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CONSENT FRAGMENTATION: THE CROSS-CHANNEL OPT-OUT COMPLIANCE CHALLENGE

Thursday, 8 October 2026 · 11:30–12:30 PDT · Seattle



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MEET THE PANEL



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HOW WE'LL SPEND THE HOUR

- I. Welcome and introductions
- II. Where enforcement and guidance stand today
- III. What unified consent management looks like day to day
- IV. Scoping and unifying across web, app, email, SMS and CTV
- V. Identity: following the user across your ecosystem
- VI. Building a program that scales
- VII. Futureproofing: scaling for success
- VIII. Questions and answers



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THE BAR HAS BEEN SET

“If a business can associate a consumer’s devices with the consumer for advertising purposes, it can and must associate those devices with the consumer for purposes of honoring the consumer’s opt-out rights.”

California Attorney General, Disney CCPA settlement, February 2026

If you can find the user to sell them something, regulators expect you to find them to honor their choice.

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ENFORCEMENT AND GUIDANCE TODAY

Disney / California AG

February 2026

- \$2.75M settlement, the largest CCPA penalty to date
- Opt-outs had to be made device by device and service by service
- TV streaming apps offered no in-app opt-out, only a web redirect
- Opt-outs not passed through to ad partners

CNIL multi-device

Adopted Dec 2025, published Jan 2026

- Consent given on one device may carry to others only via a logged-in account
- Refusal and withdrawal must travel the same way as consent
- Notify the user when account choices are applied on a new device
- Pseudonymize account identifiers shared with vendors

California DROP

Live Jan 2026, brokers must act from Aug 2026

- Centralized deletion and opt-out platform run by the CPPA
- Data brokers must check DROP every 45 days and act on requests
- Signals that consumer choices are becoming centralized and standardized
- Requires infrastructure connecting intake, execution and proof



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WHY IS THIS STILL SO HARD?

1

Why is this a problem?

A consumer opts out on the website. Does the app, the email program, the SMS list and the CTV app know?

2

What are the challenges?

Different vendors, different identifiers, different teams, and no single source of truth for a person's choices.

3

Why does it matter to consumers?

A choice that only half-works is worse than no choice: it erodes trust and invites complaints.

4

What does volume look like right now?

Opt-out and preference signals are growing across GPC, in-app settings, email and now centralized platforms.



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UNIFYING ACROSS CHANNELS

Web

Mobile app

Email

SMS

Connected TV

One person, multitude of channels, and many different ways to say no.

Connecting the channels

How have you gone about linking web opt-outs to app, email, SMS and CTV? Where did it break first?

Evaluating your stack

Which of your tools can actually receive, store and honor a preference signal, and which just display a banner?

Where CTV fits

Streaming apps are where Disney fell down. What does a real in-app opt-out on a TV look like?



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IDENTITY ACROSS YOUR ECOSYSTEM

The logged-in universe

Consent follows the account, not the device.

When a user is authenticated, their choices can be stored once and applied everywhere they log in. That is the model CNIL now endorses and the standard the California AG held Disney to.

The hard part is the rest: unauthenticated visitors, shared devices, and the identifiers your ad partners use.

Locating the user

Which identifiers tie a person together across your properties, and who owns that graph?

Syncing preferences

How do choices move between authenticated environments and downstream vendors, and how fast?

Adtech identity

Hashed emails, device IDs and clean rooms: where does the opt-out have to reach, and where does it stop?



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BUILDING A PROGRAM THAT SCALES

1

Scope it

Inventory every channel, vendor and identifier that touches a consumer choice. Decide whether identity is in or out of scope.

2

Staff it

Privacy, product, marketing, data and engineering each own a piece. Name the one owner who is accountable for the whole.

3

Fund it

Size the investment against the business goals it serves: relevance, engagement and fewer complaints, not just avoided fines.

4

Prove it

Log the choice, the propagation and the outcome, so you can show a regulator the signal made it all the way through.

Discussion: what level of investment is realistic, and how do you align it with what the organization is trying to do?



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TWO YEARS OUT

Regulatory horizon

More enforcement built on the Disney template, more guidance in the CNIL mold, and centralized choice platforms beyond DROP.

New channels

Every new surface (in-car, gaming, wearables, retail media) is another place a preference has to reach.

AI

Agents acting for consumers will exercise rights at scale, and agents inside companies will have to honor them everywhere.

Lightning round: one prediction each, thirty seconds.



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WHAT TO TAKE BACK TO YOUR TEAM

- 1 Existing consent management platforms often fail to propagate opt-outs across web, mobile, email and CTV. Architect around the logged-in universe so the choice follows the account.
- 2 Enforcement is setting expectations for cross-channel preference compliance. Benchmark how peers are adapting and be ready to show your work.
- 3 Align product, marketing and compliance on unified preference management. Done well, it enables relevant content and stronger engagement, not just compliance.



QUESTIONS?

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RESOURCE LIST

- California AG press release and settlement: People v. The Walt Disney Company (CCPA, February 2026)
- CNIL, Recommendation on multi-device (multi-terminal) consent (adopted December 2025)
- California Privacy Protection Agency, Delete Request and Opt-out Platform (DROP): privacy.ca.gov
- Global Privacy Control specification: globalprivacycontrol.org
- **Panel contacts**
 - Tyler Finn · Amanda Moore · Ramsey Kail · Maneesha Mithal



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How Did Things Go? (We Really Want To Know)

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Thank you!

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