or implied consent for the Purpose, and;
 - ii. the Vendor has not received any Signal indicating an Objection.

For the avoidance of doubt: independent confirmation by a Vendor of its implied consent constitutes an OOB Permission and can only be used within the Framework in accordance with Policy 16 (13) and 16 (14), and applicable Canadian Privacy Law.

7. A Vendor must not create Signals where no CMP has communicated a Signal and shall only transmit Signals communicated by a CMP or received from a Vendor who forwarded a Signal originating from a CMP without extension, modification, or supplementation, except as expressly allowed for in the Policies and/or Specifications.

14. Working with Publishers

1. A Vendor shall work with a Publisher within the Framework only if the Publisher is in full compliance with the Policies, including but not limited to the requirement to make a public attestation of compliance.
2. If a Vendor reasonably believes that a Publisher is not in compliance with the Specifications and/or the Policies, it must promptly notify IAB Canada according to MO

procedures and may, as provided for by MO procedures, pause working with the Publisher while the matter is addressed.

3. For the avoidance of doubt, contractual obligations that a Vendor is subject to with respect to the use of Personal Information override more permissive Signals for that Vendor about permissions to that Personal Information.
4. A Vendor must update its software for use by its Publisher and Vendor partners, such as scripts and tags that result in the collection, use, or disclosure of Personal Information to ensure compliance with the Specifications, and/or the Policies. In particular, the requirement to not collect, use, or disclose Personal Information prior to verifiably receiving a Permission for collection, use, or disclosure of Personal Information as communicated by the appropriate Signal in accordance with the Policies and Specifications.
5. A Vendor shall update software provided by its Vendor partners present on its services, such as scripts and tags that result in the collection, use, or disclosure of Personal Information, if the Vendor partner has provided updated software for the purpose of complying with the Specifications and/or the Policies.

15. Demonstrating Permissions

1. A Vendor must be able to demonstrate Permissions, either by maintaining records of Permissions granted by users, or an equivalent mechanism designed to demonstrate that Permissions have been obtained in a manner compliant with the Policies and the Specifications, and will provide the MO access to such records upon request without undue delay.
2. A Vendor must maintain records of user identification, timestamps, and received Signals for the full duration of the relevant collection, use, or disclosure of Personal Information. A Vendor may additionally choose to maintain such records of user identification, timestamps, and Signals beyond the duration of the collection, use, or disclosure of Personal Information as required to comply with legal obligations or to reasonably defend or pursue legal claims, and/or for other collection, use, or disclosure allowed by law consistent with the Purposes for which the Personal Information was originally collected or received.
3. By way of derogation of Policy 15(2), a Vendor may choose to demonstrate Permissions through an equivalent mechanism, provided that such equivalent mechanism is capable of demonstrating that the Vendor complies with the Policies and Specifications with regard to reading and respecting Signals.

16. Purposes, Special Purposes, Features, and Special Features

1. A Vendor must not collect, use, or disclose Personal Information relating to a user without a Permission to do so.
2. A Vendor shall indicate on the GVL:
 - (a) that it seeks Permission under the Framework to collect, use, or disclose Personal Information toward a Purpose;

- (b) the form(s) of consent it seeks to establish Permission to collect, use, or disclose Personal Information toward a Purpose, specifically whether it wishes to rely on:
 - i. Express consent as its sole form of consent
 - ii. Implied consent as its sole form of consent
 - iii. Express consent or implied consent as a form of consent, selected in accordance with the Policy and Specifications.
 - (c) the default form of consent to be used by CMPs where the Vendor declares two possible forms of consent under Policy 4(b)(iii).
3. A Vendor shall indicate on the GVL whether it will collect, use, or disclose Personal Information for a Special Purpose.
 4. A Vendor shall indicate on the GVL whether it relies on any Features in support of one or more Purposes and/or Special Purposes.
 5. A Vendor shall indicate on the GVL whether it relies on any Special Features in support of one or more Purposes and/or Special Purposes.
 6. Where a situation falls within the Framework, in addition to complying with relevant Canadian Privacy Law, a Vendor wishing to obtain the user's express consent for the collection, use, or disclosure of his or her Personal Information will only do so if it can verify by way of the appropriate Signal in accordance with the Specifications and Policies that the user has given his or her appropriate consent for collection, use, or disclosure of his or her Personal Information before or at the moment any Personal Information is collected, used, or disclosed.
 7. Where a situation falls within the Framework, in addition to complying with relevant Canadian Privacy Law, a Vendor relying on the user's implied consent for the collection, use, or disclosure of his or her Personal Information will only do so if:
 - (a) it can verify by way of the appropriate Signal in accordance with the Policies and Specifications that the appropriate notice has been provided to the user at the time that the collection, use, or disclosure of his or her Personal Information starts, and;
 - (b) it has not received an Objection Signal to such collection, use, or disclosure of his or her Personal Information in accordance with the Policies and Specifications.
 8. Where a situation falls within the Framework, in addition to complying with relevant Canadian Privacy Law, a Vendor wishing to make use of a Feature will only do so if it has indicated on the GVL its use of the Features it wishes to rely on in support of one or more Purposes and/or Special Purposes.
 9. By way of derogation of Policy 16(8), and subject to relevant Canadian Privacy Law, a Vendor may receive and use automatically sent device characteristics for identification without having indicated on the GVL its use of the Feature to receive and use automatically sent device characteristics for identification to:
 - (a) Collect, use, or disclose the identifiers obtained through automatically sent

device characteristics for identification for the Special Purpose of ensuring security, preventing fraud, and debugging provided that:

- (i) the Vendor has conducted a privacy impact assessment for the collection, use, or disclosure of identifiers obtained through automatically sent device characteristics for identification collected, used, or disclosed under this derogation;
- (ii) the Vendor actively minimizes collection, use, or disclosure of identifiers obtained through automatically sent device characteristics for identification collected, used, or disclosed under this derogation;
- (iii) the Vendor puts in place reasonable retention periods for the identifiers obtained through automatically sent device characteristics for identification collected, used, or disclosed under this derogation;
- (iv) the Vendor only retains the identifiers obtained through automatically sent device characteristics for identification collected, used, or disclosed under this derogation in an identifiable state for as long as is necessary to fulfil the Special Purpose of ensuring security, preventing fraud, and debugging;
- (v) the Vendor erases the Personal Information associated with identifiers obtained through automatically sent device characteristics for identification collected, used, and/or disclosed under this derogation as soon as possible; and
- (vi) the data associated with identifiers obtained through automatically sent device characteristics for identification collected, used, or disclosed under this derogation is never used for any other Purposes and/or Special Purposes. The prohibition of change of Purpose of the collecting, using, or disclosing of data associated with identifiers obtained through automatically-sent device characteristics for identification under this derogation does not preclude a Vendor from indicating on the GVL its use of the Feature to use automatically-sent device characteristics for identification at a later time and associating data with such identifiers for other Purposes and/or Special Purposes after having made the indication. However, the prohibition does not permit using any data associated with the identifier for the Special Purpose of ensuring security, preventing fraud, and debugging that has occurred under this derogation for any other Purposes and/or Special Purposes and, for example, also precludes changing Purpose with the explicit consent of the user.

10. Where a situation falls within the Framework, in addition to complying with relevant Canadian Privacy Law, a Vendor wishing to make use of a Special Feature will only do so with the express consent of the user and if it can verify by way of the appropriate Signal in accordance with the Specifications and Policies that the user has given his or her express consent for the use of the Special Feature before any Special Feature is used by the Vendor, unless provided for by, and subject to, the Policies and/or

Specifications.

11. By way of derogation of Policy 16(10), and subject to Canadian Privacy Law, a Vendor may process Precise Geolocation Data without the express consent of the user to the Special Feature of using Precise Geolocation Data to:
 - (a) immediately render the Precise Geolocation Data into a non-precise state, for example by truncating decimals of latitude and longitude data, without collecting, using, or disclosing the Precise Geolocation Data in its precise state in any other way;
 - (b) process the Precise Geolocation Data for the Special Purpose of ensuring security, preventing fraud, and debugging, provided that
 - (i) the Vendor has conducted a privacy impact assessment for the collection, use, or disclosure of Precise Geolocation Data collected, used, or disclosed under this derogation;
 - (ii) the Vendor actively minimizes collection, use, or disclosure of Precise Geolocation Data collected, used, or disclosed under this derogation;
 - (iii) the Vendor puts in place reasonable retention periods for the Precise Geolocation Data collected, used, or disclosed under this derogation;
 - (iv) only retains the Precise Geolocation Data collected, used, or disclosed under this derogation in an identifiable and/or precise state for as long as is necessary to fulfill the Special Purpose of ensuring security, preventing fraud, and debugging;
 - (v) erases the Precise Geolocation Data collected, used, or disclosed under this derogation as soon as possible; and
 - (vi) the Precise Geolocation Data collected, used, or disclosed under this derogation is never used for any other Purposes and/or Special Purposes. The prohibition of change of Purpose of the collection, use, or disclosure of Precise Geolocation Data collected under this derogation is absolute, and, for example, also precludes changing Purpose with the explicit consent of the user.

12. By way of derogation of Policy 16(10), and subject to Canadian Privacy Laws, a Vendor may actively scan device characteristics for identification without the express consent of the user to the Special Feature of actively scanning device characteristics for identification to:
 - (a) Collect, use, or disclose the identifiers obtained through actively scanning device characteristics for identification for the Special Purpose of ensuring security, preventing fraud, and debugging provided that
 - (i) the Vendor has conducted a privacy impact assessment for the collection, use, or disclosure of identifiers obtained through actively scanning device characteristics for identification collected, used, or disclosed under this derogation;

- (ii) the Vendor actively minimizes collection, use, or disclosure of identifiers obtained through actively scanning device characteristics for identification collected, used, or disclosed under this derogation;
 - (iii) the Vendor puts in place reasonable retention periods for the identifiers obtained through actively scanning device characteristics for identification collected, used, or disclosed under this derogation;
 - (iv) only retains the identifiers obtained through actively scanning device characteristics for identification collected, used, or disclosed under this derogation in an identifiable state for as long as is necessary to fulfil the Special Purpose of ensuring security, preventing fraud, and debugging;
 - (v) the Vendor erases the data associated with identifiers obtained through actively scanning device characteristics for identification collected, used, or disclosed under this derogation as soon as possible;
 - (vi) the data obtained through actively scanning device characteristics for identification collected, used, or disclosed and any data associated with this identifier under this derogation are never used for any other Purposes and/or Special Purposes. The prohibition of change of Purpose of the collection, use, or disclosure of identifiers obtained through actively scanning device characteristics for identification and data associated with this identifier under this derogation does not preclude obtaining a Permission for actively scanning device characteristics for identification at a later time and associating data with such identifiers for other Purposes and/or Special Purposes after having obtained such a Permission. However, the prohibition does not permit using any data associated with the identifier for the Special Purpose of ensuring security, preventing fraud, and debugging that has occurred under this derogation for any other Purposes and/or Special Purposes and, for example, also precludes changing Purpose with the express consent of the user.
13. By way of derogation of Policy 16(6) to 16(8), and Policy 16(10), Vendors may obtain Permissions to collect, use, or disclose Personal Information for one or more Purposes and/or Special Purposes outside of the Framework, or establish express consent for making use of Special Features outside of the Framework, for collecting, using, or disclosing Personal Information in association with a user's visit to a Publisher that participates in the Framework, so long as the OOB Permissions for collecting, using, or disclosing Personal Information for one or more Purposes, and/or the OOB Permissions for making use of one or more Special Features, are sufficient for such collection, use or disclosure. Use within the Framework of such OOB Permissions established outside of the Framework is subject to Policy 16(14).
14. Where a situation falls within the Framework, a Vendor must not process Personal Information for any Purpose and/or Special Purpose in reliance on Permissions obtained outside of the Framework, nor make use of Special Features in reliance on Permissions established outside of the Framework, for any collection, use, or disclosure in association with a user's visit to a Publisher that participates in the

Framework, unless:

- (a) the Publisher provides notice to users of the possibility that Vendors, whom the Publisher does not disclose directly, may collect, use, or disclose their Personal Information for one or more Purpose, Special Purposes, and/or use one or more Special Feature disclosed by the Publisher in line with an OOB Permission established in previous interactions with those Vendors in other contexts;
 - (b) the user has not interacted with and/or made a choice about the Vendor, for example by giving or refusing consent, and the Vendor does not collect, use, or disclose any Personal Information on the basis of an OOB Permission for any
 - (i) Purpose for which the user has refused or withdrawn Permission within the Framework;
 - (ii) Special Feature for which the user has refused or withdrawn Permission within the Framework;
 - (c) the Vendor is able to verify by way of the appropriate Signal, in accordance with the Specifications and Policies, that the requirements of Policy 16(14)(a)-(c) for relying on OOB Permissions are met; and
 - (d) the Vendor is able to demonstrate that it has obtained Permission outside of the Framework for use in the Framework by keeping appropriate records other than a mere contractual obligation requiring a third party to organize valid Permissions on its behalf, and will make such records available to the MO without undue delay upon request.
15. A Vendor must not transmit Personal Information to another Vendor unless the Framework's Signals show that the receiving Vendor has a Permission for the disclosure of the Personal Information. For the avoidance of doubt, a Vendor may in addition choose not to transmit any Personal Information to another Vendor for any reason.
16. By way of derogation of Policy 16(15), a Vendor may transmit Personal Information to another Vendor if it can verify by way of the appropriate Signal in accordance with the Specifications and Policies that the receiving Vendor may process Personal Information on the basis of a Permission established outside of the Framework under Policy 16(13) and 16(14), and it has a justified basis for relying on the recipient Vendor's having a Permission to collect, use, or disclose the Personal Information in question.
17. A Vendor must not transmit a user's Personal Information to an entity outside of the Framework unless it has a justified basis for relying on that entity's having a Permission to collect, use, or disclose the Personal Information in question or is compelled to do so by way of statute, government regulation or judicial order.
18. If a Vendor receives a user's Personal Information without having a Permission for the collection, use, or disclosure of that Personal Information, the Vendor must quickly cease collecting, using, or disclosing the Personal Information and must not further transmit the Personal Information to any other party, even if that party has a Permission to collect, use, or disclose the Personal Information in question.

17. Accountability

1. The MO may adopt procedures for periodically reviewing and verifying a Vendor's compliance with the Policies. A Vendor will provide, without undue delay, any information reasonably requested by the MO to verify compliance.
2. The MO may suspend a Vendor from participation in the Framework for its failure to comply with the Policies until the Vendor comes into full compliance and demonstrates its intention and ability to remain so. The MO may expel a Vendor from participation in the Framework for violations of the Policies that are willful and/or severe.
3. Additionally, the MO may, at its discretion and according to MO procedures, take additional actions in response to a Vendor's non-compliance, including publicly communicating the Vendor's non-compliance and reporting the non-compliance to the Data Protection Authority.

Chapter IV: Policies for Publishers

18. Participation

1. A Publisher may adopt and use the Framework in association with its Digital Property as long as it adheres to the Policies and the Specifications.
2. Publishers must have and maintain all legally required disclosures in a public-facing privacy policy prominently linked from the Digital Property in association with which they are using the Framework.

19. Adherence to Framework Policies

1. In addition to implementing the Framework only according to the Specifications, a Publisher must adhere to all policies applicable to Publishers that are disseminated by the MO in this document or in documentation that implements the Policies, such as in operating policies and procedures, guidance, and enforcement decisions. See Accountability below regarding enforcement.
- (iii) A Publisher must make a public attestation of compliance with the Policies in a prominent disclosure, such as in a privacy policy. This language must at a minimum include: (i) an affirmation of its participation in the IAB Canada Transparency & Consent Framework; (ii) an affirmation of its compliance with the Policies and Specifications with the Transparency & Consent Framework; the IAB Canada assigned ID of the CMP that the publisher uses. Example:

<Organization> participates in the IAB Canada Transparency & Consent Framework and complies with its Specifications and Policies. <Organization> [operates|uses] the Consent Management Platform with the identification number <CMP ID>.

20. Adherence to the Specifications

1. A Publisher must support and adhere to the full Specifications, without extension, modification, or supplementation except as expressly allowed for in the Specifications.
2. A Publisher must not read, write, or communicate any Vendor's Permissions except according to and as provided for under the Specifications, and using the standard API.

21. Working with CMPs

1. A Publisher will work with a CMP within the Framework only if the CMP is in full compliance with the Policies and the Specifications, including but not limited to the requirement for the CMP to register with the MO.
2. If a Publisher reasonably believes that a CMP is not in compliance with the Specifications and/or the Policies, it must promptly notify the MO according to MO procedures and may, as provided for by MO procedures, pause working with the CMP while the matter is addressed.

3. A Publisher may operate a private CMP. A Publisher's private CMP is subject to the Policies for CMPs just as a commercial CMP is, unless expressly stated otherwise in the Framework Policies or the Specifications.

22. Working with Vendors

1. A Publisher may choose the Vendors for which it wishes to provide transparency and help establish Permissions within the Framework. A Publisher may further specify the individual Purposes for which it wishes to help establish Permissions for each Vendor. The Publisher communicates, or instructs its CMP to communicate, its preferences to Vendors in accordance with the Specifications and Policies.
2. A Publisher will, in accordance with the Specifications and Policies, and considering and respecting each Vendor's declarations on the GVL, Signal to Vendors which Permissions it has established on behalf of each Vendor, through the use of its CMP.
3. For the avoidance of doubt, contractual obligations that a Publisher is subject to with respect to the Permissions of a Vendor to use of Personal Information must be reflected in the Signals to align with those contractual obligations.
4. A Publisher may work with Vendors that are not in the GVL but must be careful not to confuse or mislead users as to which Vendors are operating within the Policies.
5. For the avoidance of doubt, contractual obligations that a Vendor is subject to with respect to the use of Personal Information override more permissive Signals for that Vendor about Permissions to that Personal Information.
6. If a Publisher reasonably believes that a Vendor is not in compliance with the Specifications and/or the Policies, it must promptly notify the MO according to MO procedures and may, as provided for by those procedures, pause working with the Vendor while the matter is addressed.
7. A Publisher will undertake to update software present on its services of its Vendor-partners, such as scripts and tags that result in the collection, use, or disclosure of Personal Information, if the Vendor has provided updated software for the purpose of complying with the Specifications and/or the Policies.

23. Managing Purposes and Permissions

1. The Framework does not dictate how Publishers respond to a user's acceptance or rejection of Purposes, Special Features, and/or Vendors.
2. A Publisher using the Framework is required to help establish transparency and Permissions in accordance with the Policies and Specifications.
3. A Publisher may choose which Purposes, Special Features, and/or Vendors to disclose. If a Publisher chooses not to disclose a Purpose, Special Feature, and/or a Vendor, the Signals must appropriately reflect in the Signal that no Permissions have been established for the respective Purposes, Special Features, and/or Vendors. For the avoidance of doubt: Special Purposes, and Features must always be disclosed if at least one of the Vendors disclosed has declared to be using them.

4. A Publisher may restrict certain Purposes for specific Vendors, these restrictions must be implemented by the CMP through the use of the Objection Signal, which shall reflect Publisher restrictions in both the User Interface and the Signals in accordance with the Policies and Specifications.
5. A Publisher must not modify, or instruct its CMP to modify the Purpose, Special Purpose, Feature, or Special Feature names, definitions and/or their translations, or Stack names or their translations.

6. A Publisher must not modify, or instruct its CMP to modify, Stack descriptions and/or their translations unless
 - (a) the Publisher has registered a private CMP with the Framework, or its commercial CMP is using a CMP ID assigned to the Publisher for use with a private CMP;
 - (b) the modified Stack descriptions cover the substance of standard Stack descriptions, such as accurately and fully covering all Purposes that form part of the Stack;
 - (c) Vendors are alerted to the fact of a Publisher using custom Stack descriptions through the appropriate Signal in accordance with the Specification.

WARNING: MODIFYING STACK DESCRIPTIONS EVEN WHEN PERMITTED IS DISCOURAGED AS IT MAY INCREASE PUBLISHER AND VENDOR LEGAL RISKS AND MAY THEREFORE RESULT IN VENDORS REFUSING TO WORK WITH PUBLISHERS USING MODIFIED STACK DESCRIPTIONS. THIS COULD NEGATIVELY IMPACT PUBLISHER AD REVENUE.

7. If a Vendor that was not included in a prior use of the Framework UI is added by the Publisher, the Publisher must resurface or instruct its CMP to resurface the Framework UI to establish that Vendor's Permissions before signaling that the Vendor's Permissions have been established. It also means resurfacing the UI, for example, when a previously surfaced Vendor claims a previously undisclosed Purpose before signaling that the Vendor's Permissions have been established.¹
8. Publishers should remind users, or instruct their CMPs to do so, of their right to withdraw consent, as applicable, at least every 18 months.
9. A Publisher will not be required to resurface the Framework UI, or instruct its CMP to do so, if it has disclosed a Vendor's Purposes and established a Vendor's Permissions in accordance with the Policies prior to a Vendor joining the GVL.
10. A Publisher must resurface the Framework UI, or instruct its CMP to do so, if the GVL indicates in accordance with the Specifications that changes to the Framework are of such a nature as to require re-establishing Permissions.
11. A Publisher may use the Specification to manage and store, or instruct its CMP to do so, its own Permissions, including Permissions for purposes that are not supported by the Framework. A Publisher must not use Publisher-specific custom Permissions Signals to formally or informally agree signaling with any Vendor for Purposes that the

Framework covers. Such management of Permissions shall only take place if the Vendor has registered with the MO in accordance with the Policies. A Publisher may only use Publisher-specific custom Permissions Signals in conjunction with its own collection, use, or disclosure of Personal Information.

24. Accountability

1. The MO may adopt procedures for periodically reviewing and verifying a Publisher's compliance with Framework Policies. A Publisher will provide, without undue delay, any information reasonably requested by the MO to verify compliance.¹
2. The MO may suspend a Publisher from participation in the Framework for its failure to comply with Framework Policies until the Publisher comes into full compliance and demonstrates its intention and ability to remain so. The MO may block a Publisher from participation in the Framework for violations of Framework Policies that are willful and/or severe. The MO may enact a suspension or block of a Publisher by notifying CMPs that the Publisher is not in full compliance.
3. Additionally, the MO may, at its discretion and according to MO procedures, take additional actions in response to a Publisher's non-compliance, including publicly communicating the Publisher's non-compliance and reporting the non-compliance to the Data Protection Authority.

¹This can be done by comparing current vs prior version of the GVL and then comparing to the Publisher's list.

Chapter V: Interacting with Users

1. Chapter II (Policies for CMPs), Chapter IV (Policies for Publishers), Appendix A (Purposes and Features Definitions), and Appendix B (User Interface Requirements) set out requirements for interacting with users. CMPs and/or Publishers are responsible for interacting with users in accordance with these Policies and the Specifications.

Appendix A: Purposes and Features Definitions

A. Purposes

Purpose 1 - Intentionally deleted for Canada

Purpose 2 - Use limited data to select advertising

Number	2
Name	Use limited data to select advertising
User-friendly text	Advertising presented to you on this service can be based on limited data, such as the website or app you are using, your non-precise location, your device type or which content you are (or have been) interacting with (for example, to limit the number of times an ad is presented to you).
Illustrations	<p>A car manufacturer wants to promote its electric vehicles to environmentally conscious users living in the city after office hours. The advertising is presented on a page with related content (such as an article on climate change actions) after 6:30 p.m. to users whose non-precise location suggests that they are in an urban zone.</p> <p>A large producer of watercolour paints wants to carry out an online advertising campaign for its latest watercolour range, diversifying its audience to reach as many amateur and professional artists as possible and avoiding showing the ad next to mismatched content (for instance, articles about how to paint your house). The number of times that the ad has been presented to you is detected and limited, to avoid presenting it too often.</p>
Vendor guidance	<ul style="list-style-type: none"> ● Permissible Forms of Consent: implied consent, express consent. ● This purpose is intended to enable processing activities such as: <ul style="list-style-type: none"> ○ Selection and delivery of an ad based on real-time data (e.g. information about the page content, app type, non-precise geolocation data etc.) ○ Real time data, as referenced above, may be used for positive or negative targeting e.g. to serve an ad adapted to the online context or prevent an ad from serving in an unsuitable (brand-unsafe) context ○ Control the frequency of ads shown to a user. ○ Sequence the order in which ads are shown to a user. ○ <i>Note:</i> This purpose allows for the collection, use or disclosing of non-precise geolocation data to select and deliver an ad.

	<p>However, processing precise geolocation data for this purpose requires the user’s express consent to Special Feature 1 in addition to having obtained consent for collecting, using or disclosing Personal Information for this Purpose.</p> <ul style="list-style-type: none"> ○ [with Feature 1] Combine data obtained offline with data available in the moment, about the user, to select an ad. ○ [with Feature 2] Link different devices in order to select an ad. ○ [with Feature 3] Identify a device by receiving and using automatically sent device characteristics in order to select an ad in the moment. ○ [with Permission for Special Feature 1] Use precise geolocation data to select and deliver an ad in the moment, without storing it ○ [with Permission for Special Feature 2] Identify a device by actively scanning device characteristics in order to select an ad in the moment ● This Purpose does not cover processing activities such as: <ul style="list-style-type: none"> ○ Create an advertising profile about a user (including a user’s prior activity, interests, visits to sites or apps, location, or demographic information) without having obtained consent for Purpose 3 ○ Use an advertising profile to select future ads about a user (including a user’s prior activity, interests, visits to sites or apps, location, or demographic information) without having obtained consent for Purpose 4
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Purpose 3 - Create profiles for personalized advertising

Number	3
Name	Create profiles for personalized advertising
User-friendly text	Information about your activity on this service (such as forms you submit, content you look at) can be stored and combined with other information about you (for example, information from your previous activity on this service and other websites or apps) or similar users. This is then used to build or improve a profile about you (that might include possible interests and personal aspects). Your profile can be used to present advertising that appears more relevant based on your possible interests by this and other entities.
Illustration(s)	If you read several articles about the best bike accessories to buy, this information could be used to create a profile about your interest in bike accessories. Such a profile may be used or improved later on, on the same or a different website or app to present you with advertising for a particular bike accessory brand. If you also look at a configurator for a vehicle on a luxury car

	<p>manufacturer website, this information could be combined with your interest in bikes to refine your profile and make an assumption that you are interested in luxury cycling gear.</p> <p>An apparel company wishes to promote its new line of high-end baby clothes. It gets in touch with an agency that has a network of clients with high income customers (such as high-end supermarkets) and asks the agency to create profiles of young parents or couples who can be assumed to be wealthy and to have a new child, so that these can later be used to present advertising within partner apps based on those profiles.</p>
<p>Vendor guidance</p>	<ul style="list-style-type: none"> ● Permissible Forms of Consent: implied consent, express consent. ● When combining information collected under this Purpose with other information previously collected, the latter must have been collected with an appropriate Permission. ● This Purpose is intended to enable processing activities such as: <ul style="list-style-type: none"> • Associate data collected, including information about the content and the device, such as: device type and capabilities, user agent, URL, IP address with a new or existing ad profile based on user interests or personal aspect of the user • Establish retargeting criteria • Establish positive or negative targeting criteria • [with Feature 1] Associate data obtained offline with an online user to create or edit a user profile for use in advertising, provided that Permission was established offline at the point of data collection • [with Feature 2] Collecting data for deterministic cross-device mapping (e.g. if a user logs into an account on one device and then on another) • [with Feature 3] Associate an identifier obtained by receiving and using automatically sent device characteristics, with a profile for use in advertising • [with Permission for Special Feature 1] Select a personalized ad, based on a personalized ads profile, by processing precise geolocation previously stored or made available in the moment • [with Permission for Special Feature 2] Associate an identifier obtained by actively scanning device characteristics with a profile for use in advertising ● This Purpose does not cover processing activities such as: <ul style="list-style-type: none"> • Keep track of ad frequency and ad sequence which can be done on the basis of Purpose 2, and do not require Purpose 3 • Create a shared profile for both personalized ads and content, the vendor should only create and/or update that profile with the appropriate established Permissions for both Purpose 3 and 5 • Measure ad performance which can be done on the basis of Purpose 7

Purpose 4 - Use profiles to select personalized advertising

Number	4
Name	Use profiles to select personalized advertising
User-friendly text	Advertising presented to you on this service can be based on your advertising profiles, which can reflect your activity on this service or other websites or apps (like the forms you submit, content you look at), possible interests and personal aspects.
Illustration(s)	<p>An online retailer wants to advertise a limited sale on running shoes. It wants to target advertising to users who previously looked at running shoes on its mobile app. Tracking technologies might be used to recognize that you have previously used the mobile app to consult running shoes, in order to present you with the corresponding advertisement on the app.</p> <p>A profile created for personalized advertising in relation to a person having searched for bike accessories on a website can be used to present the relevant advertisement for bike accessories on a mobile app of another organization.</p>

Vendor guidance	<ul style="list-style-type: none">● Permissible Forms of Consent: implied consent, express consent.● Requires having obtained consent for Purpose 2 (Use limited data to select advertising) to be used● This purpose is intended to enable processing activities such as:<ul style="list-style-type: none">○ Select ads based on a personalized ads profile○ Select an ad based on retargeting criteria○ Select an ad based on positive or negative targeting criteria tied to a profile○ Select dynamic creative based on an ad profile, or other historical information○ [with Feature 1] Select a personalized ad, based on a personalized ads profile, by matching and combining data obtained offline with the data stored in an online profile○ [with Feature 2] Select a personalized ad, based on a personalized ads profile, by linking different devices○ [with Feature 3] Select an ad based on a personalized profile associated with an identifier obtained by receiving and using automatically sent device characteristics○ [with Permission for Special Feature 1] Select an ad based on precise geolocation previously stored○ [with Permission for Special Feature 2] Select an ad based on a personalized profile associated with an identifier obtained by actively scanning device characteristics. <p>This purpose does not cover processing activities such as:</p> <ul style="list-style-type: none">● Select ads based on ad frequency and ad sequence which can be done on the basis of Purpose 2, and do not require Purpose 4● Use a shared profile to select both personalized ads and content, the vendor should only use that profile with the appropriate Permissions for both Purpose 4 and 6
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Purpose 5 – Create profiles to personalize content

Number	5
Name	Create profiles to personalize content
User-friendly text	Information about your activity on this service (for instance, forms you submit, non-advertising content you look at) can be stored and combined with other information about you (such as your previous activity on this service or other websites or apps) or similar users. This is then used to build or improve a profile about you (which might for example include possible interests and personal aspects). Your profile can be used to present content that appears more relevant based on your possible interests, such as by adapting the order in which content is shown to you, so that it is even easier for you to find content that matches your interests.
Illustration(s)	<p>You read several articles on how to build a treehouse on a social media platform. This information might be added to a profile to mark your interest in content related to outdoors as well as do-it-yourself guides (with the objective of allowing the personalization of content, so that for example you are presented with more blog posts and articles on treehouses and wood cabins in the future).</p> <p>You have viewed three videos on space exploration across different TV apps. An unrelated news platform that you visit with which you have had no contact builds a profile based on that viewing behaviour, marking space exploration as a topic of possible interest for other videos.</p>

Vendor guidance	<ul style="list-style-type: none">● Permissible Forms of Consent: implied consent, express consent, Implied Consent.● Content refers to elements of the service (e.g. products for an e-commerce service; articles and videos for a media company) and not advertising as such. Creating a profile for advertising personalization, such as paid cross-site content promotion and native advertising is <i>not</i> included in Purpose 5, but the corresponding ad-related Purpose 3.● When combining information collected under this Purpose with other information previously collected, the latter must have been collected with an appropriate Permissions.● This Purpose is intended to enable processing activities such as:<ul style="list-style-type: none">○ Associate data collected, including information about the content and the device, such as: device type and capabilities, user agent, URL, IP address with a new or existing content profile based on user interests or personal characteristics of the user○ Establish positive or negative targeting criteria○ [with Feature 1] Associate offline data with an online user to create or edit a user profile for use in content personalization provided that Permission was established offline at the point of data collection○ [with Feature 2] Collecting data for deterministic cross-device mapping (e.g. if a user logs into an account on one device and then on another)○ [with Feature 3] Associate an identifier obtained by receiving and using automatically sent device characteristics, with a profile for use in content personalization○ [with Permission for Special Feature 1] Store precise geolocation data in a profile for use in content personalization.○ [with Permission for Special Feature 2] Associate an identifier obtained by actively scanning device characteristics with a profile for use in content personalization● This Purpose does not cover processing activities such as:<ul style="list-style-type: none">○ Create a shared profile for both personalized ads and content, the vendor should only create and/or update that profile with the appropriate Permissions for both Purpose 3 and 5○ Measure content performance which can be done on the basis of Purpose 8
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	<ul style="list-style-type: none"> ○ If a Vendor uses a shared profile for personalized ads and personalized content, the Vendor should only create and/or update that profile with the appropriate established Permissions for both Purpose 3 and 5. ● [with Feature 1] Associate offline data with an online user to create or edit a user profile for use in content personalization ● [with Feature 2] Link different devices and store that data point in a profile for use in content personalization. ● [with Feature 3] Associate an identifier obtained by receiving and using automatically sent device characteristics, with a profile for use in content personalization ● [with Permission for Special Feature 1] Store Precise Geolocation Data in a profile for use in content personalization. ● [with Permission for Special Feature 2] Associate an identifier obtained by actively scanning device characteristics with a profile for use in content personalization
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Purpose 6 – Use profiles to select personalized content

Number	6
Name	Use profiles to select personalized content
User-friendly text	Content presented to you on this service can be based on your content personalization profiles, which can reflect your activity on this or other services (for instance, the forms you submit, content you look at), possible interests and personal aspects, such as by adapting the order in which content is shown to you, so that it is even easier for you to find (non-advertising) content that matches your interests.
Illustration(s)	<p>You read articles on vegetarian food on a social media platform and then use the cooking app of an unrelated company. The profile built about you on the social media platform will be used to present you vegetarian recipes on the welcome screen of the cooking app.</p> <p>You have viewed three videos about rowing across different websites. An unrelated video sharing platform that you visit will recommend five other videos on rowing that may be of interest to you when you use your TV app, based on a profile built about you when you visited those different websites to watch online videos.</p>

Vendor guidance	<ul style="list-style-type: none"> ● Permissible Forms of Consent: implied consent, express consent. ● Content refers to elements of the service (e.g. products for an e-commerce service; articles and videos for a media company) and not advertising as such. Personalizing advertising content, such as paid cross-site content promotion and native advertising is <i>not</i> included in Purpose 6, but the corresponding ad-related Purpose 4. ● This Purpose is intended to enable processing activities such as: <ul style="list-style-type: none"> ○ Select content based on a personalized content profile ○ [with Feature 1] Select personalized content, based on a personalized content profile, by matching and combining data obtained offline with the data stored in an online profile ○ [with Feature 2] Select personalized content, based on a personalized content profile, by linking different devices ○ [with Feature 3] Select personalized content based on a personalized profile associated with an identifier obtained by receiving and using automatically sent device characteristics ○ [with Permission for Special Feature 1] Select personalized content, based on a content profile, by processing precise geolocation previously stored or made available in the moment ○ [with Permission for Special Feature 2] Select personalized content, based on a personalized content profile by using an identifier obtained by actively scanning device characteristics ● This Purpose does not cover processing activities such as: <ul style="list-style-type: none"> ○ Use a shared profile to select both personalized ads and content, the vendor should only use that profile with the appropriate Permissions for both Purpose 4 and 6
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Purpose 7 - Measure advertising performance

Number	7
Name	Measure advertising performance
User-friendly text	Information regarding which advertising is presented to you and how you interact with it can be used to determine how well an advert has worked for you or other users and whether the goals of the advertising were reached. For instance, whether you saw an ad, whether you clicked on it, whether it led you to buy a product or visit a website, etc. This is very helpful to understand the relevance of advertising campaigns
Illustration(s)	<p>You have clicked on an advertisement about a “black Friday” discount by an online shop on the website of a publisher and purchased a product. Your click will be linked to this purchase. Your interaction and that of other users will be measured to know how many clicks on the ad led to a purchase.</p> <p>You are one of very few to have clicked on an advertisement about an “international appreciation day” discount by an online gift shop within the app of</p>

	<p>a publisher. The publisher wants to have reports to understand how often a specific ad placement within the app, and notably the “international appreciation day” ad, has been viewed or clicked by you and other users, in order to help the publisher and its partners (such as agencies) optimize ad placements.</p>
<p>Vendor guidance</p>	<ul style="list-style-type: none"> ● Permissible Forms of Consent: implied consent, express consent . ● When combining information collected under this purpose with other information previously collected, the latter must have been collected with an appropriate Permissions. ● This Purpose is intended to enable processing activities such as: <ul style="list-style-type: none"> ○ Measure how brand suitable or safe the content of the digital property where the ad was served was ○ Measure the percentage of the ad that had the opportunity to be seen and for how long ○ Measure how many users engaged with an ad, for how long and what was the nature of that engagement (click, tap, hover, scroll etc.) ○ Determine how many unique users or devices an ad was served to <ul style="list-style-type: none"> • Measure the time when users saw the ad • Measure/ analyse the characteristics of the device the ad was served to (non-precise location, type of device, screen size, language of the device, operating system/browser, mobile carrier) • Measure ad attribution, conversions, sales lift • Report on an individual and aggregate level ○ [with Feature 1] Measure ad performance by matching and combining data obtained offline with the data obtained online ○ [with Feature 2] Measure ad performance by linking different devices ○ [with Feature 3] Measure ad performance by using an identifier obtained by receiving and using automatically sent device characteristics ○ [with Permission for Special Feature 1] Measure ad performance by processing precise geolocation previously stored or made available in the moment ○ [with Permission for Special Feature 2] Measure ad performance by using an identifier obtained by actively scanning device characteristics ● This Purpose does not cover processing activities such as: <ul style="list-style-type: none"> ○ apply panel-derived demographic information to the measurement data unless the user has also granted the appropriate Permission for Purpose 9. ○ improve individual profile or segment data for other purposes

Purpose 8 - Measure content performance

Number	8
Name	Measure content performance
User-friendly text	Information regarding which content is presented to you and how you interact with it can be used to determine whether the (non-advertising) content e.g. reached its intended audience and matched your interests. For instance, whether you read an article, watch a video, listen to a podcast or look at a product description, how long you spent on this service and the web pages you visit etc. This is very helpful to understand the relevance of (non-advertising) content that is shown to you.
Illustration(s)	<p>You have read a blog post about hiking on a mobile app of a publisher and followed a link to a recommended and related post. Your interactions will be recorded as showing that the initial hiking post was useful to you and that it was successful in interesting you in the related post. This will be measured to know whether to produce more posts on hiking in the future and where to place them on the home screen of the mobile app.</p> <p>You were presented a video on fashion trends, but you and several other users stopped watching after 30 seconds. This information is then used to evaluate the right length of future videos on fashion trends for future ads that will be presented to you.</p>
Vendor guidance	<ul style="list-style-type: none"> ● Permissible Forms of Consent: implied consent, express consent. ● Content refers to elements of the service (e.g. products for an e-commerce service; articles and videos for a media company) and not advertising as such. Advertising performance measurement of paid cross-site content promotion and native advertising is <i>not</i> included in Purpose 8 but should be conducted under Purpose 7. ● When combining information collected under this Purpose with other information previously collected, the latter must have been collected with an appropriate Permissions without an appropriate Permission for these purposes. ● This Purpose is intended to enable processing activities such as: <ul style="list-style-type: none"> • Measure how many users engaged with content, for how long and what was the nature of that engagement (click, tap, hover, scroll etc.) • Determine how many unique users or devices content was served to <ul style="list-style-type: none"> • Measure the time when users saw content • Measure/ analyze the characteristics of the device content was served to (non-precise location, type of device, screen size, language of the device, operating system/browser, mobile carrier) • Measure user referrals

	<ul style="list-style-type: none">• [with Feature 1] Measure content performance by matching and combining data obtained offline with the data obtained online• [with Feature 2] Measure content performance by linking different devices• [with Feature 3] Measure content performance by using an identifier obtained by receiving and using automatically sent device characteristics• [with Permission for Special Feature 1] Measure content performance by processing precise geolocation previously stored or made available in the moment• [with Permission for Special Feature 2] Measure content performance by using an identifier obtained by actively scanning device characteristics• This Purpose does not cover processing activities such as:<ul style="list-style-type: none">• apply panel-derived demographic information to the measurement data unless the user has also granted the appropriate Permission for Purpose 9• improve individual profile or segment data for other Purposes
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Purpose 9 – Understand audiences through statistics or combinations of data from different sources

Number	9
Name	Understand audiences through statistics or combinations of data from different sources
User-friendly text	Reports can be generated based on the combination of data sets (like user profiles, statistics, market research, analytics data) regarding your interactions and those of other users with advertising or (non-advertising) content to identify common characteristics (for instance, to determine which target audiences are more receptive to an ad campaign or to certain contents).
Illustration(s)	<p>The owner of an online bookstore wants commercial reporting showing the proportion of visitors who consulted and left its site without buying, or consulted and bought the last celebrity autobiography of the month, as well as the average age and the male/female distribution of each category. Data relating to your navigation on its site and to your personal characteristics is then used and combined with other such data to produce these statistics.</p> <p>An advertiser wants to better understand the type of audience interacting with its adverts. It calls upon a research institute to compare the characteristics of users who interacted with the ad with typical attributes of users of similar platforms, across different devices. This comparison reveals to the advertiser that its ad audience is mainly accessing the adverts through mobile devices and is likely in the 45-60 age range.</p>

Vendor guidance	<ul style="list-style-type: none">● Permissible Forms of Consent: implied consent, express consent .● When combining information collected under this Purpose with other information previously collected, the latter must have been collected with an appropriate Permission.● This Purpose is intended to enable processing activities such as:<ul style="list-style-type: none">○ Provide aggregate reporting to advertisers, publishers or their representatives about the unique reach of online services and/or the audiences of their ads, through panel-based and similarly derived insights (e.g. to model demographic attributes of audience segments):<ul style="list-style-type: none">• Website/Apps KPIs across ads and contents• usually panel-derived:• Age• Gender• interests / affinity / in-market categories: what else are users interested in○ Create market research aggregate reporting (e.g. Syndicated data from JICs, Ad Audience certifications, etc.)○ [with Feature 1] This Purpose serves to match offline obtained data (panel data) to online obtained data (through Purpose 7 or 8)○ [with Feature 2] Apply market research to generate audience insights by linking different devices○ [with Feature 3] Use identifiers generated by receiving and using automatically sent device characteristics○ [with Permission for Special Feature 1] Use precise geolocation data to apply market research data in order to generate audience insights○ [with Permission for Special Feature 2] Use identifiers generated by actively scanning device characteristics to apply market research data in order to generate audience data● This Purpose does not cover processing activities such as:<ul style="list-style-type: none">○ improve individual profile or segment data for other Purposes○ report about the audiences using methods covered in Purposes 7 and 8○ apply measurement data to the panel-derived demographic information unless the user has also granted the appropriate Permission for Purpose 7 and/or 8
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Purpose 10 - Develop and improve services

Number	10
Name	Develop and improve services
User-friendly text	Information about your activity on this service, such as your interaction with ads or content, can be very helpful to improve products and services and to build new products and services based on user interactions, the type of audience, etc. This specific Purpose does not include the development or improvement of user profiles and identifiers.
Illustration(s)	<p>A technology platform working with a social media provider notices a growth in the volume of mobile app users and sees based on their profiles that many of them are connecting through mobile connections. It uses a new technology to deliver ads that are formatted for mobile devices and that are low-bandwidth, to improve their performance.</p> <p>An advertiser is looking for a way to display ads on a new type of consumer device. It collects information regarding the way users interact with this new kind of device to determine whether it can build a new mechanism for displaying advertising on this type of device.</p>
Vendor guidance	<ul style="list-style-type: none"> ● Permissible Forms of Consent: implied consent, express consent. ● When combining information collected under this Purpose with other information previously collected, the latter must have been collected with an appropriate Permission. ● This Purpose is intended to enable processing activities such as: <ul style="list-style-type: none"> • product improvement or new product development • creation of new models and algorithms through machine learning • [with Feature 1] Develop and improve products by matching and combining data obtained offline with the data obtained online • [with Feature 2] Develop and improve products by linking different devices • [with Feature 3] Develop and improve products by using an identifier obtained by receiving and using automatically sent device characteristics • [with Permission for Special Feature 1] Develop and improve products by processing precise geolocation previously stored or made available in the moment • [with Permission for Special Feature 2] Develop and improve products by using an identifier obtained by actively scanning device characteristics ● This Purpose does not cover processing activities such as: ● improve individual profile or segment data for other purposes (or e.g. creating a new identity graph)

B. Special Purposes

Special Purpose 1 – Ensure security, prevent and detect fraud, and fix errors

Number	1
Name	Ensure security, prevent and detect fraud, and fix errors
User-friendly text	Your data can be used to monitor for and prevent unusual and possibly fraudulent activity (for example, regarding advertising, ad clicks by bots), and ensure systems and processes work properly and securely. It can also be used to correct any problems you, the publisher or the advertiser may encounter in the delivery of content and ads and in your interaction with them.
Illustration(s)	An advertising intermediary delivers ads from various advertisers to its network of partnering websites. It notices a large increase in clicks on ads relating to one advertiser and uses data regarding the source of the clicks to determine that 80% of the clicks come from bots rather than humans.
Vendor guidance	<ul style="list-style-type: none"> ● Special Purpose: No Permission is sought to the collection, use, or disclosure via the Framework. ● This Purpose is to be used by 3rd parties operating on digital property, and it does not affect publishers' ability to run fraud checks outside of the TCF and independently. ● This Purpose is intended to enable processing activities such as: <ul style="list-style-type: none"> ○ Monitoring, preventing ex and post ante: <ul style="list-style-type: none"> ■ General Invalid Traffic Detection and Blocking ■ Sophisticated Invalid Traffic Detection and Blocking <ul style="list-style-type: none"> ● Automated Browsing, Dedicated Device ● Automated Browsing, Non-Dedicated Device ● Incentivized Human Activity ● Manipulated Human activity ● Falsified Measurement Events ● Domain Misrepresentation ● Hidden Ads ● Advertising Spam ● Process of identifying product errors – making products work (not improving them) ● Ensuring operability of the system/platform

Special Purpose 2 – Deliver and present advertising and content

Number	2
Name	Deliver and present advertising and content
User-friendly text	Certain information (like an IP address or device capabilities) is used to ensure the technical compatibility of the content or advertising, and to facilitate the transmission of the content or ad to your device.
Illustration(s)	Clicking on a link in an article might normally send you to another page or part of the article. To achieve this, 1°) your browser sends a request to a server linked to the website, 2°) the server answers back (“here is the article you asked for”), using technical information automatically included in the request sent by your device, to properly display the information / images that are part of the article you asked for. Technically, such exchange of information is necessary to deliver the content that appears on your screen.
Vendor guidance	<ul style="list-style-type: none"> ● Special Purpose: No Permission is sought to the collection, use, or disclosure via the Framework. ● This Purpose covers both ads and content ● This Purpose is intended to enable processing activities such as: <ul style="list-style-type: none"> ○ Receiving and responding to ad or content requests ○ Delivering of ad-files or content files to an IP address ○ Using information received automatically to deliver compatible ads or content, such as: <ul style="list-style-type: none"> • User Agent type • Supported language • Connection type • Size and type of the ad or content requested ○ Respond to a user’s interaction with ad or content by sending the user to a landing page ○ Logging that an ad was delivered, without recording any personal data about the user ○ Logging that content was delivered, without recording any personal data about the user

C. Features

Feature 1 – Match and combine data from other sources

Number	1
Name	Match and combine data from other data sources
User-friendly text	Information about your activity on this service may be matched and combined with other information relating to you and originating from various sources (for instance your activity on a separate online service, your use of a loyalty card in-store, or your answers to a survey), in support of the Purposes explained in this notice.
Vendor guidance	<ul style="list-style-type: none"> • Data from various sources refers to data originating from other services than the digital property for which you have established appropriate permissions (e.g. activity on other digital properties or services, loyalty cards, in-store purchase histories, data obtained from events or direct emailing campaigns). • As the TCF only works online, “appropriate Permissions” in the preceding bullet refers to Permissions established offline at the point of data collection. • This feature is intended to enable means of processing such as: <ul style="list-style-type: none"> • Combine and match data originating from various sources for one or more Purposes or Special Purposes, for which you have established appropriate Permissions. • Data previously or separately collected and combined under this feature must have been collected with appropriate Permissions.

Feature 2 - Link different devices

Number	2
Name	Link different devices
User-friendly text	In support of the Purposes explained in this notice, your device is inferred to be linked to other devices that belong to you or your household (for instance because you are logged in to the same service on both your phone and your computer, or because you may use the same Internet connection on both devices).
Vendor guidance	<ul style="list-style-type: none"> • This feature is intended to enable means of processing such as: <ul style="list-style-type: none"> • Establish (deterministically or probabilistically) that two or more devices belong to the same user or household for one or more Purposes or Special Purposes, for which you have established appropriate Permissions.

Feature 3 – Identify devices based on information transmitted automatically

Number	3
Name	Identify devices based on information transmitted automatically
User-friendly text	Your device might be distinguished from other devices based on information it automatically sends when accessing the Internet (for instance, the IP address of your Internet connection or the type of browser you are using) in support of the Purposes exposed in this notice.
Vendor guidance	<ul style="list-style-type: none"> • This feature is intended to enable means of processing such as: <ul style="list-style-type: none"> • Create an identifier using data collected automatically from a device for specific characteristics, e.g. IP address, user-agent string • Use such an identifier to attempt to re-identify a device • This feature does not allow the creation and use of an identifier based on data collected actively retrieved from the device via JavaScript or API (e.g. installed font or screen resolution). This operation is separately covered by Special Feature 2. <p>Use of this data for security or fraud prevention is separately covered by Special Purpose 1 and does not require separate declaration of this feature</p>

D. Special Features

Special Feature 1 - Use precise geolocation data

Number	1
Name	Use precise geolocation data
User-friendly text	With your acceptance, your precise location (within a radius of less than 500 metres) may be used in support of the Purposes explained in this notice.

Vendor guidance	<ul style="list-style-type: none"> • Special Feature: Users must give express consent for this Feature before Vendors may use it. • This special feature is intended to enable means of processing such as: <ul style="list-style-type: none"> • Collect data about a user’s browser or device to create an identifier and distinguish the user from other users across visits, using a combination of information accessed via JavaScript or APIs such as time zone, system fonts, screen resolution, and installed plugins • This feature does not cover the creation and use of an identifier based on data collected automatically received from the device (IP addresses, user agent string or other information not actively retrieved from the device. This operation is separately covered by Feature 3.
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Special Feature 2 - Actively scan device characteristics for identification

Number	2
Name	Actively scan device characteristics for identification
User-friendly text	With your acceptance, certain characteristics specific to your device might be requested and used to distinguish it from other devices (such as the installed fonts or plugins, the resolution of your screen) in support of the Purposes explained in this notice.
Vendor guidance	<ul style="list-style-type: none"> • Special Feature: Users must give express consent for this Feature before Vendors may use it. • This special feature is intended to enable means of processing such as: <ul style="list-style-type: none"> • Collect data about a user’s browser or device to create an identifier and distinguish the user from other users across visits, using a combination of information accessed via JavaScript or APIs such as time zone, system fonts, screen resolution, and installed plugins • This feature does not cover the creation and use of an identifier based on data collected automatically received from the device (IP addresses, user agent string or other information not actively retrieved from the device. This operation is separately covered by Feature 3.

E. Stacks

Stacks may be used to substitute Initial Layer information about two or more Purposes and/or Special Features (also see Appendix B). Purposes must not be included in more than one Stack and must not be presented as part of a Stack and outside of Stacks at the same time. Conversely, any Stacks used must not include the same Purpose more than once, nor include Purposes presented separately from Stacks.

Stack 1 - Precise geolocation data, and identification through device scanning

Number	1
Name	Precise geolocation data, and identification through device scanning
Description	Precise geolocation and information about device characteristics can be used.
Special Features included	<ul style="list-style-type: none"> ● Special Feature 1: Use precise geolocation data ● Special Feature 2: Actively scan device characteristics for identification

Stack 2 - Basic ads and ad measurement

Number	2
Name	Basic ads and ad measurement
Description	Basic ads can be served. Ad performance can be measured.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 7: Measure advertising performance

Stack 3 - Personalized ads

Number	3
Name	Personalized ads
Description	Ads can be personalized based on a profile. More data can be added to better personalize ads.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 3: Create profiles for personalized advertising ● Purpose 4: Use profiles to select personalized advertising

Stack 4 - Basic ads, ad measurement, and audience insights

Number	4
Name	Basic ads, ad measurement, and audience insights
Description	Basic ads can be served. Ad performance can be measured. Insights about the audiences who saw the ads and content can be derived.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 7: Measure advertising performance ● Purpose 9: Understand audiences through statistics or combinations of data from different sources

Stack 5 - Basic ads, personalized ads profile, and ad measurement

Number	5
Name	Basic ads, personalized ads profile, and ad measurement
Description	Basic ads can be served. More data can be added to better personalized ads. Ad performance can be measured.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 3: Create profiles for personalized advertising ● Purpose 7: Measure advertising performance

Stack 6 - Personalized ads display and ad measurement

Number	6
Name	Personalized ads display and measurement
Description	Ads can be personalized based on a profile. Ad performance can be measured.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 4: Use profiles to select personalized advertising ● Purpose 7: Measure advertising performance

Stack 7 - Personalized ads display, ad measurement, and audience insights

Number	7
Name	Personalized ads display, ad measurement, and audience insights
Description	Ads can be personalized based on a profile. Ad performance can be measured. Insights about the audiences who saw the ads and content can be derived.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 4: Use profiles to select personalized advertising ● Purpose 7: Measure advertising performance ● Purpose 9: Understand audiences through statistics or combinations of data from different sources

Stack 8 - Personalized ads and ad measurement

Number	8
Name	Personalized ads and ad measurement
Description	Ads can be personalized based on a profile. More data can be added to better personalized ads. Ad performance can be measured.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 3: Create profiles for personalized advertising ● Purpose 4: Use profiles to select personalized advertising ● ● Purpose 7: Measure advertising performance

Stack 9 - Personalized ads, ad measurement, and audience insights

Number	9
Name	Personalized ads, ad measurement, and audience insights
Description	Ads can be personalized based on a profile. More data can be added to better personalized ads. Ad performance can be measured. Insights about the audiences who saw the ads and content can be derived.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 3: Create profiles for personalized advertising ● Purpose 4: Use profiles to select personalized advertising ● Purpose 7: Measure advertising performance ● Purpose 9: Understand audiences through statistics or combinations of data from different sources

Stack 10 - Personalized ads profile and display

Number	10
Name	Personalized ads profile and display
Description	Ads can be personalized based on a profile. More data can be added to better personalized ads.
Purposes included	<ul style="list-style-type: none"> ● Purpose 3: Create profiles for personalized advertising ● Purpose 4: Use profiles to select personalized advertising

Stack 11 - Personalized content

Number	11
Name	Personalized content
Description	Content can be personalized based on a profile. More data can be added to better personalized content.
Purposes included	<ul style="list-style-type: none"> ● Purpose 5: Create profiles to personalize content ● Purpose 6: Use profiles to select personalized content

Stack 12 - Personalized content display and content measurement

Number	12
Name	Personalized content display and content measurement
Description	Content can be personalized based on a profile. Content performance can be measured.
Purposes included	<ul style="list-style-type: none"> ● Purpose 6: Use profiles to select personalized content ● Purpose 8: Measure content performance

Stack 13 - Personalized content display, content measurement and audience insights

Number	13
Name	Personalized content display, content measurement and audience insights
Description	Content can be personalized based on a profile. Content performance can be measured. Insights about the audiences who saw the ads and content can be derived.
Purposes included	<ul style="list-style-type: none">● Purpose 6: Use profiles to select personalized content● Purpose 8: Measure content performance● Purpose 9: Understand audiences through statistics or combinations of data from different sources

Stack 14 - Personalized content and content measurement

Number	14
Name	Personalized content and content measurement
Description	Content can be personalized based on a profile. More data can be added to better personalized content. Content performance can be measured.
Purposes included	<ul style="list-style-type: none"> ● Purpose 5: Create profiles to personalize content ● Purpose 6: Use profiles to select personalized content ● Purpose 8: Measure content performance

Stack 15 - Personalized content, content measurement and audience insights

Number	15
Name	Personalized content, content measurement and audience insights
Description	Content can be personalized based on a profile. More data can be added to better personalized content. Content performance can be measured. Insights about the audiences who saw the ads and content can be derived.
Purposes included	<ul style="list-style-type: none"> ● Purpose 5: Create profiles to personalize content ● Purpose 6: Use profiles to select personalized content ● Purpose 8: Measure content performance ● Purpose 9: Understand audiences through statistics or combinations of data from different sources

Stack 16 - Personalized content, content measurement, audience insights, and product development.

Number	16
Name	Personalized content, content measurement, audience insights, and product development
Description	Content can be personalized based on a profile. More data can be added to better personalized content. Content performance can be measured. Insights about the audiences who saw the ads and content can be derived. Data can be used to build or improve user experience, systems, and software
Purposes included	<ul style="list-style-type: none"> ● Purpose 5: Create profiles to personalize content ● Purpose 6: Use profiles to select personalized content ● Purpose 8: Measure content performance ● Purpose 9: Understand audiences through statistics or combinations of data from different sources ● Purpose 10: Develop and improve services

Stack 17 - Ad and content measurement, and audience insights

Number	17
Name	Ad and content measurement, and audience insights
Description	Ad and content performance can be measured. Insights about the audiences who saw the ads and content can be derived.
Purposes included	<ul style="list-style-type: none"> ● Purpose 7: Measure advertising performance ● Purpose 8: Measure content performance ● Purpose 9: Understand audiences through statistics or combinations of data from different sources

Stack 18 - Ad and content measurement

Number	18
Name	Ad and content measurement
Description	Ad and content performance can be measured.
Purposes included	<ul style="list-style-type: none"> ● Purpose 7: Measure advertising performance ● Purpose 8: Measure content performance

Stack 19 - Ad measurement and audience insights

Number	19
Name	Ad measurement and audience insights
Description	Ad can be measured. Insights about the audiences who saw the ads and content can be derived.
Purposes included	<ul style="list-style-type: none"> ● Purpose 7: Measure advertising performance ● Purpose 9: Understand audiences through statistics or combinations of data from different sources

Stack 20 - Ad and content measurement, audience insights, and product development

Number	20
Name	Ad and content measurement, audience insights, and product development
Description	Ad and content performance can be measured. Insights about the audiences who saw the ads and content can be derived. Data can be used to build or improve user experience, systems, and software. Insights about the audiences who saw the ads and content can be derived.
Purposes included	<ul style="list-style-type: none"> ● Purpose 7: Measure advertising performance ● Purpose 8: Measure content performance ● Purpose 9: Understand audiences through statistics or combinations of data from different sources ● Purpose 10: Develop and improve services

Stack 21 - Content measurement, audience insights, and product development

Number	21
Name	Content measurement, audience insights, and product development.
Description	Content performance can be measured. Insights about the audiences who saw the ads and content can be derived. Data can be used to build or improve user experience, systems, and software.
Purposes included	<ul style="list-style-type: none"> ● Purpose 8: Measure content performance ● Purpose 9: Understand audiences through statistics or combinations of data from different sources ● Purpose 10: Develop and improve services

Stack 22 - Content measurement and product development

Number	22
Name	Content measurement and product development
Description	Content performance can be measured. Data can be used to build or improve user experience, systems, and software.
Purposes included	<ul style="list-style-type: none"> ● Purpose 8: Measure content performance ● Purpose 10: Develop and improve services

Stack 23 - Personalized ads and content display, ad and content measurement

Number	23
Name	Personalized ads and content display, ad and content measurement
Description	Ads and content can be personalized based on a profile. Ad and content performance can be measured.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 4: Use profiles to select personalized advertising ● Purpose 6: Use profiles to select personalized content ● Purpose 7: Measure advertising performance ● Purpose 8: Measure content performance

Stack 24 - Personalized ads and content display, ad and content measurement, and audience insights

Number	24
Name	Personalized ads and content display, ad and content measurement, and audience insights
Description	Ads and content can be personalized based on a profile. Ad and content performance can be measured. Insights about the audiences who saw the ads and content can be derived. Data can be used to build or improve user experience, systems, and software.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 4: Use profiles to select personalized advertising ● Purpose 6: Use profiles to select personalized content ● Purpose 7: Measure advertising performance ● Purpose 8: Measure content performance ● Purpose 9: Understand audiences through statistics or combinations of data from different sources

Stack 25 - Personalized ads and content, ad and content measurement

Number	25
Name	Personalized ads and content, ad and content measurement
Description	Ads and content can be personalized based on a profile. More data can be added to better personalized ads and content. Ad and content performance can be measured.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 3: Create profiles for personalized advertising ● Purpose 4: Use profiles to select personalized advertising ● Purpose 5: Create profiles to personalize content ● Purpose 6: Use profiles to select personalized content ● Purpose 7: Measure advertising performance ● Purpose 8: Measure content performance

Stack 26 - Personalized ads and content, ad and content measurement, and audience insights

Number	26
Name	Personalized ads and content, ad and content measurement, and audience insights
Description	Ads and content can be personalized based on a profile. More data can be added to better personalized ads and content. Ad and content performance can be measured. Insights about the audiences who saw the ads and content can be derived.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 3: Create profiles for personalized advertising ● Purpose 4: Use profiles to select personalized advertising ● Purpose 5: Create profiles to personalize content ● Purpose 6: Use profiles to select personalized content ● Purpose 7: Measure advertising performance ● Purpose 8: Measure content performance ● Purpose 9: Understand audiences through statistics or combinations of data from different sources

Stack 27 - Personalized ads and content profile

Number	27
Name	Personalized ads and content profile
Description	More data can be added to personalize ads and content.
Purposes included	<ul style="list-style-type: none"> ● Purpose 3: Create profiles for personalized advertising ● Purpose 5: Create profiles to personalize content

Stack 28 - Personalized ads and content display

Number	28
Name	Personalized ads and content display
Description	Ads and content can be personalized based on a profile.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 4: Use profiles to select personalized advertising ● Purpose 6: Use profiles to select personalized content

Stack 29 - Basic ads, ad and content measurement, and audience insights

Number	29
Name	Basic ads, ad and content measurement, and audience insights
Description	Basic ads can be served. Ad and content performance can be measured. Insights about the audiences who saw the ads and content can be derived.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 7: Measure advertising performance ● Purpose 8: Measure content performance ● Purpose 9: Understand audiences through statistics or combinations of data from different sources

Stack 30 - Personalized ads display, personalized content, ad and content measurement, and audience insights

Number	30
Name	Personalized ads display, personalized content, ad and content measurement, a audience insights
Description	Ads and content can be personalized based on a profile. More data can be added to better personalized content. Ad and content performance can be measured. Insights about the audiences who saw the ads and content can be derived.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 4: Use profiles to select personalized advertising ● Purpose 5: Create profiles to personalize content ● Purpose 6: Use profiles to select personalized content ● Purpose 7: Measure advertising performance ● Purpose 8: Measure content performance ● Purpose 9: Understand audiences through statistics or combinations of data from different sources

Stack 31 - Personalized ads display, personalized content, ad and content measurement, audience insights, and product development

Number	31
Name	Personalized ads display, personalized content, ad and content measurement, audience insights, and product development
Description	Ads and content can be personalized based on a profile. More data can be added to better personalized content. Ad and content performance can be measured. Insights about the audiences who saw the ads and content can be derived. Data can be used to build or improve user experience, systems, and software.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 4: Use profiles to select personalized advertising ● Purpose 5: Create profiles to personalize content ● Purpose 6: Use profiles to select personalized content ● Purpose 7: Measure advertising performance ● Purpose 8: Measure content performance ● Purpose 9: Understand audiences through statistics or combinations of data from different sources ● Purpose 10: Develop and improve services

Stack 32 - Basic ads, personalized content, ad and content measurement, and audience insights

Number	32
Name	Basic ads, personalized content, ad and content measurement, and audience insights
Description	Basic ads can be served. Content can be personalized based on a profile. More data can be added to better personalized content. Ad and content performance can be measured. Insights about the audiences who saw the ads and content can be derived.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 5: Create profiles to personalize content ● Purpose 6: Use profiles to select personalized content ● Purpose 7: Measure advertising performance ● Purpose 8: Measure content performance ● Purpose 9: Understand audiences through statistics or combinations of data from different sources

Stack 33 - Basic ads, personalized content, ad and content measurement, audience insights, and product development

Number	33
Name	Basic ads, personalized content, ad and content measurement, audience insight and product development
Description	Basic ads can be served. Content can be personalized based on a profile. More data can be added to better personalized content. Ad and content performance can be measured. Insights about the audiences who saw the ads and content can be derived. Data can be used to build or improve user experience, systems, and software.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 5: Create profiles to personalize content ● Purpose 6: Use profiles to select personalized content ● Purpose 7: Measure advertising performance ● Purpose 8: Measure content performance ● Purpose 9: Understand audiences through statistics or combinations of data from different source ● Purpose 10: Develop and improve services

Stack 34 - Basic ads, personalized content, content measurement, and audience insights

Number	34
Name	Basic ads, personalized content, content measurement, and audience insights
Description	Basic ads can be served. Content can be personalized based on a profile. More data can be added to better personalized content. Ad and content performance can be measured. Insights about the audiences who saw the ads and content can be derived.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 5: Create profiles to personalize content ● Purpose 6: Use profiles to select personalized content ● Purpose 8: Measure content performance ● Purpose 9: Understand audiences through statistics or combinations of data from different source

Stack 35 - Basic ads, personalized content, content measurement, audience insights, and product development

Number	35
Name	Basic ads, personalized content, content measurement, audience insights, and product development
Description	Basic ads can be served. Content can be personalized based on a profile. More data can be added to better personalized content. Content performance can be measured. Insights about the audiences who saw the ads and content can be derived. Data can be used to build or improve user experience, systems, and software.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 5: Create profiles to personalize content ● Purpose 6: Use profiles to select personalized content ● Purpose 8: Measure content performance ● Purpose 9: Understand audiences through statistics or combinations of data from different source ● Purpose 10: Develop and improve services

Stack 36 - Basic ads, personalized content, and ad measurement

Number	36
Name	Basic ads, personalized content, and ad measurement
Description	Basic ads can be served. Content can be personalized based on a profile. More data can be added to better personalized content. Ad performance can be measured.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 5: Create profiles to personalize content ● Purpose 6: Use profiles to select personalized content ● Purpose 7: Measure advertising performance

Stack 37 - Basic ads, personalized content, ad measurement, and product development

Number	37
Name	Basic ads, personalized content, ad measurement, and product development
Description	Basic ads can be served. Content can be personalized based on a profile. More data can be added to better personalized content. Ad performance can be measured. Data can be used to build or improve user experience, systems, and software.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 5: Create profiles to personalize content ● Purpose 6: Use profiles to select personalized content ● Purpose 7: Measure advertising performance ● Purpose 10: Develop and improve services

Stack 38 – Personalized ads, ad measurement, and product development

Number	38
Name	Personalized ads, ad measurement, and product development.
Description	Ads can be personalized based on a profile. More data can be added to better personalize ads. Ad performance can be measured. Data can be used to build or improve user experience, systems, and software.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 3: Create profiles for personalized advertising ● Purpose 4: Use profiles to select personalized advertising ● Purpose 7: Measure advertising performance ● Purpose 10: Develop and improve services

Stack 39 - Personalized ads, ad measurement, audience insights and product development

Number	39
Name	Personalized ads, ad measurement, audience insights and product development.
Description	Ads can be personalized based on a profile. More data can be added to better personalize ads. Ad performance can be measured. Insights about the audiences who saw the ads and content can be derived. Data can be used to build or improve user experience, systems and software.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 3: Create profiles for personalized advertising ● Purpose 4: Use profiles to select personalized advertising ● Purpose 7: Measure advertising performance ● Purpose 9: Understand audiences through statistics or combinations of data from different source ● Purpose 10: Develop and improve services

Stack 40 - Personalized ads, ad and content measurement, audience insights and product development

Number	40
Name	Personalized ads, ad and content measurement, audience insights and product development
Description	Ads can be personalized based on a profile. More data can be added to better personalize ads. Ad and content performance can be measured. Insights about audiences who saw the ads and content can be derived. Data can be used to build or improve user experience, systems and software.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 3: Create profiles for personalized advertising ● Purpose 4: Use profiles to select personalized content ● Purpose 7: Measure advertising performance ● Purpose 8: Measure content performance ● Purpose 9: Understand audiences through statistics or combinations of data from different source ● Purpose 10: Develop and improve services

Stack 41 – Personalized ads, personalized content display, ad and content measurement, audience insights and product development

Number	41
Name	Personalized ads, personalized content display, ad and content measurement, audience insights and product development
Description	Ads and content can be personalized based on a profile. More data can be added to better personalize ads. Ad and content performance can be measured. Insights about audiences who saw the ads and content can be derived. Data can be used to build or improve user experience, systems and software.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 3: Create profiles for personalized advertising ● Purpose 4: Use profiles to select personalized advertising ● Purpose 6: Use profiles to select personalized content ● Purpose 7: Measure advertising performance ● Purpose 8: Measure content performance ● Purpose 9: Understand audiences through statistics or combinations of data from different source ● Purpose 10: Develop and improve services

Stack 42 - Personalized ads and content, ad and content measurement, audience insights and product development

Number	42
Name	Personalized ads and content, ad and content measurement, audience insights and product development
Description	Ads and content can be personalized based on a profile. More data can be added to better personalize ads and content. Ad and content performance can be measured. Insights about audiences who saw the ads and content can be derived. Data can be used to build or improve user experience, systems and software.
Purposes included	<ul style="list-style-type: none"> ● Purpose 2: Use limited data to select advertising ● Purpose 3: Create profiles for personalized advertising ● Purpose 4: Use profiles to select personalized advertising ● Purpose 5: Create profiles to personalize content ● Purpose 6: Use profiles to select personalized content ● Purpose 7: Measure advertising performance ● Purpose 8: Measure content performance ● Purpose 9: Understand audiences through statistics or combinations of data from different source ● Purpose 10: Develop and improve services

F. Example Stack Combinations

Example Stack Combination 1

- **Special Feature 1: Use precise geolocation data**
- **Stack 3: Personalized advertising**
 - Purpose 2: Use limited data to select advertising
 - Purpose 3: Create profiles for personalized advertising
 - Purpose 4: Use profiles to select personalized advertising
- **Stack 11: Personalized content**
 - Purpose 5: Create a personalized content profile
 - Purpose 6: Use profiles to select personalized content
- **Stack 17: Advertising and content measurement, and audience research**
 - Purpose 7: Measure advertising performance
 - Purpose 8: Measure content performance
 - Purpose 9: Understand audiences through statistics or combinations of data from different sources
- **Purpose 10: Develop and improve services**

Example Stack Combination 2

- **Special Feature 1: Use precise geolocation data**
- **Stack 8:**
- **Personalized advertising and advertising measurement**
 - Purpose 2: Use limited data to select advertising
 - Purpose 3: Create profiles for personalized advertising
 - Purpose 4: Use profiles to select personalized advertising
 - Purpose 7: Measure advertising performance
- **Stack 14: Personalized content, and content measurement**
 - Purpose 5: Create profiles to personalize content
 - Purpose 6: Use profiles to select personalized content
 - Purpose 8: Measure content performance
 - **Purpose 9:** Understand audiences through statistics or combinations of data from different sources
 - **Purpose 10: Develop and improve services**

Example Stack Combination 3 (Advertisers)

- **Special Feature 1: Use precise geolocation data**
- **Stack 3: Personalized advertising**
 - Purpose 2: Use limited data to select basic ads
 - Purpose 3: Create profiles for personalized advertising
 - Purpose 4: Use profiles to select personalized advertising

- **Stack 19: Advertising measurement and audience research**
 - Purpose 7: Measure advertising performance
 - Purpose 9: Understand audiences through statistics or combinations of data from different sources
 - Purpose 10: Develop and improve services

Categories of data

1 - IP addresses

Number	1
Name	IP addresses
User-friendly text	Your IP address is a number assigned by your Internet Service Provider to any Internet connection. It is not always specific to your device and is not always a stable identifier. It is used to route information on the Internet and display online content (including ads) on your connected device.
Vendor guidance	A Vendor’s servers may receive users’ public IP addresses to route traffic across the internet, e.g. to deliver an ad through http requests. Vendors should declare this category of data even if they process the IP address on the fly without storing it.

2 - Device characteristics

Number	2
Name	Device characteristics
User-friendly text	Technical characteristics about the device you are using that are not unique to you, such as the language, the time zone or the operating system.
Vendor guidance	A Vendor may process characteristics about the device, language, timezone, the operating system, software and applications related to the device.

3 - Device identifiers

Number	3
Name	Device identifiers
User-friendly text	A device identifier is a unique string of characters assigned to your device or browser by means of a cookie or other storage technologies. It may be created or accessed to recognize your device e.g. across web pages from the same site or across multiple sites or apps.
Vendor guidance	A Vendor may write and access unique identifiers on users' devices, such as identifiers managed/created by the Vendor or Publisher, the Vendor's partners or identifiers provided by operating systems (such as IDFAs, IDFBs or GAIDs).

4 - Probabilistic identifiers

Number	4
Name	Probabilistic identifiers
User-friendly text	A probabilistic identifier can be created by combining characteristics associated with your device (the type of browser or operating system used) and the IP address of the Internet connection. If you give your agreement, additional characteristics (e.g. the installed font or screen resolution) can also be combined to improve precision of the probabilistic identifier. Such an identifier is considered "probabilistic" because several devices can share the same characteristics and Internet connection. It may be used to recognize your device across e.g. web pages from the same site or across multiple sites or apps.
Vendor guidance	A Vendor may create identifiers using data collected automatically from devices for specific characteristics, e.g. IP address, user-agent string. Vendors creating this type of identifiers should declare Feature 3 (Receive and use automatically-sent device characteristics for identification). A Vendor may also create identifiers using data collected via actively scanning a device for specific characteristics, e.g. installed fonts or screen resolution. Vendors creating this type of identifiers should declare Special Feature 2, to which users must opt-in.

5 - Authentication-derived identifiers

Number	5
Name	Authentication-derived identifiers
User-friendly text	Where an identifier is created on the basis of authentication data, such as contact details associated with online accounts you have created on websites or apps (e.g. e-mail address, phone number) or customer identifiers (e.g. identifier provided by your telecom operator), that identifier may be used to recognize you across websites, apps and devices when you are logged-in with the same contact details.
Vendor guidance	A Vendor may create identifiers based on users' authentication information (e.g. their email addresses or phone number). Examples of such identifiers include identifiers derived from users' email addresses or phone numbers through hash function (SHA-256, MD5, SHA-1...) and other non-reversible forms of encryption, and unique identifiers mapped with users' authentication information.

6 - Browsing and interaction data

Number	6
Name	Browsing and interaction data
User-friendly text	Your online activity such as the websites you visit, apps you are using, the content you search for on this service, or your interactions with content or ads, such as the number of times you have seen a specific content or ad or whether you clicked on it.
Vendor guidance	A Vendor may process information such as accessed web pages, viewed contents, interactions with a website, apps, or an ad, and research done by the user.

7 - User-provided data

Number	7
Name	User-provided data
User-friendly text	The information you may have provided by way of declaration via a form (e.g. feedback, a comment) or when creating an account (e.g. your age, your occupation).
Vendor guidance	A Vendor may process users' declarative information communicated by way of declaration via a form or when creating an account, such as the age range or the occupation

8 - Non-precise location data

Number	8
Name	Non-precise location data
User-friendly text	An approximation of your location, expressed as an area with a radius of at least 500 metres. Your approximate location can be deduced from e.g. the IP address of your connection.
Vendor guidance	A Vendor may process geographic location with latitude and longitude coordinates with two or fewer decimals and/or within an area of a circle with a radius of at least 500 metres.

9 - Precise location data

Number	9
Name	Precise location data
User-friendly text	Your precise location within a radius of less than 500 metres based on your GPS coordinates. It may be used only with your acceptance.
Vendor guidance	A Vendor may process geographic location with latitude and longitude coordinates beyond two decimals and/or within an area of a circle with a radius of less than 500 metres.

10 - Users' profiles

Number	10
Name	Users' profiles
User-friendly text	Certain characteristics (e.g. your possible interests, your purchase intentions, your consumer profile) may be inferred or modelled from your previous online activity (e.g. the content you viewed or the service you used, your time spent on various online content and services) or the information you have provided (e.g. your age, your occupation).
Vendor guidance	A Vendor may process information regarding the fact that a user is assigned (by the Vendor or otherwise) to a user interest group(s)/cohort(s) that share common characteristics such as demographic characteristics, preferences, interest or purchase intent.

11 - Privacy choices

Number	11
Name	Privacy choices
User-friendly text	Your preferences regarding the processing of your data, based on the notice you have received.
Vendor guidance	A Vendor may process users' Signals or part of it as defined by the Policies or Specifications sent by a CMP, usually on behalf of a Publisher, to Vendors that includes, amongst others, notice about the transparency, consent, and/or Objection status of a Vendor and/or Purpose, the opt-in status of a Special Feature, and Publisher restrictions.

Appendix B: User Interface Requirements

A. Scope

- a. This Appendix applies to any party deploying a user interface in connection with the Framework (“Framework UI”). Typically, this is the first party in the interaction with the user, such as a Publisher operating its own private CMP, or relying on the services of a commercial CMP. Both the Publisher and the CMP are responsible to ensure that these requirements are met. Appendix B should be read in conjunction with Chapter II (Policies for CMPs), Chapter IV (Policies for Publishers), and Chapter V (Policies for Interacting with Users).
- b. A Publisher and/or CMP is responsible for determining when the Framework UI will be shown in accordance with the Framework Policies and the Specifications, consistent with legal requirements to support the transparent and lawful collection, use, or disclosure of users’ Personal Information by Vendors. The Framework UI may be used to support the Publisher’s own transparent and lawful collection, use, or disclosure of users’ Personal Information.
- c. The Framework Policies and the Specifications establish minimum requirements for language, design, and other elements in the Framework UI. These minimum requirements are intended to align with legal requirements of Canadian Privacy Law. In the event of a conflict between applicable Canadian law and Appendix B, the law prevails. Unless stated otherwise, nothing in Appendix B is intended to prevent the creation of Framework UIs that go beyond these minimum requirements.

B. General Rules and Requirements for Framework UIs

- a. When providing transparency and/or consent choices to users, the Framework UI may make use of a so-called layered approach that provides key information immediately in an Initial Layer and makes more detailed information available elsewhere in additional layers for those users who are interested in it. Appendix B provides minimum requirements for certain layers, in particular the Initial Layer, where the Framework UI makes use of a layered approach.
- b. When providing transparency about Purposes, Special Purposes, Features and Special Features, the Framework UI must do so only on the basis of the standard Purpose, Special Purpose, Feature, and Special Feature names and definitions of Appendix A as they are published on the Global Vendor List or using Stacks in accordance with the Policies and Specifications. UIs must make available the standard legal text of Purposes, Special Purposes, Features, and Special Features of Appendix A but may substitute or supplement the standard legal definitions with the standard user-friendly text of Appendix A so long as the legal text remains available to the user and it is explained that these legal texts are definitive. Either way, the language used must be user-friendly and generally

understandable.

- c. Where the Framework UI uses a language other than English, the Framework UI must do so only on the basis of official translations of the standard Purpose, Special Purpose, Feature and Special Feature names and definitions of Appendix A as they are published on the Global Vendor List.
- d. When providing transparency about Vendors, the Framework UI must do so only on the basis of the information provided, and declarations made by Vendors as they are published on the Global Vendor List.
- e. For the avoidance of doubt, Framework UIs may be used to also provide transparency, and request consent, for Purposes and/or Vendors, that are not covered by the Framework. However, users must not be misled to believe that any non-Framework Purpose and/or Vendor are part of the Framework or subject to its Policies. If the Framework UI includes non-Framework Purposes and/or Vendors the Framework UI must make it possible for users to distinguish between Vendors registered with the Framework, and Purposes defined by the Framework, and those who are not.
- f. In cases in which the Publisher permits Vendors which it does not disclose directly, to collect, use, or disclose users' Personal Information for one or more Purposes, Special Purposes, and/or using one or more Special Features disclosed by the Publisher in line with a OOB Permission established in previous interactions with those Vendors in other contexts, the Framework UI must provide notice to users of the same.
- g. The Framework UI must provide notice to users that their Vendor choices are limited to Purposes and Special Features and that it does not enable them to refuse consent to disclosed Vendors collecting, using, or disclosing Personal Information for Special Purposes and that Special Features may be used for Special Purpose 1 (ensure security, prevent fraud, and debug) regardless of the user's choice about Special Features.
- h. The Framework UI must provide notice to users that their Personal Information may be stored outside of Canada (or, where the Framework UI is surfaced in Quebec, that their Personal Information may be stored outside of Quebec) and therefore the legislation of the jurisdiction it is stored in will apply. Users should also be notified of the risk in having their data stored outside of the Canadian jurisdiction.

C. Specific Requirements for Framework UIs in Connection with Obtaining a User's Consent

- a. When providing transparency about Purposes, Special Purposes, Features, Special Features and Vendors in connection with obtaining a user's Permission for the same, the Framework UI must be displayed prominently and separately from other information, such as the general terms and conditions or the privacy policy, in a modal or banner that is clearly visible to a user first visiting a Digital Property.
- b. When making use of a so-called layered approach, the Initial Layer of the Framework UI providing transparency and requesting a user's consent must include at least the

following:

- i. Must include information about the fact that Personal Information is collected, used, or disclosed, and the nature of the Personal Information that is collected, used, or disclosed (e.g. unique identifiers, browsing data).
 - ii. Must include information about the fact that third party Vendors will be collecting, using, or disclosing Personal Information of the user; and a link to the list of named third parties.
 - iii. Must include the list of the distinct and separate Purposes for which the Vendors are collecting, using, or disclosing Personal Information, using at least the standardized names and/or Stack names as defined in Appendix A.
 - iv. Must include information about the Special Features used by the Vendors when collecting, using, or disclosing Personal Information.
 - v. Should include information about the consequences (if any) of consenting or not consenting (including withdrawing consent).
 - vi. Must include information about the scope of the Permission, i.e. service-specific Permission, or group-specific Permission. If group-specific Permission, a link with information about the group must be included.
 - vii. Must include information about the fact that the user can withdraw their Permission at any time, and how to resurface the Framework UI in order to do so.
 - viii. Where applicable, should include information about the fact that some Vendors (if any) have determined that it is appropriate for them to rely on the user's implied consent, taking into account the reasonable expectations of the user and the sensitivity of the Personal Information that is to be collected, used or disclosed. In such instances, the user must be informed of their ability to Object (i.e. opt-out), with a link to the relevant layer of the Framework UI dealing with collection, use, or disclosure of Personal Information on the basis of implied consent.
 - ix. Where express consent is being requested, must include a call to action for the user to grant express consent (for example [**“Accept”, “Okay”, “Approve”, “Opt-in” etc.]**).
 - x. Must include a call to action for the user to customize their choices (for example “Advanced Settings”, “Customize Choices”, etc.).
 - xi. Where applicable, must provide notice to users that their Personal Information may be stored outside of Canada (or, where the Framework UI is surfaced in Quebec, that their Personal Information may be stored outside of Quebec).
 - xii. Where applicable, must provide notice to users of their rights of access and rectification provided by law.
- c. When making use of a so-called layered approach, a secondary layer must be provided that allows the user to:
- i. Review the list of named Vendors, their Purposes, Special Purposes, Features, Special Features, associated Forms of Consent, and a link to each Vendor's privacy policy, and their maximum device storage duration.
 - ii. Review the list of Purposes, Special Purposes, Features, and Special Features including their standard name and their full standard description, as defined in Appendix A, and a way to see which Vendors are seeking Permission for each of

the Purposes.

- iii. Make granular and specific consent choices with respect to each Vendor, and, separately, each Purpose for which the Publisher chooses to obtain consent on behalf of one or more Vendors.
 - iv. Where express consent is being requested, make granular and specific express consent choices with respect to each Special Feature for which the Publisher chooses to obtain express consent on behalf of one or more Vendors.
 - v. Where applicable and not disclosed in a 1st layer, view information about the fact that some Vendors (if any) have determined that it is appropriate for them to rely on the user's implied consent for a given Purpose; the fact that the user has the ability to Object.
 - vi. Where not disclosed in a 1st layer, view information about the consequences (if any) of consenting or not consenting (including withdrawing consent).
- d. When using a so-called layered approach when seeking express consent, if a user accesses a secondary layer which allows them to make granular and specific express consent choices with respect to each Purpose and for each Special Feature, the default choice must be “no consent”, “no opt-in” or “off”.
 - e. If a UI displays Vendors who are not registered with IAB Canada for participation in the Framework, the UI must make it possible for users to distinguish between Vendors registered with the Framework, and those who are not. The UI must not mislead others as to the Framework participation of any of the Vendors who are not registered with the MO.
 - f. A user must be able to resurface the Framework UI from an easily accessible link, such as a Privacy Policy or a separate icon available on the Publisher's Digital Property as to allow them to withdraw their Permission as easily as it was to give it, notably by including a call to action for the user to withdraw their consent (for example “Withdraw consent” or “Opt-out”).
 - g. Calls to action in a Framework UI must not be invisible, illegible, or appear disabled. While calls to action do not need to be identical, to ensure they are clearly visible, they must have matching text treatment (font, font size, font style) and, for the text of each, a minimum contrast ratio of 5 to
 1. To the extent that an Initial Layer has more than two calls to action, this policy only applies to the two primary calls to action.
 - h. By way of derogation from Appendix B, Policies C(c)(iii) and (iv) and C(d), a Publisher shall not be required to allow a user to make granular and specific consent choices if the Publisher implements a way for the user to access its content without consenting through other means, for example by offering paid access that does not require establishing Permissions. For the avoidance of doubt, all other Policies remain applicable.

Version History and Changelog

- Version 1.0 2021-05-31
 - Removed DRAFT changelog and finalized document as version 1.0 of IAB Canada TCF Policies.