

The California Consumer Privacy Act

APPLICATIONS, OBLIGATIONS, AND PATHWAYS TO COMPLIANCE



CCPA THRESHOLDS, DATES, AND PENALTIES

The CCPA was enacted to provide customers that reside in California with greater control over their personal information that companies collect and share. Customers will have the right to know:

- What personal information companies collect
- How companies intend to use their personal information
- With what parties companies share that personal information

THRESHOLDS

The CCPA applies to companies that do business in California and:

1. Have over \$25 million in annual revenue; or
2. Buy, sell, receive, or share personal information of over 50,000 customers; or
3. Make more than 50 percent of their revenue from selling consumers' information

DATES

- January 1, 2020: The CCPA takes effect
- July 2, 2020: California Attorney General expected to issue guidelines

PENALTIES

- The CCPA provides for a private right of action
- California Attorney General can seek a civil penalty of not more than \$2,500 per violation or \$7,500 per each intentional violation





YOUR OBLIGATIONS UNDER THE CCPA AND HOW WE CAN ASSIST

OBLIGATIONS

Obligations under the CCPA will be difficult to meet if you have not taken steps before January 1, 2020, to be in a position to respond to consumer requests. Not sure if you are ready?

Here are just a few questions to ask:

- Can you disclose to each of your customers within 45 days the categories and pieces of personal information you have collected on them?
- If customers request that you delete the information you collected on them, can you do so within 45 days?
- Are you capable of verifying a customer who requests a copy of their personal information or for their personal information to be deleted? (For example, is their name Robert Smith — or is it Bob, or Rob, or perhaps Bobby)?
- Does your webpage have a “Do Not Sell My Personal Information” link that permits a consumer to opt out of the sale of personal information?
- Do you have a designated individual that is ready to respond in writing to thousands of potential customer inquiries about the company’s privacy practices and your compliance with the CCPA?

PARTNERING TO ACHIEVE COMPLIANCE

We are ready to partner with you to explore your options and obligations under the CCPA. Our team will work together to:

- Complete data mapping
- Update policies and procedures
- Draft written disclosure notices
- Review contracts with third parties with whom you share personal information

Most importantly, we will help you prepare for the deluge of customer requests that are sure to arrive on January 1, 2020, as lawyers gear up for the easy targets that have failed to take steps to achieve compliance with the CCPA. There are already a significant number of bills seeking to amend the CCPA pending, and we expect more to emerge. We can ensure your continued compliance.

We can help you avoid being a target.

TO LEARN HOW OUR TEAMS CAN WORK TOGETHER, CONTACT:

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