OneTrust Accessibility Conformance Report WCAG Edition

(Based on VPAT® Version 2.4)

Name of Product/Version	Privacy Rights (DSAR)
Report Date	May 2021
Product Description	OneTrust Privacy Rights enables organizations to streamline their Data Subject Access Requests (DSAR) lifecycle processes by leveraging intake templates, automated workflows, identity verification measures, secure messages portals, database audit preparedness, and Targeted Data Discovery (TDD).
Contact Information	support@onetrust.com
Notes	This report covers WCAG accessibility conformance of the following consumer-facing tools that can be produced and used with this module: • Web Forms • Privacy Portal • Login Screen • Email Notification Templates The main OneTrust admin application has **not** been evaluated for WCAG conformance.
Evaluation Methods Used	OneTrust conducted audits of these consumer-facing areas using both manual and automated testing with accessibility testing tools.

Applicable Standards/Guidelines

This report covers the degree of conformance for the following accessibility standard/guidelines:

Standard/Guideline	Included In Report
[Web Content Accessibility Guidelines 2.0](#)	Level A (**Yes** | No) Level AA (**Yes** | No) Level AAA (Yes | **No**)
[Web Content Accessibility Guidelines 2.1](#)	Level A (**Yes** | No) Level AA (**Yes** | No) Level AAA (Yes | **No**)

Terms

The terms used in the Conformance Level information are defined as follows:

Supports	The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
Partially Supports	Some functionality of the product does not meet the criterion
Does Not Support	The majority of product functionality does not meet the criterion.
Not Applicable	The criterion is not relevant to the product.
Not Evaluated	The product has not been evaluated against the criterion. This can be used only in WCAG 2.0 Level AAA.

WCAG 2.1 Report

Note: When reporting on conformance with the WCAG 2.1 Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the WCAG 2.0 Conformance Requirements.

Table 1: Success Criteria, Level A

Notes:

Criteria	Conformance Level	Remarks & Explanations
1.1.1 Non-text Content (Level A)	Partially Supports	Banner landmarks may not be read aloud on the Request Access Code and Enter Access Code pages.
1.2.1 Audio-only and Video-only (Prerecorded) (Level A)	Not Applicable	Prerecorded audio-only or video-only content is not used.
1.2.2 Captions (Prerecorded) (Level A)	Not Applicable	Prerecorded video content is not used. Any content linked or uploaded into the module is controlled by the uploader. When users upload video files to the content tool, video topics render using a fully accessible video player. This video player supports the ability to upload SRT files that play as closed captions.
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A)	Not Applicable	Prerecorded content is not built into the module. Users uploading content into the module control the content they produce.
1.3.1 Info and Relationships (Level A)	Partially Supports	"List" type element was added to the web form and this is causing issue to be detected. This will be fixed/removed to comply with WCAG Standards. When highlighting "Select a File" button that has "Required" tag on it, the tag may not be read on Android devices.
1.3.2 Meaningful Sequence (Level A)	Supports	
1.3.3 Sensory Characteristics (Level A)	Supports	
1.4.1 Use of Color (Level A)	Supports	
1.4.2 Audio Control (Level A)	Supports	
2.1.1 Keyboard (Level A)	Partially Supports	When focus is moved outside of the modal dialog, keyboard only users or users of screen readers may be able to access content that is not active with the mouse

Criteria	Conformance Level	Remarks & Explanations
		but actionable from the keyboard via the screen reader's virtual cursor. Users of the keyboard may become confused as the visual and programmatic focus is no longer in the dialog and the user is able to interact with inactive elements.
2.1.2 No Keyboard Trap (Level A)	Supports	
2.1.4 Character Key Shortcuts (Level A 2.1 only)	Supports	
2.2.1 Timing Adjustable (Level A)	Supports	
2.2.2 Pause, Stop, Hide (Level A)	Supports	
2.3.1 Three Flashes or Below Threshold (Level A)	Supports	
2.4.1 Bypass Blocks (Level A)	Partially Supports	If Google ReCaptcha is enabled on the form, user may not be able bypass the block in which the ReCaptcha is embedded.
2.4.2 Page Titled (Level A)	Partially Supports	User may have to read a URL because the frame is untitled, preventing them from completing ReCaptcha without a mouse.
2.4.3 Focus Order (Level A)	Partially Supports	The focus order of Bot Detect Captcha may not be correctly ordered on Privacy Portal log in page.
2.4.4 Link Purpose (In Context) (Level A)	Supports	
2.5.1 Pointer Gestures (Level A 2.1 only)	Supports	
2.5.2 Pointer Cancellation (Level A 2.1 only)	Supports	
2.5.3 Label in Name (Level A 2.1 only)	Supports	
2.5.4 Motion Actuation (Level A 2.1 only)	Supports	

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Criteria	Conformance Level	Remarks & Explanations
3.1.1 Language of Page (Level A)	Supports	
3.2.1 On Focus (Level A)	Supports	
3.2.2 On Input (Level A)	Supports	
3.3.1 Error Identification (Level A)	Supports	
3.3.2 Labels or Instructions (Level A)	Partially Supports	Some preview texts may be read aloud twice. When submitting requests to web forms, the following may occur: • Not announce the character count entered in request details field (iOS) • Not announce the delete option in the items selected from multiple drop-down fields. • Not announce expected field as expected if Preview Text added (Android). • Button options are being read as required in the webform instead of button name.
4.1.1 Parsing (Level A)	Partially Supports	Elements which aren't well-informed may prevent users with assistive tool direct navigation access to this content.
4.1.2 Name, Role, Value (Level A)	Partially Supports	When a file submission is not required for the web form, the description field will not be available. WCAG reading tools such as Axe will flag this issue. However, these ARIA labels are required in order for iOS devices with screen readers to properly read the required fields.

Table 2: Success Criteria, Level AA

Notes:

Criteria	Conformance Level	Remarks & Explanations
1.2.4 Captions (Live) (Level AA)	Not Applicable	
1.2.5 Audio Description (Prerecorded) (Level AA)	Not Applicable	
1.3.4 Orientation (Level AA 2.1 only)	Supports	
1.3.5 Identify Input Purpose (Level AA 2.1 only)	Partially Supports	Autocomplete components do not support autofill.
1.4.3 Contrast (Minimum) (Level AA)	Supports	Branding colors have to be configured by the customer.
1.4.4 Resize text (Level AA)	Supports	Supported using the browser zoom feature as set by the customer. OneTrust does not support an in-application zoom feature.
1.4.5 Images of Text (Level AA)	Supports	
1.4.10 Reflow (Level AA 2.1 only)	Supports	
1.4.11 Non-text Contrast (Level AA 2.1 only)	Supports	
1.4.12 Text Spacing (Level AA 2.1 only)	Supports	
1.4.13 Content on Hover or Focus (Level AA 2.1 only)	Supports	
2.4.5 Multiple Ways (Level AA)	Not Applicable	
2.4.6 Headings and Labels (Level AA)	Partially Supports	Currently sections may be incorrectly read aloud as 'Content Information' or omit characters from their given section name when using Safari.
2.4.7 Focus Visible (Level AA)	Partially Supports	Multiple Privacy Portal menus may be incorrectly focused or read more than once resulting from improper swipe actions.
3.1.2 Language of Parts (Level AA)	Supports	

Criteria	Conformance Level	Remarks & Explanations
3.2.3 Consistent Navigation (Level AA)	Supports	
3.2.4 Consistent Identification (Level AA)	Supports	
3.3.3 Error Suggestion (Level AA)	Supports	
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)	Not Applicable	
4.1.3 Status Messages (Level AA 2.1 only)	Supports	

Table 3: Success Criteria, Level AAA

Notes: The OneTrust Privacy Rights module has not been evaluated for WCAG 2.1 Level AAA conformance.

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