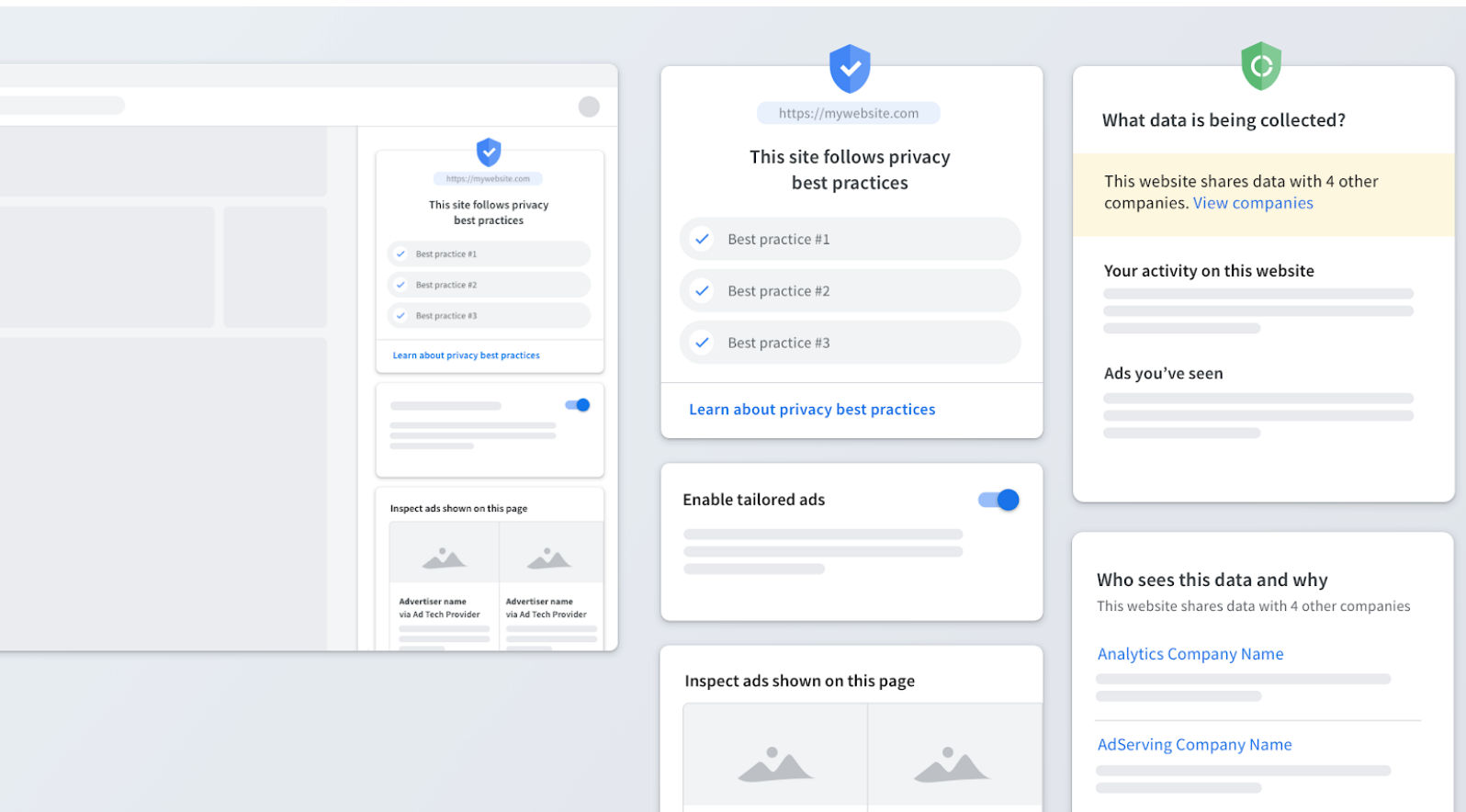


PROPOSAL

# Giving users more transparency, choice and control over how their data is used in digital advertising

Version: 1.0, August 2019



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## GOAL OF THIS DOCUMENT

Start a discussion with the industry about how to enhance the online privacy of users—including best practices for how to make ads relevant and how to protect users against measures that don't respect their privacy.

While we will prioritize user input to shape the best practices, we're committed to gathering feedback on the contents of this document from key stakeholders, including industry groups, privacy advocacy groups, advertisers, publishers, ad tech providers and other technology companies. We envision that this document will evolve as we collect and consolidate feedback from everyone. We will keep track of changes in the version notes.

## Version notes

1.0	Initial proposal

## PROLOGUE

Advertising has made open access to quality information on the web possible—ads underwrite the great content and services that people get for free, they support a universe of creators and publishers, and they enable businesses of all types and sizes to connect with people interested in what they have to offer.

But the open, ad-supported internet is at risk if digital advertising practices don't evolve to reflect people's changing expectations for privacy.

For many people, the digital advertising ecosystem is complex and opaque. They don't feel that they have enough visibility into, and control over, how their data is being used for ads, including what data is collected, who is collecting it, and with whom it's being shared.

That's why we want to work with others in the industry to explore measures that will give people the privacy that they expect. And based on what we've heard so far from our users and industry partners, we believe that our discussions should be grounded on **three principles**:

- First, users should have **transparency**. They should be able to easily see and understand how their data is being collected and used for ads.
- Second, users should have **choice**. Their choices about how they experience the web should be respected and any attempts to bypass those choices should be prevented.
- And third, users should have **control**. They should have the ability to adjust how their data is collected and used to tailor the ads they see, including whether those ads are personalized at all.

Certain proposals to enhance user privacy that have recently been introduced fall short of their stated intention because they don't address the needs of the entire ecosystem, and therefore are being undermined by some parties.

For example, efforts that attempt to block cookies have only encouraged some companies to move their user-tracking efforts underground, using more opaque methods that subvert cookie controls. These methods, such as fingerprinting, are

neither transparent nor under the user's control, and result in tracking that doesn't respect user choice.

So we're inviting others to work with us to determine how best to give people the privacy they expect online, while still preserving access to the free and open web.

# 01

## A proposal to enhance transparency, choice and control in digital advertising

*These proposals should serve as a starting point to an industry-wide discussion on how to provide users the best privacy experience while preserving an open and free internet made possible by digital advertising.*

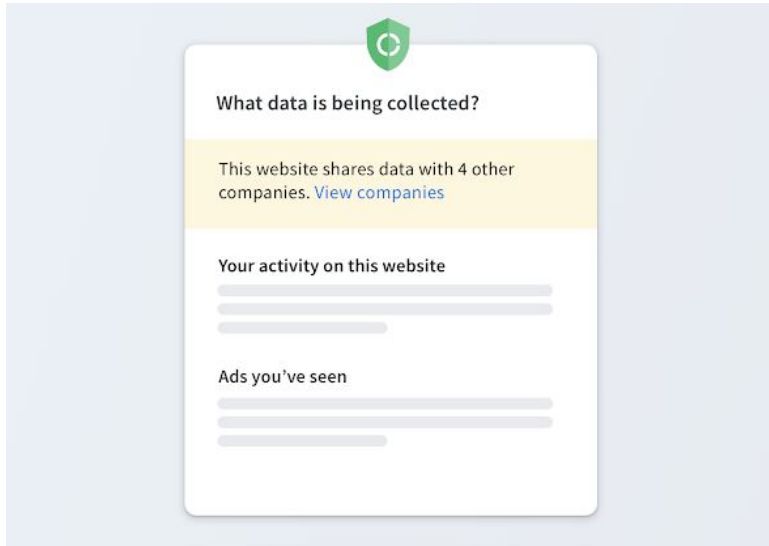
### **1.1 We propose that users should be able to see and control:**

- What data is being collected, by whom and why
- Who is responsible for an ad, and
- What caused an ad to appear

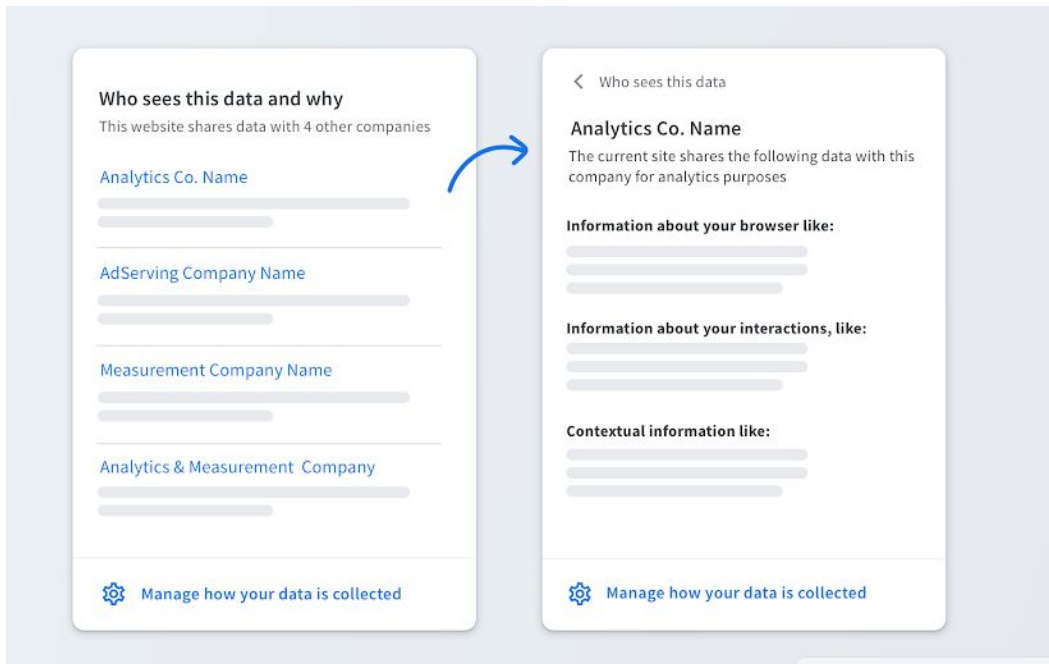
#### **What data is being collected, by whom and why**

Users should be able to see and understand the types of data that are being collected about them, where that data collection is taking place, who is collecting that data and for what purpose, and with whom that data is being shared.

The images that follow are for illustrative purposes only.



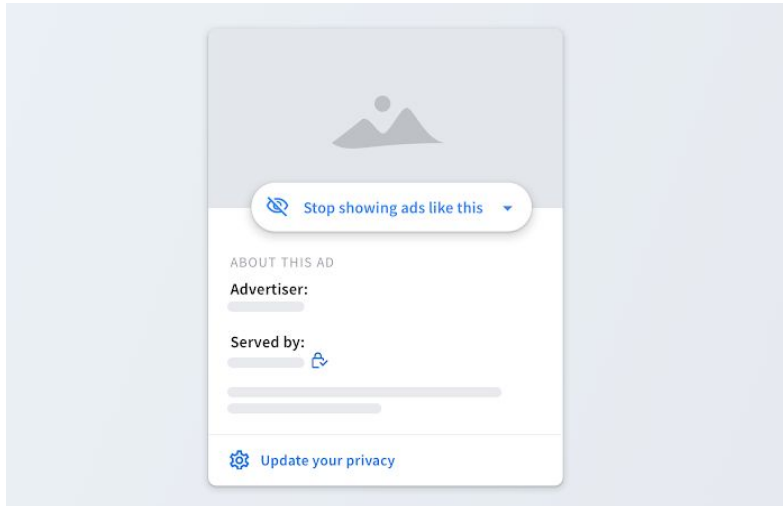
Img 1. Illustration only



Img 2. Illustration only

## Who is responsible for an ad they're seeing

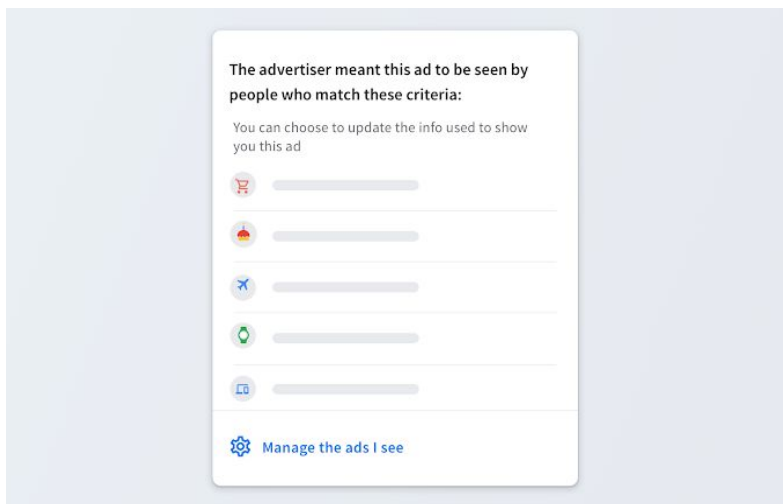
Users should be able to understand who's involved in showing an ad and who's involved in using their data for the purposes of advertising (including the ad platform that ran the ad). Also, users should be able to control who is collecting data about them for the purposes of personalized advertising.



Img 3. Illustration only

## What caused an ad to appear

Users should be able to understand why they encountered an ad, such as the criteria that were used to decide who should see the ad. Users should also be able to control what types of information are used to tailor ads for them.



Img 4. Illustration only



## **1.2 We propose that practices that do not respect user privacy and attempts to bypass user choices should be prevented.**

Practices that weaken or take away a user's ability to see what data is collected or control how it is used should be prevented. An example of this type of practice is fingerprinting.

### **Fingerprinting**

Fingerprinting is when pieces of information about a user, such as the user's device and browser settings, are used to identify and track the user. While we support fingerprinting as a measure that can enhance a user's security (by authenticating the user, for example), we believe that we should protect users against fingerprinting for purposes of ad tracking. For example, when a user opts out of third-party tracking on the web, some companies try to work around this preference with fingerprinting. We believe this does not respect the user's choice for privacy and should not be allowed for ads personalization.

# 02

## How users could access the information and controls

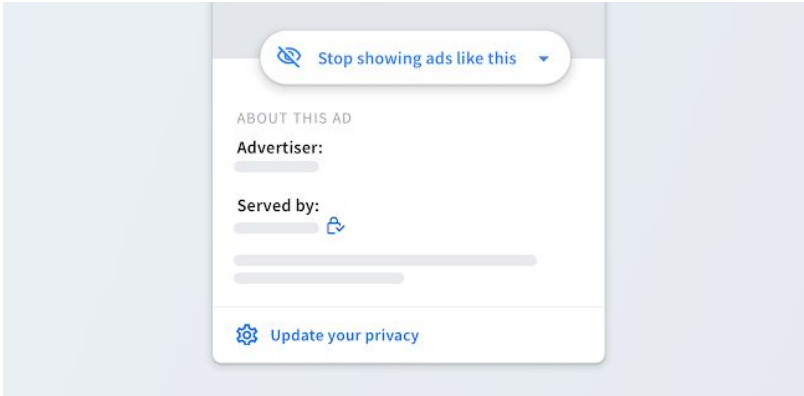
Users should have easy access to information about the ads they see in order to control how their data is used for advertising. We propose that users should have the ability to access this information at key levels:

- Individual ad
- Webpage
- Website
- Browser, and
- Ecosystem

The images that follow are for illustrative purposes only.

## At the individual ad level

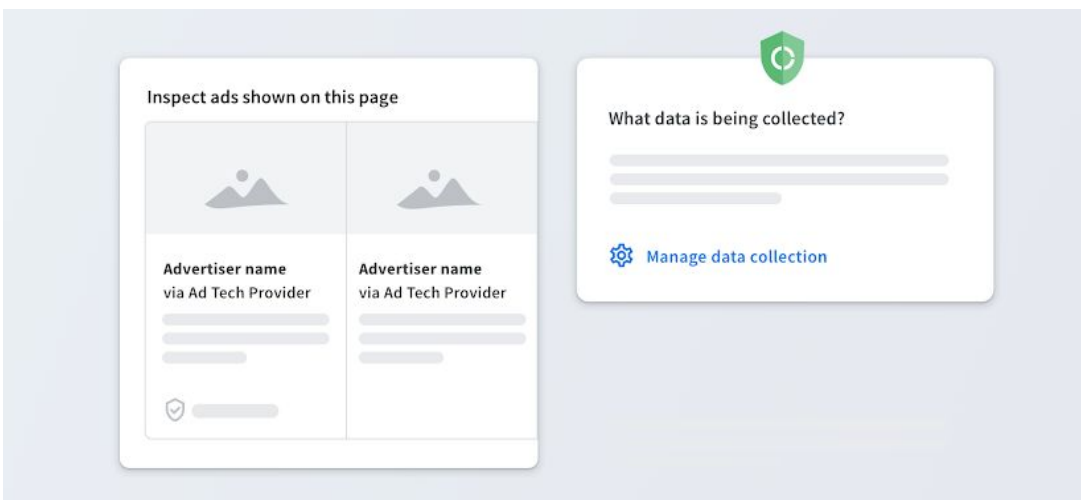
Users should be able to view an ad’s metadata directly from the ad, including who paid for the ad, who served the ad, and what criteria were used to determine the ad’s relevance. They should also be able to manage the information used to tailor the ad, including who has permission to access that information and how it could be used to inform other ads they see.



Img 5. Illustration only

## At the page level

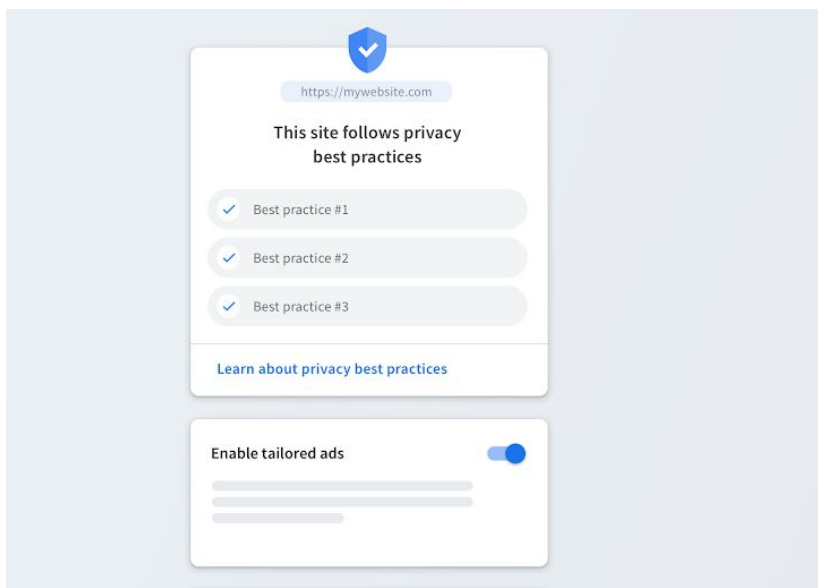
When visiting a webpage, users should be able to have visibility into and control over what data is being collected on that page and what kind of ads they’d prefer to see there.



Img 6. Illustration only

## At the website level

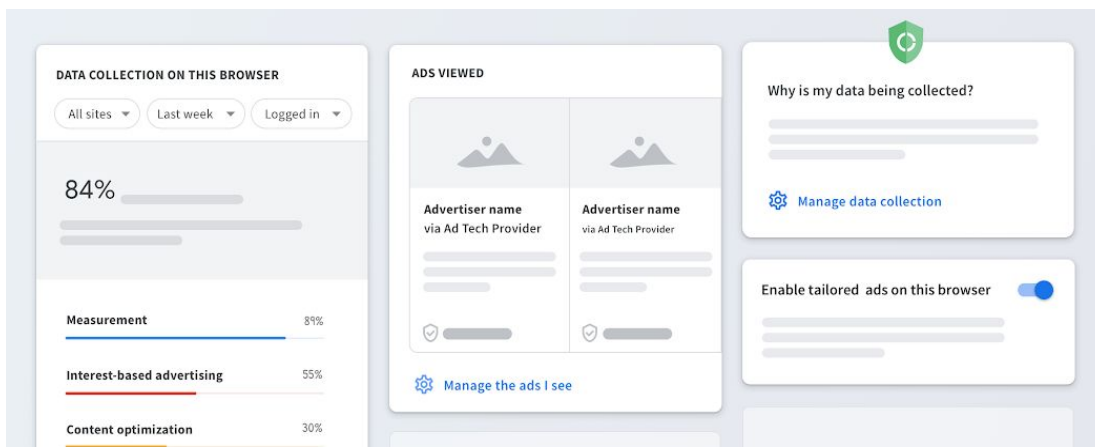
Users should be able to view a summary of all the data that was collected and ads that appeared across the pages they visited on a website. They should also be able to control how that data is being collected and adjust their ad experience for the website.



Img 7. Illustration only

## At the browser level

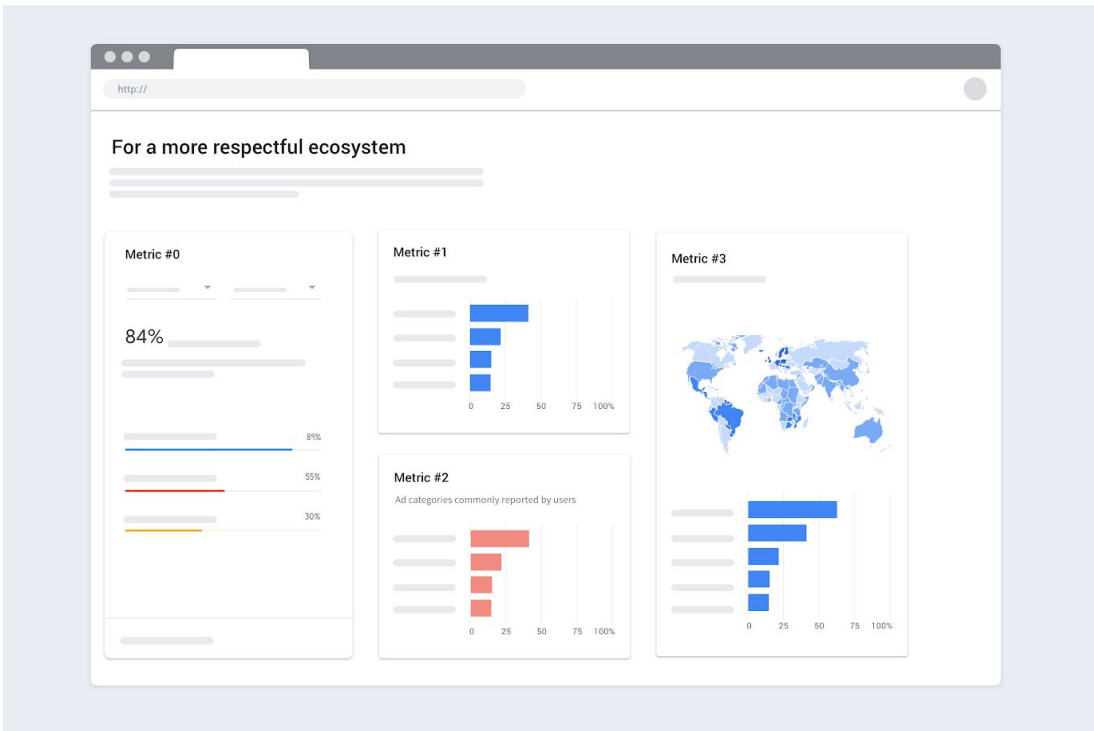
Users should get visibility into and control over how their data is collected and potentially the types of ads they see, aggregated for all websites visited over a period of time while using a particular browser.



Img 8. Illustration only

## At the ecosystem level

We also believe that making this type of information available publicly will help increase transparency at the ecosystem level. We think researchers and others should be able to view and analyze aggregated and anonymized data from all companies that elect to adopt these best practices.



Img 9. Illustration only

# 03

## What needs to happen in order for this to work

We believe people should be able to access information about how their data is being collected and used for tailored ads in a consistent way, so they don't have to learn multiple systems to set their preferences. And once users make changes to those preferences, their choices should be respected by everyone.

To achieve this vision, we are opening a dialog with the industry and looking to get to broad alignment through an open, standards-setting process on the following key elements:

### **A standard way to surface how data is being collected**

Any domain that collects data from users should have a clear and consistent way of conveying what data is being collected, who is collecting the data, and for what purpose—such as advertising, measurement of advertising effectiveness, website analytics, website customization and improvement of that site's experience.

### **A standard way to label ads with metadata**

Every ad on the web should be accompanied by metadata that offers information about the ad in a clear and consistent way, such as the advertiser that paid for the ad, the companies that were involved in the process of serving the ad, and the criteria that were used to determine who should see the ad.

## **A standard way to surface the companies involved in showing ads**

Users should be able to easily identify the different companies a website works with to sell advertising. They should also be able to easily understand what each of those companies are doing, including who is selling and reselling ads on behalf of the website, who is bidding for and buying ads on the site, what information is shared about the user with bidders and ad buyers, and the ad tech providers supporting those buyers. Some of this information may be available through a website's ads.txt file and a browser's developer tools, but it should be presented in a way that's clear enough for users to be able to understand and choose what happens with their data.

## **A centralized registry of participating companies**

Users should have a way to easily access information about all the companies involved with data collection and digital advertising, including ad platforms, ad tech providers, and data collection domains. Information about each of these entities and what each of them does in the ecosystem can be stored in a registry so that it can be accessed and presented in a way that users can easily understand. The registry can be compatible with one of many frameworks that are already in place or being built for regulatory compliance.

## **Shared understanding of how to address practices that bypass the standards arrived at through industry discussion**

We all share the common goal of wanting to protect users against practices that don't respect user choice, or offer transparency and control. To ensure that users are protected against practices that weaken their privacy, we must also develop an understanding of how to address practices by participating companies that are inconsistent with the standards arrived at through industry discussion.

# 04

## Next steps

### **Gather industry feedback on this proposal**

We invite you to review what we've proposed in this document. We're eager to engage in dialog and receive feedback so that together we can identify best practices for how to make ads relevant and how to protect users against measures that don't respect their privacy. To facilitate this process, we've created [this form](#) to collect feedback.

To aid with this dialog and help explore the feasibility of this proposal, Google will launch an early, experimental, open-source browser extension that will display information for ads shown to a user and will work across different browsers. We plan to start with the ads that Google shows on our own properties and on the properties of our publishing partners. We will also be providing open protocols to enable other advertising companies to use the browser extension in order to disclose similar types of information to their users, if they choose.

### **Continue to learn from users**

The proposal outlined in this document is grounded in what we've learned from our ongoing research to understand user preferences, motivations and concerns with regard to how data is used for advertising. Such research is critical to informing our beliefs and priorities and will continue throughout our discussions with the industry.