SAMPLE REPORT — FICTIONAL DEMONSTRATION

This PDF illustrates ConsentSignals output for a fictional EdTech site (*BrightPath Academy* at `brightpath-academy.demo`). It is **not** legal advice, not a regulatory finding, and not an assessment of any real website. Automated technical indicators for human review only.

ConsentSignals

Child Privacy Compliance Platform

Child Privacy Compliance Audit Report

https://www.brightpath-academy.demo

68/100

CHILD_RISK_SCORE | **Mixed Audience** | P(child) = 0.71

Scan date	17 June 2026 at 14:32 UTC
Report / scan ID	`00000000-0000-4000-8000-000000000001`
Target URL	`https://www.brightpath-academy.demo`
Final URL (after redirects)	`https://www.brightpath-academy.demo/home`
Trackers detected	10
Pre-consent trackers	6
Cookies analysed	8
CMP detected	Cookiebot
Audience classification	Mixed Audience
Regulatory frameworks	GDPR, COPPA 2025, DSA, EU AI Act Art.50, UK AADC, DPC Fundamentals
Report generated by	ConsentSignals (consentsignals.com) — automated audit

Report Integrity (HMAC-SHA-256)
Authentication tag is embedded in PDF document metadata (XMP). Upload this file at https://consentsignals.com/verify to validate integrity.
Public record: https://consentsignals.com/verify/00000000-0000-4000-8000-000000000001
Key ID: 0000000000000000 | Algorithm: HMAC-SHA-256 | Any modification invalidates the tag.

Executive Summary

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Overall privacy risk score: 68/100 (Mixed Audience, P(child)=0.71).
Automated scan of **https://www.brightpath-academy.demo** detected **10** third-party tracker(s) and **8** cookie(s). **6** tracker(s) fired in *both* Accept and Reject browser sessions — a pre-consent technical signal requiring human review. CMP detected: **Cookiebot**. This report provides evidence for DPO and legal review — not a compliance verdict.

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Consent-Differential at a Glance

Eight isolated Playwright sessions per URL: **Accept all**, **Reject / Disagree all**, **Essential-only**, **Analytics-only**, **Withdraw marketing**, **GPC/DNT**, **Returning user** (prior Reject cookies), and a passive baseline. Storage keys, TCF strings, and Google Consent Mode signals are captured per session where available.

Consent Mode Enforcement (Beta) — verdict: BANNER_ONLY

After 15 June 2026, `ad_storage` is the sole gate for GA4→Google Ads. Indicators only — not certification.

- Consent Mode v2 incomplete — missing ad_user_data and/or ad_personalization.
- GPC session left Consent Mode granted — California CCPA opt-out may not reach Google Ads.

TCF 2.3: **review**

Remediation: Enable full Consent Mode v2 in Cookiebot; map Reject and GPC to denied for all four parameters; verify gcs on collect requests after publish.

10	6	6
Accept session third-party domains	Reject session third-party domains	Pre-consent overlap (Accept ∩ Reject)

Consent-dependent (Accept only)	4 domain(s) — fired after acceptance, blocked on reject
Pre-consent (both sessions)	doubleclick.net, connect.facebook.net, analytics.tiktok.com, static.hotjar.com, google-analytics.com, widget.intercom.io
CMP platform	Cookiebot
Granular-leaky (Essential-only)	connect.facebook.net
Marketing-leaky (Analytics-only)	doubleclick.net
Withdrawal-leaky (Accept → revoke → Save)	analytics.tiktok.com

GPC/DNT leaky (Sec-GPC: 1)	google-analytics.com
Returning-user leaky (prior Reject cookies)	static.hotjar.com

Key Metrics

10	6	8	3
Trackers Found	Pre-Consent (Accept ∩ Reject)	Cookies Analysed	Addictive Design Signals

Priority Findings

Highest-severity items for immediate DPO review. Full detail in Tracker Findings.

1. Google Ads / DoubleClick — doubleclick.net

CRITICAL Pre-Consent | RKB: GDPR-5-1-a, GDPR-8, COPPA-312-5

Advertising conversion pixel loaded in both Accept and Reject browser sessions before any CMP interaction completed. Network requests to doubleclick.net were observed on initial page load (pre-consent).

2. Meta Pixel — connect.facebook.net

CRITICAL Pre-Consent | RKB: GDPR-5-1-a, GDPR-8, DSA-28

Meta Pixel script (fbevents.js) executed regardless of consent choice. Sets _fbp first-party cookie and sends page-view events to Meta on homepage load.

3. TikTok Pixel — analytics.tiktok.com

CRITICAL Pre-Consent | RKB: GDPR-5-1-a, GDPR-8, AADC-4

TikTok analytics endpoint contacted in Reject session within 1.2s of page load. Relevant for child-audience properties given mixed-audience classification.

4. Hotjar — static.hotjar.com

HIGH Pre-Consent | RKB: GDPR-5-1-a, GDPR-25, AADC-13

Session recording and heatmap SDK initialised before consent banner dismissal. May capture keystrokes and scroll behaviour of users including minors.

5. Google Analytics 4 — google-analytics.com

HIGH Pre-Consent | RKB: GDPR-5-1-a, GDPR-8

gtag.js loaded and collect requests sent in Reject session. Client ID persisted via _ga cookie with 2-year expiry.

Scan Methodology

Method	Consent-differential crawl (Method I) — eight-session consent matrix (Accept, Reject, Essential-only, Analytics-only, Withdrawal, GPC/DNT, Returning user, passive); set arithmetic on third-party domains, cookies, storage, and TCF signals
Audience model	P(child) four-signal fusion — readability, visual, colour, COPPA §312.2 factors
Regulatory mapping	Deterministic RKB mapper + regex-audited LLM explanations (RKB v1.2.0)
Scoring model	consentsignals-v1
Scan duration	187 seconds
Report generated	2026-07-18 09:45 UTC

⚠ Regulatory Risk Assessment

Qualitative risk bands (financial quantification withheld — indicative only, not a regulatory finding):

Overall	**CRITICAL**
GDPR	**CRITICAL**
COPPA	**CRITICAL**
DSA	**HIGH**

DISCLAIMER: Regulatory risk bands and any financial figures are illustrative indicators only — not predictions of actual enforcement outcomes. Financial amounts are shown only for authenticated scans of your own domain. Actual regulatory action depends on severity, cooperation, turnover, and regulator discretion. This output does not constitute legal advice or an assertion of wrongdoing by any third party.

Tracker Findings

Google Ads / DoubleClick

CRITICAL Pre-Consent

`doubleclick.net`

Category: **Advertising** | Owner: Google LLC (Alphabet Inc.)

Advertising conversion pixel loaded in both Accept and Reject browser sessions before any CMP interaction completed. Network requests to doubleclick.net were observed on initial page load (pre-consent).

GDPR-5-1-a GDPR-8 COPPA-312-5

> **Remediation:** Ensure all tracking technologies are gated behind valid consent before activation. Implement a compliant CMP.

Meta Pixel

CRITICAL Pre-Consent

`connect.facebook.net`

Category: **Advertising** | Owner: Meta Platforms Ireland Ltd (Meta Platforms Inc.)

Meta Pixel script (fbevents.js) executed regardless of consent choice. Sets _fbp first-party cookie and sends page-view events to Meta on homepage load.

GDPR-5-1-a GDPR-8 DSA-28

> **Remediation:** Ensure all tracking technologies are gated behind valid consent before activation. Implement a compliant CMP.

TikTok Pixel

CRITICAL Pre-Consent

`analytics.tiktok.com`

Category: **Advertising** | Owner: TikTok Technology Ltd

TikTok analytics endpoint contacted in Reject session within 1.2s of page load. Relevant for child-audience properties given mixed-audience classification.

GDPR-5-1-a GDPR-8 AADC-4

> **Remediation:** Ensure all tracking technologies are gated behind valid consent before activation. Implement a compliant CMP.

Hotjar

HIGH Pre-Consent

`static.hotjar.com`

Category: **Session Recording** | Owner: Hotjar Ltd

Session recording and heatmap SDK initialised before consent banner dismissal. May capture keystrokes and scroll behaviour of users including minors.

GDPR-5-1-a GDPR-25 AADC-13

> **Remediation:** Ensure all tracking technologies are gated behind valid consent before activation. Implement a compliant CMP.

Google Analytics 4

HIGH Pre-Consent

`google-analytics.com`

Category: **Analytics** | Owner: Google LLC

gtag.js loaded and collect requests sent in Reject session. Client ID persisted via _ga cookie with 2-year expiry.

GDPR-5-1-a GDPR-8

> **Remediation:** Ensure all tracking technologies are gated behind valid consent before activation. Implement a compliant CMP.

Intercom Messenger

HIGH Pre-Consent

`widget.intercom.io`

Category: **Social** | Owner: Intercom R&D Unlimited Company

Live chat widget bootstrapped on homepage; sets intercom-id cookie and loads third-party iframe before CMP records a rejection.

GDPR-5-1-a GDPR-8

> **Remediation:** Ensure all tracking technologies are gated behind valid consent before activation. Implement a compliant CMP.

Google Tag Manager

MEDIUM Consent-Dependent

`googletagmanager.com`

Category: **Analytics** | Owner: Google LLC

GTM container present on all pages. Fires only after Accept in differential test, but container may re-trigger tags configured without consent checks.

GDPR-25

> **Remediation:** Adopt privacy-by-default configuration. Disable all non-essential tracking by default. Enable only on affirmative user action.

Vimeo Player Analytics

MEDIUM Consent-Dependent

`vimeo.com`

Category: **Analytics** | Owner: Vimeo.com Inc.

Embedded lesson video player sends watch-progress events after Accept. Educational content increases child-audience relevance for Art. 8 assessment.

GDPR-8

> **Remediation:** Implement age verification or age estimation. Gate all non-essential data processing on verified parental consent for users under 16.

Stripe.js

LOW Consent-Dependent

`js.stripe.com`

Category: **Functional** | Owner: Stripe Payments Ireland Ltd

Payment SDK loaded on subscription checkout path only; not observed on marketing homepage.

Cloudflare CDN

LOW Consent-Dependent

`cdn.cloudflare.com`

Category: **Functional** | Owner: Cloudflare Inc.

Static asset delivery; no advertising identifiers observed in differential audit.

Consent-Differential Audit

Eight isolated browser sessions were run per URL — Accept, Reject, Essential-only, Analytics-only, Withdraw marketing, GPC/DNT, Returning user, and passive baseline. Trackers active in **both** Accept and Reject fire regardless of user choice (technical signal — human review required). Trackers active only after acceptance are consent-dependent. Withdrawal, GPC, and returning-user leak rows appear when present.

6	4	Yes	Cookiebot
Pre-Consent (A ∩ R)	Consent-Dependent (A \ R)	CMP Detected	CMP Platform

Pre-Consent Trackers (fire regardless of user choice)

⚠ doubleclick.net

⚠ connect.facebook.net

⚠ analytics.tiktok.com

⚠ static.hotjar.com

⚠ google-analytics.com

⚠ widget.intercom.io

Audience Classification — P(child) Analysis

The P(child) classifier fuses four signals to compute the probability that this website is directed to a child audience. A probability above 0.70 indicates child-directed; 0.40–0.70 indicates mixed-audience; below 0.40 indicates general audience.

Signal	Score	Weight	Contribution	Description
Text Readability (FKGL)	0.78	0.25	0.195	Flesch-Kincaid Grade Level of visible page text
Visual Content	0.82	0.25	0.205	Object detection and DOM keyword analysis
Colour Palette	0.74	0.20	0.148	HSV bright-saturated pixel fraction
COPPA Factors (§312.2)	0.65	0.30	0.195	Statutory child-directedness multi-factor test
P(child) — Combined	**0.7100**		Mixed Audience	

COPPA §312.2 Factor Breakdown

Factor	Hit	Weight
Visual Content	✓ Yes	0.15
Child Oriented Activities	✓ Yes	0.2
Animated Characters	✓ Yes	0.1
Child Celebrities	— No	—
Child Friendly Incentives	✓ Yes	—
Directed To Children	— No	—
Actual Knowledge	— No	—

Cookie Analysis

Name	Domain	Expiry	SameSite	HttpOnly	Secure	Purpose	Consent	Risk
`_ga`	`.brightpath-academy.demo`	730 days	Lax	✗	✓	Analytics	Pre Consent	HIGH
`_fbp`	`.brightpath-academy.demo`	90 days	Lax	✗	✓	Advertising	Pre Consent	CRITICAL
`_gid`	`.brightpath-academy.demo`	1 days	Lax	✗	✓	Analytics	Pre Consent	MEDIUM
`CookieConsent`	`www.brightpath-academy.demo`	365 days	Strict	✗	✓	Consent	Unknown	LOW
`_tt_enable_cookie`	`.brightpath-academy.demo`	390 days	—	✗	✓	Advertising	Pre Consent	CRITICAL
`_hjSessionUser_284719`	`.brightpath-academy.demo`	365 days	None	✗	✓	Session Recording	Pre Consent	HIGH
`intercom-id-x7k2`	`.brightpath-academy.demo`	270 days	Lax	✗	✓	Social	Pre Consent	HIGH
`__stripe_mid`	`.brightpath-academy.demo`	365 days	Strict	✗	✓	Functional	Consent Dependent	LOW

Evidence Pack — Regulatory Readiness

Technical indicators from external scan only. Human review required before regulatory submission.

HEAA Age Assurance Readiness (UK)

Score: **42/100** | Band: **HIGH**

Highly effective age assurance — NOT_MET
No age-gate detected on registration; Self-declaration date-of-birth field only

Default privacy settings for minors — PARTIAL
Profile visibility defaults to public in demo account flow

Parental controls documentation — NOT_MET
No parental dashboard link in footer at scan time

Harmful Features Audit (UK June 2026 measures)

Score: **55/100** | Band: **MEDIUM**

Infinite scroll on lesson feed — DETECTED
UK Online Safety — design features that increase time-on-site

Push notification opt-in on first visit — DETECTED
Prompting engagement before age verification

Stranger messaging / live chat — Not detected
June 2026 UK measures on stranger contact

AI companion / romantic chatbot — Not detected
Minimum age 18 for AI companion features

Ireland / EU Digital Wallet Readiness

Score: **28/100** | Band: **LOW**

EUDI / national wallet integration — NOT_DETECTED

Verifiable age credential support — NOT_DETECTED

Privacy-preserving age signal endpoint — NOT_DETECTED

EU Age Assurance (DSA Art. 28 / EUDI Wallet)

Assurance level: **LOW** | Self-declaration only

Date-of-birth text field — Self Declaration
Registration form accepts DOB without verification · DSA Art. 28

No document or wallet check — None
No third-party age verification SDK detected in network log

Technical detection only — does not assess effectiveness of age assurance.

Extended Compliance Analysis

Subprocessor inventory, SDK/mobile signals, dark-pattern heuristics, and extended jurisdiction bands. Technical indicators only — not legal findings.

Extended Jurisdiction Bands

Jurisdiction	Band	Note

AU Online Safety (under-16)	**MEDIUM**	Mixed-audience EdTech with social features — review against AU Social Media Minimum Age Bill.
US state kids privacy codes	**HIGH**	Pre-consent advertising trackers detected; relevant for CA ADCA / COPPA assessment.

Subprocessor & Data-Flow Map

6 processors observed | 4 pre-consent

Processor	Domains	Categories	Pre-consent	Severity
Google (Ads + Analytics)	`doubleclick.net, google-analytics.com`	Advertising, Analytics	Yes	CRITICAL
Meta Platforms	`connect.facebook.net`	Advertising	Yes	CRITICAL
TikTok	`analytics.tiktok.com`	Advertising	Yes	CRITICAL
Hotjar	`static.hotjar.com`	Session Recording	Yes	HIGH
Intercom	`widget.intercom.io`	Social	Yes	HIGH
Cloudflare	`cdn.cloudflare.com`	Functional	No	LOW

Observed third-party domains only — not a complete subprocessor list.

Dark-Pattern Indicators (DFA readiness)

Heuristic score: **38/100** | 2 signal(s)

Reject As Grey Link — MEDIUM

`Cookiebot banner: Reject uses grey text link; Accept uses prominent green button`

Preselected Analytics — HIGH

`Analytics toggle pre-enabled on first layer in Accept path`

Heuristic dark-pattern indicators — human review required.

Regulatory Framework Mapping

The following regulatory provisions were identified as applicable to the findings on this website. All citations are sourced from the ConsentSignals Regulatory Knowledge Base (RKB v1.2.0) — no citations were generated by the language model.

GDPR

Article 5(1)(a) — Principle of Lawfulness, Fairness and Transparency

Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject. Processing of personal data for the purposes of tracking or profiling a data subject requires a lawful basis under Article 6. In the absence of consent or another lawful basis, activation o…

Severity: **Critical**

Article 25 — Data Protection by Design and by Default

The controller shall implement appropriate technical and organisational measures designed to implement data-protection principles in an effective manner and to integrate the necessary safeguards into the processing. The controller shall ensure that by default only personal data which are necessary f…

Severity: **High**

GDPR-K

Article 8 — Conditions Applicable to Child's Consent

Where the child is below the age of 16 years, processing shall be lawful only if and to the extent that consent is given or authorised by the holder of parental responsibility over the child. Member States may provide by law for a lower age for those purposes provided that such lower age is not belo…

Severity: **Critical**

COPPA

16 CFR 312.5 — Parental Consent — Verifiable Consent Required Before Collection

An operator must obtain verifiable parental consent before any collection, use, or disclosure of personal information from children. Personal information includes persistent identifiers that can be used to recognise a user over time or across websites, including cookies and device fingerprints. On a…

Severity: **Critical**

DSA

Article 28 — Online Protection of Minors

Providers of online platforms accessible to minors shall put in place appropriate and proportionate measures to ensure a high level of privacy, safety, and security of minors on their service. The European Commission's Article 28 Implementation Guidelines, published 14 July 2025, clarify that platfo…

Severity: **High**

UK AADC

Standard 4 — Use of Children's Data — Data Minimisation

Only the minimum amount of personal data necessary to provide the elements of the service in which a child is actively and knowingly engaged should be collected. Additional processing of children's personal data for purposes not directly necessary to provide the service, including behavioural advert…

Severity: **High**

Standard 13 — Nudge Techniques — Prohibition on Detrimental Design

Nudge techniques or other design features must not be used to encourage children to provide unnecessary personal data, weaken or turn off their privacy protections, or extend their use of a service in ways that may be detrimental to their health or wellbeing. This standard prohibits infinite scroll,…

Severity: **High**

Recommended Review Actions

Prioritised next steps a DPO or compliance lead might take after reviewing this evidence pack. Not legal advice — adapt to your jurisdiction and counsel guidance.

→ Review all CRITICAL and HIGH pre-consent trackers with your DPO — gate behind CMP or remove.

→ Assess child-audience classification (P(child)=0.71) against GDPR Art. 8 and COPPA parental consent requirements.

→ Document lawful basis for each subprocessor in your ROPA; update privacy notice with observed domains.

→ Test Cookiebot configuration: ensure Reject path blocks all non-essential tags (currently 6 domains leak).

→ Evaluate UK AADC / HEAA readiness — age assurance is self-declaration only in this scan.

→ Re-scan after CMP changes; use ConsentSignals monitoring agent to catch post-deploy drift.

Report Integrity Verification
HMAC-SHA-256 tag stored in document metadata. Key ID: 0000000000000000 | Generated: 2026-07-18 09:45 UTC
Verify online: https://consentsignals.com/verify/00000000-0000-4000-8000-000000000001 | Upload PDF: https://consentsignals.com/verify