

Dated: 14 January 2022

Subject: Reduction of the timestamps' precision in the TC String

Dear TCF CMPs,

The TCF Steering Group has approved amendments to the TCF Technical Specifications. As communicated in the advanced warning dated 21 December 2021, the changes apply to the values of the **Created** and **LastUpdated** fields in the [Core String](#), and need to be implemented on both existing and newly created TCF signals (TC Strings).

Further background as well as implementation deadlines are provided below.

Background

Under the GDPR, data controllers are required to create and maintain records of compliance, including, but not limited to user consent records. In this respect, the fields Created and LastUpdated are intended to help data controllers comply with their legal obligation and maintain online records that include a timestamp, in order to have an effective audit trail of how and when consent was given.

The LastUpdated field is also intended to help Publishers and their CMPs remind users of their right to object to processing or withdraw consent, as appropriate and at least every 13 months under the TCF Policy.

When considering a recommendation to the Steering Group to decrease the precision of both timestamps, the TCF Policies Working Group and the TCF Framework Signals Working Group took account of the following :

- Practical guidance from several DPAs relating to the various means that can be employed by data controllers to provide evidence of the consent obtained and its validity. In the context of TCF, a day-level timestamp of users' latest choices appears sufficient when maintaining records of consent ;
- Considerations related to the relevance of the Created field for publishers and their CMPs to fulfill the requirement of reminding users of their choices, as appropriate and at least every 13 months.

Technical Specifications amendments

1) The Created and LastUpdated fields have the **same value**, corresponding to the time when the TC String was last updated.



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2) The Created and LastUpdated fields' value is a **day-level timestamp**. To ensure backwards compatibility with existing implementations, the timestamp format has not been changed but hours, minutes and seconds have been zeroed out.

The [code library](#) that complements the technical specification will be updated in the coming weeks.

Next Steps

By April 14th 2022, CMPs must update their configuration to apply the necessary changes to their live installations. Please note that CMPs are not required to resurface the UI to accommodate this update on existing TC Strings.

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