

# The Clock Is Ticking on Complying with the California Consumer Privacy Act



  **Take Aim Now.**

Forty million California residents and thousands of businesses that hold personal data about them will be impacted by the California Consumer Privacy Act (AB 375) aka **CCPA** — when it comes into effect on January 1, 2020.

While the definitions, scope and requirements of the CCPA are likely to evolve, data privacy is here to stay and the impact will inevitably be broader across the country. The most successful businesses must not only be prepared to meet the CCPA's compliance requirements, but also quickly respond to new data privacy mandates, and most importantly — earn and maintain consumer trust in a data-driven world.

## OVERVIEW OF CCPA

CCPA is California's answer to the European Union's General Data Protection Regulation (GDPR), which ushered in the most important change in data privacy regulation in 20 years. CCPA grants California residents sweeping rights around the collection, storage, sharing and use of their personal data. After January 1, 2020, CCPA-impacted businesses will also be required to provide consumers access to a year's worth of their data upon verifiable request.

ISSUE	CCPA
<b>Consumer's Right to Know</b>	The Consumer has the right to ask the Business to disclose to the Consumer the Categories of Personal Information (PI) that it has collected about them, the Categories of Sources it has collected the PI from, and the Categories of Third Parties that the Business has sold the PI to in the past 12 months.
<b>Consumer's Right to Access</b>	The Consumer has the right to ask the Business to provide a list of the actual PI values it has collected about the Consumer in the past 12 months.
<b>Consumer's Right to Delete</b>	The Consumer has the right to ask the Business to delete their PI.
<b>Consumer's Right to Opt Out</b>	The Consumer has the right to ask the Business to stop selling, or disclosing for other business benefit, the Consumer's PI.
<b>Consumer's Right to Equal Service</b>	The business cannot discriminate against the Consumer for exercising any of their rights.
<b>Notice to Consumer</b>	The Business must provide clear notice to the Consumer about the Categories of PI it collects, and about the Right to Opt Out.
<b>Verifiable Consumer Request</b>	When the Consumer exercises their rights, they must send a Verifiable Consumer Request to the Business, which the Business can use to authenticate the Consumer, and the Business must respond in 45 days.

## TAKE ACTION ON CCPA.



# Solving for the California Consumer Privacy Act (CCPA) with Metadata

## FSFP'S CCPA PLAYBOOK HELPS YOU DEVELOP A PLAN IN 10 DAYS BY:

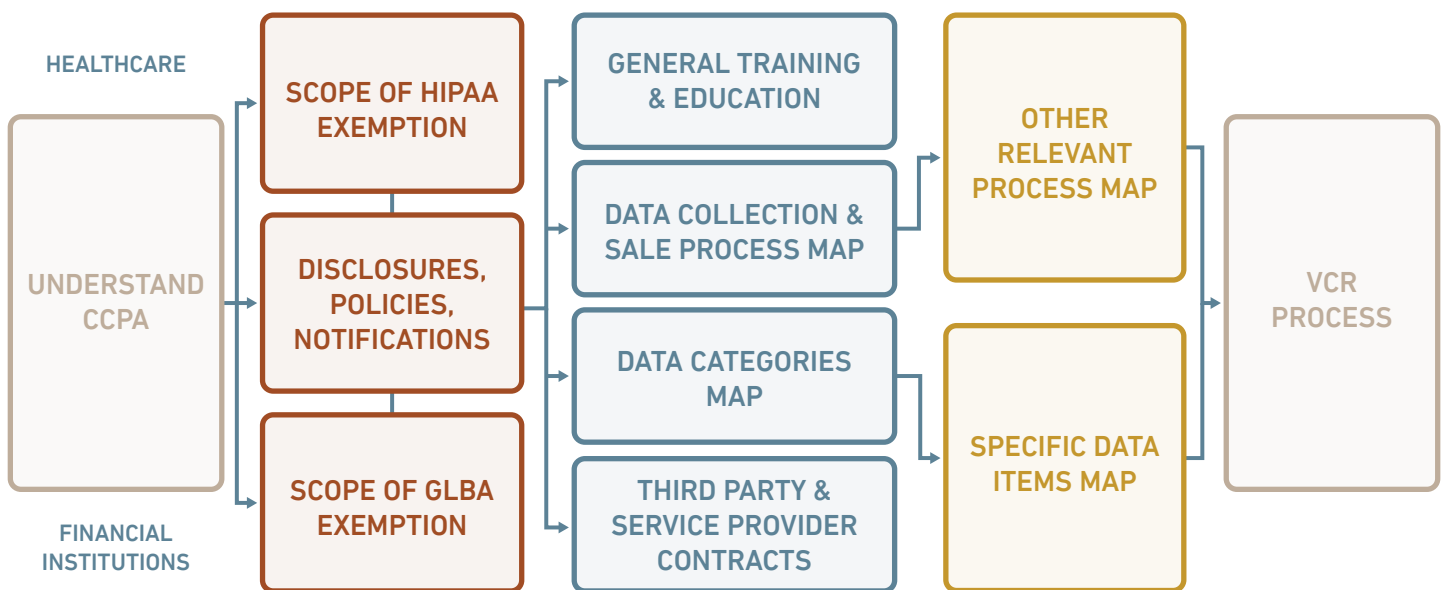
- Determining where you are in terms of your organization's response to CCPA based on a breakdown of its 150 constituent elements (essentially a Gap Analysis)
- Identifying the tasks that have to be carried out to become CCPA-compliant
- Resolving how your organization has to configure and operate your metadata solution to support CCPA compliance
- Deriving a detailed project plan for how CCPA compliance will be reached after completion of the CCPA Playbook
- Loading pre-specified CCPA-relevant content from the Playbook into metadata to update business glossary definitions and reference data code sets

The governance of data, processes, people and technology are at the heart of meeting the CCPA challenge. To prepare for CCPA, your organization needs to know what CCPA-sensitive data you have, where it resides and why you have it.

First San Francisco Partners (FSFP) developed the **CCPA Playbook** as a technology-based metadata solution that can quickly put you on the road to compliance, while laying the foundation for a privacy-by-design governance program for the future.

## HIGH LEVEL APPROACH TO PRIORITIZING THE SOLUTION FOR CCPA

- The entire scope of CCPA may not have to be solved in a single effort.
- There is a logical sequence of tasks, shown at a high level below, and Client Legal Counsel can decide which of these tasks can be eliminated or delayed.
- We recommend a more detailed assessment based on the CCPA Playbook.



## TAKE ACTION ON CCPA.