



## **Google delays 3P cookie deprecation...**

... but that shouldn't distract from preparing for a new privacy paradigm

Updated: April 26<sup>th</sup> 2024

**Better decisions, faster.**



## Policy and regulation continue to change around the world

### Google Chrome delays 3P cookie deprecation

This week, Google announced that its timeline to deprecate third-party cookies in Chrome entirely would be delayed for a third time following its announcement in early 2020. An updated timeline predicts the process will complete in early 2025.

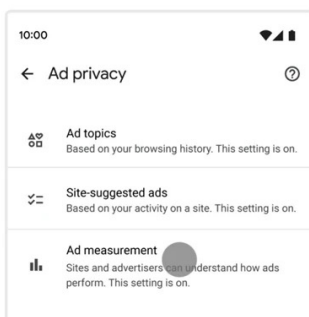
The deprecation of cookies is not the problem; other browsers, such as Safari and Firefox, completed this process some time ago. It's the solutions put in place to enable a viable yet compliant ad-tech ecosystem. This has proven problematic on competition, commercial, and privacy grounds.

In 2022, Google committed to abide globally by the UK Competition and Markets Authority assessments. The CMA has published regular updates on their analysis, including asking for results from industry tests to be shared by the end of June 2024.

Google reports that they will be unable to complete the switch in 2024 to work with CMA feedback and approval timings. The next CMA and Google quarterly updates, detailing specific issues and next steps, will be published on April 26th.

It has also been reported that the UK Information Commissioners Office (which deals with privacy matters) has concerns that need to be addressed; their report is due by the end of April.

In February, the IAB tech lab published the first of its assessments: a fit-gap analysis. Only 11 of 40 use cases and processes were supported or temporarily supported by Google's Privacy Sandbox. Illustrating various commercial, technical, governance, and transparency challenges. Google has challenged their findings, however.



The delay enables more time for all stakeholders to prepare for a seismic shift, but it's not the only change as global regulators increase focus.

### Tightening regulation

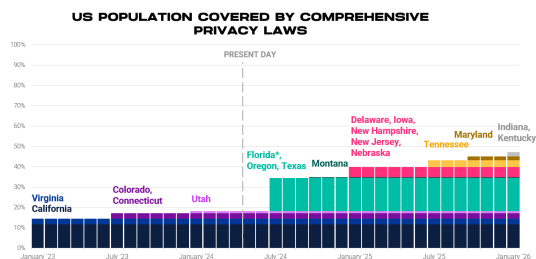
An opinion from the European Data Protection Board stated that large online platforms, such as Meta, are not allowed to limit the choice of consent to personalized advertising or paying a subscription, colloquially known as 'Pay or OK.'

Instead, a third choice to neither pay nor consent to personalized ads should be made available, with non-paying users seeing broadly targeted ads.

This opinion only applies to the platforms so large that it is hard not to have an account with them, so it is unlikely to apply to smaller publishers.

An OMG analysis examines the implications of the ruling and potential next steps.

In the US, the States have driven privacy regulations so far. 18 states have enacted legislation to be enforced by early 2026, with others to follow.



Federal regulation has moved more slowly. An effort called ADPPA stalled in Congress last year. The most recent attempt is the American Privacy Rights Act, a bipartisan, bicameral proposal that should insulate progress from being diverted by the upcoming election.

APRA is similar in scope to the EU's GDPR, which delivers consumer rights to access, correct, delete, and export data. It aims to provide a national framework for consumer privacy that will replace various state-level statutes.

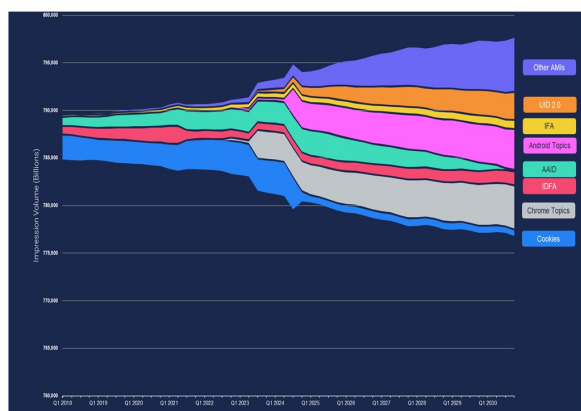
There will be higher requirements for large data holders and data brokers, such as audits and publishing privacy policies (like VLOPs in the EU DSA). Small businesses with less than USD 400m turnover or 200k identities managed will be excluded, reducing their administrative burden.

This bill would greatly harmonize regulations across the Atlantic, reducing barriers for companies operating across both regions.

## Future Signals 9

Greater [consumer awareness of data issues](#), especially the role brands need to play is also a critical consideration in the privacy conversation.

To this aim, OMG North America recently shared the [ninth edition of Future Signals](#): Evolution in the Age of Privacy. Having studied and shared perspectives on these issues for [several years now](#).



Future Signals explores how a wide variety of signals can be connected to improve performance across areas such as [the browser landscape](#), platform tools with [new generative capabilities](#), and [CTV, which enables better video targeting and measurement](#).

Measurement is a critical challenge in a changing data landscape, as legacy methods of capturing data are restricted. For example, Multi-Touch Attribution (MTA) is [significantly impacted](#) for cross-platform measurement due to reliance on 3P cookies; our pioneering [use of clean rooms](#) mitigates some of these challenges.

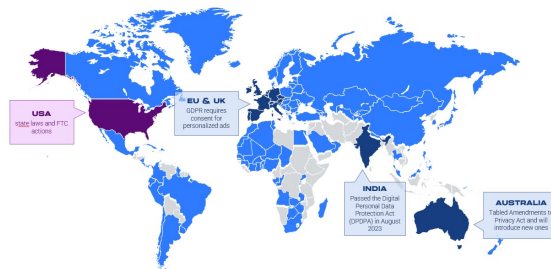
This has led to a [renaissance in Media Mix Modelling](#) (MMM). Several global platforms, such as [Meta's Robyn](#) and [Google's Meridian](#), have released open-source MMM approaches. OMG's Agile MMM solution fixes many of the [traditional problems](#) MMM faces, such as frequency of reporting and granularity.

Our approach is to [combine agile MMM and clean, empowered MTAs](#) while deploying [incremental testing to vet key recommendations](#).

This enables us to create a connected measurement framework that thrives within an increasingly regulated yet varied signal environment.

## Global Solutions

Most of the world's population is now covered by comprehensive legislation covering privacy, consumer rights, market protections, and, increasingly, AI.



OMG has developed numerous solutions to help advertisers, including;

- [Data Collection Privacy Diagnostic](#) to analyze consent management techniques and policies
- [Marketing Purpose Transparency Assessments](#) to identify potential gaps between data purpose and practice
- [Trusted Vendor List](#) is a systematized approach to data vendor risk management, tailored for each brand
- [A Chrome Cookieless Testing](#) framework to be fully prepared for 3P cookie deprecation
- [Consumer Privacy Profiles](#) to understand which aspects of data and privacy are important to customers
- [Privacy Experience](#) optimizes beyond legal requirements to communicate data practices
- [Ethical Decision Framework](#) to identify commitments based on corporate values and customer expectations.

The [Future Signals program](#) is designed to help clients navigate the twists and turns of changing policy and regulation by focusing on the underlying drivers of change, which are far more stable in the long term. We recently expanded [Future Signals to cover the EMEA region](#), and the next update is scheduled for early June.

As always, the [Annalect Privacy Hub](#) provides regular updates on these topics.



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