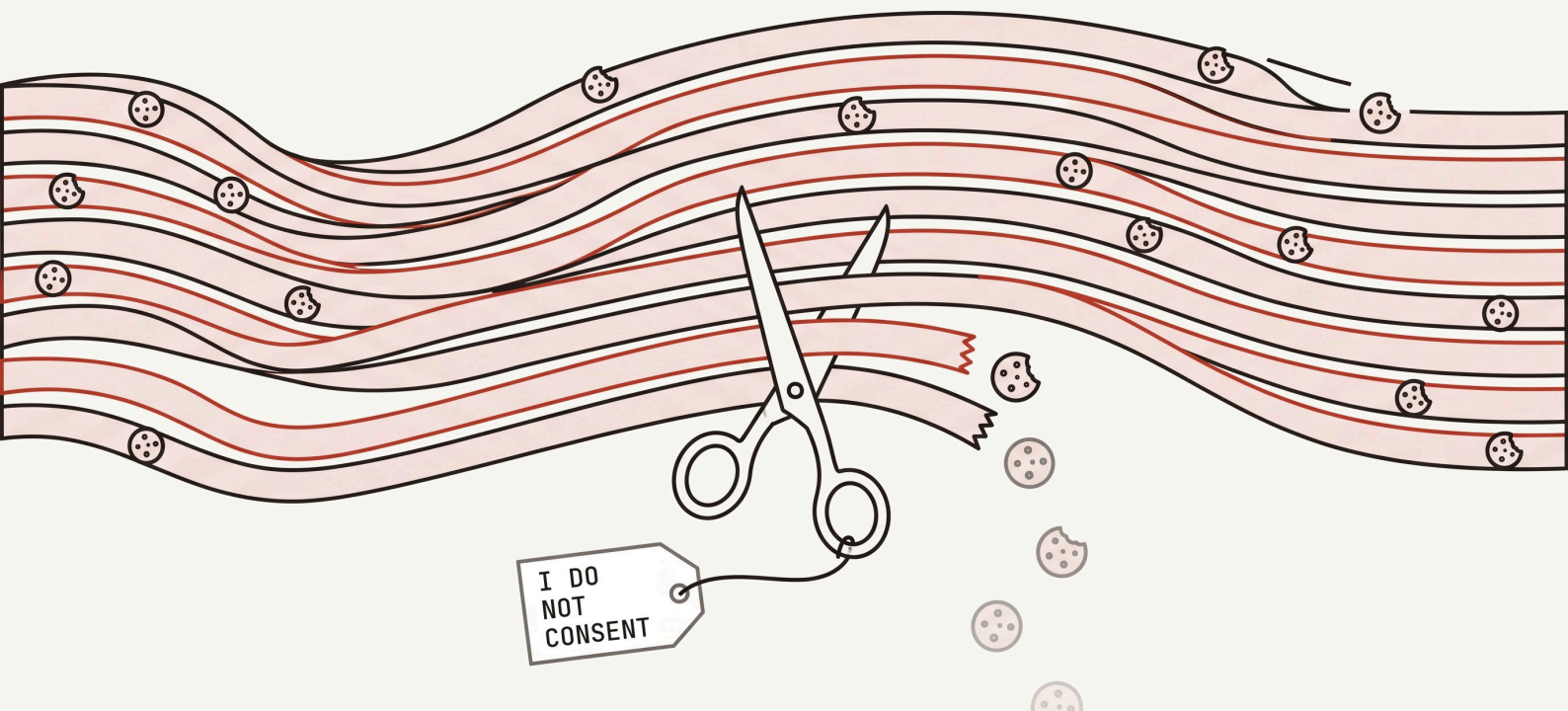


The Cookie **Loophole**

What the “I do not consent” button really switches off
on 50 big websites

Marcin Rybak



OCTOBER 2026

headflash.news/reports/the-cookie-loophole

Text and results: CC BY 4.0. Screenshots and banner quotes belong to the sites
and are reproduced to document the measurement.

TL;DR

In short

In September 2026 I checked, on 50 big websites visible from Poland, what really happens when you click a cookie banner: what “yes” costs, what “no” costs and what is left after a refusal. What I found:

1. **“Yes” always takes one click. “No” depends on where you are.** Every one of the 10 global giants that shows a banner offers refusal on the first screen, and so do 8 of 11 Polish everyday services. Polish news sites: 1 of 10. (chapter 1)
2. **“I do not consent” does not switch off legitimate interest.** On six news sites the list of companies on that basis does not change by a single one after a refusal. On Onet 810 companies stay, on Gazeta.pl 246. A full refusal exists, but on Onet the objection slider sits eight screens down the panel. (chapter 2)
3. **After a refusal the traffic keeps flowing.** On 26 of 39 sites the browser still connects to advertising or analytics companies after a full refusal. On 24 the traffic starts before you click anything. (chapter 3)
4. **Sometimes you pay for “no”.** On WP a refusal ends with the screen “Odrzucam zgody i płacę od 5,75 do 7,50 zł / miesiąc” (“I refuse consent and pay from PLN 5.75 to PLN 7.50 a month”). (chapter 1)
5. **Withdrawing consent is harder than giving it.** On 13 of 42 sites checked in the browser there is no visible place where you can change your decision. (chapter 6)
6. **It can be done differently.** Ten sites leave zero consents and zero legitimate interest after a refusal, among them TVN24, TVP Info, OLX and Allegro. gov.pl and the European Commission’s website offer refusal in one click. (chapters 1 and 2)
7. **The rule that would fix this is stuck.** Article 88b of the Digital Omnibus package would make websites respect a decision set once in the browser. Media are exempt from it, and the media industry still wanted it deleted. Since June 2026 it is struck out in the EU Council texts. (chapter 7)

I do not judge what is lawful. I compare measurements with the law and EDPB guidance. Method and weak points: chapter 9. Data: github.com/martiGIT/ciasteczkowy-wytrych-dane.

This English version is a translation of the Polish original, made with the help of AI. It may contain translation errors. If in doubt, the Polish version is the reference: headflash.news/pl/raporty/ciasteczkowy-wytrych.

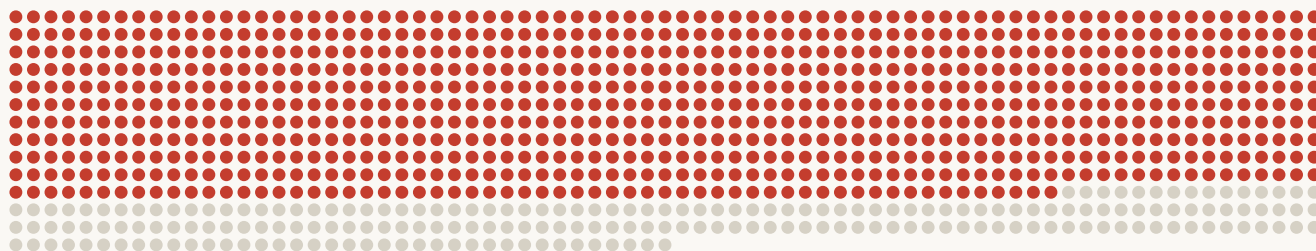
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Introduction

You open Onet, a major Polish news portal. The article underneath is dimmed, and you can't scroll. On top sits a window with two buttons: a yellow "PRZEJDŹ DO SERWISU" ("GO TO THE SITE") and a white "USTAW-
IENIA ZAAWANSOWANE" ("ADVANCED SETTINGS").¹

You don't want to be tracked. You go into the settings and click "NIE WYRAŻAM ZGODY" ("I DO NOT CON-
SENT"). The window disappears. Done... right?



Each dot is one company. In the record of your decision, which the site passes on to its advertising partners, 810 of them, the red ones, still have the green light. After the yellow button they would all have it, 1,013. Your "no" switched off the grey ones... roughly one in five.²

Those 810 companies don't ask for consent. They rely on "legitimate interest". You can object to that, of course, in the same settings... eight screens further down.³

On Gazeta.pl it is even simpler. Before any click: 246 companies. After "NIE WYRAŻAM ZGODY": the same 246, to the last one. After "AKCEPTUJĘ" ("I ACCEPT"): the same 246 plus 424 more.⁴ On that list your refusal changed... nothing.



Gazeta.pl, first screen of the banner: "USTAWIENIA ZAAWANSOWANE" and "AKCEPTUJĘ", second paragraph cut out (dashed line). Browser pass, 2 September 2026.

Brussels has an idea for this. You set your refusal once, in the browser, and websites have to respect it. Sounds good. The European Commission exempted the media from that duty up front.⁵

Media industry organisations wrote to ministers on 5 June 2026 saying that this provision must be rejected and removed.⁶ In June it disappeared from the working texts of the EU Council (France, among others, wanted it removed).⁷

| Why fight a rule that doesn't even apply to you? Exactly...

Where this report comes from

In July I wrote on LinkedIn that a cookie banner doesn't ask for consent, it produces it.⁸ Writing is easy. I decided to check whether it's true, with numbers instead of a hunch.

I took 50 sites. Big Polish portals and shops, banks and everyday services, global platforms, a few foreign sites. Plus reference points: the website of the European Commission (the same one that wrote the draft of the new rules), gov.pl and Wikipedia, which has no ads at all. You'll find the full list with addresses in [Appendix 1](#).

I measured in two ways. First, a browser pass over 42 sites, step by step: an AI agent (Claude in Chrome) clicked and took notes under my supervision, and I checked the results. Then I built an automated counter that went through all 50 sites, three times each.

Everything ran through a Polish internet provider, not from a data centre.⁹ The browser is plain Chrome in Polish, with no blockers and no login, the way an average reader arrives (the only difference: the agent extension). The counter ran separately and did not pretend to be human. Details are in the method chapter.¹⁰

THE COOKIE LOOPHOLE · INTRODUCTION

How a **cookie** works



Simplified diagram.

HeadFlash.news

How a cookie works: a site stores an identifier, the browser sends it back, and a company present on many sites recognises the same browser on each of them. Simplified diagram: this is how Chrome, the browser I measured in, works by default; Safari and Firefox restrict third-party cookies.¹¹ AI-generated graphic, checked by me.

A few gems turned up along the way.

Onet's partner list takes 33 minutes to read. At 200 words a minute, without a coffee break.¹² The WP list is 138 screens of scrolling. At some point the browser tab stopped responding to attempts to take a screenshot... no wonder.¹³

At InPost, the parcel locker company, the refusal button was called “ODRZUĆ WSZYSKO” (“REJECT ALL”) on 2 September. Without the letter T. The accept button next to it? “ZAAKCEPTUJ WSZYSTKO” (“ACCEPT ALL”), spelled flawlessly.¹⁴ I reported it to InPost in a LinkedIn chat and a few days later it was fixed. Quick reaction. Respect.



InPost: “ODRZUĆ WSZYSKO” next to “ZAAKCEPTUJ WSZYSTKO”. Browser pass, 2 September 2026.

In the end an independent agent, Grok (yes, Elon Musk’s), checked everything. It measured the sites from my list on its own, without knowing my results. Nowhere did it get the opposite result. Sometimes a different one (time had passed), but never the opposite.¹⁵

To be fair: I worked with AI a lot on this report. I prepared the assumptions and materials with the model Claude Fable 5.1. Most of the report was written with Claude Opus 5. Fable 5.1 then went through the finished text once more, in a separate, independent session. An agent clicked, a script counted, Grok checked. The infographics and the cover image were generated by Nano Banana, Google’s image generator. I checked every graphic against the data: numbers, dates, names, spelling. The screenshots are real, and the dots in the introduction are drawn by a script from the data. I put my name to it. This English version was translated from Polish with AI (Claude); the Polish original is the reference.

Why am I so fixated on Onet? Statistics. In August 2026, 13.35 million people visited it, 45.44 percent of Polish internet users. The average one spent more than an hour and a quarter there that month.¹⁶ So almost every second internet user in Poland sees the Onet banner.

This is a report by one person, not an academic paper. Nobody paid me for it; I did it with my own money and in my own time. I describe the method and the weak points at the end (yes, there are some), and the results and measurement records are public, [in a repository on GitHub](#).

Chapter 1

How consent is manufactured

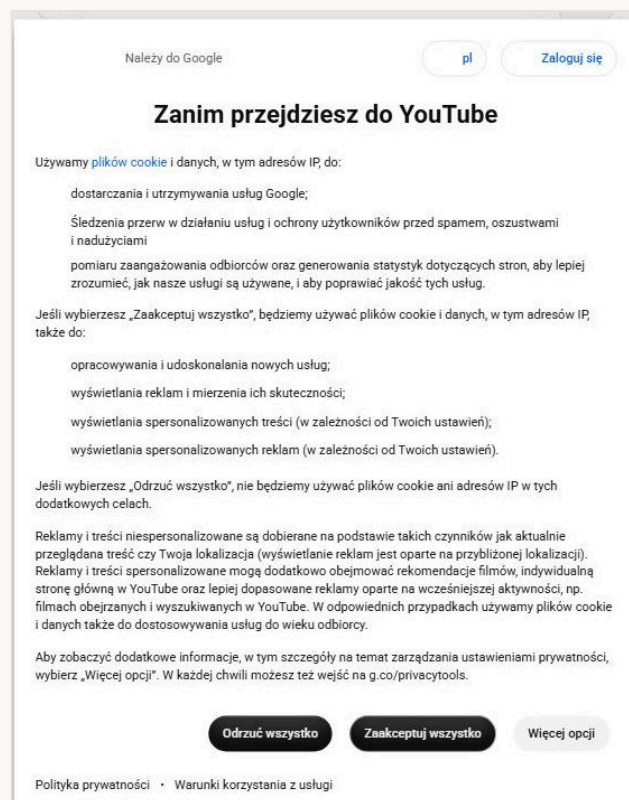
“Yes” costs one click. Always

On every site where the counter measured acceptance, it cost one click. In all three runs. No exceptions.¹⁷

Refusal is another story. It varies, and the variation follows a very clear pattern.

“No” depends on where you are

The global giants? Every one of the ten in my sample that shows a banner at all has a refusal button on the first screen. YouTube: “Odrzuć wszystko” (“Reject all”). Facebook: “Odrzuć opcjonalne pliki cookie” (“Reject optional cookies”). LinkedIn: “Odrzuć” (“Reject”). One click, the same as consent.¹⁸



YouTube: “Odrzuć wszystko” next to “Zaakceptuj wszystko” (“Accept all”), on the first screen. Browser pass, 2 September 2026.

Polish shops, banks and everyday services: similar, 8 out of 11.¹⁹ Lidl: “Odrzuć”. Żabka: “Odrzuć wszystkie” (“Reject all”). mBank: “odrzuć”.

And Polish news sites? I have a result for ten.²⁰ One has refusal on the first screen: rp.pl. And with an asterisk. The button “Nie wyrażam zgody” (“I do not consent”) sits there in a frame of text that has its own scroll bar. Four screens down. The mouse wheel over that frame scrolls... not the frame, but the page behind the banner. The frame itself scrolls so reluctantly that the AI agent clicking for me did not find the button the first time and noted that there was no refusal. I was the one who caught the mistake.²¹

ANDRZEJ WAJDA
Rok jubileuszowy.
100 lat twórcy,
który opowiadał Polskę

NAJBARDZIEJ OPINIOTWÓRCZY TYTUŁ PRASOWY DEKADY

RZECZPOSPOLITA

Wróć do biura
na wysokich obrotach.
Już od 9,90 zł miesięcznie

SERWISY WYDARZENIA EKONOMIA PRAWO PPD DOKUMENTYKA PLUS MINUS KULTURA PADER SHORT e-Wydanie Zaloguj

Redakcja poleca

PRAWO KARNE
Obróńca Piesiewicza: Sąd uznał, że surowa kara nie jest prawdopodobna

PLUS MINUS
Na kłopoty, Zondacrypto. Tusk musiał znaleźć coś, co odwróci uwagę od rządu

PRZEMYSŁ ZBROJENIOWY
Ukraina potrzebuje Patriotów. Kraj, który ma ich wiele, nie może pomóc

SPOŁECZYSTWO
O czym Zaorski rozmawiał z Suszkiem. Nagrania ujawniła „Rzeczpospolita”

PRZESTĘPCZOŚĆ
Z maczetami biegali już od lat. Śledczy mają teorie ws. śmierci kibica Hutnika

POLITYKA
Tusk stał polityce
Sejm wybrał by... Konstytucyjnego o kryptoaktyw...
ujawnił w Sejmie... – fragment zeznań w sprawie Zondacrypto obciążający prawicę. Michał Szuldrzyński i Michał Kolanko otwierają nowy sezon „Politycznych Michałków”.

Szanowny czytelniku

Od 25 maja 2018 roku obowiązuje Rozporządzenie Parlamentu Europejskiego i Rady (UE) 2016/679 z dnia 27 kwietnia 2016 r. (RODO). Potrzebujemy Twojej zgody na przetwarzanie Twoich danych osobowych, w tym przechowywanych odpowiednio w plikach cookies. Poniżej znajdziesz pełny zakres informacji na ten temat.

My i nasi dostawcy (1094) przechowujemy lub uzyskujemy dostęp do informacji na urządzeniu, takich jak unikalne identyfikatory w plikach cookie w celu przetwarzania danych osobowych. Użytkownik może zaakceptować swoje wybory lub zarządzać nimi, klikając poniżej, jak również skorzystać z prawa do sprzeciwu na podstawie prawnie uzasadnionego interesu lub w dowolnym momencie na stronie polityki prywatności. Te wybory będą sygnalizowane naszym dostawcom i nie będą miały wpływu na dane przeglądania.

Dodatkowo, klikając przycisk „Akceptuję”, wyrażasz zgodę na przechowywanie na urządzeniu podobnych do plików cookies technologii do przechowywania i przetwarzania danych osobowych oraz uzyskiwania dostępu do tych danych, takich jak informacje o wizycie na tej stronie internetowej, adresy IP i identyfikatory plików cookie. Zgadzasz się również na przetwarzanie danych osobowych pozostawionych w czasie korzystania z produktów i usług świadczonych drogą elektroniczną w ramach stron internetowych, serwisów i innych funkcjonalności, w tym także informacji oraz innych parametrów zapisywanych w plikach cookies w celach marketingowych, w tym na profilowanie i w celach analitycznych przez Gremi Media SA, podmioty GRUPY KAPITAŁOWEJ i ZAUFANYCH PARTNERÓW oraz dostawców.

Przyjmujesz do wiadomości, że niektórzy dostawcy nie proszą o zgodę na przetwarzanie danych osobowych, powołując się na swój uzasadniony interes związany z prowadzeniem działalności gospodarczej. Zawsze możesz

Ustawienia zaawansowane **Akceptuję**

POLITYKA
„Zbyszek obiecał, że ukręci leb sprawie”. Tusk ujawnił zeznania w aferze Zondacrypto

KONFLIKTY ZBROJNE
Rosyjski dron uderzył w siedzibę SBU. Celem ataku był gabinet szefa Służby

Szadkowska: Czekam na poważany i normalnie pracujący TK, a nie „odbity”

rp.pl, first screen: “Ustawienia zaawansowane” (“Advanced settings”) and “Akceptuję” (“I accept”) are visible; the refusal button lies at the bottom of a scrollable frame of text. Automated counter, 4 September 2026.

The rest make you go into settings. Or, like WP, lead your refusal straight to a price list. On Onet, a full refusal is three clicks and eight screens of scrolling. On rmf24.pl and natemat.pl, four clicks.²²

Words that don’t say “I agree”

On Polish sites the accept button often sounds like a door to the article, not like consent:²³

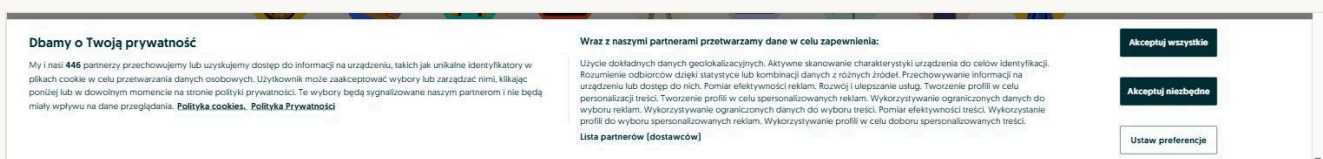
- “Przejdź do serwisu” (“Go to the site”) (Onet, Interia, RMF24)
- “W porządku” (“All right”) (x-kom)
- “Akceptuję i przechodzę do serwisu” (“I accept and go to the site”) (WP, Filmweb, DOZ)
- “Ok, zgadzam się” (“OK, I agree”) (Ceneo)



x-kom: acceptance is called “W porządku”. Browser pass, 2 September 2026.

On Onet, “Przejdź do serwisu” switches consent on for 932 companies. Sounds like an invitation to read. With 932 plus-ones.²⁴

On the other side it’s the reverse. On OLX the refusal button is called “Akceptuj niezbędne” (“Accept necessary”). On Otomoto, “Zezwól tylko na niezbędne” (“Allow only necessary”). You refuse by clicking the word “accept” or “allow”.



OLX: refusal is called “Akceptuj niezbędne”. Browser pass, 2 September 2026.

Then there are the colours. On Onet acceptance is yellow, the brand colour, and settings are white. On rm-f24.pl both buttons are exactly the same size and only the colour tells them apart: solid blue background for “Przejdź do serwisu”, just blue text for settings. On both sites the page behind the banner stays frozen until you decide.²⁵

Anatomy of a banner



- 1 **Acceptance:** big, colourful, no word “consent”
- 2 Refusal hidden in settings
- 3 Page locked until a decision

1 of 10 Polish news sites has refusal on the first screen

A diagram built from real labels, translated, not a screenshot of one site. Measured 2 to 4 September 2026.

HeadFlash.news

Anatomy of a banner: acceptance big and colourful, without the word “consent”, refusal hidden in settings, page locked until a decision. A diagram built from real labels, translated, not a screenshot of one site; 1 of 10 Polish news sites in my sample has refusal on the first screen. Measured 2 to 4 September 2026. AI-generated graphic, checked by me.

A list nobody will read

The banner says who it shares data with. It gives the list, all above board. My counter calculated how long it takes to read it at 200 words a minute.²⁶

SITE	TIME TO READ THE PARTNER LIST
onet.pl	33 minutes
gazeta.pl	28 minutes
wyborcza.pl	22 minutes
x-kom.pl	21 minutes

Formally, everything is right in front of you. In practice, on Onet that is over half an hour of reading before a single article. Hands up if you read it.

The price of “no”

On wp.pl, refusal has a price list.

The refusal button is called “Odrzucam i chcę dowiedzieć się więcej” (“I refuse and want to learn more”). You find out fast. The next screen is “Odrzucam zgody i płacę od 5,75 do 7,50 zł / miesiąc” (“I refuse consents and pay from 5.75 to 7.50 zloty a month”). No back button. The longer path, through settings and switching off every toggle, ends... on exactly the same screen.²⁷

There are two buttons to choose from: “Nadal odrzucam, chcę zapłacić” (“I still refuse, I want to pay”) and “Nie chcę płacić, jednak akceptuję zgody” (“I don’t want to pay, I accept the consents after all”). WP calls this an alternative in the form of a “symbolic subscription”.



WP **Cenimy Twoją prywatność** [Zaloguj](#)

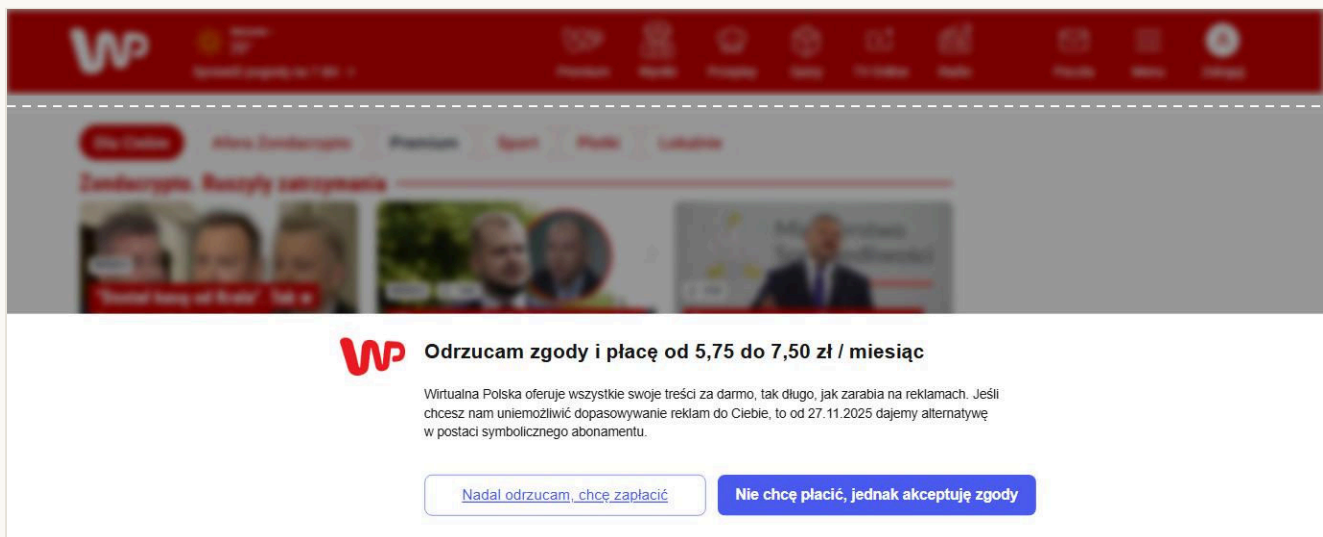
Kliknij **"AKCEPTUJĘ I PRZECHODZĘ DO SERWISU"**, aby wyrazić zgodę na korzystanie w Internecie z technologii automatycznego gromadzenia i wykorzystywania danych oraz na przetwarzanie Twoich danych osobowych przez Wirtualną Polskę (wydawcę tego serwisu), Zaufanych Partnerów IAB (1019 partnerów) oraz pozostałych Zaufanych Partnerów (846 partnerów) a także udostępnienie przez nas ww. Zaufanym Partnerom przypisanych Ci identyfikatorów w celach marketingowych (w tym do zautomatyzowanego dopasowania reklam do Twoich zainteresowań i mierzenia ich skuteczności) i pozostałych, które wskazujemy poniżej.

Możesz również podjąć decyzję w sprawie udzielenia zgody w ramach [ustawień zaawansowanych](#).

Na podstawie udzielonej przez Ciebie zgody Wirtualna Polska, Zaufani Partnerzy IAB

[Odrzucam i chcę dowiedzieć się więcej](#) **Akceptuję i przechodzę do serwisu**

WP, first screen: “Odrzucam i chcę dowiedzieć się więcej”. Browser pass, 2 September 2026.



WP **Odrzucam zgody i płacę od 5,75 do 7,50 zł / miesiąc**

Wirtualna Polska oferuje wszystkie swoje treści za darmo, tak długo, jak zarabia na reklamach. Jeśli chcesz nam uniemożliwić dopasowywanie reklam do Ciebie, to od 27.11.2025 dajemy alternatywę w postaci symbolicznego abonamentu.

[Nadal odrzucam, chcę zapłacić](#) **Nie chcę płacić, jednak akceptuję zgody**

WP after refusal: “Odrzucam zgody i płacę od 5,75 do 7,50 zł / miesiąc”, empty strip above the content cut out (dashed line). Browser pass, 2 September 2026.

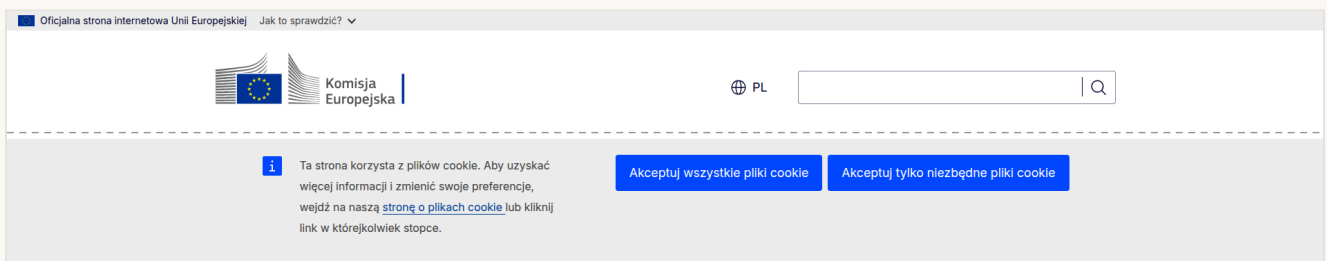
I’ll give WP this: the price is written out plainly. Elsewhere you pay for “no” too, in patience, only nobody prices it.

It can be simpler

gov.pl has three buttons: “Odrzuć”, “Spersonalizuj” (“Personalise”), “Zezwól na wszystkie” (“Allow all”). The European Commission: “Akceptuj wszystkie pliki cookie” (“Accept all cookies”) and “Akceptuj tylko niezbędne pliki cookie” (“Accept only necessary cookies”). Both refusals work with one click.²⁸



gov.pl: “Odrzuć”, “Spersonalizuj”, “Zezwól na wszystkie”, middle of the page cut out (dashed line). Automated counter, 4 September 2026.



European Commission: “Akceptuj wszystkie pliki cookie” and “Akceptuj tylko niezbędne pliki cookie”, middle of the page cut out (dashed line). Automated counter, 4 September 2026.

Three buttons, no riddles. And no 33-minute list.

InPost: a banner you can like

In my view, InPost has one of the most decent banners on my list. Refusal on the first screen, one click, the same as consent. All toggles in settings off by default. The partner list has 16 entries, not a thousand. After refusal the browser doesn’t get a single third-party cookie. And the place where you can change your mind is visible on the page.²⁹

They fixed the typo in the refusal button a few days after my report. Fast, no fuss.

To be fair: the accept button glows yellow, the brand colour, while refusal is grey. And even after a full refusal the browser connects to Google Analytics and Google’s advertising domains.³⁰ So it’s not perfect... but nothing to be ashamed of either.

Worth adding that Allegro comes out cleaner on traffic after refusal.³¹

Chapter 2

Legitimate interest, or the side entrance

The banner asks you for one thing: consent. But GDPR knows six legal bases for processing data, and consent is only one of them. Another one is called “legitimate interest”.³²

The difference is simple. A company has to get consent from you. Legitimate interest it assesses... by itself. At most, you can lodge an objection, if you know where to look for it.

The banners of many big sites run on the advertising industry’s IAB TCF standard (in my sample, every Polish news site uses it). The standard splits what companies do with data into eleven purposes. It allows legitimate interest for six of them. A Polish banner names them like this:³³

PURPOSE	IN PLAIN WORDS
“Wykorzystywanie ograniczonych danych do wyboru reklam” (“Use limited data to select advertising”)	an ad chosen for the page, your approximate location and your type of device
“Pomiar efektywności reklam” (“Measure advertising performance”)	whether the ad reached you and what you did with it
“Pomiar efektywności treści” (“Measure content performance”)	the same, for articles and videos
“Rozumienie odbiorców dzięki statystyce lub kombinacji danych z różnych źródeł” (“Understand audiences through statistics or combinations of data from different sources”)	reports on who the readers are
“Rozwój i ulepszanie usług” (“Develop and improve services”)	your activity as raw material for new products
“Wykorzystywanie ograniczonych danych do wyboru treści” (“Use limited data to select content”)	like the first row, only for content

To be completely fair: since 2023 the standard requires consent for profiles and personalisation. For storing something on your device, such as cookies, it requires consent too. And not every legitimate interest in this table is a stretch. Ad measurement, or an ad matched to the article rather than to you, are purposes where the balancing of interests can come out in the company’s favour.

On paper this looks reasonable. On paper.

i Legitimate interest in plain words

GDPR allows data to be processed without your consent when it is “necessary for the purposes of the legitimate interests pursued by the controller or by a third party”. Unless your interests, rights and freedoms take precedence over them (Art. 6(1)(f)).

Who weighs that? The company itself, first. According to the EDPB, in three steps: is its interest lawful, is the processing really necessary for it, and do your rights not override it.³⁴ You do not have to click anything for this basis to kick in.

What you do have is the right to object (Art. 21). Usually you have to justify it on grounds relating to your particular situation, and the company may carry on if it demonstrates “compelling legitimate grounds for the processing”. In direct marketing the right is at its strongest: you do not have to justify anything, and after an objection, “the personal data shall no longer be processed for such purposes” (Art. 21(3)). And according to the EDPB, personalised advertising can be a form of direct marketing.

You can also lodge an objection automatically, “by automated means using technical specifications” (Art. 21(5)). The end of this chapter is about that.³⁵

After “no”, the list does not budge

My automated counter read the full lists of companies with active legitimate interest. Not a number, but identifiers, company by company. Three times, on 4 September 2026.

i How I know how many companies have the green light

When you click in a banner built on the IAB TCF standard, the site saves your decision in a short string of characters, the so-called TC string. It holds a list of companies from the IAB registry, and for each of them two pieces of information: whether it has your consent and whether it can rely on legitimate interest.

The site passes this string on to its advertising partners. On Onet, for example, you can see it in the addresses of requests to Google’s ad server.³⁶

This string is not a technical detail. In 2024 the CJEU ruled that it is personal data if it can be linked to an identifier, such as the IP address of your device. IAB Europe, the author of the standard, can be a joint controller for its processing. For what websites and advertisers do with the data afterwards, not automatically.³⁷

After each decision, my counter asked the site for this record through the standard TCF interface and counted the companies by identifier. That is a declaration: who has the green light. Whether a company actually received anything is shown only by the network traffic, which is the subject of the next chapter.

On six sites, a refusal leaves exactly the same list of companies on legitimate interest as acceptance does:³⁸

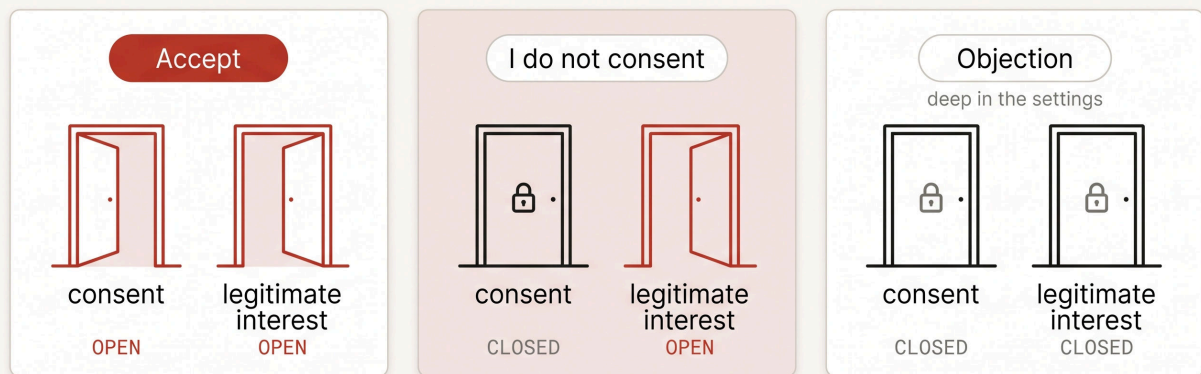
SITE	AFTER ACCEPTING: ALL COMPANIES (CONSENT OR LEGITIMATE INTEREST)	AFTER ACCEPTING: LEGITIMATE INTEREST	AFTER REFUSING
onet.pl	1,013	810	810
rmf24.pl	997	371	371
wp.pl	997	367	367

SITE	AFTER ACCEPTING: ALL COMPANIES (CONSENT OR LEGITIMATE INTEREST)	AFTER ACCEPTING: LEGITIMATE INTEREST	AFTER REFUSING
wyborcza.pl	874	336	336
gazeta.pl	670	246	246
natemat.pl	179	61	61

Look at the last two columns. The same numbers and the same companies, down to the last one. Your “no” does not remove a single company from the legitimate interest list. It only decides whether a second list gets added, the one with consent. That is what makes the difference in the first column.

THE COOKIE LOOPHOLE • CHAPTER 2

Two doors to your data



6 news sites: after “no”, the same list of companies on legitimate interest as after “yes”

Simplified diagram. Automated counter, 4 September 2026, three runs.

HeadFlash.news

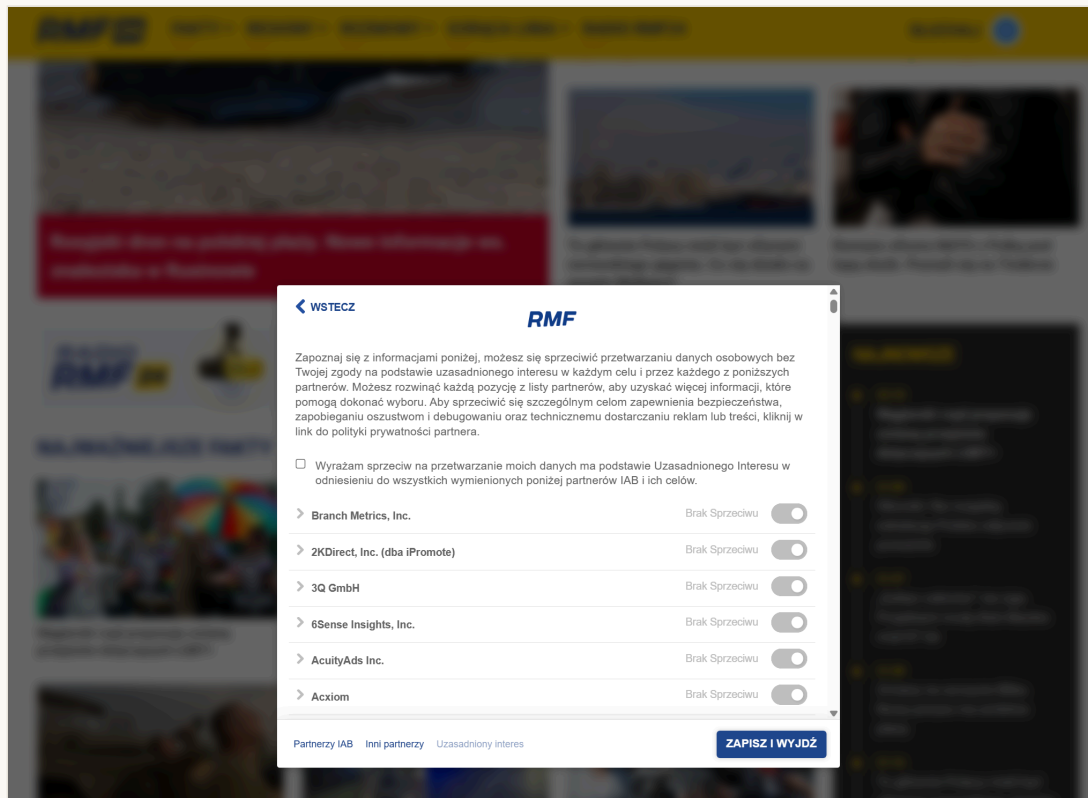
Two doors to your data: “Accept” opens consent and legitimate interest, “I do not consent” closes only consent, and only an objection, deep in the settings, closes both. On 6 news sites, after “no” the same list of companies stays on legitimate interest as after “yes”. Simplified diagram; automated counter, 4 September 2026, three runs. AI-generated graphic, checked by me.

(On wp.pl the reading comes from the paywall screen, because that is where every refusal path ends.)

Who is on Onet’s list? According to the IAB registry, among others Google Advertising Products, Amazon Ads, Microsoft Advertising, TikTok Ad Network, LinkedIn, Criteo and RTB House. Not third-tier firms. And what for? By their own declarations, 296 of them for measuring ads, 251 for developing services, 215 for selecting ads.³⁹

Across the whole study, 815 different companies remain on legitimate interest after a refusal. **Every one of them is active after accepting too.** The same list, just coming in through a different door... the side one.⁴⁰

Some of the doors stand wide open before you click anything. Before the first click, legitimate interest already has 432 companies. On wyborcza.pl 336, on gazeta.pl 246. On rmf24.pl, the “Uzasadniony interes” (“Legitimate interest”) tab holds 363 switches, all set from the start to “Brak Sprzeciwu” (“No Objection”). Who would look there anyway.⁴¹



rmf24.pl, the “Uzasadniony interes” tab in its default state: “Brak Sprzeciwu” next to every partner. Author’s screenshot, 14 September 2026.

For the record: legitimate interest is active before any click on msn.com, filmweb.pl and washingtonpost.com too. There, though, a refusal knocks it down to zero or to a dozen or so companies.

Onet: consent you never gave

On Onet I ran into something I did not see anywhere else in the study.

After a refusal, the record of your decision (the TC string) still contains **consent** for the first purpose: “Przechowywanie informacji na urządzeniu lub dostęp do nich” (“Store and/or access information on a device”). The site passes this record on to its advertising partners. That was the case in all three runs of the counter. It was also the case after a full refusal with an objection, in my browser pass with an AI agent (Claude in Chrome) under my supervision, where I decoded the record independently of the interface.⁴²

The interface: all consents off. The record: storage allowed. Next to it, after a plain refusal, 810 companies on legitimate interest. And storing on the device happens to be exactly the purpose for which TCF does not allow legitimate interest at all.

There is also a separate field for the publisher’s own purposes. On rmf24.pl it holds legitimate interest for, among other things, building profiles and selecting personalised ads. In every state, including after the blanket objection. On Onet it is similar, for content personalisation.⁴³

For these purposes the standard provides for consent only. The specification does not say so explicitly for the publisher field, though, so I do not write that this breaks the standard. I write what is visible: such a record says you did not object.⁴⁴ On rmf24.pl it is there even after clicking “Wyrażam sprzeciw na

przetwarzanie moich danych ma podstawie Uzasadnionego Interesu” (“I object to the processing of my data on the basis of Legitimate Interest”; original spelling, typo “ma” for “na”). The objection covered the partners. The publisher’s own purposes... it did not.

A full refusal exists. You have to find it

On wyborcza.pl the “NIE WYRAŻAM ZGODY” (“I DO NOT CONSENT”) button left 333 companies in my browser pass (the counter read 336 a day later). A full refusal left 18. It took three scrolls deep into the panel and a field: “Zgłaszam sprzeciw wobec prawnie uzasadnionych interesów Zaufanych Partnerów IAB oraz celów opartych na prawnie uzasadnionym interesie” (“I object to the legitimate interests of IAB Trusted Partners and to purposes based on legitimate interest”). My counter did not find that field. A machine did not find it, and you are supposed to?⁴⁵

On rmf24.pl the blanket objection works: 371 companies drop to zero. It costs four clicks and a tab that nothing points to. On natemat.pl also four clicks and a clean zero. On onet.pl the objection slider sits eight screens down the panel.⁴⁶



Onet, settings panel, the “Sprzeciw na UIA Zaufanych Partnerów” (“Objection to the UIA of Trusted Partners”) section: the slider in its default state. Browser pass, 2 September 2026.



The same slider after lodging the objection. Browser pass, 2 September 2026.

On gazeta.pl neither the browser pass nor the counter found an objection.⁴⁷

It can be done differently, within the same standard

Ten sites do it cleanly. After a refusal their record has zero consents and zero legitimate interest. Right after the refusal button: OLX, Otomoto, TVN24, MSN, Lidl, Wykop, Rzeczpospolita, Allegro and TVP Info (here only the automated measurement). naTemat after a full refusal.⁴⁸

The same standard, the same day, the same connection. Where the list stays, it is the publisher's decision. In Fashion ID, back in 2019, the CJEU held that a website that embeds someone else's tool can be responsible for collecting the data and passing it to that tool's provider. For what the provider does with it afterwards, as a rule, not.⁴⁹

What the law says

The European Data Protection Board is working on guidelines on legitimate interest. In its October 2024 draft it writes that for storing on and reading from a device in direct marketing, the appropriate basis will rather be consent, and that usually rules out legitimate interest. It also points out that, according to the EU Court of Justice (CJEU), personalised advertising can be a form of direct marketing.⁵⁰

There is also a second rule, separate from the GDPR. The ePrivacy Directive, in Poland Article 399 of the Electronic Communications Law (PKE), allows storing something on your device or reading it from there only after your consent. Without consent only when it is "necessary" to transmit a communication or to provide a service you asked for yourself. This rule has no legitimate interest.⁵¹ In Planet49 the CJEU added that this protection applies "regardless of whether or not that interference involves personal data".⁵²

After a refusal, Onet records consent to storage on the device that you did not give, and next to it stand 810 companies on legitimate interest. That is hard to reconcile with this reading. (Judging whether something is lawful is the job of the authorities and courts, not mine.)

An objection does not have to be a slider eight screens down. Since 2018, GDPR has allowed it to be lodged "by automated means using technical specifications" (Art. 21(5)).⁵³ In 2023 a court in Berlin held that the Do Not Track signal from a browser was an effective objection against LinkedIn. A first-instance ruling, but it exists.⁵⁴

**The EDPB guidelines and the Berlin ruling: what these documents are**

The European Data Protection Board (EDPB) is an EU body in which the heads of the national data protection authorities sit; for Poland, the president of the Polish data protection authority (UODO). Its guidelines are not a statute, but they show how the authorities that enforce the rules read them.

Guidelines 1/2024 on legitimate interest are the consultation version of 8 October 2024. The consultation closed on 20 November 2024, and I did not find a final version on the EDPB site (as of 14 October 2026). On direct marketing the EDPB writes: “consent will likely constitute the appropriate legal basis both for storing and gaining access to information already stored on the user’s device and for the subsequent processing of personal data, thus normally precluding reliance on Article 6(1)(f) in this context”. In plain words: for storing on the device and the processing that follows, the appropriate basis will rather be consent, which usually rules out legitimate interest.

The Berlin ruling was handed down on 24 August 2023 in the case of the federation of consumer organisations vzbv against LinkedIn. The court held that the Do Not Track signal from a browser is an effective objection. Specifically, it found misleading a LinkedIn message suggesting that the signal has no legal significance and does not have to be respected. This is a first-instance ruling. vzbv marks the ruling as not final, and I found no information on the outcome of an appeal (as of 14 October 2026).

So the legal basis exists. What is missing is a common standard for the signal and a clear obligation for sites to listen to it... and that is exactly what the dispute in Brussels is about.

Chapter 3

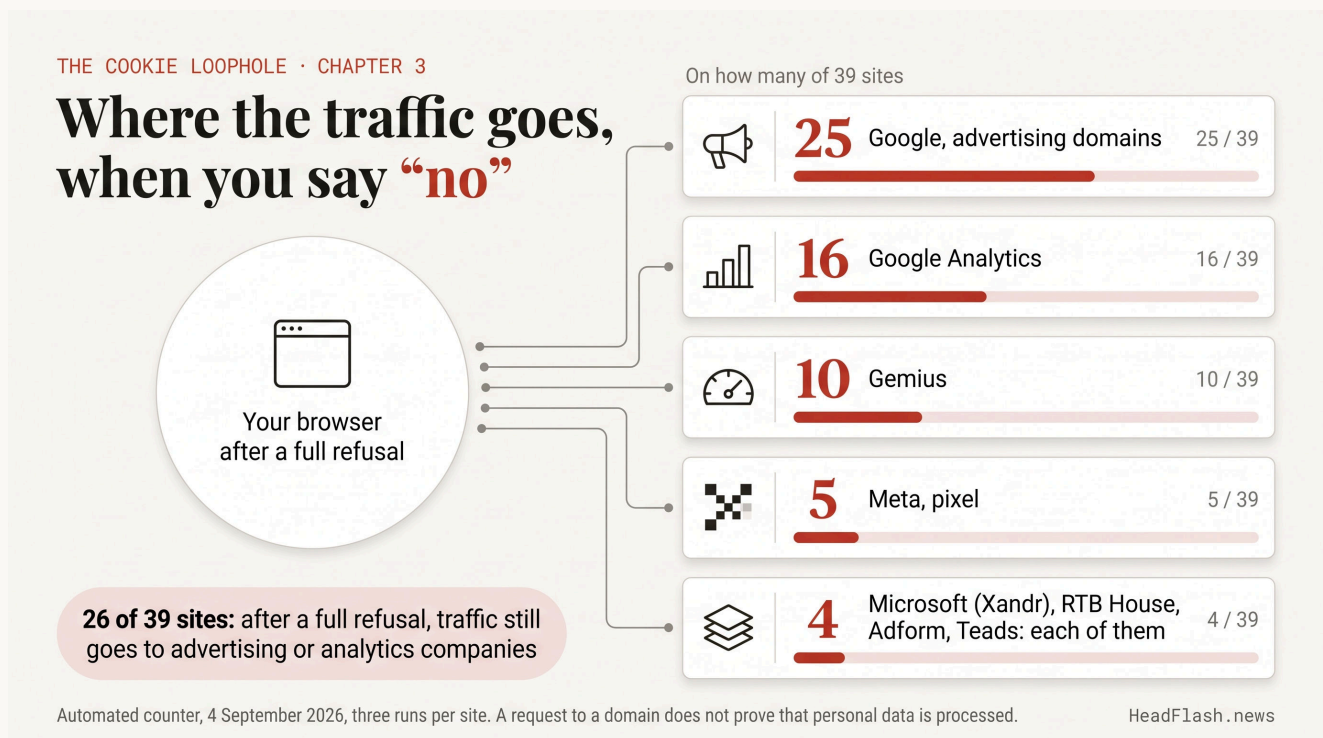
Where the traffic goes when you say no

Chapter 2 was about declarations: who gets a green light in the record of your decision. This one is about what the browser actually did. The counter recorded all network traffic, so you can see where the requests went after a refusal.

I count carefully. Stingily, even. I take only the 39 sites where the counter saw a banner and completed the refusal in all three runs. A company enters the result only if it received traffic in every one of them. And only advertising or measurement domains. No infrastructure, no libraries, no consent platforms themselves.⁵⁵

Mostly to Google

On 26 of 39 sites, traffic still goes to advertising or analytics companies after a full refusal.⁵⁶



Traffic after a full refusal: on how many of the 39 sites the browser still connects to these companies' domains. Automated counter, 4 September 2026, three runs per site. AI-generated graphic, checked by me.

The record holder? wykop.pl: 13 companies, including Adform, Magnite, Meta, Microsoft, OpenX, PubMatic and RTB House. Then rmf24.pl with ten, among them Criteo, RTB House and Taboola. And natemat.pl with seven, including the Meta pixel and Microsoft Clarity.

On 13 sites there is no traffic to such companies after a refusal: YouTube, Facebook, LinkedIn, Netflix, Spotify, ChatGPT, Allegro, Lidl, ING, mBank, IKEA, gov.pl and the European Commission's site.

The record says one thing, the traffic another

Here I have to show honestly that these two measures do not line up. In both directions.

Onet: after a refusal, the record of your decision gives a green light to 810 companies. After a full refusal, traffic goes to three: Gemius (Polish audience measurement), Google Analytics and Google's advertising domains. The list in the record is a declaration. Not proof that every one of these companies receives anything.

Wykop: the reverse. The record of your decision after a refusal is clean, zero consents and zero legitimate interest. And the traffic goes to 13 advertising and analytics companies. A clean record... does not mean the browser stays quiet.

And a caveat, without which this chapter would be dishonest. A request to a domain does not by itself prove that personal data is being processed. From the request you cannot tell whether the ad was profiled. The request may also carry the record of your refusal, as on Onet.⁵⁷ I show where the traffic went. What was done with it, I do not know.



What the network traffic record shows, and what it does not

The counter recorded every request the browser made in the standard HAR format: where it went, when, with what parameters and what the server answered.

So you can see which domains a page connects to and what the request address carries, for example the TC string with your decision in the `gdpr_consent` parameter.

You cannot see what the server did with it on its side: whether it stored anything, whether it built a profile, whether the ad was picked for you.

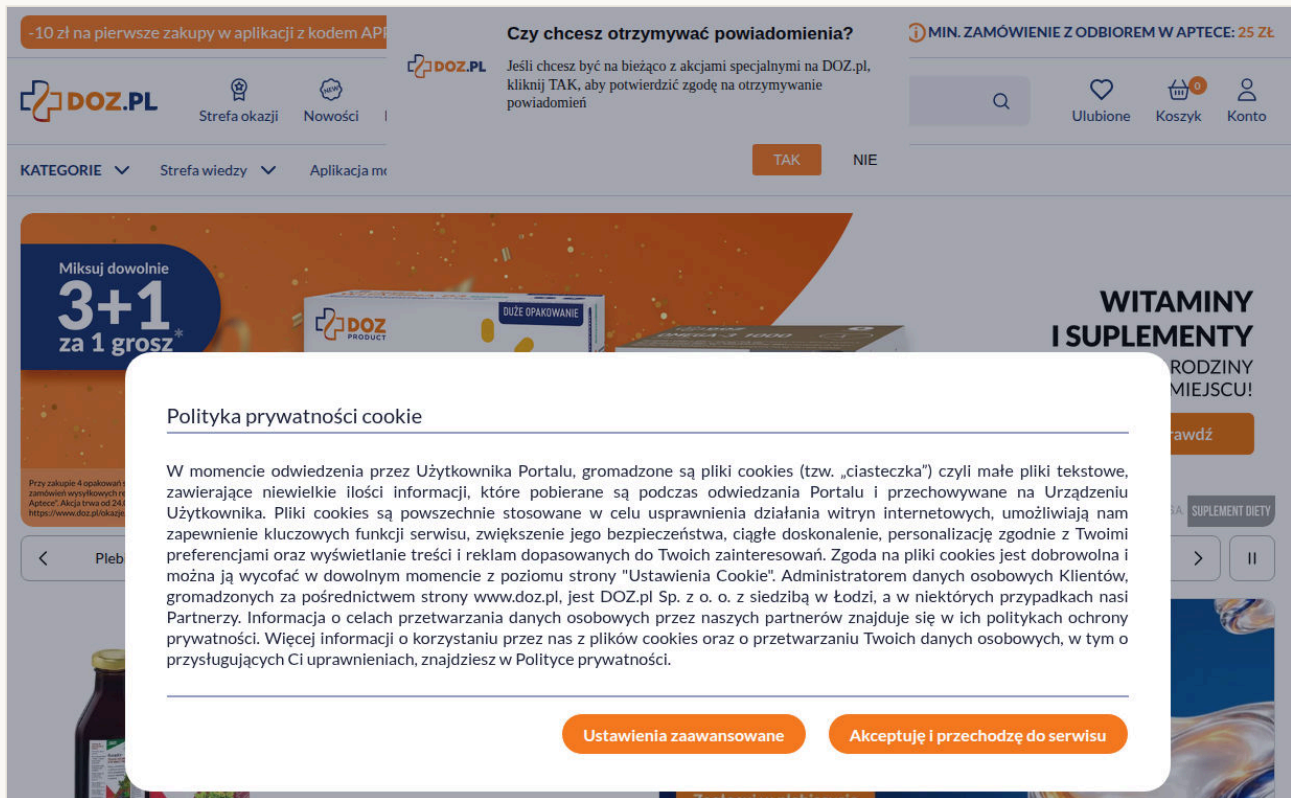
That is why I count carefully: only advertising and analytics domains, only traffic present in all three runs, only sites where the refusal succeeded. The full list of domains with my division into categories is public.

Before you click anything

On 24 of 39 sites, traffic to advertising or analytics companies goes out before the first click in the banner. The banner is still asking, and the traffic is already flowing.⁵⁸

Onet sets the most third-party cookies before a decision: 19. Then msn.com with 14, rmf24.pl with 12, wyborcza.pl with 10.⁵⁹

doz.pl, an online pharmacy. Before any decision, the browser connects to Google Analytics, Gemius and Google's advertising domains. Five identifiers of the Synerise marketing platform sit in the browser. After a full refusal? Exactly the same, in all three runs. The browser pass also showed the full set of Google Analytics cookies before the decision and after the refusal.⁶⁰ The refusal is recorded correctly. It just does not clean up what was there before (at a pharmacy, mind you).



doz.pl before any click: the banner is still asking, and the browser is already connecting to Google Analytics, Gemius and Google's advertising domains. Automated counter, 4 September 2026.

natemat.pl: the record of your decision after a full refusal is clean. And the number of cookies after the refusal grows from 9 to 25. Among the new ones: `_fbp`, the Meta pixel, and `_clck` and `_clsk` from Microsoft Clarity.⁶¹ From two readings I cannot say at which moment they appeared. The end state is unambiguous, though.

One site cleans up

Before the decision, the European Commission's site has Matomo analytics cookies: `_pk_id` and `_pk_ses`. After a click on "Akceptuj tylko niezbędne pliki cookie" ("Accept only necessary cookies") they disappear. One cookie remains, `cck1`, with the record of the decision.⁶²

Among the 50 sites this is the only one where the counter saw analytics cookies set before the decision disappear after a refusal.⁶³ Of all places... the author of the draft rules the whole dispute is about.

Chapter 4

Who benefits

The banner has defenders and opponents. Before I say who is right, I put two things side by side: what each player does in my data and what it says publicly. The last column, what a binding browser signal would change, is my own assessment. Not a measurement.



Article 88b in brief

This is a European Commission draft from 19 November 2025, part of the Digital Omnibus package. It adds a new article to the GDPR.

You set your consent, refusal or objection to direct marketing once. The browser passes it to sites automatically, in a machine-readable form, and sites must respect it.

Sites would have 24 months from the rules entering into force. Large browsers (not small and medium-sized firms) would have 48 months to add such a switch. Common technical standards are to be developed as well.

The obligation does not apply to media service providers when they provide a media service. And banners will not disappear entirely, as the Commission itself admits.

As of 14 September 2026: in the EU Council compromise text of 18 June 2026 Article 88b is deleted in full, and work in the European Parliament continues.⁶⁴

WHO	WHAT MY MEASUREMENT SHOWED	WHAT IT SAYS PUBLICLY	WHAT THE SIGNAL WOULD CHANGE (MY ASSESSMENT)
News publishers	On Onet, accepting switches on consent for 932 companies, on WP and RMF24 for 935. ⁶⁵ On six news sites, refusing does not change the legitimate interest list by a single company.	Media industry organisations: reject and delete Article 88b, no impact assessment. ⁶⁶	Formally it does not apply to them, because the draft exempts the media. But... see below.
Advertising industry (IAB)	After a refusal, 815 companies from the IAB registry remain under legitimate interest.	IAB Europe: delete, “legally flawed, technically unworkable, and economically harmful”. IAB Polska: delete, because browsers would become “new digital gatekeepers”. ⁶⁷	A direct hit: according to the EDPB and EDPS the obligation would apply to anyone who stores anything on the device, including third-party cookie providers. ⁶⁸
Google	YouTube: zero third-party cookies, refusal in one click. After a full refusal, Google’s advertising domains receive traffic from 25 of the 39 sites where the refusal succeeded. ⁶⁹	Commissioned a report according to which the signal will cut consents by 60 to 65 percent and take 40 to 50 billion euros of advertising revenue from companies. ⁷⁰	Plays two roles. Loses as an advertising market on other people’s sites. As the owner of Chrome, which has 61 percent of the market in Poland, it may gain influence over how the signal works. ⁷¹
Meta	Facebook: zero third-party cookies, refusal in one click.	I did not find Meta’s position on Article 88b.	Little on its own services. On other people’s sites it loses measurement, like Google.

WHO	WHAT MY MEASUREMENT SHOWED	WHAT IT SAYS PUBLICLY	WHAT THE SIGNAL WOULD CHANGE (MY ASSESSMENT)
Banks and shops	ING, Alior and mBank have no consent platform, zero third-party cookies after a refusal. Lidl has 6 companies on the list, and Allegro, which I count with the media, 9. Refusal in one click on 8 of 11 sites in this group. ⁷²	I found no public positions.	Little, because they already ask plainly.
Banner providers	OneTrust serves 14 of the 50 sites in the sample. ⁷³	I found no positions from OneTrust, Didomi or User-centrics.	There would be fewer banners, though according to the Commission itself they will not disappear entirely. ⁷⁴
User	“Yes” costs one click. A full “no” costs up to four clicks and eight screens. Onet’s partner list is 33 minutes of reading.	On the user’s behalf, consumer organisations (BEUC) and data protection bodies (EDPB and EDPS) support the signal. ⁷⁵	One decision, made once, at leisure. But in the draft, for sites only two years after entry into force, and without the media.

Why the media fight a rule that does not apply to them

Now comes my interpretation. I label it as interpretation.

The exception in Article 88b protects “media service providers”. That is, the publisher. But the European Data Protection Board and the European Data Protection Supervisor say two things. First: they read the duty to honour the signal as a duty of anyone who stores data on a device, including third-party cookie providers. Second: advertising data processing on media sites is “most often not conducted by the media service provider alone”, but together with third parties.⁷⁶

Now put that next to my data. On Onet, 810 companies remain after a refusal, on rmf24.pl 371, on wp.pl 367. These are not publishers. They are their partners.

An exception that protects the publisher but not its partners gives the publisher... little. That is how I read the determination with which the media industry wants to delete a rule that formally does not cover it. I may be wrong about the intentions. The numbers at least show who this dispute is about.

What follows

The divide does not run between Poland and the rest of the world, or between big and small. It runs along how each one earns money.

Whoever sells advertising through hundreds of intermediaries needs a banner that produces consent. And legitimate interest in case of refusal. Whoever earns from something else (a bank, a retail chain, a subscription service like Netflix) asks plainly and loses little.

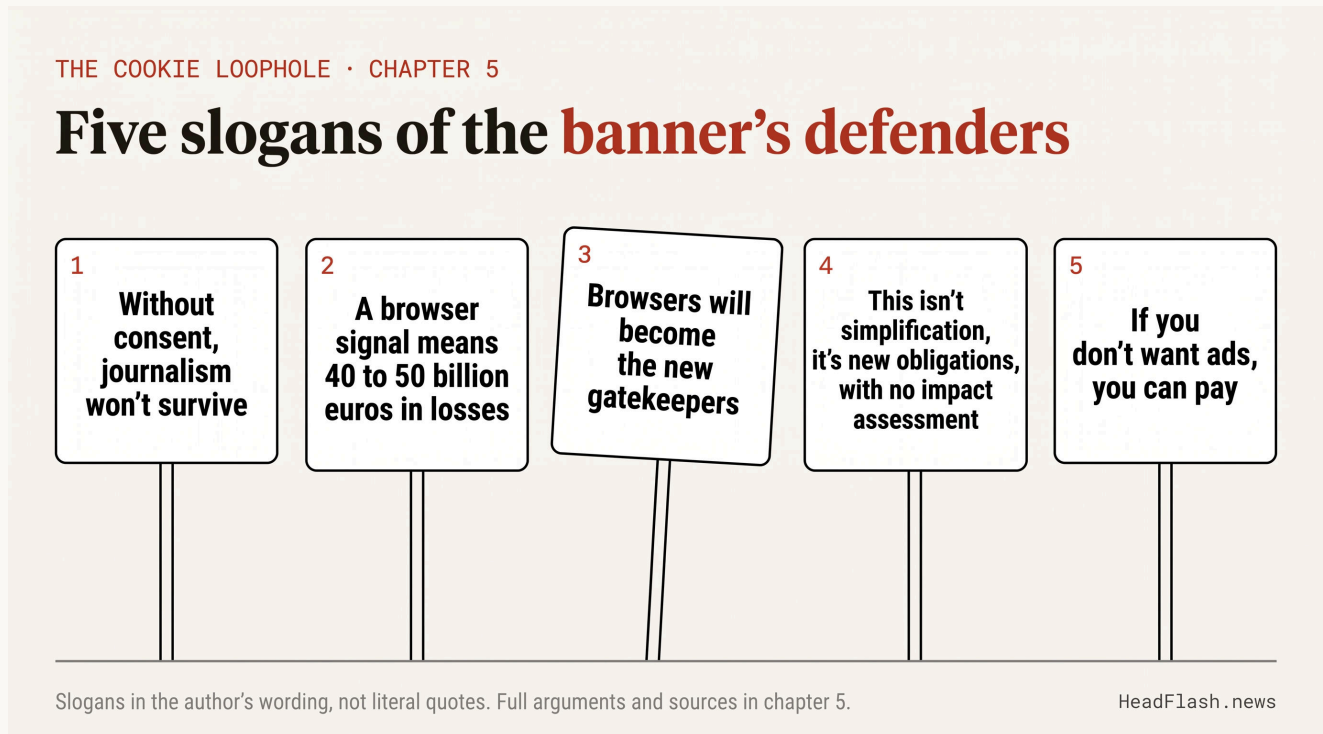
One more thing in fairness. Google and Meta do not need hundreds of intermediaries, because they are the advertising market themselves. Zero third-party cookies on YouTube does not mean less data. It means a different model.

Governments are divided as well. According to noyb, Germany, France and Poland wanted Article 88b deleted. In June the provision disappeared from the Council’s working texts.⁷⁷ I did not find the Polish ministry’s position.

Chapter 5

The strongest arguments of the banner's defenders

The defenders of the consent banner are neither stupid nor evil. They have arguments, and some of them are serious. I picked the strongest ones I could find in their own documents. To each I add what my data says.



Five slogans of the banner's defenders, in my paraphrase, not literal quotes. Each has its own section in this chapter with the full argument, the source and my answer. AI-generated graphic, checked by me.

“Without consent, journalism won't survive”

In 2019 Google switched off third-party cookies for a random share of users. For the 500 largest publishers, revenue from those users fell by 52 percent on average.⁷⁸

That is a serious number and I don't intend to wave it away. But two things need saying about it. The test switched off third-party cookies. It did not ask people what they thought. And it was run by Google, which makes money on these ads (that doesn't invalidate the result, but it's worth remembering who did the counting).

And in my sample there are media sites that let you refuse cleanly... and are still in business. After a refusal, TVN24 and TVP Info have zero consents and zero legitimate interest. After acceptance they have 161 and 121 partners.⁷⁹ You can have ad partners and a clean refusal at the same time.

On top of that, the Commission's own proposal exempts media from the obligation to honour the signal, and provides an exception from consent for audience measurement carried out by a media service provider.⁸⁰

“A browser signal means 40 to 50 billion euros in losses”

This figure comes from a report by Implement Consulting Group. According to it, the signal will cut consents by 60 to 65 percent.⁸¹

Three reservations. Google commissioned the report. It did not measure the drop in consents for browsers, it carried the figure over from data on iPhone apps. And the 40 to 50 billion is advertisers' revenue, not publishers'.



Google's test and the Implement report: what they actually measured

Google's test from 2019: from May to August Google switched off third-party cookies for a random share of users, in the programmatic ads it sells itself. For the 500 largest publishers, revenue from that group fell by 52 percent on average, and the median fall was 64 percent. It is a measurement of revenue after cutting off cookies, not a question put to people about consent.

The Implement Consulting Group report of 24 March 2026 was commissioned by Google. The report itself did not measure the 60 to 65 percent drop in consents. It carried it over from studies done after Apple introduced its App Tracking Transparency mechanism on iPhones, in seven EU countries, Poland among them. According to the report, the 40 to 50 billion euros is “money businesses make from ads (advertiser revenue)”, that is, advertisers' revenue, not publishers'.

What makes me wonder most about this number is something else. If one question, asked once, calmly, wipes out almost two thirds of consents, how many of today's consents are really consent? That is my own judgement. But research shows how much the result depends on the form. In one experiment, among customers who made a choice at all, the same shop got 83.55 percent consent when the boxes were pre-ticked, and 0.16 percent when they were not.⁸²



The Utz study: where 83.55 and 0.16 percent come from

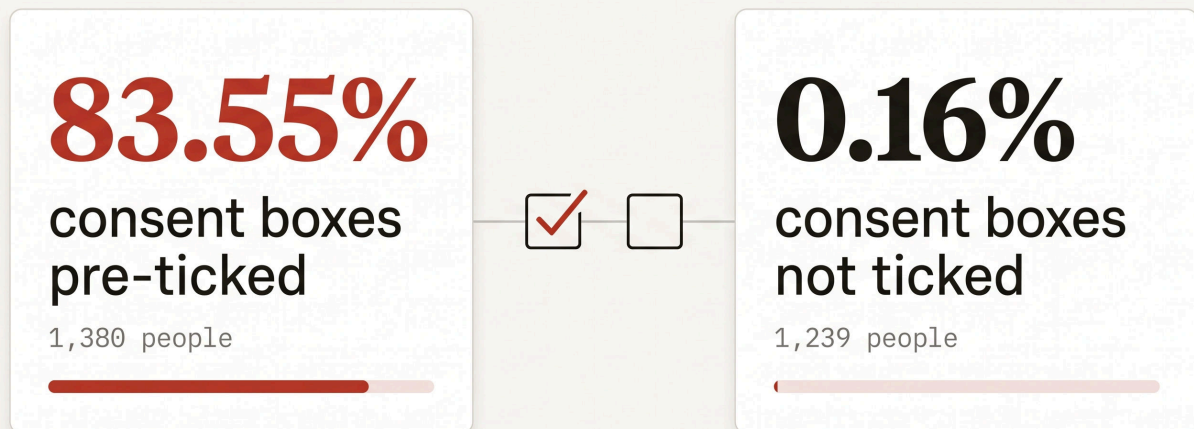
The study by five authors (Utz, Degeling, Fahl, Schaub, Holz) was published at the ACM CCS conference in 2019. The experiment ran on a German online shop. Each visitor saw only one variant of the banner.

In the variant with consent categories, only people who made a decision were counted. When the boxes were pre-ticked, 83.55 percent of 1,380 people accepted. When they were not ticked, 0.16 percent of 1,239 people did.

Same shop, same banner. The difference was one default setting.

THE COOKIE LOOPHOLE • CHAPTER 5

One default setting



Utz et al., ACM CCS 2019: category banner on a German online shop, among people who made a decision. Each visitor saw one variant.

HeadFlash.news

One default setting: when the consent boxes were pre-ticked, 83.55 percent of 1,380 people agreed; when they were not, 0.16 percent of 1,239 people. Utz et al., ACM CCS 2019: banner with categories on a German online shop, among people who made a decision; each visitor saw one variant. AI-generated graphic, checked by me.

“Browsers will become the new gatekeepers”

IAB Polska writes that a browser signal will hand power over consent to a few companies, because most people use a few browsers.⁸³

I consider this the most serious argument. Chrome has 61 percent of the market in Poland and belongs to Google.⁸⁴ Whoever designs the switch and its default setting has real influence over billions of euros. Yes, it's the same Google that commissioned the report on losses.

The Commission answers with standards: the obligation is to come with a common standard, so that sites and browsers speak the same language.⁸⁵ Will that be enough? We'll see. Both sides are partly right here, so this dispute deserves an honest argument.

“This isn't simplification, it's new obligations, with no impact assessment”

Media organisations write that the Omnibus was meant to simplify, yet adds requirements, and that Article 88b needs an “impact assessment”.⁸⁶ IAB Europe adds that the real cause of banners is that the law requires consent for almost every cookie.⁸⁷

I agree that the current rules are over-engineered. But the industry's proposal is to ask for consent less often, not to make the question simpler. And my data shows what already happens today when legitimate interest steps in instead of consent: the list of companies after “no” stays the same as after “yes”.

“If you don’t want ads, you can pay”

WP gives you a choice: consent, or from PLN 5.75 to PLN 7.50 a month. That deserves credit, the price is written out plainly.

For large platforms, the European Data Protection Board (EDPB) found that “consent or pay” alone will in most cases not produce valid consent, and recommended seriously considering a third, free option without behavioural advertising.⁸⁸ The European Commission fined Meta 200 million euros for not offering a version of the service that uses less data.⁸⁹

To be fair: both decisions concern large platforms, not WP. But they show the direction European regulators are heading in.

There is also a voice on WP’s side. In *Meta v Bundeskartellamt* in 2023 the CJEU wrote that users who do not agree to processing not necessary for the service are to be offered “an equivalent alternative”, “if necessary for an appropriate fee”. The court was talking about the terms of a social network, not about banners. But it did not rule out the fee itself.⁹⁰



“Consent or pay”: what the regulators found

In opinion 08/2024 of 17 April 2024 the EDPB looked at large online platforms. It found that the “consent or pay” model will “in most cases” not meet the requirements for valid consent. The free alternative “should be without behavioural advertising”, that is, advertising based on tracking behaviour.

In April 2025 the European Commission fined Meta 200 million euros under the Digital Markets Act (DMA). The reason: Meta did not offer a choice of a service that uses less personal data.

Both decisions concern large platforms. They do not directly cover Polish publishers.

What is left after this conversation

Of the five arguments, I find one truly strong: whoever controls the browser controls the signal. The others mostly talk about how much the industry will lose when consent stops being... manufactured.

None of them answers the question from Chapter 2. Why does the same list of companies remain after “no” as after “yes”?

Chapter 6

Consent in one click, withdrawal for later

The GDPR says it in one sentence: “It shall be as easy to withdraw as to give consent.”⁹¹

Giving consent costs one click. That part is settled. So I checked the way back: after the decision, can you see a place on the page where you change your mind?



GDPR Article 7(3) in full

“The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent.”

In plain words: you can always change your mind. Withdrawal works from that moment on, not backwards. And the way back is meant to be as short as the way in.

I only checked what is visible without logging in: a permanent link, an icon or an entry in the page footer.

On 13 of the 42 sites I went through in the browser, there is no such place. They are Onet, WP, rmf24.pl, rp.pl, natemat.pl, Filmweb, Ceneo, x-kom, MSN, YouTube, ChatGPT, TikTok and Reddit.⁹²

Some of them promise that place. In the banner itself. And withdrawing consent, let me remind you, is supposed to be **as easy** as giving it.

The bottom of a page with no bottom

MSN writes in its banner: “You can change your choice or withdraw your consent in the ‘Zarządzaj preferencjami’ (‘Manage preferences’) area at the bottom of this page”.

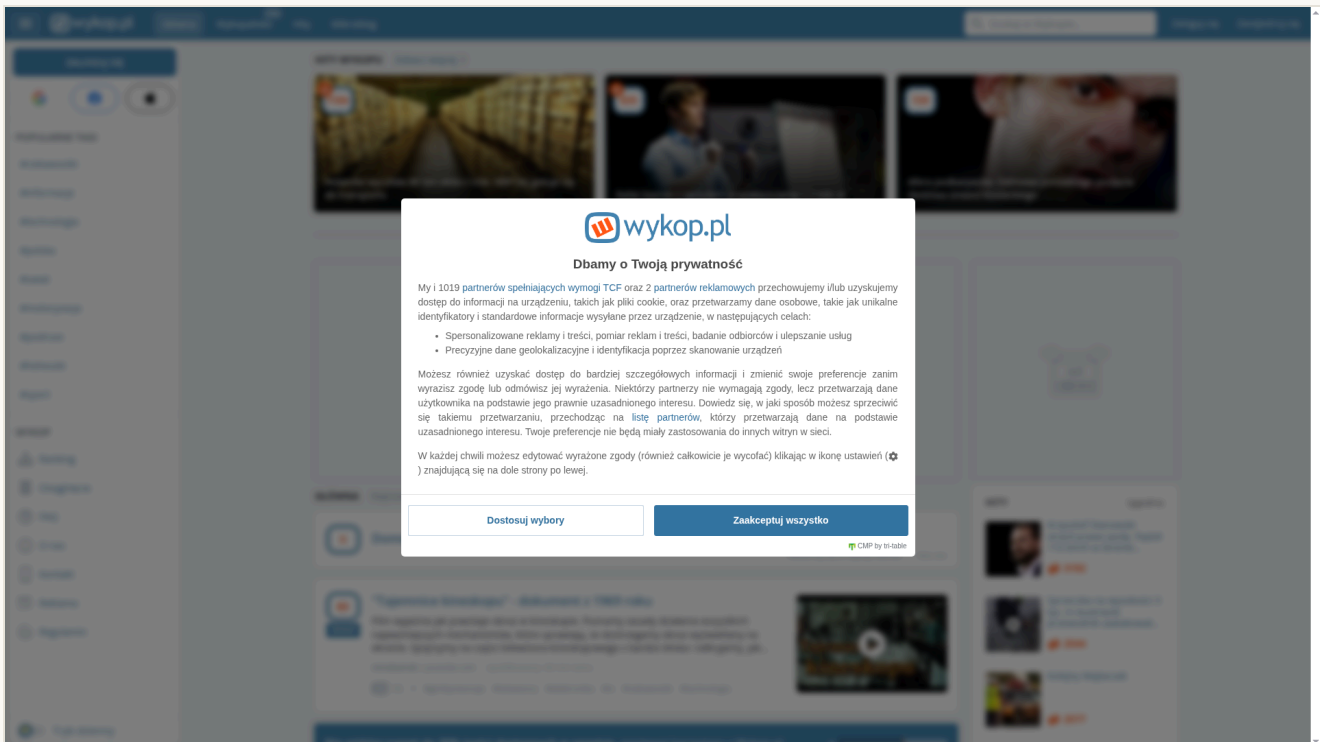


MSN: changing your choice “in the ‘Zarządzaj preferencjami’ area at the bottom of this page”. Browser pass, 2 September 2026.

The problem is that the MSN home page is an endless stream. The further you scroll, the longer it gets. At the start it is 1,000 pixels tall, after three scrolls 1,868, and it keeps growing. There is no bottom. And a scan of the whole loaded page finds not a single link containing the words “preferencje” (preferences), “cookie” or “ciasteczka” (cookies).⁹³

The icon that isn't there

Wykop writes: “You can edit the consents you have given at any time (also withdraw them completely) by clicking the settings icon [...] at the bottom of the page on the left”.



Wykop: the banner points to a settings icon “at the bottom of the page on the left”. Automated counter, 4 September 2026.

At the bottom of the left column there is no settings icon at all. There are Ranking, Osiągnięcia (“Achievements”), FAQ, O nas (“About us”), Kontakt (“Contact”), Reklama (“Advertising”) and Regulamin (“Terms”). The way into the consent settings exists, but it is called “Ustawienia prywatności” (“Privacy settings”), it is a plain text link and it sits in the footer of the **right** column.⁹⁴ So the instruction in the banner sends you to the wrong side of the screen... for an icon that doesn't exist.

The tab you can't see

Filmweb points to “the Ustawienia prywatności tab on our site”. On the home page, scrolled to the very end, the only link like that is “Polityka prywatności” (“Privacy policy”). Maybe the tab appears after you log in (I didn't check that, I went through all the sites without logging in).⁹⁵

Changing your mind? Here is the same request

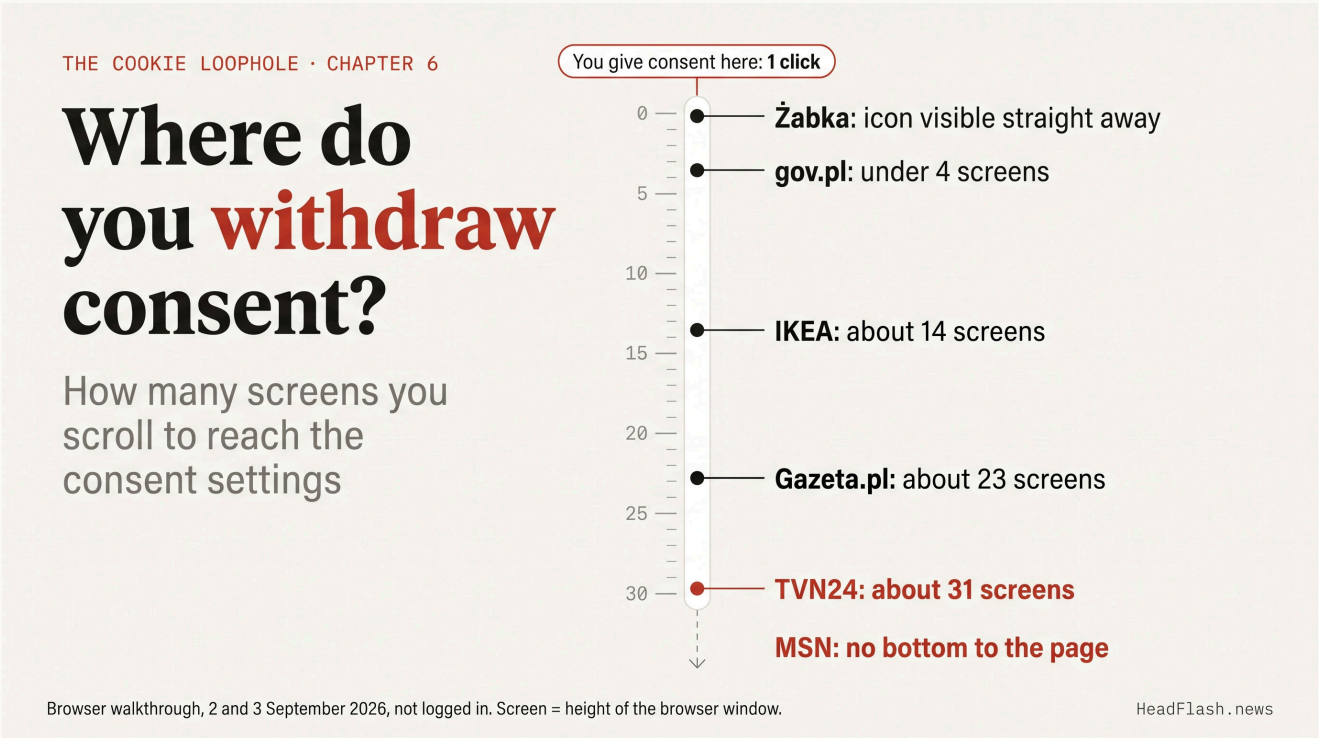
Interia has a link in its footer: “Ustawienia preferencji.” (“Preference settings”). Only it doesn't open your settings. It reopens the first screen of the banner, with the same “Drogi Użytkowniku” (“Dear User”) and the same buttons as on your first visit.⁹⁶ Want to change your decision? You get... the consent request again.

The entry exists, just far away

Where an entry to the consent settings does exist, it can be at the very end of a very long page. Position of the link from the top of the page:

SITE	WHERE THE ENTRY IS
tvn24.pl	30,194 pixels, about 31 screens down
bild.de	27,770 pixels, about 28 screens
interia.pl	23,211 pixels, about 24 screens
gazeta.pl	22,686 pixels, about 23 screens
ikea.com	13,585 pixels, about 14 screens
washingtonpost.com	13,163 pixels, about 13 screens

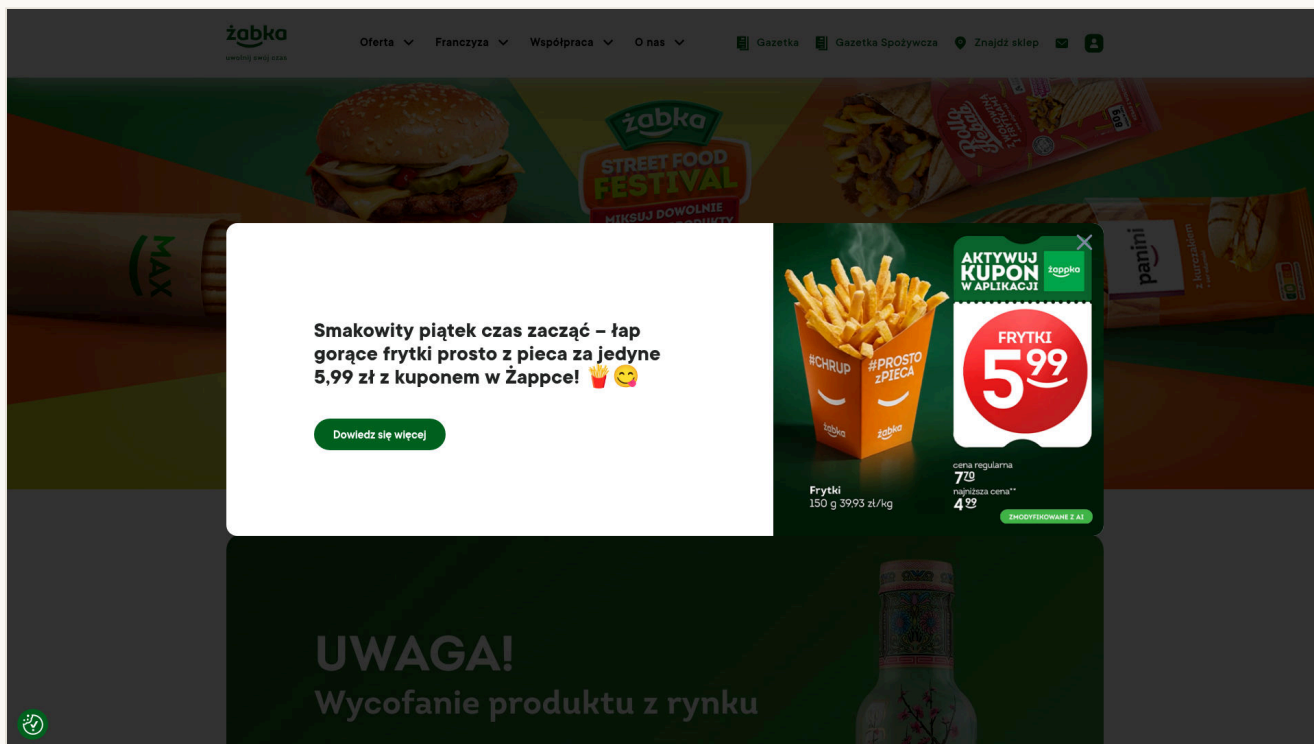
You give consent on the way in. To take it back on tvn24.pl, you scroll about thirty screens.⁹⁷



Where you withdraw consent: you give consent with one click on the first screen; to reach the consent settings you have to scroll 0 screens on Żabka (icon visible straight away), under 4 on gov.pl, about 14 on IKEA, about 23 on Gazeta.pl, about 31 on TVN24, and on MSN there is no bottom of the page. Browser pass, 2 and 3 September 2026, without logging in; a screen is the height of the browser window. AI-generated graphic, checked by me.

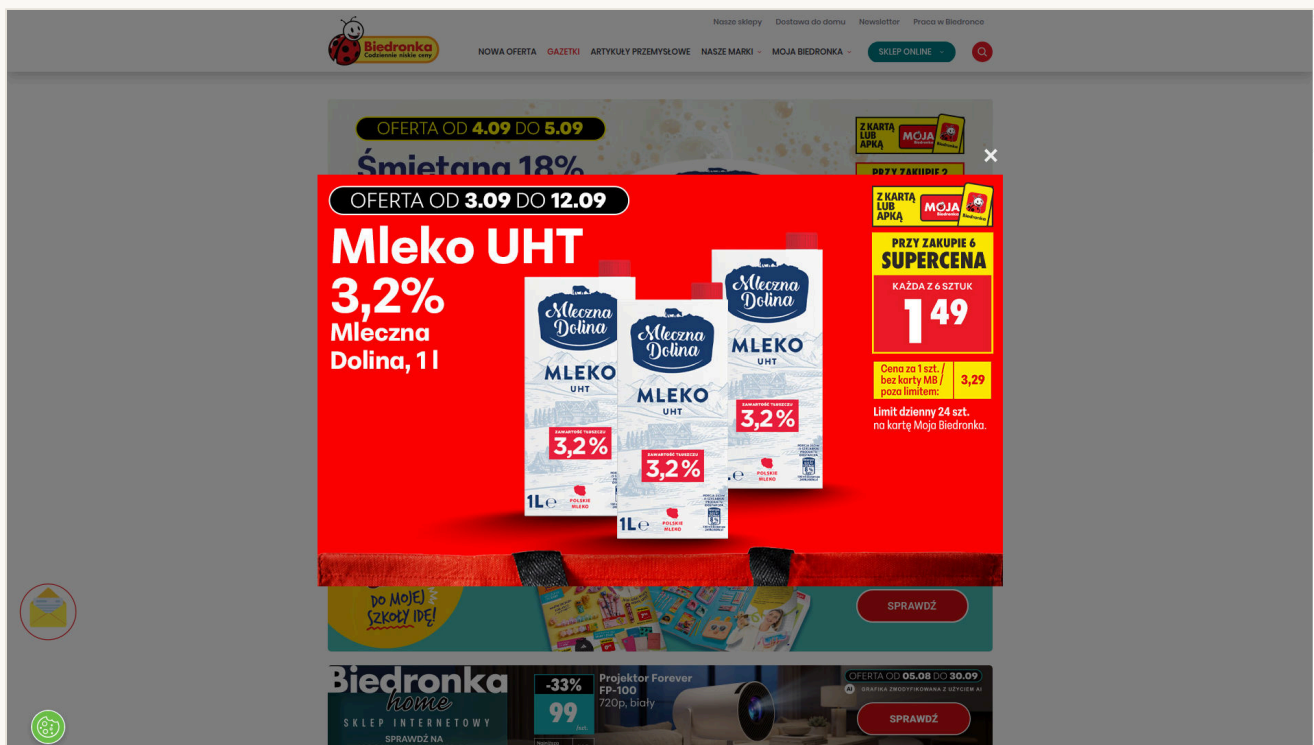
It can be done properly

After the decision, Żabka leaves a small round icon in the bottom-left corner of the screen. It is visible all the time, with no scrolling, and clicking it opens the consent panel.⁹⁸



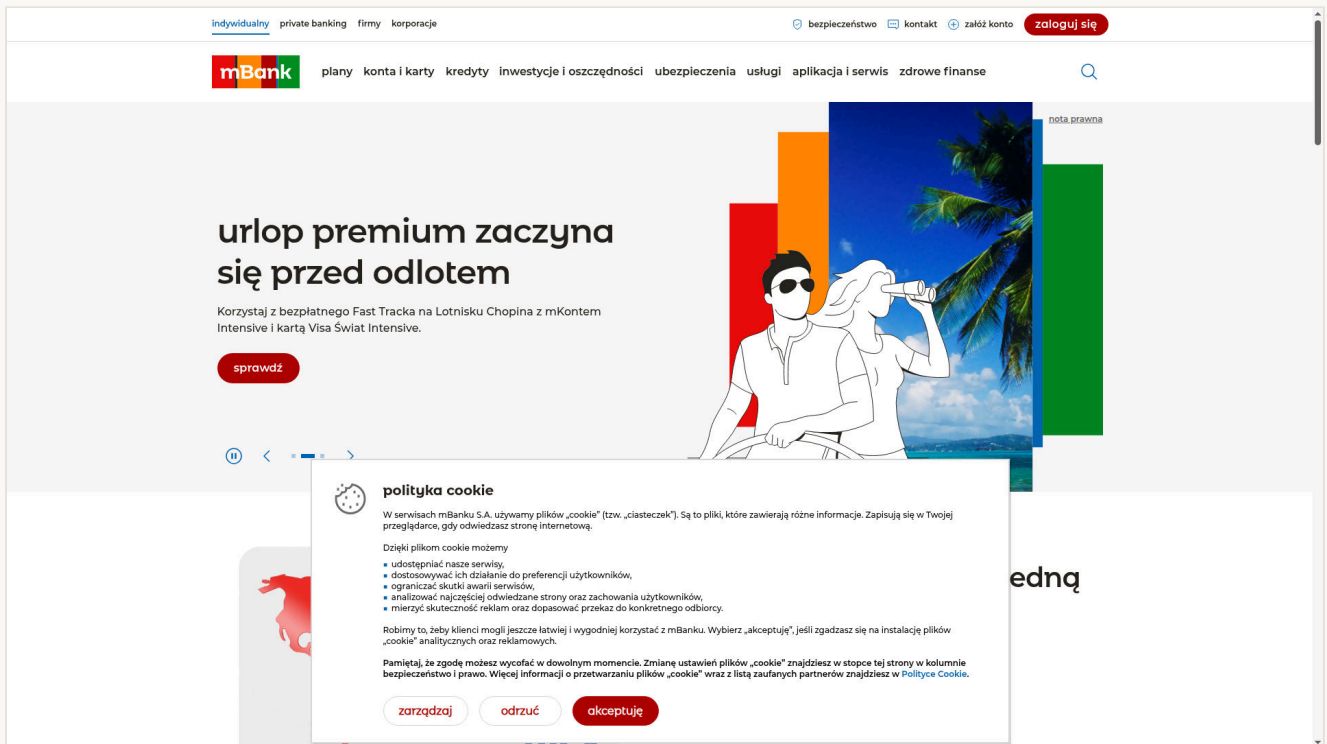
Żabka after the decision: a round consent icon in the bottom-left corner (the ad in the middle is a Żabka ad, not the consent banner). Automated counter, 4 September 2026.

Biedronka has a similar icon with a cookie in the same place. And here I admit a mistake: the AI agent in the browser pass didn't notice it and noted that there was no entry. I only caught it when checking this chapter, on the counter's screenshots.⁹⁹



Biedronka after refusal: a cookie icon in the bottom-left corner (the leaflet in the middle, not the consent banner). Automated counter, 4 September 2026.

mBank writes in its banner: “You will find the change of ‘cookie’ file settings in the footer of this page in the security and law column”. I checked. It is exactly there.¹⁰⁰



mBank: changing the settings “in the footer of this page in the security and law column”. Automated counter, 4 September 2026.

gov.pl has a “Ustawienia prywatności” link in the footer of a page that is under four screens tall.¹⁰¹

You give consent with one click. And then, on 13 of the 42 sites I checked, there is no visible place where you can take it back.

Chapter 7

The switch that already existed

The idea of setting “do not track me” once, in the browser, is not new. It has already been tried. Twice.

Do Not Track: voluntary, so dead

For years browsers sent a Do Not Track signal. Nobody had to listen to it, so... almost nobody did. In January 2019 the W3C consortium shut down work on the standard. It gave the reason plainly: there had not been enough deployment, and no sign of planned support from browsers, third parties or the wider ecosystem.¹⁰²

Global Privacy Control: binding, so it works

In California, a business that sells or shares personal information must treat an opt-out signal from the browser as a valid request.¹⁰³ Sephora ignored it and in 2022 paid \$1.2 million in a settlement with the state attorney general.¹⁰⁴ In Colorado the same duty has covered targeted advertising too since July 2024.¹⁰⁵

To be clear: the American signal is an objection to the sale of data, not consent to cookies. The mechanism is the same, though: you set it once, and the law says it must be respected.

In Europe the legal basis is already there. The GDPR allows you to object “by automated means”, and in 2023 a court in Berlin ruled that Do Not Track was a valid objection against LinkedIn.¹⁰⁶ What is missing is a common standard and a clear obligation.

i Do Not Track and Global Privacy Control: how they differ

Technically the two work in a similar way: the browser attaches a short signal to its requests. Do Not Track said “do not track me”. Global Privacy Control says “do not sell or share my data”.

No law stood behind Do Not Track. Almost nobody listened to it, and in 2019 the W3C closed work on the standard.

Global Privacy Control is the Sec-GPC header in requests, and the same information is available to the page's scripts.¹⁰⁷ In California a business that sells or shares data must treat it as a valid request. In Colorado, since 1 July 2024, also for targeted advertising.

In the EU the basis is Article 21(5) of the GDPR, and a court in Berlin found Do Not Track to be a valid objection. A common standard and an obligation are missing. Article 88b was meant to change that.

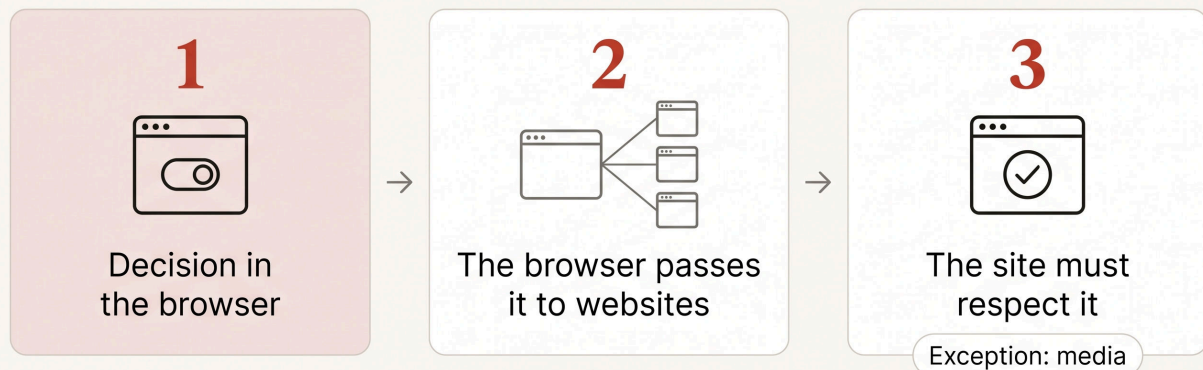
What the Commission proposes

Article 88b of the Digital Omnibus package fills exactly this gap. Websites would have to honour consent or refusal sent automatically, 24 months after the rules enter into force. Large browsers would have to offer such a switch after 48 months. The duty to respect the signal would not cover media service providers.¹⁰⁸

Next to it is Article 88a. It moves the cookie rules into the GDPR and adds two things: it must be possible to refuse consent with one button, and after a refusal the website may not ask the same again for at least six months. Media organisations wanted this paragraph deleted too.¹⁰⁹

THE COOKIE LOOPHOLE • CHAPTER 7

Set it **once**, not on every site



As of 14 September 2026: Article 88b struck out in the EU Council compromise text

European Commission draft of 19 November 2025, Article 88b GDPR. Simplified diagram.

HeadFlash.news

How the Article 88b signal would work: you set the decision once in the browser, and websites must respect it; exception for media service providers. Simplified diagram, status of the work and dates on the graphic. AI-generated graphic, checked by me.

Where it stands today, 14 September 2026

The provision has vanished from the EU Council texts. In the presidency's compromise text of 18 June 2026, Article 88b is struck out entirely.¹¹⁰ So is Article 88a, but its core stays: the Council wrote refusal with one button, and at least half a year without asking again, into the ePrivacy Directive, in the texts of 18 June and 3 September 2026.¹¹¹ The vote on the Council's position, planned for 26 June, was cancelled, and the Irish presidency took over the work.¹¹²

In the European Parliament the ITRE and LIBE committees are handling the proposal jointly. The rapporteurs are Aura Salla and Marina Kaljurand. More than 1,750 amendments were tabled to the draft report.

On 10 September the Kill the Cookie Banner coalition, which includes noyb, EDRI, BEUC and EFF among others, sent a letter to MEPs, governments and the Commission. It asks the Irish presidency to put Article 88b back into the next compromise text.¹¹³ On its website the campaign asks ordinary people for one thing: write to your MEP or to a government representative.¹¹⁴

My take

I am not selling you the Digital Omnibus as a whole. The digital and consumer organisations in the coalition call it, bluntly, a package of measures that are “mainly business-oriented and protection-reducing”, and that needs a separate piece.¹¹⁵

But this one part, a binding signal in the browser, is good. Do Not Track showed what happens to a signal nobody has to obey. California shows what happens to one they do have to obey. And my data shows what the banner is for: on six news sites, after a refusal the same list of companies remains as after consent.

I have yet to meet a person who likes a cookie banner. What I do see is a fairly big industry fighting to keep you clicking “accept all”.

Chapter 8

Small things that say more than declarations

Apple: one cookie

apple.com showed no banner for 40 seconds after I landed. The browser held exactly one cookie: geo. The same in every one of my measurements.¹¹⁶ So... it can be done.

Rossmann: here is your identifier

In its consent settings panel, Rossmann spells out “Identyfikator użytkownika:” (“User ID:”) and a string of 32 characters. Below it explains: “This user ID will be used as a unique identifier when storing and accessing user preferences in the future.”¹¹⁷ So it is the number under which your consent decision is remembered. You are simply handed it to read.

The screenshot shows the Rossmann consent panel. At the top, it says "Polityka plików cookies." and "Lista plików cookie wykorzystywanych w serwisie." Below this, there is a section titled "Identyfikator użytkownika:" followed by a greyed-out field containing a 32-character string. A note below explains: "Ten identyfikator użytkownika będzie używany jako unikalny identyfikator podczas przechowywania i uzyskiwania dostępu do preferencji użytkownika w przyszłości." There is a red button "Zgoda na wszystkie" and a link "Zarządzaj preferencjami zgody". Below this is a list of settings with toggle switches: "Poznanie zachowań użytkownika", "Optymalizacja treści serwisu i aplikacji", "Remarketing", "Rozszerzony pomiar skuteczności reklam", "Personalizacja treści", "Działanie serwisu i aplikacji", "Zarządzanie udzielonymi zgodami", and "Zapewnienie bezpieczeństwa serwisu i aplikacji". The last three are set to "Zawsze aktywne". At the bottom, there are two buttons: "Odrzuć wszystkie" and "Zapisz ustawienia zgód".

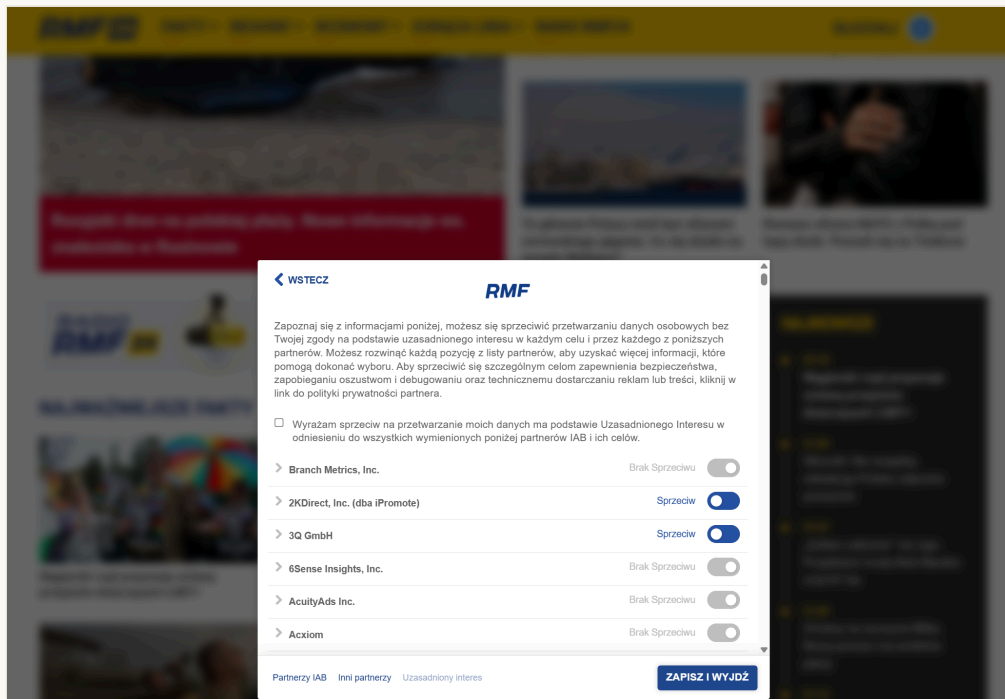
Rossmann, consent panel: “Identyfikator użytkownika:”; value hidden in the report. Author’s screenshot, 14 September 2026.

RMF24: a switch that says two things at once

In the “Uzasadniony interes” (“Legitimate interest”) tab on rmf24.pl, every partner has its own switch. By default it sits on “Brak Sprzeciwu” (“No Objection”): grey, with the knob on the right, where an ordinary switch means “on”. After a click it changes to “Sprzeciw” (“Objection”): it turns blue and the knob jumps to the left.¹

¹⁸

In both states the colour says one thing and the knob position says another. Without reading the label you do not know what you chose.



rmf24.pl, “Uzasadniony interes” tab after switching two switches to “Sprzeciw”. Author’s screenshot, 14 September 2026.

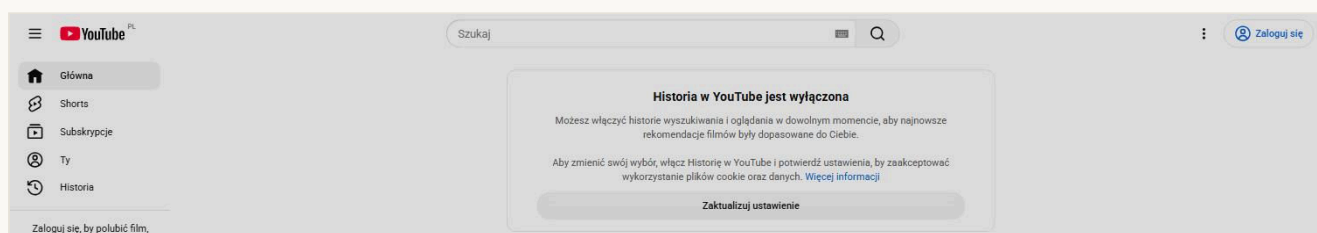
Reddit: refusal and the X look the same

After you click refuse, Reddit stores the cookie `eu_cookie_opted=1` in the browser. Closing the banner with the X sets exactly the same one.¹¹⁹ From the cookies you cannot tell whether you refused or just closed the window. What Reddit recorded on its own side, you cannot see.

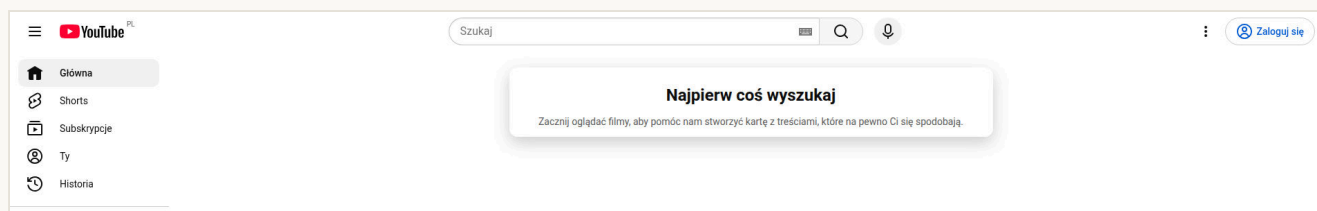
YouTube: refusal with a hint

After a refusal, the YouTube home page is empty and shows the message “Historia w YouTube jest wyłączona” (“YouTube history is turned off”). Below it: “To change your choice, turn on YouTube History and confirm the settings to accept the use of cookies and data.”

Except that after accepting, a new user also sees an empty page, just with the message “Najpierw coś wyszukaj” (“Search for something first”).¹²⁰ It is empty either way. Only the person who refused gets a hint on how to agree.



YouTube after refusal: “Historia w YouTube jest wyłączona”. Browser pass, 2 September 2026.

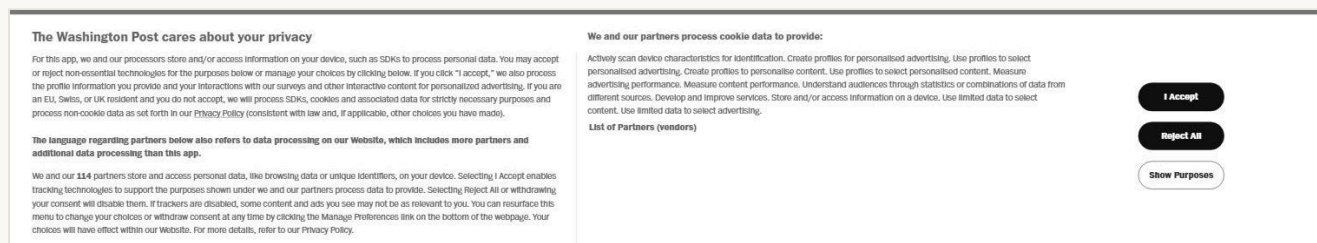


YouTube after accepting: “Najpierw coś wyszukaj”. Automated counter, 4 September 2026.

And whoever opens “Więcej opcji” (“More options”) lands on a sentence worth reading twice: “If you do not choose ‘Odrzuć wszystko’ (‘Reject all’), Google will also use cookies and IP addresses to show ads and measure their effectiveness, and to develop and improve new services.”¹²¹ It follows that switching off the toggles in “Więcej opcji” is not the same as “Odrzuć wszystko”.

The Washington Post does not speak Polish

Polish IP address, Polish browser, and the Washington Post banner in English. Amazon.de, a German domain, showed me a banner in Polish.¹²²



Washington Post from a Polish IP address: banner in English, “I Accept” and “Reject All”. Browser pass, 2 September 2026.

Sentences that should be standard

x-kom writes in its banner: “If you do not agree, ads will still be displayed, but they will not be tailored to you.”

Zalando names countries outright: “This may mean that your data will also be processed in the United States and China.”

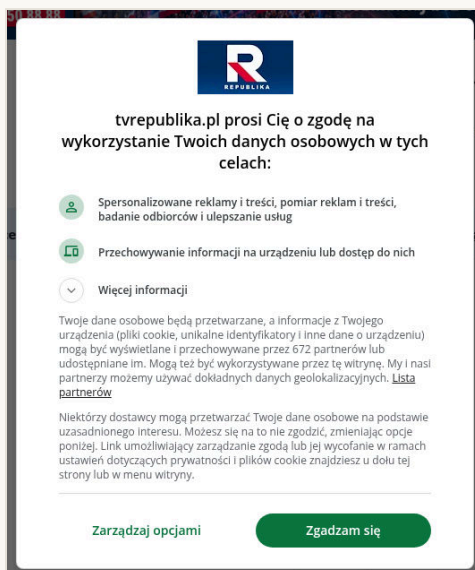
Instead of a list of hundreds of companies, mBank gives two names: “Check the privacy policy for Meta Platforms Inc. and Google Ireland Limited.”¹²³

Three sentences that tell you what you are agreeing to.

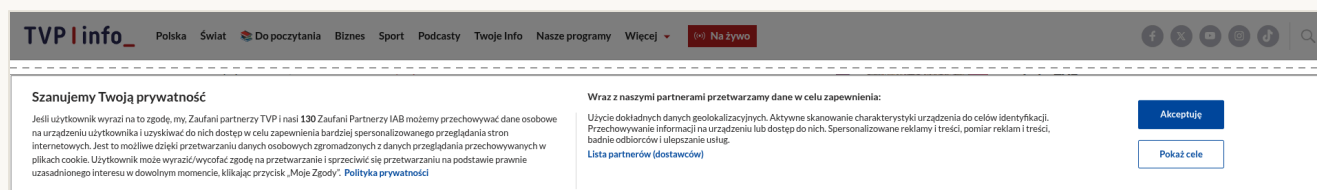
Two TV stations, one afternoon

TV Republika and TVP Info are two television news stations: one private, one public. The counter visited them on 4 September 2026, one after the other, within a quarter of an hour.¹²⁴

On the first screen neither offers a refusal. TV Republika has a green button “Zgadzam się” (“I agree”) and next to it “Zarządzaj opcjami” (“Manage options”). TVP Info has “Akceptuję” (“I accept”) and “Pokaż cele” (“Show purposes”). TV Republika mentions 672 partners in its banner, TVP Info 130 IAB partners and, separately, TVP’s own partners.¹²⁵



TV Republika, first screen: “Zarządzaj opcjami” and “Zgadzam się”, 672 partners in the text. Automated counter, 4 September 2026.



TVP Info, first screen: “Akceptuję” and “Pokaż cele”, “130 Zaufanych Partnerów IAB” (“130 Trusted IAB Partners”) in the text, middle of the page cut out (dashed line). Automated counter, 4 September 2026.

After one click of consent the difference becomes huge. In TV Republika’s record of the decision (the TC string), 469 companies get the green light for consent and 403 for legitimate interest. On TVP Info it is 121 and 49. TV Republika’s partner list is 21 minutes of reading, TVP Info’s 6.5 minutes.¹²⁶

Cookies tell the same story. TV Republika sets 359 third-party cookies from 167 domains. TVP Info sets 7 from 18. In one of the three runs TVP Info set 32, but even that is more than ten times fewer than TV Republika’s lowest result, 353.¹²⁷

And refusal? On TVP Info it is “Pokaż cele”, then “Odrzucenie wszystkich” (“Reject all”). Two clicks, and the record is left with zero consents and zero legitimate interest. That is one of the ten clean cases from Chapter 2. On TV Republika the counter did not finish the refusal in any of the three runs, and I did not do a browser pass there.¹²⁸ What is left after “no”, I do not know. I know what “yes” gives.

I do not know how much each of these stations earns from online advertising. I know how many companies each writes into the consent record and how many cookies each sets after one click. Same country, same industry, same day.

Chapter 9

Method, and where I may be wrong

Two tools

The browser pass. 42 sites, 2 and 3 September 2026. An AI agent (Claude in Chrome) did the clicking and note-taking, in a separate Chrome installation. I supervised every step. The agent copied the exact button labels, counted clicks and scrolls, took screenshots and looked for where you can change your decision afterwards. A banner that merely disappeared was not enough. It checked the state after the decision in the consent record. It went through each path once.¹²⁹

The automated counter. 50 sites, each three times, on 4 September 2026. It is a script in the Chromium browser that does not pretend to be a human. On every site it measures four states, each in a fresh, clean browser: before any click, after refusal, after a full refusal that includes the objection to legitimate interest, and after acceptance. In each state it reads the TCF decision record, the cookies and the network traffic.¹³⁰

The split of roles is simple. What a human sees (buttons, clicks, paywalls, withdrawing consent) is settled by the browser pass. The numbers (companies, cookies, traffic) are settled by the counter. Eight sites have only the counter.¹³¹

Everything went through one connection, via a Polish internet provider. On a computer only, not on a phone. I never logged in anywhere.¹³²

Where the tools disagreed

On Onet and Wyborcza the counter did not find the objection to legitimate interest. The agent did: on Onet eight screens down the panel, on Wyborcza after three scrolls.¹³³ A script hunting for the objection on the page does not see it. That is a result too.

On Ceneo one click on “Nie zgadzam się” (“I do not agree”) was enough for the agent. For the counter, the same button, in every run, was followed by one more screen with “ZAPISZ” (“SAVE”).¹³⁴ I do not know if this is a different banner variant or a difference between the tools.

On Rossmann the agent saw the banner. The counter never saw it.¹³⁵

That is also where small differences in the numbers come from. On wyborcza.pl the browser pass counted 333 companies after a refusal, and the counter 336 a day later. On rmf24.pl the panel showed 363 legitimate interest switches, while the decision record read by the counter had 371 companies. The browser pass counted what the panel shows, the counter read the record. Where exactly the gap of a few companies comes from, I do not know. In the text I give the number from the tool I describe in that place, and I do not average anything.

On Amazon, Bild, Reddit, Ryanair, TikTok and TV Republika the counter failed to refuse in at least one of three runs. On WP every refusal ends in a paywall. That is why I count the traffic after refusal on 39 sites, not 50.¹³⁶

The agent also made mistakes. I know of two, and both are in the text.

On rp.pl the first time it did not find the refuse button hidden in a scrollable frame, and noted that there is no refusal. I showed it a screenshot with the button and the measurement was done again. The counter found that button in every run.¹³⁷

On Biedronka it missed the floating consent icon in the bottom left corner and recorded that there is no way back to change the decision. The icon is visible in the counter's screenshots from 4 September. I leave the raw record of the pass unchanged, and in the report I count Biedronka as a site with a way back.¹³⁸

There is one lesson: if a tool does not see something, it does not mean that it is not there. That goes for the counter and the agent alike (and for me, too).

The Grok check

On 13 September 2026 Grok Bot, an agent from xAI, measured the sites from my list. It got only the list of sites. It measured with its own script, in a separately launched Chrome without the agent extension, each time from a new, empty profile. It opened my data and the earlier version of the text only after it had closed its own measurement. It worked on the same computer and through the same connection as the browser pass.¹³⁹

On the 16 sites where its script clicked accept and read the TCF record, the number of companies with consent matched mine. On 12 of them exactly, on 4 with a difference of two or three companies. It saw for itself that legitimate interest remains after refusal: 246 companies on Gazeta.pl, 336 on Wyborcza. The clean refusals on OLX, MSN, Lidl, Wykop and Allegro came out the same as mine. It recorded the paywall on WP with the same price list. It did not judge any claim to be wrong or exaggerated.¹⁴⁰

This was a check for gross errors, not a second full measurement. Its script did not handle Bild and Interia. It did not repeat withdrawing consent, typos, cookies or traffic recipients. Those claims rest on my measurement alone.

What this report does not say

This is a snapshot from 2 to 4 September 2026. Sites change. InPost fixed a typo, and in Grok's run nine days later a few numbers differed by two or three companies.

One connection, one place, computer only. On a phone and in apps it may be different. I did not log in, so I did not see account settings.

The counter does not hide that it is a bot. A site may show it something different than it shows a human. Whether that happened on Rossmann, I do not know.

A TCF record is a declaration, not proof of tracking. A request to a domain is not proof of data processing. The split of domains into advertising, analytics and the rest is mine, and the list is public so that you can disagree with it.¹⁴¹

Everything is public: the results, the records of both tools and the screenshots, at <https://github.com/martiGIT/ciasteczkowy-wytrych-dane>. I do not publish the full network traffic and cookie records, because they contain the IP address of my connection and session identifiers. The numbers taken from them are in the counter's records.

The number of screens depends on the window height. It is an approximation, not a measure accurate to the pixel.

I do not judge what is lawful. That is the job of data protection authorities and courts. I compare what I measured with the law, with EDPB guidelines and with the TCF standard itself.

Chapter 10

About the author

My name is Marcin Rybak. Security and privacy are my passion, not my day job. I have been writing about them on LinkedIn for years.

I run HeadFlash, a bilingual newsletter and podcast about AI, privacy and security, every working day.¹⁴² This report is published in HeadFlash, in the Reports section. The article, the data and the current PDF are on the report page: headflash.news/reports/the-cookie-loophole.

Since I write about banners: HeadFlash.news sets no cookies and shows no banner. The only external connection is the visit statistics from Cloudflare Web Analytics.¹⁴³

Questions, comments and corrections to the report are welcome. I read every one.

Acknowledgements

First to my wife, **Maria Rybak**: for the human perspective and for the first conversations, where it all started.

To my children: for surviving my going on about how “this really matters for you”. And then concluding on their own that “they are cheating us”.

And to the people who read the report before publication:

- **Katarzyna Drag** , Research & Consulting - AI and Neuroinclusion, Fundacja Serio. For a more careful read than I expected, and for checking that the text is clear for neurodivergent readers too.
- **Adam Haertle** , editor-in-chief of ZaufanaTrzeciaStrona.pl. For an honest opinion, no beating around the bush.
- **Dr Paula Skrzypecka** , a lawyer specialising in new technologies and IT law. For the legal review, for the footnotes that appeared twice, and for the numbers that did not add up. She caught what the AI missed.

You made this report better. The mistakes that remain are mine.

Appendix 1: list of sites

Every site in the study, in five groups. Each name links to its results in appendix 2.

Poland

SITE	ADDRESS	MEASURED
Allegro	allegro.pl	browser pass, counter
Ceneo	www.ceneo.pl	browser pass, counter
Filmweb	www.filmweb.pl	browser pass, counter
Gazeta.pl	www.gazeta.pl	browser pass, counter
InPost	inpost.pl	browser pass, counter
Interia	www.interia.pl	browser pass, counter
naTemat	natemat.pl	browser pass, counter
OLX	www.olx.pl	browser pass, counter
Onet	www.onet.pl	browser pass, counter
Otomoto	www.otomoto.pl	browser pass, counter
RMF24	www.rmf24.pl	browser pass, counter
Rzeczpospolita	www.rp.pl	browser pass, counter
TV Republika	tvrepublika.pl	counter
TVN24	tvn24.pl	browser pass, counter
TVP Info	www.tvp.info	counter
WP	www.wp.pl	browser pass, counter
Wyborcza.pl	wyborcza.pl	browser pass, counter
Wykop	wykop.pl	browser pass, counter
x-kom	www.x-kom.pl	browser pass, counter

Poland, everyday services

SITE	ADDRESS	MEASURED
Alior Bank	www.aliorbank.pl	counter
Biedronka	www.biedronka.pl	browser pass, counter
DOZ.pl	www.doz.pl	browser pass, counter
Empik	www.empik.com	counter
Gemini	gemini.pl	browser pass, counter
ING	www.ing.pl	counter
Lidl	www.lidl.pl	browser pass, counter
mBank	www.mbank.pl	browser pass, counter

SITE	ADDRESS	MEASURED
Pyszne.pl	www.pyszne.pl	counter
Rossmann	www.rossmann.pl	browser pass, counter
Żabka	www.zabka.pl	browser pass, counter

Non-EU giants

SITE	ADDRESS	MEASURED
Amazon.de	www.amazon.de	browser pass, counter
Apple	www.apple.com	browser pass, counter
ChatGPT	chatgpt.com	browser pass, counter
Facebook	www.facebook.com	browser pass, counter
LinkedIn	www.linkedin.com	browser pass, counter
MSN	www.msn.com	browser pass, counter
Netflix	www.netflix.com	browser pass, counter
Reddit	www.reddit.com	browser pass, counter
TikTok	www.tiktok.com	browser pass, counter
Washington Post	www.washingtonpost.com	browser pass, counter
Wikipedia	pl.wikipedia.org	counter
YouTube	www.youtube.com	browser pass, counter

Europe

SITE	ADDRESS	MEASURED
Bild.de	www.bild.de	browser pass, counter
Booking.com	www.booking.com	browser pass, counter
IKEA	www.ikea.com	browser pass, counter
Ryanair	www.ryanair.com	counter
Spotify	open.spotify.com	browser pass, counter
Zalando	www.zalando.pl	browser pass, counter

Institutions

SITE	ADDRESS	MEASURED
European Commission	commission.europa.eu	browser pass, counter
gov.pl	www.gov.pl	browser pass, counter

Appendix 2: site by site

One section per site. Every figure comes from the file named under the table, so a reader can check it without trusting me.

Poland

Allegro

Poland · <https://allegro.pl/>

Refusal on the first layer	yes (Nie zgadzam się)	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	not established	counter
TCF vendors after accepting	9	counter
Vendors on legitimate interest after refusing	0	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 14	counter
Third-party hosts after accepting	12	counter
Consent platform	TCF: Allegro Sp. z o.o.	counter
Pay-or-consent wall	no	browser pass
Partner list	26	browser pass

Screenshots: allegro_desktop_01-landing_20260902.png, allegro_desktop_02-layer1_20260902.png, allegro_desktop_03-layer2-defaults_20260902.png, allegro_desktop_05-after-reject_20260902.png

Files: data/runs/allegro/human/desktop/result.yaml, data/runs/allegro/auto/desktop/20260904-115850/result.json

Ceneo

Poland · <https://www.ceneo.pl/>

Refusal on the first layer	yes (Nie zgadzam się)	browser pass
Clicks to accept	not established	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter

Third-party cookies (before / after refuse / after accept)	6 / 6 / 7	counter
Third-party hosts after accepting	11	counter
Consent platform	none	counter
Pay-or-consent wall	no	browser pass
Partner list	5 min to read, 3 screens	counter

Files: data/runs/ceneo/human/desktop/result.yaml, data/runs/ceneo/auto/desktop/20260904-142127/result.json

Filmweb

Poland · <https://www.filmweb.pl/>

Refusal on the first layer	no	browser pass
Clicks to accept	not established	browser pass
Clicks to refuse	2	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	935	counter
Vendors on legitimate interest after refusing	17	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 9	counter
Third-party hosts after accepting	11	counter
Consent platform	Didomi	counter
Pay-or-consent wall	no	browser pass
Partner list	14 min to read, 1 screens	counter

Files: data/runs/filmweb/human/desktop/result.yaml, data/runs/filmweb/auto/desktop/20260904-143056/result.json

Gazeta.pl

Poland · <https://www.gazeta.pl/>

Refusal on the first layer	no	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	2	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	629	counter
Vendors on legitimate interest after refusing	246	counter
Third-party cookies (before / after refuse / after accept)	8 / 9 / 33	counter

Third-party hosts after accepting	47	counter
Consent platform	OneTrust	counter
Pay-or-consent wall	no	browser pass
Partner list	28 min to read, 22 screens	counter

Screenshots: gazeta_desktop_01-landing_20260902.png, gazeta_desktop_02-layer1_20260902.png, gazeta_desktop_03-layer2-defaults_20260902.png, gazeta_desktop_05-after-reject_20260902.png

Files: data/runs/gazeta/human/desktop/result.yaml, data/runs/gazeta/auto/desktop/20260904-121415/result.json

InPost

Poland · <https://inpost.pl/>

Refusal on the first layer	yes (ODRZUĆ WSZYSKO)	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 8	counter
Third-party hosts after accepting	15	counter
Consent platform	Didomi	counter
Pay-or-consent wall	no	browser pass
Partner list	16	browser pass

Screenshots: inpost_desktop_01-landing_20260902.png, inpost_desktop_02-layer1_20260902.png, inpost_desktop_03-layer2-defaults_20260902.png, inpost_desktop_05-after-reject_20260902.png

Files: data/runs/inpost/human/desktop/result.yaml, data/runs/inpost/auto/desktop/20260904-122349/result.json

Interia

Poland · <https://www.interia.pl/>

Refusal on the first layer	no	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	2	browser pass
Clicks to a full refusal	3	counter
TCF vendors after accepting	935	counter

Vendors on legitimate interest after refusing	0	counter
Third-party cookies (before / after refuse / after accept)	5 / 8 / 118	counter
Third-party hosts after accepting	68	counter
Consent platform	TCF: Interia.pl sp. z o.o.	counter
Pay-or-consent wall	no	browser pass
Partner list	18 min to read, 22 screens	counter

Screenshots: interia_desktop_01-landing_20260902.png, interia_desktop_02-layer1_20260902.png, interia_desktop_05-after-reject_20260902.png

Files: data/runs/interia/human/desktop/result.yaml, data/runs/interia/auto/desktop/20260904-115330/result.json

naTemat

Poland · <https://natemat.pl/>

Refusal on the first layer	no	browser pass
Clicks to accept	not established	browser pass
Clicks to refuse	4	browser pass
Clicks to a full refusal	4	counter
TCF vendors after accepting	173	counter
Vendors on legitimate interest after refusing	61	counter
Third-party cookies (before / after refuse / after accept)	0 / 7 / 190	counter
Third-party hosts after accepting	100	counter
Consent platform	TCF: InMobi PTE Ltd	counter
Pay-or-consent wall	no	browser pass
Partner list	11 min to read, 12 screens	counter

Files: data/runs/natemat/human/desktop/result.yaml, data/runs/natemat/auto/desktop/20260904-142609/result.json

OLX

Poland · <https://www.olx.pl/>

Refusal on the first layer	yes (Akceptuj niezbędne)	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	2	counter

TCF vendors after accepting	433	counter
Vendors on legitimate interest after refusing	0	counter
Third-party cookies (before / after refuse / after accept)	2 / 2 / 18	counter
Third-party hosts after accepting	34	counter
Consent platform	OneTrust	counter
Pay-or-consent wall	no	browser pass
Partner list	446	browser pass

Screenshots: `olx_desktop_01-landing_20260902.png`, `olx_desktop_02-layer1_20260902.png`, `olx_desktop_05-after-reject_20260902.png`

Files: `data/runs/olx/human/desktop/result.yaml`, `data/runs/olx/auto/desktop/20260904-120303/result.json`

Onet

Poland · <https://www.onet.pl/>

Refusal on the first layer	no	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	3	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	932	counter
Vendors on legitimate interest after refusing	810	counter
Third-party cookies (before / after refuse / after accept)	19 / 21 / 25	counter
Third-party hosts after accepting	31	counter
Consent platform	TCF: Ringier Axel Springer Polska	counter
Pay-or-consent wall	no	browser pass
Partner list	33 min to read, 12 screens	counter

Screenshots: `onet_desktop_01-landing_20260902.png`, `onet_desktop_02-layer1_20260902.png`, `onet_desktop_03-layer2-defaults_20260902.png`, `onet_desktop_04-partners-end_20260902.png`, `onet_desktop_04-partners-p1_20260902.png`, `onet_desktop_05-after-reject_20260902.png`, `onet_desktop_90-extra-po-nie-wyrazam-zgody_20260902.png`, `onet_desktop_90-extra-uia-domyslnie-wlaczone_20260902.png`, `onet_desktop_90-extra-uia-po-sprzeciwie_20260902.png`

Files: `data/runs/onet/human/desktop/result.yaml`, `data/runs/onet/auto/desktop/20260904-171930/result.json`

Otomoto

Poland · <https://www.otomoto.pl/>

Refusal on the first layer	yes (Zezwól tylko na niezbędne)	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	352	counter
Vendors on legitimate interest after refusing	0	counter
Third-party cookies (before / after refuse / after accept)	2 / 2 / 8	counter
Third-party hosts after accepting	20	counter
Consent platform	OneTrust	counter
Pay-or-consent wall	no	browser pass
Partner list	374	browser pass

Screenshots: otomoto_desktop_01-landing_20260902.png, otomoto_desktop_02-layer1_20260902.png, otomoto_desktop_05-after-reject_20260902.png

Files: data/runs/otomoto/human/desktop/result.yaml, data/runs/otomoto/auto/desktop/20260904-120806/result.json

RMF24

Poland · <https://www.rmf24.pl/>

Refusal on the first layer	no	browser pass
Clicks to accept	not established	browser pass
Clicks to refuse	4	browser pass
Clicks to a full refusal	4	counter
TCF vendors after accepting	935	counter
Vendors on legitimate interest after refusing	371	counter
Third-party cookies (before / after refuse / after accept)	12 / 12 / 323	counter
Third-party hosts after accepting	171	counter
Consent platform	TCF: Grupa RMF sp. z o.o. sp. k.	counter
Pay-or-consent wall	no	browser pass
Partner list	8 min to read, 8 screens	counter

Files: data/runs/rmf24/human/desktop/result.yaml, data/runs/rmf24/auto/desktop/20260904-140642/result.json

Rzeczpospolita

Poland · <https://www.rp.pl/>

Refusal on the first layer	yes (Nie wyrażam zgody)	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	914	counter
Vendors on legitimate interest after refusing	0	counter
Third-party cookies (before / after refuse / after accept)	4 / 5 / 21	counter
Third-party hosts after accepting	21	counter
Consent platform	TCF: consentmanager.net	counter
Pay-or-consent wall	no	browser pass
Partner list	1094	browser pass

Files: data/runs/rp/human/desktop/result.yaml, data/runs/rp/auto/desktop/20260904-141641/result.json

TV Republika

Poland · <https://tvrepublika.pl/>

Refusal on the first layer	not established	counter
Clicks to accept	1	counter
Clicks to refuse	not established	counter
Clicks to a full refusal	not established	counter
TCF vendors after accepting	469	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	5 / 5 / 359	counter
Third-party hosts after accepting	167	counter
Consent platform	TCF: Google LLC	counter
Partner list	21 min to read, 10 screens	counter

Files: data/runs/tvrepublika/auto/desktop/20260904-172713/result.json

TVN24

Poland · <https://tvn24.pl/>

Refusal on the first layer	no	browser pass
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Clicks to accept	1	browser pass
Clicks to refuse	2	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	161	counter
Vendors on legitimate interest after refusing	0	counter
Third-party cookies (before / after refuse / after accept)	0 / 5 / 119	counter
Third-party hosts after accepting	84	counter
Consent platform	OneTrust	counter
Pay-or-consent wall	no	browser pass
Partner list	13 min to read, 29 screens	counter

Screenshots: tvn24_desktop_01-landing_20260902.png, tvn24_desktop_02-layer1_20260902.png, tvn24_desktop_03-layer2-defaults_20260902.png, tvn24_desktop_05-after-reject_20260902.png

Files: data/runs/tvn24/human/desktop/result.yaml, data/runs/tvn24/auto/desktop/20260904-121906/result.json

TVP Info

Poland · <https://www.tvp.info/>

Refusal on the first layer	no	counter
Clicks to accept	1	counter
Clicks to refuse	2	counter
Clicks to a full refusal	2	counter
TCF vendors after accepting	121	counter
Vendors on legitimate interest after refusing	0	counter
Third-party cookies (before / after refuse / after accept)	5 / 5 / 7	counter
Third-party hosts after accepting	18	counter
Consent platform	OneTrust	counter
Partner list	6 min to read, 24 screens	counter

Files: data/runs/tvpinfo/auto/desktop/20260904-173106/result.json

WP

Poland · <https://www.wp.pl/>

Refusal on the first layer	no	browser pass
Clicks to accept	1	browser pass

Clicks to refuse	1	browser pass
Clicks to a full refusal	3	counter
TCF vendors after accepting	935	counter
Vendors on legitimate interest after refusing	367	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 211	counter
Third-party hosts after accepting	120	counter
Consent platform	TCF: Wirtualna Polska Media S.A.	counter
Pay-or-consent wall	yes (od 5,75 do 7,50 zł / miesiąc)	browser pass
Partner list	1019	browser pass

Screenshots: wp_desktop_01-landing_20260902.png, wp_desktop_02-layer1_20260902.png, wp_desktop_03-layer2-defaults_20260902.png, wp_desktop_07-consent-wall_20260902.png

Files: data/runs/wp/human/desktop/result.yaml, data/runs/wp/auto/desktop/20260904-114855/result.json

Wyborcza.pl

Poland · <https://wyborcza.pl/>

Refusal on the first layer	no	browser pass
Clicks to accept	not established	browser pass
Clicks to refuse	3	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	801	counter
Vendors on legitimate interest after refusing	336	counter
Third-party cookies (before / after refuse / after accept)	10 / 10 / 19	counter
Third-party hosts after accepting	33	counter
Consent platform	OneTrust	counter
Pay-or-consent wall	no	browser pass
Partner list	22 min to read, 20 screens	counter

Files: data/runs/wyborcza/human/desktop/result.yaml, data/runs/wyborcza/auto/desktop/20260904-141148/result.json

Wykop

Poland · <https://wykop.pl/>

Refusal on the first layer	no	browser pass
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Clicks to accept	not established	browser pass
Clicks to refuse	2	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	935	counter
Vendors on legitimate interest after refusing	0	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 409	counter
Third-party hosts after accepting	185	counter
Consent platform	TCF: Tri-table Sp. z o.o.	counter
Pay-or-consent wall	no	browser pass
Partner list	4 min to read, 1 screens	counter

Files: data/runs/wykop/human/desktop/result.yaml, data/runs/wykop/auto/desktop/20260904-123251/result.json

x-kom

Poland · <https://www.x-kom.pl/>

Refusal on the first layer	no	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	2	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 54	counter
Third-party hosts after accepting	46	counter
Consent platform	none	counter
Pay-or-consent wall	no	browser pass
Partner list	21 min to read, 8 screens	counter

Screenshots: xkom_desktop_01-landing_20260902.png, xkom_desktop_02-layer1_20260902.png, xkom_desktop_03-layer2-defaults_20260902.png, xkom_desktop_05-after-reject_20260902.png, xkom_desktop_90-extra-baner-po-28-sekundach_20260902.png

Files: data/runs/xkom/human/desktop/result.yaml, data/runs/xkom/auto/desktop/20260904-122832/result.json

Poland, everyday services

Alior Bank

Poland, everyday services · <https://www.aliorbank.pl/>

Refusal on the first layer	yes	counter
Clicks to accept	1	counter
Clicks to refuse	1	counter
Clicks to a full refusal	2	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 1	counter
Third-party hosts after accepting	6	counter
Consent platform	none	counter

Files: data/runs/alior/auto/desktop/20260904-174044/result.json

Biedronka

Poland, everyday services · <https://www.biedronka.pl/>

Refusal on the first layer	no	browser pass
Clicks to accept	not established	browser pass
Clicks to refuse	2	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 0	counter
Third-party hosts after accepting	13	counter
Consent platform	OneTrust	counter
Pay-or-consent wall	no	browser pass
Partner list	2 min to read, 6 screens	counter

Files: data/runs/biedronka/human/desktop/result.yaml, data/runs/biedronka/auto/desktop/20260904-144536/result.json

DOZ.pl

Poland, everyday services · <https://www.doz.pl/>

Refusal on the first layer	no	browser pass
Clicks to accept	not established	browser pass
Clicks to refuse	2	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	1 / 1 / 10	counter
Third-party hosts after accepting	20	counter
Consent platform	none	counter
Pay-or-consent wall	no	browser pass
Partner list	3 min to read, 3 screens	counter

Files: data/runs/doz/human/desktop/result.yaml, data/runs/doz/auto/desktop/20260904-143551/result.json

Empik

Poland, everyday services · <https://www.empik.com/>

Refusal on the first layer	no	counter
Clicks to accept	not established	counter
Clicks to refuse	2	counter
Clicks to a full refusal	2	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	1 / 1 / 1	counter
Third-party hosts after accepting	5	counter
Consent platform	none	counter
Partner list	18 min to read, 9 screens	counter

Files: data/runs/empik/auto/desktop/20260904-174524/result.json

Gemini

Poland, everyday services · <https://gemini.pl/>

Refusal on the first layer	yes (Nie zgadzam się)	browser pass
Clicks to accept	not established	browser pass
Clicks to refuse	1	browser pass

Clicks to a full refusal	2	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after re-fusing	not established	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 29	counter
Third-party hosts after accepting	39	counter
Consent platform	OneTrust	counter
Pay-or-consent wall	no	browser pass

Files: data/runs/gemini/human/desktop/result.yaml, data/runs/gemini/auto/desktop/20260904-144039/result.json

ING

Poland, everyday services · <https://www.ing.pl/>

Refusal on the first layer	yes	counter
Clicks to accept	1	counter
Clicks to refuse	1	counter
Clicks to a full refusal	2	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after re-fusing	not established	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 2	counter
Third-party hosts after accepting	11	counter
Consent platform	none	counter

Files: data/runs/ing/auto/desktop/20260904-173556/result.json

Lidl

Poland, everyday services · <https://www.lidl.pl/>

Refusal on the first layer	yes (Odrzuć)	browser pass
Clicks to accept	not established	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	6	counter
Vendors on legitimate interest after re-fusing	0	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 26	counter

Third-party hosts after accepting	39	counter
Consent platform	OneTrust	counter
Pay-or-consent wall	no	browser pass
Partner list	6	browser pass

Files: data/runs/lidl/human/desktop/result.yaml, data/runs/lidl/auto/desktop/20260904-145034/result.json

mBank

Poland, everyday services · <https://www.mbank.pl/>

Refusal on the first layer	yes (odrzuć)	browser pass
Clicks to accept	not established	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 1	counter
Third-party hosts after accepting	7	counter
Consent platform	none	counter
Pay-or-consent wall	no	browser pass

Files: data/runs/mbank/human/desktop/result.yaml, data/runs/mbank/auto/desktop/20260904-151250/result.json

Pyszne.pl

Poland, everyday services · <https://www.pyszne.pl/>

No consent banner.

Refusal on the first layer	yes	counter
Clicks to accept	not established	counter
Clicks to refuse	1	counter
Clicks to a full refusal	not established	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	1 / 1 / 1	counter
Third-party hosts after accepting	3	counter

Consent platform	none	counter
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Files: data/runs/pyszne/auto/desktop/20260904-174938/result.json

Rossmann

Poland, everyday services · <https://www.rossmann.pl/>

No consent banner.

Refusal on the first layer	yes (Odrzuć wszystkie)	browser pass
Clicks to accept	not established	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	not established	counter
TCF vendors after accepting	0	counter
Vendors on legitimate interest after refusing	0	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 0	counter
Third-party hosts after accepting	4	counter
Consent platform	TCF: consentmanager.net	counter
Pay-or-consent wall	no	browser pass

Files: data/runs/rossmann/human/desktop/result.yaml, data/runs/rossmann/auto/desktop/20260904-145546/result.json

Żabka

Poland, everyday services · <https://www.zabka.pl/>

Refusal on the first layer	yes (Odrzuć wszystkie)	browser pass
Clicks to accept	not established	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 7	counter
Third-party hosts after accepting	13	counter
Consent platform	none	counter
Pay-or-consent wall	no	browser pass

Files: data/runs/zabka/human/desktop/result.yaml, data/runs/zabka/auto/desktop/20260904-150812/result.json

Non-EU giants

Amazon.de

Non-EU giants · <https://www.amazon.de/>

Refusal on the first layer	yes (Odrzuć)	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	103	counter
Vendors on legitimate interest after refusing	0	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 0	counter
Third-party hosts after accepting	5	counter
Consent platform	TCF: Amazon Advertising	counter
Pay-or-consent wall	no	browser pass
Partner list	4 min to read, 6 screens	counter

Screenshots: amazon_desktop_01-landing_20260902.png, amazon_desktop_02-layer1_20260902.png, amazon_desktop_05-after-reject_20260902.png, amazon_desktop_90-extra-amazon-pl_20260902.png

Files: data/runs/amazon/human/desktop/result.yaml, data/runs/amazon/auto/desktop/20260904-125109/result.json

Apple

Non-EU giants · <https://www.apple.com/pl/>

No consent banner.

Refusal on the first layer	not established	browser pass
Clicks to accept	not established	browser pass
Clicks to refuse	0	browser pass
Clicks to a full refusal	not established	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 0	counter
Third-party hosts after accepting	not established	counter
Consent platform	none	counter
Pay-or-consent wall	no	browser pass

Screenshots: apple_desktop_01-landing_20260902.png, apple_desktop_90-extra-stopka-bez-banera_20260902.png

Files: data/runs/apple/human/desktop/result.yaml, data/runs/apple/auto/desktop/20260904-130650/result.json

ChatGPT

Non-EU giants · <https://chatgpt.com/>

Refusal on the first layer	yes (Odrzuć niepotrzebne pliki cookie)	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	not established	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 0	counter
Third-party hosts after accepting	not established	counter
Consent platform	none	counter
Pay-or-consent wall	no	browser pass

Screenshots: chatgpt_desktop_01-landing_20260902.png, chatgpt_desktop_02-layer1_20260902.png, chatgpt_desktop_05-after-reject_20260902.png

Files: data/runs/chatgpt/human/desktop/result.yaml, data/runs/chatgpt/auto/desktop/20260904-133639/result.json

Facebook

Non-EU giants · <https://www.facebook.com/>

Refusal on the first layer	yes (Odrzuć opcjonalne pliki cookie)	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	1	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 0	counter
Third-party hosts after accepting	2	counter
Consent platform	none	counter
Pay-or-consent wall	no	browser pass

Screenshots: facebook_desktop_01-landing_20260902.png, facebook_desktop_02-layer1_20260902.png, facebook_desktop_05-after-reject_20260902.png

Files: data/runs/facebook/human/desktop/result.yaml, data/runs/facebook/auto/desktop/20260904-124245/result.json

LinkedIn

Non-EU giants · <https://www.linkedin.com/>

Refusal on the first layer	yes (Odrzuć)	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	1	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	3 / 3 / 10	counter
Third-party hosts after accepting	9	counter
Consent platform	none	counter
Pay-or-consent wall	no	browser pass

Screenshots: linkedin_desktop_01-landing_20260902.png, linkedin_desktop_02-layer1_20260902.png, linkedin_desktop_05-after-reject_20260902.png

Files: data/runs/linkedin/human/desktop/result.yaml, data/runs/linkedin/auto/desktop/20260904-132206/result.json

MSN

Non-EU giants · <https://www.msn.com/pl-pl>

Refusal on the first layer	yes (Odrzuć wszystkie)	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	877	counter
Vendors on legitimate interest after refusing	0	counter
Third-party cookies (before / after refuse / after accept)	14 / 14 / 14	counter
Third-party hosts after accepting	20	counter
Consent platform	TCF: Microsoft	counter
Pay-or-consent wall	no	browser pass

Partner list	960	browser pass
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Screenshots: msn_desktop_01-landing_20260902.png, msn_desktop_02-layer1_20260902.png, msn_desktop_05-after-reject_20260902.png, msn_desktop_90-extra-bing_20260902.png, msn_desktop_90-extra-microsoft-com_20260902.png

Files: data/runs/msn/human/desktop/result.yaml, data/runs/msn/auto/desktop/20260904-130208/result.json

Netflix

Non-EU giants · <https://www.netflix.com/pl/>

Refusal on the first layer	yes (Odrzuć)	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 0	counter
Third-party hosts after accepting	7	counter
Consent platform	OneTrust	counter
Pay-or-consent wall	no	browser pass

Screenshots: netflix_desktop_01-landing_20260902.png, netflix_desktop_02-layer1_20260902.png, netflix_desktop_05-after-reject_20260902.png

Files: data/runs/netflix/human/desktop/result.yaml, data/runs/netflix/auto/desktop/20260904-133127/result.json

Reddit

Non-EU giants · <https://www.reddit.com/>

Refusal on the first layer	yes (Odrzuć opcjonalne pliki cookie)	browser pass
Clicks to accept	not established	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	not established	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	0 / 1 / 1	counter

Third-party hosts after accepting	6	counter
Consent platform	none	counter
Pay-or-consent wall	no	browser pass
Partner list	10 min to read, 15 screens	counter

Screenshots: reddit_desktop_01-landing_20260902.png, reddit_desktop_02-layer1_20260902.png, reddit_desktop_09-close-x_20260902.png

Files: data/runs/reddit/human/desktop/result.yaml, data/runs/reddit/auto/desktop/20260904-131835/result.json

TikTok

Non-EU giants · <https://www.tiktok.com/>

Refusal on the first layer	yes (Odrzuć opcjonalne pliki cookie)	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	not established	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	1 / 1 / 1	counter
Third-party hosts after accepting	5	counter
Consent platform	none	counter
Pay-or-consent wall	no	browser pass
Partner list	1 min to read, 1 screens	counter

Screenshots: tiktok_desktop_01-landing_20260902.png, tiktok_desktop_02-layer1_20260902.png, tiktok_desktop_05-after-reject_20260902.png

Files: data/runs/tiktok/human/desktop/result.yaml, data/runs/tiktok/auto/desktop/20260904-124714/result.json

Washington Post

Non-EU giants · <https://www.washingtonpost.com/>

Refusal on the first layer	yes (Reject All)	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	111	counter

Vendors on legitimate interest after refusing	1	counter
Third-party cookies (before / after refuse / after accept)	1 / 1 / 131	counter
Third-party hosts after accepting	120	counter
Consent platform	OneTrust	counter
Pay-or-consent wall	no	browser pass
Partner list	114	browser pass

Screenshots: wapo_desktop_01-landing_20260902.png, wapo_desktop_02-layer1_20260902.png, wapo_desktop_05-after-reject_20260902.png

Files: data/runs/wapo/human/desktop/result.yaml, data/runs/wapo/auto/desktop/20260904-132630/result.json

Wikipedia

Non-EU giants · <https://pl.wikipedia.org/>

No consent banner.

Refusal on the first layer	not established	counter
Clicks to accept	not established	counter
Clicks to refuse	not established	counter
Clicks to a full refusal	not established	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	8 / 7 / 5	counter
Third-party hosts after accepting	1	counter
Consent platform	none	counter

Files: data/runs/wikipedia/auto/desktop/20260904-180415/result.json

YouTube

Non-EU giants · <https://www.youtube.com/>

Refusal on the first layer	yes (Odrzuć wszystko)	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	not established	counter

Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 0	counter
Third-party hosts after accepting	6	counter
Consent platform	none	counter
Pay-or-consent wall	no	browser pass

Screenshots: youtube_desktop_01-landing_20260902.png, youtube_desktop_02-layer1_20260902.png, youtube_desktop_05-after-reject_20260902.png

Files: data/runs/youtube/human/desktop/result.yaml, data/runs/youtube/auto/desktop/20260904-123755/result.json

Europe

Bild.de

Europe · <https://www.bild.de/>

Refusal on the first layer	no	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	not established	browser pass
Clicks to a full refusal	not established	counter
TCF vendors after accepting	216	counter
Vendors on legitimate interest after refusing	0	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 146	counter
Third-party hosts after accepting	98	counter
Consent platform	Sourcepoint	counter
Pay-or-consent wall	yes (3,99 EUR/Monat (dla abonentow BILDplus 2,99 EUR/Monat))	browser pass
Partner list	15 min to read, 1 screens	counter

Screenshots: bild_desktop_01-landing_20260902.png, bild_desktop_02-layer1_20260902.png, bild_desktop_03-layer2-defaults_20260902.png, bild_desktop_07-consent-wall_20260902.png

Files: data/runs/bild/human/desktop/result.yaml, data/runs/bild/auto/desktop/20260904-134053/result.json

Booking.com

Europe · <https://www.booking.com/>

Refusal on the first layer	yes (Odrzuć)	browser pass
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Clicks to accept	1	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 12	counter
Third-party hosts after accepting	17	counter
Consent platform	OneTrust	counter
Pay-or-consent wall	no	browser pass

Screenshots: booking_desktop_01-landing_20260902.png, booking_desktop_02-layer1_20260902.png, booking_desktop_05-after-reject_20260902.png

Files: data/runs/booking/human/desktop/result.yaml, data/runs/booking/auto/desktop/20260904-135652/result.json

IKEA

Europe · <https://www.ikea.com/pl/pl/>

Refusal on the first layer	yes (Akceptuj tylko niezbędne)	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 9	counter
Third-party hosts after accepting	17	counter
Consent platform	OneTrust	counter
Pay-or-consent wall	no	browser pass

Screenshots: ikea_desktop_01-landing_20260902.png, ikea_desktop_02-layer1_20260902.png, ikea_desktop_05-after-reject_20260902.png

Files: data/runs/ikea/human/desktop/result.yaml, data/runs/ikea/auto/desktop/20260904-140141/result.json

Ryanair

Europe · <https://www.ryanair.com/pl/pl/>

Refusal on the first layer	not established	counter
Clicks to accept	1	counter
Clicks to refuse	not established	counter
Clicks to a full refusal	not established	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	1 / 1 / 2	counter
Third-party hosts after accepting	8	counter
Consent platform	none	counter

Files: data/runs/ryanair/auto/desktop/20260904-180110/result.json

Spotify

Europe · <https://open.spotify.com/>

Refusal on the first layer	yes (ODRZUĆ WSZYSTKIE)	browser pass
Clicks to accept	1	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	92	counter
Vendors on legitimate interest after refusing	1	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 0	counter
Third-party hosts after accepting	13	counter
Consent platform	OneTrust	counter
Pay-or-consent wall	no	browser pass
Partner list	95	browser pass

Screenshots: spotify_desktop_01-landing_20260902.png, spotify_desktop_02-layer1_20260902.png, spotify_desktop_05-after-reject_20260902.png

Files: data/runs/spotify/human/desktop/result.yaml, data/runs/spotify/auto/desktop/20260904-134620/result.json

Zalando

Europe · <https://www.zalando.pl/>

Refusal on the first layer	yes (Tylko niezbędne)	browser pass
Clicks to accept	1	browser pass

Clicks to refuse	1	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 1	counter
Third-party hosts after accepting	9	counter
Consent platform	none	counter
Pay-or-consent wall	no	browser pass

Screenshots: zalando_desktop_01-landing_20260902.png, zalando_desktop_02-layer1_20260902.png, za-
lando_desktop_05-after-reject_20260902.png

Files: data/runs/zalando/human/desktop/result.yaml, data/runs/zalando/auto/desktop/20260904-135121/
result.json

Institutions

European Commission

Institutions · <https://commission.europa.eu/>

Refusal on the first layer	yes (Akceptuj tylko niezbędne pliki cookie)	browser pass
Clicks to accept	not established	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	1	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 0	counter
Third-party hosts after accepting	not established	counter
Consent platform	none	counter
Pay-or-consent wall	no	browser pass

Files: data/runs/ec/human/desktop/result.yaml, data/runs/ec/auto/desktop/20260904-151719/re-
sult.json

gov.pl

Institutions · <https://www.gov.pl/>

Refusal on the first layer	yes (Odrzuć)	browser pass
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Clicks to accept	not established	browser pass
Clicks to refuse	1	browser pass
Clicks to a full refusal	2	counter
TCF vendors after accepting	not established	counter
Vendors on legitimate interest after refusing	not established	counter
Third-party cookies (before / after refuse / after accept)	0 / 0 / 0	counter
Third-party hosts after accepting	1	counter
Consent platform	none	counter
Pay-or-consent wall	no	browser pass

Files: data/runs/govpl/human/desktop/result.yaml, data/runs/govpl/auto/desktop/20260904-152149/result.json

1. Browser pass, 2 September 2026: first-layer buttons, colour of the accept button, page scrolling blocked (overflow: hidden). Record: data/runs/onet/human/desktop/result.yaml. Labels in capitals, as the site displays them. [↗](#)
2. Automated counter, 4 September 2026, three runs, each from a clean browser. Companies are vendors from the IAB registry (Global Vendor List) with active consent or legitimate interest in the TCF decision record, counted by identifier. After accepting: consent or legitimate interest; after refusing: legitimate interest. Data: data/runs/onet/auto/desktop/*/result.json, field m3_by_state. [↗](#)
3. Browser pass, 2 September 2026: the bulk objection toggle in the section “Sprzeciw na UIA Zaufanych Partnerów” (“Objection to UIA of Trusted Partners”) sits 2,997 pixels down the panel’s inner scroll, about eight screens. Record: data/runs/onet/human/desktop/result.yaml. [↗](#)
4. Automated counter, 4 September 2026, three runs, states: before clicking, after refusal, after acceptance. After acceptance 670 companies in total. Data: data/runs/gazeta/auto/desktop/*/result.json. [↗](#)
5. European Commission, draft Digital Omnibus regulation, COM(2025) 837, 19 November 2025, new Article 88b GDPR; obligation for websites after 24 months from entry into force, for large browsers after 48 months: <https://digital-strategy.ec.europa.eu/en/library/digital-omnibus-regulation-proposal>. Exemption for the media in the Commission staff working document SWD(2025) 836, p. 49: “The obligation for controllers to accept centrally set machine-readable preferences does not apply to the providers of media services”: <https://ec.europa.eu/newsroom/dae/redirection/document/121743>. [↗](#)
6. “Media concerns on the Digital Omnibus”, letter from media industry organisations to ministers ahead of the Telecommunications Council meeting of 9 June 2026, dated 5 June 2026: “Article 88b or any equivalent provisions should therefore be rejected and removed from the scope of the Digital Omnibus”: <https://www.magazinemedi.eu/storage/328/TTE-council-letter-Media-concerns-on-the-Digital-Omnibus.pdf>. [↗](#)
7. Compromise text of the EU Council presidency ST 10677/26 of 18 June 2026, Article 88b deleted in full, in the copy published by noyb: https://noyb.eu/sites/default/files/2026-06/5th_compromise_text_Politico.pdf. That Germany, France and Poland, among others, wanted it removed earlier is reported by noyb, 23 June 2026: <https://noyb.eu/en/eu-member-states-and-google-suddenly-want-keep-cookie-banners>. [↗](#)
8. LinkedIn post of 27 July 2026: <https://lnkd.in/p/eE7TkEAG>. [↗](#)
9. Exit to the internet through a Polish internet provider, on a network classified by ipinfo.io as an ISP, not a data centre. The exit country was checked before every measurement and saved with every run. [↗](#)

10. Browser pass: a separate Chrome 152 installation used only for this study, Polish language, no blockers, no login, controlled by the Claude in Chrome extension. Counter: Chromium driven by a Playwright script, with the `navigator.webdriver` flag left in place, no masking of the automation. ↗
11. WebKit (Safari), 24 March 2020: “Cookies for cross-site resources are now blocked by default across the board”: <https://webkit.org/blog/10218/full-third-party-cookie-blocking-and-more/>. Mozilla (Firefox), 14 June 2022: Total Cookie Protection “works by creating a separate ‘cookie jar’ for each website you visit”, by default for all Firefox users on desktop: <https://blog.mozilla.org/en/mozilla/firefox-rolls-out-total-cookie-protection-by-default-to-all-users-worldwide/>. ↗
12. Automated counter, 4 September 2026: word count of the partner list divided by 200 words per minute, three runs (33.2, 33.2 and 33.0 minutes). Data: `data/runs/onet/auto/desktop/*/result.json`, field `m4`. ↗
13. Browser pass, 2 September 2026: list container 54,388 pixels with 396 visible, 1,298 toggles; the screenshot timed out in three attempts. Record: `data/runs/wp/human/desktop/result.yaml`. ↗
14. Browser pass, 2 September 2026: `data/runs/inpost/human/desktop/result.yaml`. The corrected spelling is visible in the screenshot from Grok’s check, 13 September 2026. ↗
15. Check of 13 September 2026: Grok Bot, its own script in the system Chrome browser, exit from a Polish IP address; the blind measurement stage was closed before it opened my data. Details and scope in the method chapter. ↗
16. Mediapanel, the Polish audience measurement run by Gemius and Polskie Badania Internetu, August 2026, ranking “TOP Internet – Websites”, all devices: onet.pl 13,350,096 real users, reach 45.44%, average time 1h 17m 18s. For comparison interia.pl 13,897,980, wp.pl 13,064,976: <https://gemius.com/blog/mediapanel-results-for-august-2026-internet/>. ↗
17. Automated counter, 4 September 2026, three runs per site, field `m2_clicks_accept` in `data/runs/*/auto/desktop/*/result.json`. For Empik the counter did not measure the acceptance path; Apple, Rossmann, Pyszne.pl and Wikipedia did not show the counter a banner. ↗
18. Browser pass, 2 and 3 September 2026, 42 sites; for the eight sites without that pass the automated counter decides (4 September 2026). Labels verbatim from the records `data/runs/<site>/human/desktop/result.yaml`, field `layer1_buttons`. In the group of global giants, Apple and Wikipedia did not show a banner. ↗
19. The everyday services group, 11 sites: Biedronka, Lidl, Żabka, Rossmann, DOZ.pl, Gemini, mBank, ING, Alior Bank, Empik and Pyszne.pl. Biedronka, DOZ.pl and Empik have no refusal on the first screen. I count the shops Allegro, x-kom, Ceneo and In-Post together with the Polish media. Alior Bank, Empik, ING and Pyszne.pl have only the counter measurement, and its result is shown in Appendix 2. ↗
20. In this report, news sites are portals with their own newsroom: Onet, WP, Interia, Gazeta.pl, Wyborcza, rp.pl, RMF24, naTemat, TVN24, TVP Info and TV Republika. On TV Republika the counter did not finish the measurement, so I have no first-screen result. TVP Info has only the counter measurement. I do not count Wykop, it is a social site. ↗
21. Browser pass, 2 and 3 September 2026: `data/runs/rp/human/desktop/result.yaml`; the correction of the measurement after the first attempt is noted in the same record. The automated counter found this button in all three runs. ↗
22. Browser pass, 2 and 3 September 2026, number of clicks and scrolls to a full refusal: `data/runs/onet/human/desktop/result.yaml`, `data/runs/rmf24/human/desktop/result.yaml`, `data/runs/natemat/human/desktop/result.yaml`. ↗
23. Labels verbatim from the browser pass records, field `layer1_buttons`, e.g. `data/runs/xkom/human/desktop/result.yaml`, `data/runs/ceneo/human/desktop/result.yaml`, `data/runs/olx/human/desktop/result.yaml`. ↗
24. Automated counter, 4 September 2026: 932 vendors with consent in the TCF record after acceptance, three runs. Data: `data/runs/onet/auto/desktop/*/result.json`. ↗
25. Browser pass, 2 and 3 September 2026: `data/runs/onet/human/desktop/result.yaml`, `data/runs/rmf24/human/desktop/result.yaml` (both buttons 324 by 34 pixels, page with overflow: hidden until a decision). ↗
26. Automated counter, 4 September 2026: word count of the partner list divided by 200 words per minute, median of three runs (onet 33.2, gazeta 27.6, wyborcza 22.5, x-kom 20.7 minutes), rounded to a full minute. Data: field `m4` in `data/runs/*/auto/desktop/*/result.json`. ↗

27. Browser pass, 2 September 2026: `data/runs/wp/human/desktop/result.yaml`. The wording of the wall was confirmed independently in Grok's check, 13 September 2026.🔗
28. Browser pass, 2 and 3 September 2026: `data/runs/govpl/human/desktop/result.yaml`, `data/runs/ec/human/desktop/result.yaml`.🔗
29. Browser pass, 2 September 2026: first-layer buttons, refusal with one click, zero toggles on by default, 16 partners on the list, visible entry point for changing the decision, button colours: `data/runs/inpost/human/desktop/result.yaml`. Automated counter, 4 September 2026, three runs: zero third-party cookies after refusal, `results/merged.csv`, column `m6_cookies_third_reject`. The corrected spelling is visible in the screenshot from Grok's check, 13 September 2026.🔗
30. Automated counter, 4 September 2026: domains `google-analytics.com` and Google advertising domains in each of the three runs after a full refusal, `data/runs/inpost/auto/desktop/*/result.json`, field `m6`; counting method in the chapter "Where the traffic goes when you say no".🔗
31. Automated counter, 4 September 2026: Allegro among 13 sites with no traffic to advertising and analytics companies after a full refusal in all three runs; method in the chapter "Where the traffic goes when you say no".🔗
32. Regulation (EU) 2016/679 (GDPR), Art. 6(1)(a) to (f); legitimate interest: point (f). Polish text: <https://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX:32016R0679>.🔗
33. Purpose names from the official Polish translation of the TCF purpose list: <https://vendor-list.consensu.org/v3/purposes-pl.json>. Permitted bases for each purpose: IAB Europe, TCF Policies, Appendix A (purposes 2, 7, 8, 9, 10 and 11: consent or legitimate interest; purposes 1 and 3 to 6: consent only): <https://iabeuropa.eu/iab-europe-transparency-consent-framework-policies/>. Sites with TCF in the sample: `results/merged.csv`, column `m3_vendors_consent`.🔗
34. EDPB, Guidelines 1/2024 on processing of personal data based on Article 6(1)(f) GDPR, version 1.0 for consultation, 8 October 2024, para. 6 (three conditions), paras 71 and 122 (an objection under Art. 21(1) must be justified by a particular situation, in direct marketing it need not): https://www.edpb.europa.eu/system/files/2024-10/edpb_guidelines_202401_legitimateinterest_en.pdf. Quote on objection: GDPR, Art. 21(1).🔗
35. GDPR, Art. 6(1)(f) and Art. 21(1), (2), (3) and (5), Polish text: <https://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX:32016R0679>. The EDPB position on personalised advertising as direct marketing: draft guidelines 1/2024, in the footnote in the section "What the law says".🔗
36. Automated counter, 4 September 2026, `onet.pl` after a full refusal: a request to `pagead2.googlesyndication.com` with a `gdpr_consent` parameter containing the TC string, `data/runs/onet/auto/desktop/*/refuse_full_tc-request.txt`. Reading the record: a `getTCData` call on the `__tcfapi` interface (version 2 of the standard), and when the site does not answer it, `addEventListener` on the same interface.🔗
37. CJEU, judgment of 7 March 2024, C-604/22 IAB Europe, points 1 and 2 of the operative part: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62022CJ0604>.🔗
38. Automated counter, 4 September 2026, three runs, each from a clean browser; lists of vendor identifiers in the TCF record after acceptance and after refusal, consistent across all three runs. The legitimate interest list after acceptance and after refusal is identical, down to the identifier, on each of the six sites. Data: `data/runs/<serwis>/auto/desktop/*/result.json`, field `m3_by_state`.🔗
39. Names and declared purposes from the IAB Global Vendor List, version 174, IAB archive: <https://vendor-list.consensu.org/v3/archives/vendor-list-v174.json>, for the 810 vendors on legitimate interest after refusal in the first run. These are the companies' declarations, not proof of processing.🔗
40. Automated counter, first run of each site: the sum of all distinct vendors on legitimate interest after refusal (815) and their comparison with the vendors active after acceptance.🔗
41. Automated counter, state before any click, first run of each site (432 distinct vendors). The `rmf24.pl` switches: browser pass, 3 September 2026, `data/runs/rmf24/human/desktop/result.yaml`.🔗
42. Automated counter, 4 September 2026, three runs: `data/runs/onet/auto/desktop/*/result.json`. Browser pass, 2 September 2026, the TC string after a full refusal and its decoding (`PurposesConsent = [1]`): `data/runs/onet/human/desktop/result.yaml`. I will still check this claim personally before publication.🔗

43. Publisher segment in the TC string (Publisher TC), decoded from the counter's records, three runs: data/runs/rmf24/auto/desktop/*/result.json, data/runs/onet/auto/desktop/*/result.json; for rmf24.pl also the string from the browser pass, data/runs/rmf24/human/desktop/result.yaml. ↗
44. IAB Tech Lab, "Consent string and vendor list formats v2": in the main part "With TCF v2.2 support for legitimate interest for purpose 3 to 6 has been deprecated. Bits 2 to 5 are required to be set to 0"; the definition of the legitimate interest bit: "1 legitimate interest established [...] and the user has not exercised their Right to Object": <https://github.com/InteractiveAdvertisingBureau/GDPR-Transparency-and-Consent-Framework/blob/master/TCFv2/IAB%20Tech%20Lab%20-%20Consent%20string%20and%20vendor%20list%20formats%20v2.md>. ↗
45. Browser pass, 3 September 2026: data/runs/wyborcza/human/desktop/result.yaml. Counter: data/runs/wyborcza/auto/desktop/*/result.json. ↗
46. Browser pass, 2 and 3 September 2026: data/runs/rmf24/human/desktop/result.yaml, data/runs/natemat/human/desktop/result.yaml, data/runs/onet/human/desktop/result.yaml. ↗
47. Browser pass, 2 September 2026: data/runs/gazeta/human/desktop/result.yaml; counter, 4 September 2026: data/runs/gazeta/auto/desktop/*/result.json. I will still check this claim personally before publication. ↗
48. Automated counter, 4 September 2026: zero in all four fields of the TCF record (vendors and purposes, consent and legitimate interest) in all three runs, with a non-empty record and no paywall. Data: data/runs/<serwis>/auto/desktop/*/result.json. Interia has zero companies after a refusal, but five purposes on legitimate interest stay in its record, so it does not meet the four-zeros condition. ↗
49. CJEU, judgment of 29 July 2019, C-40/17 Fashion ID, point 2 of the operative part and para. 76, still under Directive 95/46, the predecessor of the GDPR: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62017CJ0040>. ↗
50. EDPB, Guidelines 1/2024 on processing of personal data based on Article 6(1)(f) GDPR, version 1.0 for consultation, 8 October 2024, para. 115: https://www.edpb.europa.eu/system/files/2024-10/edpb_guidelines_202401_legitimateinterest_en.pdf. Consultation page, checked on 14 October 2026: "Closed for feedback", comment period "09 October - 20 November 2024", the only document "Guidelines 1/2024 - Version 1.0": https://www.edpb.europa.eu/public-consultations/guidelines-12024-on-processing-of-personal-data-based-on-article-61f-gdpr_en. ↗
51. Act of 12 July 2024, Electronic Communications Law (Dz.U. 2024 item 1221), Article 399(1) and (3), in force since 10 November 2024; previously Article 173 of the Polish telecoms law. It implements Article 5(3) of Directive 2002/58/EC. Quote in my translation: <https://api.sejm.gov.pl/eli/acts/DU/2024/1221/text.html>. ↗
52. CJEU, judgment of 1 October 2019, C-673/17 Planet49, paras 69 and 70 and point 2 of the operative part: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62017CJ0673>. ↗
53. GDPR, Art. 21(5): <https://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX:32016R0679>. ↗
54. Landgericht Berlin, ruling of 24 August 2023, case no. 16 O 420/19 (vzbv v LinkedIn), vzbv press release of 30 October 2023: <https://www.vzbv.de/en/court-prohibits-linkedins-data-privacy-infringements>. German vzbv page: "Das Landgericht Berlin schloss sich der Auffassung des vzbv an, dass die Mitteilung des Unternehmens irreführend war. Sie suggeriere, dass die Benutzung des DNT-Signals rechtlich irrelevant sei und die Beklagte ein solches Signal nicht zu beachten brauche"; next to the case number of the ruling: "nicht rechtskräftig", checked on 14 October 2026: <https://www.vzbv.de/urteile/gericht-untersagt-datenschutzverstoesse-von-linkedin>. ↗
55. Automated counter, 4 September 2026, network traffic records in the states before the click and after a full refusal: data/runs/*/auto/desktop/*/result.json, field m6 (third-party domains in each state). Excluded: no banner in the counter: Apple, Pyszne.pl, Rossmann, Wikipedia; refusal unsuccessful in at least one of the three runs: Amazon, Bild, Reddit, Ryanair, TikTok, TV Republika, and WP, where the refusal ends in a paywall. Example domains: Google advertising doubleclick.net, googlesyndication.com, googleadservices.com; Google Analytics google-analytics.com; Gemius gemius.pl; Meta pixel facebook.net. I do not count Google Tag Manager (googletagmanager.com) as a recipient. The full list of domains with categories, so that you can disagree with it: results/domain-categories.csv. ↗
56. As in the methods footnote, state after a full refusal, three runs per site. ↗

57. Automated counter, 4 September 2026, onet.pl after a full refusal: request to pagead2.googleadsyndication.com with the gdpr_consent parameter containing the TC string, data/runs/onet/auto/desktop/*/refuse_full_tc-request.txt.🔗
58. As in the methods footnote, state before any click, three runs per site.🔗
59. Automated counter, 4 September 2026, median of three runs, field m6.pre.cookies_third: data/runs/onet/auto/desktop/*/result.json and correspondingly for the other sites. I leave out wikipedia.org, where the “third-party cookies” come from wikimedia.org, the same foundation’s own infrastructure.🔗
60. Automated counter, 4 September 2026, three runs: domains google-analytics.com, googlesyndication.com and gemius.pl before the click and after a full refusal, data/runs/doz/auto/desktop/*/result.json, field m6. Google Analytics cookies and Synerise identifiers (_snrs_p, _snrs_puvid, _snrs_sa, _snrs_sb, _snrs_uuid) before the decision and after a full refusal: browser pass, 3 September 2026, data/runs/doz/human/desktop/result.yaml, field observations.🔗
61. Automated counter, 4 September 2026, three runs: before the click 9 cookies, after a full refusal 18 first-party and 7 third-party, data/runs/natemat/auto/desktop/*/result.json, field m6. Browser pass, 3 September 2026: from 9 to 18 cookies, names _fbp, _clck and _clsk, data/runs/natemat/human/desktop/result.yaml, field observations. TCF record after a full refusal: the chapter on legitimate interest.🔗
62. Automated counter, 4 September 2026, three runs: 3 cookies before the click, 1 after the refusal, data/runs/ec/auto/desktop/*/result.json, field m6; cookie names: browser pass, 3 September 2026, data/runs/ec/human/desktop/result.yaml, field observations.🔗
63. Automated counter, all sites, three runs: comparison of cookies before the click and after a full refusal, recognised by names typical of analytics tools (among others _ga, __utm, _pk_, _clck, _fbp). I saw a removal only on the European Commission’s site.🔗
64. European Commission, COM(2025) 837, 19 November 2025: <https://digital-strategy.ec.europa.eu/en/library/digital-omnibus-regulation-proposal>; working document SWD(2025) 836, p. 49 (media exception, standards, “the proposed amendments will not lead to the complete disappearance of cookie banners”): <https://ec.europa.eu/newsroom/dae/redirection/document/121743>. Deadlines, browsers outside SMEs and the media exception in the Commission’s wording as reproduced in the Council text ST 10677/26 of 18 June 2026, pp. 119 and 120, which also shows the deletion: https://noyb.eu/sites/default/files/2026-06/5th_compromise_text_Politico.pdf. Parliament’s work: Legislative Train Schedule, update of 1 August 2026: <https://www.europarl.europa.eu/legislative-train/theme-a-new-plan-for-europe-s-sustainable-prosperity-and-competitiveness/file-digital-package>.🔗
65. Automated counter, 4 September 2026: number of TCF vendors with consent after acceptance, results/merged.csv, column m3_vendors_consent. Legitimate interest list: the chapter “Legitimate interest, or the side entrance”.🔗
66. “Media concerns on the Digital Omnibus”, 5 June 2026, signed by: ACT, AER, AMC, EBU, EGTA, EMMA, ENPA, EPC, News Media Europe: <https://www.magazinemedie.eu/storage/328/TTE-council-letter-Media-concerns-on-the-Digital-Omnibus.pdf>.🔗
67. IAB Europe, Digital Omnibus Position Paper, February 2026: “Article 88b should be deleted, as it revives a repeatedly abandoned concept that is legally flawed, technically unworkable, and economically harmful”: https://iabeurope.eu/wp-content/uploads/IAB-Europe_Digital-Omnibus_Position-Paper_Feb-2026.pdf. IAB Polska, May 2026: “Delete Article 88b [...] As browser-level consent mechanisms risk creating new digital gatekeepers”: https://www.iab.org.pl/wp-content/uploads/2026/05/Digital-Omnibus_-_Alternative-for-the-browser-level-consent-management-Art.-88a-and-88b-.docx-2.pdf.🔗
68. EDPB and EDPS, Joint Opinion 2/2026, 11 February 2026, para. 111: “the EDPB and the EDPS understand that ‘controllers’ refers to any controller that accesses or stores data in the terminal equipment of the data subject (e.g. third party cookie providers), not only the controller providing the online interface”, with a recommendation to clarify this: https://www.edpb.europa.eu/system/files/documents/2026-02/edpb_edps_jointopinion_202602_digitalomnibus_en.pdf.🔗
69. YouTube: results/merged.csv (third-party cookies after acceptance, consent platform), browser pass data/runs/youtube/human/desktop/result.yaml. Traffic after a full refusal: the counter’s network traffic records, 4 September 2026, data/runs/*/auto/desktop/*/result.json, field m6; counted are the 39 sites where the counter saw a banner and completed the refusal in all three runs, and a domain counts when it receives traffic in every run. Google advertis-

ing domains: doubleclick.net, googlesyndication.com, googleadservices.com, adtrafficquality.google. Details in the chapter “Where the traffic goes when you say no”. A request to a domain does not by itself prove that personal data is being processed.↗

70. Implement Consulting Group, “Gone in one click”, 24 March 2026, “An Implement Consulting Group analysis commissioned by Google”. The drop in consents is carried over from data after the introduction of Apple App Tracking Transparency, the amount is advertisers’ revenue from advertising: https://cms.implementconsultinggroup.com/media/uploads/articles/2026/Gone-in-one-click/260325_Gone-in-one-click.pdf.↗
71. StatCounter, browser market share in Poland, all platforms, August 2026: Chrome 61.21 percent: <https://gs.statcounter.com/browser-market-share/all/poland>.↗
72. results/merged.csv: columns m8_cmp, m6_cookies_third_accept, m6_cookies_third_reject, m3_vendors_consent, m1. To be fair: Lidl has a short TCF list, but 26 third-party cookies after acceptance.↗
73. results/merged.csv, column m8_cmp.↗
74. European Commission, SWD(2025) 836, p. 49: “the proposed amendments will not lead to the complete disappearance of cookie banners”: <https://ec.europa.eu/newsroom/dae/redirection/document/121743>.↗
75. BEUC, 24 February 2026: “Support and clarify the new approach of introducing browsers signals into the GDPR”: <https://www.beuc.eu/position-papers/protecting-eu-data-and-privacy-rights-digital-omnibus>. EDPB and EDPS, Joint Opinion 2/2026, para. 108: “strongly welcome proposed Article 88b GDPR”.↗
76. EDPB and EDPS, Joint Opinion 2/2026, chapter 10.2: “the processing of personal data for advertising purposes [...] when accessing media services is most often not conducted by the media service provider alone. This processing is commonly conducted together with third parties”; the same place recommends reconsidering the exception for the media.↗
77. noyb, 23 June 2026: <https://noyb.eu/en/eu-member-states-and-google-suddenly-want-keep-cookie-banners>. Compromise text of the EU Council presidency ST 10677/26, 18 June 2026, Article 88b deleted: https://noyb.eu/sites/default/files/2026-06/5th_compromise_text_Politico.pdf.↗
78. Google, “Effect of disabling third-party cookies on publisher revenue”, 2019: “for the top 500 global publishers, average revenue in the treatment group decreased by 52%, with a median per-publisher decline of 64%”: https://services.google.com/fh/files/misc/disabling_third-party_cookies_publisher_revenue.pdf.↗
79. Automated counter, 4 September 2026, three runs: data/runs/tvn24/auto/desktop/*/result.json, data/runs/tvpinfo/auto/desktop/*/result.json; number of partners after acceptance: results/merged.csv, column m3_vendors_consent.↗
80. European Commission, SWD(2025) 836: exception from consent for, among others, “audience measurement when carried out by a media service provider under data protection safeguards” (p. 48) and the exclusion of media from the obligation to honour the signal (p. 49): <https://ec.europa.eu/newsroom/dae/redirection/document/121743>.↗
81. Implement Consulting Group, “Gone in one click”, 24 March 2026, analysis commissioned by Google: “Browser-level consent cuts cookie consent rates by at least 60–65% and reduces ad effectiveness, costing European businesses a third of their ad revenue, or EUR 40–50 billion”; the drop in consents is based on “evidence from the introduction of Apple’s recent app-by-app consent (ATT)”: https://cms.implementconsultinggroup.com/media/uploads/articles/2026/Gone-in-one-click/260325_Gone-in-one-click.pdf.↗
82. Utz, Degeling, Fahl, Schaub, Holz, “(Un)informed Consent: Studying GDPR Consent Notices in the Field”, ACM CCS 2019, table 2: banner with categories on a German online shop, among people who made a decision; each visitor saw one variant: <https://arxiv.org/pdf/1909.02638>.↗
83. IAB Polska, May 2026: “With most users relying on a handful of browsers, this approach effectively hands gatekeepers influence over Europe’s consent framework”: https://www.iab.org.pl/wp-content/uploads/2026/05/Digital-Omnibus-_Al-ternative-for-the-browser-level-consent-management-Art.-88a-and-88b-.docx-2.pdf.↗
84. StatCounter, Poland, all platforms, August 2026: Chrome 61.21 percent: <https://gs.statcounter.com/browser-market-share/all/poland>.↗

85. European Commission, SWD(2025) 836, p. 49: the obligation “should be accompanied by the development of standards”, so that sites and signal providers have “a ‘common vocabulary’ of processing purposes and use the same technical specifications”: <https://ec.europa.eu/newsroom/dae/redirection/document/121743>.²
86. “Media concerns on the Digital Omnibus”, 5 June 2026: “Instead of simplifying rules, the Digital Omnibus introduces additional requirements and restrictions”; Article 88b “warrant further discussions and an impact assessment”: <https://www.magazinemedi.eu/storage/328/TTE-council-letter-Media-concerns-on-the-Digital-Omnibus.pdf>.²
87. IAB Europe, February 2026: “the root cause of banner proliferation: the excessive reliance on consent as the legal base for all but a few cookie uses without regard to actual risk of harm”: https://iabeuropa.eu/wp-content/uploads/IAB-Europe_Digital-Omnibus_Position-Paper_Feb-2026.pdf.²
88. EDPB, opinion 08/2024, 17 April 2024, on “consent or pay” models of large online platforms: https://www.edpb.europa.eu/news/news/2024/edpb-consent-or-pay-models-should-offer-real-choice_en.²
89. European Commission, IP/25/1085, 23 April 2025: Meta breached the DMA obligation “to give consumers the choice of a service that uses less of their personal data”, fine of 200 million euros: https://ec.europa.eu/commission/presscorner/detail/en/ip_25_1085.²
90. CJEU, judgment of 4 July 2023, C-252/21 Meta Platforms v Bundeskartellamt, para. 150: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62021CJ0252>.²
91. GDPR, Article 7(3), English text: <https://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX:32016R0679>.²
92. Browser pass, 2 and 3 September 2026, 42 sites: after the decision the whole page was searched, without logging in; field `m9_withdraw_entry_visible` in `data/runs/<serwis>/human/desktop/result.yaml`, collected in `results/merged.csv`, column `m9_withdraw`. Exception: for Biedronka the browser pass record says “none”, but the counter’s screenshots show a floating icon (footnote at Biedronka), so I count it as a site with an entry. The counter’s screenshots after acceptance from 4 September for the 13 listed sites do not show a floating consent icon (on Filmweb an ad covers the screenshot). An entry in the account settings after logging in was not checked.²
93. Browser pass, 2 September 2026: `data/runs/msn/human/desktop/result.yaml`. Banner quote (Polish original): `data/runs/msn/human/desktop/msn_desktop_02-layer1_20260902.png`.²
94. Browser pass, 3 September 2026: the whole page (8,419 pixels) and the left column with its own scrolling were searched; `data/runs/wykop/human/desktop/result.yaml`. Banner quote (Polish original): automated counter, 4 September 2026, `data/runs/wykop/auto/desktop/*/wykop_desktop_01-landing_20260904.png`; where the square bracket is, the banner shows a gear symbol.²
95. Browser pass, 3 September 2026: scan of the whole home page after a full refusal (10,979 pixels), `data/runs/filmweb/human/desktop/result.yaml`. Full banner quote (my translation): “You can withdraw your consent or object to processing based on legitimate interest at any time by clicking ‘Dowiedz się więcej’ (‘Find out more’) or by going to the Ustawienia prywatności tab on our site”, automated counter, 4 September 2026, `data/runs/filmweb/auto/desktop/*/filmweb_desktop_01-landing_20260904.png`.²
96. Browser pass, 2 September 2026: `data/runs/interia/human/desktop/result.yaml`. The footer link is at 23,211 pixels on a page 23,263 pixels tall.²
97. Browser pass, 2 and 3 September 2026, position of the entry to the consent settings from the top of the page: `data/runs/tvn24/human/desktop/result.yaml` (page 30,313 pixels), `data/runs/bild/human/desktop/result.yaml` (27,936), `data/runs/interia/human/desktop/result.yaml`, `data/runs/gazeta/human/desktop/result.yaml` (22,899), `data/runs/ikea/human/desktop/result.yaml` (13,750), `data/runs/wapo/human/desktop/result.yaml` (13,528). Window height 986 pixels; screens are the position divided by the window height, rounded.²
98. Browser pass, 3 September 2026: icon 45 by 45 pixels, `data/runs/zabka/human/desktop/result.yaml`.²
99. Automated counter, 4 September 2026: icon visible in the bottom-left corner after refusal and after acceptance, `data/runs/biedronka/auto/desktop/*/biedronka_desktop_05-after-reject_20260904.png`, `data/runs/biedronka/auto/desktop/*/biedronka_desktop_06-after-accept_20260904.png`. The same icon on the site on 14 September 2026 (author’s screenshot). The browser pass record from 2 September (`data/runs/biedronka/human/desktop/result.yaml`) did not note it; the discrepancy is described in the file of discrepancies between instruments.²

100. Browser pass, 3 September 2026: “ustawienia cookie” link in the footer, data/runs/mbank/human/desktop/result.yaml. Banner quote (Polish original): automated counter, 4 September 2026, data/runs/mbank/auto/desktop/*/mbank_desktop_01-landing_20260904.png.↗
101. Browser pass, 3 September 2026: link at 3,147 pixels on a page 3,505 pixels tall, data/runs/govpl/human/desktop/result.yaml.↗
102. W3C, Tracking Preference Expression (DNT), Working Group Note, 17 January 2019: “there has not been sufficient deployment of these extensions (as defined) to justify further advancement, nor have there been indications of planned support among user agents, third parties, and the ecosystem at large”: <https://www.w3.org/TR/2019/NOTE-tracking-dnt-20190117>.↗
103. California Code of Regulations, Title 11, § 7025(b): “A business that sells or shares personal information shall process any opt-out preference signal that meets the following requirements as a valid request to opt-out of sale/sharing”: <https://law.cornell.edu/regulations/california/11-CCR-7025>.↗
104. California Attorney General, press release of 24 August 2022: <https://oag.ca.gov/news/press-releases/attorney-general-bonta-announces-settlement-sephora-part-ongoing-enforcement>.↗
105. Colorado Attorney General: “Beginning July 1, 2024, businesses falling within the CPA’s application thresholds must allow Consumers to opt-out of the Sale of their Personal Data or use of their Personal Data for Targeted Advertising using GPC”: <https://coag.gov/opt-out/>.↗
106. GDPR, Article 21(5): <https://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX:32016R0679>. Landgericht Berlin, judgment of 24 August 2023, case no. 16 O 420/19, first-instance judgment: <https://www.vzbv.de/en/court-prohibits-linkedins-data-privacy-infringements>.↗
107. W3C, Global Privacy Control (GPC), draft specification: “This document defines a signal, transmitted over HTTP and through the DOM”; header field “Sec-GPC”: <https://w3c.github.io/gpc/>.↗
108. Draft Article 88b(3), (5), (6) and (7) in the Commission’s wording, reproduced in Council text ST 10677/26, pp. 119 and 120: “Paragraphs 1 and 2 shall apply from [...] 24 months following the date of entry into force”, “Providers of web browsers, which are not SMEs, shall provide the technical means”, “Paragraph 6 shall apply from [...] 48 months”, “Paragraphs 1 and 2 shall not apply to controllers that are media service providers when providing a media service”: https://noyb.eu/sites/default/files/2026-06/5th_compromise_text_Politico.pdf. Commission proposal: <https://digital-strategy.ec.europa.eu/en/library/digital-omnibus-regulation-proposal>.↗
109. Proposal COM(2025) 837, Article 3(15), Article 88a(4)(a) and (c): <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52025PC0837>. Joint statement of media organisations of 6 May 2026: “delete Art. 88a(4) and Art. 88b”: <https://www.egta.com/wp-content/uploads/eu/2026-05-06-Media-Joint-Statement-Digital-Omnibus.pdf>.↗
110. EU Council, ST 10677/26, 18 June 2026, presidency compromise text, pp. 119 and 120, copy published by noyb: https://noyb.eu/sites/default/files/2026-06/5th_compromise_text_Politico.pdf.↗
111. EU Council, ST 10677/26, 18 June 2026, pp. 117 to 120 (Article 88a struck out) and 129 to 130 (Article 5(3) of Directive 2002/58/EC): https://noyb.eu/sites/default/files/2026-06/5th_compromise_text_Politico.pdf. ST 12535/26, 3 September 2026, pp. 124 and 138: <https://data.consilium.europa.eu/doc/document/ST-12535-2026-INIT/en/pdf>.↗
112. European Parliament, Legislative Train Schedule, “Digital package”, updated 1 August 2026: <https://www.europarl.europa.eu/legislative-train/theme-a-new-plan-for-europe-s-sustainable-prosperity-and-competitiveness/file-digital-package>.↗
113. Open letter of the Kill the Cookie Banner coalition, 10 September 2026: “We therefore call on the Irish presidency, ambassador Aineal O’Donoghue, to re-insert Article 88b into their next compromise text”: <https://noyb.eu/en/open-letter-civil-society-coalition-urges-eu-kill-cookie-banner>.↗
114. killthecookiebanner.eu, as of 14 September 2026: “Contact your relevant representative in the European Parliament or national government and express your frustration!”: <https://killthecookiebanner.eu/>.↗
115. Open letter of the Kill the Cookie Banner coalition, 10 September 2026: Article 88b is “the only ‘simplification’ measure that would actually benefit people in this package of mainly business-oriented and protection-reducing measures”: <https://noyb.eu/en/open-letter-civil-society-coalition-urges-eu-kill-cookie-banner>.↗

116. Browser pass, 2 September 2026, observation for 40 seconds: `data/runs/apple/human/desktop/result.yaml`. Automated counter, 4 September 2026, three runs, in all states one cookie and no third-party ones: `data/runs/apple/auto/desktop/*/result.json`, field `m6`.[↗](#)
117. Browser pass, 3 September 2026: `data/runs/rossmann/human/desktop/result.yaml`; wording with Polish characters from the author's screenshot, 14 September 2026. The counter did not see a banner on Rossmann. I do not quote the identifier value.[↗](#)
118. Author's screenshots, 14 September 2026: the "Uzasadniony interes" tab in its default state and with two switches flipped by the author. Default state consistent with the browser pass, 3 September 2026: `data/runs/rmf24/human/desktop/result.yaml`.[↗](#)
119. Browser pass, 2 and 3 September 2026, X test and refusal path: `data/runs/reddit/human/desktop/result.yaml`. After accepting, the counter additionally sees the cookie `ads_cookie`, so accepting can be told apart from refusing, but refusing cannot be told apart from the X.[↗](#)
120. Automated counter, 4 September 2026: `data/runs/youtube/auto/desktop/*/youtube_desktop_05-after-reject_20260904.png` and `data/runs/youtube/auto/desktop/*/youtube_desktop_06-after-accept_20260904.png`. The same message after refusal in the browser pass, 2 September 2026: `data/runs/youtube/human/desktop/youtube_desktop_05-after-reject_20260902.png`.[↗](#)
121. Automated counter, 4 September 2026, second layer (consent.youtube.com): `data/runs/youtube/auto/desktop/*/dom_layer2.html`.[↗](#)
122. Browser pass, 2 September 2026: `data/runs/wapo/human/desktop/result.yaml`, `data/runs/amazon/human/desktop/result.yaml`. Washington Post banner in English: `data/runs/wapo/human/desktop/wapo_desktop_02-layer1_20260902.png`.[↗](#)
123. Browser pass, 2 and 3 September 2026: `data/runs/xkom/human/desktop/xkom_desktop_02-layer1_20260902.png`, `data/runs/zalando/human/desktop/zalando_desktop_02-layer1_20260902.png`. mBank, second layer of the banner: automated counter, 4 September 2026, `data/runs/mbank/auto/desktop/*/dom_layer2.html`.[↗](#)
124. Automated counter, 4 September 2026, three runs per site, started from 17:27 (TV Republika) to 17:34 (TVP Info): `data/runs/tvrepublika/auto/desktop/*/result.json`, `data/runs/tvpinfo/auto/desktop/*/result.json`, field `started_at`. Neither site had a browser pass.[↗](#)
125. Automated counter, 4 September 2026, first screen of the banner, three runs: `data/runs/tvrepublika/auto/desktop/*/tvrepublika_desktop_01-landing_20260904.png` ("672 partnerów", i.e. 672 partners), `data/runs/tvpinfo/auto/desktop/*/tvpinfo_desktop_01-landing_20260904.png` ("130 Zaufani Partnerzy IAB", i.e. 130 Trusted IAB Partners, next to "Zaufani partnerzy TVP", i.e. Trusted TVP partners).[↗](#)
126. Automated counter, 4 September 2026, state after accepting, median of three runs: `results/merged.csv`, columns `m3_vendors_consent`, `m3_vendors_li` and `m4_minutes` (partner list, 200 words per minute). On both sites all three runs gave the same company counts.[↗](#)
127. Automated counter, 4 September 2026, state after accepting: `results/merged.csv`, columns `m6_cookies_third_accept` and `m6_hosts_third_accept` (median of three runs). Individual runs, field `m6.accept.cookies_third` in `data/runs/*/auto/desktop/*/result.json`: TV Republika 359, 353, 363; TVP Info 7, 7, 32.[↗](#)
128. Automated counter, 4 September 2026, three runs: `data/runs/tvpinfo/auto/desktop/*/result.json`, fields `m2_refuse_path` and `m3_by_state.reject`; `data/runs/tvrepublika/auto/desktop/*/result.json`, field `discrepancy_notes` (refusal path unfinished in 3 of 3 runs).[↗](#)
129. Browser pass: 26 sites on 2 September 2026, 16 sites on 3 September 2026. Chrome 152 on Windows 11, Polish language, no blockers, driven by the Claude in Chrome extension. The state after the decision was read from the IAB TCF interface (`__tcfapi`), and on sites without TCF from consent cookies or the browser's local storage. Records and screenshots: `data/runs/<serwis>/human/desktop/`.[↗](#)

130. Automated counter, 4 September 2026, 50 sites with three runs each: Chromium 151 driven by Playwright, window 1920 by 1080 pixels, the `navigator.webdriver` flag left in place, no masking of the automation. Data of each run: `data/runs/*/auto/desktop/*/result.json`, with screenshots alongside. [↗](#)
131. `results/merged.csv`, columns `source_m1` and `source_m2` (where the refusal on the first screen and the click count come from). Counter only: Alior, Empik, ING, Pyszne.pl, Ryanair, TVP Info, TV Republika, Wikipedia. [↗](#)
132. Polish internet provider, an ISP-type network according to the `ipinfo.io` classification. The same exit address is recorded in all 42 records of the pass and in all runs of the counter; I removed the address from the published data. [↗](#)
133. Counter, 4 September 2026: the full refusal on both sites ends at “NIE WYRAŻAM ZGODY” (“I DO NOT CONSENT”), the objection was not found in any run, `data/runs/onet/auto/desktop/*/result.json`, `data/runs/wyborcza/auto/desktop/*/result.json`. Browser pass: `data/runs/onet/human/desktop/result.yaml` (2 September), `data/runs/wyborcza/human/desktop/result.yaml` (3 September). [↗](#)
134. Browser pass, 3 September 2026: `data/runs/ceneo/human/desktop/result.yaml`. Counter, 4 September 2026, refusal path “Nie zgadzam się”, “ZAPISZ” in all three runs: `data/runs/ceneo/auto/desktop/*/result.json`. [↗](#)
135. Browser pass, 3 September 2026, buttons “Zgoda na wszystkie” (“Consent to all”), “Zarządzaj zgodami” (“Manage consents”), “Odrzuć wszystkie” (“Reject all”): `data/runs/rossmann/human/desktop/result.yaml`. Counter, 4 September 2026, no banner in three runs: `data/runs/rossmann/auto/desktop/*/result.json`. [↗](#)
136. Counter, 4 September 2026: a site enters the traffic count when the counter saw the banner and completed the refusal in each of the three runs. No banner: Apple, Pyszne.pl, Rossmann, Wikipedia. Details in the chapter “Where the traffic goes when you say no”. [↗](#)
137. Browser pass: `data/runs/rp/human/desktop/result.yaml`, correction in the notes (“pomiar poprawiony po pierwszym błędzie”, i.e. “measurement corrected after the first error”). Counter: `data/runs/rp/auto/desktop/*/result.json`. [↗](#)
138. Counter screenshots, 4 September 2026: `data/runs/biedronka/auto/desktop*/biedronka_desktop_05-after-reject_20260904.png`, `data/runs/biedronka/auto/desktop*/biedronka_desktop_06-after-accept_20260904.png`. Incorrect record of the pass: `data/runs/biedronka/human/desktop/result.yaml`, field `m9_withdraw_entry_visible`. Details in the chapter on withdrawing consent. [↗](#)
139. Grok Bot (xAI), 13 September 2026: exit through the same Polish connection, Chrome 152 on the same Windows 11 computer, driven by its own script over the DevTools protocol, a new temporary profile for every session. Instruction: first a blind measurement from the list of sites alone, then a comparison with the report and the data. According to file write times, the last measurement file was created a few minutes before the first comparison file. [↗](#)
140. Grok’s measurement table of 13 September 2026 compared with `results/merged.csv`, column `m3_vendors_consent`. Exact match: Allegro, Gazeta.pl, Lidl, MSN, naTemat, OLX, rp.pl, Spotify, TVN24, TVP Info, TV Republika, Wykop. Difference: Onet 935 vs 932, RMF24 937 vs 935, WP 937 vs 935, Wyborcza 803 vs 801. Grok’s verdicts on the earlier version of the text: 14 confirmed, 24 confirmed with a remark, 2 interpretations, 5 unchecked, 2 not checkable, 1 change on the site. [↗](#)
141. `results/domain-categories.csv`. On the limits of both measures: the chapters “Legitimate interest, or the side entrance” and “Where the traffic goes when you say no”. [↗](#)
142. <https://headflash.news/about/>. [↗](#)
143. Checked on 14 October 2026 in a clean Chromium browser, without logging in: the home page and the “O nas” (“About us”) page store no cookies and no data in the browser’s local storage; apart from HeadFlash.news itself, requests go only to `static.cloudflareinsights.com` and `cloudflareinsights.com`. [↗](#)