

A close-up photograph of a person's hands holding a smartphone, capturing a photo of a woman in the background. The scene is outdoors, likely at a social gathering, with other people and trees visible in the blurred background. The lighting is bright, suggesting daytime.

“DO NOT TRACK”: STATUS AND THE POSITION OF DEUTSCHE TELEKOM

Frank Wagner, Vice President Goup Privacy, Deutsche Telekom



LIFE IS FOR SHARING.

BRIEF HISTORY

W3C WORKSHOP ON PRIVACY AND DATA USAGE CONTROL - 04/05 OCTOBER 2010, CAMBRIDGE (MA), USA

PROTECTING CONSUMER PRIVACY IN AN ERA OF RAPID CHANGE PRELIMINARY FTC STAFF REPORT - DECEMBER 2010

W3C WORKSHOP ON WEB TRACKING AND USER PRIVACY - 28/29 APRIL 2011, PRINCETON (NJ), USA

INITIAL FACE TO FACE MEETING OF THE W3C TRACKING PROTECTION WORKING GROUP - 21/22 SEPTEMBER 2011, CAMBRIDGE (MA), USA





W3C TRACKING PROTECTION WORKING GROUP

66 group participants,

6 Invited Experts,

8 Working Group face to face meetings (2011 – 2013),

1 Global Considerations Task Force face to face meeting

Lots of regular teleconferences,

Tons of emails on the mailing list

Three direction approach:

- Tracking Preference Expression (technical spec)
- Tracking Compliance and Scope (compliance spec)
- Tracking Selection Lists

<https://www.w3.org/2011/tracking-protection/>



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ACTUAL RESULTS OF THE W3C STANDARDIZATION: TECHNICAL SPECIFICATION

Tracking Preference Expression (DNT)

W3C Candidate Recommendation 20 August 2015

<https://www.w3.org/2011/tracking-protection/drafts/tracking-dnt.html>

This specification defines the DNT request header field as an HTTP mechanism for expressing the user's preference regarding tracking, an HTML DOM property to make that expression readable by scripts, and APIs that allow scripts to register site-specific exceptions granted by the user. It also defines mechanisms for sites to communicate whether and how they honor a received preference through use of the Tk response header field and well-known resources that provide a machine-readable tracking status.

DNT	meaning
1	This user prefers not to be tracked on the target site.
0	This user prefers to allow tracking on the target site.



ACTUAL RESULTS OF THE W3C STANDARDIZATION: COMPLIANCE SPECIFICATION

Tracking Compliance and Scope

W3C Candidate Recommendation 26 April 2016

<https://www.w3.org/2011/tracking-protection/drafts/tracking-compliance.html>

This specification defines a set of practices for compliance with a user's Do Not Track (DNT) tracking preference to which a server may claim adherence.

This editor's draft does not constitute consensus and may change.

ACTUAL RESULTS OF THE W3C STANDARDIZATION: TRACKING SELECTION LISTS

Tracking Selection Lists

Early first draft – no WG consensus

<https://dvcs.w3.org/hg/tracking-protection/raw-file/tip/ED-tracking-tsl.html>

The Tracking Selection Lists specification defines a format for interchangeable lists for blocking or allowing Web tracking elements and expected user-agent interpretation of this format.

A selection list contains parts of third-party URIs that a browser may access automatically when referenced within a Web page that a user deliberately visits. Rules in a selection list may change the way the user agent handles third-party content. By limiting the calls to these Web sites and blocking resources from other Web pages, the selection list limits the information other sites can collect about a user.

There is no consensus in the working group to this draft !

ACTUAL STATUS OF THE TRACKING PROTECTION WORKING GROUP: TYPE OF DOCUMENT

Two parts of the standard

- Tracking Preference Expression (DNT)
- Tracking Compliance and Scope

are candidate recommendations. This means just one step before becoming a recommendation.

At this level usually the experience from first implementations is used to make last adjustments to the standard.

Third part of the standard

- Tracking Selection Lists

found no consensus in the working group. There is a rough draft published.

ACTUAL STATUS OF THE TRACKING PROTECTION WORKING GROUP: IMPLEMENTATION

Tracking Preference Expression (DNT)

Details on Product TPE Implementation Report

Open, Raised and Pending Review Issues

New issues for this product are notified to public-tracking@w3.org ([change it](#)).

There are 0 open and raised issues listed in the system.

Open Actions

There is 1 open and pending review action.

ID	State	Title	Person	Due Date	Associated with
ACTION-470	open	Design and post on the wiki a draft interoperability test matrix	Mike O'Neill	2015-10-07	TPE Implementation Report

[Add a new action item.](#)

See [all issues and actions for this product.](#)

Tracking Protection Working Group Issue Tracking

Summary

Issues:

- [Raised](#)
- [Open](#)
- [Pending Review](#)
- [Closed](#)
- [Postponed](#)
- [All](#)
- [Create](#)

Actions:

- [Open](#)
- [Overdue](#)
- [Closed](#)
- [Pending Review](#)
- [Raise](#)

[Users](#)

- [My Tracker](#)

[Products](#)

[Agenda planning](#)

[Recent activity](#)

[Edit this product](#)

Matthias Schunter <matthias.schunter@intel.com>, Carl Cargill <cargill@adobe.com>, Chairs, Wendy Seltzer <wseltzer@w3.org>, Staff Contact
Tracker: [documentation](#), ([configuration for this group](#)), originally developed by [Dean Jackson](#), is developed and maintained by the Systems Team <w3t-sys@w3.org>.
\$Id: index.php,v 1.325 2014-09-10 21:42:02 ted Exp \$

Tracking Compliance and Scope

Privacy/TPWG/TCS Implementation Report

< [Privacy](#) | [TPWG](#)

This page is to collect implementation experience for the Candidate Recommendation of the Tracking Compliance and Scope specification.

Please add implementation experience below.

This page was last modified on 6 March 2016, at 21:25.

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TRACKING PREFERENCE EXPRESSION IN A NUTSHELL: USER PREFERENCE EXPRESSION

1. User Agent -> Site: Do Not Track Header:

DNT: 1 = This user prefers not to be tracked

DNT: 0 = This user prefers to allow tracking

2. Site -> User Agent: Tracking Status Object:

1. Tracking Property

"N" – not tracking

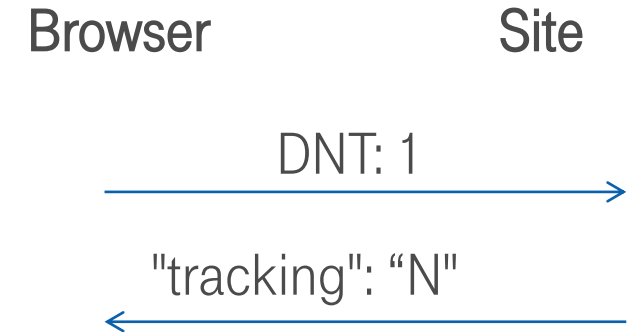
"T" – tracking

"C" – tracking with (confirmed) consent

...

2. Compliance – URLs of specific regimes to which the origin server claims to comply (e.g. W3C TCS)

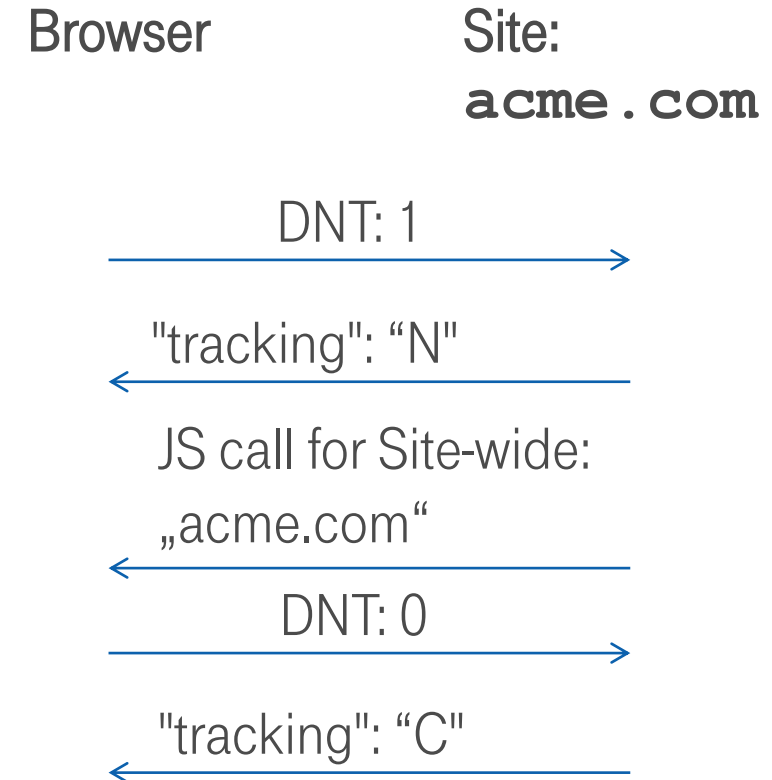
3. Additional Information: Qualifiers, Same-Party, Controller,



TRACKING PROTECTION EXPRESSION IN A NUTSHELL: USER-GRANTED EXCEPTIONS

Interactive Negotiation „Protocol“:

1. User browses with DNT: 1
2. Site would like to obtain consent to track
 1. Site-wide: For third parties embedded in a given first party
 2. Web-wide: For a given organisation embedded in any origin site
3. Exception is stored in browser
4. Consent (DNT: 0) will then be sent to all corresponding sites



IMPLEMENTATION STATUS GUESSTIMATES

Browsers / User Agents:

- Sending DNT Signals to Sites: Most
- Processing Tracking Status from Sites: Few
- User-granted Exceptions: Edge+Plugins

Web Sites:

- Processing DNT Signals: Some (statistics: some)
- Publishing Tracking Status Objects: Few
- Implementing Compliance Spec TCS: None



LATEST DISCUSSIONS ABOUT THE FUTURE OF DO NOT TRACK



During the W3C Technical Plenary / Advisory Committee Meetings Week Lisbon, Portugal, 19-23 September 2016 there have been some informal meetings about the future of do not track.

Based on the low (no) feedback of implementation there have been the intention to terminate the working group.

Based on the input of a representative of the French Data Protection Authority (CNIL) and some discussions of working group members it was recommended to evaluate the implications from the GDPR and from the upcoming ePrivacy Directive.

The actual charter was extended until the end of 2016. Re-chartering or setting up a new charter is possible.

Frank Wagner: "Do not track": status and the position of Deutsche Telekom

CONCLUSION



Photo: Daniel R. Blume <https://www.flickr.com/photos/dr62/>

Two elements are in place:

1. a switch to express user's preferences.
2. a mechanism to communicate with the user.

What if those elements are used as a consent mechanism instead of a general opt-out tool ?



SETTINGS ON THE WEB VS. SETTINGS IN THE BROWSER

opt-out scenario (settings on the web)

1. go to the website
2. **discover the location of the privacy policy**
3. read the policy
4. understand the policy
5. **identify the issues you want to opt-out (multiple choices affect multiple actions !)**
6. don't be afraid in being linked to a „foreign“ website
7. **discover the location of the opt-out button at the „foreign“ website**
8. **click opt-out ! Congratulations !**
9. repeat steps 5 - 8 for each specific issue
10. repeat all previous steps if your cookies are deleted

do not track scenario (settings in the browser)

1. open your user agent (first time)
 2. do your choice
- or
1. open your user agent
 2. discover the dnt setting
 3. do your choice

NEXT STEPS: PERSPECTIVE OF DEUTSCHE TELEKOM, GROUP PRIVACY

Model implementation of Tracking Preference Expression:

- User agent
- Server side

Evaluate the implementation:

- legal requirements (GDPR, ePrivacy Directive, etc)
- business requirements, efforts
- involve data protection authorities



THANK YOU.

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