

Good Practice Initiative for Cookie Banner Consent Management

Design Guidelines

created in cooperation with and as a result of a European multi-stakeholder process with businesses, consumer organisations, digital rights associations, academia and government authorities

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Good Practice Initiative for Cookie Banner Consent Management

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created in cooperation with and as a result of a European multi-stakeholder process with website providers, online shops, consent management system providers, consumer organisations, digital rights associations, academia, and government authorities

Many website providers, platforms, content providers and organisations are using cookies, tracking technologies and other tools for collecting and processing consumer data for different purposes like profiling, personalizing services and targeted advertising. The EU-ePrivacy Directive and the General Data Protection Regulation, when read jointly, require consent for the installation of cookies and the subsequent collection and processing of data under the conditions mentioned there. Cookie banners are the tool that is commonly used to respond to these legal obligations and to ask consumers for consent. Therefore, the cookie banner is usually the first element that consumers see when visiting a website.

In practice, however, cookie banners are anything but consumer-friendly. Often consent is obtained through misleading or manipulative design and/or wording ("dark patterns"). The rejection of cookies is often only possible via complicated submenus and requires a lot of effort. The legal standards are regularly not complied with. This results in consumers not being able to exercise their rights, which ultimately leads to negative consequences for consumers and legal disputes with undesired consequences for businesses alike.

Against this background, a European multi-stakeholder Initiative has developed the following Good Practice Design Guidelines for consumer-friendly, privacy enhancing and legally compliant cookie banner design for service providers, websites, platforms, and content providers. The Guidelines focus on consent management for cookies, but they are also relevant for other kinds of tracking technology that imply access to a user's device or collect data related to a device such as web beacons or browser fingerprinting.

The Good Practice Design Guidelines are intended as a guide for practitioners as to which aspects should be taken into account for cookie banner and consent management in terms of consumer-friendliness. The Guidelines are not meant to give legal guidance on the interpretation of the relevant legal provisions, but they are developed from a design perspective with the aim of creating a fair and transparent communication between businesses and consumers.

The Good Practice Design Guidelines relate to cookie banners that offer various options of consenting to or rejecting cookies. They do not address the situation where the website provider offers the possibility for using a website or service without cookies (for example by payment).

The following Good Practice Design Guidelines are graphically illustrated by a model cookie banner. The model cookie banner is meant to give guidance as to how the information flow in cookie banners should be structured and how choice options should be presented to users. The concrete wording of the text in the model cookie banner is open for alternative wording, provided that this wording is in line with the design principles described in this document.

The following businesses and organisations have participated in creating the Good Practice Design Guidelines, support its principles and intend to implement its principles in practice (in alphabetical order):

- Access Now
- BEUC – The European Consumer Organisation
- CookieFirst
- German Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection
- Prof. Dr. Max von Grafenstein, Einstein Center Digital Future (ECDF)
- Privacy International
- Telefónica Germany GmbH & Co. OHG

The project has been funded by the German Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection in the context of its Corporate Digital Responsibility Initiative. For details on the participatory approach and the procedural steps, see the description in Annex 2.

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1 Initial consumer interaction: The first layer of a cookie banner

1.1 Cookie banners should only be used when consent is required.

Cookie banners should be designed to **enable consumers to make a choice whether they consent to cookies being stored on their device and to their data being processed by a business or an organisation**. That means that cookie banners should only be used when a business or organisation wants to collect and process information that legally requires **consent**.

If, on the other hand, consent **for a cookie when using a website or an internet service is not legally required, there is no need for a cookie banner**. Consumers should, however, be informed in a different way about the use of these cookies, i.e., in the privacy policy. If, on the other hand, cookies that do not require consent are used in addition to those that require consent, information about the cookies that do not require consent can also be provided in the cookie banner.

1.2 Cookie banners should be designed for choice.

For consumers to make an informed decision about consent, **the cookie banner should be designed in a separate element which is immediately visible in a clearly noticeable location on the first page (landing page) when opening a website**.

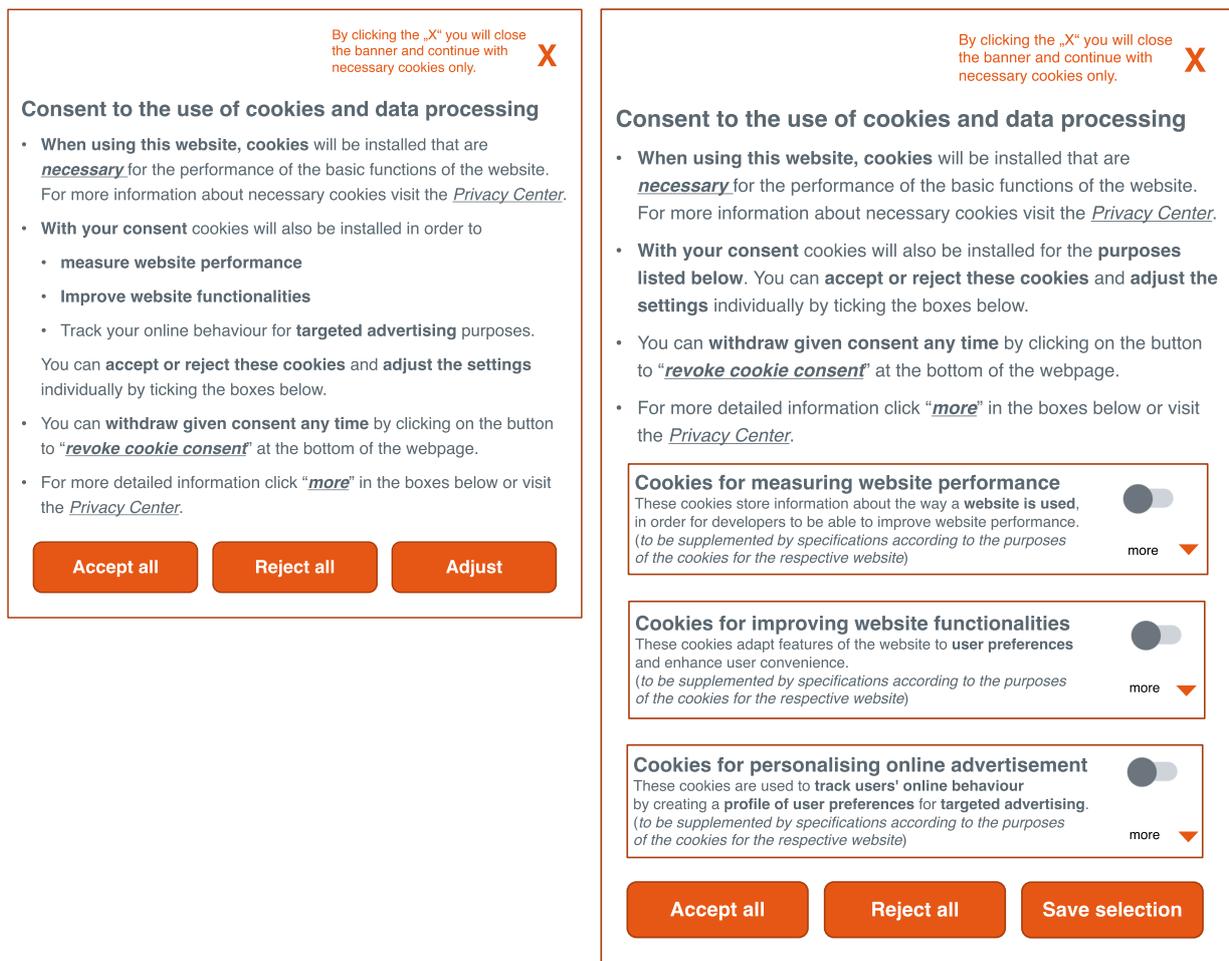
Cookie banners should be designed so that **consumers always have a choice** as to whether cookies are installed and used. Cookie banner design does not comply with this principle if access to a website is given only under the condition that consumers consent to installation of cookies and collection of data. **From a consumer perspective, there should always be another fair, reasonable and equivalent access to the service or website without cookies except for strictly necessary ones**.

1.3 Two ways to start: Choice options for specific purposes can be presented on the first or second layer.

The first layer should **inform consumers** in a brief form about the **cookies and other tools of data processing** that are being used on the website, about the **purposes of data processing**, about the **choice options** consumers have, and about the **right of withdrawal**.

The model cookie banner presented below also contains information about necessary cookies. This serves to give consumers a total overview about cookies used by the provider. Alternatively, the information about necessary cookies can be left out in the cookie banner and can be presented among the more detailed information offered in the privacy center of the website. This serves to acknowledge consumers' limited capacity for information and to limit the cookie banner to the information required for giving or rejecting consent.

Figure 1: First layer design – without (left) or with (right) choice options for specific purposes of data collection. Source: ConPolicy (2022).



When it comes to the **choice options for consumers**, there are **two possible approaches** for the first layer:

- In the first approach the cookie banner allows consumers to make a **yes/no decision between accepting and rejecting cookies directly on the first layer**, and it directs consumers to a **second layer** when they want to get **more detailed information** and when they want to decide about cookies being installed and data being collected depending on the purpose of data collection. In this case they are asked to click the **“adjust”** button (see *Figure 1*, cookie banner on the left). Additionally, the short explanatory note about the purposes of data processing should be equipped with a **link leading to more detailed explanations**.
- The second approach includes **more detailed choices on the first layer**. It allows consumers to make a **decision related to specific purposes of data collection and to save this selection** directly on the first layer. In order to make sure that consumers correctly understand the meaning of the choice buttons, the “accept all” and “reject all” buttons may be less conspicuous (“greyed out”) once the consumer has started to make specific choices. It should, however, remain possible for the consumer to cancel this selection and to return to the “accept all” and “reject all” choices. If consumers want to get more detailed information about purposes and data processors, they can click on **“more”** in the boxes for specific purposes (see *Figure 1*, cookie banner on the right). Terminology and specifications of the purposes will be explained in detail in section 2 on the second layer (pp. 8).

Both options are viable from the perspective of consumer-friendliness. The option of deferring choice options for specific purposes to the second layer may be advisable in particular for mobile devices, where there is little room and attention for extensive information.

1.4 Choice between “yes” or “no”: Reject options

To allow a fair and balanced choice between consent and rejection, cookie banners should contain an **option to “reject” cookies and tracking technologies equal to the “accept” option** (see *Figure 1*).

The **“reject” option should be designed in a way that makes rejecting as easy as accepting**, usually in the form of a “reject” button in addition to and on the same layer as the “accept” button. The model cookie banner uses the wording “reject all” for this purpose. An alternative wording option could be **“continue with necessary cookies only”**. In this case, the cookie banner should make clear that necessary cookies will be installed and used in all cases regardless of the consumer’s consent.

Many consumers prefer not to interact with the cookie banner at all. This preference is met and the cookie banner is more consumer friendly if it provides an **“X” button in the upper right corner of the box** as a further or additional option for rejecting consent. When consumers click the “X” button, the cookie banner is closed, with the effect that **only necessary cookies are installed**. Where the cookie banner contains an “X” button, this should be clearly visible at the top right, since that is the usual and commonly known location in browsers or other programs to close windows, and consumers are used to that location. Consumers should be informed that by clicking the “X” button, they will continue with necessary cookies only (see *Figure 2*).

Figure 2: Extract from model cookie banner: “X” button. Source: ConPolicy (2022).



1.5 Form and language

Form and language of cookie banners should be **informative, fair and consumer-friendly** and **not be biased or designed to manipulate or mislead consumers**.

Figure 3: Extract from model cookie banner: Balanced use of form and language. Source: ConPolicy (2022).



Therefore, the following design recommendations shall apply to cookie banners:

- **The options of consenting and not consenting should be equally designed and equally present on the same layer** (see *Figure 3*). The choice options can be highlighted by colour, font size or placement, e.g., they can match the corporate colours of the service provider.
- With regard to the “**adjust**” option, there is the possibility of not using it as a button but **presenting it less prominent than the “Accept all” and the “Reject all” button**. The choice option leading to the settings (“adjust”) must however be **easily perceptible for the user and, for this purpose, be clearly distinct and in a clearly separated way from the text in the banner**. This can be done by highlighting it with colour or font size. Ideally the “adjust” option has the same design as the “Reject all” and “Accept all” button.
- **Design and language of the choices should be balanced and neutral, not preferring the “consent” option compared to the “reject” or “adapt” options**. Cookie banners should be developed following ethical standards of humane and consumer-oriented design to avoid manipulative or deceptive effects exploiting for example cognitive and behavioural biases.
- **Wording or visuals in a cookie banner should not be used** in a way that confers **consent to cookies in a highly positive outlook**, making consumers feel good or safe, or **rejection of cookies in a highly negative one**, making consumers feel scared or guilty.
- The **design** (e.g., colour scheme) and wording should be **consistent across all levels** to avoid confusion.

2 When consumers want to know more: Second and third layer

2.1 Opt-in design: Providing for specific consent decisions

In addition to the decision between “yes” or “no” based on an “agree” or “reject” button on the first layer, consumers should have the possibility to **opt-in for each of the purposes** for which the providers intend to collect and process data.

This “opt-in” design can – with a limited depth of information – be part of the first layer design, but in all cases, it should be implemented on the **second and third layer of a cookie banner with detailed information**.

2.2 Default option must be “no consent”

The consumer should have the possibility to make granular and specific consent choices for different purposes of data processing or for different data processors. **The default choice must be always “no consent”, “no opt-in” or “off”**.

Therefore, cookie banners must not contain pre-selected “in”-options, i.e. any boxes or other means to give consent must not be “pre-ticked”.

2.3 Second Layer: Opt-in design for specific purposes

To ensure that **active consent to cookies and data processing is specific according to purposes**, these should be **described specifically**, and consumers should have the possibility to **opt-in for specific purposes** (see Figure 4).

Figure 4: Second layer of a cookie banner with a comprehensive menu of purposes and list of cookies or other tracking technology for each specific purpose. Source: ConPolicy (2022).

By clicking the „X“ you will close the banner and continue with necessary cookies only.

X

Consent to the use of cookies and data processing

- **When using this website, cookies** will be installed that are *necessary* for the performance of the basic functions of the website. For more information on necessary cookies visit the [Privacy Center](#).
- **With your consent** cookies will also be installed for the **purposes listed below**. You can **accept or reject these cookies** and **adjust the settings** individually by ticking the boxes below.
- You can **withdraw given consent any time** by clicking on the button to **“revoke cookie consent”** at the bottom of the webpage.
- For more detailed information click **“more”** in the boxes below or visit the [Privacy Center](#).

Cookies for measuring website performance

These cookies **store information about the way a website is used**, in order for developers to be able to improve website performance. more ▾
(to be supplemented by specifications according to the purposes of the cookies for the respective website)

Cookies for improving functionalities

These cookies adapt features of the website to **user preferences** and aim at enhancing **user convenience**. less ▲
(to be supplemented by specifications according to the purposes of the cookies for the respective website)

Number of cookies set for improving functionalities 17

Cookie A (name of the cookie or other tracking technology)	<input type="checkbox"/>
Purpose (concrete description of the purpose for which the technology is applied)	more ▾
Cookie B (name of the cookie or other tracking technology)	<input type="checkbox"/>
Purpose (concrete description of the purpose for which the technology is applied)	more ▾
Cookie C (name of the cookie or other tracking technology)	<input type="checkbox"/>
Purpose (concrete description of the purpose for which the technology is applied)	more ▾
(... to be continued for other cookies)	

Cookies for personalising online advertisement

These cookies are used to **track users' online behaviour** by creating a **profile of user preferences** for **targeted advertising**. more ▾
(to be supplemented by specifications according to the purposes of the cookies for the respective website)

Accept all

Reject all

Save selection

Description of purposes

Purposes of collecting and processing data should be described in transparent categories with clear and easily understandable wording. There should be a “tick in” box or a “slider button” allowing consumers to actively consent to cookies being set and used for a specific purpose.

Figure 5: Extract from a model cookie banner: Example of choice options for specific purposes with possible supplementary specifications for the respective website. Source: ConPolicy (2022).

The figure displays three distinct sections, each enclosed in a rounded rectangular box with a thin orange border. Each section contains a title, a descriptive paragraph, a toggle switch, and an expandable option (a downward-pointing triangle).
1. **Cookies for measuring website performance**: The text explains that these cookies store information about website usage to improve performance, mentioning load times, browser interactions, and errors. The information is stored in aggregated form. The toggle switch is currently turned off (grey).
2. **Cookies for improving website functionalities**: The text states these cookies adapt features to user preferences for convenience, storing language settings, user names, and text size adjustments. The information is stored in personalised form. The toggle switch is currently turned off (grey). A 'more' link with a downward triangle is visible.
3. **Cookies for personalising online advertisement**: The text describes how these cookies track user behavior to create profiles for targeted advertising, distinguishing between first and third party cookies. The information is stored in personalised form. The toggle switch is currently turned off (grey). A 'more' link with a downward triangle is visible.

Possible **categories of purposes** are “measuring website performance”, “improving website functionalities” and “personalising online advertisement”. Other, more specific sets of categories are also possible, provided that they do not lead to information overload and consent fatigue.

It is important that the explanations are in accordance with the principles of “Form and Language” stated above, especially regarding a neutral and non-biased wording. Furthermore, general explanations of these purposes should be **specified according to the concrete characteristics of the cookies used for a specific website** (see the example in *Figure 5*):

- The description of **cookies for measuring website performance** should include information on how exactly and to what extent the cookies will measure the website performance and to what purposes these measurements are used, and whether the information is stored in a personalised or pseudonymised way.

- For **cookies used for additional website functionalities**, the implemented features should be described, including information on the additional functionalities, and whether the information is stored in a personalised or pseudonymised way.
- For **cookies used for personalising online advertisement**, the information which feeds into the user's profile and the way the profile is used should be described, it should be made clear how the profile is used by advertising networks, and whether the information is stored in a personalised or pseudonymised way.

As described above (section 1.3, p. 4), the cookie banner can optionally inform consumers about the use of cookies which are strictly or technically necessary for using the website, but since consumers cannot opt-in or opt-out of the use of necessary cookies, these should not be a category of the purposes listed with "tick in" boxes.

Further specification of purposes

When consumers want to be informed more specifically about the technical means employed for various purposes, they can get this information by clicking the "more" button in the box for the respective purposes. As a result, they will see the **list of cookies or other tracking methods** used for this purpose with the possibility to opt into the use of these cookies. This list is further explained in the following section on the third layer.

As an option allowing consumers to estimate the relevance of data collection and data processing, the **number of cookies used for a specific purpose** may be indicated (see Figure 6)

Figure 6: Extract from model cookie banner: Optional indication of the number of cookies used for a specific purpose. Source: ConPolicy (2022).

Cookies for improving functionalities

These cookies adapt features of the website to user preferences and aim at enhancing **user convenience**.

(to be supplemented by specifications according to the purposes of the cookies for the respective website)

Number of cookies set for improving functionalities

less ▲

17

2.4 Third layer: Choice options for data controllers and data processors

Figure 7: Third layer of a model cookie banner with detailed information and choice option about each cookie.
Source: ConPolicy (2022).

Cookies for improving functionalities

These cookies adapt features of the website to **user preferences** and aim at enhancing **user convenience**.
(to be supplemented by specifications according to the purposes of the cookies for the respective website)

less ▲

17

Cookie A (name of the cookie or other tracking technology)

Purpose (concrete description of the purpose for which the technology is applied) more ▼

Cookie B (name of the cookie or other tracking technology)

Purpose (concrete description of the purpose for which the technology is applied) less ▲

Technology employed	(Cookies or other equivalent tracking technologies, such as web beacons or browser fingerprinting)
Data controller / Data processor	Name, address and website of - the data controller and - the data processor (if there is a third party which processes personal data on behalf of the controller)
Cookie storage	Time span of cookie storage; time of cookie deletion
Data storage	Time span of data storage; time of data deletion
Data transfer to third parties	Concrete description of third parties to whom data will be transferred;
Data transfer outside the EU	Description of data transfers outside of the EU, if any; description of „safe harbour agreements“, if any.c

Cookie C (name of the cookie or other tracking technology)

Purpose (concrete description of the purpose for which the technology is applied) more ▼

(... to be continued for other cookies)

On a third layer, consumers should have the option to select specific **cookies**. For this purpose, these should be named and described specifically. There should be a “tick in” box or a “slider button” allowing consumers to actively consent to specific cookies or other relevant technologies. The **description** should be **detailed**, and it should contain all necessary information to understand the relevance of data collection for privacy and consumer interests (see the model in *Figure 7*).

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In particular, the description should include:

- the technology employed (cookies, web beacons, browser fingerprinting or other tracking technology tools);
- name, address, and website of the data controller, and, additionally in the case of third-party cookies, name, address and website of the data processor who processes data on behalf of the data controller;
- the time span of cookie storage and the time of cookie deletion;
- the time span of data storage and the time of data deletion;
- concrete description of the transfer of data to third persons, if any;
- concrete description of the transfer of data to countries outside of the European Union, if any; description of equivalent data protection measures, if any.

Another design option could be to introduce an intermediate step in the cookie banner displaying a list of cookie operators or service providers that are installing cookies for a given purpose. In this case a short description of the purpose of the cookie/operator/service should also be given on the second layer equivalent to the option shown in Figure 4. In the next step, however, all cookies or other technologies installed by a cookie operator or service provider, should be made transparent, and consumers should have choice options.

3 What happens after consumers have made their decision? Managing consent over time

3.1 No data collection without consumer interaction with the cookie banner

Cookie banner design – and website technology – must make sure that **no cookies are stored and/or data are collected or processed** if the consumer uses a website **without interacting with the cookie banner**, e.g., by overscrolling the cookie banner or by leaving part of the website covered by the cookie banner.

3.2 Storage of consumer decision on data collection and processing

After the consumer has chosen whether and to what extent to consent to the installation of cookies and to data being collected and processed or not, this **decision should be stored** so that the consumer is not bothered with repeated requests for consent. The consumer may be asked to review the decision at the earliest after six months or in case there have been changes in the cookie policy that require consent to be renewed.

3.3 Reviewing and revoking cookie consent

The website should allow a consumer to **review the cookie settings and revoke consent in a form that is as easy as giving consent**. Ideally an icon indicating these options is always visible at the bottom of the website, staying in one spot as consumers scroll over the website (see the model in *Figure 8*).

By clicking on “**review cookie settings**”, a consumer can access, review and change the individual cookie settings. Clicking on “**revoke cookie consent**” has the same effect as clicking “**reject all**” on the first layer – meaning that no data requiring consent will be collected in the future.

Figure 8: Model for a “review and revoke” window. Source: ConPolicy (2022).



Annex 1: Step-by-step sequence from first to third layer

First Layer

Optional introduction with generic choice

By clicking the „X“ you will close the banner and continue with necessary cookies only. X

Consent to the use of cookies and data processing

- When using this website, cookies will be installed that are **necessary** for the performance of the basic functions of the website. For more information about necessary cookies visit the [Privacy Center](#).
 - With your consent cookies will also be installed in order to
 - measure website performance
 - Improve website functionalities
 - Track your online behaviour for **targeted advertising** purposes.
- You can **accept or reject these cookies** and **adjust the settings** individually by ticking the boxes below.
- You can **withdraw given consent any time** by clicking on the button to **“revoke cookie consent”** at the bottom of the webpage.
 - For more detailed information click **“more”** in the boxes below or visit the [Privacy Center](#).

Accept all

Reject all

Adjust

Consent to the use of cookies and data processing

- When using this website, cookies will be installed that are **necessary** for the performance of the basic functions of the website. For more information about necessary cookies visit the [Privacy Center](#).
- With your consent cookies will also be installed for the **purposes listed below**. You can **accept or reject these cookies** and **adjust the settings** individually by ticking the boxes below.
- You can **withdraw given consent any time** by clicking on the button to **“revoke cookie consent”** at the bottom of the webpage.
- For more detailed information click **“more”** in the boxes below or visit the [Privacy Center](#).

Cookies for measuring website performance

These cookies store information about the way a website is used, in order for developers to be able to improve website performance. (to be supplemented by specifications according to the purposes of the cookies for the respective website)



more ▼

Cookies for improving website functionalities

These cookies adapt features of the website to **user preferences** and enhance user convenience. (to be supplemented by specifications according to the purposes of the cookies for the respective website)



more ▼

Cookies for personalising online advertisement

These cookies are used to **track users' online behaviour** by creating a **profile of user preferences** for targeted advertising. (to be supplemented by specifications according to the purposes of the cookies for the respective website)



more ▼

Accept all

Reject all

Save selection

Second Layer

By clicking the „X“ you will close the banner and continue with necessary cookies only. X

Consent to the use of cookies and data processing

- When using this website, cookies will be installed that are **necessary** for the performance of the basic functions of the website. For more information about necessary cookies visit the [Privacy Center](#).
- With your consent cookies will also be installed for the **purposes listed below**. You can **accept or reject these cookies** and **adjust the settings** individually by ticking the boxes below.
- You can **withdraw given consent any time** by clicking on the button to **“revoke cookie consent”** at the bottom of the webpage.
- For more detailed information click **“more”** in the boxes below or visit the [Privacy Center](#).

Cookies for measuring website performance

These cookies store information about the way a website is used, in order for developers to be able to improve website performance. (to be supplemented by specifications according to the purposes of the cookies for the respective website)



more ▼

Cookies for improving functionalities

These cookies adapt features of the website to **user preferences** and aim at enhancing **user convenience**. (to be supplemented by specifications according to the purposes of the cookies for the respective website)



less ▲

Number of cookies set for improving functionalities

17

Cookie A (name of the cookie or other tracking technology)

Purpose (concrete description of the purpose for which the technology is applied)



more ▼

Cookie B (name of the cookie or other tracking technology)

Purpose (concrete description of the purpose for which the technology is applied)



more ▼

Cookie C (name of the cookie or other tracking technology)

Purpose (concrete description of the purpose for which the technology is applied)



more ▼

(... to be continued for other cookies)

Cookies for personalising online advertisement

These cookies are used to **track users' online behaviour** by creating a **profile of user preferences** for targeted advertising. (to be supplemented by specifications according to the purposes of the cookies for the respective website).



more ▼

Accept all

Reject all

Save selection

Third Layer

Cookies for improving functionalities

These cookies adapt features of the website to **user preferences** and aim at enhancing **user convenience**. (to be supplemented by specifications according to the purposes of the cookies for the respective website)



less ▲

Number of cookies set for improving functionalities

17

Cookie A (name of the cookie or other tracking technology)

Purpose (concrete description of the purpose for which the technology is applied)



more ▼

Cookie B (name of the cookie or other tracking technology)

Purpose (concrete description of the purpose for which the technology is applied)



less ▲

Technology employed (Cookies or other equivalent tracking technologies, such as web beacons or browser fingerprinting)

Data controller / Data processor Name, address and website of
 - the data controller and
 - the data processor (if there is a third party which processes personal data on behalf of the controller)

Cookie storage Time span of cookie storage; time of cookie deletion

Data storage Time span of data storage; time of data deletion

Data transfer to third parties Concrete description of third parties to whom data will be transferred;

Data transfer outside the EU Description of data transfers outside of the EU, if any; description of „safe harbour agreements“, if any.c

Cookie C (name of the cookie or other tracking technology)

Purpose (concrete description of the purpose for which the technology is applied)



more ▼

(... to be continued for other cookies)

Annex 2: Participatory approach and procedural steps within the European Good Practice on Cookie Banner Consent Management

The project involved **stakeholders from businesses** (website providers, online shops, content management system providers and their associations), **civil society** (consumer and digital rights organisations), **academia** and **government authorities**. It was implemented in the context of the Corporate Digital Responsibility Initiative by the German Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection.

1. Participatory approach

The work within the project was divided between the **core team, a subgroup, and the stakeholder group** as a whole:

The **core team** consisted of the ConPolicy Institute and the legal counselling provided by Prof. Dr. Gerald Spindler. It was responsible for managing the process, for providing background information and for drafting the Good Practice Design Guidelines in cooperation with subgroup members. The work of the core team was financially supported by the German Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection.

The **entire stakeholder group** consisted of 28 institutions and the core team. The participating 28 institutions had the following background: There were 14 businesses and business associations, four NGOs, five data protection organisations, four government authorities and one university representative. Here the general principles and draft Good Practice Design Guidelines were discussed, and the members had the chance to give a thorough feedback in order to reach an agreement on the principles.

The **subgroup** consisted of nine members of the stakeholder group and the core team. The participating nine institutions had the following background: There were six businesses and business associations, one NGO, one government authority and one university representative. The subgroup was responsible for developing good practices and for drafting the Good Practice Design Guidelines in cooperation with the core team.

2. Procedural steps

During the project, the **stakeholder group met three times**, and the **subgroup met four times**.

The **kickoff meeting of the stakeholder group** served to develop a common understanding of challenges and opportunities of cookie consent management, and of the project's aims. Also, the kickoff meeting served to outline the further process and to install the subgroup as the working unit of the project. In the subsequent **sessions of the subgroup**, a common understanding of key building blocks of a good practice of cookie consent management was developed, leading to a first set of draft Good Practice Design Guidelines.

These draft Guidelines as well as contested questions were presented to and discussed with the **stakeholder group at its second meeting**. Building on the results of this discussion, a comprehensive set of draft Guidelines was developed in dialogue between the **core team and the subgroup** in the meetings. The resulting draft Good Practice Design Guidelines were presented to the **stakeholder group** and discussed with it at its **third and final meeting**.

This document is the result of these negotiations. The **organisations that support these Guidelines** and intend to implement its principles in practice are listed in the introduction (p. 2 of this document).