



From :

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To : Tim Cook, CEO of Apple
 July, the 2nd, 2020

IOS 14 : Marketing professionals urge Apple to adopt standards promoting interoperability and more predictable user privacy

Global marketing professionals including Advertisers, Agencies, App Publishers, AdTech and mobile marketing industry stakeholders broadly welcome Apple’s decision to maintain IDFA use across all App Store products and services – as a reminder, IDFA amounts to cookies, albeit much more controlled as the iOS14 announcement shows, in an app driven environment. Following recent rumours around Apple potentially scrapping the IDFA altogether, with drastic knock-on effects on the sector, we trust Apple’s decision to keep IDFA will reinforce mobile identifiers as a standard of reference for online identity that is respectful of personal data and user privacy. We also welcome the customer-centricity of the new transparency and control features released by Apple.

However, we have some strong reservations and concerns about the new, proprietary IDFA opt-in pop-up requested by Apple for all apps:

- First, it seems the IDFA opt-in pop-up presented by Apple at its conference does not comply with GDPR information requirements regarding the collection of consent for personalized ads. Part of the information requested by Apple can also be found in Consent Management Platforms (CMPs) that are already widely used in the application world in this region. It is therefore redundant at best in the EU context and will bear strong and negative consequences on the overall mobile user experience with repetitive, yet non-interoperable presentations to users and collection of the same consent.
- Second, the proposed pop-up appears to be not widely customisable by the app developer and is not interoperable with digital advertising market standards, such as the IAB Europe’s Transparency & Consent Framework (TCF), which among other values standardises data uses and vendors presented to users. The “AppTrackingTransparency” feature has no concept of standard data uses or vendor

presentation. As a consequence, the new Apple pop-up cannot be used by digital advertising sector to comply with GDPR requirements applicable to online advertising.

- Third, the pre-defined and non-customisable design settings of the pop-up to be displayed carry a high risk of user refusal depending on the UX and moment it is presented. There is no option for the publisher to request consent in the future, even if the user grants their consent via their own CMP at a later stage. Additionally, publishers don't have the opportunity to highlight or explain the value of this request, namely the monetisation of content that can be provided at no cost to users. These settings could have a strong negative impact on advertising revenues of iOS app publishers as well as on mobile marketing stakeholders.
- Fourth, Apple's initiative raises competition issues, especially for industry stakeholders specialised in mobile app promotion and measurement. The ability for these companies to conduct businesses and provide their services could be severely restricted, while Apple's services would not be in scope of this new pop-up concerning the personal data for their own advertising purpose. As a result, Apple advertising services such as Apple Search Ads on the App Store will strengthen their competitive advantage. As a reminder, the App Store is the only App Store available via iOS, a key app environment which amounts to 90% of the time spent by mobile users.

We therefore urge Apple to:

- Offer reassurances regarding the neutrality of its own terminals, OS and App Store;
- Adapt their business decisions to ensure compliance with sovereign frameworks like GDPR and consensus-derived privacy standards like IAB Europe's TCF;
- Ensure their IDFA opt-in pop-up can be customized and interoperable with existing digital advertising market standards. If not achievable, the new IDFA pop-up requirement should be scrapped in EU countries;
- Respect ownership of publisher audiences without hampering on the direct relationship publishers have built with their users;
- Undertake an in-depth impact assessment on the industry (including the impact on publisher revenue, jobs and growth alike) prior to implementing any update to iOS 14;
- Work in consultation and collaboration with the media industry on an ongoing basis to define, develop, deploy, and evolve standards that support privacy-centric addressability, including an initial meeting with industry stakeholders in July 2020.

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