

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	Sephora <i>Retail/Beauty</i> Sephora Settlement	Aug. 2022	\$1.2M	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	DoorDash <i>Food Delivery</i> DoorDash Settlement	Feb. 2024	\$375K	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	Tilting Point Media <i>Entertainment/</i> <i>Gaming</i> Tilting Point Media Settlement	June 2024	\$500K	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 Children’s Online Privacy Protection Act .
4	Healthline.com <i>Website</i> <i>Publisher/</i> <i>Health</i> Healthline.com Settlement	July 2025	\$1.55M	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	Sling TV <i>Streaming Service</i> Sling TV Settlement	Oct. 2025	\$530K	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	Jam City <i>Mobile App</i> <i>Gaming</i> Jam City Settlement	Nov. 2025	\$1.4M	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	The Walt Disney Co. <i>Entertainment/</i> <i>Streaming</i> Disney Settlement	Feb. 2026	\$2.75M	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](#).