

# Verifying Measurement Vendor Independence

## A 3-Part Audit Checklist

Independence in measurement is a structural property, not a marketing claim. A vendor's independence shows up in three places: where the data originates, who controls the analytical environment, and how the vendor's tag is classified by consent management platforms. These twelve questions surface independence as a verifiable fact. Bring them to any vendor conversation, including ours.

### SECTION 1 — DATA ORIGIN

#### 1. Where does the data underlying the vendor's attribution model originate — first-party from your site and systems, third-party purchased, or platform-shared?

Yes  Partial  No

*Why it matters:* First-party data from the advertiser's own systems is the only foundation that gives the advertiser standing to question results. Third-party and platform-shared data carry the orientation of their source. Ask for a written description of every data input by source and purpose.

#### 2. Does the vendor's data acquisition include any platform-improvement clauses — provisions that route your measurement data back to platforms for targeting use or model training?

Yes  Partial  No

*Why it matters:* Platform-improvement clauses appear in DMP and clean-room contracts and convert measurement data into targeting fuel. Read the Master Services Agreement directly, not the privacy policy. The MSA describes data use; the privacy policy describes consumer disclosure. They are frequently different documents.

#### 3. Is the data flow auditable end-to-end — can you trace a single conversion from its source through to its appearance in the attribution report?

Yes  Partial  No

*Why it matters:* An auditable chain of custody is what separates measurement from opinion. Vendors who decline to walk the trace either lack the infrastructure or have a reason to keep the flow opaque. Both warrant follow-up.

### SECTION 2 — ENVIRONMENT CONTROL

#### 4. Is the analytical environment operated by the vendor, or by a platform whose products are being measured?

Yes  Partial  No

*Why it matters:* A measurement program run inside a platform's environment is measuring through the eyes of the entity being measured. Amazon Marketing Cloud, Google's discontinued Privacy Sandbox, and similar successors are useful tools, but the environment is set by the party with a stake in the answer.

#### 5. When clean rooms or measurement sandboxes are used, who controls the inputs, outputs, methodology defaults, and what can be exported?

Yes  Partial  No

*Why it matters:* Clean rooms restrict what can leave the environment. That restriction is reasonable for privacy; it is also a constraint on independent verification. Knowing exactly what is exportable, and on what terms, defines the limit of what the vendor can prove.

#### 6. Can the vendor demonstrate measurement workflows that operate fully outside any single platform's infrastructure?

Yes  Partial  No

*Why it matters:* Independence requires the technical capacity to measure across platforms without depending on any one of them. A vendor that cannot demonstrate this capacity is structurally limited to measuring inside a single party's view.

### SECTION 3 — CONSENT AND DATA USE

#### 7. How is the vendor's tag classified by the Consent Management Platform on your site — under essential / measurement purposes, or under marketing / advertising purposes?

Yes  Partial  No

*Why it matters:* Consent categories are assigned by the CMP based on how the tag's data is actually used, not by the vendor's self-description. A measurement-only vendor's tag lands in the essential or measurement / analytics category. A vendor whose product includes targeting, audience-building, or identity-graph enrichment lands in marketing / advertising — even when the vendor presents itself as a measurement company. The same CMP, on the same site, classifies vendors differently based on actual data flows. This is verifiable in under a minute on your own CMP dashboard.

#### 8. What categories of data does the vendor's tag actually collect, and what does it do with each category once collected?

Yes  Partial  No

*Why it matters:* Independence is observable in the data collection scope, not in the contract language alone. A measurement-only vendor collects what attribution requires and nothing more — no audience builds, no identity-graph enrichment, no off-platform data syndication. The list of collected fields and their downstream uses should be a one-page document the vendor produces on request.

#### 9. Can the vendor document the legal basis under which it operates for each data-use purpose on advertiser-owned properties?

Yes  Partial  No

*Why it matters:* Legal basis (consent versus legitimate interest, by purpose) defines what protections apply and what changes if regulatory frameworks shift. A vendor that operates measurement under legitimate interest on first-party advertiser properties has a different posture than one running both measurement and targeting under aggregated consent. Either can be valid; clarity on which is in use is the requirement.

### SECTION 4 — ECONOMIC INDEPENDENCE

#### 10. Does the vendor's revenue come exclusively from advertisers, or also from publishers, platforms, media partners, or preferred-vendor programs?

Yes  Partial  No

*Why it matters:* Where the vendor's revenue comes from is where the vendor's interest sits. A measurement company funded partially by publishers or platforms has a structural orientation toward those partners regardless of its measurement methodology.

#### 11. Are there ownership or board overlaps between the vendor and any of the platforms, publishers, or media businesses it measures?

Yes  Partial  No

*Why it matters:* Ownership and governance ties show up in board composition, parent-company structure, and equity stakes. Public records and SEC filings answer this directly for traded entities; private vendors warrant a direct conversation about their cap table at the partner level.

#### 12. Is the vendor's financial structure compatible with the 12-to-18-month time horizon a measurement engagement takes to fully prove out?

Yes  Partial  No

*Why it matters:* Private-equity-owned vendors operate on exit timelines that may compress before the program reaches full effectiveness. Founder-led and stably-financed vendors operate on longer horizons. Neither is wrong; the time horizon should be explicit and aligned with the program.

# Vendor Independence Scorecard

Tally Yes / Partial / No for each vendor across the twelve dimensions. Any 'Partial' or 'No' under Data Origin or Consent Category Audit deserves follow-up regardless of total score — independence on those dimensions is binary in practice.

#	Dimension	Vendor A	Vendor B	Vendor C
1	Data origin — first-party vs. third-party vs. platform-shared			
2	MSA-level platform-improvement / model-training clauses			
3	End-to-end auditable conversion trace			
4	Analytical environment operated by vendor (not measured platform)			
5	Clean room / sandbox export and methodology controls			
6	Cross-platform workflow independence (technical capacity)			
7	CMP-assigned consent category (measurement vs. targeting)			
8	Data collection scope — only what attribution requires			
9	Documented legal basis for each data-use purpose			
10	Revenue exclusively from advertisers			
11	No ownership / board overlaps with measured parties			
12	Financial structure aligned with 12–18 month engagement horizon			
<b>TOTAL (12 possible) →</b>				

**How to read the result.** A vendor scoring above 9/12 across all four sections operates with structural independence. A vendor below 6/12 carries enough orientation toward measured parties to warrant a different conversation. The middle range is where documentation requests, MSA review, and follow-up conversations move the answer.

**For a personalized version of this analysis** — sized in your own revenue, channels, and current measurement approach — take the 90-second Fit Assessment at [c3metrics.com/fit-assessment](https://c3metrics.com/fit-assessment). Same reference principles applied to your specific program, one page out the other side, ready to share with a CFO or operating partner.