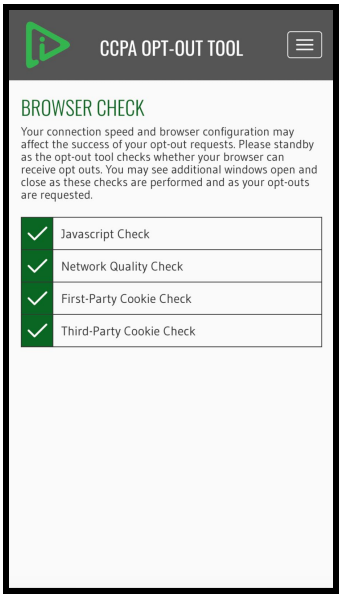
DAA CCPA Opt Out Tool for the Web

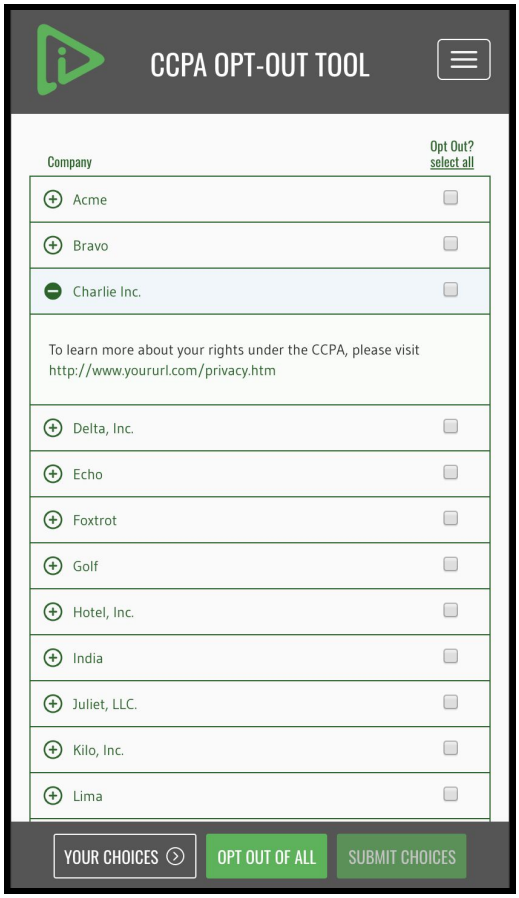


The web-based CCPA Opt Out Tool will leverage the existing *WebChoices* platform, which already allows users to set opt outs for multiple companies in a particular browser. We expect that companies already integrated with the existing *WebChoices* tool could achieve a successful integration with the new CCPA Opt Out Tool in a relatively short time frame.

The new CCPA Opt Out Tool will reside at www.privacyrights.info. Participating companies must take certain steps in order to take advantage of its functionality on or after January 1, 2020.

The functional requirements participating companies must meet to successfully engage with the new tool include:

- The ability to support a *CCPA "Do Not Sell"* request for a particular user browser, and to store the browser request through an opt out cookie or other technology.
- A privacy policy URL containing any consumer-facing CCPA disclosures (see Figure 1).
- The designation of a compliant endpoint URL or script that accepts signals initiated by consumer visits to the CCPA Opt Out Tool. The format and contents of Opt Out requests from the CCPA Opt Out Tool will be identical to the DAA's IBA opt out except that the browser HTTP referer value will be www.privacyrights.info (see Figure 2).
- Whitelisting *.privacyrights.info if your endpoint enforces a domain whitelist for Opt Out requests.
- Designation of an authoritative contact for your company to address all integration issues in a timely fashion.
- Ability to support HTTPS for your endpoint no later than January 1, 2020 (this should be applied to the URL for IBA opt out and the CCPA Opt Out Tool).



Companies may set up new endpoints specifically for the CCPA Opt Out Tool. However, participants who choose to integrate with the CCPA Opt Out Tool using their existing, compliant IBA Opt Out endpoint may use the newly established CCPA HTTP referer (privacyrights.info) to distinguish between IBA Opt Outs and CCPA out-outs.

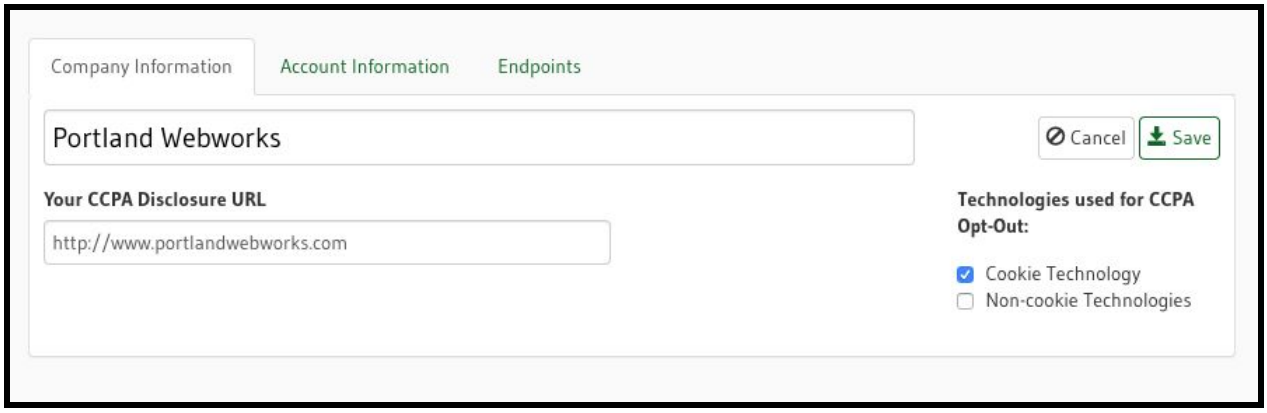


Figure 1. Participants will need to provide a URL to their own CCPA privacy disclosure.

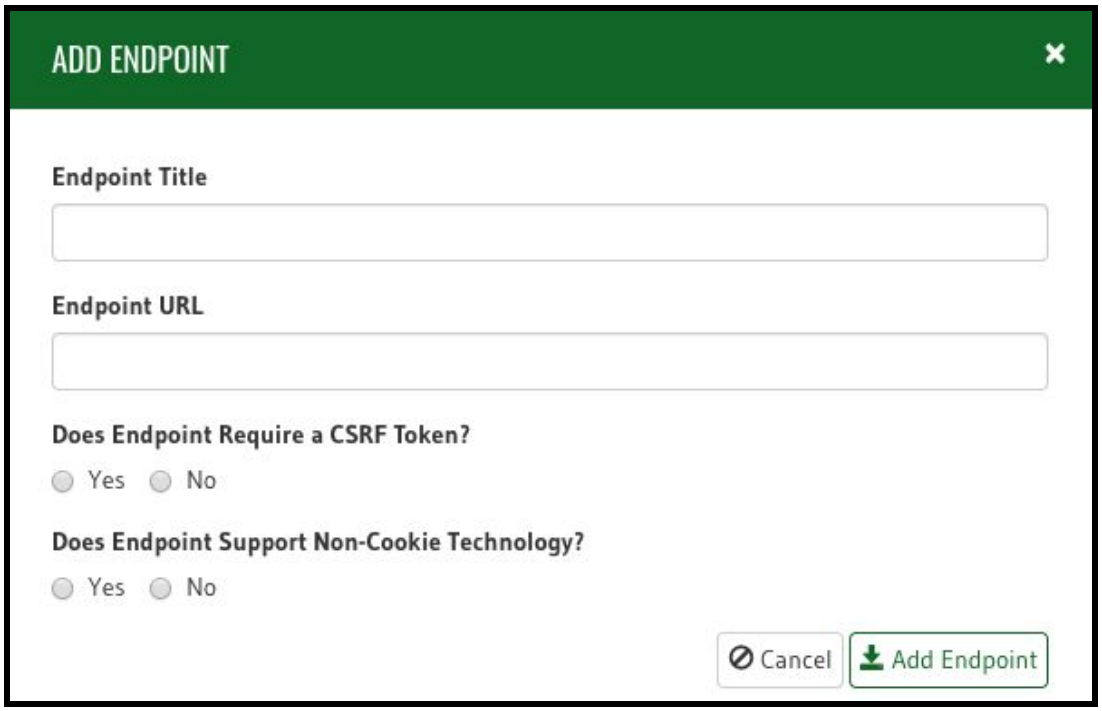


Figure 2. Participants can choose to use their existing IBA Opt Out endpoint established for IBA-purposes or supply a new CCPA-specific Opt Out URL if preferred.

FAQs

For companies already integrated with the DAA and/or NAI industry Opt Out pages, does the CCPA Opt Out Tool allow participating companies to distinguish the two signals?

Yes, participating companies may distinguish opt out requests received from the existing DAA and NAI industry Opt Out pages from opt out requests received from the CCPA Opt Out Tool. Companies choosing to differentiate the signals may do so to maintain flexibility based on the HTTP referer of the Opt Out request.

At the same time, the DAA is seeking to make integrating with the CCPA Opt Out Tool as simple as possible for participating companies. Companies that do not wish to differentiate Opt Out requests are not required to do so (except to the extent they may need to whitelist the new domain - if a domain whitelist is enforced).

However, participating companies should keep the following considerations in mind if they do not differentiate Opt Out requests:

- Participating companies that don't distinguish Opt Out requests will be responsible for interpreting requests from both sets of Opt Out tools in compliance with the CCPA and the existing NAI Code and/or DAA Principles.
- Using the same Opt Out request mechanism will result in users who exercise choice with the CCPA mechanism having that request recognized by the existing opt out tools. A consumer who uses the CCPA Opt Out Tool, and who subsequently visits the DAA or NAI Opt Out page, will be listed as already opted out of having your company “customize ads on this browser.”

For companies that want to differentiate opt outs originating from the CCPA Opt Out Tool, how will the tool support that function?

The current functionality of the tool will allow for at least two options for differentiating CCPA opt outs:

- Payload is added to cookie based on HTTP referer. Because the domain hosting the CCPA Opt Out Tool (privacyrights.info) is distinct from the existing industry opt out domains, companies may elect to deliver a different opt out cookie, or a different value for the same Opt Out cookie, based on differences in the HTTP referer.
- New endpoints are added specifically for receiving CCPA-related opt outs. Like the existing industry Opt Out tool, the CCPA Opt Out Tool will allow companies to define new endpoints, and companies may choose to define new endpoints specifically for the new tool in a way that allows them to differentiate opt out requests.

Operationalizing a distinction between existing industry opt outs and the CCPA Opt Out Tool may be challenging, so if you have other suggestions about how integration might best be

achieved by your or other participating companies, please let us know. We are happy to evaluate possible future changes to the functionality of the tool to accommodate different methods.

Will the CCPA Opt-Out Tool support additional values in the signal? For example, whether or not disclosures were provided to the user?

The functionality of the CCPA Opt-Out tool is currently limited to supporting an opt-out signal.

Is the CCPA Opt-Out Tool an opt out across sites, or just for the specific site the user accessed the CCPA Opt-Out tool from?

The CCPA Opt-Out tool is designed to pass to participating companies a user's signal to out to "sales" across publishers sites for that browser. Publishers participating in this program that sell personal information separately provide users with an opt out of "sales" by the publisher (i.e., a site-specific or publisher-specific opt-mechanism). Opt out signals received by third parties from users through the CCPA Opt-Out tool (cross-site) are separate and distinct from opt-out signals received by third parties from publishers (site-specific).

What if we have a new integration or have additional technical questions?

For new endpoint integration or if you have technical integration questions, please reach out to:
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