MSPA Technical Signaling Implementation Guidelines for Signatories and Certified Partners

Effective September 2, 2026

Version 1.6

1. INTRODUCTION.

1.1 Background & Scope.

The IAB Multi-State Privacy Agreement (the "MSPA") is a contractual framework that allows Signatories and Certified Partners in the digital advertising ecosystem to engage in Digital Advertising Activities in a way that complies with the requirements of Applicable State Privacy Laws. It does this by requiring Signatories (and Certified Partners as set forth in the Certified Partner Program) to set, send, receive, and honor Signals that indicate how they are complying with those laws' requirements, for example, by signaling whether a Signatory or Certified Partner has provided certain required notices to Consumers or whether a Consumer has Opted Out of Targeted Advertising.

The MSPA's signaling requirements are implemented using the IAB Tech Lab's Global Privacy Protocol ("GPP").[1] Signatories and Certified Partners have agreed to meet the MSPA's signaling requirements by following the Technical Signaling Implementation Guidelines set forth in this document (the "Guidelines").

These Guidelines apply to Covered Transactions pursuant to the MSPA and presuppose that a Covered Transaction is taking place.

The MSPA and the MSPA Certified Partner Program require Signatories to honor Global Opt-Outs, such as Global Privacy Control ("GPC")[2], to the extent required under Applicable State Privacy Laws[3], and pass corresponding Opt-Out Signals. If a Signatory or Certified Partner utilizes the opt-out field in the main section of a state string (i.e., MspaOptOut) in conjunction with the Gpc sub-section, this creates the potential for conflicting Signals. For example, a GPP string could include MspaOptOut=2 (indicating that the Consumer has not Opted Out of Sales of Personal Information and Targeted Advertising) and also include Gpc=1 (indicating that the Consumer's web browser had GPC enabled). This configuration of Signals is an example of conflicting Signals subject to Section 5.3 of the MSPA requiring the recipient of the Signals to interpret them in the way that results in the more limited Processing of Personal Information (i.e., would require them to give precedence to the Gpc=1 Signal and treat the User as Opted Out).

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[1] https://github.com/InteractiveAdvertisingBureau/Global-Privacy-Protoclol. Please note that as of April 30, 2024, the U.S. Privacy specification ("USP") was deprecated and may no longer be used to implement the MSPA's signaling requirements for California residents.

[2] *See* https://globalprivacycontrol.org/.

[3] These states include California, Colorado, Connecticut, Delaware, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, and Texas.

All Signal implementations must comply with Version 3 of the MSPA U.S. National Section Technical Specification upon its release and a transition period to implement the technical changes needed to adopt that version. **Such transition period will conclude on February 1, 2027 ("Transition Period")**, after which all Signal implementations must comply with Version 3 of the MSPA U.S. National Section Technical Specification. Guidance is provided in Appendix B for effectuating Signal during the Transition Period.

2. DEFINITIONS. Capitalized terms used, but not defined, in these Guidelines have the meaning assigned to them in the MSPA.

2.1 "MSPA Opt-Out Signal" means a Yes/No Signal set by a First Party pursuant to the MspaOptOut indicating whether the Consumer to whom the Signal pertains has Opted Out of the Sale or Sharing of Personal Information or the Processing of Personal Information for Targeted Advertising pursuant Applicable State Privacy Law.[4]

3. GPP SIGNALING REQUIREMENTS FOR FIRST PARTIES – ALL TRANSACTIONS.

3.1 Creating GPP Strings to Store and Communicate Signals Required by the MSPA. A First Party must create and send the Signals as required by the MSPA using the GPP specification and in accordance with these Guidelines.

3.2 Making Signals Available to Other Signatories and Certified Partners. A First Party must make GPP strings in connection with a Covered Transaction available to other Signatories or Certified Partners in that Covered Transaction, regardless of whether such transactions involve automated transmissions or Manual Transmissions of Personal Information, including through the use of the following mechanisms, as applicable:

(a) Consent Management Platform API;[5]

(b) Macros and/or URL parameters;[6] and

(c) Other reasonable and uniform methods of associating GPP strings with the Consumers to whom they relate, if Signatories or Certified Partners use Manual Transmissions of Personal Information (*e.g.*, batch file/server-to-server transfers of data). For example, a First Party may add a column in a structured data file reserved for GPP strings, so that each row (representing an individual Consumer or device) may have a GPP string associated with it. First Parties using this method to make GPP strings available to other Signatories or Certified Partners should ensure

[4] *See* Cal. Civ. Code 1798.120(a) and Cal. Code Regs. tits. 11, § 7026, Colo. Rev. Stat. 6-1-1306(1)(a)(I)(B), Conn. Gen. Stat. § 42-518(a), Del. Code Ann. tit. 6, § 12D-104(a)(6)(b), Fla. Stat. § 501.705(2)(e)(2), Iowa Code § 715D.3(1)(d), Ind. Code Ann. § 24-15-3-1(b)(5), Kentucky Act Sec. 3(2)(e), Minn. Stat. § 325O.07, Subd 1. (b), Montana Act Sec. 5(1)(e)(ii), Nebraska Act Sec. 7(e)(ii), N.H. Rev. Stat. 507-H:4(I)(e), New Jersey Act Sec. 7(a)(5), Oregon Act Sec. 3(1)(d)(B), Rhode Island Act 6-48.1-5(4), Tenn. Code Ann. 47-18- 3304(a)(2)(E)(i), Tex. Bus. & Com. Code § 541.051(b)(5)(B), Utah Code 13-61-201(4)(b), and Virginia Code 59.1-577(A)(5)(i).

[5] https://github.com/InteractiveAdvertisingBureau/Global-Privacy-Platform/blob/main/Core/CMP%20API%20Specification.md.

[6] https://github.com/InteractiveAdvertisingBureau/Global-Privacy-Platform/blob/main/Core/Consent%20String%20Specification.md#how-does-a-url-based-service-process-the-gpp-string-when-it-cant-execute-javascript.

that such Signatories or Certified Partners are aware of the specific method the First Party is using to associate GPP strings with Consumers and is able to recognize those GPP strings.

3.3 MSPA U.S. National Approach (General). First Parties must Process the Consumer's Personal Information pursuant to the MSPA as if the Consumer is a resident of each and every state with an Applicable State Privacy Law.[7] The First Party must then encode Signals pertaining to that Consumer accordingly via corresponding GPP strings. The technical specifications for U.S. National Consumers are available at https://github.com/InteractiveAdvertisingBureau/Global-Privacy-Platform/tree/main/Sections/US-National.

4. SIGNALING REQUIREMENTS FOR FIRST PARTIES.

4.1 MSPA U.S. National Approach (Signaling).

(a) Signaling How Consumer Notice Is Provided. The MSPA requires the First Party to provide certain notices to the Consumer as if the Consumer is a resident of each and every state with an Applicable State Privacy Law.[8] First Parties must set Signals using the GPP indicating whether they, in fact, provided such notice to Consumers as follows:

(i) MSPA Notice Signal. The section of the GPP string reserved for the U.S. National Approach for MSPA Signatories and Certified Partners includes a field named "MspaNotice." If the First Party **did** provide the Consumer with notice of the opportunity to Opt Out of Sales, Shares, and the Processing of Personal Information for Targeted Advertising in compliance with the MSPA, it should set this Signal to "Yes" (MSPANotice=2). If the First Party did not provide the Consumer with this notice **because it does not Sell or Share the Consumer's Personal Information or Process the Consumer's Personal Information for Targeted Advertising**, it should set this Signal to "No" (MSPANotice=1). **If the First Party does not meet the criteria for MspaNotice=1 or MspaNotice=2, as applicable to their Processing of Personal Information, then the First Party shall not engage in a Covered Transaction with respect to that particular Consumer's Personal Information.**

(1) Interactions with other Signals. If the First Party sets this Signal to "No" (MspaNotice=0), it should also set the MSPA Opt-Out Signal to "Not Applicable" (MspaOptOut=0).

(b) Signaling Consumer Choices. The MSPA requires a First Party to provide Consumers with a Choice Mechanism with respect to Sales, Shares, and the Processing of Personal Information for Targeted Advertising.[9] The First Party must set and send choice Signals using the GPP as follows:

(i) MSPA Opt-Out Signal. The section of the GPP string reserved for the U.S. National Approach includes a field named "MspaOptOut." If a Consumer **did** Opt Out

[7] *See* MSPA Section 3.1.
[8] *See* MSPA Section 4.3.

[9] *See* MSPA Section 4.4

of Sales, Shares, and/or the Processing of Personal Information for Targeted Advertising with the First Party pursuant to the MSPA, the First Party must set this Signal to "Yes" (MspaOptOut=1). If the Consumer **did not** Opt Out of such Sales, Shares, and/or the Processing of Personal Information for Targeted Advertising pursuant to the MSPA, the First Party should set this Signal to "No" (MspaOptOut=2). If the First Party did not provide the Consumer with an opportunity to Opt Out of Sales, Shares, and the Processing of Personal Information for Targeted Advertising **because it does not Sell or Share the Consumer's Personal Information or Process the Consumer's Personal Information for Targeted Advertising**, it should set this Signal to "Not Applicable" (MspaOptOut=0). If a First Party has set the Opt-Out Signal to "Yes" (MspaOptOut=1) based on a Consumer's choice to Opt Out, the First Party may update the Consumer's choice by setting the MSPA Opt-Out Signal to "No" (MspaOptOut=2) **only if** the Consumer has provided an Opt-Out Override to the First Party pursuant to the MSPA

(ii) MSPA Identifier. The section of the GPP string associated with the First Party's MSPA identifier from which the string originates. The First Party must include the MSPA Identifier in the GPP string upon successful registration.

5. SIGNALING REQUIREMENTS FOR DOWNSTREAM PARTICIPANTS

5.1 Retrieving and Passing Signals Made Available by other Signatories or Certified Partners. A Downstream Participant engaged in a Covered Transaction, regardless of whether such transactions involve automated transmissions or Manual Transmissions of Personal Information, must retrieve Signals made available by another Participant in connection with that transaction, and, if applicable, must pass those Signals to other Signatories or Certified Partners using the following mechanisms, as applicable:

(a) Consent Management Platform API;[10]

(b) The "Object: Regs," which contains any known legal, governmental, or industry regulations that are in effect, made available by a First Party in the OpenRTB specification;[11]

(c) Macros and/or URL parameters;[12] and

(d) Other reasonable and uniform methods specified by the Signatory or Certified Partner providing the Signals to associate with the Consumers to whom they relate, if such Signatory or Certified Partner uses Manual Transmissions of Personal Information for a Covered Transaction (e.g., batch file/server-to-server transfers of data). For instance, a First Party might add a column for GPP strings in a structured data file, where each row corresponds to an individual Consumer or device.

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[10] https://github.com/InteractiveAdvertisingBureau/Global-Privacy-Platform/blob/main/Core/CMP%20API%20Specification.md

[11] *See* https://github.com/InteractiveAdvertisingBureau/openrtb2.x/blob/main/2.6.md#323---object-regs-

[12] https://github.com/InteractiveAdvertisingBureau/Global-Privacy-Platform/blob/main/Core/Consent%20String%20Specification.md#how-does-a-url-based-service-process-the-gpp-string-when-it-cant-execute-javascript

5.2 Honoring Signals Received from Other Signatories or Certified Partners.

(a) MSPA U.S. National Approach (Signaling). If a Downstream Participant receives Signals in connection with a Covered Transaction, it must comply with the corresponding applicable requirements under the MSPA[13] and Applicable State Privacy Laws as follows:

(i) MSPA Opt-Out Signal. The MSPA regulates how Downstream Participants are permitted to Process Consumer Personal Information depending on whether a First Party Sells or Shares Personal Information or Processes Personal Information for Targeted Advertising, and, if it does, whether a Consumer has Opted Out of such Sales, Shares, and/or the Processing of Personal Information for Targeted Advertising. The MSPA Opt-Out Signal carries this information using the GPP field named "MspaOptOut." If a Downstream Participant receives an MSPA Opt-Out Signal set to:

(1) "No" (MspaOptOut=2), it should treat such Signal as indicating that the Consumer to whom the Signal relates **has not** Opted Out of Sales, Shares, or the Processing of Personal Information for Targeted Advertising pursuant to the MSPA.

(2) "Yes" (MspaOptOut=1), it must treat such Signal as indicating that the Consumer to whom the Signal relates **has** Opted Out of Sales, Shares, and/or the Processing of Personal Information for Targeted Advertising pursuant to the MSPA.

(3) "Not Applicable" (MspaOptOut=0), it must act as a Service Provider for the Covered Transaction to which the Signal relates for the relevant First Party pursuant to the MSPA.[14]

[13] *See* MSPA Section 5 and 6.
[14] *Id.*

APPENDIX A - CHANGE LOG

- **Version 1.0 (December 1, 2022)**
- **Version 1.1 (July 5, 2023)**
  - Extended support for U.S. privacy Signals under the MSPA until September 30, 2023.
  - Addressed conflicting Opt-Out Signals involving Global Opt Outs.
  - Updated references to account for latest MSPA amendment.
  - Updated references to account for finalization of the CCPA regulations.
  - Corrected typos and other errata.
- **Version 1.2 (August 31, 2023)**
  - Extended support for U.S. privacy Signals under the MSPA until January 31, 2024.
- **Version 1.3 (January 26, 2024)**
  - Extended support for U.S. privacy Signals under the MSPA until April 30, 2024.
- **Version 1.4 (October 21, 2024)**
  - Updated reference to account for new privacy laws in Florida, Iowa, Indiana, Kentucky, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, and Texas.
- **Version 1.5 (June 4, 2026)**
  - Aligned document to the amended MSPA, which supports only the U.S. National Approach for Covered Transactions. References to Opt-Out Option Mode and Service Provider Mode and state-by-state-based approaches removed.
- **Version 1.6 (September 2, 2026)**
  - Aligned document to the Version 3 of the MSPA U.S. National Section Technical Specification, including for a Transition Period from Version 2 to Version 3.

APPENDIX B – TRANSITION PERIOD

IAB Privacy recognizes that such Publishers and Downstream Participants will need to continue using Version 2 of the IAB Tech Lab's *GPP Extension: IAB Privacy's MSPA US National Technical Specification ("US National Technical Specifications"*) during the Transition Period, while they build to Version 3. IAB Tech Lab released Version 3 for public comment on August 11, and such comment period closes on September 11, 2026.

Publishers and Downstream Participants shall continue to set, send, receive, and comply with Signals during the Transition Period pursuant to these Technical Signal Implementation Guidelines V.5 ("TSIG V.5"). It shall do so by applying the translation of the core sections of V2 and V3 of the US National Technical Specifications as set forth in the chart below:

V. 2.0 Field Name	V. 3.0 Name
SharingNotice	MspaNotice
SaleOptOutNotice	MspaNotice
SharingOptOutNotice	MspaNotice
TargetedAdvertisingOptOutNotice	MspaNotice
SensitiveDataProcessingOptOutNotice	N/A
SensitiveDataLimitUseNotice	N/A
SaleOptOut	MspaOptOut
SharingOptOut	MspaOptOut
TargetedAdvertisingOptOut	MspaOptOut
SensitiveDataProcessing	N/A
KnownChildSensitiveDataConsents	N/A
PersonalDataConsents	N/A
MspaCoveredTransaction	N/A

V. 2.0 Field Name	V. 3.0 Name
MspaOptOutOptionMode	N/A
MspaServiceProviderMode	N/A

Section 4.1(a)(1) of this TSIG V. 5 has been restated to provide an example of how to use the core section translation chart:

> MSPA Notice Signal. The section of the GPP string reserved for the U.S. National Approach for MSPA Signatories and Certified Partners includes a field named "MspaNotice." [V.2 equivalent: SharingNotice, SaleOptOutNotice, SharingOptOutNotice, TargetedAdvertisingOptOutNotice] If the First Party **did** provide the Consumer with notice of the opportunity to Opt Out of Sales, Shares, and the Processing of Personal Information for Targeted Advertising in compliance with the MSPA, it should set this Signal to "Yes" (MspaNotice=2) [SharingNotice=1, SaleOptOutNotice=1, SharingOptOutNotice=1, TargetedAdvertisingOptOutNotice=1]. If the First Party did not provide the Consumer with this notice **because it does not Sell or Share the Consumer's Personal Information or Process the Consumer's Personal Information for Targeted Advertising**, it should set this Signal to "Not Applicable" (MspaNotice=1) [SharingNotice=0, SaleOptOutNotice=0, SharingOptOutNotice=0, TargetedAdvertisingOptOutNotice=0]. **If the First Party does not meet the criteria for MspaNotice=1 or MspaNotice=2, as applicable to their Processing of Personal Information, then the First Party shall not engage in a Covered Transaction with respect to that particular Consumer's Personal Information.**