



A Brief Guide to the California Consumer Privacy Act (CCPA)

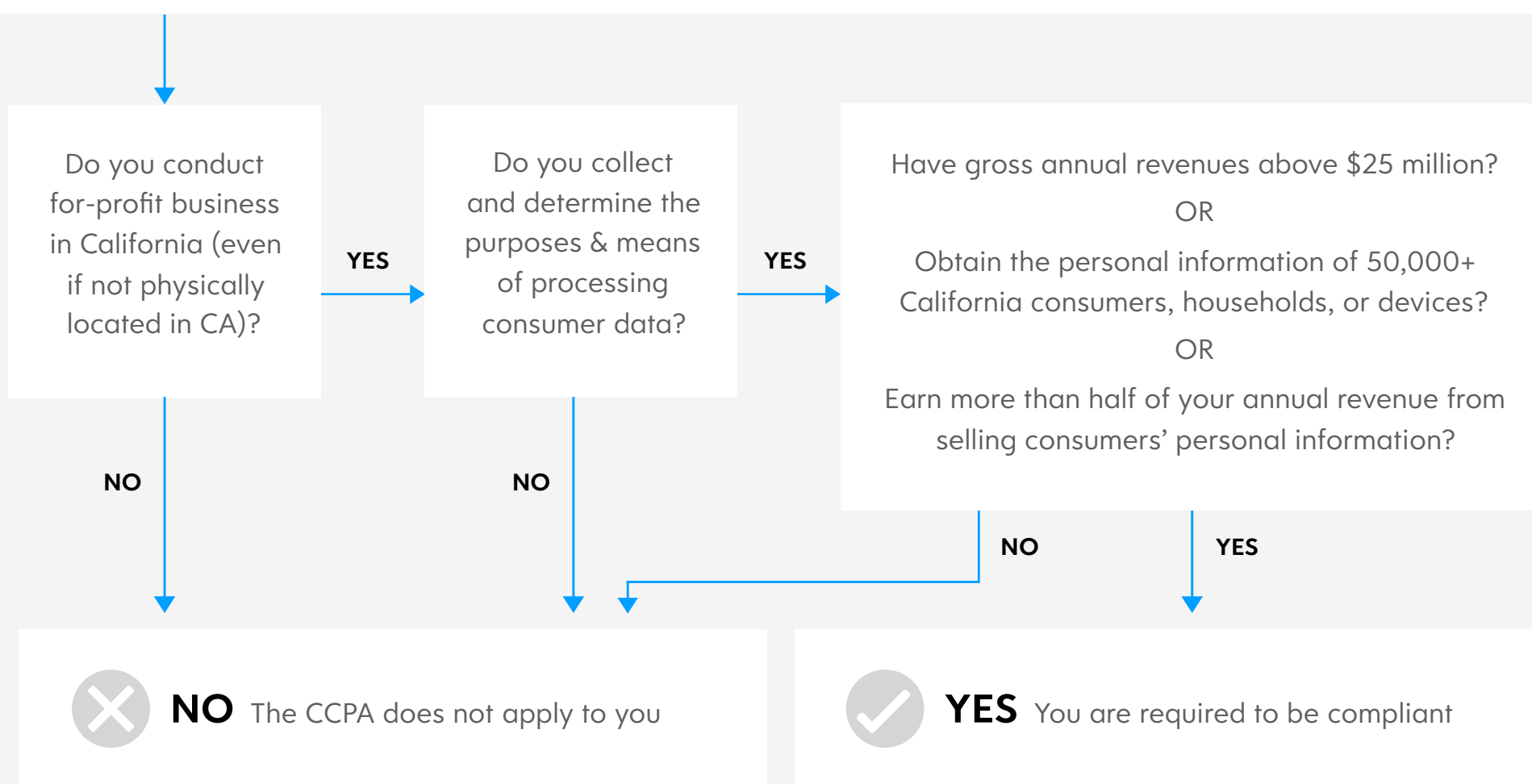
We've assembled this guide to help you understand what the CCPA means to your businesses and what you need to do about it.

WHAT IS IT? The California Consumer Privacy Act (CCPA) is a piece of legislation (enacted in January 2020) that requires certain organizations to provide their customers with the ability to audit, delete, and manage how their personal data is used. All affected organizations must understand and act upon their responsibility for adherence to the CCPA in order to become & remain compliant.








Does the CCPA Apply to Your Business?

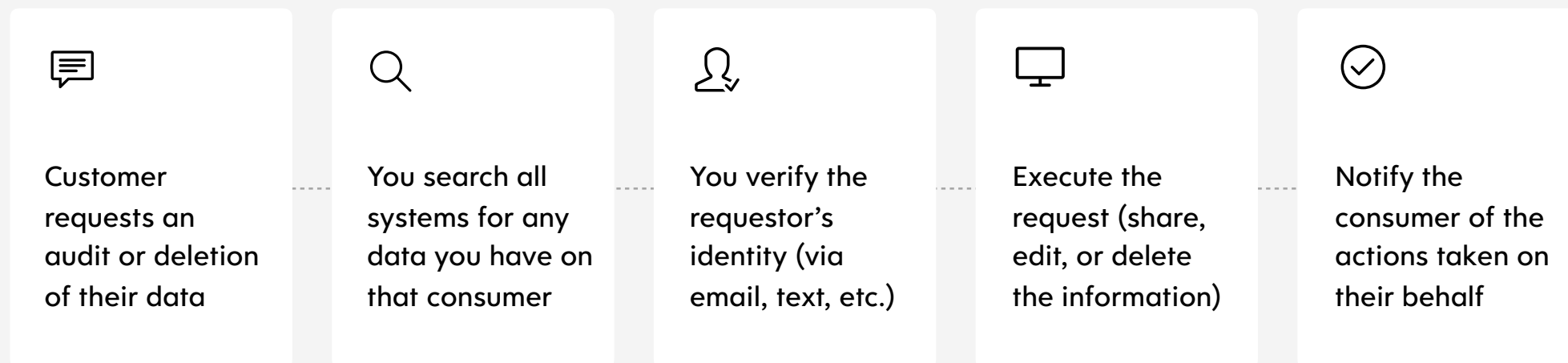
Answer the following questions to determine if you need to be CCPA compliant. There are exceptions to the CCPA, so be sure to verify whether any apply to your organization.



What Rights Does the CCPA Grant to Consumers?

-  **Notice:** Consumers are informed (at or before collection) of the categories & purposes of information you are collecting
-  **Access:** Consumers can request the categories & purposes of information you collect, who it's shared with, and what specific information you have about them
-  **Opt out:** Consumers can direct you to refrain from selling their information to third parties. You cannot sell minors' information without consent from the minor or their guardian
-  **Request deletion:** Consumers can request that you erase the information that you have collected from them
-  **Equal services & prices:** You cannot discriminate against consumers that have exercised their rights under the CCPA (in terms of access, pricing, quality, etc.)

What Does It Look Like?



What Do You Need?

The Attorney General's office will begin the enforcement of the CCPA on **July 1, 2020**. Your organization will need the following things by that time in order to be CCPA compliant:

- Two separate channels through which consumers can submit requests (e.g. website, toll-free number, mail)
- The ability to conduct identity verification of requesting consumers with the data you currently have
- A system & process that enables you to respond to requests within 45 days
- A way to search for and find the data of your consumers across all systems
- The ability to edit, delete, and export data from source tables
- A secure method of sharing consumer data with the requestor (in an accessible, portable format - e.g. pdf, .doc, text)
- An updated Privacy Policy reflecting your process for collecting and sharing consumer information
- If you sell consumer data, a "Do Not Sell My Personal Information" links on your Homepage & in your Privacy Policy
- If you sell minors' data, an opt-in method for minors (age 13-16) or their guardians (for minors under 13) to provide consent

The only way to ensure you are prepared is to have a comprehensive understanding of the legislation, your specific responsibilities for compliance, and a plan specific to your organization for obtaining & maintaining it.

What Are the Risks of Non-Compliance?

The CCPA will be enforced by the California Attorney General, but also accounts for a “private right of action”, wherein consumers can bring an action against the company should they experience “unauthorized access... theft, or disclosure” of their personal information. **Beyond the impact to your brand’s public perception, non-compliance may result in:**



CIVIL PENALTIES:

\$100 - \$750 per user, per violation



CIVIL SUITS:

\$2500 - \$7500 per violation

The information provided in this document does not, and is not intended to, constitute legal advice. CQL recommends consulting an attorney to help you understand your specific requirements & ensure your compliance