

[privacy@wikimedia.org](mailto:privacy@wikimedia.org)

Dear Madam and/or Sir,

We are contacting you because you are listed in the imprint of the following website as the designated responsible party for Wikipedia.

During our research project, we identified practices on your website that may not fully comply with the EU General Data Protection Regulation (GDPR) concerning users' rights to withdraw consent. Specifically, your website does not provide a direct method to withdraw consent. Your practice would lead to the following **potential** legal violations:

- Right to revoke consent: users have the right to revoke consent at any time (Art. 7(3), Recital 42) of the GDPR, and thus websites are obliged to facilitate the exercise of this right (Art. 12(2) GDPR) by providing a consent revocation option. The absence of revocation options renders consent invalid ( Art. 4(11) GDPR ) and any data processed henceforth is processed illegally, without a legal basis (Art. 6(1)(a) GDPR);
- Easy revocation through the same effort and number of steps;
- Fairness: websites must not process personal data in an unjustifiably detrimental, discriminatory, unexpected or misleading way (Art. 5(1)(a) GDPR);
- Data protection by design: websites must implement technical and organizational measures, and safeguards efficiently to enable the exercise of the revocation right (Art. 25(1) GDPR)
- Accountability: websites must be able to demonstrate that revocation is effective, i.e., performed easily and effectively (Arts. 5(2), 24(1) GDPR).

The supervisory authorities can impose fines in case of violations of data protection law. These fines must be effective, proportionate and dissuasive in each individual case (cf. Art. 83 (1) GDPR). In the event of infringements of the principles governing processing of personal data and data subject rights, fines can be issued up to 20 million euros or, in the case of a company, up to 4% of the total annual worldwide turnover achieved in the previous financial year, whichever is the higher, may be imposed (Art. 83 para. 5(a),(b) GDPR).

For full details about our findings and potential legal violations, please refer to the sections 4.1 and 4.2 of our paper available here: <https://doi.org/10.48550/arXiv.2411.15414> .

Should you need further information or have any other questions, please do not hesitate to contact us using the same email address.

Sincerely,  
 Cristiana Santos  
 School of Law of Utrecht University  
 Email address: [c.teixeirasantos@uu.nl](mailto:c.teixeirasantos@uu.nl)

[privacy@discord.com](mailto:privacy@discord.com)

Dear Madam and/or Sir,

We are contacting you because you are listed in the imprint of the following website as the designated responsible party for Discord.

During our research project, we identified practices on your website that may not fully comply with the EU General Data Protection Regulation (GDPR) concerning users' rights to withdraw consent. Specifically, your website does not provide a direct method to withdraw consent. Your practice would lead to the following **potential** legal violations:

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[privacy@github.com](mailto:privacy@github.com)

Dear Madam and/or Sir,

We are contacting you because you are listed in the imprint of the following website as the designated responsible party for Github.io .

During our research project, we identified practices on your website that may not fully comply with the EU General Data Protection Regulation (GDPR) concerning users' rights to withdraw consent. Specifically, your website does not provide a direct method to withdraw consent. Your practice would lead to the following **potential** legal violations:

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[privacy@medium.com](mailto:privacy@medium.com)

Dear Madam and/or Sir,

We are contacting you because you are listed in the imprint of the following website as the designated responsible party for Medium.

During our research project, we identified practices on your website that may not fully comply with the EU General Data Protection Regulation (GDPR) concerning users' rights to withdraw consent. Specifically, your website does not provide a direct method to withdraw consent. Your practice would lead to the following **potential** legal violations:

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[sfnet\\_ops@slashdotmedia.com](mailto:sfnet_ops@slashdotmedia.com) , [security@sourceforge.net](mailto:security@sourceforge.net)

Dear Madam and/or Sir,

We are contacting you because you are listed in the imprint of the following website as the designated responsible party for Sourceforge.

During our research project, we identified practices on your website that may not fully comply with the EU General Data Protection Regulation (GDPR) concerning users' rights to withdraw consent. Specifically, your website registers a "positive consent" even after the user has withdrawn consent. Your practice would lead to the following **potential** legal violations:

- Correct registration of consent revocation: This requirement demands that websites must correctly register the user consent revocation decision, and assure that the decision made by the user in the banner interface is identical to the consent that gets registered/stored by the website (Arts. 7(1), 30, Rec. 42 of GDPR). A violation occurs when a registered consent is different from the user's choice.
- Data protection by design: Websites must implement technical and organisational measures, and safeguards efficiently to enable the exercise of the revocation right (Art. 25(1) of GDPR).

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[privacy.officer@ft.com](mailto:privacy.officer@ft.com)

Dear Madam and/or Sir,

We are contacting you because you are listed in the imprint of the following website as the designated responsible party for Financial Times.

During our research project, we identified practices on your website that may not fully comply with the EU General Data Protection Regulation (GDPR) concerning users' rights to withdraw consent. Specifically, your website registers a "positive consent" even after the user has withdrawn consent. Your practice would lead to the following **potential** legal violations:

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Email address: [c.teixeirasantos@uu.nl](mailto:c.teixeirasantos@uu.nl)



[LegalNotices@Gannett.com](mailto:LegalNotices@Gannett.com)

Dear Madam and/or Sir,

We are contacting you because you are listed in the imprint of the following website as the designated responsible party for Freep.

During our research project, we identified practices on your website that may not fully comply with the EU General Data Protection Regulation (GDPR) concerning users' rights to withdraw consent. Specifically, your website has "Inconsistency among consent strings between browser storage and APIs". These include websites implementing IAB TCF where the TCString found in the browser storage (cookies and localStorage) is not consistent with the TCString returned by the TCF API. Your practice would lead to the following **potential** legal violations:

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[PrivacyPolicyCoordinator@bizjournals.com](mailto:PrivacyPolicyCoordinator@bizjournals.com)

Dear Madam and/or Sir,

We are contacting you because you are listed in the imprint of the following website as the designated responsible party for PortFolio.

During our research project, we identified practices on your website that may not fully comply with the EU General Data Protection Regulation (GDPR) concerning users' rights to withdraw consent. Specifically, your website has "Inconsistency among consent strings between browser storage and APIs". These include websites implementing IAB TCF where the TCString found in the browser storage (cookies and localStorage) is not consistent with the TCString returned by the TCF API. Your practice would lead to the following **potential** legal violations:

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[privacy.issues@thomsonreuters.com](mailto:privacy.issues@thomsonreuters.com)

Dear Madam and/or Sir,

We are contacting you because you are listed in the imprint of the following website as the designated responsible party for Reuters.

During our research project, we identified practices on your website that may not fully comply with the EU General Data Protection Regulation (GDPR) concerning users' rights to withdraw consent. Specifically, your website has "Inconsistency among consent strings between browser storage and APIs". These include websites implementing IAB TCF where the TCString found in the browser storage (cookies and localStorage) is not consistent with the TCString returned by the TCF API. Your practice would lead to the following **potential** legal violations:

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[dataprotection@reachplc.com](mailto:dataprotection@reachplc.com)

Dear Madam and/or Sir,

We are contacting you because you are listed in the imprint of the following website as the designated responsible party for Manchester Evening News.

During our research project, we identified practices on your website that may not fully comply with the EU General Data Protection Regulation (GDPR) concerning users' rights to withdraw consent. Specifically, your website has "Inconsistency among consent strings between browser storage and APIs". These include websites implementing IAB TCF where the TCString found in the browser storage (cookies and localStorage) is not consistent with the TCString returned by the TCF API. Your practice would lead to the following **potential** legal violations:

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[privacy@forbes.com](mailto:privacy@forbes.com)

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[privacy@time.com](mailto:privacy@time.com)

Dear Madam and/or Sir,

We are contacting you because you are listed in the imprint of the following website as the designated responsible party for Time.

During our research project, we identified practices on your website that may not fully comply with the EU General Data Protection Regulation (GDPR) concerning users' rights to withdraw consent. Specifically, your website has "Inconsistency between consent returned via TCF API and consent shared on the network". Your practice would lead to the following **potential** legal violations:

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[datenschutz@ntv.de](mailto:datenschutz@ntv.de)

Dear Madam and/or Sir,

We are contacting you because you are listed in the imprint of the following website as the designated responsible party for NTV.

During our research project, we identified practices on your website that may not fully comply with the EU General Data Protection Regulation (GDPR) concerning users' rights to withdraw consent. Specifically, your website has "Inconsistency between consent returned via TCF API and consent shared on the network". Your practice would lead to the following **potential** legal violations:

- Correct registration of consent revocation: This requirement demands that websites must correctly register the user consent revocation decision, and assure that the decision made by the user in the banner interface is identical to the consent that gets registered/stored by the website (Arts. 7(1), 30, Rec. 42 of GDPR). A violation occurs when a registered consent is different from the user's choice.
- Data protection by design: Websites must implement technical and organisational measures, and safeguards efficiently to enable the exercise of the revocation right (Art. 25(1) of GDPR).

The supervisory authorities can impose fines in case of violations of data protection law. These fines must be effective, proportionate and dissuasive in each individual case (cf. Art. 83 (1) GDPR). In the event of infringements of the principles governing processing of personal data and data subject rights, fines can be issued up to 20 million euros or, in the case of a company, up to 4% of the total annual worldwide turnover achieved in the previous financial year, whichever is the higher, may be imposed (Art. 83 para. 5(a),(b) GDPR).

For full details about our findings and potential legal violations, please refer to the sections 4.1 and 4.2 of our paper available here: <https://doi.org/10.48550/arXiv.2411.15414>.

Should you need further information or have any other questions, please do not hesitate to contact us using the same email address.

Sincerely,  
Cristiana Santos  
School of Law of Utrecht University  
Email address: [c.teixeirasantos@uu.nl](mailto:c.teixeirasantos@uu.nl)



[dpo@prisa.com](mailto:dpo@prisa.com)

Dear Madam and/or Sir,

We are contacting you because you are listed in the imprint of the following website as the designated responsible party for Cadenaser.

During our research project, we identified practices on your website that may not fully comply with the EU General Data Protection Regulation (GDPR) concerning users' rights to withdraw consent. Specifically, your website has "Inconsistency between consent returned via TCF API and consent shared on the network". Your practice would lead to the following **potential** legal violations:

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Sincerely,  
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School of Law of Utrecht University  
Email address: [c.teixeirasantos@uu.nl](mailto:c.teixeirasantos@uu.nl)

[PrivacyDirector@pmc.com](mailto:PrivacyDirector@pmc.com)

Dear Madam and/or Sir,

We are contacting you because you are listed in the imprint of the following website as the designated responsible party for Deadline.

During our research project, we identified practices on your website that may not fully comply with the EU General Data Protection Regulation (GDPR) concerning users' rights to withdraw consent. Specifically, your website has "Inconsistency between consent returned via TCF API and consent shared on the network". Your practice would lead to the following **potential** legal violations:

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[privacy@g-omedia.com](mailto:privacy@g-omedia.com)

Dear Madam and/or Sir,

We are contacting you because you are listed in the imprint of the following website as the designated responsible party for Kotaku.

During our research project, we identified practices on your website that may not fully comply with the EU General Data Protection Regulation (GDPR) concerning users' rights to withdraw consent. Specifically, your website has "Inconsistency between consent returned via TCF API and consent shared on the network". Your practice would lead to the following **potential** legal violations:

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[dataprotection@reachplc.com](mailto:dataprotection@reachplc.com)

Dear Madam and/or Sir,

We are contacting you because you are listed in the imprint of the following website as the designated responsible party for Wales Online.

During our research project, we identified practices on your website that may not fully comply with the EU General Data Protection Regulation (GDPR) concerning users' rights to withdraw consent. Specifically, your website has "Inconsistency between consent returned via TCF API and consent shared on the network". Your practice would lead to the following **potential** legal violations:

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