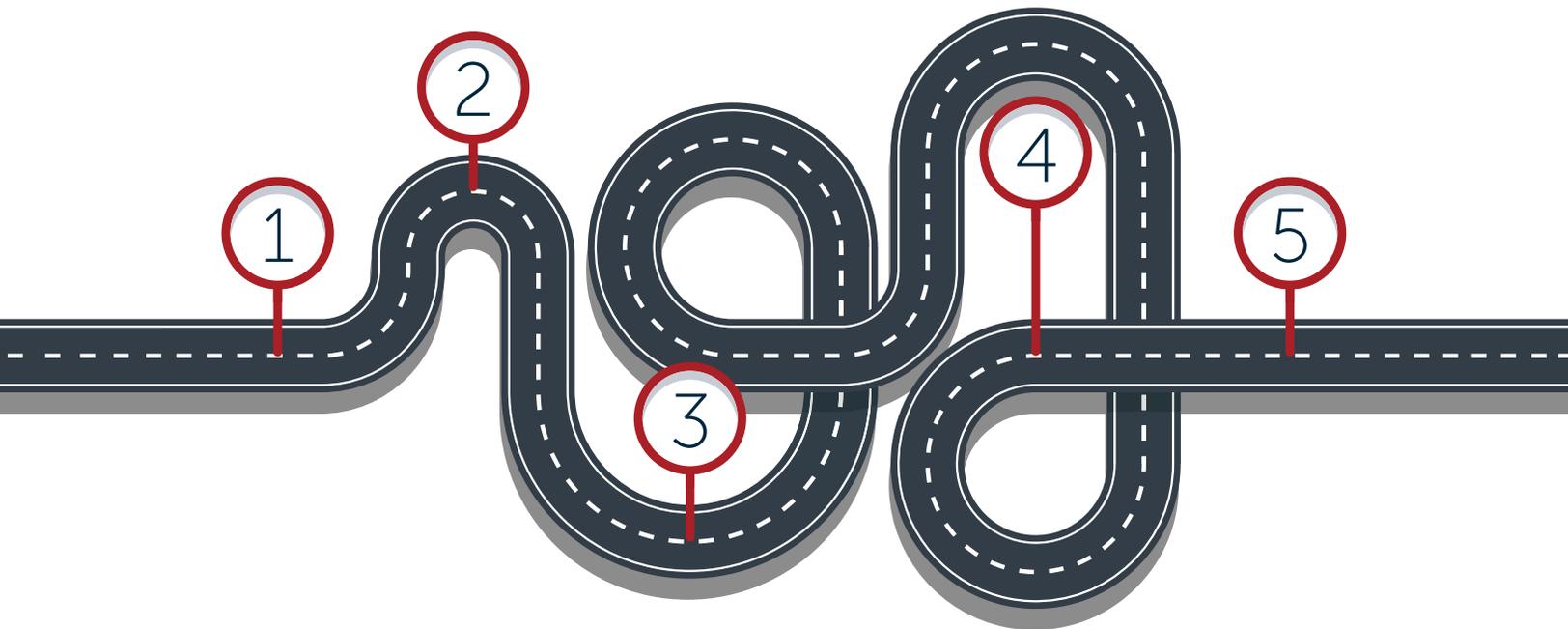


The California Consumer Privacy Act:

DWT'S ROAD MAP TO COMPLIANCE



1

ASSESS CURRENT STATE

- Assess ability to identify, extract, and erase “personal information” relating to a particular consumer
- Analyze effects of consumer opt-in/opt-out and deletion rights on operations, including disclosures, processes, and storage exempted from these rights
- Update information security risk assessment and review adequacy of security controls in light of new liability provisions

2

CONFIRM INFORMATION AND SYSTEMS MAPPING

- Create inventory of information collection points, systems, and storage locations
- Review and revise service provider/ third-party agreements that require sharing consumer personal information
- Map relationship between consumer information points and consumer response protocols to facilitate disclosure, opt-out, and opt-in as required

3

UPDATE INFORMATION GOVERNANCE & SECURITY PROGRAMS

- Update existing or develop tailored program that considers information security and consumer privacy obligations throughout business operations
- Create model information handling schedules for service provider and other third-party relationships
- Update incident response protocol and security controls

4

IMPLEMENT CONSUMER RESPONSE PROTOCOLS

- Implement processes to respond to requests from consumers for access and deletion within 45 days
- Implement consumer opt-out and opt-in procedures that comply with new standards

5

UPDATE POLICIES, PROCEDURES, AND TRAINING

- Update online and offline consumer privacy policies, including adding required disclosures to websites
- Train personnel on new requirements, consumer rights, and how to respond to requests for access or deletion

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California Consumer Privacy Act (CCPA)

FREQUENTLY ASKED QUESTIONS

Are We There Yet?

Why Are There So Many Stops on the Road Map?

The CCPA will require businesses to rework privacy and information security policies and procedures across business lines and throughout the information lifecycle. In order to meet the detailed notice and access requirements set forth in the law, organizations will need to create and maintain an unprecedented amount of documentation on the way in which they collect, store, and share information. As the landscape of privacy regulation continues to change rapidly, a holistic compliance approach will make your consumer information infrastructure agile and sustainable even as new requirements arise.

Who Should Drive?

Why Should I Hire Davis Wright Tremaine's Privacy and Security Team to Assist My Organization with Compliance?

Aligning business processes to a complex regulatory landscape requires an advisor who can combine deep knowledge of the relevant statutes with technical and implementation expertise.

DWT has been engaged in the CCPA drafting process, as well as the ongoing advocacy efforts to amend the new law. Our in-depth and current knowledge of the CCPA, combined with experience advising clients on pragmatic strategies to comply with the full panoply of privacy laws, such as GDPR, HIPAA, GLBA, FCRA, NY DFS regulations, and breach notification requirements, helps us steer clients in the right direction.

Can We Make a Pit Stop?

Why Do I Need to Act Now if the Compliance Deadline is January 2020?

The CCPA represents a significant course change in privacy regulation. Requirements to correlate consumer information across collection points and business lines, to be able to restrict use and implement opt-outs and opt-ins, and to respond to consumer requests on tight timelines will take time to implement for businesses of every size. Strategic integration of these new practices into existing consumer information flows will provide long-term benefits for proactive businesses that want to lean into the emerging consumer regulatory landscape. But strategic compliance initiatives must start now to be fully ready for compliance in 2020.

Contact us to obtain a business proposal or to engage a member of the DWT Privacy and Security Team for a specific project or service.



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