

Supplementary Guidance for the DAAC Principles



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Introduction

This document has been assembled to help companies apply the DAAC's Principles to various data collection and use practices often done in relation to interest-based advertising (IBA).

This consolidated guidance provides actionable takeaways for how to apply the existing Principles to native advertising, lookalike data modelling, and cross-device IBA. It also explains how to determine a user's preferred language when encountering the AdChoices program in Canada.

This document may be updated periodically to provide further guidance as the interest-based advertising ecosystem evolves and grows.

Determining User Language

The goal of determining the User Language as part of the delivery process of the DAAC's self-regulatory program is to ensure information about interest-based advertising and the AdChoices program is presented to consumers in a manner they can easily understand.

It is therefore important that consumers see the explanatory text of the Ad Marker, any informational pages relating to the program, as well as our AdChoices website, in their preferred language.

For the purposes of this implementation, the primary method to determine User Language is based on the value of a browser's language attribute. This approach should work consistently with all parties involved in delivering the Ad Marker, thus avoiding potential situations when the Ad Marker is served by two parties in two different languages.

The value of a browser's language attribute can be dynamically detected via JavaScript during Icon delivery¹. The expected languages in Canada are English and French (Canada).

If the value of a browser's language attribute cannot be read or it has a value outside of the expected ones, the notice should behave as if the language was English or "en". Also, for improved user experience, there should be an intuitive language-switching mechanism on any landing pages that participants use to educate consumers about AdChoices and interest-based advertising. As example, there are language-switching capabilities on the DAAC's website, found in the links below.

Third Parties delivering the Ad Marker may choose to use alternative methods for determining User Language, should they prefer to do so, such as GeoIP data, ad language, site language, or manually when trafficking the campaign. For consistency and overall user experience, it is important that Third Parties choosing to use alternative methods make sure that the script displaying the Ad Marker behaves correctly (i.e. if multiple parties serve the Ad Marker, only the upper-most Ad Marker expands in the rolled-out state).



Country	Language	ISO 639 Code ²	String	Default Landing Page URL
Canada	English	en	AdChoices	https://youradchoices.ca/
	French	fr	Choix de pub	https://votrechoixdepub.ca/

¹The browser language may be detected using JavaScript by querying the values of navigator.language (Firefox, Chrome, Opera), or navigator.userLanguage (Internet Explorer).

² Referenced from https://en.wikipedia.org/wiki/List_of_ISO_639-1_codes

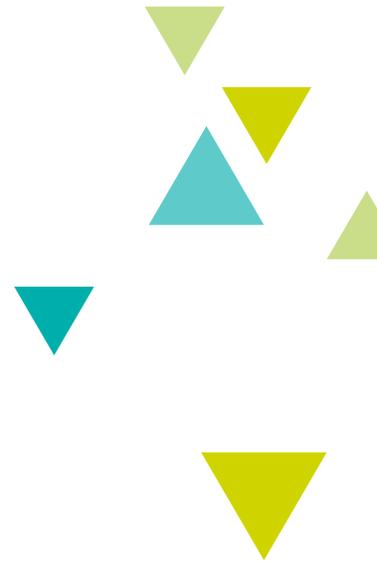
Native Advertising

Native ads are designed to complement the look and feel of publisher content.

Native advertising involves ads that match the form and function of the platform upon which it appears. The ad content can be displayed as an article, video or slideshow, and is produced by an advertiser with the specific intent to promote a product or service. Often the ad copy is made in collaboration with the editorial staff, so that it matches the form and style of the publication it is being viewed on. These types of ads look native to the environment they're in, hence the name "native advertising".

Native advertisements are sometimes delivered to consumers using interest-based advertising – which is the collection of data about a web user's interests over time and across websites and apps for the purpose of using the data to deliver more relevant advertising. When this occurs with native advertisements, the DAAC Principles apply, as they do to any other form of interest-based advertising, and both First and Third Party participants are required to provide the transparency and consumer choice mechanisms required by the DAAC Principles.

TREATMENT: For participants in the DAAC AdChoices program this would mean including the AdChoices icon with all interest-based native ads in accordance with the program guidelines and offering choice to the consumer.



Lookalike Data

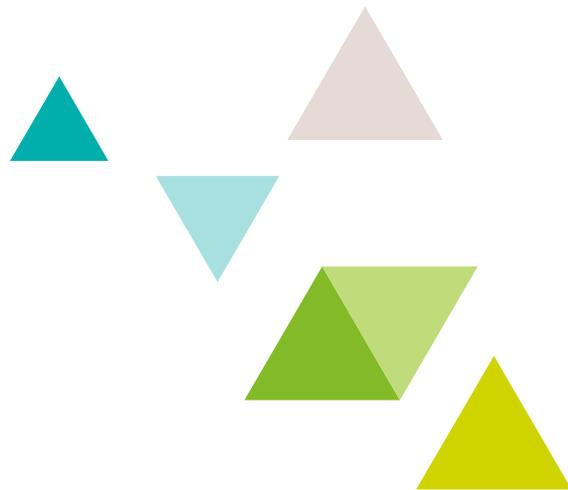
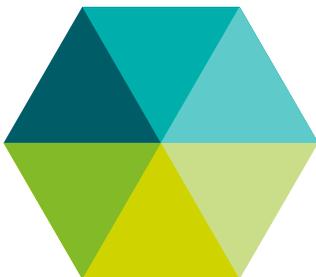
Data that's modelled based on profiles, sometimes called "lookalike" or "affinity" data, can be used to present consumers with products and services that may be of interest to them based on inferred interests of people that show the same behaviours online. Often this data is aggregated, but the requirement for notice and choice to the consumer remains.

The DAAC program encompasses activities that are broader than traditional retargeting. Lookalike data collection and any type of modelled targeting based on consumer data (directly or indirectly) would fall under the DAAC AdChoices program. First and Third Party participants are required to provide the transparency and consumer choice mechanisms required by the DAAC Principles.

TREATMENT: For participants in the DAAC AdChoices program, this would mean including the AdChoices icon with all lookalike/affinity data collection and use in accordance with the program guidelines and offering choice to the consumer.

The consumer who is the original source of the data should be provided with notice and choice for their data to be used for interest-based advertising and transferring that data to other parties.

Individuals who are being assessed for a match to that data should also be provided with notice and choice.



Cross-Device Interest-Based Advertising

Identifying consumers across their different devices can be an effective way to de-duplicate and more precisely target consumers with interest-based advertising.

Probabilistic data modelling involves cross-device tracking, which is the aggregation of data points from different devices, such as mobile phones, tablets and desktops/laptops, to infer who is using the device(s) at hand.

Due to limited targeting capabilities up until recently, when a single user switched between different devices, companies often treated them as different people. By using identifiers to link users among their various devices, companies can now understand when and where the user is online, and in the physical world, on a more accurate level. The benefit of cross-device advertising is that a company can determine the actual value of their ad spend and better optimize their marketing efforts, knowing when/where they are reaching their target audience.

Cross-device tracking for the collection or use of interest-based advertising data is covered by the DAAC Principles. All participants involved in cross-device data collection or use are required to provide consumers with transparency and control in accordance with the DAAC Principles.



TREATMENT: For participants in the DAAC AdChoices program, include the AdChoices icon with all interest-based cross-device ads, in accordance with the program guidelines, and offer control to the consumer. Entities collecting IBA data for use on a different computer or device should include a description of their data collection and use practices, and whether it will be transferred to another entity for such purpose – this is consistent with the DAAC’s existing Principles and mobile guidance.

First Parties should provide a clear, meaningful, and prominent link to a disclosure that either links to the industry developed website(s), or to a choice mechanism that provides control consistent with this guidance, or that individually lists Third Parties engaged in the collection of IBA data or cross-app data through its website or application.

The choice mechanism consumers are provided with can be for all devices the consumer uses (preferred, if available) or each device separately. Exercising choice through the consumer choice mechanism may limit such collection and use to that device and browser only, therefore the company must provide notice, and be transparent with the consumer that they will need to opt out of **each device and browser individually**. Any future transfer of IBA data from these devices should cease.

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