

Friction & CCPA Rights Request Processes

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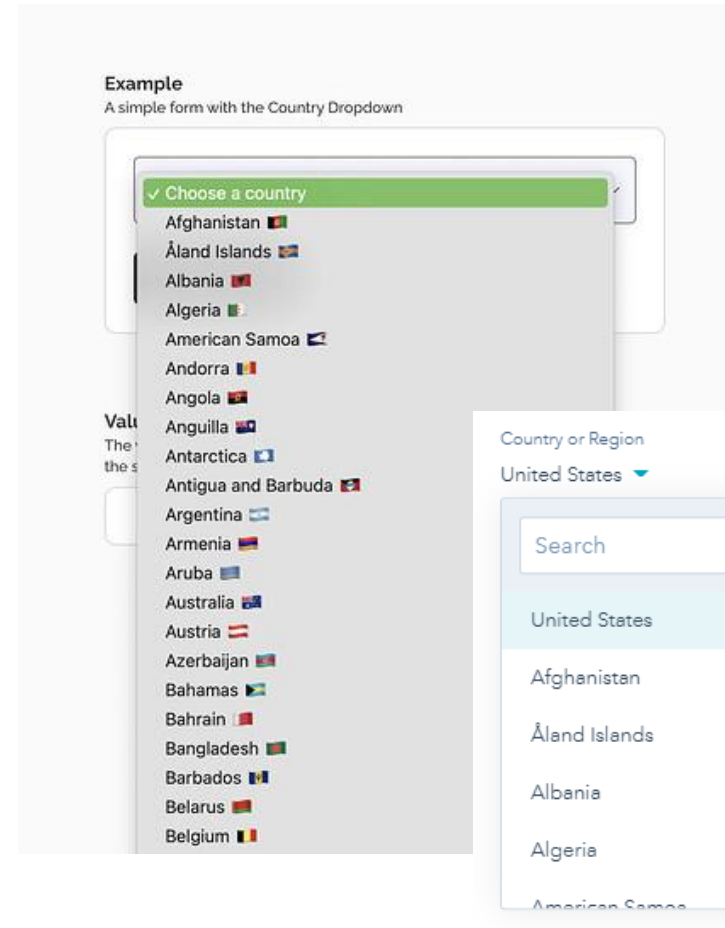
Nov. 5, 2026

Talk Overview

- What is friction?
- How friction manifests in California privacy rights requests
- How do consumers think about privacy policies & cookies
- Key takeaways from the academic research
- Discussion/questions

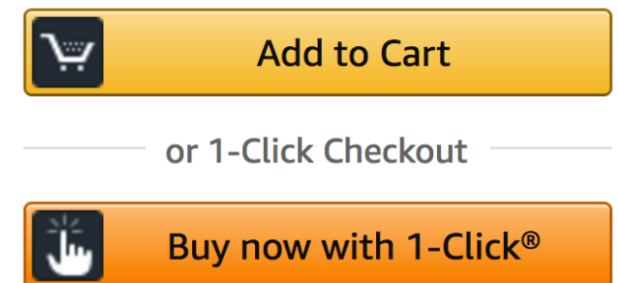
Defining Friction

- **Cognitive friction:** “The resistance encountered by a human intellect when it engages with a complex system of rules that change as the problem changes.” – Alan Cooper, *The Inmates Are Running The Asylum* (1999/2004)
- Design obstacles that interfere with accomplishing a goal/task



High friction:
paging
through a
list of 100+
countries

Low
friction: 1-
Click
checkout



Friction is not always a negative



- Friction for *good*:**
- Prevents harms from too little friction
 - Forces users to think rather than simply act

How CCPA Prescribes Design

- CCR Title 11 § 7004 (Rights requests and consumer consent):
 - Easy to understand
 - Symmetry in choice
 - Avoid confusing language & design
 - Avoid choice architecture that impairs or interferes with choice
 - **Avoid friction** (easy to execute)
 - Methods that do not comply with the above may be dark patterns

Limits on requests to opt out of sale/sharing

- CCR Title 11 § 7026:
 - **Cookie banners are not a sufficient opt-out:** (a)(4) A notification or tool regarding cookies, such as a cookie banner or cookie controls, is not by itself an acceptable method for submitting requests to opt-out of sale/sharing because cookies concern the collection of personal information and not the sale or sharing of personal information. An acceptable method for submitting requests to opt-out of sale/sharing must address the sale and sharing of personal information.
 - **No account creation required** (c)
 - **Opt-outs of sale/sharing cannot require verification** (d)

US Privacy Habits & Knowledge

Majorities have turned off cookies, but some digital habits vary by age

% who say they ever ___ to manage their privacy online



* Based on social media users.

Note: Those who did not give an answer or who do not use the internet are not shown.

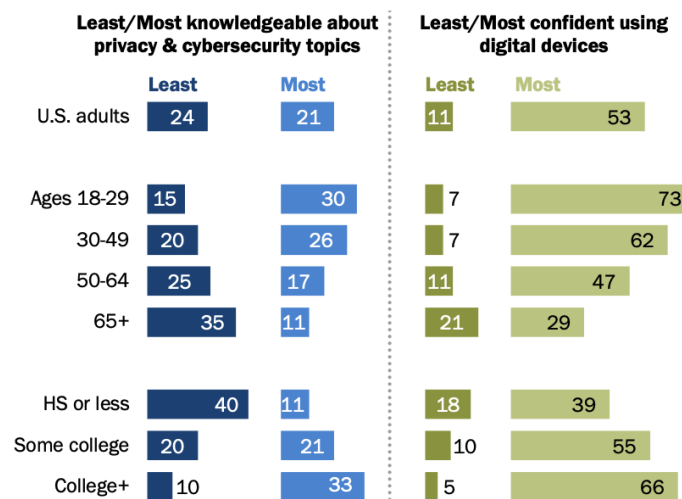
Source: Survey of U.S. adults conducted May 15-21, 2023.

"How Americans View Data Privacy"

PEW RESEARCH CENTER

Privacy and cybersecurity knowledge and confidence in digital skills vary by age and education

% of U.S. adults who fall into each of the following groups



Note: Knowledge is based on five-question series. Least knowledgeable group answered 0 or 1 correctly; most knowledgeable group answered 4 or 5 correctly. See topline for full question wording. Least confident includes those who say they are not at all or only a little confident using digital devices to do the things they need to do online. Most confident includes those who say they are very confident. Those who did not give an answer or who gave other responses are not shown.

Source: Survey of U.S. adults conducted May 15-21, 2023.

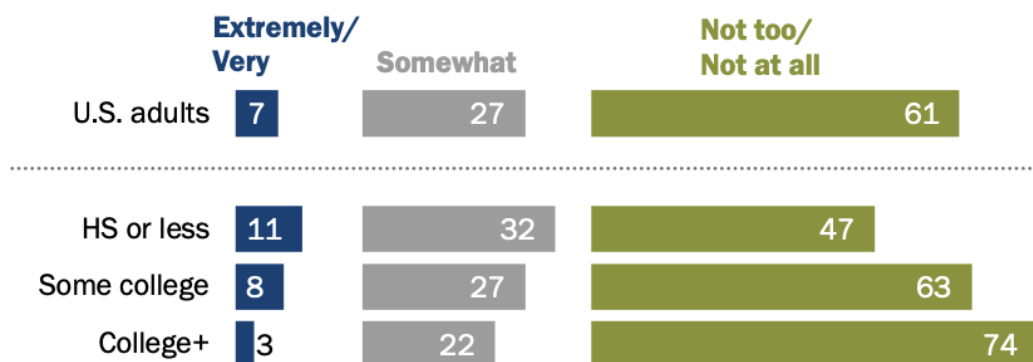
"How Americans View Data Privacy"

PEW RESEARCH CENTER

US Attitudes Towards Privacy Policies

Americans largely see privacy policies as ineffective for communicating how companies use people's data

% of U.S. adults who think privacy policies are a(n) ___ effective way for companies to share how they are using people's data



Note: Those who did not give an answer or who do not use the internet are not shown.

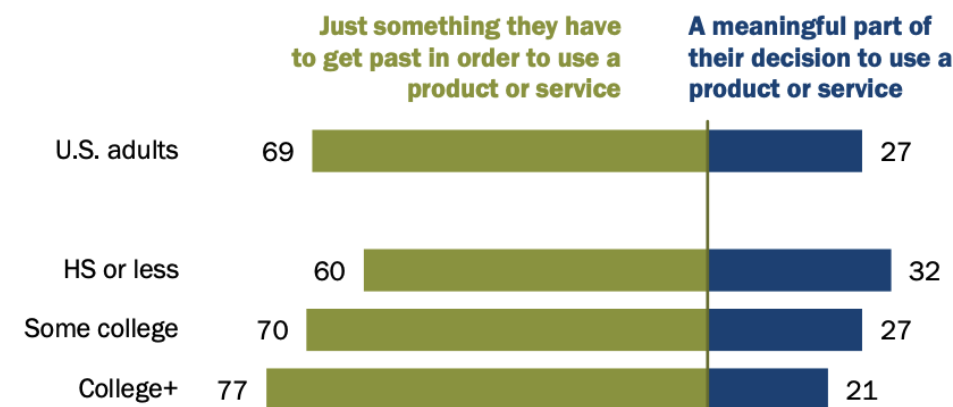
Source: Survey of U.S. adults conducted May 15-21, 2023.

"How Americans View Data Privacy"

PEW RESEARCH CENTER

Roughly two-thirds of U.S. adults say privacy policies are just something they have to get past to use a product; this varies by education

% of U.S. adults who say privacy policies are ...



Note: Those who did not give an answer or who do not use the internet are not shown.

Source: Survey of U.S. adults conducted May 15-21, 2023.

"How Americans View Data Privacy"

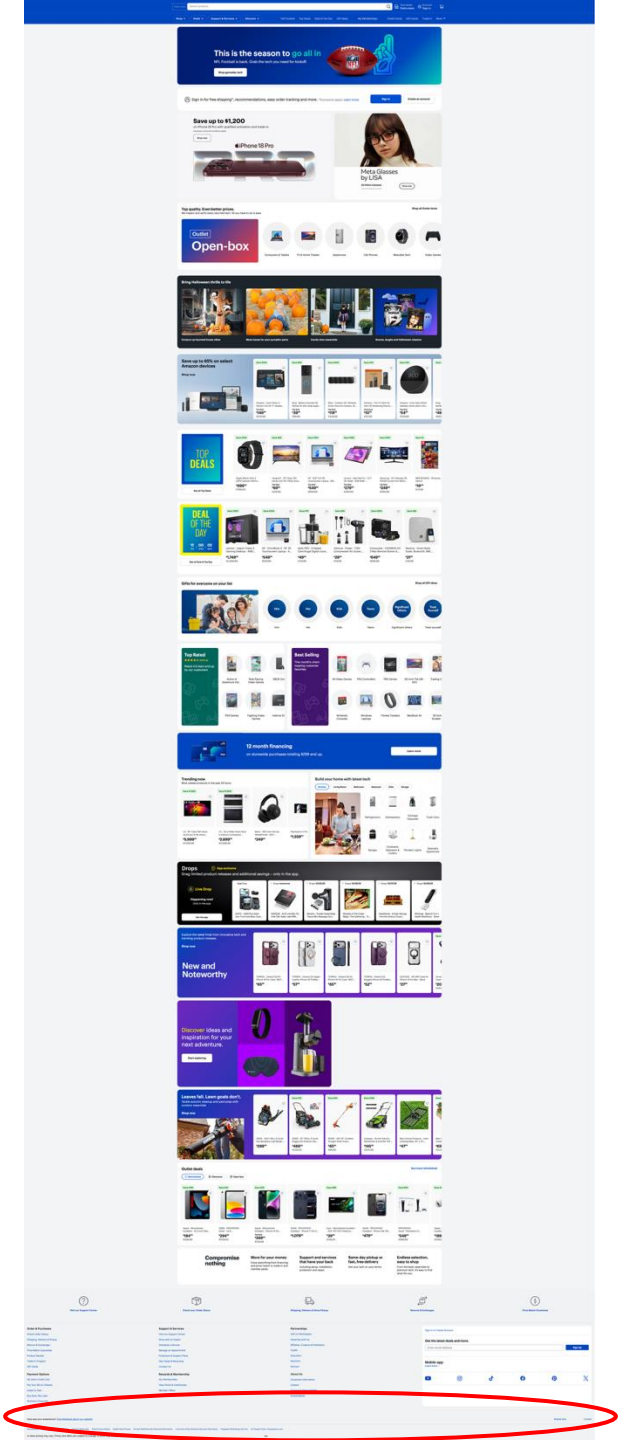
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Evaluating rights request flows like an expert

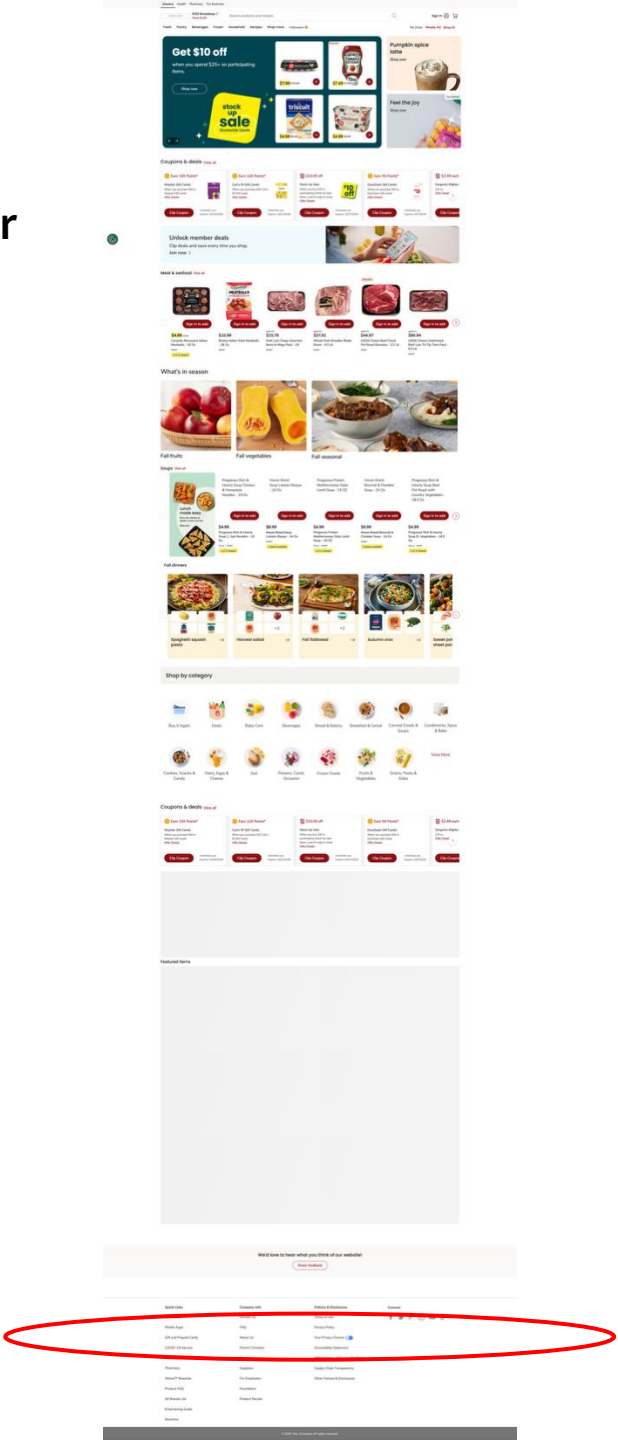
- We'll conduct a quick walk-through of four Do Not Sell flows:
 - Compare two submitting forms using a Do Not Sell link
 - Compare two using on cookie toggles
- Who is “The User?” Yes, you, but also:
 - Literally any adult in California! Age 18 – 100+
 - Not necessarily English speaking or English literate
 - Not necessarily educated
 - May have little online skills/experience
 - YOUR experience is not THE experience

Homepage: Electronics Retailer

Where are the
CCPA Do Not Sell
My Personal
Information links?



Homepage: Grocery Retailer



Step 1: Locate the Do Not Sell link

Grocery Retailer – Page Footer



Quick Links

- Our Brands
- Mobile Apps
- Gift and Prepaid Cards
- COVID-19 Vaccine
- Find Your Local Store
- Pharmacy
- Atmos™ Rewards
- Product FAQ
- All Brands List
- Entertaining Guide
- Business

Company Info

- Contact Us
- FAQ
- About Us
- Parent Company
- Careers
- Suppliers
- For Employees
- Foundation
- Product Recalls

Policies & Disclosures

- Terms of Use
- Privacy Policy
- Your Privacy Choices  
- Accessibility Statement
- HIPAA Notice of Privacy Practices
- Supply Chain Transparency
- Other Policies & Disclosures

Connect



2

Welcome to the Privacy Rights Portal

Privacy Choices & Rights

Our [Privacy Policy](#) explains how we collect, use, process, and share personal data. But when it comes to your data, you have choices too. This includes the ability to ask for access to the personal data we have collected about you or to ask us to correct or delete your data. Additionally, you can ask to opt out of the sale or sharing of your data. If you're interested in exercising any of these options, you can select the relevant link below to submit a privacy request.

Customer

- [Data Access request](#)
- [Data Deletion request](#)
- Data Correction – You can update your contact information in the app or by contacting [Customer Support](#)
- [Do Not Sell or Share data request](#) (including for targeted advertising and profiling)
- [Consumer Health Data request \(CT, NV, WA\)](#)
- Right to Limit the Use of Your Sensitive Personal Data (California Only) - At this time, we do not process information that is subject to this limitation. At a future point when we do so, you can direct us to limit the use of your Sensitive Personal Data to uses that are reasonably necessary to provide our goods and services or as needed for specific purposes. See our [Privacy Policy](#) for more information.

Job Applicant (California Only)

- [Data Access request](#)
- [Data Deletion request](#)
- Data Correction – You can access your submitted job application through the [Career Site](#) Manage Profile selection. Once logged in you are able to modify application details.

Employee / Contractor (California Only)

- [Data Access request](#)

3

YOUR LOGO

Welcome to Privacy Rights Request Portal!

Please complete all fields marked with an asterisk (*) to submit this request form.

CONSUMERS (INCLUDING CUSTOMERS, GUESTS, AND PATIENTS) OR THEIR AUTHORIZED AGENTS CAN USE THIS FORM TO SUBMIT A REQUEST TO OPT OUT OF THE SALE OR SHARING OF PERSONAL DATA OR PROCESSING OF PERSONAL DATA FOR TARGETED ADVERTISING OR PROFILING IN FURTHERANCE OF DECISIONS THAT PRODUCE LEGAL OR SIMILARLY SIGNIFICANT EFFECTS.

Please provide information about the **consumer** below.

To submit a Right to Know or Right to Delete request, [click here](#).

* **Does the consumer have an existing online account with us?**

Privacy Rights

For more information on your privacy rights and our privacy practices please visit our [Privacy Policy](#).



I'm not a robot



reCAPTCHA

Total Steps: 4 from homepage footer to submission

Single rights request form: must use a different path to submit Right to Know, Delete.

Inconsistent terminology: “data access” vs. “right to know”

No form title: what request was this again?

Consent Management Platform: retailer uses a CMP to manage process

Multi-state: handles multiple US states

CAPTCHA: not necessary



Welcome to Privacy Rights Request Portal!
Please complete all fields marked with an asterisk (*) to submit this request form.

CONSUMERS (INCLUDING CUSTOMERS, GUESTS, AND PATIENTS) OR THEIR AUTHORIZED AGENTS CAN USE THIS FORM TO SUBMIT A REQUEST TO OPT OUT OF THE SALE OR SHARING OF PERSONAL DATA OR PROCESSING OF PERSONAL DATA FOR TARGETED ADVERTISING OR PROFILING IN FURTHERANCE OF DECISIONS THAT PRODUCE LEGAL OR SIMILARLY SIGNIFICANT EFFECTS.

Please provide information about the **consumer** below.

To submit a Right to Know or Right to Delete request, [click here](#).

* Does the consumer have an existing online account with us?

Yes

No

* State of Residence of Consumer

California



Consumer's First Name

Consumer's Last Name

* Consumer's Email

* Consumer's Phone Number

Format: 999-999-9999

Privacy Rights

For more information on your privacy rights and our privacy practices please visit our [Privacy Policy](#).



I'm not a robot



reCAPTCHA

Submit

Step 1: Locate the Do Not Sell link



Homepage footer: Electronics retailer

Order & Purchases
[Check Order Status](#)
[Shipping, Delivery & Pickup](#)
[Returns & Exchanges](#)
[Price Match Guarantee](#)
[Product Recalls](#)
[Trade-In Program](#)
[Gift Cards](#)

Payment Options
[My Store Credit Card](#)
[Pay Your Bill at Citibank](#)
[Lease to Own](#)
[Buy Now, Pay Later](#)
[Business Financing](#)

Support & Services
[Visit our Support Center](#)
[Shop with an Expert](#)
[Schedule a Service](#)
[Manage an Appointment](#)
[Protection & Support Plans](#)
[Haul Away & Recycling](#)
[Contact Us](#)

Rewards & Membership
[My Memberships](#)
[View Points & Certificates](#)
[Member Offers](#)

Partnerships
[Sell on Marketplace](#)
[Advertise with Us](#)
[Affiliates: Creators & Publishers](#)
[Health](#)
[Education](#)
[Business](#)
[Partner+](#)

About Us
[Corporate Information](#)
[Careers](#)
[Corporate Responsibility](#)
[Sustainability](#)

[Sign in or Create Account](#)

Get the latest deals and more

Mobile app
[Learn more ›](#)



How was your experience? [Give feedback about our website](#)

[Accessibility](#) [Terms & Conditions](#) [Privacy](#) [Interest-Based Ads](#) [State Privacy Rights](#) [Health Data Privacy](#) [Do Not Sell/Share My Personal Information](#) [Limit Use of My Sensitive Personal Information](#) [Targeted Advertising Opt Out](#) [CA Supply Chain Transparency Act](#)

In-store pricing may vary. Prices and offers are subject to change. © 2026 Your Company. All rights reserved.

ies.

State Privacy Rights Health Data Privacy

Do Not Sell/Share My Personal Information Limit Use of My Sensitive Personal Information **Targeted Advertising Opt-Out**



Do Not Sell Or Share My Personal Information

Different state laws have different requirements for advertising opt-outs. If you aren't a California resident please click [here](#).



What is your state of residence:

- ☒ California
- ☐ Colorado
- ☐ Connecticut
- ☐ Delaware
- ☐ Indiana
- ☐ Iowa
- ☐ Kentucky
- ☐ Maryland
- ☐ Minnesota
- ☐ Montana
- ☐ Nebraska
- ☐ New Hampshire
- ☐ New Jersey
- ☐ Oregon
- ☐ Rhode Island
- ☐ Tennessee
- ☐ Texas
- ☐ Utah
- ☐ Virginia
- ☐ Other

Do Not Sell Or Share My Personal Information

Our purpose is to enrich lives through technology. One way we seek to fulfill that purpose is to tell you about technology or other products and services that we think you'll find useful (or just fun and interesting). And if we think we've found something you might like, we'll send marketing messages or place advertisements to you on our digital properties or try to have them placed on others' digital properties.

"Do Not Share" for California Residents

A Do Not Share request will cause us to take actions designed to stop cross-context behavioral advertising to you (which in our context means attempting to place advertisements intended for you on others' digital properties). Please look for the "Do Not Sell Or Share My Personal Information" options box on this page, select your state of residence, click the blue "Do Not Sell Or Share My Personal Information" button, and provide the information requested. We also will honor a Do Not Sell request from this website when you do so (more information on Do Not Sell follows). For our mobile app, go to My Account (you may just see your name if you're logged in), click on App Settings and locate the Privacy section. It may take us up to 15 days to process your request here or in our app.

We do not require that visitors log in to their store account to place a request online or in the app, but please note that we can best honor your request if you are logged into your account. If you choose not to log in, or don't have a store account, to best ensure we can honor your request we recommend submitting it again if you visit our site with a different browser or device or if you clear cookies on this browser.

Please note that you may still see advertisements from us when you are online. For example, let's say you enter "awesome consumer electronics" when doing an online search. We may have asked your search-engine provider to show a store ad to anyone who makes such a search. You'll see such an ad from us, but it's only based on your search terms and has nothing to do with any information about you we may have shared with that search-engine provider.

"Do Not Sell"

Under California, Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia law, certain sharing of information for advertising purposes may be considered a "sale" of "personal information." For example, if you've visited our digital properties within the past 12 months and you've seen ads, under California, Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia laws personal information about you may have been "sold" to our advertising partners for their own use.

How to opt-out of the Sale of Information Related to You

For our website, click on "Do Not Sell Or Share My Personal Information" on this page and follow the instructions. If you have an account with us, please log in to your account to best ensure that we apply the Do Not Sell request to information about you.

- **Opt-out cookie:** An opt-out cookie will be placed and stored on your browser, for Do Not Sell purposes, preventing personal information from being made available from this website to advertising partners for their own use, independent of us.
- **Only this browser on this device:** The opt-out cookie only applies to the browser you were using and only for the device you were using at the time you made the selection. If you access our websites from other browsers or devices, you will also need to make this selection on each browser and device.

For our mobile app, go to My Account, click on App Settings and locate the Privacy section. When you activate the Do Not Sell function of our mobile app, the app will no longer make personal information available to our advertising partners for their own use, independent of us. It's also possible that portions of the app may not function as intended. If you delete the app, you will need to adjust your settings to opt-out if you ever reinstall the app.

A few things to keep in mind regarding Do Not Sell.

- **Ads and interest-based advertising:** You will still see ads. You are not opted out of interest-based advertising. To opt-out of interest-based advertising, visit [www.aboutads.info/choices](#).
- **If you delete or clear cookies, you'll need to click the button again the next time you visit to re-select Do Not Sell.** If you delete or clear your cookies, that will delete our opt-out cookie and you will need to opt-out again.
- **Your Do Not Sell selection won't cross from the website to mobile application (or the other way round):** If you click the "Do Not Sell Or Share My Personal Information" or "Do Not Sell My Personal Information" on this website, your Do Not Sell selection will not transfer to our mobile app. Similarly, your activation of the Do Not Sell feature on the mobile app won't apply to the website. You'll need to do both.

What about Global Privacy Control?

● GPC Enabled and Detected

If you have enabled Global Privacy Control, we will recognize the GPC signal when you visit our website and we'll prevent personal information from being made available from the website to advertising partners for their own use, independent of us. If we detect the GPC signal, you will see an indicator above this paragraph. If you do not see the indicator, we have not detected the GPC signal.

- If you have an account with us, you must log in when visiting our digital properties to best ensure we apply a Do Not Sell request to information about you.
- **CA Residents:** If you also wish to request that we not share personal information about you for cross-context behavioral advertising, please look for the "Do Not Sell Or Share My Personal Information" options box on this page, select your state of residence, hit the blue "Do Not Sell Or Share My Personal Information" button, and provide the information requested.
- **CO, CT, DE, IN, IA, KY, MD, MN, MT, NE, NH, NJ, OR, RI, UT, TN, TX, & VA Residents:** If you also wish to opt out of targeted advertising, please see our [Targeted Advertising Opt Out](#) page.

Want more information?

To learn more about how the company collects, uses and shares information, [see our Privacy Policy](#).

- Extremely long and dense page of text
- "Want more information" link leads to the company's privacy policy – which isn't typically informative; why not CalPrivacy's website?

3

Sign in or create your account

☐ Keep me signed in. [i](#)

 By continuing or signing in, you agree to our [Terms and Conditions](#), [Privacy Policy](#), and [Membership Terms](#).

[Continue](#)[Sign in with a Passkey](#)[Sign in with Apple](#)[Sign in with Google](#)

Don't have an account? [Create an account](#)

Don't have a store account? [Continue Without Signing In](#)

4

Enter your information.

We'll use this information to look for a match in our records. Keep in mind that the info we have on file might not be your current info.

State
CA - California

We **will not** update our records with the information you provide here, other than to keep a record of your request.

[Send Request](#)[Cancel](#)

Total Steps: 5 from homepage footer to submission

Sale/sharing rights only: must use a different path to submit other requests

Was this process necessary?: page notes that this process was cookie based . . . So the form fill-outs weren't necessary for a non-registered user?



You've completed your request to opt-out of the sale and sharing of personal information.

What happens next:

If we find a match for your information in our records, we'll take action designed to stop cross-context behavioral advertising to you (which in our context means attempting to place advertisements intended for you on others' digital properties). If you did not log into your account while submitting your request, our ability to take action on your request may be limited because we can't link your request to you in the future or on other browsers or devices. To better ensure a comprehensive opt out, please submit your request again and log into your account.

You've also been opted out of the "sale" of personal information from this website

Here's what you need to know:

- When you submitted this request, we placed a cookie on your browser to opt you out of the sale of your personal information from this website
- This action only effects this device, with this browser.
- If you use our mobile app, you'll need to activate the Do Not Sell function of the mobile app - your submission here won't impact the app.
- If you later delete or clear the opt-out cookie, you'll need to submit a new opt-out request

For further details, see our [Do Not Sell or Share My Personal Information](#) page.

Do Not Sell Or Share My Personal Information

California law gives you the right to control how your personal information is shared with third parties. You can choose to opt out of the sale of your personal information to third parties.

What is your state of residence?

☐ All other states
☐ California
☐ Connecticut
☐ Delaware
☐ Florida
☐ Georgia
☐ Hawaii
☐ Illinois
☐ Indiana
☐ Iowa
☐ Kansas
☐ Kentucky
☐ Louisiana
☐ Maine
☐ Maryland
☐ Massachusetts
☐ Michigan
☐ Minnesota
☐ Missouri
☐ Montana
☐ Nebraska
☐ Nevada
☐ New Hampshire
☐ New Jersey
☐ New Mexico
☐ New York
☐ North Carolina
☐ North Dakota
☐ Ohio
☐ Oklahoma
☐ Oregon
☐ Pennsylvania
☐ Rhode Island
☐ South Carolina
☐ South Dakota
☐ Tennessee
☐ Texas
☐ Utah
☐ Vermont
☐ Virginia
☐ Washington
☐ West Virginia
☐ Wisconsin
☐ Wyoming

Do Not Sell*

☐ Yes, I want to opt out of the sale of my personal information to third parties.
☐ No, I do not want to opt out of the sale of my personal information to third parties.

How to opt out of the Sale of Information Related to You

When you opt out of the sale of your personal information to third parties, we will not sell or share your personal information to third parties for their direct or indirect financial benefit. We will not sell or share your personal information to third parties for their direct or indirect financial benefit.

A few things to keep in mind regarding Do Not Sell.

When you opt out of the sale of your personal information to third parties, we will not sell or share your personal information to third parties for their direct or indirect financial benefit. We will not sell or share your personal information to third parties for their direct or indirect financial benefit.

What about Global Privacy Control?

Global Privacy Control (GPC) is a new standard for privacy that allows you to opt out of the sale of your personal information to third parties. We support GPC and will honor your GPC signal.

Want more information?

For more information about your privacy rights, please visit [www.donotsellmyinfo.com](#).

Sign in or create your account

Phone number or email address

☐ Keep me signed in

☐ By continuing or signing in, you agree to our Terms and Conditions, Privacy Policy, and Marketing Terms.

Don't have an account? [Create an account](#).
 Don't have a store account? [Continue Without Signing In](#).

Enter your information.

We'll use this information to look for a match in our records. Keep in mind that the info we have on file might not be your current info.

First Name

Last Name

Alias or Nickname Optional

Other or Former Last Name Optional

Address

Address Line 2 Optional

City

State
 CA - California

ZIP Code

Phone

Email

We will not update our records with the information you provide here, other than to keep a record of your request.

[Cancel](#)

You've completed your request to opt-out of the sale and sharing of personal information

What happens next:

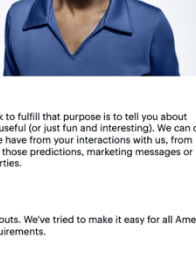
If we find a match for your information in our records, we will stop cross-context behavioral advertising to you (we mean attempting to place advertisements intended for you based on your interests and preferences). If you did not log into your account while our ability to take action on your request may be limited, we will attempt to take action on your request to ensure a comprehensive opt-out, please submit your request to your account.

You've also been opted out of the "sale" of your information to third parties on this website.

Here's what you need to know:

- When you submitted this request, we placed a cookie on your device to ensure you are opted out of the sale of your personal information.
- This action only affects this device, with this browser.
- If you use our mobile app, you'll need to activate the mobile app - your submission here won't affect the mobile app.
- If you later delete or clear the opt-out cookie, you may need to re-submit your request.

For further details, see our [Do Not Sell or Share My Personal Information](#) page.



Advertising Opt-Outs

Different state laws have different requirements for advertising opt-outs. If you are a California resident, please click [here](#).



What is your state of residence:

- ☒ California
- ☐ Colorado
- ☐ Connecticut
- ☐ Delaware
- ☐ Indiana
- ☐ Iowa
- ☐ Kentucky
- ☐ Maryland
- ☐ Minnesota
- ☐ Montana
- ☐ Nebraska
- ☐ New Hampshire
- ☐ New Jersey
- ☐ Oregon
- ☐ Rhode Island
- ☐ Tennessee
- ☐ Texas
- ☐ Utah
- ☐ Virginia
- ☐ Other

Targeted Advertising Opt-Out

Our purpose is to enrich lives through technology. One way we seek to fulfill that purpose is to tell you about technology or other products and services that we think you'll find useful (or just fun and interesting). We can develop our prediction of your preferences or interests using information we have from your interactions with us, from information we have obtained from data brokers, or both. Based on those predictions, marketing messages or advertisements may be sent to you on our and others' digital properties.

Opt-Out Rights

Different state laws have different requirements for advertising opt-outs. We've tried to make it easy for all Americans to make an opt-out choice that meets or exceeds applicable legal requirements.

"Targeted Advertising"

Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia residents can choose to opt-out of receiving advertisements placed by us on others' digital properties when we've used information from data brokers to predict your preferences or interests ("Targeted Advertising"). Just go to the Targeted Advertising opt-out options on this page, select your state of residence and click on the blue "Targeted Advertising opt-out" button. When using our Mobile App, go to My Account (you may just see your name if you're logged in), click on App Settings and locate the Privacy section.

Please note that you may still see advertisements from us when you are online. For example, let's say you enter "awesome consumer electronics" when doing an online search. We may have asked your search-engine provider to show a store ad to anyone who makes such a search. You'll see such an ad from us, but it's only based on your search terms and has nothing to do with any other prediction we would have made about your preferences or interests.

"Do Not Sell My Personal Information"

Under California, Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia laws, certain sharing of information for advertising purposes may be considered a "sale" of "personal information." Residents of these states have the right to opt-out of the "sale" of personal information, and we've made it easy for a resident of any state to stop the information transfers that might be considered such a "sale."

- If you have a store account, please log in to best ensure we can effectively apply your request.
- Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia Residents:** For our website, we will take action to honor your Do Not Sell request after you go to the Advertising Opt-Out options box located on this page, select your state of residence, click on the blue "Targeted Advertising Opt-Out" button, and provide the information requested. If instead you select the "Do Not Sell My Personal Information" button you will not be opted out of Targeted Advertising.
- California Residents:** California law provides additional requirements for advertising opt-outs and a different interpretation of "sale." To learn more about exercising your California rights, click [here](#).
- All Other States:** For our website, click on the "Do Not Sell My Personal Information" button located on this page.

For our mobile app, go to My Account, click on App Settings and locate the Privacy section.

What will happen after I click the "Do Not Sell My Personal Information" button?

After you click the "Do Not Sell My Personal Information" button:

- Opt-out cookie:** An opt-out cookie will be placed and stored on your browser, for Do Not Sell purposes, preventing personal information from being made available from this website to advertising partners for their own use, independent of us.
- Only this browser on this device:** The opt-out cookie only applies to the browser you were using and only for the device you were using at the time you made the selection. If you access our websites from other browsers or devices, you will also need to make this selection on each browser and device.

Additionally, when you activate the Do Not Sell function of our mobile app, the app will no longer make personal information available to our advertising partners for their own use, independent of us. It's also possible that portions of the app may not function as intended. If you delete the app, you will need to adjust your settings to opt-out if you ever reinstall the app.

A few things to keep in mind regarding Do Not Sell.

- Ads and interest-based advertising:** You will still see ads. You are not opted out of interest-based advertising. To opt out of interest-based advertising, visit [www.aboutads.info/choices](#).
- If you delete or clear cookies,** you'll need to click the button again the next time you visit to re-select Do Not Sell. If you delete or clear your cookies, that will delete our opt-out cookie and you will need to opt-out again.
- Your Do Not Sell selection won't cross from the website to mobile application (or the other way round):** If you click the "Do Not Sell Or Share My Personal Information" or "Do Not Sell My Personal Information" on this website,

You're opting out of the "sale" of personal information.

Here's what you need to know:

- We can best honor this request if you are logged in to a store account.
- When you submit this request, we'll place a cookie on your browser to opt you out of the "sale" of your personal information from this website.
- This cookie will only take effect on this device, with this browser. If you visit this website with a different device or browser, you will need to make the request again.
- If you use our mobile app, you'll need to activate the Do Not Sell function of the mobile app - your submission here won't impact the app.
- If you later delete or clear the opt-out cookie, you'll need to submit a new opt-out request.

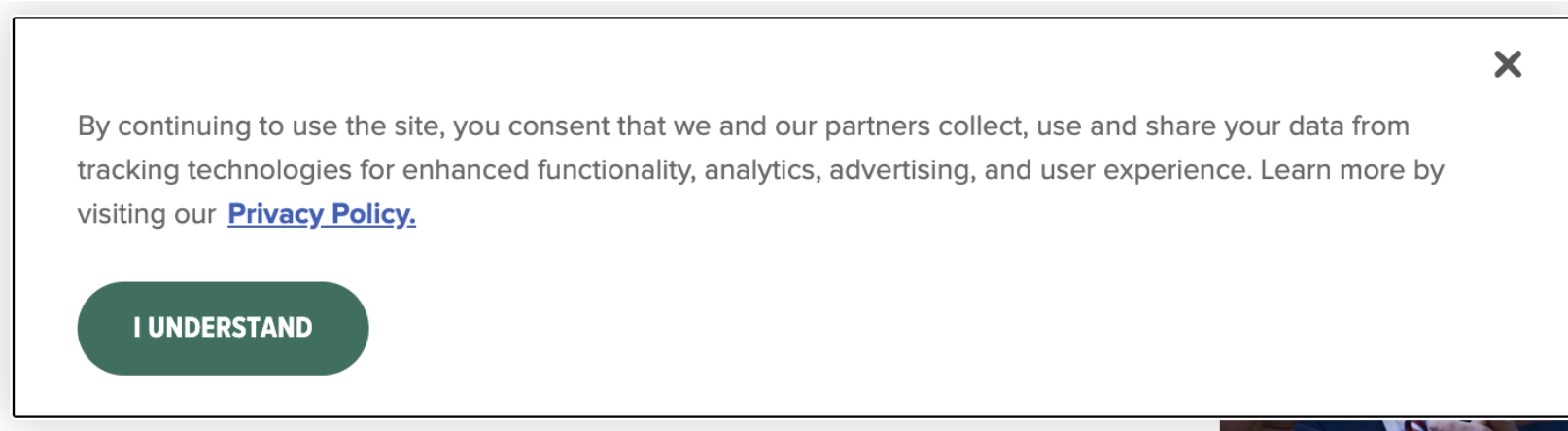
We've received your request.

Our website will no longer share information in a manner that constitutes a "sale" under California law, as described on our [Do Not Sell My Personal Information](#) page.

We will continue to share your information with our affiliates, service providers and other third parties for business purposes specified in our Privacy Policy or as otherwise permitted by law. For details, [see our Privacy Policy](#).

[Return to Homepage](#)

A Tale of Two Cookie Banners



Banner 1:

- Cookies only (does not address Do Not Sell)
- Does not allow you to reject
- Must use the DNS link at bottom of page to opt-out

This website uses cookies and other tracking technologies to enhance user experience and to analyze performance and traffic on our website. We also share information about your use of our site with our social media, advertising and analytics partners. If we have detected an opt-out preference signal then it will be honored. Further information is available in our [Privacy Policy](#)

[Do Not Sell or Share My Personal Information](#)

Reject All

Accept Cookies

Banner 2:

- Cookies + Do Not Sell
- Allows the user to reject all cookies
- Does include a DNS link, but the user may think that “Reject All” provides the same benefit

Banner 1

×

Do Not Sell or Share My Personal Information

When you visit this website, we collect personal information such as IP addresses, cookie identifiers and other pseudonymous identifiers. This information may be used to personalize content based on your interests and customize advertising campaigns tailored to you, measure the performance of our properties and derive insights about the audiences who engage with ads and content. Information may also be disclosed by us to third parties on IAB's List of Downstream Participants that may further disclose it to other third parties. Using personal information is an integral part of how we operate our website, make revenue to support our staff, and generate relevant content for our audience. You can learn more about our data collection and use practices in our Privacy Policy. If you wish to opt out of the disclosure of your personal information to third parties by us, please use the below opt out and confirm your selection. Please note that after your opt out request is processed, you may continue seeing interest-based ads based on personal Information utilized by us or personal information disclosed to third parties prior to your opt out. You may separately opt out of the further disclosure of your personal information by third parties on the IAB's List of Downstream Participants.

Manage Consent Preferences

+

Strictly Necessary Cookies

Always Active

+

Sale or Share of Personal Data

Confirm My Choices

Banner 2

×

Do Not Sell or Share My Personal Data

When you visit our website, we store cookies on your browser to collect information. The information collected might relate to you, your preferences or your device, and is mostly used to make the site work as you expect it to and to provide a more personalized web experience. However, you can choose not to allow certain types of cookies, which may impact your experience of the site and the services we are able to offer. Click on the different category headings to find out more and change our default settings according to your preference. You cannot opt-out of our First Party Strictly Necessary Cookies as they are deployed in order to ensure the proper functioning of our website (such as prompting the cookie banner and remembering your settings, to log into your account, to redirect you when you log out, etc.). For more information about the First and Third Party Cookies used please follow this link.

[More information](#)

Manage Consent Preferences

+

Strictly Necessary Cookies

Always Active

+

Performance Cookies

+

Functional Cookies

–

Allow Share Or Sale of Personal Data

Confirm My Choices



Do Not Sell or Share My Personal Data

When you visit our website, we store cookies on your browser to collect information. The information collected might relate to you, your preferences or your device, and is mostly used to make the site work as you expect it to and to provide a more personalized web experience. However, you can choose not to allow certain types of cookies, which may impact your experience of the site and the services we are able to offer. Click on the different category headings to find out more and change our default settings according to your preference. You cannot opt-out of our First Party Strictly Necessary Cookies as they are deployed in order to ensure the proper functioning of our website (such as prompting the cookie banner and remembering your settings, to log into your account, to redirect you when you log out, etc.). For more information about the First and Third Party Cookies used please follow this link.

[More information](#)

Manage Consent Preferences

+ Strictly Necessary Cookies	Always Active
+ Performance Cookies	☒
+ Functional Cookies	☒
- Allow Share Or Sale of Personal Data	☒

Confirm My Choices



information collected might relate to you, your preferences or your device, and is mostly used to make the site work as you expect it to and to provide a more personalized web experience. However, you can choose not to allow certain types of cookies, which may impact your experience of the site and the services we are able to offer. Click on the different category headings to find out more and change our default settings according to your preference. You cannot opt-out of our First Party Strictly Necessary Cookies as they are deployed in order to ensure the proper functioning of our website (such as prompting the cookie banner and remembering your settings, to log into your account, to redirect you when you log out, etc.). For more information about the First and Third Party Cookies used please follow this link.

[More information](#)

Allow All

Manage Consent Preferences

+ Strictly Necessary Cookies	Always Active
+ Performance Cookies	☒
+ Functional Cookies	☒
+ Allow Share Or Sale of Personal Data	☐

Confirm My Choices

Storage Preferences

When you visit websites, they may store or retrieve data about you using cookies and similar technologies ("cookies"). Cookies may be necessary for the basic functionality of the website as well as other purposes. You have the option of disabling certain types of cookies, though doing so may impact your experience on the website.

[Data Storage Policy](#) | [Google Privacy Policy](#)

Essential

Required to enable basic website functionality. You may not disable essential cookies.

[View Disclosures](#)

Targeted Advertising

Used to deliver advertising that is more relevant to you and your interests. May also be used to limit the number of times you see an advertisement and measure the effectiveness of advertising campaigns. Advertising networks usually place them with the website operator's permission.

[View Disclosures](#)

Personalization

Allow the website to remember choices you make (such as your username, language, or the region you are in) and provide enhanced, more personal features. For example, a website may provide you with local weather reports or traffic news by storing data about your general location.

[View Disclosures](#)

Analytics

Help the website operator understand how its website performs, how visitors interact with the site, and whether there may be technical issues.

[View Disclosures](#)

Do Not Sell or Share My Personal Information

By switching the toggle to the right and clicking save, you are indicating that you do not want us to sell your personal information or share your personal information for online targeted advertising activities. Please note if you use different computers or browsers, you must indicate your choices again on each computer or browser used to access our services.

Save

1. Cookie-Based Sales/Sharing Opt-Out

Do Not Sell or Share My Personal Information or Process for Targeting Advertising



If you are logged into your account, this setting will save your opt-out preference to your profile (otherwise your preference will be stored in a browser cookie). Please see the [full disclosure](#) below. Please note that if you have a legally-recognized browser-based opt-out preference signal turned on via your device browser (such as Global Privacy Control), we recognize such preference in accordance and to the extent required by applicable law.

Full disclosure: Unless you are logged into your account, your opt-out preferences will be stored in cookies and the above opt-out mechanism will be browser-based and device-specific; thus, you must opt-out on each device and on each browser to exercise your rights. If your browser blocks cookies, your opt-out preference may not be effective. If you delete cookies (or your browser is automatically set to do so), you may also be deleting your opt-out preference, so you should visit these pages periodically to review your preferences or to update your choices.

Allow Sale, Sharing, and Processing of My Personal Information for Targeted Advertising



If you switch this toggle off ("no") and save your choice, we will not sell or share your personal information from this service and this browser/device with third parties or otherwise process the information for the specific purpose of targeted advertising.

YOUR LOGO

Privacy Preference Center

General Description	
Essential Cookies	
First Party Performance and Functionality Cookies	
Third Party Performance and Functionality Cookies	
Advertising Cookies	Advertising Cookies These cookies collect information via the service in connection with "Advertisements" (as defined in our Terms of Use). "Advertising Companies" (as defined in our Privacy Statement) may also collect information via these cookies in connection with Advertisements. If you opt out of advertising cookies, you may still see Advertisements on the service but they will not be based on information collected from advertising cookies. "Marketing Providers" (also defined in the our Privacy Statement) may also collect information via advertising cookies in connection with marketing campaigns promoting the service or content, such as our ads on third party services. If you opt out of advertising cookies, you may still see marketing campaigns promoting the service or content, but they will not be based on information collected from these advertising cookies. Finally, ABC supports the self-regulatory Principles for Online Behavioral Advertising programs of the Digital Advertising Alliance (DAA), the Digital Advertising Alliance of Canada (DAAC), and the European Interactive Digital Advertising Alliance (EDAA).

Save settings

1. Cookie-Based Sales/Sharing Opt-Out

Do Not Sell or Share My Personal Information or Process for Targeting Advertising



✓ You have opted-out. If cookies are deleted, your opt-out preference will be deleted.

Allow Sale, Sharing, and Processing of My Personal Information for Targeted Advertising



If you switch this toggle off ("no") and save your choice, we will not sell or share your personal information from this service and this browser/device with third parties or otherwise process the information for the specific purpose of targeted advertising.

YOUR LOGO

Privacy Preference Center

General Description	
Essential Cookies	
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Advertising Cookies	Advertising Cookies These cookies collect information via the service in connection with "Advertisements" (as defined in our Terms of Use). "Advertising Companies" (as defined in our Privacy Statement) may also collect information via these cookies in connection with Advertisements. If you opt out of advertising cookies, you may still see Advertisements on the service but they will not be based on information collected from advertising cookies. "Marketing Providers" (also defined in the our Privacy Statement) may also collect information via advertising cookies in connection with marketing campaigns promoting the service or content, such as our ads on third party services. If you opt out of advertising cookies, you may still see marketing campaigns promoting the service or content, but they will not be based on information collected from these advertising cookies. Finally, ABC supports the self-regulatory Principles for Online Behavioral Advertising programs of the Digital Advertising Alliance (DAA), the Digital Advertising Alliance of Canada (DAAC), and the European Interactive Digital Advertising Alliance (EDAA).

Save settings

Research findings

We audited a stratified sample of 250/522 registered data brokers in 2025:

- 64% of sample had at least 1 feature increasing friction

Table 3. Weighted percentage of brokers registered in 2025 that utilize noncompliant or friction design features in the request submission process

Type	Feature	Description	% of Brokers
Noncompliance	Not all requests available	Broker does not provide a process to submit all privacy rights requests (Cal. Civ. Code § 1798.105 to § 1798.121)	43%
	Missing privacy policy	Broker website is missing a privacy policy (Cal. Civ. Code § 1798.99.85)	3%
	Excessive information	Broker requires searching or scrolling through information after clicking a submission request (Cal. Code Regs. Tit. 11, § 7004(a))	30%
	Verification required where unnecessary	Broker requires identify verification for requests that should not require it (request to opt out (Cal. Code Regs. § 7026(d)), or request to limit (Cal. Code Regs. § 7027(e))	37%
	Broken link(s)	Broker has invalid links to submissions and/or invalid email address or phone number (Cal. Code Regs. Tit. 11, § 7004(a))	10%
Increased Friction	CAPTCHA test	Broker requires solving a CAPTCHA test in any of the submissions	21%
	Separate / multiple forms	Broker requires that a consumer resubmit the same form multiple times or submit multiple forms, despite collecting the same information	43%
	Difficult to access or sensitive info required to submit	Broker asks for information in excess of email, name, address, or telephone, such as: Device ID, advertising ID, Social Security Number or other personal information	20%

Friction correlated with a lower number of requests

Table 5. Difference in means of identified noncompliance or friction features by the volume of requests received, where high and low reporting is split based on median request value.

	Lower Reporting (N = 125)		Higher Reporting (N = 125)		p-value
	Mean	SE	Mean	SE	
Average number of features identified	2.14	0.11	1.82	0.13	0.06
Not all requests available (%)	55	5.00	18	3.84	<0.001
Excessive or confusing information (%)	29	4.50	15	3.57	0.02
Verification required (%)	40	4.90	46	4.90	0.47
CAPTCHA test (%)	14	3.50	33	4.70	0.003
Separate forms (%)	48	5.00	36	4.80	0.12
Difficult to access or sensitive information (%)	15	3.60	24	4.27	0.15

Brokers reporting fewer requests had significantly fewer request types available and more excessive/confusing information

Brokers reporting higher requests deployed significantly more CAPTCHA tests – weaponizing?

Consistency: 60 Variants of CCPA “Do Not Sell” wording

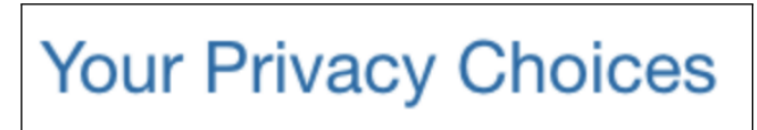
Source: A Bilingual Longitudinal Analysis of Privacy Policies Measuring the Impacts of the GDPR and the CCPA/CPRA Henry Hosseini, Christine Utz, Martin Degeling, and Thomas Hupperich. (PETS 2024).

Wording

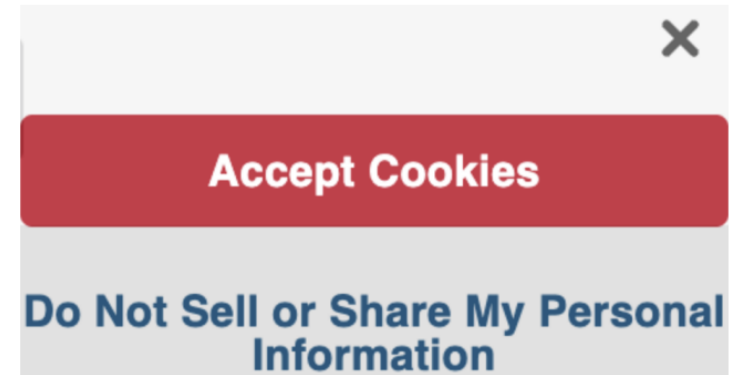
Do Not Sell My Personal Information
Do Not Sell or Share My Personal Information
Do Not Sell My Info
Do not sell my personal information
Do not sell my info
Do Not Sell or Share My Personal Data
CCPA: Do not sell my personal info
Do Not Sell My Personal Info
Do Not Sell My Information
Do not sell or share my personal information
Do Not Sell Or Share My Personal Information
Do not sell my data
Do Not Sell My Data
Do Not Sell or Share My Information
Do Not Sell Or Share My Information
Do not Sell or Share My Personal Information
Do not sell or share my info
Do Not Sell My Personal Data
CA - Do Not Sell My Info
Don't sell or share my personal information
Do Not Sell or Share My Info
DO NOT SELL PERSONAL INFORMATION
Do not sell my information
California Do Not Sell
Do Not Sell My PI
CA: Do Not Sell My Info
Do not Sell My Personal Info
DO NOT SELL OR SHARE MY INFORMATION
DO NOT SELL OR SHARE MY PERSONAL INFORMATION
Do Not Sell my Data
CA: Do Not Sell My Personal Info
Do not sell or share my personal data
Do Not Sell Or Share My Personal Info
CA Do Not Sell or Share My Information
California - Do Not Sell My Personal Information
California Do Not Sell My Personal Information
CA Do Not Sell My Info
Do Not Sell My Info (California)
CCPA Do Not Sell My Info
CA Do Not Sell My Personal Information
California Do Not Sell My Info
Do not Sell My Info
California: Do Not Sell My Info
Do Not Sell my Personal Info
Do Not Sell My Info (CA)
DO NOT SELL MY PERSONAL INFO
CCPA-Do Not Sell My Personal Information
DO NOT SELL MY PERSONAL INFORMATION
Do not sell my info (California)
Don't Sell My Personal Info
Do Not Sell My Personal Information (CCPA)
Don't sell my info
CCPA Do Not Sell My Personal Information
Do not sell my Info
Don't sell my data
Don't Sell My Info
CA: Do not sell my personal information
DO NOT SELL MY DATA
Do not sell my info (CA)
California Do Not Sell My Information



(a) Wording of the opt-out link is not up-to-date with the current CCPA.



(b) Opt-out link is correctly worded but lacks the opt-out icon, making it hard to locate amongst various links in the footer.



(c) The opt-out link is located in a popup and will disappear when a consumer closes the popup.

Figure 3: Examples of non-CCPA-compliant online opt-out methods.

Source: Tran et al. 2024. Measuring Compliance with the California Consumer Privacy Act Over Space and Time. CHI '24.

Dark Pattern Types Found in Opt-Out Requests

- 292 websites examined where opt-outs were successfully submitted
- 31.5% had no dark patterns
- 43.5% - at least one form of obstruction
- 35% - misdirection
- 20% - interface interference

High level	Dark pattern	#Websites
Obstruction	Identity confirmation	71 (24.3%)
	Privacy maze	56 (19.2%)
	Verified email message	41 (14.0%)
	Asymmetry	24 (8.2%)
	Separate submissions	17 (5.8%)
	CAPTCHA test	8 (2.7%)
	Other actions	6 (2.1%)
Interface interference	Information overload	41 (14.0%)
	Aesthetic manipulation	27 (9.2%)
Misdirection	Unclear request receipt	62 (21.2%)
	Cookie control misdirection	21 (9.2%)
	Confusing choices	19 (6.5%)

Table 6: Prevalence of each dark pattern across websites (N=292).

Ranking	Opt-out form	Toggle-based opt-outs	Both control methods
1	Identify confirmation (37.8%)	Cookie control misdirection (18.8%)	Privacy maze (43.4%)
2	Unclear request receipt (34.6%)	Asymmetry (14.3%)	Identity confirmation (37.7%)
3	Privacy maze (26.0%)	Information overload (13.4%)	Unclear request receipt (34.0%)
4	Verified email message (22.0%)	Confusing choices (12.5%)	Aesthetic manipulation (30.2%)
5	Information overload (13.4%)	Aesthetic manipulation (2.7%)	Verified email message (24.5%)

Table 7: Top 5 dark patterns present in each type of opt-out control method.

Source: Tran et al. 2025. Dark Patterns in the Opt-Out Process and Compliance with the California Consumer Privacy Act (CCPA). CHI '25.

Obstructive Dark Patterns in Rights Request Processes

Obstruction: Users encounter barriers or hurdles that make it difficult for them to complete a task or access information

Source: Tran et al. 2024. Measuring Compliance with the California Consumer Privacy Act Over Space and Time. CHI '24. ACM, New York, NY, USA, Article 785, 1–19.

(a) *Separate submissions:* Users can only opt out of either the sale or sharing of their personal information per request—not both. Website <https://www.finishline.com>.

(b) *Separate submissions:* Users must select each sports team individually under the parent website to complete the opt-out process. Website <https://www.nfl.com/>.

(c) *Identity confirmation:* Users must verify their identity within a timeframe. If they fail, they have to resubmit the request. Website <https://epson.com/usa>.

(d) *Asymmetry:* It only takes one click for users to opt-in (by clicking "Allow All") but it takes 2 clicks to opt-out (toggle off and select "Confirm My Choices"). Website <https://www.huffpost.com>.

(e) *Verified email message:* Users must solve a CAPTCHA and verify their identity via email to access a privacy portal. Website <https://www.nfl.com>.

Figure 7: Examples of some "Obstruction" dark patterns.

How do we prevent excessive friction in rights requests?

- Standardize the rights request process
 - Ideal: CalPrivacy develops a model set of templates for both forms and modal opt-outs, uses as ground truth for evaluation
 - Provide businesses with standardized language/terms and definitions for consumers
 - Require links back to CalPrivacy's consumer education portal for definitions/explanations
- Provide consumers with examples or tools to exercise their rights
 - Provide education for reporting request processes that appear to violate the law
- Update regulations to address the most egregious examples