



# Technical Specifications FAQ

## IAB CCPA Compliance Framework

**November 2019**

**Released with Version 1.0**

# Introduction

This document may assist technical product and engineering leads to implement the IAB CCPA Compliance Framework by providing context and examples of technical implementations. This document provides answers to Frequently Asked Questions, but is not exhaustive. The IAB CCPA Compliance Framework is comprised of policy and technical work to support CCPA compliance. This document is the work product of the [IAB Tech Lab's CCPA/U.S. Privacy Technical Working Group](#).

More information about the Framework is available at [iab.com/guidelines/ccpa-framework](http://iab.com/guidelines/ccpa-framework) and technical specifications are available at [iabtechlab.com/ccpa](http://iabtechlab.com/ccpa).

This document shows certain signals and covered scenarios for the U.S. Privacy String specified by IAB Tech Lab. Although the authors and IAB Tech Lab have made efforts to ensure the accuracy of the material herein as of the date of publication, it should not be treated as a basis for formulating business and legal decisions without individualized legal advice. In legal matters, no publication can take the place of professional advice given with full knowledge of the specific circumstances of each matter and the actual practices of the company. The authors and IAB Tech Lab make no representations or warranties, express or implied, as to the completeness, correctness, or utility of the information contained in this document and assume no liability of any kind whatsoever resulting from the use or reliance upon its contents.

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# Implementation Notes for the US Privacy String

The following guidance should be used for the v1.0 U.S. Privacy String. Specification is available at [iabtechlab.com/ccpa](http://iabtechlab.com/ccpa)

## US Privacy String Rules:

Dashes “-” can only be used to form the string “1---”. The use of dashes in combination with a “N/Y” value does not have any specific meaning within this framework. (E.g. 1--Y or 1-Y- do not have meaning defined by this framework.)

Publishers, if you are a signatory to the IAB Limited Service Provider Agreement, you should always send “1---”. This indicates you are participating in version 1 of the CCPA framework.

Complete, four character strings must be sent.

## Real Time Signal Scenarios

The following table describes some of the possible USP String scenarios. The table does not describe the meaning of 1YYY, 1YYN, or other expected scenarios.

“Digital Property” means a digital property owned and operated by a publisher or advertiser and on which a consumer’s personal information is collected.

Note: All use of terms in quotation marks have the definitions set forth in CCPA.

String	Covered Scenario
No string written	The Digital Property is using the U.S. Privacy string such that it is not utilizing IAB Tech Lab’s technical specifications and operates outside of IAB’s Limited Service Provider Agreement
1---	<p>A Digital Property has determined that a U.S. privacy law applies to the transaction. The Digital Property is using version 1 of the U.S. Privacy string specification.</p> <p>A Digital Property has determined that CCPA does not apply to the transaction because it does not involve a California “Consumer” as defined by 1798.140(g) of the CCPA and is signaling this using version 1 of the U.S. Privacy string specification.</p> <p>OR</p> <p>A Digital Property has determined to use a U.S. privacy string, but does not claim to be a “Business” pursuant to 1798.140(c) of the</p>

	CCPA. The Digital Property is signaling this using version 1 of the U.S. Privacy string specification.
_*** 1-YY 1--Y 1Y-Y 1--Y 1YY-	These variants do not have meaning defined by this framework and should be considered invalid. <i>* denotes wildcard / any value</i>

## Implementation Notes for the USP API

Optionally, Digital Properties could extend existing consumer privacy preferences implementations to support this new USP API. Supporting the new USP command shall not alter in any way any existing consumer preferences.

In many cases, GDPR and Do Not Sell scopes are mutually exclusive. In the edge cases where, e.g., a California resident visits an EU-based publisher site, additional policy guidance is needed. You may need to consult your lawyers.

Optionally, Digital Properties and Vendors can extend their implementations independently to avoid complicated deployment dependencies. For example, publishers can implement without breaking any previously existing scripts.

## Questions from Digital Property Owners (Brands/Publishers)

**When a consumer comes to a digital property, how does the digital property owner store the string? When does the string get stored?**

The U.S. Privacy String is expected to be stored when the consumer has satisfied the business' defined engagement with the opt out explicit notice. Then the string is stored in cookie or local storage.

**Who owns this service?**

Digital properties should implement the spec string format and API specifications. There is no centralized provider for API service.

## **What resources are available for Digital Property Owners to implement these technical specifications?**

Members of the IAB Tech Lab CCPA/U.S. Privacy Working Group are welcome to contribute to and benefit from reference implementation available here:

<https://github.com/InteractiveAdvertisingBureau/CCPA-reference-code>

## **General Tech Specs Questions**

### **Do I have to sign the contract?**

More information about the IAB Limited Service Provider Agreement will be available soon at [IAB CCPA Compliance Framework for Publishers](#). If you have not signed the Agreement, the fourth parameter in the USP String should NOT be set to Yes.

### **How should I handle children directed inventory?**

It is suggested to consider any other applicable regulatory compliance needs you may have. The Framework technical specifications do not specify further guidance. Additionally, you may also read more about the [Children's Online Protection Act \(COPPA\)](#) and existing children's data privacy laws.

### **Will there be a mobile in-app reference implementation?**

The Framework DOES support mobile in-app implementations. Given the simplicity of the string we currently don't plan to provide an in-app reference implementation. Contributions to the working group are welcome!

### **Have other question(s)?**

Any other questions are welcome to be submitted to the [IAB Tech Lab CCPA/U.S. Privacy Technical Working Group](#).