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# First Party On-Boarding Checklist & Self-Certification

The Digital Advertising Alliance (DAA) has designed this short checklist for companies that own or control a website or app (First Parties) on which unrelated companies (Third Parties) collect and use data for interest-based advertising (IBA). The checklist serves as a guide to First Parties in the DAA onboarding and self-certification process. It is designed to be used in conjunction with the DAA's two other implementation resources for First Parties: [DAA Browser-Based Implementation Guide for First Parties](#) and [DAA Mobile App Implementation Guide for First Parties](#).

You may use this checklist to help your company meet its responsibilities under applicable [DAA Principles](#).

Our goal is to help guide you toward compliance with the DAA Self-Regulation Program. Please note that if you are unsure about the answer to any question presented in this document, the DAA team and/or its independent enforcement agents are available to provide you with assistance. Furthermore, any proactive inquiry received by [our Accountability Entities](#) will be treated confidentially and will not be used as the basis of a compliance action.

The success of self-regulation depends on industry-wide participation and compliance. We appreciate your company's participation and compliance with the DAA Principles.

**Note: Even Third-Party organizations can act as First Parties when they allow unrelated companies to collect data for IBA on their digital properties.**

## Section 1: IDENTIFY/CONFIRM YOUR ROLE IN IBA

### **1. Are there any unrelated companies that you are aware are collecting data for use in IBA on a website or app that you own or control?**

- ✓ To verify, check whether you have any contracts with unrelated companies that allow those companies access to your websites/apps for collection and use of data for IBA, whether anyone in your company granted an unrelated company access to your website/app in exchange for access to a free service, and whether any company that you have given permission to collect data for analytics or other permitted purposes is also using that data for IBA.
- ✓ You may want to ask for assistance from your IT/Web/UX departments in checking for unrelated parties on your website/apps. You can also use a service that can detect the presence of third parties on your website and determine whether they are likely engaged in IBA, or you can use a reputable plug-in that identifies companies on your digital properties. Alternatively, the DAA makes available Approved Providers of compliance services, who can assist in this process. These Approved Providers' Assurance Platforms have been approved – but are not required to use – as a method for providing evidence of compliance.


## Section 2: TRANSPARENCY – ENHANCED NOTICE


**2. On every page of your website where an unrelated company is collecting data for use in IBA, are you providing an enhanced notice link that takes consumers directly to your IBA notice?**


- ✓ This notice is called the enhanced notice link because it gives consumers real-time notice that collection and use for IBA is occurring on that site and takes them directly to the place where they can learn more and find out how to exercise their own choice about IBA.
- ✓ Make sure that your IT/Web/UX department(s) understands that this link must be present on every page; that the team checks for link or anchor breakage; and that the enhanced notice link is checked and replaced every time the website is revised, redesigned or updated.

**3. Is this enhanced notice link separate and distinct from other website notices?**


- ✓ For example, the enhanced notice should NOT be combined with or only part of the privacy policy notice.

**4. Do you serve the YourAdChoices Icon [  ] in your IBA ads? If so, you should ensure that the icon links to a notice branded and controlled by you even if it is being handled by another party ([through an Approved Provider, for example](#)).**

**5. Does the enhanced notice link use one of these three standard phrases: “AdChoices,” “Interest-based Ads,” or “Why Did I Get This Ad?” Do you display the Your AdChoices Icon [  ] when you serve interest-based ads?**

- ✓ We recommend that in addition to using one of these three standard phrases, you use the YourAdChoices Icon [  ] a signal that consumers recognize as notification of IBA. This icon has been served trillions of times and acts as a consumer-friendly device for communicating about IBA.

**6. On a mobile app that you own or control do you provide enhanced notice *either* on the application market store page of your app before an app is installed, *or* during the process of downloading, *or* before the application is opened for the first time, *as well as* in the app’s settings or any privacy policy?**

- ✓ For example, we have seen many in-market implementations that use the YourAdChoices Icon [  ] in the settings of the app so that it is available in real time to consumers.
- ✓ If you wish to provide enhanced notice in the app’s page in an application marketplace such as Google Play and you are limited in the information you can provide on that page, you may include the enhanced notice link in the privacy policy link as long as that link directs the consumer to the IBA notice in your privacy policy.

### Section 3: TRANSPARENCY – NOTICE

7. Is your IBA notice in a clearly marked section of your privacy policy or in a stand-alone notice separate and distinct from other information, and does your enhanced notice link take the consumer directly to the IBA notice?
8. Does your notice explain your IBA practices, including that unrelated entities collect or use information for that purpose on your property?
9. Does your notice state that you adhere to the Digital Advertising Alliance Principles?
10. Does the notice explain to consumers how they can exercise choice about whether or not to participate in IBA?
11. Does your notice provide a link directly to a place where the consumer can exercise choice? You may use *any* of the three methods listed here:
  - ✓ Provide and keep up-to-date a list of unrelated companies that you allow to collect data from your web site or app with a link to each company’s choice mechanism.
  - ✓ If you use an approved provider (TrustArc or Crownpeak) to provide the links to the choice mechanisms of the companies you allow to collect data on your website or app, provide your approved provider with an updated list of these companies with links to their choice mechanisms.
  - ✓ You may provide a link that takes the user directly to the relevant industry-developed choice mechanism such as [YourAdChoices](#) / [WebChoices](#) / [AppChoices](#) ?

### Section 4: CONTROL AND CHOICE

12. Do unrelated companies engage in IBA across websites or applications you own or controls? If so, do you provide a method for a consumer to exercise choice on each website/app on which IBA is occurring?
13. Are you ensuring that any opt-out signal for IBA data collection has at least a five-year duration once it is set?
14. If you are working with an approved provider (currently TrustArc or Crownpeak) do you ensure that the approved provider is furnishing a link to each party’s choice mechanism?
  - ✓ As a complement to working with Approved Providers in this way, companies can also ensure that they and/or their Approved Providers link to the industry choice tools at:
    - YourAdChoices (Token-Based Opt-Out/Revocation): <https://youradchoices.com/token/>
    - WebChoices: <https://optout.aboutads.info/>
    - AppChoices: <https://youradchoices.com/appchoices>
    - DAA CCPA Opt Out Tool: <https://optout.privacyrights.info/>

15. If you are using an industry-developed control mechanism, are you pointing the consumer from your website or app to the appropriate tool such as [YourAdChoices](#) / [WebChoices](#) / [AppChoices](#) ?
16. If you are listing each unrelated party collecting data for IBA on your website, do you provide an up-to-date link to each party's choice mechanism?
17. If you are a mobile app publisher and you point users to operating-system level opt-out tools for IBA, do these tools offer the ability to opt-out of third party collection and are those tools adequately explained or accompanied by links/resources that explain to the consumer how to use those tools?
18. If you are a web publisher and you point users to browser-based opt-out tools, do you explain the scope of a browser-based opt-out explain the scope of browser-based choice and how to access and use these tools?

## **Section 5: TRANSPARENCY AND CHOICE FOR PRECISE LOCATION DATA**

19. On a mobile app that you own or control, if you transfer precise location data (PLD) to an unrelated party, or allow an unrelated party to obtain access to precise location data through an SDK [software development kit] or by other means, do you provide a PLD notice in your websites or accessible from your app's settings?
20. Does this PLD notice describe the fact precise location data is transferred to or collected from your app by an unrelated party?
21. Does your PLD notice include instructions for accessing a tool, using the device, operating system or platform settings for providing or withdrawing consent for the collection of precise location data?
  - ✓ For example, withdrawing consent by using tools provided by major operating systems that allow you to provide or withdraw consent on an app-by-app basis; uninstalling the app; or any other tool, such as the [DAA's AppChoices Tool](#), that allows consumers to withdraw consent for the collection and use of precise location data with respect to a specific application, without changing their preferences for other applications, such as the DAA AppChoices Tool.
22. Does this PLD notice state your adherence to the DAA Principles?
23. Do you provide enhanced notice that alerts the consumer to the fact that PLD may be collected by or transferred to a third party?
24. Is the precise location data (PLD) enhanced notice provided to the consumer at either the time the application is downloaded, at the time the application is opened, or at the time PLD is first collected?
25. Does this enhanced notice include a link that takes the consumer directly to your PLD notice?

## **Section 6: SPECIAL DATA CATEGORIES REQUIRING PRIOR CONSENT**

- 26. If you collect, transfer or allow an unrelated party to collect personal directory data for IBA from a site or app you own or control, do you obtain prior affirmative consent before such collection or transfer?**
- ✓ Personal directory data includes a calendar, address book, phone/text log, or photo/video data created by a consumer.
- 27. If you transfer precise location data to an unrelated party for IBA, allow an unrelated party to obtain access to precise location data through an SDK or by other means, do you obtain affirmative consent from each user prior to the collection by or transfer to a third party?**
- 28. If you collect, transfer or allow a third party to collect sensitive financial or health information for IBA, do you obtain affirmative consent before the collection or transfer?**
- 29. Are you aware of and compliant with any obligations you may have under the Children’s Online Privacy Protection Act?**

## **Section 7. TRANSPARENCY AND CHOICE FOR DATA USED ACROSS DEVICES**

- 30. If you are engaged in cross-device tracking, do you disclose this fact to users in your notice of your IBA data use practices (e.g., on your website’s IBA notice)?**
- ✓ Cross-device tracking includes both cross-site and cross-app data collected from a particular browser or device for use on a different browser or device or transferred to a non-affiliate for IBA purposes.
- 31. Do you provide a disclosure of cross-device tracking on each linked device?**
- 32. In your disclosure do you provide a way for a consumer to exercise choice from the device on which the data is collected?**
- ✓ The disclosure should include a link to an industry-developed choice mechanism or to a list of each third party collecting data for IBA purposes that links to each party’s choice mechanism.
- 33. Do you explain the scope of the choice exercised on that device?**
- ✓ When a consumer exercises choice from a browser or device, no IBA data from that device may be transferred to any other linked device and no IBA data collected on another device may be used for IBA on the device on which the consumer exercised choice.
  - ✓ Under the Principles, as long as you explain the scope of the choice, you are not required, but you may choose, to opt the consumer out of the collection and use of data from other linked devices unless choice is exercised on that device.

## **Section 8: MAKING SURE THE COMPANIES YOU WORK WITH ARE COMPLIANT**

### **34. Are you taking steps through contract or other means to ensure that all the companies you work with are compliant with the DAA Principles?**

- ✓ When you hire an agency or other third party to run your interest-based ad campaign, make sure that they can support your DAA compliance.
- ✓ When you allow a company to advertise on your website or app, make sure that they use the AdChoices Icon when required.
- ✓ Make sure that you collaborate, cooperate, and communicate clearly with all companies so that each entity knows what responsibility it has for providing compliant notice and choice to consumers. Clear communication protects your brand from compliance risks. Review companies listed on the following sites/pages/apps as a good place to begin when vetting advertising partners:
  - DAA Participants: <https://digitaladvertisingalliance.org/participating>
  - YourAdChoices Participants: <https://youradchoices.com/token/>
  - WebChoices Participants: <https://optout.aboutads.info/>
  - AppChoices Participants: <https://youradchoices.com/appchoices>
  - DAA CCPA Opt Out Participants: <https://optout.privacyrights.info/>

### **35. If you use an Approved Provider (currently TrustArc or Crownpeak) to provide notice and choice on your behalf, do you provide them with a list of all third parties collecting data for use in interest-based advertising on your website or app?**

- ✓ Make sure that you pass along a working link to the third party's opt-out mechanism to your approved provider.
- ✓ Make sure you keep the list up-to-date and provide it to your approved provider on a regular basis.
- ✓ As a complement to working with Approved Providers in this way, companies can also ensure that they and/or their Approved Providers link to the industry choice tools at:
  - YourAdChoices (Token-Based Opt-Out/Revocation): <https://youradchoices.com/token/>
  - WebChoices: <https://optout.aboutads.info/>
  - AppChoices: <https://youradchoices.com/appchoices>
  - DAA CCPA Opt Out Tool: <https://optout.privacyrights.info/>

## **Section 9: ADDITIONAL COMPLIANCE SUGGESTIONS - ENTERPRISE TRAINING**

**36. Provide an online or in-person short "lesson" about DAA compliance to all relevant departments, including legal, marketing and IT [information technology].**

- ✓ There should be a designated point person in departments with any interaction with DAA requirements.
- ✓ Make sure IT/Web/UX understands and fulfills the technical requirements. Keep them in the loop. Make sure that they:
  - Understand what is needed in the DAA notice link; and
  - Where the notice link should take the consumer; and,
  - Set the opt-out choice offered to the user for a five-year period.
- ✓ Additionally the IT team should:
  - Check periodically for broken links or anchors associated with links to notices and choice options; and,
  - Make sure that any revision of the website/app includes updating and testing of notices and choice options, including any link offered to the DAA opt-out tools ( [YourAdChoices](#) / [WebChoices](#) / [AppChoices](#) ); and
  - Make sure that the DAA notice is not obstructed by other notices (for example, a cookie banner).
  - For app publishers, where location data is being shared or collected by unrelated companies, make sure to not only rely on system-level permissions tools for precise location enhanced notice if these tools don't reference collection by unrelated parties.

## **Section 10: CONTACT INFORMATION FOR DAA COMPLIANCE INQUIRIES**

**37. Please provide name, address, email and phone number for the person your company has designated as your DAA contact – [and share that contact with the DAA Team](#). Keeping this information up-to-date ensures that the DAA and our Accountability Partners can reach you promptly. Your prompt cooperation in the case of a compliance inquiry helps to ensure a speedy resolution of any questions protects you from referral to the Federal Trade Commission (or other government agency of jurisdiction) for non-cooperation with self-regulation.**

A third-party certification is not a current requirement of the Digital Advertising Alliance Principles adherence in the United States. Only a self-certification of adherence is required as of this time.

Please do not hesitate to contact the DAA if you have any questions.

## **Additional First-Party Resources | Icon & Ad Marker Creative Guidance**

### **First-Party Mobile App Guidance:**

[https://digitaladvertisingalliance.org/DAA\\_style/ADS/DAA\\_1st\\_Party\\_Mobile\\_App\\_Guidance.pdf](https://digitaladvertisingalliance.org/DAA_style/ADS/DAA_1st_Party_Mobile_App_Guidance.pdf)

### **First-Party Web Guidance:**

[https://digitaladvertisingalliance.org/DAA\\_style/ADS/DAA\\_1st\\_Party\\_Web\\_Guidance.pdf](https://digitaladvertisingalliance.org/DAA_style/ADS/DAA_1st_Party_Web_Guidance.pdf)

### **YourAdChoices Icon & Ad Marker Creative Guidelines:**

[https://digitaladvertisingalliance.org/sites/aboutads/files/DAA\\_files/YAC\\_Icon\\_AdMarker\\_Creative\\_Guidelines.pdf](https://digitaladvertisingalliance.org/sites/aboutads/files/DAA_files/YAC_Icon_AdMarker_Creative_Guidelines.pdf)

### **YourAdChoices Icon & Ad Marker Creative Guidelines for Mobile:**

[https://digitaladvertisingalliance.org/sites/aboutads/files/DAA\\_files/YAC\\_Icon\\_AdMarker\\_Creative\\_Guidelines\\_Mobile.pdf](https://digitaladvertisingalliance.org/sites/aboutads/files/DAA_files/YAC_Icon_AdMarker_Creative_Guidelines_Mobile.pdf)

### **YourAdChoices Icon & Ad Marker Creative Guidelines for Video:**

[https://digitaladvertisingalliance.org/sites/aboutads/files/DAA\\_files/YAC\\_Icon\\_AdMarker\\_Creative\\_Guidelines\\_Video.pdf](https://digitaladvertisingalliance.org/sites/aboutads/files/DAA_files/YAC_Icon_AdMarker_Creative_Guidelines_Video.pdf)

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