

BEFORE THE CALIFORNIA PRIVACY PROTECTION AGENCY

In the Matter of:

FORD MOTOR COMPANY

Respondent.

Case No. ENF23-V-FO-3


ORDER OF DECISION

The Board of the California Privacy Protection Agency hereby adopts the Stipulated Final Order, attached hereto, as its decision in the above-captioned matter.

This Decision shall become effective immediately.

IT IS SO ORDERED this 27th day of February, 2026.

BY THE BOARD:



JENNIFER M. URBAN
Chair
California Privacy Protection Agency

MICHAEL S. MACKO
Deputy Director of Enforcement
LARA KEHOE HOFFMAN
Assistant Chief Counsel
ALEX D. BERGER (State Bar No. 353829)
MICHAEL J. MEYER (State Bar No. 242706)
Attorneys
Enforcement Division
California Privacy Protection Agency
400 R Street, Suite 350
Sacramento, CA 95811
Telephone: (916) 244-6626
Email: michael.meyer@coppa.ca.gov
Attorneys for Complainant

BEFORE THE CALIFORNIA PRIVACY PROTECTION AGENCY

In the Matter of:

FORD MOTOR CO.

Respondent.

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STIPULATED FINAL ORDER

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-captioned matter:

I. PARTIES

1. Complainant is the Enforcement Division of the California Privacy Protection Agency (“Agency”), which enforces the California Consumer Privacy Act of 2018, Civ. Code §§ 1798.100–1798.199.100, as amended (“CCPA”).¹

2. Respondent is Ford Motor Company (“Ford”), a Delaware corporation with its principal place of business at 1 American Road, Dearborn, Michigan 48126.

II. JURISDICTION

3. Pursuant to Civil Code sections 1798.199.40(a) and 1798.199.55, the Agency may enforce the CCPA through administrative actions.

¹ All statutory references are to California law unless otherwise indicated.

4. Pursuant to Government Code section 11415.60(a), the Agency may formulate and issue a decision by settlement, pursuant to an agreement of the parties, without conducting an adjudicative proceeding.

5. Ford is a for-profit corporation that collects consumers' personal information and determines the purposes and means of the processing of consumers' personal information. The company has an annual gross revenue in excess of \$26.625 million, and the company annually sells or shares, in combination, the personal information of 100,000 or more consumers or households. Ford conducted business within the State of California at all times relevant to this Stipulated Final Order.

III. DEFINITIONS

The following terms in this Stipulated Final Order shall have these meanings:

6. "Agency" means the California Privacy Protection Agency.
7. "Collect" has the same meaning as provided in Civil Code section 1798.140(f).
8. "Consumer" has the same meaning as provided in Civil Code section 1798.140(i).
9. "CCPA" means the California Consumer Privacy Act of 2018, Civ. Code §§ 1798.100–1798.199.100, as amended, and its implementing regulations.
10. "Digital properties" means all public-facing websites and mobile applications owned or operated by Ford that are accessible by consumers and subject to the CCPA, including without limitation, <https://www.ford.com/> and the Ford mobile application.
11. "Enforcement Division" means Complainant, the Enforcement Division of the California Privacy Protection Agency.
12. "Ford" means Respondent, Ford Motor Company.
13. "Personal information" has the same meaning as provided in Civil Code section 1798.140(v).
14. "Regulations" mean Title 11 of the California Code of Regulations.
15. "Request to opt-out of sale/sharing" has the same meaning as provided in California Code of Regulations, title 11, section 7001(rr).
16. "Sale" or "sell" has the same meaning as provided in Civil Code section 1798.140(ad).
17. "Share" and "sharing" has the same meaning as provided in Civil Code section 1798.140(ah).
18. "Verifiable consumer request" has the same meaning as provided in Civil Code section 1798.140(ak).

IV. FACTUAL FINDINGS

19. For over a century, Ford has manufactured and sold vehicles in the United States. Given Ford's history, Ford vehicles are visible on roadways throughout California. Hundreds of thousands of Californians have purchased Ford vehicles.

20. The Enforcement Division opened an investigation into Ford's privacy practices and its compliance with the CCPA as part of a general inquiry into vehicle manufacturers' privacy practices by the Enforcement Division. During the investigation, Ford cooperated with the Enforcement Division, produced documents, answered questions, and engaged in candid discussions about Ford's privacy practices. Ford also updated certain components of its process to respond to requests to opt-out of sale or sharing during the course of the investigation.

21. The relevant time period is July 1, 2023, to March 1, 2024, unless otherwise indicated.

A. Ford Required a Verifiable Consumer Request Before Processing a Request to Opt-Out of the Sale/Sharing of Personal Information.

22. Consumers have the right, at any time, to opt out of the sale or sharing of their personal information. Civ. Code § 1798.120(a)(1).

23. A business that sells or shares personal information must provide a notice of right to opt-out of sale/sharing to consumers. Code Regs., tit. 11, § 7013(e). If a business provides such notice online, it must include an interactive form by which a consumer can submit a request to opt-out of sale/sharing online. *Id.* § 7013(f)(2).

24. A business may not require consumers to submit verifiable consumer requests to opt out of the sale/sharing of their personal information. *Id.* § 7026(d).

25. A "verifiable consumer request" is a request that is made by a consumer (or on behalf of a consumer) that the business can verify, using commercially reasonable methods, to be the consumer about whom the business has collected personal information. *See* Civ. Code § 1798.140(ak).

26. Although a business may require consumers to submit a verifiable consumer request to exercise their right to delete, right to know, and right to correct, a business may not require a verifiable consumer request for the right to opt-out. *See* Code Regs., tit. 11, §§ 7022(a), 7023(a), 7024(a)–(b), and 7026(d).

27. Instead, for requests to opt-out of sale/sharing:

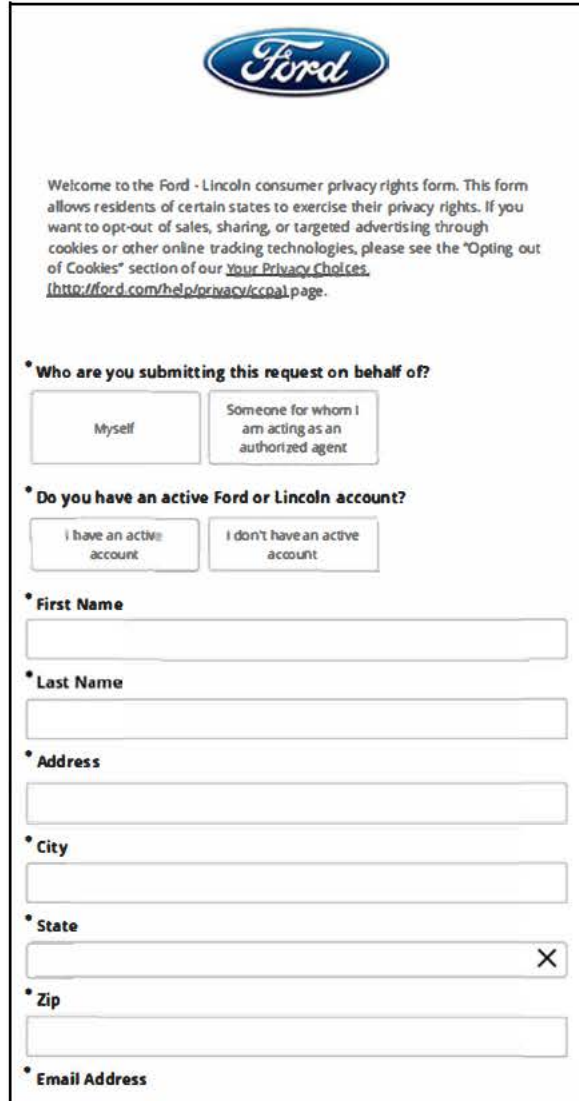
A business may ask the consumer for information necessary to identify the consumer whose information shall cease to be sold or shared by the business. *However, to the extent that the business can comply with a request*

to opt-out of sale/sharing without additional information, it shall do so.

Id. § 7026(d) (emphasis added).

28. During the relevant period, Ford provided notice of the right to opt-out online and provided the following interactive form for consumers to submit requests to opt-out of sale/sharing:

Figure 1: Ford's Consumer Privacy Rights Form



The image shows a screenshot of the Ford Consumer Privacy Rights Form. At the top center is the Ford logo. Below the logo is a welcome message: "Welcome to the Ford - Lincoln consumer privacy rights form. This form allows residents of certain states to exercise their privacy rights. If you want to opt-out of sales, sharing, or targeted advertising through cookies or other online tracking technologies, please see the 'Opting out of Cookies' section of our [Your Privacy Choices](\"http://ford.com/help/privacy/ccpaal\"). [http://ford.com/help/privacy/ccpaal](\"http://ford.com/help/privacy/ccpaal\") page.

The form contains several sections with radio button options and text input fields:

- Who are you submitting this request on behalf of?**
 - Myself
 - Someone for whom I am acting as an authorized agent
- Do you have an active Ford or Lincoln account?**
 - I have an active account
 - I don't have an active account
- First Name**: [Text input field]
- Last Name**: [Text input field]
- Address**: [Text input field]
- City**: [Text input field]
- State**: [Dropdown menu with a close button (X)]
- Zip**: [Text input field]
- Email Address**: [Text input field]

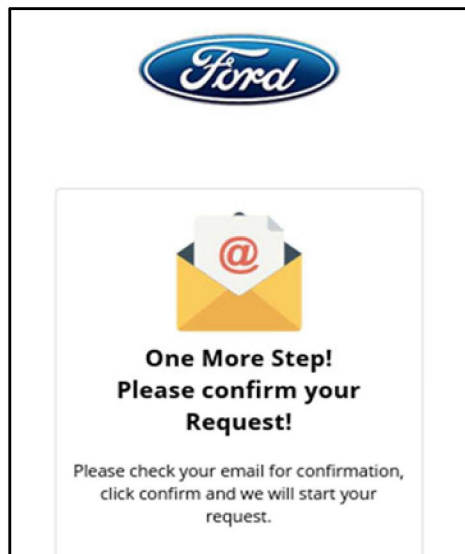
[Figure 1 continues on next page]

29. Consumers used this interactive form to exercise various consumer rights, including the right to opt-out, related to personal information collected by Ford, including through its digital properties and connected vehicle services. To exercise these rights, consumers filled out the required fields, completed the reCAPTCHA, and clicked “submit.”

30. After consumers submitted requests to opt-out of sale/sharing through Ford’s consumer privacy rights form, Ford could have processed those requests without requiring additional information.

31. Instead, after consumers submitted the interactive form, Ford displayed the following message on their screens:

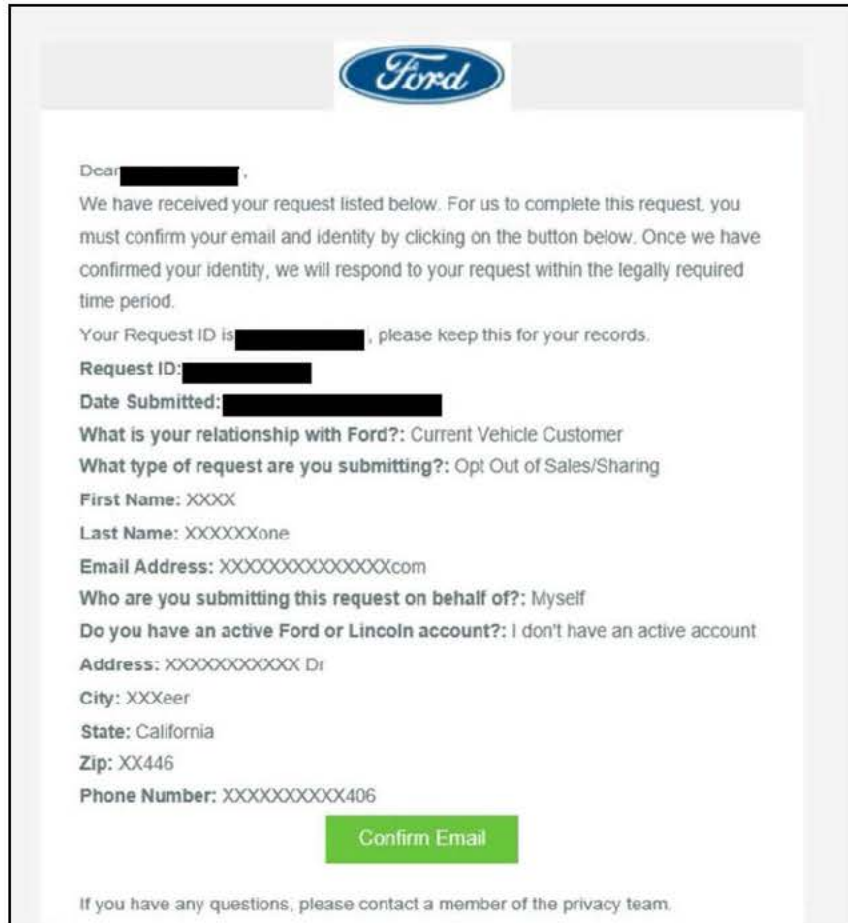
Figure 2: Page Displayed after Submitting a Request to Opt-Out of Sale/Sharing



32. Rather than processing consumers’ requests to opt-out—and stopping the selling and sharing of consumers’ personal information as soon as feasibly possible—Ford directed consumers to check their “email for confirmation” and to “click confirm.” Only then would Ford start to process their requests.

33. For those consumers who did check their email, Ford presented them with the following message:

Figure 3: Email to Consumers Requiring Verification Before Processing Request to Opt-Out of Sale/Sharing



34. In this message, Ford informed consumers that it had received the request, but before Ford would complete it, “you must confirm your email and identity by clicking the button below.” Ford further explained that, “[o]nce we have confirmed your identity,” Ford would “respond to your request within the legally required time period.”

35. During the relevant period, Ford deemed as “expired” all requests to opt-out of sale/sharing submitted by consumers who did not click “Confirm Email” in this message. This resulted in Ford not processing dozens of requests to opt-out within the period required by the CCPA. Ford subsequently processed these requests in response to the Enforcement Division’s investigation.

36. Ford did not intend to require consumers to submit a verifiable consumer request to exercise their right to opt-out of the sale/sharing of personal information. Nor did Ford intend to include the language asking consumers to confirm their identities in the email sent to consumers in response to their requests to opt-out.

37. Nevertheless, Ford's practice of requiring consumers to confirm their access and control over their email address before processing a request to opt-out of sale/sharing impermissibly required consumers to submit a verifiable consumer request. This practice created unnecessary friction for consumers to exercise their opt-out rights. Consistent with section 7026(d) of the regulations, Ford should have processed consumers' requests to opt-out with the information consumers provided through Ford's consumer privacy rights form, shown in Figure 1, to the extent it was able to do so within the period required by the CCPA.

38. Accordingly, each time Ford required a consumer to submit a verifiable consumer request to exercise the right to opt-out, Ford violated section 7026(d) of the regulations.

B. Ford Sold/Shared Personal Information After Consumers Requested to Opt-Out.

39. A business that has received direction from a consumer not to sell or share the consumer's personal information is prohibited from continuing to sell or share that consumer's personal information. Civ. Code §§ 1798.120(d), 1798.135(c).

40. As shown above, Ford provided consumers with an interactive privacy request form by which consumers could exercise various consumer rights, including the right to opt-out, by filling out the required fields, completing the reCAPTCHA, and clicking "submit."

41. Each consumer who submitted Ford's interactive form to exercise the right to opt-out thereby directed Ford to stop the sale and sharing of personal information. To the extent Ford could comply with those requests to opt-out, it should have done so.

42. Instead, as described in section A, above, Ford did not process dozens of requests to opt-out within the period required by the CCPA. As a result, Ford continued to sell/share these consumers' personal information, despite those consumers' direction to Ford to stop.

43. Accordingly, Ford violated Civil Code section 1798.120(d) each time Ford subsequently sold or shared the personal information of a consumer who previously submitted a request to opt-out through Ford's consumer privacy rights request form.

V. CONTINGENCY

44. This Stipulated Final Order shall be contingent upon approval by the Board of the California Privacy Protection Agency ("Board"). Ford understands and agrees that counsel for Complainant and the staff of the Agency may communicate directly with the Board and the staff of the Agency regarding this Stipulated Final Order, without notice to or participation by Ford or its counsel. By signing the Stipulated Final Order, Ford understands and agrees that it may not withdraw its agreement or seek to rescind the Stipulated Final Order before the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Order of Decision, the

Stipulated Final Order shall be of no force or effect except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Agency shall not be disqualified from further action by having considered this matter.

VI. OTHER MATTERS

45. The parties understand and agree that Portable Document Format (PDF) and facsimile copies of this Stipulated Final Order, including PDF and facsimile signatures thereto, shall have the same force and effect as the originals. The parties may execute this Stipulated Final Order in counterparts.

46. This Stipulated Final Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Final Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

47. In consideration of the foregoing stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order of Decision:

VII. ORDER

IT IS HEREBY ORDERED that:

A. Monetary Provision

48. In accordance with Civil Code section 1798.199.55, Ford shall pay an administrative fine in the amount of three hundred seventy-five thousand seven hundred three dollars (\$375,703). This payment shall be made to the California Privacy Protection Agency no later than thirty (30) days after the effective date of the Board's decision approving the Stipulated Final Order pursuant to written instructions to be provided by the Enforcement Division.

B. Compliance with Law

49. As required by the CCPA, Ford shall comply with the following provisions of the CCPA and its implementing regulations: Civil Code sections 1798.100, 1798.120, and 1798.135, and California Code of Regulations, title 11, sections 7004, 7013, and 7022–7026.

50. To the extent it has not already done so, Ford shall modify its methods for submitting and responding to requests to opt-out of sale/sharing in the following ways as required by the CCPA:

- a. Ford shall provide consumers with methods to exercise their right to opt-out of sale/sharing that are easy and require minimal steps;

- b. Ford shall not require verifiable consumer requests for consumers to exercise their right to opt out of sale/sharing; and
- c. When a consumer submits a request to opt-out of sale/sharing, Ford shall honor that request to the extent that it is able to do so within the time period required by the CCPA.

51. Ford shall conduct an audit of the tracking technologies, such as cookies, web beacons, and pixels, on its website, Ford.com, to ensure that each such tracking technology is properly configured to honor consumers' use of opt-out preference signals, such as the Global Privacy Control, where required by Code of Regulations, title 11, section 7025.

52. Ford shall complete the actions required by paragraphs 50–51 and confirm in writing to the Enforcement Division that it has completed these actions within 90 days of the effective date of this Stipulated Final Order.

53. Each party shall bear its own attorneys' fees and costs.

VIII. ADDITIONAL GENERAL PROVISIONS

54. By entry of this Stipulated Final Order and following Ford's compliance with all terms set forth in paragraphs 48–52, the Agency releases Ford (including its subsidiaries, affiliates, officers, directors, heirs, administrators, executors, successors, and transferees) from and against all claims the Agency has under the CCPA arising from the conduct set forth in the factual findings of this Stipulated Final Order.

55. Nothing in this Stipulated Final Order shall be construed as relieving Ford of its obligations to comply with all state and federal laws, regulations, or rules, or as granting permission to engage in any acts or practices prohibited by such law, regulation, or rule.

56. Ford shall use reasonable efforts to notify its officers, directors, employees, agents, and contractors responsible for carrying out and effecting the terms of this Stipulated Final Order and the requirements therein.

57. Ford agrees that the terms of this Stipulated Final Order are in the public interest and fair, adequate, and reasonable under all the circumstances.

58. Ford neither admits nor denies the truth of the factual findings in this Stipulated Final Order. Ford does not admit liability for any violation of CCPA, actual or alleged. Ford agrees to be bound by the terms of this Stipulated Final Order.

59. Ford hereby waives the right to any hearings, and to any reconsideration, appeal, or other right to review which may be afforded pursuant to the California Administrative Procedures Act, the California Code of Civil Procedure, or any other provision of law. By waiving such rights, Ford effectively consents to this Stipulated Final Order becoming final.

60. This Stipulated Final Order shall bind Ford's subsidiaries, heirs, administrators, executors, successors, and transferees.

61. Notwithstanding paragraph 53, in the event the Agency prevails in seeking to enforce any term of this Stipulated Final Order, the Agency shall be entitled to an award of attorney fees and costs in its favor and against Ford for the time spent and costs incurred in prosecuting such action.

62. Failure to complete the payment or comply with any terms of this Stipulated Final Order shall result in enforcement of the Order in the Superior Court.

63. Any notices and reports under this Stipulated Final Order shall be served by email as follows:

To the Complainant:

Deputy Director, Enforcement Division
California Privacy Protection Agency
400 R Street, Suite 350
Sacramento, CA 95811
ENF-processing@coppa.ca.gov

To the Respondent:

Jane Regan, Esq.
Ford Motor Company
Office of the General Counsel
World Headquarters
One American Road
Dearborn, MI 48126
jregan18@ford.com

64. Each person who signs this Stipulated Final Order in a representative capacity warrants that he or she is duly authorized to do so. Further, each party itself (a) acknowledges that such party has been advised by competent legal counsel in connection with the execution of this Stipulated Final Order, has read each and every paragraph of this Stipulated Final Order, and understands the respective rights and obligations set forth herein, and (b) represents that the commitments, acknowledgment, representations, and promises set forth herein are freely and willingly undertaken and given.

65. Ford represents that this Stipulated Final Order is freely and voluntarily entered without any degree of duress or compulsion whatsoever.

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IX. SIGNATURES

RESPONDENT
FORD MOTOR COMPAY

DATED: 2/17/2026 | 10:19 AM EST

BY: 
Jane Regan, Esq.
Associate General Counsel
FORD MOTOR COMPANY

AS TO FORM AND CONTENT:


Andreas Kaltsounis, Esq.
Taylor Bloom, Esq.
Baker & Hostetler, LLP
Attorneys for Respondent

COMPLAINANT
THE CALIFORNIA PRIVACY PROTECTION AGENCY
ENFORCEMENT DIVISION

DATED: February 17, 2026

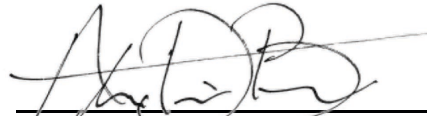
BY:



MICHAEL S. MACKO
Deputy Director of Enforcement



LARA KEHOE HOFFMAN
Assistant Chief Counsel



ALEX D. BERGER
Attorney, Enforcement Division
Attorney for Complainant



MICHAEL J. MEYER
Attorney, Enforcement Division
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