



PROTECTING ONLINE PRIVACY THROUGH ENHANCED CONSUMER CHOICE



Mobile App Guidance for Third Parties



DIGITAL
ADVERTISING
ALLIANCE



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The Digital Advertising Alliance (DAA) [Self-Regulatory Principles](#) apply broadly to the diverse entities that work interdependently to deliver relevant advertising to enrich the consumer online experience.

You Should Be Compliant If:

- Your company collects app usage data across non-affiliated apps over time for interest-based advertising (IBA) purposes. Such app usage data is known as Cross-App Data (CAD)
- Your company shares app usage data with non-affiliated companies for their or others' use in IBA
- Your company receives CAD from another party and uses it to engage in IBA
- If your company maintains a website or mobile app, you should review the First-Party guidance documents to determine your compliance requirements

What is Interest-Based Advertising?

IBA is the practice of collecting web viewing behavior and/or mobile app use data from a particular computer or device over time and across non-affiliated websites or mobile apps for the purpose of using such data to predict user preferences or interests to deliver advertising based on the preferences or interest inferred from such data.

What Interest-Based Advertising Is Not?

IBA does not include:

- Contextual advertising (advertising based on a current visit to an online property, the website or mobile app's content, or a search query)
- A First Party's own data collection and use
- Ad delivery (delivery of content, an ad, or ad-related services using ad reporting data)
- Ad reporting (the collection or use of information for statistical reporting, web analytics, and advertising metrics)

Provide Notice on Your Website or Mobile App


Your company should provide notice of your CAD collection and use practices on your website or be accessible from any app from or through which you collect CAD. This notice should be clear, meaningful, and prominent, and should describe the following:

- The types of data collected online, including any personally identifiable information, for IBA purposes
- The uses of such data, including whether it will be transferred to another unaffiliated entity for IBA purposes and whether data collected from that device will be used on a browser or device associated with it, or if data from those associated devices and browsers will be used on that device, for IBA purposes

- An easy-to-use way to exercise choice with respect to the collection and use of data for IBA purposes or transfer of such data to other unaffiliated entities for IBA purposes
- The fact that choice will stop the collection, use, and transfer of data from the device for which or from which choice is exercised for IBA purposes on browsers or devices associated with that device, and the collection, use, or transfer of data from those associated browsers or devices for IBA purposes on the device for which or from which choice is exercised
- The fact that your company adheres to the DAA Principles

Provide Enhanced Notice

In addition to the notice posted on your company's website, you should also provide enhanced notice wherever you collect or use data for IBA purposes on a non-affiliated app. Enhanced notice can be provided by in-app notice or by your participation in industry-approved choice mechanisms such as the DAA's [AppChoices](#). If you implement in-app notice, your company should provide enhanced notice through a clear, meaningful, and prominent link to a disclosure of CAD collection and use practices that is presented through one of the following methods:

- In or around an advertisement delivered using CAD, which could be delivered through the DAA's YourAdChoices Icon  ([which can be licensed from the DAA](#)) or
- If there is an arrangement with the mobile app operator (the First Party) for the provision of such enhanced notice, the enhanced notice should be provided: (1) before the app is installed, as part of the process of downloading an app to a device, at the time that the app is opened for the first time, or at the time CAD is collected; and (2) in the app's settings or any privacy policy

Additionally, you can provide enhanced notice through participation in the industry-developed choice app (DAA's AppChoices Tool) or by being individually listed in the First Party's notice. If you rely on either of these forms of enhanced notice, you should work with the First Party to ensure that it provides the required clear, meaningful, and prominent First Party enhanced notice link in apps and in settings for apps where you collect or use data for IBA purposes. This link should lead directly to the specific section of the First Party's privacy policy or other notice that discusses IBA activity.

Provide Choice

Your company should provide the ability to exercise choice with respect to your collection and use of data for IBA purposes and the sharing of this data with other unaffiliated entities for such purposes. Additionally, choice should stop the collection and transfer of data from the device for which or from which choice is exercised for IBA purposes on browsers or devices associated with that device, and the use of data from those associated browsers or devices for IBA purposes on the device for which or from which choice is exercised.

In all cases, the choice mechanism should be easy to use and should apply to the device from which or for which the choice is exercised on a going forward basis. The DAA's [AppChoices](#) tool is an example of a mechanism that would satisfy the choice requirement, as it allows a user to stop the collection and use of data for IBA purposes. The DAA's AppChoices tool is available in all the major app marketplaces. Your company can integrate into this mobile app to meet your choice requirements for mobile apps.

Credible Accountability

The DAA Principles are enforced by two accountability programs run by the Council of Better Business Bureaus (BBB) and the Data & Marketing Association (DMA). These programs monitor the ecosystem and bring enforcement actions against non-complying companies. [The programs have released more than 80 public enforcement actions.](#) The accountability programs also work with companies to come into compliance.

About the DAA

The DAA establishes responsible privacy practices across industry for relevant digital advertising, providing consumers with enhanced transparency and control through multifaceted principles that apply to Multi-Site Data, Cross-App Data, Precise Location Data, and Personal Directory Data gathered in either desktop or mobile environments, including across associated devices. The DAA is an independent non-profit organization led by leading advertising and marketing trade associations.

Founding Associations

