

From: Lauren Wakefield [REDACTED]
Subject: Re: Citizen Lab Right to Reply
Date: October 15, 2026 at 9:05 AM
To: [REDACTED]
Cc: [REDACTED]

LW

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Dear Ron,

Thank you for reaching out, and apologies for the delay in responding. Unfortunately, your original email was missed on our side.

We have since reviewed your questions and provided our responses below.

Why

was Discover-Tech Ltd. listed in the TCF GVL, despite information about the company's links to Eric Banoun, a major figure in the spyware industry, could be readily obtained from Israeli company records?

The listing of an entity in the

GVL does not mean that a company has been certified by IAB Europe as compliant with the GDPR across all its activities. The TCF is a voluntary policy and technical framework designed to help participants solicit and communicate users' privacy choices in a standardised manner. It does not replace the legal obligations of individual companies under the GDPR and ePrivacy rules, nor does it confer a blanket authorisation to process personal data.

Listing does not either require

any form of screening of links to individuals, as IAB Europe would not have the means or the justification for carrying out such verification.

However, if any person - whether a TCF participant or otherwise - has any particular concerns about a vendor, it remains possible to file a report with IAB Europe, as explained hereunder.

How does

IAB Europe screen vendors it lists in the GVL?

The process of getting a prospective

TCF participant listed on the GVL involves (i) verifying that information provided in a registration form - geared towards transparency, in accordance with the and not validation of business practices - is correct, and (ii) checking if the prospective TCF participant is a member of an industry standard or association or is a company in good standing (e.g. through requesting evidence of registration with whichever national registry of undertakings may be relevant).

In the case of Discover-Tech Ltd.,

it indicated being enrolled in the Verified

by TAG program, which was subsequently verified.

How does

IAB Europe prevent listing vendors in the GVL that are involved in the distribution of malicious ads, including spyware?

Which terms or policies does IAB Europe

have in place that prohibits vendors listed in the TCF from distributing malicious

ads, including spyware? How are these terms or policies monitored and enforced?

The

[TCF](#)

[Policies](#) and

[TCF](#)

[Terms and Conditions](#) contain various provisions aimed at ensuring that participating vendors comply with the key principles governing the TCF. Notably, IAB Europe (as managing organisation of the TCF) has the power to suspend or even revoke access by a vendor to the TCF in a number of circumstances, including where a vendor is in breach of the TCF Policies or where a vendor's acts, omissions, business activities or use of the TCF harm or damage (or are likely to harm or damage) the TCF.

IAB Europe operates a dedicated

Vendor Compliance Programme since 2021, which has evolved over time and now includes verification of vendor registration information and monitoring of live implementations against the requirements set out in the TCF Controls Catalogue.

These checks include whether vendors

respect users' consent choices before storing or accessing information on devices, whether cookie durations correspond to their GVL declarations, whether consent signals are handled correctly, and whether personal data is transmitted to other vendors only where the relevant legal-basis requirements are met.

The Compliance team either randomly

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selects vendors to perform proactive audits of their implementations, either following reports of suspected non-compliance from users, publishers, other vendors and market participants.

Where such a report of suspected

non-compliance is made, IAB Europe's Compliance team investigates the report and takes appropriate action (for instance, suspension or even revocation).

IAB Europe has published

[its](#)

[Catalogue of Policies & Technical Specifications Controls](#), which explains the various checks carried out under our Compliance Programmes and remediation procedures applicable when instances of non-compliance are identified.

How will

IAB Europe act upon the findings on Discover-Tech Ltd.?

Discover-Tech is already currently suspended from the GVL (since 8 October 2026) following an audit conducted

by IAB Europe under its TCF Compliance Programmes, which identified violations of the TCF Policies. Further confirmation of the findings regarding spyware could justify a definitive expulsion from the GVL, and IAB Europe have also recommended sharing the findings with relevant authorities (such as the Belgian cybersecurity authority, the CCB).

It is important to distinguish between IAB Europe's role in overseeing compliance with the TCF, a voluntary

policy and technical framework designed to help participants solicit and communicate users' privacy choices, and the investigation of unlawful activities such as the deployment of spyware that are conducted or take place outside the substantive scope of the

Framework. IAB Europe is neither equipped nor mandated to conduct forensic or criminal investigations of such activities. These matters fall within the remit of competent authorities.

Apologies again for the oversight and please don't hesitate to get in touch if you have any further questions.

Best wishes,
Lauren

On Thu, Oct 15, 2026 at 12:24 PM IAB Europe Communication [REDACTED] > wrote:

----- Forwarded message -----

From: **Ronald Deibert** [REDACTED]

Date: Thu, Oct 8, 2026 at 4:27 PM

Subject: Citizen Lab Right to Reply

To: [REDACTED]

Cc: [REDACTED]

To whom it may concern

Please find attached a letter concerning a forthcoming Citizen Lab report that references your company

Regards
Ron Deibert

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