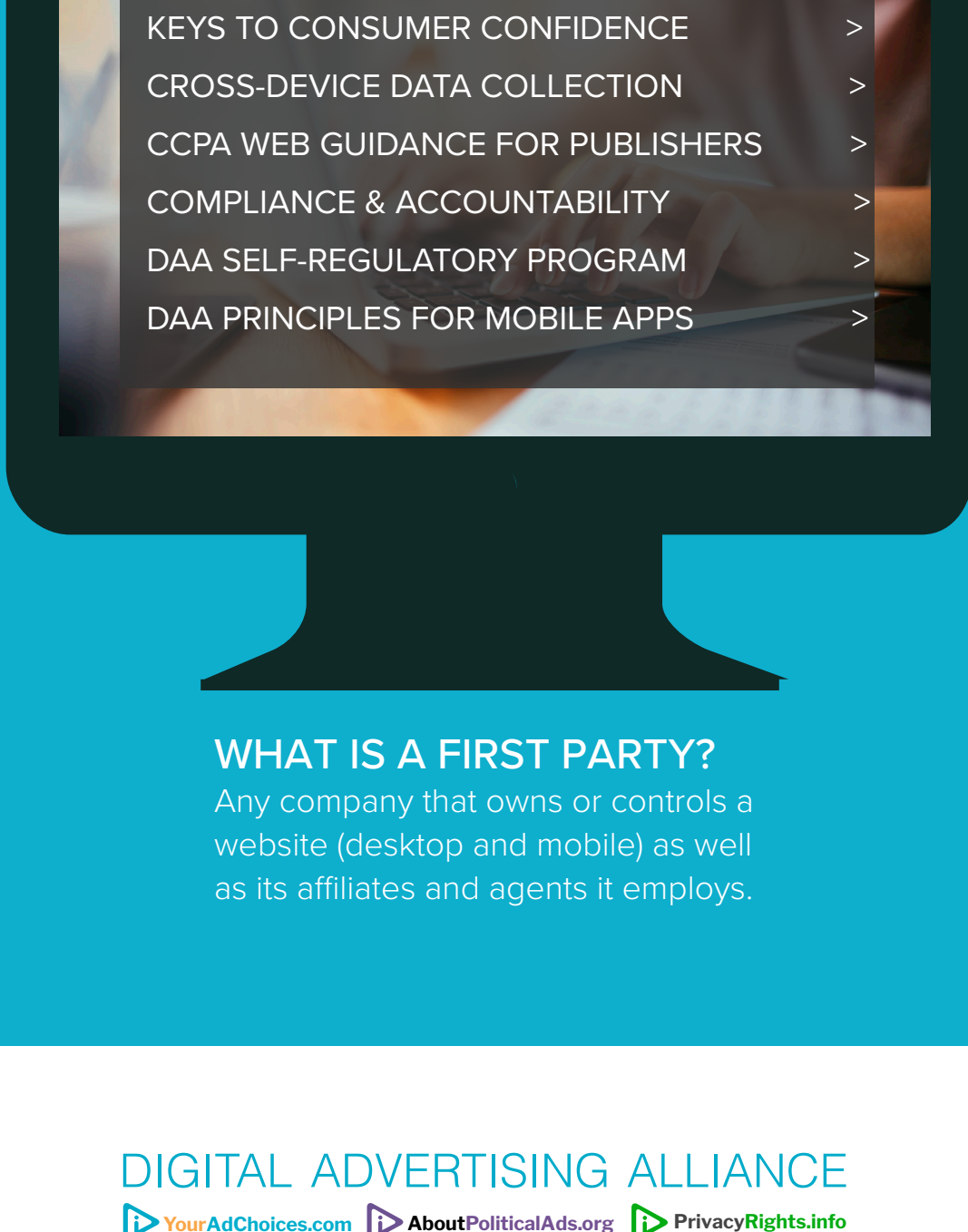


BROWSER-BASED IMPLEMENTATION GUIDANCE FOR FIRST PARTIES



WHAT IS A FIRST PARTY?

Any company that owns or controls a website (desktop and mobile) as well as its affiliates and agents it employs.

DIGITAL ADVERTISING ALLIANCE

[YourAdChoices.com](#) [AboutPoliticalAds.org](#) [PrivacyRights.info](#)

KEYS TO CONSUMER CONFIDENCE

Transparency

You provide transparency through **enhanced notice** on every page of your website where unrelated parties (non-affiliates, also referred to as third parties) are collecting, using, or transferring data for **interest-based advertising (IBA)**. Provide the consumer with a clear and prominent enhanced notice link that includes the YourAdChoices icon (▶) and accompanying text such as "AdChoices." This enhanced notice link should take the consumer **directly to the notice section** within your privacy policy and/or any other place where you provide related disclosures. Enhanced notice alerts the consumer in real time outside of the privacy policy that IBA activity by non-affiliates is occurring.

Notice should include the following elements:

- A clear description of your IBA practices, including the types of data you transfer or allow unrelated companies to collect and use for IBA.
- A statement making clear that you adhere to the DAA Principles.
- An explanation of how the consumer can exercise choice.

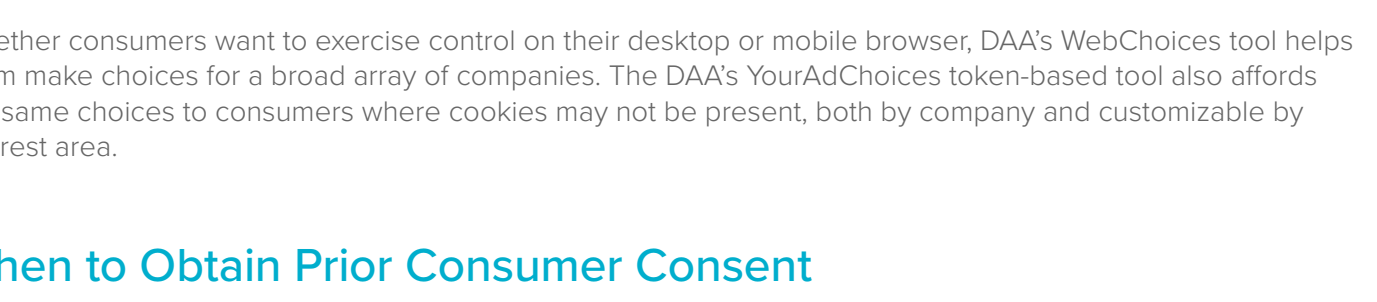
Consumer Control

You provide consumers with choice by giving them access to consumer choice options that allow them to decide whether and to what extent they want to participate in IBA either by:

Providing access to an easy-to-use **consumer choice mechanism**—such as the DAA's **WebChoices**, **AppChoices**, or **YourAdChoices** tools—that allows the consumer to opt out of the collection, use, or transfer of data by companies that engage in IBA and have integrated into DAA tools. This increases transparency and reduces problems associated with keeping listings up-to-date.

OR

Listing every unrelated company collecting and using data for IBA on your website with links to their **individual choice mechanisms**. This list should be kept updated at all times.



Example of Ad Marker Placement & Flow on Interest-Based Advertising

Whether consumers want to exercise control on their desktop or mobile browser, DAA's WebChoices tool helps them make choices for a broad array of companies. The DAA's YourAdChoices token-based tool also affords the same choices to consumers where cookies may not be present, both by company and customizable by interest area.

When to Obtain Prior Consumer Consent

There are special requirements to obtain consent before data collection or use in these categories:

Personal Directory Data

If you access personal directory data such as a consumer's contacts or address book, calendar, photos/videos through your app, you must obtain user authorization. You must not affirmatively authorize an unrelated company to access this data type through your website without the user's authorization.

Precise Location Data

If you allow an unrelated company to collect precise location data for IBA, or you transfer such data to another company through your website, you should obtain a user's consent prior to that activity and explain how to withdraw that consent.

Sensitive Health & Financial Data

You should obtain consent before you collect or transfer sensitive financial or health data to an unrelated party for use in interest-based advertising.

Data from Children Under 13

You collect data from children under 13 through your website and transfer it to an unrelated company for IBA.

Material Change to IBA Policy & Practices

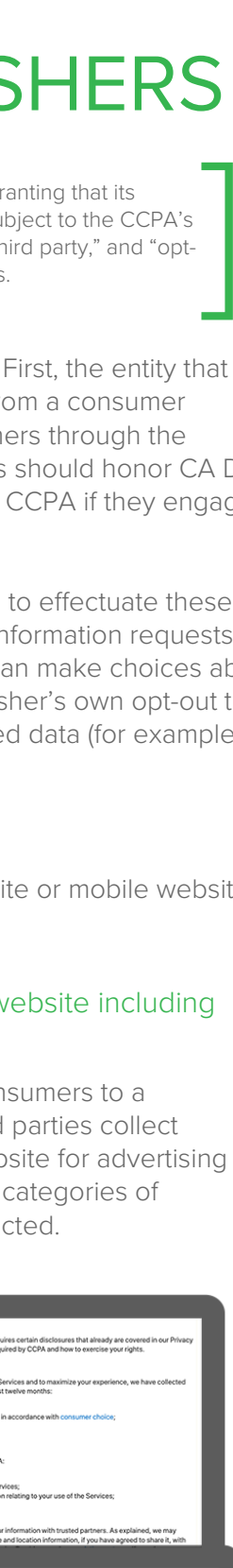
If you update your policies and practices to use previously collected data for materially different IBA purposes, you should obtain a user's consent. Engaging in less collection or use of data for IBA is not considered a material change in practice.

What is Interest-Based Advertising (IBA)?

Interest-based advertising (also called online behavioral advertising, tailored, or personalized advertising) is the collection of mobile app usage data, web-viewing data, precise location data, or personal directory data from a browser or device over time to serve relevant advertising based on inferences derived from such data to the consumer on unrelated apps or websites.

CROSS-DEVICE DATA COLLECTION FOR BROWSER-BASED IBA

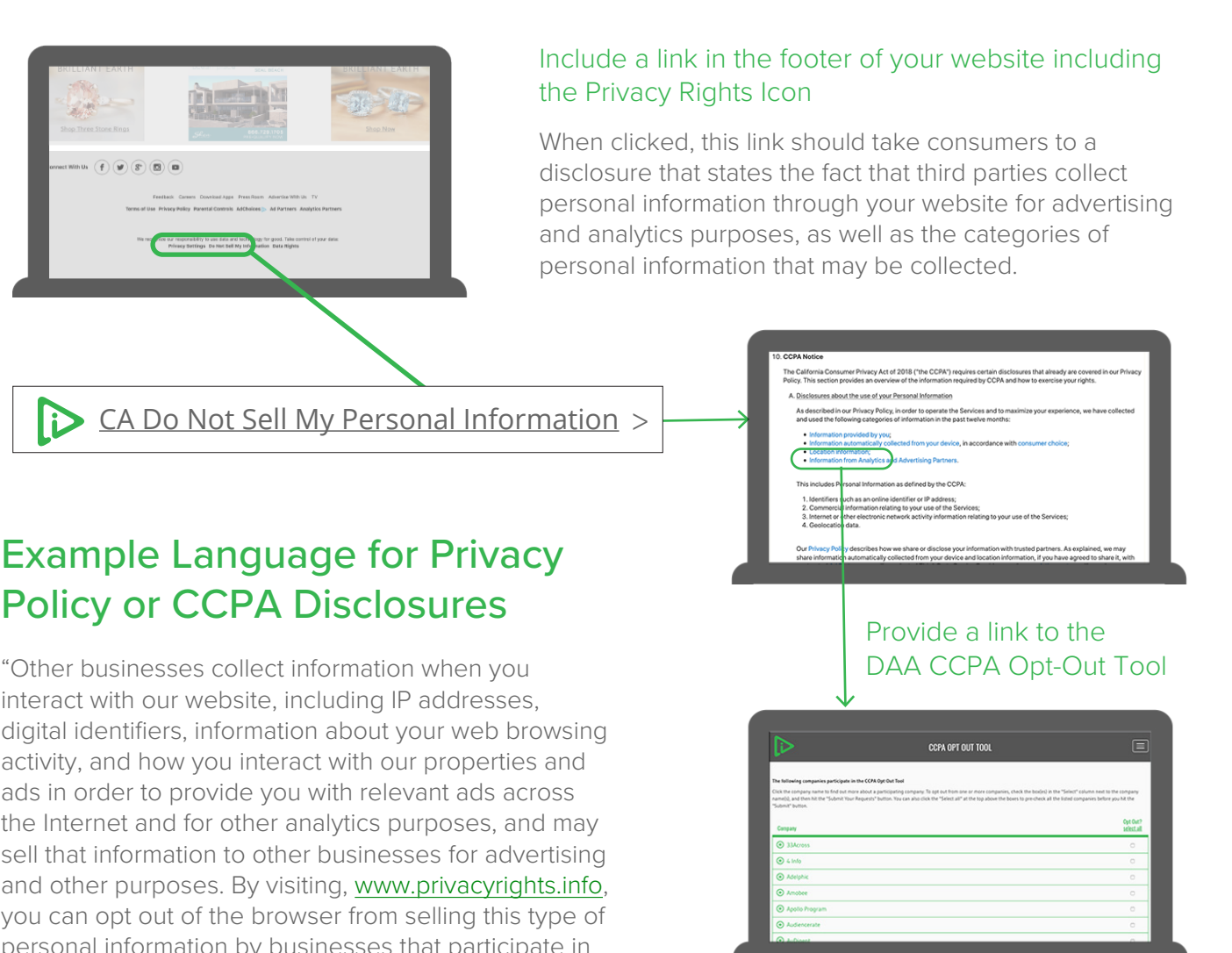
If you allow an entity to collect data through your browser or device and that data is used for IBA across other devices linked to that browser or device, or you transfer such data to an unrelated party for this same purpose, then you should include this fact within your notice and provide a link to a choice mechanism that includes cross-device activity.



Download the [Application of the Self-Regulatory Principles of Transparency and Control to Data Used Across Devices](#)

You should also direct consumers to tools that explain the scope of their choices and how they will affect their experiences online. These may include the [YourAdChoices](#), [WebChoices](#) and [AppChoices](#) tools that the DAA maintains.

Cross-Device Choice by Browser



CALIFORNIA CONSUMER PRIVACY ACT (CCPA) WEB GUIDANCE FOR PUBLISHERS

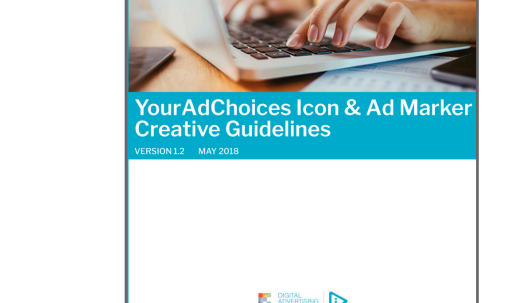
The CCPA is subject to business and interpretation. The DAA is not providing legal advice or warranting that its offerings will ensure a company's compliance with law. The guidance and use of the tools are subject to the CCPA's requirements. All terms in this document, including "collection," "sale," "personal information," "third party," and "opt-out" are used in conformance with their definitions in the CCPA and its implementing regulations.

There are two types of entities that collect personal information from a digital property. First, the entity that owns and operates the digital property and that collects personal information directly from a consumer (publisher). Second, an entity that indirectly collects personal information about consumers through the publisher's digital property (third party). As businesses, both publishers and third parties should honor CA Do Not Sell My Personal Information requests received from California residents under the CCPA if they engage in the sale of personal information.

The DAA's CA Do Not Sell Personal Information Opt-Out tool for browsers can be used to effectuate these requests for participating entities when consumers make CA Do Not Sell My Personal Information requests through a browser, stopping the sale of personal information. (Separately, consumers can make choices about interest-based advertising.) The DAA's CCPA web-based tool may complement a publisher's own opt-out tool where a consumer may have the opportunity to opt out of the sale of publisher-collected data (for example, subscriber lists, rewards members, and other covered data).

Link/Notice for Third-Party Opt Out

If you are a publisher and a third party collects personal information through your website or mobile website and sells that personal information, you should:



Include a link in the footer of your website including the [Privacy Rights Icon](#)

When clicked, this link should take consumers to a disclosure that states the fact that third parties collect personal information through your website for advertising and analytics purposes, as well as the categories of personal information that may be collected.

Example Language for Privacy Policy or CCPA Disclosures

"Other businesses collect information when you interact with our website, including IP addresses, digital identifiers, information about your web browsing activity, and how you interact with our properties and ads in order to provide you with relevant ads across the Internet and for other analytics purposes, and may sell that information to other businesses for advertising and other purposes. By visiting, [www.privacyrights.info](#), you can opt out of the browser from selling this type of personal information by businesses that participate in the opt out tool."



Provide a link to the [DAA CCPA Opt-Out Tool](#)

[optout.privacyrights.info](#)

COMPLIANCE & ACCOUNTABILITY

The DAA Principles apply industry-wide to all companies that engage in IBA. Unlike codes that membership organizations monitor and enforce, the DAA Principles are enforced by two independent accountability programs: the [BBB National Programs \(BBBNP\)](#) and the [Association of National Advertisers \(ANA\)](#).

These programs monitor and review companies' apps and websites throughout the digital environment, as well as investigate consumer complaints. They bring enforcement actions against non-complying companies. The two programs publish annual reports and have released more than 125 public enforcement actions. The accountability programs also work privately with companies that seek their advice before an enforcement action to assist them confidentially to come into compliance with the DAA Principles.



We note that this document presents easy-to-follow steps that cover the basic elements of compliance with the DAA Mobile Guidance. For a more thorough review, we encourage you to read the DAA Principles and creative ad specs related to mobile. The enforcement actions and reports of the independent enforcement agents also provide advice on compliance in particular use cases. Their work is conveniently summarized in the [DAA Casebook: Enforcement in Action](#).

The DAA Principles apply to you as a First Party if:

- You or your affiliates own or have control over a website where you authorize unrelated companies to collect data for IBA or allow unrelated companies to provide IBA on your app.
- You collect Personal Directory Data for your own use, transfer to an unrelated company, or allow an unrelated company to collect Personal Directory Data through your website for IBA.
- You collect Precise Location Data through your website and transfer it to an unrelated company or allow an unrelated company to collect Precise Location Data through your website for IBA.
- You or a Third Party collect sensitive health data, financial data, and/or data from children under 13 through your website for use in IBA.



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