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9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF SAN FRANCISCO

12 **THE PEOPLE OF THE STATE OF**
13 **CALIFORNIA,**

Plaintiff,

15 **LYFT, INC.,**

Defendant.

Case No.

CGC-26-641775

**COMPLAINT FOR INJUNCTION, CIVIL
PENALTIES, AND OTHER EQUITABLE
RELIEF**

(Civ. Code, § 1798.100 et seq.;
Bus & Prof. Code, § 17200 et seq.)

The People of the State of California, through Attorney General Rob Bonta, bring this action against Lyft, Inc. (“Lyft”) for violations of California’s consumer protection laws. The People allege the following facts based on information and belief:

INTRODUCTION

1. In the past decade, the gig economy evolved into a dominant force in the labor market, shifting consumer behavior to rely on app-based platforms to find gig workers in lieu of traditional services such as hailing a cab, hiring a handyman, or arranging a pet sitter. Operators of these apps can gain access to troves of personal information about customers and workers alike, including geolocation data, enabling them to, among other things, run highly targeted, location-based advertising within and outside their apps. Lyft, an established rideshare company, collected and shared the personal information of both riders and drivers with third parties to target them with personalized ads.

2. California’s comprehensive data privacy law, the California Consumer Privacy Act (“CCPA”), puts consumers back into the driver’s seat when it comes to their data. The CCPA requires businesses to provide consumers with an effective mechanism to opt out of the sale or sharing of their data. To pave the way for consumers to exercise this right, the opt-out mechanism must reflect how the business primarily interacts with consumers and should require minimal steps—a business offering its services through a mobile app must provide an easy-to-execute opt-out method within that app. Despite offering its services exclusively through its mobile app, Lyft did not provide riders or drivers with an in-app opt-out method – effectively denying consumers the right to easily stop the sale and sharing of their personal information. Instead, Lyft sent consumers trying to exercise their opt-out rights on a meandering ride out of the app and into their mobile device browsers, where consumers were required to click through multiple screens and resubmit information to verify their identities before they could tell Lyft to stop selling their data.

PARTIES

3. Plaintiff, the People of the State of California, brings this action by and through Rob Bonta, Attorney General of the State of California. The Attorney General is authorized by Civil

1 Code § 1798.199.90 to bring actions to enforce the California Consumer Privacy Act and by
2 Business and Professions Code §§ 17204 and 17206 to bring actions to enforce the Unfair
3 Competition Law.

4 4. Defendant, Lyft, Inc., is a Delaware corporation headquartered in San Francisco, CA.

5 **JURISDICTION AND VENUE**

6 5. Lyft has conducted and continues to conduct business within the State of California,
7 including the County of San Francisco, at all times relevant to this complaint. The violations of
8 law alleged herein were committed or occurred in the County of San Francisco, and elsewhere in
9 the State of California.

10 **FACTUAL ALLEGATIONS**

11 6. Lyft is a ride-sharing company that exclusively offers its services through its mobile
12 app. Lyft's dual-sided platform connects riders seeking transportation with drivers who are
13 registered on the platform. To use Lyft, riders and drivers must download either the Lyft app or
14 the Lyft Driver app and create an account. Individuals who use Lyft as both riders and drivers
15 have a single account that links their passenger and driver profiles, and they use the same account
16 credentials for both the Lyft and the Lyft Driver apps. Personal information collected about a
17 driver during work is therefore connected to the driver's passenger profile.

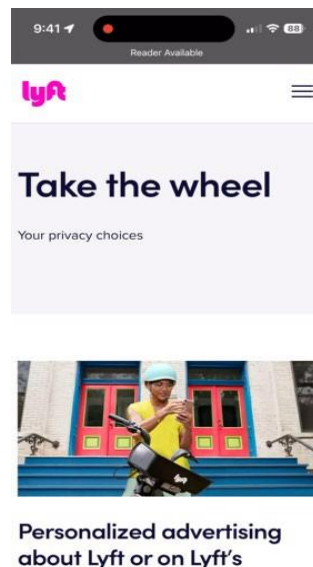
18 7. To provide its services, Lyft collects significant amounts of personal information
19 through both driver and rider apps, including consumer names, phone numbers, device identifiers,
20 IP addresses, and geolocation data to provide its services. Starting in mid-2023, Lyft began
21 disclosing some of this information, such as device identifiers, IP addresses, and coarse
22 geolocation data, to third parties to personally target ads to Lyft passengers, including California
23 consumers. The data that Lyft disclosed allowed the company to charge more for the
24 advertisements on its app and created a new revenue stream for Lyft. These data disclosures also
25 triggered consumers' opt-out rights under the CCPA.

26 8. The CCPA's opt-out right vests a consumer with the right to tell a business to stop
27 selling and sharing their personal information. To effectuate this right, businesses are required to
28 provide an easy-to-execute opt-out mechanism that reflects how the business primarily interacts

1 with the consumer. Lyft, as an exclusively app-based service, was thus legally required to
2 provide an app-based opt-out mechanism.

3 9. In 2025, the Attorney General conducted an investigative sweep regarding apps, ad-
4 networks, and data brokers that focused on their collection, use, and sale of consumer geolocation
5 data. The CCPA and other consumer privacy frameworks place heightened protections on
6 geolocation data, especially precise geolocation data, because it is often highly detailed, granular,
7 and can reveal intimate details about consumers' movements and lives. As part of the sweep, the
8 Attorney General found that while Lyft did not sell or share consumers' precise geolocation
9 information, Lyft did sell or share customers coarse geolocation, and its apps did not contain
10 CCPA-compliant opt-outs. Specifically, Lyft failed to provide any native in-app setting or
11 control that would allow a consumer to opt-out from within the app.

12 10. Lyft also placed significant roadblocks in front of consumers attempting to exercise
13 their opt-out rights from within Lyft's apps by requiring consumers to complete unnecessary steps
14 and provide redundant information. The only way for a consumer to learn about their opt-out
15 rights and access Lyft's opt-out from within the Lyft app was to navigate through a series of links
16 embedded within Lyft's in-app Privacy Policy to access Lyft's "Do Not Sell or Share My
17 Personal Information" webpage on a mobile browser, as shown in Figures 1 and 2.



28 *Figure 1*

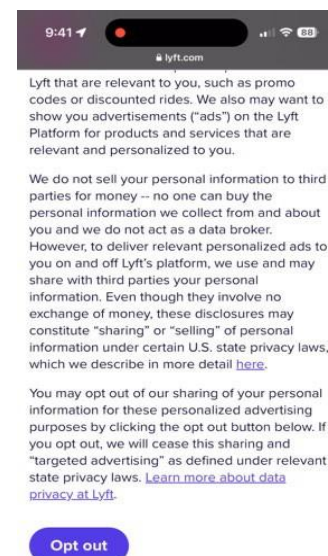


Figure 2

11. But clicking the “opt-out” button shown in Figure 2 wasn’t the end of the journey. Lyft then required consumers to resubmit their login credentials and verify their identity before effectuating the opt-out, even though consumers were already logged into Lyft’s app and Lyft knew the consumers’ identities. If Lyft and other gig-economy businesses can make their services available with just a tap in an app, they can and must allow consumers to opt-out with the same ease.

FIRST CAUSE OF ACTION

**FOR VIOLATIONS OF THE CALIFORNIA CONSUMER PRIVACY ACT,
CIVIL CODE SECTION 1798.100 ET SEQ.**

12. The People reallege and incorporate by reference each of the paragraphs above as though fully set forth herein.

13. Lyft has engaged in acts or practices that violated the CCPA and its implementing regulations within the meaning of Civil Code section 1798.199.90. These acts or practices include, but are not limited to, the following:

- a. Failing to provide an easy-to-use method for submitting requests to opt-out of sale/sharing reflecting the manner in which the business primarily interacts with its consumers. (Civ. Code, § 1798.120, subd. (a); Cal. Code Regs., tit. 11, § 702(a).)
- b. Failing to provide methods for submitting requests to opt-out of sale/sharing that are easy for consumers to execute, require minimal steps, and do not ask consumers to provide additional information beyond what is necessary to effectuate the opt-out. (Civ. Code, §§ 1798.120, subd. (a), 1798.135, subds. (a), (c)(1); Cal. Code Regs., §§ 7013(a), 7026(b).)

SECOND CAUSE OF ACTION

**FOR VIOLATIONS OF THE UNFAIR COMPETITION LAW,
BUSINESS AND PROFESSIONS CODE SECTION 17200 ET SEQ.**

14. The People reallege and incorporate by reference each of the paragraphs above as though fully set forth herein.

15. Lyft has engaged in unlawful, unfair, or fraudulent acts or practices, which constitute unfair competition within the meaning of Section 17200 of the Business and Professions Code. These acts may include but are not limited to violations of the following:

- a. Civil Code section 1798.120, subdivisions (a) and (b);
- b. Civil Code section 1798.135, subdivisions (a)(1) and (a)(3); and
- c. California Code of Regulations, title 11, sections 7013 and 7026.

PRAYER FOR RELIEF

WHEREFORE, the People pray for judgment as follows:

1. Pursuant to Civil Code section 1798.199.90, that the Court enter an injunction to prevent Lyft, as well as their successors, agents, representatives, employees, and all persons who act in concert with them from engaging in any act or practice that violates CCPA, including, but not limited to, as alleged in this Complaint;

2. Pursuant to Civil Code section 1798.199.90, that the Court assess civil penalties of two thousand six hundred sixty-three dollars (\$2,663) for each violation of CCPA, or seven thousand nine hundred eighty-eight dollars (\$7,988) for each intentional violation and each violation involving the personal information of minor consumers, as proven at trial;

3. Pursuant to Business and Professions Code section 17203, that the Court enter an injunction and make such orders or judgments as may be necessary to prevent Lyft, as well as their successors, agents, representatives, employees, and all persons who act in concert with them from engaging in any act or practice which constitutes unfair competition;

4. Pursuant to Business and Professions Code section 17203, that the Court make such orders or judgments as may be necessary to restore any person in interest any money or property which may have been acquired by means of unfair competition in an amount according to proof;

5. Pursuant to Business and Professions Code section 17206, that the Court assess civil penalties of two thousand five hundred dollars (\$2,500) against each defendant for each violation of Business and Professions Code section 17200, as proven at trial;

6. Under the authority of Government Code section 12527.6, that the Court award the remedy of disgorgement in an amount according to proof;

1 7. That the People recover their costs of suit; and

2 8. For such other and further relief as the Court deems just and proper.

3 Dated: October 28, 2026

Respectfully submitted,

4 ROB BONTA
5 Attorney General of California

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7 MANEESH SHARMA
8 Deputy Attorney General
9 Attorneys for The People of the State of
10 California¹

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¹ The Attorney General's Office gratefully acknowledges the contributions of Prisca Sielaff, Legal Extern, to the drafting of this complaint.