

Advanced Advertising Transparency Programme

# ACTIVATION GUIDE

**EDAA Guidance for Online Platforms  
and (Non-Platform) Advertising Services**



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## Introduction

The EU's Digital Services Act (DSA) imposes new transparency obligations on online platforms that provide digital advertising to online consumers located in the European Union.

The European Interactive Digital Advertising Alliance (EDAA) has been tracking these regulatory developments closely from the initial proposal stage to the current legislation. Our objective is to support companies participating in EDAA Programmes and the wider digital advertising ecosystem in aligning to these new obligations.

Through its unique market posture, footprint, and programme structure, EDAA facilitates a harmonised industry response while ensuring an optimal and simplified process for all participant companies. This is particularly relevant in the context of the DSA, where facilitation between industry players will be essential for meeting the new transparency demands, while isolated compliance efforts will only lead to fragmentation, contrary to the purposes of the legislation itself. In addition, the European Commission encourages the development and implementation of **voluntary standards** and **voluntary codes of conduct**, as well as the involvement of a **wide range of stakeholders** in the effective application thereof.

EDAA introduces the following initiative to further align the participating companies with the EU Digital Services Act (DSA), respecting the requirements set out by Art. 26 (Advertising on online platforms) and Rec. 68 of that Act.

**The EDAA Advanced Advertising Transparency Programme (AATP)** builds upon EDAA's foundational principles (transparency, choice, control, consumer education) that have informed EDAA's work to this stage. These remain valid and in effect for participating companies.

The AATP provides further transparency that is specifically aligned to the DSA. This will more effectively serve EDAA participant companies in this emerging legislative environment.

The primary purpose of this "Activation Guide" –and the AATP initiative it describes– is to **drive industry-wide alignment** so that implementations dovetail correctly at scale while remaining compatible and harmonised with existing compliance and self-regulatory frameworks, as well as with existing technical standards.

## Disclaimer

**The EDAA’s Advanced Advertising Transparency Programme** –and this “Activation Guide”–, neither constitutes, guarantees, nor certifies formal legal compliance with the DSA nor does it express legal compliance advice with regard to the DSA or any other relevant EU legislation or regulation, present or forthcoming. However, depending on individual practices, compliance with the EDAA Principles Framework may be part of an ecosystem of solutions that companies that are in the scope of the DSA apply in this regard.

Conversely, direct compliance with (or, where appropriate, support of) the EDAA’s Principles Framework is deemed essential -as noted above- to any company involved in digital advertising in Europe. Specifically, the Principles and accompanying guidance cater to all countries that are members of the Council of Europe, including European Union and European Economic Area markets, as well as the UK, Switzerland and Türkiye.

The purpose of the EDAA’s Advanced Advertising Transparency Programme, and this Activation Guide, is to provide industry players with a useful set of tools to add to their transparency solutions portfolio, for the benefit of the digital advertising industry and European consumers, and for greater transparency towards regulators as to industry actions and uptake in relation to this best practice. In this regard also, EDAA does not offer legal guidance, nor does it specify who are the players that would fall under the incidence of various laws.

# Guidance for Online Platforms

## What is an Online Platform?

### 1. Under the Digital Services Act

Under the DSA, an “**online platform**” is defined as “*a hosting service<sup>1</sup> that, at the request of a recipient of the service, stores and disseminates information to the public*” (Art. 3).

- The DSA offers **two concrete examples** of “online platforms”: “social networks” and “online platforms allowing consumers to conclude distance contracts with traders” (Rec. 13).
- The DSA also mentions **one explicit exemption** from the category of “online platform”: hosting services whose dissemination activities are only a minor and purely ancillary feature of another service, or a minor functionality of the principal service, and cannot be used without the service it is linked to (Rec. 13 provides these examples: the comments section of an online newspaper, where it is clear that it is an ancillary service to the main one – the publication of news; cloud computing and web-hosting services when serving as infrastructure, for example of an internet-based application, website or online platform).

### 2. Under the EDAA Advanced Advertising Transparency Programme

The EDAA Advanced Advertising Transparency Programme (AATP) will **align with the above definition** of “online platform” as pertains to the additional transparency requirements introduced by Art. 26 (Advertising on online platforms).

Art. 26 concerns “*online platforms that present advertisements on their online interfaces*”. Within the context of the AATP, this includes:

- Online platforms that display **ads trafficked by themselves** (e.g. platform direct sales, native/in-stream advertising, as well as other proprietary advertising sales channels and formats).
- Online platforms displaying **ads trafficked by a third party**, which may or may not qualify as an “online platform” (e.g. ads received from the ad tech ecosystem where the campaign is created elsewhere, for example with a DSP or Ad Server or another entity playing a similar role).

For all intents and purposes, the EDAA’s AATP does not equate “online platforms” (as defined under the DSA) with media publishers (as commonly understood in the ad tech industry), or indeed with regular website owners – who do not qualify as online platforms under the DSA.

Where a media publisher may own or operate one or several properties across their portfolio that qualify as a “platform” under the above definition, the Principles of the AATP apply to those properties without the media publishers themselves being subject to the Principles beyond such

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<sup>1</sup> A “hosting service” is one of the three types of intermediary services subject to DSA requirements. It is an intermediary service characterised by “the storage of information provided by, and at the request of, a recipient of the service” (Art. 3).

circumstances (i.e. for applicable advertising inventory, which may not be the publishers' entire inventory catalogue).

## What are the transparency obligations of Online Platforms under the DSA?

### 1. Art. 26 (Advertising on online platforms)

- a. Under DSA Art. 26, online platforms that present advertisements on their online interfaces are expected to **disclose the following information** about each ad presented to each individual recipient:
- That the information presented is an ad (including through prominent markings)
  - The natural or legal person on whose behalf the ad is presented
  - The natural or legal person who paid for the ad to be presented (if different from the above)
  - Meaningful information (directly and easily accessible from the ad) about the main parameters used to determine the recipient and, where applicable, how to change them

The transparency disclosure must meet the following **criteria**:

- Clarity
  - Conciseness
  - Unambiguity
  - Real time
- b. Online platforms are expected to provide service recipients with a functionality to declare whether the content they provide is or contains **commercial communications**, and must ensure that the commercial nature of the content is conveyed to other service recipients in real time and in a clear, unambiguous manner.
- c. Online platforms may not present ads to specific service recipients based on profiling using **special categories of personal data** (as defined under GDPR).

### 2. Other relevant DSA provisions

- a. Although not compulsory, under the DSA the European Commission encourages the development and implementation of **voluntary standards** in relation to, among other matters:
- i. Interoperability of ad repositories (applicable to VLOPs/VLOSEs);
  - ii. Transmission of data between intermediaries in support of online platforms' online transparency obligations;
  - iii. Technical measures to enable compliance with DSA requirements, including on prominent markings for ads and commercial communications<sup>2</sup>.
- b. The European Commission also encourages the drawing up of **voluntary codes of conduct** at Union level to contribute to further transparency for all actors in the value chain beyond the basic requirements of Art. 26 and Art. 39. The codes of conduct are expected to be developed by 18 February 2025 and to address at least the following matters:
- i. The transmission of transparency information to service recipients (under Art. 26);

<sup>2</sup> Digital Services Act, Art. 44 (Standards)

- ii. The transmission of information to ad repositories (under Art. 39);
- iii. Meaningful information on data monetisation<sup>3</sup>.

## What are the obligations of Online Platforms under the EDAA Advanced Advertising Transparency Programme in relation to DSA?

- a. To ensure the delivery of complete and correct enhanced transparency disclosures for every ad (either directly or by working with relevant ad tech partners), prioritising high levels of consistency in consumers' online experience;
- b. To respect the Principles of Application of the EDAA Programme to the DSA ("[Principles document](#)");
- c. To demonstrate compliance with the EDAA AATP and its guiding Principles through an independently verified certification process; and,
- d. To acknowledge, respect, and adhere to the applicable SRO (national advertising Self-Regulatory Organisation under the umbrella of EASA - the European Advertising Standards Alliance) complaint handling and investigatory processes.

## Activation for Online Platforms

The following will outline the steps you must take to integrate the EDAA Advanced Advertising Transparency Programme into your platform operations and certify to the AATP if you meet the Online Platform definition as articulated above (under the DSA and/or EDAA definitions).

### Integration

In order to successfully integrate the AATP into your operations:

- a. Ensure that the **Ad Marker** is applied to all ads (whether created by and displayed on your own platform, or created by a third party and displayed on your platform). To do so, you may choose between the following potential routes:
  - i. Deliver the Ad Marker directly
  - ii. Use a specialised Enhanced Notice Provider and/or
  - iii. Ensure your Ad Tech partners apply the Ad Marker.

The Ad Marker is a combination of **three elements**: (1) the AdChoices Icon; (2) the ad disclaimer wording (when displayed); and, (3) a container to isolate the Icon (and text) from the surrounding creative when being presented within an ad.

The Ad Marker may be placed **on (overlay) or around the ad**. When ad-related consumer-facing transparency notices are applied around the ad directly by the Online Platform, it should be recognised - and EDAA's approach ensures - that a **high degree of flexibility** is necessary to

<sup>3</sup> Digital Services Act, Art. 46 (Codes of conduct for online advertising)

allow website operators to provide meaningful transparency, choice and control, while continuing to innovate and serve consumers.

*Further details on the Ad Marker (including a broader definition) can be found in the [EDAA Advertising Icon Technical Guidance document](#).*

- b. Ensure that the **transparency information** required under DSA Art. 26 is:
  - i. collected at the time of campaign creation (for direct sales);
  - ii. correctly interpreted when conveyed by partners in the AdTech supply chain; and,
  - iii. correctly displayed in the Enhanced Transparency Page by:
    - 1. Rendering the Enhanced Transparency Page (and DSA transparency information therein) directly, or
    - 2. Ensuring that the Enhanced Transparency Page (and DSA transparency info therein) is rendered by the buy-side AdTech partners or by an Enhanced Notice Provider.

### Independent Certification

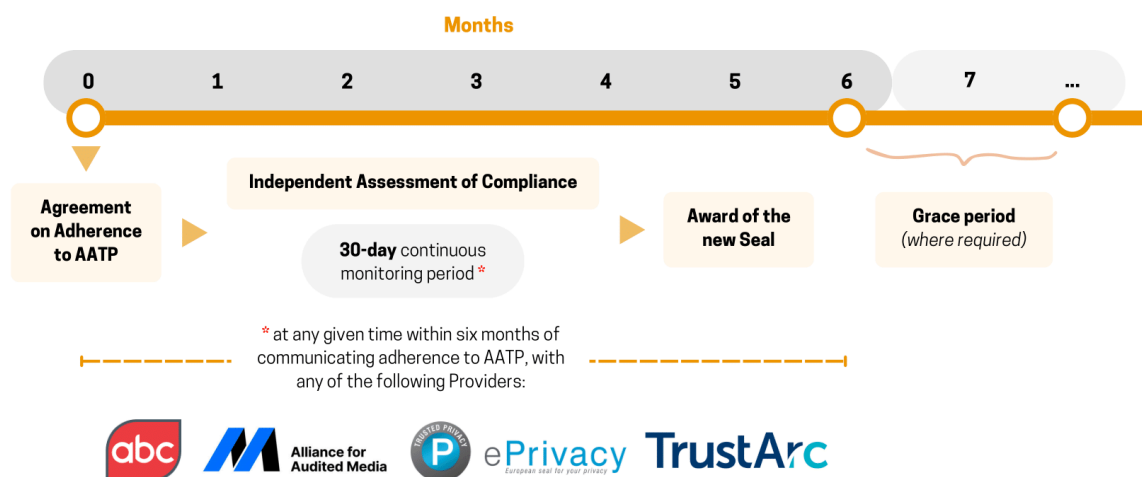
Your AATP compliance will be certified through a **three-step process** further supported by **independent Certification Providers that are EDAA-authorized for this purpose**:

- a. **Agreement on adherence to AATP**: you must formally communicate your adherence to AATP to the EDAA (this may include for instance licensing agreements or addenda thereof) and adjust your advertising transparency practices according to Programme requirements.

*N.B. It may be noted that this is a simplification of the previous EDAA Self-Certification Criteria and Reporting Requirement, to ensure a more straightforward approach for participants whilst maintaining the rigour of the Programme.*

- b. **Independent assessment of compliance**: within six months of confirming your adherence to the AATP you must engage an independent EDAA Programme Certification Provider who will assess your compliance to the Programme over a 30-day observation period; a grace period extending beyond the six-month deadline is granted to address issues of non-compliance (where required).
- c. **Award of the EDAA Trust Seal**: following this 30-day period and upon successful completion of the Independent compliance assessment, the EDAA Programme Certification Provider will award you an authorised “EDAA Trust Seal”.





## Accountability

Accountability is designed along four dimensions:

1. **Consumer queries handling** by [Advertising Self-Regulatory Organisations \(SROs\)](#), that enables European consumers to submit questions about the ads they see online and the functioning of the digital advertising ecosystem as a whole. SROs answer consumers in their own language, offering direct responses or links to additional educational material.
2. **Consumer complaints handling** by [Advertising Self-Regulatory Organisations \(SROs\)](#), that enables European consumers to report programme non-compliance issues. Where applicable, companies commit to addressing in a timely and substantive manner to the requests of SROs.
3. **B2B recourse mechanism**

If the ad tech partners of the Online Platform (as this entity is defined under DSA and/or AATP) **do not** adequately provide transparency information via the AATP mechanisms, a resolution can be facilitated through an issue resolution centre enabled by EDAA, with the desired outcome to restore technical compliance of the respective ad tech partners. The role of the issue resolution centre will be akin to EDAA’s current role in monitoring and restoring functionality of companies within the programme when technical breakdowns occur.

4. **European Monitoring Exercises** conducted by SROs on an ad-hoc basis, at the request of EDAA, to verify compliance with specific AATP Principles.

## Timeline

Soft launch ( <i>done</i> )	14 November 2023
Formal launch for implementation	February 2024
Certification grace period (launch date + 6 months)	August 2024

## Notes and FAQs

### 1. Does my company qualify as an “online platform” under the AATP?

The AATP adopts the same definition of “Online Platform” as stipulated by the Digital Services Act, and offers companies a tool to facilitate alignment with DSA Art. 26 requirements.

Owing to the lack of regulatory guidance and case law on the Digital Services Act, EDAA encourages companies to seek autonomous legal guidance in the determination of their “online platform” status.

### 2. Is accountability and enforcement a necessary part of the Programme?

Accountability and enforcement are highly desirable elements for any industry-wide regulatory initiative for several reasons:

- Accountability and enforcement set out a clear path for companies deviating from the guiding Principles to regain compliance with the Programme, through a stepped approach that is foreseen to solve a majority of compliance issues.
- Accountability and enforcement ensure that all companies involved in the Programme act in a harmonised and predictable manner, particularly when it comes to requirements that involve a chain of actions by different actors (e.g. transmission of transparency information from advertisers to online platforms to consumers).
- Accountability and enforcement protect the credibility of the Programme and guarantee high standards of conduct to external ad tech companies, consumers, as well as regulators.
- Their existence combined with the essential role of independent certification offer reassurance of trustworthiness towards industry, regulators, and consumers alike.

### 3. Who is subject to Programme accountability and enforcement?

All companies participating in the Programme are subject to the accountability procedures, regardless of their obligations (or lack thereof) under the DSA.

# Guidance for Non-Platform Advertising Services

## How do we define Non-Platform Advertising Services?

### 1. Under the Digital Services Act

The DSA does not make reference to or offer a definition for what we describe as “Non-Platform Advertising Services”. This denomination was specifically created for the purpose of the EDAA Advanced Advertising Transparency Programme in order to ensure a clear distribution of roles and responsibilities among participating companies.

### 2. Under the EDAA Advanced Advertising Transparency Programme

“Non-Platform Advertising Services” is defined as every company involved in the **transmission of DSA-related transparency information** from campaign creation to ad delivery.

This group of companies plays an essential role in enabling Online Platforms to provide the transparency disclosures required under DSA Art. 26. It may include the following:

- Advertisers
- Media and creative agencies
- DSPs and Ad Servers
- Ad Networks
- SSPs
- Ad Exchanges

## What are the transparency obligations of Non-Platform Advertising Services under the DSA?

### 1. Art. 26 (Advertising on online platforms)

DSA Art. 26 does not impose any specific transparency obligation on Non-Platform Advertising Services.

That being said, by placing obligations on “online platforms”, by leaving room for industry standards and codes of conduct, and by specifically calling for cross-industry mechanisms to facilitate the exchange of information between relevant players<sup>4</sup>, the DSA sets a **clear expectation for compliance to be facilitated by the ecosystem as a whole**.

### 2. Other relevant DSA provisions

- a. The DSA recognises that “the provision of online advertising generally involves **several actors**, including intermediary services that connect publishers of advertisements with

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<sup>4</sup> Digital Services Act, Art. 44 (Standards), Art. 46 (Codes of conduct for online advertising)

- advertisers<sup>5</sup>”, and therefore alignment with the new transparency requirements should be facilitated by the contribution of all relevant intermediaries.
- b. Although not compulsory, under the DSA the European Commission encourages the development and implementation of **voluntary standards** in relation to, among other matters:
    - I. Interoperability of ad repositories (applicable to VLOPs/VLOSEs);
    - II. Transmission of data between intermediaries in support of online platforms’ online transparency obligations;
    - III. Technical measures to enable compliance with DSA requirements, including on prominent markings for ads and commercial communications<sup>6</sup>.
  - c. The European Commission also encourages the drawing up of **voluntary codes of conduct** at Union level to contribute to further transparency for all actors in the value chain beyond the basic requirements of Art. 26 and Art. 39. The codes of conduct are expected to be developed by 18 February 2025 and to address at least the following matters:
    - I. The transmission of transparency information to service recipients (under Art. 26);
    - II. The transmission of information to ad repositories (under Art. 39);
    - III. Meaningful information on data monetisation<sup>7</sup>.
  - d. The DSA remarks that “the **involvement of a wide range of stakeholders** should ensure that those codes of conduct are widely supported, technically sound, effective and offer the highest levels of user-friendliness to ensure that the transparency obligations achieve their objectives<sup>8</sup>”.

## What are the transparency obligations of Non-Platform Advertising Services under the EDAA Advanced Advertising Transparency Programme in relation to DSA?

- a. To facilitate the delivery of complete and correct enhanced transparency disclosures for every ad (either directly or by working with relevant ad tech partners), prioritising high levels of consistency in consumers’ online experience;
- b. To respect the Principles of Application of the EDAA Programme to the DSA (“[Principles document](#)”);
- c. To demonstrate compliance with the EDAA AATP and its guiding Principles through an independently verified certification process; and,
- d. To acknowledge, respect, and adhere to the applicable SRO (national advertising Self-Regulatory Organisation under the umbrella of EASA - the European Advertising Standards Alliance) complaint handling and investigatory processes.

<sup>5</sup> Digital Services Act, Rec. 107

<sup>6</sup> Digital Services Act, Art. 44 (Standards)

<sup>7</sup> Digital Services Act, Art. 46 (Codes of conduct for online advertising)

<sup>8</sup> Digital Services Act, Rec. 107

## Activation for Non-Platform Advertising Services

The following will outline the steps you must take to integrate the EDAA Advanced Advertising Transparency Programme into your operations and certify to the EDAA if you meet the Non-Platform Advertising Services definition as articulated above.

### Integration

In order to successfully integrate the Programme into your operations:

#### 1. Advertisers

- a. When you create a campaign directly (either with an advertiser-owned Ad Server, or a DSP), acknowledge that some of the **information you provide** will be **carried forward through the transparency mechanism to consumers** (see DSA Art. 26) and collaborate with your technology partners to ensure the accuracy of such information from creation to delivery.

**Note:** you are not required to disclose additional information compared to what you would normally disclose when creating a campaign (e.g. name of your brand, identity of the entity who paid for the ad). You are simply required to acknowledge that some of that information will be converted into user-friendly (i.e., non-technical) language and displayed to the end user.

- b. If serving the ad directly through your Ad Server: Ensure you serve the overlaid Ad Marker with the creative as part of standard practice, by following the guidance applicable to DSPs and Ad Servers below.
- c. Actively seek to work with a) service providers that support the Transparency mechanism and the EDAA Advanced Advertising Transparency Programme, or b) a specialised Provider that allows you to manage the transparency information directly.

#### 2. Media and creative agencies

- a. Media agencies: when you create a campaign on behalf of your client, ensure you fulfil the same active role as described above under Advertisers.
- b. Creative agencies: in addition to the above, account for the fact that at the end of the delivery chain players will display the Ad Marker in or around your creative. Make sure that your messages and/or graphical elements are not obstructed by the Ad Marker placement (see [EDAA Advertising Icon Technical Guidance](#) document).

#### 3. Demand-Side Platforms (DSPs) and Ad Servers

DSPs and Ad Servers are essential in ensuring the ecosystem's alignment with the provisions of DSA Art. 26, as they allow the creation of campaigns either directly by advertisers or by media agencies on behalf of advertisers. DSPs and Ad Servers therefore have information about the advertiser, the entity that paid for the advertising campaign, and the description of the audience as requested by the campaign creator. As such, while not under the direct incidence of the DSA, their support of Online Platforms' transparency efforts is crucial.

For these reasons, EDAA's AATP places a special emphasis on the role of DSPs and Ad Servers. If you fall under these categories, in order to integrate the Programme into your operations:

- a. Ensure that the industry-agreed mechanism to transmit campaign-related transparency information in a machine readable format is implemented and functional. DSPs and Ad Servers allow campaign creation and are ideally positioned to convey such information to partner Platforms.
- b. Where a campaign is trafficked with you as a DSP, ensure that the information required is collected at campaign creation time and that it is displayed in the Enhanced Transparency Page, sent via OpenRTB response or both, depending on the instructions received from the Online Platforms.
- c. If not already present in the creative, **add the overlaid Ad Marker**.

The Ad Marker is a combination of **three elements**: (1) the AdChoices Icon; (2) the ad disclaimer wording (when displayed); and, (3) a container to isolate the Icon (and text) from the surrounding creative when being presented within an ad.

You may integrate the AdMarker yourself or you may elect to work with a partner that can do so on your behalf - an **Enhanced Notice Provider** - who will also ensure that the Ad Marker correctly links to an Enhanced Transparency Page containing all disclosures mandated by DSA Art. 26.

*Further details on the Ad Marker (including a broader definition) can be found in the [EDAA Technical Guidance Document](#).*

- d. When instructed by the Online Platform via the relevant OpenRTB or similar mechanism, render the transparency information on the [Enhanced Transparency Page](#) either directly or by working with a partner that can do so on your behalf - an **Enhanced Notice Provider**.
- 4. Ad Networks and other categories of players that may allow campaign creation**

Ad Networks and other players that allow campaign creation - either directly via their own tools or by using service providers such as Ad Servers - should follow the guidelines for DSPs and Ad Servers noted above. These players may choose to implement the Ad Marker via an **Enhanced Notice Provider**, who will also ensure that the Ad Marker correctly links to an Enhanced Transparency Page containing all disclosures mandated by DSA Art. 26.

## **5. Sell-Side Platforms (SSPs)**

SSPs do not normally allow direct creation of advertising campaigns; however, should they find themselves in a hybrid role where they either allow the creation of campaigns or host ad creatives directly, they should be following the rules applicable to DSPs / Ad Servers.

If you are an SSP that does not allow creation of campaigns nor hosts ad creatives directly, you have no obligations under AATP other than ensuring that any transparency information

originating from other ad tech players is correctly conveyed to your Platform client.

## 6. Ad Exchanges

Ad Exchanges do not normally allow direct creation of advertising campaigns and therefore have no direct obligations under the DSA. However, given their central role in OpenRTB transactions, they are best placed to enable the exchange of transparency information between the buy-side actors such as DSPs and Ad Servers and Platforms that receive ads.

If you are an Ad Exchange and wish to integrate the AATP in your operations, you can support the ecosystem's transparency efforts via:

- a. Contractual obligations with DSPs and Ad Servers that have a seat in the exchange,
- b. Adding specific questions in your RFPs, and
- c. Ensuring that where there is a need, you allow the transmission of transparency data between DSPs / Ad Servers and platforms at the receiving end.

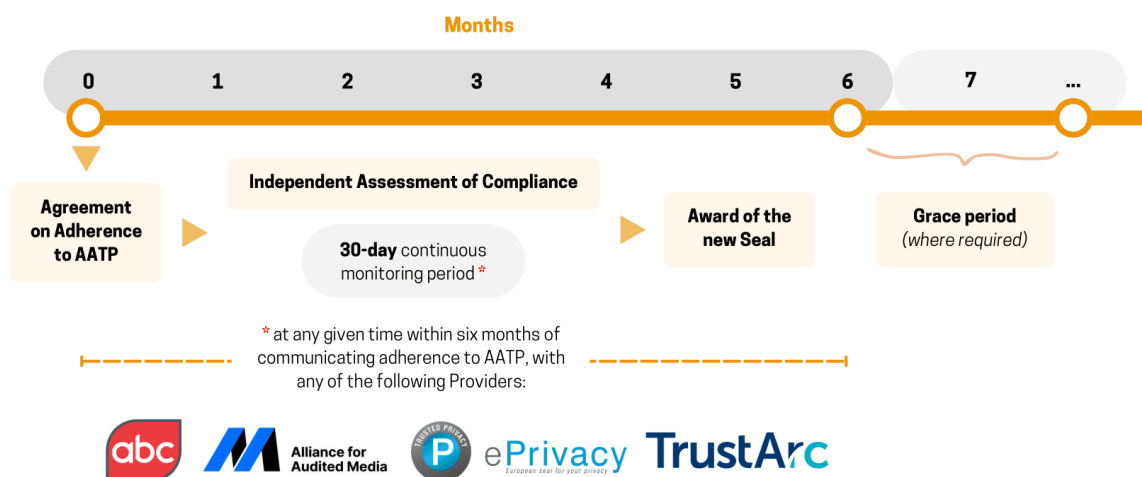
## Independent Certification

Your AATP compliance will be certified through a **three-step process** further supported by **independent Certification Providers that are EDAA-authorized for this purpose:**

1. **Agreement on adherence to AATP:** you must formally communicate your adherence to AATP to EDAA (this may include for instance licensing agreements or addenda thereof) and adjust your advertising transparency practices according to Programme requirements.;

*N.B. It may be noted that this is a simplification of the previous EDAA Self-Certification Criteria and Reporting Requirement, to ensure a more straightforward approach for participants whilst maintaining the rigour of the Programme.*

2. **Independent assessment of compliance:** you must engage an independent EDAA Programme Certification Provider who will assess your compliance to AATP over a 30-day observation period; a grace period is granted to address issues of non-compliance (where required);
3. **Award of the EDAA Trust Seal:** following this 30-day period and upon successful completion of the Independent compliance assessment, the EDAA Programme Certification Provider will award you an authorised "EDAA Trust Seal".



## Accountability

Accountability is designed along four dimensions:

1. **Consumer queries handling** by [Advertising Self-Regulatory Organisations \(SROs\)](#), that enables European consumers to submit questions about the ads they see online and the functioning of the digital advertising ecosystem as a whole. SROs answer consumers in their own language, offering direct responses or links to additional educational material.
2. **Consumer complaints handling** by [Advertising Self-Regulatory Organisations \(SROs\)](#), that enables European consumers to report programme non-compliance issues. Where applicable, companies commit to addressing in a timely and substantive manner to the requests of SROs.
3. **B2B recourse mechanism**

If the ad tech partners of the Online Platform (as this entity is defined under DSA and/or AATP) **do not** adequately provide transparency information via the AATP mechanisms, a resolution can be facilitated through an issue resolution centre enabled by EDAA, with the desired outcome to restore technical compliance of the respective ad tech partners. The role of the issue resolution centre will be akin to EDAA’s current role in monitoring and restoring functionality of companies within the programme when technical breakdowns occur.

4. **European Monitoring Exercises** conducted by SROs on an ad-hoc basis, at the request of EDAA, to verify compliance with specific AATP Principles.

## Timeline

Soft launch (done)	14 November 2023
Formal launch for implementation	February 2024
Certification grace period (launch date + 6 months)	August 2024



## Notes and FAQs

### 1. Is accountability and enforcement a necessary part of the Programme?

Accountability and enforcement are highly desirable elements for any industry-wide regulatory initiative for several reasons:

- Accountability and enforcement set out a clear path for companies deviating from the guiding Principles to regain compliance with the Programme, through a stepped approach that is foreseen to solve a majority of compliance issues.
- Accountability and enforcement ensure that all companies involved in the Programme act in a harmonised and predictable manner, particularly when it comes to requirements that involve a chain of actions by different actors (e.g. transmission of transparency information from advertisers to online platforms to consumers).
- Accountability and enforcement protect the credibility of the Programme and guarantee high standards of conduct to external ad tech companies, consumers, as well as regulators.
- Their existence combined with the essential role of independent certification offer reassurance of trustworthiness towards industry, regulators, and consumers alike.

### 2. Who is subject to Programme enforcement?

All companies participating in the Programme are subject to the enforcement procedures, regardless of their obligations (or lack thereof) under the DSA.