

Date: 01/09/2025

To

**The Central Consumer Protection Authority,
("CCPA"),**

Department of Consumer Affairs,
Krishi Bhawan, New Delhi – 110 001.

Email ID: com-ccpa@gov.in

Dear Sir / Madam,

Sub: Self-Declaration on non-indulgence in any Dark Pattern(s)

Ref: (i) CCPA Advisory No. CCPA-1/1/2023-CCPA dt 05 June 2025;
(ii) CCPA Guidelines (F. No. CCPA-1/1/2023-CCPA) for Prevention and Regulation of Dark Patterns, 2023, dt. 30 Nov 2023.

We, William Penn Pvt. Ltd [CIN: U51396KA2007PTC041870] a company registered under the Companies Act, 1956 ("Company"), having its, Registered Office at # 31, 6th Main, 3rd Block, Jayalakshmipuram, Mysuru-570012, and Corporate Head office at # 15, 17th "A" Main, 5th Block, Koramangala, Bengaluru-560095, Karnataka, inter alia, carry on the business of importing branded premium writing instruments ("Products"), distributing and selling, fountain Pens, Rollerball Pens " Sheaffer, Montblanc, Benu, Lamy, Caran D' Ache, Hugo boss, Easter book, Sailor, Cross Novium, Kaweco, lapis Bard, Parker and Accessories" in India. As part of our business, we also sell our Products online through our e-commerce platforms - www.willampenn.net, www.sheaffer.com & www.lapisbard.com.

We write regarding the CCPA Advisory in ref (i) above, recommending e-commerce platforms to (i) take necessary steps to ensure they are not engaging in any deceptive and unfair trade practices classified as Dark Patterns according to the Guidelines in Ref (ii) above (such as False Urgency, Basket Sneaking, Confirm Shaming, Forced Action, Subscription Trap, Interface interference, Bait and switch, Drip Pricing, Disguised Advertisement, Nagging, Trick Question, SaaS Billing, and Rogue Malware); (ii) conduct a self-audit to identify risk patterns and ensure steps are taken to remove such dark patterns; and (iii) provide a self-declaration confirming that e-commerce platforms are free from these practices, based on their self-audit findings.

Corporate Office and
Communication Address:

William Penn Private Limited,
#15, 17th 'A' Main,
5th Block, Koramangala,
Bangalore-560095, Karnataka, India

Regd Office:

William Penn Private Limited,
No. 31, 6th Main, 3rd Block,
Jayalakshmi Puram,
Mysore-570012, Karnataka, India

Contact Details:

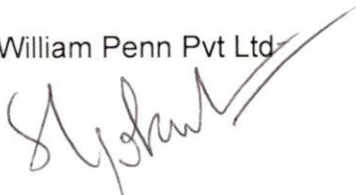
Phone: +91 80-40535555
Email: info@willampenn.net
Website: www.willampenn.net
CIN: U51396KA2007PTC041870

In this regard, we hereby confirm and declare that the Company has conducted a self-audit to identify risk patterns. Further to the afore-mentioned audit, we confirm and declare that our E-commerce Platforms are free from any Dark Pattern(s), and that our Company is not engaging in any Dark Pattern(s).

We hereby request that your office consider and take on record the declaration aforesaid submitted pursuant to our self-audit, and appreciate our Company's compliance with its obligations, as recommended under the Advisory. We place on record our appreciation for the efforts taken by your good office to enable a fair digital ecosystem and to build trust between consumers and e-commerce platforms.

Thanking you,

For William Penn Pvt Ltd



Authorised Signatory

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Communication Address:

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#15, 17th 'A' Main,
5th Block, Koramangala,
Bangalore-560095, Karnataka, India

Regd Office:

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Mysore-570012, Karnataka, India

Contact Details:

Phone: +91 80-40535555
Email: info@williampenn.net
Website: www.williampenn.net
CIN: U51396KA2007PTC041870

Santosh

From: Santosh <santosh@williampenn.net>
Sent: 09 September 2025 14:48
To: 'com-ccpa@gov.in'
Subject: Self-Declaration on non-indulgence in any Dark Pattern(s) - William Penn Pvt Ltd
Attachments: CCPA Complaine William Penn 1SEP25.pdf

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To
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Ref. : William Penn Private Limited

Please find here attached file for –

We are submitting here the, **Self-Declaration on non-indulgence in any Dark Pattern(s) according to CCPA guidelines.**

Request you to kindly accept our submission & acknowledge the receipt of the same

Kind Regards

For William Penn Private Limited

Santosh
Bangalore