

Draft Framework for DNT Discussions Leading Up to Face-to-Face

1. DNT would be honored by third parties that collect tracking data, and these third parties would not collect tracking data on any browser where the consumer has activated the DNT functionality. Third parties could still collect data for the narrow set of permitted uses. For DNT:1 users, if an entity has a permitted basis for collection of such information, the entity can use the data only for the permitted uses.
2. Non-compliance with DNT would be a DAA violation.
3. The DAA would modify its current codes, notably including the current “market research” and “product development” exceptions to collection limits, including evaluation of potential retention limitation.
4. For DNT:1 users, there would be no persistent IDs if there is not a permitted use. The use of persistent IDs for permitted uses would be limited to the extent practical, and any such persistent IDs would be used only for any such permitted use. There would be of a broader study or effort to address data hygiene in the advertising eco-system, with the aim of identifying feasible, privacy-protective practices over time.
5. We would determine a way to have the DAA codes become a way for compliance with the W3C syntax. Thus, the DAA standard with the above modifications would be the working standard for companies. Adapt the W3C standard to conform to this approach. DAA would support and enforce against that.
6. DNT would be off by default. Specific standard on how to implement:
 - a. Through browsers—this is about browsers and not other user agents. Other user agents (UA) would not set a DNT flag in this round of the W3C work, and would be prohibited from activating a browser’s DNT flag.
 - b. The browser choice setting would be available in the browser settings panel, accessible from the traditional browser settings—not through an installation process or other similar mechanism.
 - c. Develop technological measures that, together with non-technological measures, greatly reduce the risk that anyone other than consumers are setting the choice. Develop a process on how to achieve this in a short time frame (3 months).
 - d. Brief and neutral description of the impact of turning the setting on. The browser choice setting would communicate the following to consumers:
 - i. The fact that if the browser choice setting is activated it limits collection and use of web viewing data for certain advertising and other purposes;
 - ii. The fact that when the browser setting is activated some data may still be collected and used for certain purposes and a description of such purposes; and

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- iii. The fact that if a consumer affirmatively allows a particular business to collect and use information about web viewing activities that the activating the setting will not limit collection and use from such entity.