

# Data Rights Protocol

A technical standard for exchanging data rights requests,  
incubated at Consumer Reports Innovation Lab

Ryan Rix – DRP Technical Lead



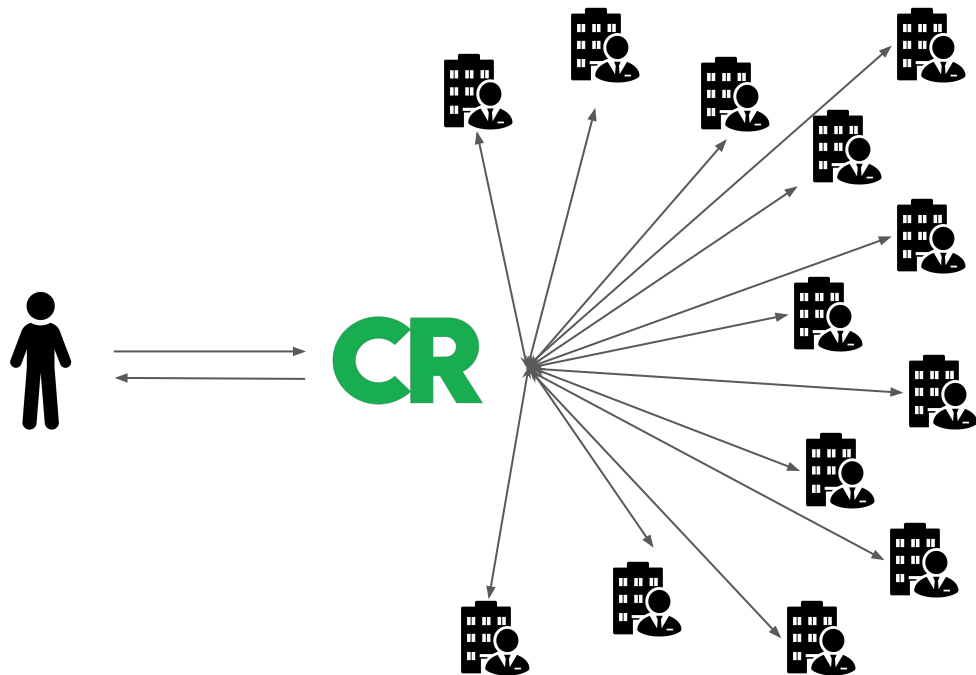
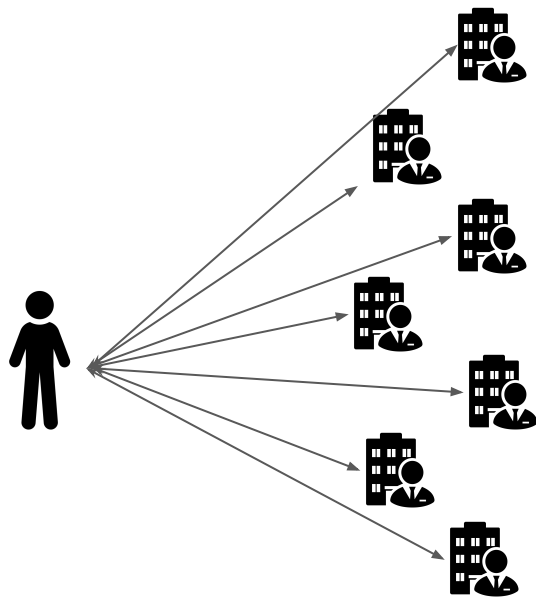
# When Consumers Tried to Opt Themselves Out

- **About 46% of the time, consumers were left waiting or unsure** about the status of their DNS request.
- About **52% of the time, the tester was “somewhat dissatisfied” or “very dissatisfied”** with the opt-out processes.
- For **42.5% of sites tested, at least one of three testers was unable to find a DNS link**. All three testers failed to find a “Do Not Sell” link on 12.6% of sites.
- **add[ed] to a marketing list**
- **required to set up an account** to opt out



[Are Consumers' Digital Rights Protected?](#)

# A model for improving access to data rights



# When Consumer Reports Opted Consumers Out



- **3 of 21 companies (14%) did not provide confirmation that all of the opt outs had been processed.**
- **1 of 21 companies (5%) requested non-standard information** that we had not collected from consumers.
- **12 of 21 companies (57%) ultimately confirmed that they stopped the sale** of at least some data in response to all of the opt-out submissions

# When Consumer Reports Submitted DSAR Requests

- Verifying consumer identity was difficult and confusing
- Some data seemed fishy to consumers
- Some companies weren't fully prepared to serve consumer data rights or work with Agents

Fulfilled	51
Denied	38
Not fulfilled	8
Unknown	111
Total	208



[Findings from helping 104 consumers access their own data from companies](#)

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# CR's Permission Slip is Building Tools for Consumers

November 16, 2022

Introducing Permission Slip, the App to Take Back Control of your Data



- Consumer Reports decided to build an agent app
- Users see a stack of cards explaining companies' data practices **informed by Privacy Policies and results of prior requests**
- Currently driven by back of house, largely un-automated process
- **How do we scale up to build something more consumers can take advantage of?**

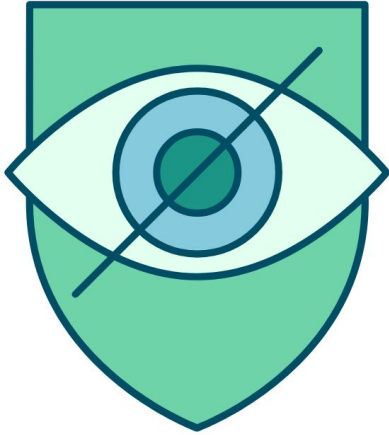
✨ Automation ✨

[Introducing Permission Slip, the App to Take Back Control of your Data](#)

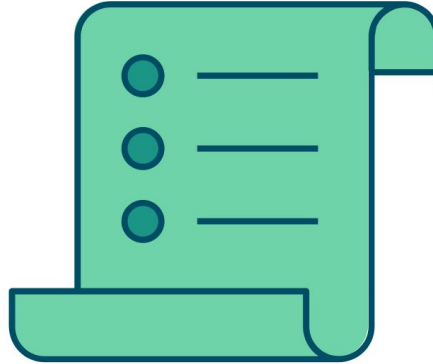
# The birth of the Data Rights Protocol

- Consumers want to exercise their data rights, how can we streamline this process?
- Lack of strong verified digital identity limits businesses' ability to respond to data rights requests
- Lack of consistent interface to requesting and tracking data rights hampers consumers' ability to exercise these rights
- Authorized Agents are an opportunity to solve both issues at once
- The DRP is an organization of Authorized Agents, Privacy Compliance Tooling providers, and businesses to **standardize and streamline the interchange of data rights requests.**

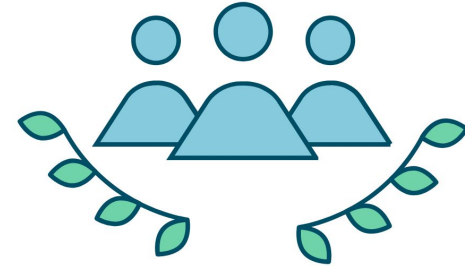
**The goal is to deploy a holistic Data Rights System in three dimensions:**



**Technical protocol**



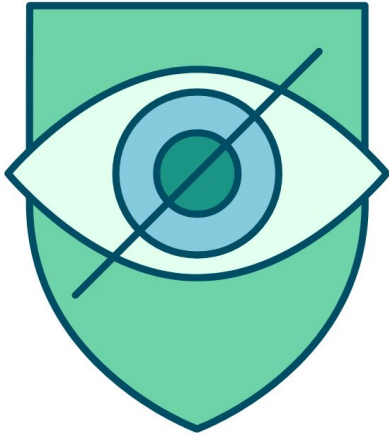
**Operating rules**



**Participatory network**

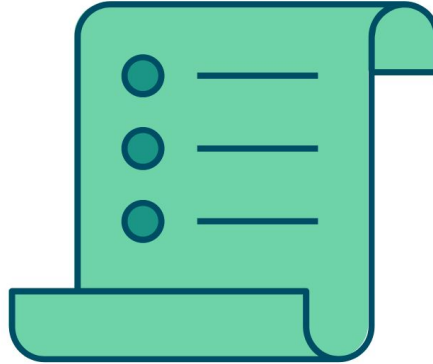


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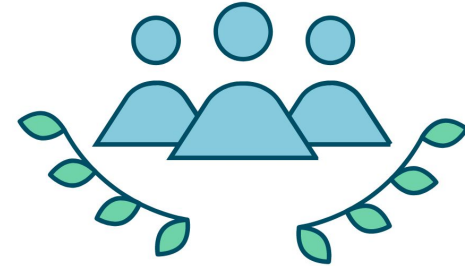
**Technical protocol**

**Technology**



**Operating rules**

**Legal**



**Participatory network**

**Business**

# Technically, DRP is...

## An interoperable request schema and state tracking

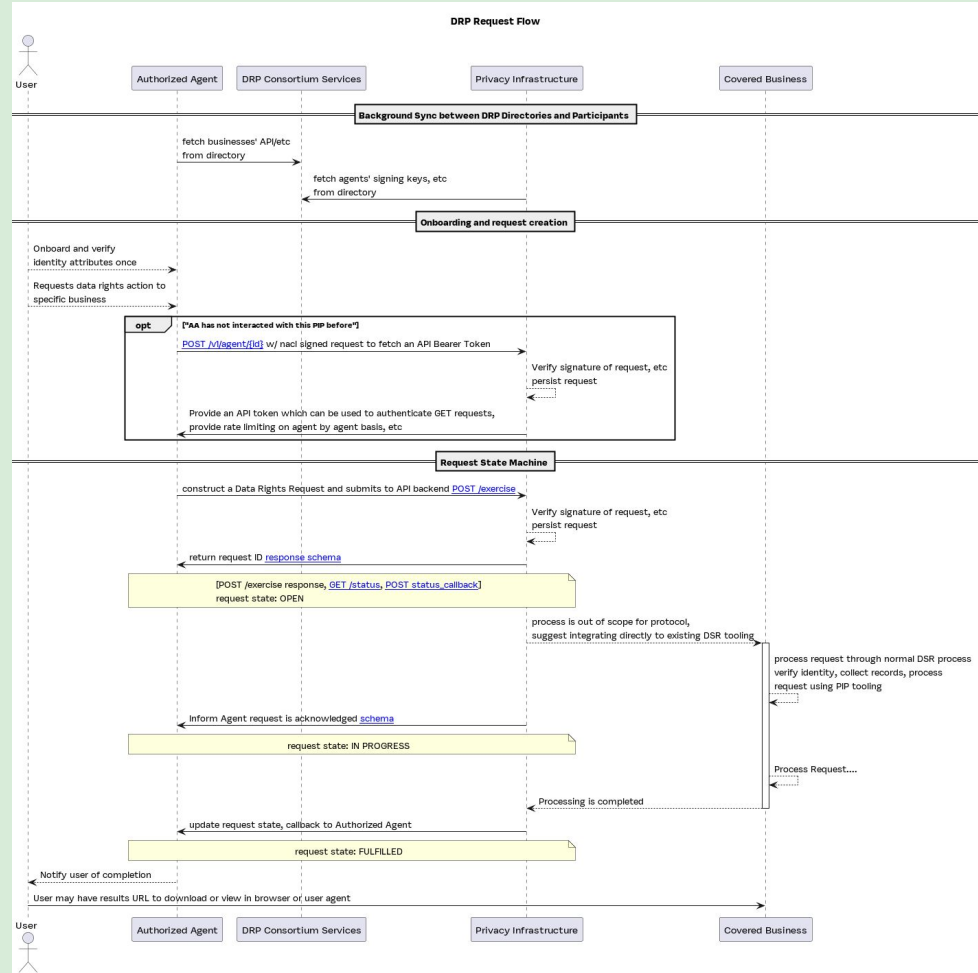
- Consumer identity, request status, delivery dates and deadlines

## Fairly boring technology

- HTTPS, JSON, libsodium signing

## A Simple root of trust

- validating Agent identity
- discovering DRP businesses



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A Simple root of trust

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```
POST /v1/data-rights-request
base64(<signature> {
  "meta": {
    "version": "0.9"
  },
  "regime": "ccpa",
  "exercise": "sale:opt-out"
  "name": "Jane Doe"
  "email": "jane.doe@example.com"
})
```

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Fairly boring technology

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## **A Simple root of trust**

- validating Agent identity
- discovering DRP businesses

```
{
  "id": "CR_AA_DRP_ID_001",
  "name": "OSIRAA Prod Instance",
  "verify_key": "aa3543a2fa54[...]",
  "web_url":
    "https://permissionslipcr.com",
  "technical_contact": "...",
  "business_contact": "...",
  "identity_assurance_url":
    "https://permissionslipcr.com/XXX"
}
```

# Lightweight self-governance of the bounded network of participating businesses

- **DRP common agreement**
  - Describe relationship between Privacy Infrastructure Providers and Covered Businesses
  - Define participation rules and acceptable behavior between Agents and Companies
  - Outline eligibility requirements
- **Transparent documentation of data handling practices**
  - Businesses have Privacy Policies
  - Agents also have Privacy Policies as well as documentation of identity verification processes

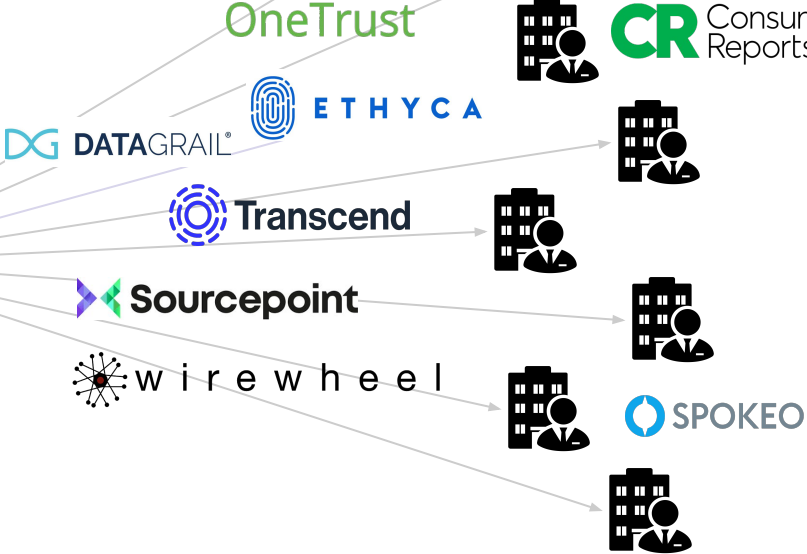
# Lightweight self-governance of the bounded network of participating businesses

- Lightweight operational organization w/o large ongoing costs
  - One vote for each organization
- Implementation certification using [open source test suite and reference implementation](#)
- Github Pages for organizing and deploying service directory
  - Agents, Businesses, and PIPs “nominate” a technical contact to manage their entries in the directory
  - PIPs can be “delegated” control over multiple Business profiles in the same way businesses delegate their Privacy compliance services to the PIP

# Data Rights Protocol is a bounded network of innovative businesses



**PERMISSION SLIP**  
  

**Consumer**  
authorizes agent

**Agent** helps consumer  
submit request

**Privacy compliance tech**  
facilitates request

**Covered business**  
processes request

# DRP is not just Consumer Reports:

**PERMISSION SLIP**  
By Consumer Reports

onetrust

incogni

 Transcend

**CR** Consumer Reports

**DG** DATA GRAIL®

yorba

 ethyca

 SPOKEO

 Mine

 Sourcepoint



# Let's make data rights real.

- <https://datarightsprotocol.org>
- <https://github.com/consumer-reports-innovation-lab/data-rights-protocol>
- [datarightsprotocol@cr.consumer.org](mailto:datarightsprotocol@cr.consumer.org)