PLAINPRIVACY

Technical Privacy & Consent Review

Anonymized Shopify storefront

Scope

Review of cookies, pixels and other browser-observable tracking; regional consent-banner behavior; consent choices; and the U.S. sale/sharing opt-out flow. Tests were performed from multiple locations using fresh browser sessions and Chrome DevTools.

Prepared for: Anonymous ecommerce business

Prepared by: PlainPrivacy

Review period: 2026

Platform: Shopify

PUBLIC EXAMPLE - ANONYMIZED

Business identifiers, unique analytics IDs and screenshots were removed. Findings are preserved from a real technical review. No implementation or remediation is claimed.

Executive summary

The consent implementation is generally behaving consistently with its regional configuration. In Germany, optional analytics and marketing cookies were not observed before a choice was made; Reject kept those cookies absent; and Accept enabled the expected analytics and marketing cookies. In California, Shopify's sale/sharing preference changed from allowed to blocked after the opt-out flow, and subsequent retesting did not reproduce the earlier Meta-event concern.

Two areas deserve follow-up. First, the published cookie information appears incomplete compared with the technologies currently observed in the browser. Second, after a cookie choice was made in Germany, no readily accessible control for reopening and changing cookie preferences was identified during testing, even though the banner says choices can be changed at any time.

Area	Result	Summary
Germany consent flow	Working	Optional cookies were blocked before consent and after Reject; Accept enabled analytics/marketing cookies.
California sale/sharing	Working in test	Shopify reported sale_of_data='no' and saleOfDataAllowed()=false after opt-out.
Regional behavior	Observed	Different interfaces were served in Germany, California/Virginia, while no banner was observed in New York.
Cookie disclosure	Review needed	Observed cookie inventory is broader than the published cookie table.
Change/withdraw consent	Review needed	No persistent cookie-settings control was identified after a choice in Germany.

1. Test methodology

Testing used fresh browser sessions, Chrome DevTools (Application, Network and Console), and location-specific IP endpoints. The review focused on what a normal visitor's browser could observe. It did not include Shopify admin access, tag-manager container access, server-side logs, advertising-platform settings, or legal analysis.

Locations tested included Germany (Frankfurt), California (San Francisco), Virginia (Ashburn) and New York. The tests compared initial page load, Reject, Accept, and the Shopify data sale/sharing opt-out state where applicable.

2. Germany / EEA consent behavior

2.1 Before a choice

A consent banner was displayed with Preferences, Reject and Accept. Before interaction, the browser showed only a small set of essential/consent-related cookies. Analytics and marketing cookies such as _ga, _fbp and _gcl_au were not observed.

GERMANY - BEFORE INTERACTION

Consent-related cookies observed; optional analytics and marketing storage not observed.

Original screenshot removed to protect website identity.

Evidence: Germany before interaction. Consent-related state is present while common analytics/marketing cookies are absent.

2.2 Reject

After Reject, cookieconsent_status was recorded as deny and cookieconsent_preferences_disabled included analytics, marketing and functionality. Common analytics and marketing cookies remained absent. This is strong browser-level evidence that the banner is controlling optional storage rather than merely recording a cosmetic preference.

GERMANY - AFTER REJECT

Optional analytics and marketing storage remained absent.

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Evidence: Germany after Reject. Optional analytics/marketing cookies remain absent.

2.3 Accept

After Accept, the consent status changed to allow and analytics/marketing cookies appeared, including _fbp, _ga, _ga_* variants, _gcl_au, _shopify_analytics and _shopify_marketing. This before/after comparison demonstrates a change in browser-observed tracking behavior.



Evidence: Germany after Accept. Analytics and marketing cookies are now present.

2.4 Ability to change or withdraw consent

The banner states that visitors can change their choices at any time in the cookie settings. After a choice was made, however, no persistent Cookie Settings, Privacy Settings or equivalent consent-management control was identified during the pages tested. The footer contained the ordinary site links but no obvious mechanism to reopen the consent preferences.

Recommended action

Add or verify a persistent, readily accessible control (for example, 'Cookie Settings') that reopens the consent interface and allows a visitor to change or withdraw previously granted choices. The EDPB states that withdrawing consent should be as easy as giving it.

3. U.S. regional behavior

The storefront did not present one universal U.S. experience. The interface changed by location, which indicates that regional privacy configuration is active.

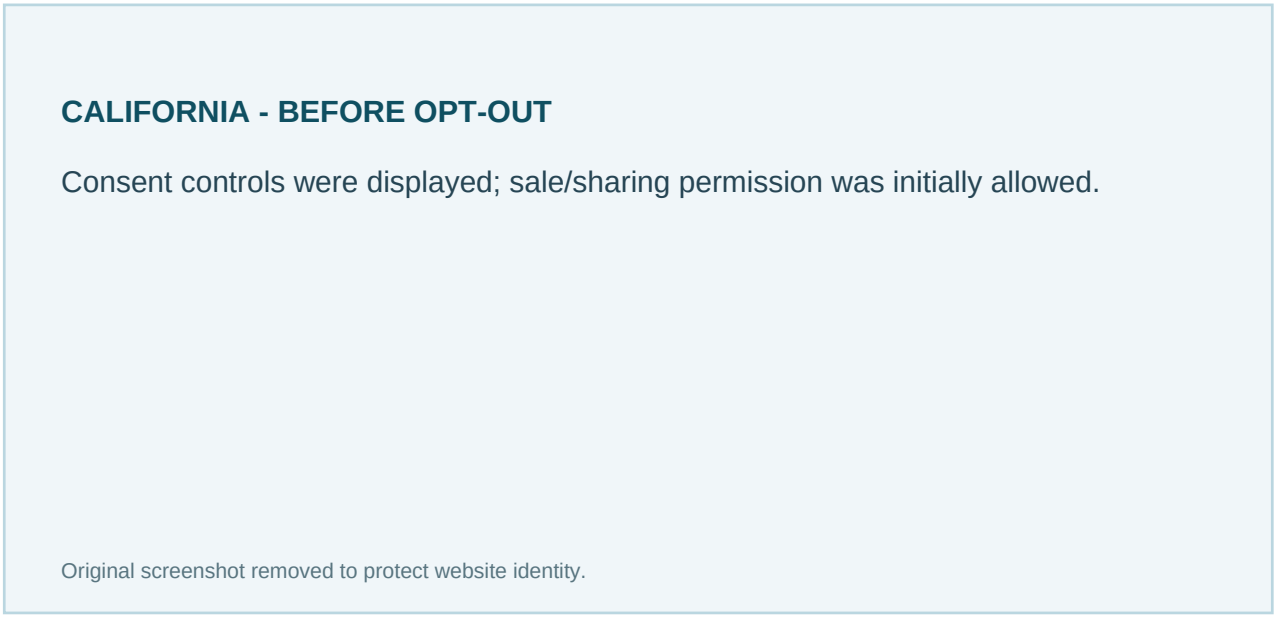
3.1 California

In California, a consent banner with Preferences, Reject and Accept was observed. A separate 'Your privacy choices' flow successfully recorded a sale/sharing opt-out. Before opting out, Shopify's Customer Privacy API returned

saleOfDataAllowed() = true.

CALIFORNIA - BEFORE OPT-OUT

Consent controls were displayed; sale/sharing permission was initially allowed.



Evidence: California consent banner with Preferences, Reject and Accept.

After the opt-out, currentVisitorConsent() reported sale_of_data: 'no' and saleOfDataAllowed() returned false.

CALIFORNIA - AFTER OPT-OUT

Shopify's Customer Privacy API reported sale_of_data='no'; saleOfDataAllowed() was false.



Evidence: California after opt-out. Shopify reports sale_of_data='no' and saleOfDataAllowed()=false.

An earlier test raised a question about Meta PageView activity after opt-out. The issue could not be reproduced in subsequent clean retests, where Meta events stopped appearing. For that reason, it is not reported here as a confirmed defect. If the merchant wants additional assurance, the Shopify/Meta integration can be reviewed from the administrative side.

3.2 Virginia

A Virginia endpoint (Ashburn) received a regional banner offering 'Do not sell or share' and Accept. This differs from the Germany consent interface and is consistent with the site's use of regional privacy experiences.

VIRGINIA - REGIONAL INTERFACE

A regional banner provided a Do not sell or share action and an Accept choice.

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Evidence: Virginia test showing the regional 'Do not sell or share' interface.

3.3 New York

From the New York endpoint tested, no consent banner was observed on initial load. Analytics and marketing-related cookies were already present, including _fbp, _ga, _gcl_au, _shopify_analytics and _shopify_marketing. This is documented as observed regional behavior, not as a legal-compliance conclusion.

NEW YORK - INITIAL VISIT

No consent banner was observed in the tested session; analytics/marketing cookies were present.

Original screenshot removed to protect website identity.

Evidence: New York test. No banner is visible and analytics/marketing cookies are present.

4. Cookie and tracking inventory

The browser tests observed Google Analytics/Google advertising-related storage, Meta-related storage and Shopify analytics/marketing storage after consent or in regions where those technologies were active. Observed examples included:

Observed item	Likely role / source
_ga, _ga_*	Google Analytics-related storage
_gcl_au	Google advertising / conversion-related storage
_fbp	Meta/Facebook browser identifier
_shopify_analytics	Shopify analytics
_shopify_marketing	Shopify marketing
_shopify_essential	Shopify essential functionality
Other app storage	App-related storage

4.1 Published cookie information

The Privacy Policy is marked 'Last updated: date withheld and contains a static cookie table. The table does not appear to fully reflect the current browser-observed inventory. In particular, several cookies observed during testing, including _fbp, _ga, _ga_* variants, _gcl_au, _shopify_analytics and _shopify_marketing, were not identified in the supplied cookie table.

This does not mean every cookie in the policy is obsolete: some cookies are only created during checkout, account, payment or other specific flows. The practical recommendation is to reconcile the published inventory against the site's current CMP/app scanner and live tracking configuration rather than maintaining the list solely by hand.

PUBLISHED COOKIE LIST

The published cookie table did not cover all storage observed during browser testing.

Original screenshot removed to protect website identity.

Evidence: published Privacy Policy cookie table.

Evidence: Privacy Policy marked last updated date withheld

5. Google tracking / consent signaling

Google collection requests were observed in restricted states before consent/rejection and in fuller states after consent. During the tests, Google requests included consent-related parameters and non-personalized/denied indicators in restricted states. Because Google uses internal and evolving consent parameters, this review does not rely on decoding every gcs/gcd value. The more reliable browser evidence is the combination of the consent decision, absence/presence of persistent optional cookies, and the request-level consent indicators.

Interpretation

The Germany tests support that optional persistent analytics/marketing storage is gated by consent. Google Consent Mode can still send restricted or cookieless measurement pings when consent is denied; the presence of a Google request alone is therefore not proof that full analytics consent was granted.

6. Findings and recommended actions

Priority 1 - Make consent preferences easy to reopen

Verify or add a persistent Cookie Settings control after a visitor makes a choice. It should reopen the same preference interface and allow analytics, marketing and preference choices to be changed or withdrawn.

Priority 2 - Refresh the cookie/tracker disclosure

Reconcile the Privacy Policy's cookie table with the current Shopify/CMP scanner and live site. Add current Google, Meta, Shopify and relevant app technologies where appropriate, and remove or update entries that no longer reflect the implementation.

Priority 3 - Confirm regional configuration in Shopify/CMP

The regional behavior is clearly differentiated. Confirm that the intended regions are configured in the merchant's Shopify Customer Privacy settings or the installed consent app, especially the states/regions where a banner or sale/sharing opt-out should be shown.

Priority 4 - Optional administrative verification

For higher assurance, review the Shopify Web Pixels / Meta integration, Google tag configuration and CMP settings from the merchant side. Browser testing can confirm observable behavior, but administrative access is needed to verify how each downstream platform is configured to process restricted or opted-out traffic.

7. Conclusion

The core consent mechanics tested in Germany worked: optional tracking storage was absent before consent, Reject maintained that restricted state, and Accept enabled the expected analytics/marketing storage. California's sale/sharing opt-out also registered correctly in Shopify's Customer Privacy API during the final tests.

The clearest remediation opportunities are documentation and consent management: update the published cookie/tracker inventory and ensure visitors can easily reopen and change their cookie preferences after their initial choice. No conclusion in this report should be read as a legal determination of compliance.

Technical references

Shopify Customer Privacy API - permission methods, regional banner logic and sale/sharing opt-out behavior.

Google Consent Mode documentation - consent states and restricted measurement behavior.

European Data Protection Board guidance - consent must be freely withdrawable, and withdrawal should be as easy as giving consent.