

Wish.com

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Regarding deceptive design on your website

To whom it may concern,

The Norwegian Consumer Council (Forbrukerrådet) is an independent consumer interest organization that helps consumers and works to influence public authorities and private enterprises in a consumer-friendly direction.

Over many years, the Consumer Council has documented and analyzed the use of deceptive design, which is used to trick consumers into spending more time and money than planned, or to share more personal data than what is in the consumers' own interests. Deceptive design exploits emotional and cognitive biases, for example by exploiting that people have a tendency to assign higher value to products and services that appear to be valued by others, or that appear scarce.

In the past months, the Consumer Council has looked at websites and apps targeted at Norwegian consumers, and that employ deceptive design patterns. The research has predominately been based on tips and suggestions from Norwegian consumers.

The report containing the results of the research can be found here:

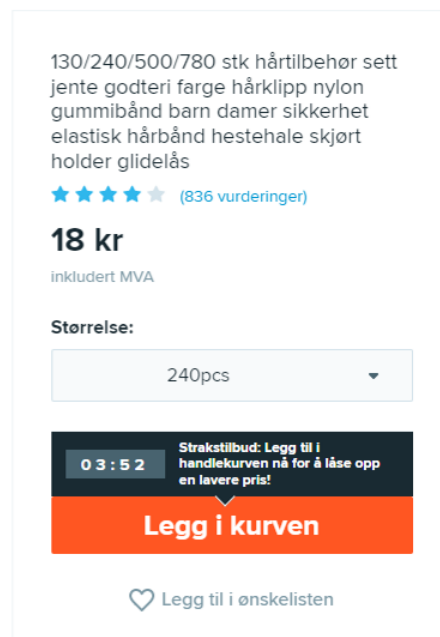
<https://www.forbrukerradet.no/siste-nytt/bruker-design-til-a-lure-oss-for-tid-penger-og-personopplysninger>

Wish is one of the companies that the Consumer Council believes is using deceptive design, which permeates the entire website. It is also worth noting that Wish is one of the most mentioned companies in the consumer survey conducted by the Consumer Council.

For example, Wish is using many instances of countdown timers, which puts pressure on consumers. This happens in relation to the concept "Lynkjøp"



(“Blitz Buy”), which is a type of daily game where consumers are asked to place all of their desired products in their shopping cart at a discount within ten minutes and have to finalize the purchase within a given time to actually receive the discount. This technique exploits that consumers may be afraid of losing the discount or not be able to purchase the product. It is usually impossible for the consumer to know if the countdown is real or not.



When using the Wish.com website, it is not possible to access the shopping basket without creating a user account. This design can be used to make consumers give away more personal data than necessary, both information that must be entered when creating an account, and potentially through subsequent data collection that is connected to the account.



wish

Logg inn eller registrer deg for å se handlekurven din

Logg inn

Registrer deg

Telefonnummer eller e-post	Linn	Etternavn
Passord	Telefonnummer eller e-post	Passord
Glemt passordet?		
Logg inn	Fortsett	

eller fortsett med



Når du klikker på 'Logg inn', 'Registrer deg', 'Facebook', 'Google' eller 'Apple', godtar du Wish bruksvilkår, Les Personvern. Dette nettstedet er beskyttet av reCAPTCHA, og Googles Personvern og Vilkår for bruk gjelder.

[Lukk](#)

Wish also displays various messages about how many customers have ordered various products (e.g. 20 000+) This design pattern gives the consumers an impression that there is a significant interest from other consumers. This has the effect of increasing the value of the product in the eyes of the consumer and may put pressure on the consumer to complete a purchase.



The listed prices are displayed with VAT included, but as far as the Consumer Council can see, customs fees are not included in the listed price. This seems to be the case according to the terms and conditions, where it is stated that the consumer “[acknowledge your responsibility for VAT and customs duties](#)”.



The Wish website also includes various uses of unbalanced choices, where one choice is presented much more prominently than the alternative. This exploits the fact that people are influenced by how a choice is presented.



The user account that the consumer is forced to create in order to purchase anything on Wish.com, cannot be deleted, as far as the Consumer Council can see.

The Consumer Council requests that you go through the aforementioned examples, in addition to other consumer-facing interfaces in your control, and make sure that you no longer use deceptive design. Advice on how to do this can be found in the industry-facing guidelines that are named in the report.

As a part of the Consumer Council mapping of deceptive design, YouGov has conducted a survey of Norwegian Consumers about their attitudes and experiences with deceptive design. The survey shows that consumers react quite negatively to deceptive design, and that many lose trust in businesses that use them. Additionally, many consumers report that they have considered quitting, or actually stopped using websites and apps where they notice the use of deceptive design.

With this letter, the Consumer Council aims to make Wish aware that many of the types of deceptive designs described in the report are, in the Norwegian Consumer Council's view, in breach of several rules and regulations. The relevant legal provisions are described in the report.



The Norwegian Consumer Authority, which enforces the Marketing Control Act and other consumer law in Norway, is in copy on this letter.

We look forward to hearing back from you.

Regards,

Forbrukerrådet

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