

BBB NATIONAL PROGRAMS
DIGITAL ADVERTISING
ACCOUNTABILITY PROGRAM

DIGITAL ADVERTISING
ACCOUNTABILITY PROGRAM,
Challenger,

AUDIOMOB,
Corporation.

Case No. 147-2026
Filed March 4, 2026

FINAL DECISION

I. Synopsis

The Digital Advertising Alliance’s (DAA) Self-Regulatory Principles (DAA Principles)¹ cover entities engaged in interest-based advertising (IBA) across websites or mobile applications (apps). Any operator of a website (a first party)² that allows unaffiliated entities (third parties)³ to collect visitors’ web browsing data for IBA

¹ The DAA’s interest-based advertising principles consist of a suite of four documents: the Self-Regulatory Principles for Online Behavioral Advertising (OBA Principles), the Self-Regulatory Principles for Multi-Site Data (MSD Principles), the Application of Self-Regulatory Principles to the Mobile Environment (Mobile Guidance) and the Application of the Self-Regulatory Principles of Transparency and Control to Data Used Across Devices (Cross-Device Guidance) (collectively, the Principles). The full text of the Principles can be found at <http://www.aboutads.info/principles>.

² The DAA Principles assign responsibilities to an entity based on its role in a particular situation. Thus, an entity can be a first party, third party, or service provider depending on the function it is performing. Website operators are first parties. OBA Principles Definition F at 10 (“A First Party is the entity that is the owner of the Web site or has Control over the Web site with which the consumer interacts and its Affiliates.”). See also Accountability Program, First Party Enhanced Notice Compliance Warning, CW-01-2013, <https://assets.bbbprograms.org/docs/default-source/daap/program-guidance/accountability-program-first-party-enhanced-notice-compliance-warning-cw-01-2013.pdf>. In the context of mobile applications, the first party is defined as the entity that owns or exercises control over the app, or its affiliates. Mobile app publishers are first parties under the Mobile Guidance. See Mobile Guidance Definition G at 7.

³ In the desktop context, third parties are entities that collect data for IBA from non-affiliate websites. See OBA Principles Definition J at 11 (“An entity is a Third Party to the extent that it engages in Online Behavioral Advertising on a non-Affiliate’s Web site.”). In the mobile app context, the term “third party” refers to entities that collect data for IBA through non-affiliate mobile apps, Mobile Guidance Definition N at 12 (“An entity is a Third Party to the extent that it collects Cross-App or Precise Location Data from or through a non-Affiliate’s application, or collects Personal Directory Data from a device.”).

must provide visitors with notice and enhanced notice as prescribed in the Self-Regulatory Principles for Online Behavioral Advertising (OBA Principles). Mobile app publishers that authorize third parties to collect data through their apps for use in cross-app IBA must provide users with notice and enhanced notice, as described in the Application of Self-Regulatory Principles to the Mobile Environment (Mobile Guidance).

Audiomob, a mobile-focused advertising platform, participated in the Accountability Program’s investigation of its third-party advertising practices. Following the investigation, Audiomob updated its Privacy Policy and in-app enhanced notice to better guide consumers on how data can be used for IBA and how to opt out, if desired.

II. Company Status

Audiomob is a London-based advertising platform that helps advertisers better reach their consumers (including consumers based in the U.S.) and helps game developers further unlock potential through audio-enabled advertisements. Audiomob facilitates audio ads to 300 million users in 160 countries.⁴ As an advertising platform that facilitates IBA across non-affiliate platforms, Audiomob meets the definition of a Third-Party Advertiser under the DAA Principles.⁵

III. Inquiry

This case arises from the Accountability Program’s ongoing monitoring of websites and mobile apps. When looking at a non-affiliate website that Audiomob does not operate, the Accountability Program identified a third-party targeted advertisement served to the Accountability Program staff by Audiomob. These advertisements displayed text at the top of the ads that directed users to a “Report Ad” link. When users clicked the link, it directed users to an in-app reporting page with no clear, meaningful, or prominent indication of where users could access IBA-specific disclosures. Specifically, the page included the following prompt: “Thank you for taking the time to report this ad. Even though we take efforts to prevent ads which may violate our policies from running before reviewed, some ads may run before our specialists check them.” The reporting page also included a dropdown menu with the following ad violation categories: 1) Inappropriate, 2) Repetitive, 3) Irrelevant, and 4) Other. There was no clear, meaningful, or prominent mechanism where users could access IBA-specific disclosures and view opt-out choices. As such, Audiomob did not provide adequate third-party notice under the DAA Principles.

⁴ Audiomob, “About”, Audiomob.com, <https://audiomob.com/about>.

⁵ See OBA Principles, Definitions § J at 11.

IV. Issues Raised

A. Mobile data collection

1. Third-party duties under the Mobile Guidance

The Mobile Guidance adapts the desk-oriented rules of the OBA Principles to the mobile environment. Third parties that engage in IBA must provide transparency (notice and enhanced notice) and consumer control (an easy-to-use opt-out from IBA) when collecting or using consumers' browsing data for IBA on non-affiliate mobile applications.⁶

a) Third-Party Notice of IBA practices

Under section III.A.1 of the Mobile Guidance, a third party must provide a clear, meaningful, and prominent notice of its IBA data collection and use practices, a statement of adherence to the DAA Principles, and a description of an easy-to-use mechanism for consumers to exercise choice regarding data collection for IBA.⁷

b) Third Party Enhanced Notice of Mobile Data Collection for IBA

Under section III.A.2 of the Mobile Guidance, a third party must, in addition to providing notice as described directly above, provide enhanced notice of IBA collection.⁸ Specifically, a third party can provide enhanced notice in mobile apps by providing a clear, meaningful, and prominent link to DAA-required disclosures in or around an advertisement.⁹

c) Consumer control

Section III.B.1 of the Mobile Guidance establishes companies' responsibilities for providing consumers with an easy-to-use method of exercising choice with respect to the collection and use of their data for IBA.¹⁰ This choice mechanism should be available from a link in or around an advertisement, from an industry-developed consumer choice page, or from a first party's enhanced notice link.¹¹

V. Company response and analysis

In response to the Accountability Program's inquiry letter, Audiomob conducted a comprehensive review of its compliance with the DAA Principles in order to identify

⁶ See generally Mobile Guidance, available at https://digitaladvertisingalliance.org/sites/aboutads/files/DAA_files/DAA_Mobile_Guidance.pdf.

⁷ Mobile Guidance, Section III.A.1 at 14.

⁸ Mobile Guidance, Section III.A.2 at 14-15.

⁹ Mobile Guidance, Section III.A.2(a)(i) at 15.

¹⁰ Mobile Guidance, Section III.B.1 at 18-19.

¹¹ *Id.*

any areas in its compliance protocols that needed strengthening. The company worked quickly and diligently to find practical solutions to each issue and consulted with the Accountability Program on its plan to come into compliance with the DAA Principles.

To meet its third-party notice obligations, Audiomob made substantial changes to its in-app advertising features and privacy policy. To improve consumer transparency, choice, and help users better navigate its privacy policy and identify IBA-relevant disclosures, Audiomob made the following updates.

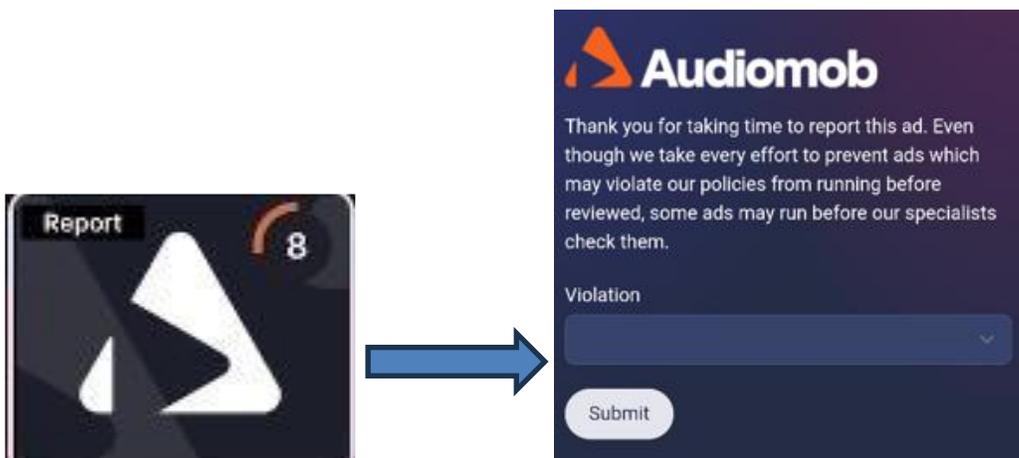
A. Mobile data collection

1. In-App Enhanced Notice and Reporting Page Updates

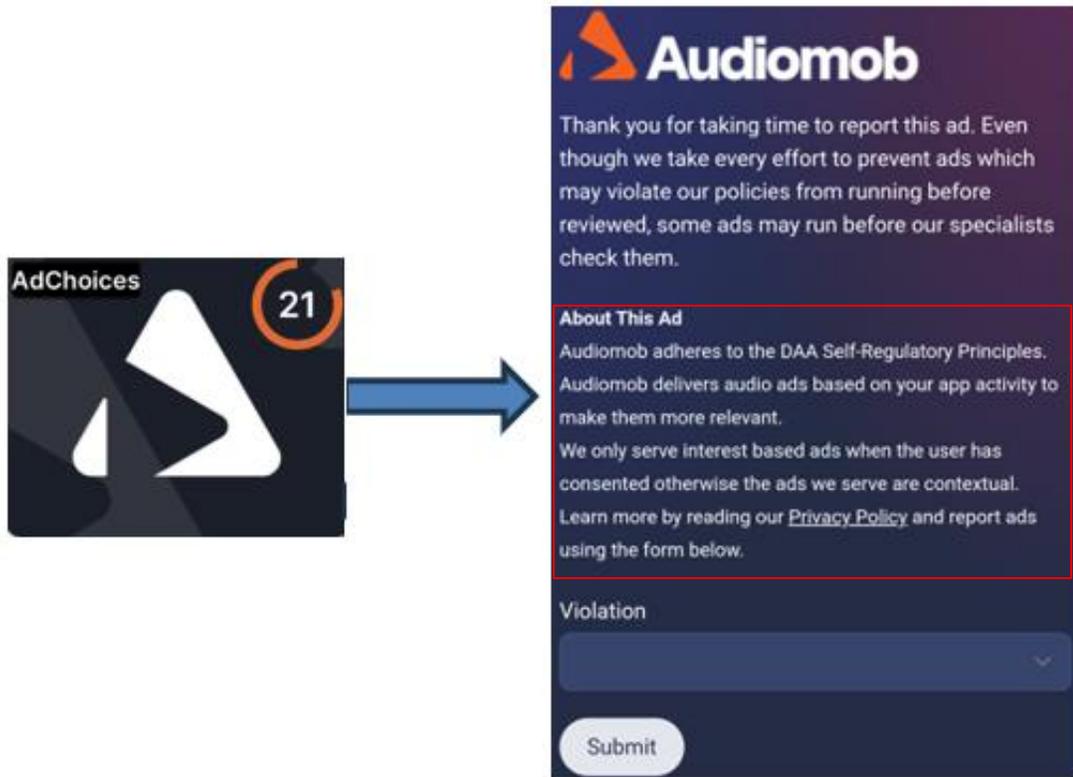
Audiomob has implemented updates to its software development kit (SDK) to include “AdChoices” text next to the audio ads. When users click on this text, they are directed to an updated notice and reporting page. This page now includes the following language: “Audiomob adheres to the DAA Self-Regulatory Principles. Audiomob delivers audio ads based on your app activity to make them more relevant. We only serve interest based ads when the user has consented otherwise the ads we serve are contextual. Learn more by reading our Privacy policy and report ads using the form below.” The reporting form includes the same options that the Accountability Program noted in the inquiry stage. Lastly, the link in the bolded sentence takes users directly to Section 10 of the privacy policy (retitled to “Interest-Based Advertising Opt-Out and Consent Management” based on the Accountability Program’s suggestion). Further updates to the privacy policy are discussed below (Section V.A.2 of this decision – “Privacy Policy Updates”).

These updates make it easier for consumers to review information about interest-based advertising and review more detailed information in Audiomob’s privacy policy.

In-App Enhanced Notice and Reporting Page Updates **Previous Display**



Current Display



2. Privacy Policy Updates

Audiomob made significant updates to its privacy policy to align with the in-app advertising updates detailed above. Audiomob added a hyperlink at the top of its privacy policy stating: "Click [here](#) for your choices regarding Interest Based Advertising." This link takes users to Section 10, retitled "Interest Based Advertising Opt-Out and Consent Management." Section 10 of Audiomob's privacy policy includes new disclosures related to the DAA, including a statement of adherence to the DAA Principles and a link to the DAA-developed IBA opt-out tool. Audiomob also updated its device-level instructions for consumers to set advertising preferences (for iOS and Android users).

Audiomob's Privacy Policy Updates (see boxed portions)

Privacy Policy

Last Updated: 8th December 2025

Click [here](#) for your choices regarding Interest Based Advertising

10. Interest-Based Advertising Opt-Out and Consent Management

Digital Advertising Alliance (DAA) Self-Regulatory Principles

Audiomob adheres to the Digital Advertising Alliance (DAA) Self-Regulatory Principles for Online Behavioral Advertising and the Application of Self-Regulatory Principles to the Mobile Environment.

Audiomob only serves interest-based advertisements when users have provided explicit consent through a recognised CMP. Where consent has not been granted, Audiomob delivers contextual advertisements that do not rely on cross-app or behavioural data.

Users may manage or withdraw consent at any time through the consent management tools provided within the apps or platforms where Audiomob ads appear.

Ads delivered by Audiomob include an information icon ("i") that enables users to report ads or learn more about our data processing practices.

For more information on the DAA Principles, please visit <https://youradchoices.com/control>

Apple App Tracking Transparency (ATT) & iOS Opt Out

For iOS devices, Audiomob fully respects Apple's App Tracking Transparency ("ATT") framework. If a user selects "Ask App Not to Track," Audiomob does not access the IDFA or any data that would be considered tracking under Apple's policies. In such cases, only contextual advertising is delivered and no cross-app or behavioural tracking takes place.

You can adjust the advertising preferences in iOS, visit Settings > Privacy > Advertising > Limit Ad Tracking

Please note that instructions may slightly vary across different operating systems and version updates.

Google Android Opt Out

You can also adjust the advertising preferences Android, visit Settings > Google Ads > Opt out of Interest-based ads.

Please note that instructions may slightly vary across different operating systems and version updates.

By making these changes, Audiomob ensured that consumers wishing to learn more about how their data is being collected and used by third parties would be directed to relevant information about their choices. These changes bring Audiomob's third-party notice into compliance with the DAA Principles.

VI. Company statement

At Audiomob, privacy and transparency are fundamental to how we operate. We welcomed the opportunity to work with the Digital Advertising Accountability Program and are pleased with their acknowledgement that Audiomob is compliant with the DAA Principles.

VII. Disposition of decision

Practices voluntarily corrected.