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The 24th Privacy Enhancing Technologies Symposium, Bristol, UK

Generalizable Active Privacy Choice

Designing a Graphical User Interface for Global Privacy Control

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We have a problem with ...

Scientists built real-life “stillsuit” to recycle astronaut urine on

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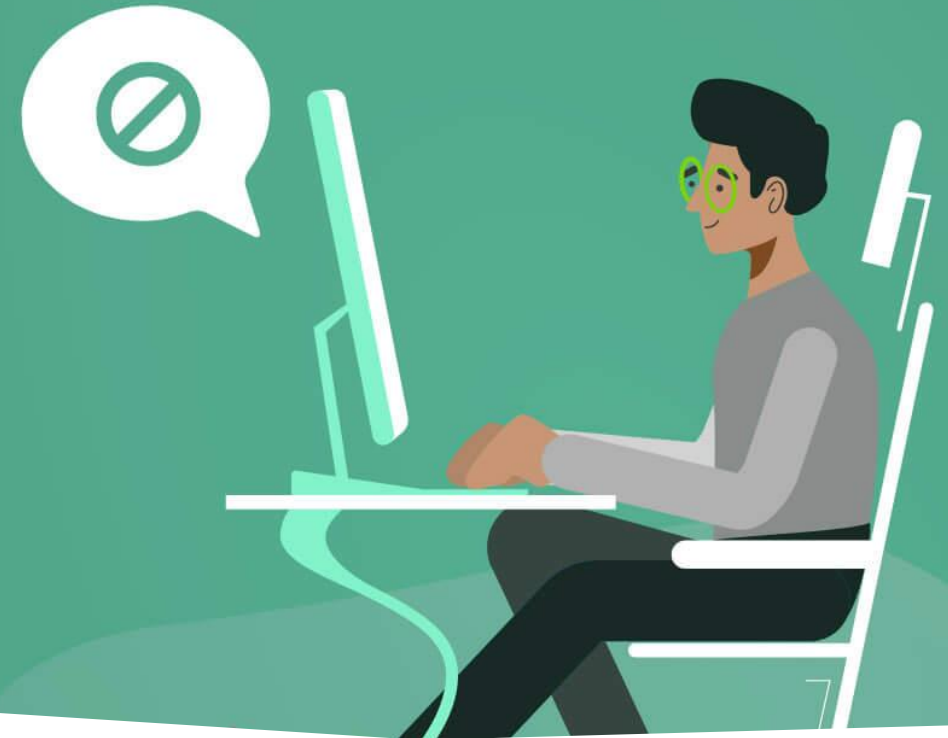


... opting out!

GPC: Global Privacy Control

Take Control Of Your Privacy

Exercising privacy rights more simply is critical to making online privacy accessible to all.



<https://globalprivacycontrol.org/>

GPC is Required by Law and Enforced by Regulators



Archive - Attorney General Becerra

@AGBecerra

#CCPA requires businesses to treat a user-enabled global privacy control as a legally valid consumer request to opt out of the sale of their data.

CCPA opened the door to developing a technical standard, like the GPC, which satisfies this legal requirement & protects privacy.

12:56 PM · Jan 28, 2021

23 Retweets 17 Quotes

Attorney General Bonta Announces Settlement with Sephora as Part of Ongoing Enforcement of California Consumer Privacy Act

Press Release - Attorney General Bonta Announces Settlement with Sephora as



Wednesday, August 24, 2022

Contact: (916) 210-6000, agpresso@doj.ca.gov

Marks strong second year of CCPA enforcement with update on enforcement efforts and new investigative sweep of businesses failing to process opt-out request via a user-enabled global privacy control

OAKLAND – California Attorney General Rob Bonta today announced a settlement with Sephora, Inc. (Sephora), resolving allegations that the company violated the California Consumer Privacy Act (CCPA), California's first-in-the-nation landmark privacy law. After conducting an enforcement sweep of online retailers, the Attorney General alleged that Sephora failed to disclose to consumers that it was selling their personal information, that it failed to process user requests to opt out of sale via user-enabled global privacy controls in violation of the CCPA, and that it did not cure these violations within the 30-day period currently allowed by the CCPA. Today's settlement is part of ongoing efforts by the Attorney General to enforce California's comprehensive consumer privacy law that allows consumers to tell businesses to stop selling their personal information to third parties, including those signaled by the Global Privacy Control (GPC).

Universal Opt-Out Shortlist

The **Colorado Privacy Act (CPA)** contains express Consumer rights, including Personal Data for Targeted Advertising. Beginning on July 1, 2024, organizations must provide a mechanism for Consumers to opt out of the sale or use of their Personal Data for Targeted Advertising.

To ensure that Consumers and Controllers know which UOOMs will be enforced, the Department will publish a list of Universal Opt-Out Mechanisms that have been recognized to meet the standard. This list shall be updated periodically."

The Colorado Department of Law (The Department) accepted applications for consideration (the "shortlist"). The Department accepted public comment on the shortlist. The Department considered public comments alongside each application and the comment can be found [here](#).

The below list of UOOMs includes those The Department considers valid and authorized implementations meet the requirements of C.R.S. § 6-1-1313 and each UOOM to ensure they are able to accept Consumer requests.

Universal Opt-Out Mechanism

Technical Specification

Global Privacy Control (GPC)

[Privacy CG](#)

GPC Adoption

Browsers and Extensions



Consent Management Platforms



Publishers, Retailers, Companies



Check if a site supports GPC
at <https://gpsup.com/>

The Default Problem

- Legal requirement: No default settings*
- Problem: Usability
- Solution: Activity + Generalizability



Site A
Opt Out ☒



Site B
Opt Out ☒



Site C
Opt Out ☒



Site D
Opt Out ☒



* E.g., CCPA Section 1798.185(a)(19)(A)(iii), Colorado Privacy Act Section 6-1-1313(2)(c), Connecticut Data Privacy Act Section 6(e)(1)(A)(ii)(II).

Privacy Choice Schemes

Generalize a privacy choice, for example,

- from one website to multiple sites (banner schemes)
- via categories of sites to which a choice applies (category schemes)

Global Privacy Control (GPC)

The law gives you a privacy right:

Enable GPC to **prohibit** this website from selling/sharing your data.

Disable GPC to **permit** this website to sell/share your data.

ENABLE GPC

DISABLE GPC

☐ Apply to all websites you visit

[Review or modify your settings](#)

The law gives you a privacy right:

Select one or more categories to specify which websites should be prohibited from selling/sharing your data. Hover over the cards to learn more.

Advertising

Analytics

Content & Social

Cryptomining

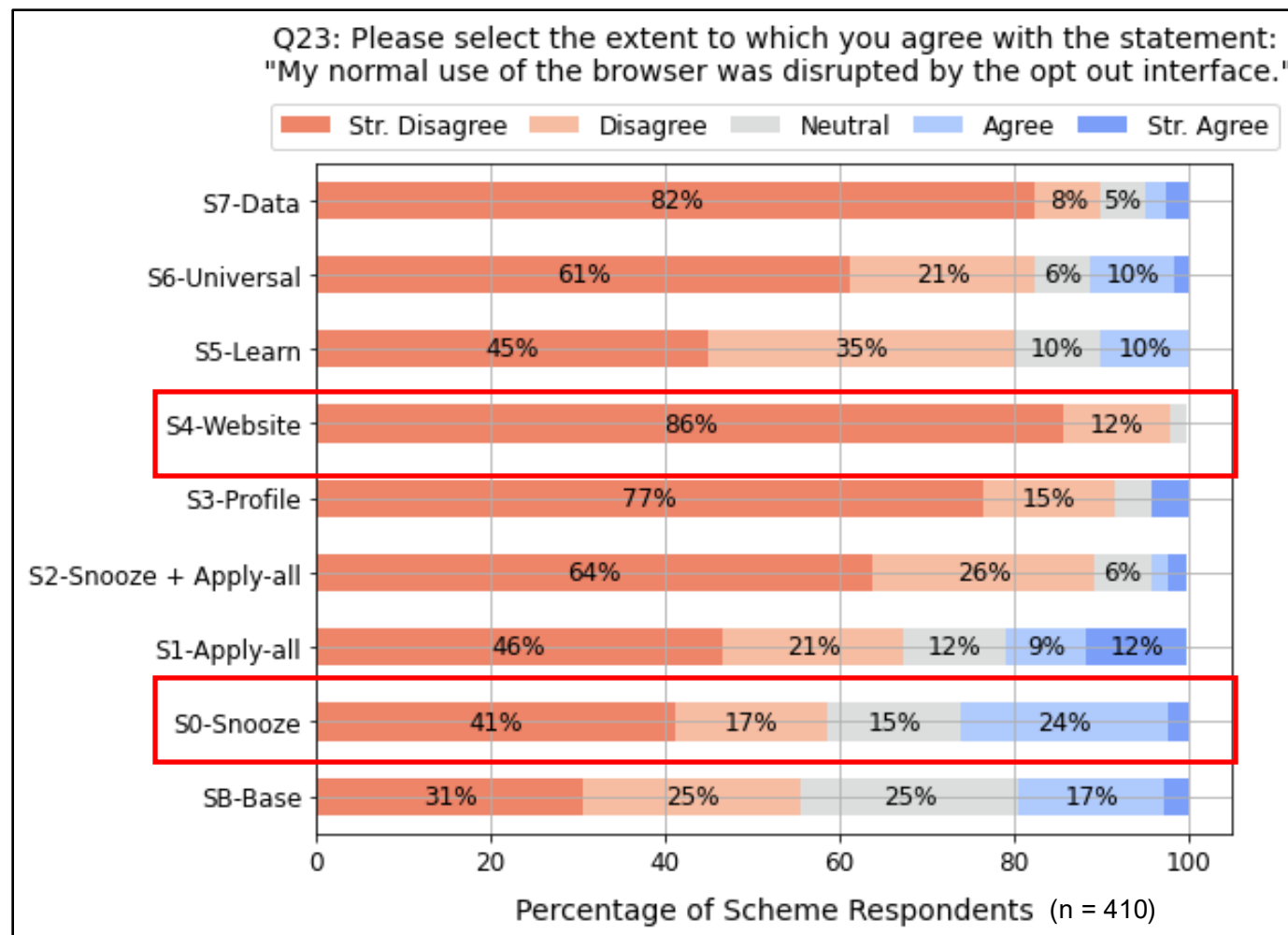
Browser Fingerprinting

All Sites

Generalizable Active Privacy Choice

- Activity
- Generalizability
- In the context of GPC but many other use cases exist e.g., cookie banners





The **perceived level of disruption is lower** for schemes with generalizability features than for baseline schemes and, in a less pronounced trend, for banner schemes overall. **For the least disruptive scheme — S4-Website — 98% participants reported that they did not feel disrupted**, a 40% point increase over baseline scheme S0-Snooze.

Main Findings

Generalizability features:

- Decrease opt out utility slightly
- Increase opt out efficiency substantially
- Make opting out less disruptive

which was very important to most study participants



Recommendations

1. Regulators Should Require Publishers to Honor GPC Signals
2. Browser Vendors Should Integrate GPC in their Browsers via a Generalizable Active Privacy Choice Interface*
3. Publishers Should Honor Opt Outs via GPC



* No Interface also works for privacy-preserving products (e.g., the Brave browser).

Thank You!



ALFRED P. SLOAN
FOUNDATION



Wesleyan University



<https://privacytechlab.org>



At Exley Science Center
from left to right: Eliza
Kuller, Sebastian Zimmeck,
Chunyue Ma, Bella
Tassone, Joe Champeau

Paper: <https://petsymposium.org/popets/2024/popets-2024-0015.pdf>

GitHub Repo: <https://github.com/privacy-tech-lab/gpc-privacy-choice>

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