Conditional Firing—The key to GDPR compliance

Conditional firing prevents data collection before a visitor provides consent by blocking tags until a trigger signal, i.e., the condition, is met. In this case, when a visitor consents to data processing.

**Conditional firing should be used any time consent is the legal basis to justify data processing.**

### Why is it important?

Without conditional firing set up you’re likely **not GDPR compliant** because you’re processing personal data of EU visitors without their consent.

### When do I need it?

You need conditional firing to stop tags from loading up in the background to **prevent personal data collection before consent is explicitly provided.**

### Conditional Firing in Practice

Conditional firing has separate requirements for tags that are hardcoded onto a page, versus tags housed within tag managers. Most websites use a combination of hardcoded tags along with tags hosted in tag managers.

#### Hardcoded

Hardcoded tags are embedded onto a site and fire automatically when the page loads. They must **receive consent via a wrapper** which unwraps to allow the tag inside to load.

#### Tag Managers

Most tag managers have built-in conditional firing capabilities based on events.

For GDPR compliance, you must **set up consent events** for tags in tag managers.
How Conditional Firing works

**Hardcoded vs. Tag Managers**

### Hardcoded Tags

- **Wrapper loads and checks for prior consent**
  - Yes: Wrapper allows tag within to fire
    - Consent received
  - No: Waits for new consent signals from CMP, i.e. each page load, and when users change consent preferences
    - Consent denied

### Tag Managers

- **Tag Manager loads and checks for prior consent**
  - Yes: Tag Manager triggers applicable vendor tags
    - Consent received
  - No: Waits for new consent signals from CMP, i.e. each page load, and when users change consent preferences
    - Consent denied

### Common pitfalls

**More than one tag per wrapper**
Placing all tags in one wrapper might seem like a quick solution, however, it creates problems if a visitor provides consent to some vendors, but not all. If partial consent is provided, the wrapper would either have to allow all tags to fire or none. This creates compliance concerns in the former scenario, and site functionality issues in the second.

**Improper configuration**
If conditional firing is improperly configured, tags may load prior to consent being given, load when they don’t receive consent, or just never load, again either violating a visitor’s rights or interfering with site functionality and monetization.
Conditional Firing Exceptions

TCF compliant supply-side platforms (SSPs) don’t need conditional firing to be compliant because, by default, they do not process personal data unless consent is provided. The first thing a TCF compliant SSP’s tag does when it loads is look for a CMP. If there is no CMP, it assumes no consent was given and holds an auction without processing personal data.

SSP Conditional Firing

- **Yes**
  - Checks if consent has been given before
  - Pass consent preferences downstream
  - Downstream vendors verify user consent preferences before proceeding with programmatic auction using personal data

- **No**
  - Assumes no Consent given
  - Pass consent preferences downstream
  - Downstream vendors verify user consent preferences before proceeding with programmatic auction without personal data

Common pitfalls with SSPs

- **The SSP loads before the CMP**
The first thing a TCF compliant SSP does is look for a CMP. If the SSP loads first, it will not find the CMP and will proceed to run an auction as if no consent was given. This means lowered CPMs and revenue.

- **The SSP is not TCF compliant**
If the SSP does not check for a CMP, it will require additional work to create a method that is able to balance compliance via conditional firing and any additional latency caused as a result.

Minimize Common Pitfalls

The pitfalls discussed are typically caused by human error. To lower the risk of such errors occurring, an ideal solution should automate as much of the process as possible. Even still, always remember to thoroughly test your implementations!