

Cyber-Security, Data Protection and Privacy

Apple imposes new restrictions on tracking app users



Apple recently [announced](#) that its AppTracking Transparency Framework (“**ATT Framework**”) will go into effect along with the upcoming public release of iOS 14.5, iPadOS 14.5 and tvOS 14.5, which is scheduled for April 26, 2021.

This change will affect any application on Apple’s App Store that uses “tracking” for targeted advertising or advertising measurement purposes.

Per Apple, “tracking” consists of any linking of data collected from an app about a particular end-user or device, such as a user ID, device ID, or profile, with user or device data collected from other companies’ apps, websites, or offline properties, or to sharing user or device data with a data broker.

Tracking includes, for example, displaying targeted advertisements based on data collected from apps owned by other companies or sharing a list of identifiers (such as email addresses or Advertising IDs, as defined below) with a third-party to retarget those users in other developers’ apps or to find similar users.

Up until now, iPhone users could proactively change their settings to disable tracking. Starting with iOS 14.5, Apple shifts the responsibility to the developers and requires them to ask for permission first, using the ATT Framework.

In order to comply with Apple’s new policy and avoid rejection by the App Store, developers that use tracking in their app should take the following steps:

1. Use the [ATT Framework](#) in the app to request users for permission to track them or to access their Apple generated advertising ID (“**Advertising ID**”).
2. Declare in the product’s App Store page any other form of tracking (such as the sharing of email addresses with others). A developer cannot use identifiers other than the Advertising ID to track users without receiving their permission through the ATT Framework.
3. Provide information about the [app’s privacy practices](#), including the practices of third-party partners whose code is integrated into the app, in App Store Connect.
4. Include a purpose string in the system prompt to explain why you would like to track the user, for example “your data will be used to deliver personalized ads to you”.

It is important to note that [Apple’s ID for Vendors \(IDFV\)](#), may still be used for analytics across apps from the same content provider. However, it may not be combined with other data to track a user across apps and websites owned by other companies unless the user has granted permission for tracking, using ATT Framework.

Non-compliance with the ATT Framework may lead to suspension or removal of the relevant app from the App Store. Therefore, it is essential for companies that use ‘tracking’ in their apps to take the necessary measures to comply with the ATT Framework as soon as possible.

Please feel free to contact us with any questions that you have on this matter.

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