



DAA's Self-Regulatory Program for Online Behavioral Advertising

– Frequently Asked Questions –

1. What is the Digital Advertising Alliance?

The Digital Advertising Alliance (DAA) is a self-regulatory body that develops industry best practices and effective solutions for consumer choice in online behavioral advertising (OBA). It was created in 2009 by a consortium of the nation's largest media and marketing associations including the American Association of Advertising Agencies (4As), the Association of National Advertisers (ANA), the American Advertising Federation (AAF), the Direct Marketing Association (DMA), the Interactive Advertising Bureau (IAB) and the Network Advertising Initiative (NAI). These associations, with support from the Council of Better Business Bureaus (CBBB), are committed to developing effective self regulatory solutions to consumer choice in online behavioral advertising (OBA).

2. What is the Self-Regulatory Program for Online Behavioral Advertising?

The DAA's Self-Regulatory Program for Online Behavioral Advertising is designed to give consumers enhanced control over the collection and use of data regarding their Internet viewing for OBA purposes.

The Program is based on the seven Self-Regulatory Principles for Online Behavioral Advertising released in July 2009. These Principles correspond with tenets proposed by the Federal Trade Commission in February 2009, and also address public education and industry accountability issues raised by the Commission. The Principles are designed to address consumer concerns about the use of personal information and interest-based advertising while preserving the innovative and robust advertising that supports the vast array of free online content and the ability to deliver relevant advertising to consumers.

With the support of its six, stakeholder trade associations the Self-Regulatory Program promotes the use of the Advertising Option Icon, (known more commonly as the "ad choices" icon), a universal symbol found within or near online advertisements or on Web pages where data is collected and used to deliver online advertising that is based on inferences derived from the collected data. By clicking on the Icon, consumers are able to link to a clear disclosure statement regarding the participating company's online behavioral advertising data collection and use practices, as well as a universal, easy-to-use, opt-out mechanism.

3. What is online behavioral advertising?

Online behavioral advertising (OBA) is defined as the practice of collecting data from a particular computer or Internet viewing device (e.g., smart phone, tablet, etc.) regarding Web viewing behaviors over time and across non-affiliated Web sites for the purpose of using such data to predict user preferences or interests to deliver advertising to that computer or device based on the preferences or interests inferred from such Web viewing behaviors. The purpose of OBA is to deliver relevant or targeted advertising to specific computers or devices in ways that enrich the consumer online experience.

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As defined in the Self-Regulatory Principles for Online Behavioral Advertising (“Principles”), OBA does not include:

- The activities of First Parties (Web site publishers / operators) that are limited to their own or affiliated sites.
- Ad delivery (i.e., delivery of online advertisements or advertising-related services using Ad Reporting data and not based on user preferences inferred from information collected over time and across non-affiliated Web sites);
- Ad reporting (i.e., the collection or use of information for statistical reporting, Web analytics/analysis and advertising metrics); or
- Contextual advertising (i.e., advertising based on the content of the Web page being visited, a consumer’s current visit to a Web page, or a search query).

Also see - <http://www.aboutads.info/principles>

4. Is it mandatory for an organization engaging in OBA to participate in the DAA's Self-Regulatory Program for Online Behavioral Advertising and abide by the “Principles”?

Any company that is currently engaged in OBA, at any volume, is strongly encouraged to participate in the DAA's Self-Regulatory Program. is a collaborative effort by the advertising industry to provide solutions that give consumers more information and choices around interest-based advertising. Some trade associations, like the DMA, have made participation in the DAA's Self-Regulatory Program a condition of membership. Other trade associations have strongly encouraged their members to participate and have assisted them with detailed information kits and webinars.

5. The term “online tracking” has been used broadly in news coverage and by government regulators. How does online tracking relate to the DAA's Self-Regulatory Program for OBA?

“Tracking” as a term used in relation to online advertising or marketing is confusing, as it can potentially refer to different types of activities. So, it is important to be both clear and precise regarding the types of activities that are covered by our Program.

The DAA's Self-Regulatory Program for OBA is specifically related to a company's collection of data from a computer or device specific to Web-viewing behaviors over time and across non-affiliated websites – solely for the purpose of using such data to deliver targeted advertising to that computer or device. The targeted advertising that is delivered is based on the preferences or interests inferred from those Web viewing behaviors.

6. Companies leverage the online browsing behaviors of consumers for different purposes. Does the consumer-opt-out option that is a part of your Program preclude or prevent “tracking”?

The DAA's Self-Regulatory Program for OBA is specifically related to a company's collection of data from a computer or other Internet viewing device specific to Web-viewing behaviors over time and across non-affiliated websites – solely for the purpose of using such data to deliver



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targeted advertising to that computer or device. Companies participating in the DAA's Self-Regulatory Program cannot collect said data for the purposes of delivering targeted ads to a user after they have opted out. Doing so would put them in violation of the Self-Regulatory Principles for OBA and the Program guidelines.

"Tracking" is a term commonly employed by various industry observers to describe a broad set of online activities. The DAA program is squarely focused on the collection and use of data in connection with OBA. For example, the Self-Regulatory Principles do not apply to the data collection and use practices that companies employ on their own websites, for their own purposes. (Also, see [Principles FAQ](#)).

- 7. If a user opts-out of an OBA campaign and the company that delivered the OBA campaign (a DAA program participant) continues to collect user data for purposes other than OBA, is that company in violation of the DAA's Self-Regulatory Program for OBA?**

No. If a user opts-out of receiving targeted ads and the company continues to collect data regarding Web viewing behavior for other purposes, it is not in violation of the Self-Regulatory Program. However, if the company continues to track for purposes of OBA and continues to send targeted ads to the user who has opted out, then it is in violation of the Self-Regulatory Program guidelines and will be subject to disciplinary action.

- 8. Does the DAA's Self-Regulatory Program for OBA also cover mobile phones?**

No. The DAA's Self-Regulatory Program for OBA is dedicated to consumer choice for targeted Internet-based advertising only. The DAA has created a committee which is currently developing self-regulatory principles for OBA on mobile platforms. The DAA Mobile OBA principles are expected to be announced by the end of the year.

- 9. If an online advertiser predominantly does contextual targeting, would they still want to participate in the DAA's Self-Regulatory Program for OBA, as a statement of responsibility?**

If companies are directly and actively gathering any kind of end user/consumer data in delivering a targeted advertisement, they are likely doing some form of OBA and are strongly encouraged to participate in the DAA's Self-Regulatory Program. This will enable them to deploy the Advertising Option Icon, deliver a click-through destination page that explains what sort of advertising the company is delivering, and offer consumers the choice to opt-out.

Even if a company's online marketing efforts doesn't rise to the threshold of a full OBA campaign, it would certainly be prudent to "sign and deploy" the Icon – especially if data beyond a basic Web page address is being used in any way to target a given ad or campaign.



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10. When an online advertiser participates in the DAA's Self-Regulatory Program for OBA, who sets up the opt-out page that consumers link to? Is this the role of DAA? Or is this something handled by a DAA "approved provider" (such as DoubleVerify, Evidon or TRUSTe)?

An advertiser seeking to participate in the DAA's Self-Regulatory Program may do so in one of three different ways:

1. Engage with the DAA directly (i.e., sign up for the Program and Advertising Option Icon certification), but run / serve the Icon-enabled OBA campaign itself (DAA offers no such ad delivery on behalf of participant companies); or,
2. Retain a DAA "approved provider" such as DoubleVerify, Evidon or TRUSTe to deploy and manage the Icon-enabled OBA campaign on the advertiser's behalf; or,
3. Engage with an ad network or ad agency to deploy and manage the Icon-enabled OBA campaign on the advertiser's behalf

All three examples described above require the advertiser to sign and comply with the DAA Self-Regulatory Principles for OBA (via the DAA Advertising Option Icon certification agreement). Additional parties (such as the ad network or ad agency) may also be required to sign. The DAA-approved technology providers are already signed with DAA relative to the OBA principles and are explicitly authorized by DAA to serve the Advertising Option Icon.

11. How much does it cost to participate in the DAA's Self-Regulatory Program for OBA?

The DAA Advertising Option Icon certification costs \$5,000 per year and is payable directly to the DAA, a 501(c) (6) not-for-profit corporation. These certification fees are utilized for the ongoing management, distribution and improvement of the entire DAA Self-Regulatory Program, as well as to support industry and consumer outreach and education on OBA issues.

There is no fee for web publishers with annual revenues from online behavioral advertising of less than \$2 million.

If a company decides to engage a DAA-approved provider (such as one of the DAA's approved technology partners), there will also be fees related to CPMs. These fees will vary by provider and can further depend on campaign volume as well as the overall nature of an advertiser's needs relating to delivery and reporting. The DAA is responsible only for certifying compliance with its OBA practice principles – as well as for ensuring the integrity of the Advertising Option Icon as the public-facing seal that certifies this compliance and which offers consumers choice in OBA.



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12. What if a company cannot afford the certification and technology costs for the Advertising Option Icon? Doesn't this defeat the broader purpose of the Program, which is to ensure that these standards are widely disseminated and widely followed?

There is no fee for web publishers with annual revenues from online behavioral advertising of less than \$2million. Additionally, participating ad companies such as [Quantcast](#), offer, for free, the Advertising Option Icon to small publishers (that are part of their networks) with annual OBA revenues under \$2 million and total annual revenues under \$15 million. While the certification fee has been waived in these cases, use of the Icon must comply with the DAA's Self-Regulatory Program guidelines.

13. How does the DAA know if a participating company is in violation of the DAA's Self-Regulatory Program?

All participating companies must follow the [Self-Regulatory Principles for OBA](#).

It is important to note, however, that the specifics of Program compliance vary from "First Parties" (such as Web site publishers / operators) to "Third Parties" (such as advertising networks and data companies including ad exchanges, data aggregators and in some cases advertisers) to "Service Providers" (such as any internet access provider, search engine, Web tool bar, browser or other service that enables the provider to have access to all URLs accessed by its users).

There are several ways a participating company can be in violation of the Self-Regulatory Program. The most conspicuous signs of non-compliance include:

- Misplacement or misuse of the Advertising Option Icon and Consumer Opt-Out page in the ad creative
- Users continuing to receive target ads by an advertiser after they have opted-out
- Advertisers continuing to track users for OBA, after they opt-out

14. How is the DAA handling enforcement? What are the consequences for those who do not comply?

The CBBB, along with the DMA, are responsible for monitoring and enforcing compliance, as well as managing consumer complaint resolution. Both the CBBB and DMA are using a technology platform that enables them to scrutinize companies' compliance and identify potential red flags.

Additionally, participating companies must report their compliance status, in accordance with the Principles. Companies must demonstrate that they are in compliance with the Principles or that they are on a commercially reasonable path to compliance. In particular, companies must show that they are providing consumers with notice of OBA collection and use, and, where



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applicable, displaying the DAA's Advertising Option Icon and offering consumers choice through the easy-to-use opt-out mechanism.

15. What is the current rate of adoption of the DAA Self-Regulatory Program?

Adoption of the DAA's Self-Regulatory Program for Online Behavioral Advertising is currently growing at an average rate of 55 percent, month over month. As of August 2011, more than 240 companies are participating in the Program, including ten of the largest ad networks. To date, well over two trillion online ads have displayed the DAA Advertising Option Icon.

16. There seems to be many different and disparate data points cited in the new media regarding adoption and use of the DAA Self-Regulatory Program and Advertising Option Icon. Why is this the case?

Currently, many of the DAA's technology partners and participating ad companies release their own data relating to the delivery and use of the DAA Advertising Option Icon. However, this information reflects their specific work with the Self-Regulatory Program and does not depict the entire OBA universe. The DAA is currently accumulating and reviewing all this data, as well as conducting its own research, and hopes to provide an overall Program report in the near future.