

EXHIBIT C

In December 2022, Consumer Reports (CR) received a cy-près award from the Google, Inc. Street View Electronic Communications Litigation (No. 5:10-md-02184 JW). In our original proposal submitted in June 2019, we outlined our efforts to advance the interests of consumers in the digital marketplace. This includes researching consumers' understanding, behavior, and attitudes on digital privacy and security; designing and implementing tests to evaluate technology products, services, and platforms on their collection, use, and protection of personal consumer data; and educating and mobilizing consumers through compelling content about privacy and security, including the dissemination of test results and the provision of actionable information.

With these enduring priorities, our initial activity for this award has been the hiring of a key role, a Campaign Manager for digital rights. This person will augment our team of testers, advocates, analysts, and journalists to map out winning strategies for digital rights issues that impact consumers' daily lives in areas like privacy and data tracking, affordable internet access, and algorithmic bias. Engaging with the CR community, the Campaign Manager will:

- Identify ongoing strategic opportunities to advance consumers' digital rights;
- Conduct research to identify and launch campaign strategies and tactics, and pitch campaigns;
- Build and lead campaign projects from strategy development through execution;
- Work across departments at CR to leverage our unique strengths as a consumer advocacy organization;
- Work with partners to foster organic growth necessary to build power, members, and action takers; and
- Report out on success metrics.

We have filled this position and the candidate will begin this June.

Summary of Recent Activities

Our proposal outlined three main activity areas: research, testing, and ratings; journalism and communications; and advocacy and mobilization. While not financially supported by the award of this cy-près, highlights from our recent digital privacy work include:

Research and Testing

We continue to bring the same level of rigor with which we evaluate traditional consumer products to digital features, products, and services. In the last year, we have tested 21 product categories, representing more than 557 models from 252 brands. Our testing activities identified security issues in a variety of products including baby monitors, home security systems, and robotic vacuum cleaners. As a matter of practice, before we publish our results, we inform manufacturers whenever we find a safety or security concern to allow them the opportunity to mediate issues. Most of the companies have addressed the issues we identified, a few are still in the process of mitigation, and, unfortunately, a few have failed to acknowledge or address the problems. We have also published several white papers including work on [algorithmic auditing](#), [competition in the app marketplace](#), and [memory safety](#).

Journalism & Communications

We continue to provide consumers the information they need to guide their decisions, bring understanding to new market practices, and shine a light on abusive and discriminatory practices. We published extensively on privacy, security, and digital rights including:

- [Facial Recognition Is Coming to Your Neighborhood Through Home Security Cameras and Video Doorbells;](#)
- [CR Finds Potential Consumer Risks for Users of Apple Cash, Cash App, Venmo, and Zelle;](#)
- [What to Do If the Police Ask for Your Video Doorbell Recordings;](#)
- [It's Not Just Ring. Google, SimpliSafe, and Others Could Share Video Footage With Police Without Consent;](#)
- [How to Use Ring's Control Center for Better Privacy and Security;](#)
- [How to Wipe a Computer Clean of Personal Data;](#)
- [Smart Appliances Promise Convenience and Innovation. But Is Your Privacy Worth the Price?;](#)
- [Your Smart Devices Are Trying to Manipulate You With 'Dark Patterns';](#)
- [What Privacy Experts Do About Their Own Digital Privacy;](#) and
- [Pros and Cons of Amazon's Sidewalk Network. Plus, How to Opt Out.](#)

In February of this year, the Federal Trade Commission filed a complaint in federal court against GoodRx prompted by a 2020 CR [investigative report on their privacy practices](#). GoodRx has agreed to pay a \$1.5 million fine and stop sharing sensitive data with advertising companies based on the complaint that alleged GoodRx, which offers coupons on prescription drugs, violated the law by sharing personal health information about its users.

Advocacy & Mobilization

CR has long argued that federal privacy protections are long overdue and we support bipartisan negotiations to develop a consensus solution to these pressing issues. Our federal work has included informing discussion about the American Data Privacy and Protection Act (ADPPA) including constructive dialogue with the House Committee on Energy & Commerce both about the initial draft bill released on June 3rd of last year as well as about the Amendment in the Nature of a Substitute (“AINS”) passed by the Subcommittee on Consumer Protection and Commerce.

We also testified at a legislative hearing, "[Holding Big Tech Accountable: Legislation to Protect Online Users](#)" convened on March 1, 2022 by the Subcommittee on Consumer Protection and Commerce of the Committee on Energy and Commerce.

In 2021, CR developed a model bill for a State Data Privacy Act which laid important groundwork for the multitude of state actions including privacy debates in Connecticut, Delaware, Oklahoma, Rhode Island, Tennessee, and Washington State. The model bill has also been useful in elevating critical concepts like data minimization in on-going regulatory conversations.

We also continue to work for effective enforcement of the California Consumer Protect Action (CCPA). We submitted comments to the California Privacy Protection Agency on its proposed regulations interpreting the CCPA which included suggested additional language on Opt-out preference signals, consent and dark patterns, non-retaliation, transparency, consumer complaints, retargeting, requests to opt out and limit the use of sensitive personal information, and data minimization and purpose limitation.

Permission Slip

As a consumer mobilization tool and to inform our advocacy, CR launched “Permission Slip” in November 2022. This [mobile app](#) makes it easy for consumers to take control of their personal data by showing what kinds of data specific companies collect and enabling consumers to tell a company to stop selling or delete their data entirely with just a simple tap. Permission Slip is free to use and [available on iOS](#), with an Android version expected this year.

Permission Slip is an important vehicle for consumer engagement that has the potential to shape future debates and legislation. Lawmakers in Washington and statehouses are watching what happens in California—if the new rights granted by CCPA go unused, other states will be discouraged from crafting their own privacy legislation. And if the overall effect of CCPA is to increase companies’ compliance costs without tangible benefits to consumers, momentum for expanding data rights in the U.S. could stall. On January 27th of this year—ahead of Data Privacy Day—the California Attorney General announced an investigative sweep, sending letters to businesses with mobile apps that fail to comply with the California Consumer Privacy Act (CCPA). In the press release, the AG specifically referenced Permission Slip and put businesses on notice if they were failing to process consumer requests submitted via an authorized agent, as required by the CCPA.

Data Rights Protocol

In tandem with our work on Permission Slip, we recognized that some companies want to comply with the data requests enabled by the CCPA, but struggle to find efficient mechanisms to do so. In response, CR convened an industry group of privacy compliance tech providers to align on a technical specification—and supporting governance structure—for the [Data Rights Protocol](#) (DRP). We continue to facilitate the co-development of this technical standard for exchanging data rights requests under CCPA with a consortium of implementing companies who serve in the role of authorized agent, privacy infrastructure provider, and/or covered business.