

## APPENDIX

### CCPA Enforcement Actions: Evolution in Enforcement Theory

*From Privacy Choice Presence to Effectiveness*

All seven enforcement settlements brought by Attorney General Rob Bonta under the California Consumer Privacy Act (CCPA) reflect an evolution in enforcement theory. Earlier actions focused primarily on whether opt-out mechanisms and disclosures existed at all, while later settlements evaluated whether consumer privacy choices were implemented effectively across systems, signaling the California Attorney General's shift from interface-level compliance to operational accountability.

#	ENTITY	DATE	PENALTY	HOLDING / KEY VIOLATIONS
1	<b>Sephora</b> <i>Retail/Beauty</i> <b>Sephora Settlement</b>	Aug. 2022	<b>\$1.2M</b>	Failed to disclose sale of consumer personal information; failed to process opt-out requests via Global Privacy Control (GPC); did not cure violations within 30-day period. Sharing data with third parties for analytics/advertising constituted a "sale" under the CCPA.
2	<b>DoorDash</b> <i>Food Delivery</i> <b>DoorDash Settlement</b>	Feb. 2024	<b>\$375K</b>	Sold consumer personal information to marketing cooperatives without notice or opt-out opportunity. Sharing data with a marketing co-op for "other valuable consideration" constituted a sale under the CCPA. Also violated California Online Privacy Protection Act disclosure requirements.
3	<b>Tilting Point Media</b> <i>Entertainment/Gaming</i> <b>Tilting Point Media Settlement</b>	June 2024	<b>\$500K</b>	Collected and shared children's data without parental consent in "SpongeBob: Krusty Cook-Off." Used non-neutral age screen (defaulting to birth year 1953); misconfigured third-party SDKs. First CCPA children's data action. Also violated federal <b>Children's Online Privacy Protection Act</b> .
4	<b>Healthline.com</b> <i>Website Publisher/Health</i> <b>Healthline.com Settlement</b>	July 2025	<b>\$1.55M</b>	Failed to honor consumer opt-outs for targeted advertising; a misconfigured opt-out mechanism continued transmitting data. Shared article titles revealing potential medical diagnoses with ad-tech vendors, violating CCPA's purpose limitation principle. Advertising contracts lacked required terms.
5	<b>Sling TV</b> <i>Streaming Service</i> <b>Sling TV Settlement</b>	Oct. 2025	<b>\$530K</b>	First action from the CA Department of Justice's streaming services sweep. Used deceptive, hard-to-find opt-out methods; combined CCPA opt-out with cookie preferences; required resubmission of known information. Failed to provide in-app opt-out on connected TV devices. Lacked children's privacy protections.

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6	<b>Jam City</b> <i>Mobile App</i> <i>Gaming</i> Jam City Settlement	Nov. 2025	<b>\$1.4M</b>	Sold/shared consumer data across 21 mobile gaming apps without providing any CCPA-compliant opt-out mechanism. 20 of 21 apps had zero opt-out controls. Misconfigured age gates resulted in selling/sharing data of consumers ages 13–15 without required affirmative consent.
7	<b>The Walt Disney Co.</b> <i>Entertainment/</i> <i>Streaming</i> Disney Settlement	Feb. 2026	<b>\$2.75M</b>	Largest CCPA settlement to date. Second action from streaming sweep. Failed to fully effectuate opt-out requests across all devices and streaming services linked to a consumer's account. In-app toggles limited to single service/device; GPC signals honored only on originating device rather than account-wide.

### **INVESTIGATIVE SWEEPS**

To monitor business compliance with the CCPA, Attorney General Bonta has conducted investigative sweeps related to the following topics: location data, streaming apps and devices, employee information, and surveillance pricing.

**Source:** **California Office of the Attorney General Press Release (Feb. 11, 2026)** *and individual settlement announcements.*