

*Whitepaper*

# **TCF v2.2: what we've learned so far**

Insights and observations ahead  
of November 20th

**DIDOMI**





Didomi has been actively involved in developing the TCF 2.2 with the IAB. The latest version of the framework introduces new requirements for increased transparency, something we believe is completely aligned with our Privacy UX beliefs.

We are grateful for the trust of our customers, partners, and collaborators and are excited to share our findings with you going forward about the TCF v2.2 and its impact on our industry.



**Romain Gauthier**

Co-founder and CEO at Didomi

# Summary of the main changes of the TCF v2.2

This year, the Transparency and Consent Framework evolved to its v2.2, and all participants are expected to comply by November 20, 2023.

These are some of the biggest changes in the latest iteration of the framework:

- ✓ Removal of 'legitimate interest' as a legal basis for some Purposes
- ✓ Addition of Purpose 11 to enhance user's content experience
- ✓ More descriptive names and explanations of Purposes and Features to aid user understanding
- ✓ Standardization of additional information about Vendors to improve transparency:
  - Mandatory disclosure about the number of Vendors in the first layer of the CMP
  - Mandatory disclosure of additional Vendor information in the second layer of the CMP
- ✓ Specific requirements to facilitate users' withdrawal of consent

For many, the most notable change is **the requirement to display the number of vendors** on the first layer of the consent banner.

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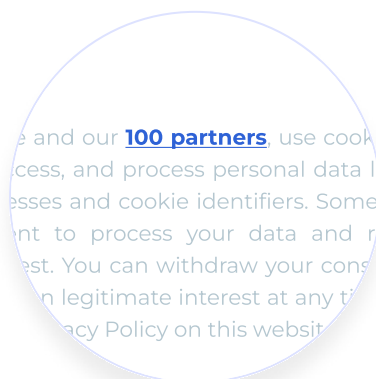
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After November 20th, the TCF integration [will be disabled for any Didomi customer that has not migrated to the TCF V2.2](#). But what have we observed so far within our customer base?

# TCF v2.2 adoption and impact pre-November 20th deadline: Trends and insights from our customers

Based on the unique dataset at our disposal, we've been able to observe the general adoption rate of the TCF v2.2 in our customer base. So far, the observed adoption in terms of consent banners is below 17% as of November 14, 2023, a number that is bound to change soon with the looming deadline.

**But what are some of the changes we observed among participants that did migrate from TCF v2.1 to v2.2?**

## Change in the number of vendors from TCF v2.1 to v2.2

In our sample of customers that have migrated from TCF V2.1 to TCF V2.2 ahead of the deadline, **we do not observe a noticeable impact** on the number of vendors displayed.

The fact that most organizations have not chosen to reduce the number of vendors displayed on the first layer of their Consent Management Platform (CMP) is interesting, given that the slow adoption of the TCF v2.2 so far has been associated with concerns over the impact it might have on the consent rate and monetization:



*Under prior TCF versions, only a small fraction of consumers, typically below 10%, viewed the publisher's vendor list. Those who did generally underestimated the number of vendors listed.*

*With TCF 2.2, 100% of consumers now see the total number of vendors.*

*An unreasonable number of vendors is difficult to justify (consumers cannot make informed decisions), and naturally leads to erosion of trust and reduced monetization (from lower "opt-in" rates), so not curating vendors could be considered self-harm.*



**Simon Bennett** | TCF and Privacy Expert

**Since the number of vendors displayed has not significantly changed for organizations that have adopted the TCF v2.2, what has been the impact on their consent rate performance?**

## Impact of the TCF v2.2 on consent rate so far

We've measured consent rate variation for banners that have migrated from TCF V2.1 to TCF V2.2. The average number of vendors in our sample is 82, a number that has not changed from the previous version of the framework to its latest iteration, as mentioned above.

These are some of the biggest changes in the latest iteration of the framework:

### Banner consent rate variation from TCF V2.1 to TCF V2

Total volume of choices: **300M** | Banners in the sample: **+300**

Average	Median
<b>0.02%</b>	<b>-0.08%</b>

The median consent rate variation after the migration from TCF V2.1 to TCF V2.2 is -0.08%.

*Period of the study: Oct. 1, 2023 to November 17, 2023*

## What does it mean?



*These results are preliminary, since only a minor portion of consent banners have been switched to the TCF V2.2 version so far.*

*However, the first results show that, for now, displaying the number of vendors has no visible impact on the consent rate. It is possible that most users have not realized the modification, given it's mostly integrated into the text of the first layer. A broader adoption of the TCF V2.2 might make this change more obvious and, in turn, have a greater impact.*

*We will continue to monitor and share our findings as TCF V2.2 adoption becomes widespread.*



**Quentin Marques** | Head of Data at Didomi

## Next steps for organizations

**Participants in the TCF are expected to comply with v2.2 requirements by November 20, 2023.**

Over the past year, Google has introduced updated requirements for publishers and developers serving ads to users in the European Economic Area or the UK, requiring them to use a TCF-compliant, [Google-certified Consent Management Platform \(CMP\)](#) from January 16, 2024. 2024 will see more regulatory updates going in the same direction and requiring more transparency, such as the [Digital Markets Act](#) (DMA) and the Digital Services Act (DSA).

While compliance with the Transparency and Consent Framework (TCF) and other legal frameworks remains a primary concern in vendor management, it's crucial to also consider other critical aspects that underscore the importance of reducing the vendor list. This encompasses strategies like **Supply Path Optimization** (SPO) or **Demand Path Optimization** (DPO) from the publishers' perspective and the **environmental impact** of these digital advertising practices.

By reducing the number of intermediaries in the digital ad supply chain, publishers can significantly **minimize the dilution of ad spend**. In a typical digital advertising environment, each intermediary takes a cut of the ad spend, which can diminish the revenue that actually reaches the publisher. However, publishers can reduce these intermediary layers with a more direct, optimized pathway facilitated by SPO/DPO principles. This reduction means a larger portion of the ad spend is retained, leading to increased revenue from the same inventory.

Moreover, **the environmental aspect** of having too many vendors operating on a digital property cannot be overlooked. In the digital ecosystem, every server request – triggered each time a publisher calls upon a vendor – has an environmental cost. The cumulative effect of these server requests, especially when multiplied across numerous vendors and partners, results in significant energy consumption. By consolidating and reducing the number of vendors, publishers can contribute to lessening this environmental impact. Fewer server pings mean reduced energy use, aligning digital advertising practices with a more sustainable, environmentally conscious approach.

## How Didomi can help

The team at Didomi is in an excellent position to assist organizations in facing these challenges. We recently released our updated [Global Privacy UX Solutions](#), including our leading Consent Management Platform (CMP) and Advanced Compliance Monitoring (ACM), the most advanced scanning solution of its kind in the market.

As TCF v2.2 rolls out and more organizations start enrolling in the framework in the coming months, we will continue analyzing the data and reporting on the impact of the latest changes on consent rates and consent banner performance.

Follow us on [LinkedIn](#), [Twitter](#), and [our blog](#) for more information, and get in touch with our team to discuss your challenges with a privacy expert:



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