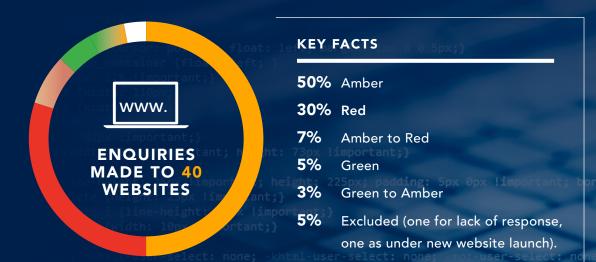
MAYER BROWN

Snapshot of the Irish Data Protection Commission Report on the Use of Cookies (April 6, 2020)



www. 34 WEBSITES (OUT OF 38)

USE 1/3 PARTY

COOKIES

KEY TAKE AWAY

transform: rotate(180deg):tra

Websites need to include a tool for easy withdrawal of consent, at any time.

Consent Management Tools to be audited and ensure that they: (i) are properly set up (avoiding bad accessibility or nudging design), (ii) are doing what they say (i.e., not placing cookies that are not accepted by users), (iii) include all cookies (including pixels and SDKs).

More enforcement actions expected as from the fall.

2/3 R D OF THE WEBSITES STILL RELY ON IMPLIED CONSENT FOR COOKIES

40%

26% OF THE WEBSITES STILL APPLY PRE-TICKED BOXES

15 websites out of 38 (or 40%) acknowledged to

the Irish Data Protection

Authority that they knew

they were not in compliance

with ePrivacy and GDPR.

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