

# HALOCK<sup>®</sup> Checklist CCPA

## 1 Download the CCPA

## 2 Applicability – Determine if the CCPA is applicable to your organization (If any below apply, the yes)

- ☐ Gross sales exceed \$25 million
- ☐ Buys or sells, for commercial purposes, the information of at least 50,000 consumers or households annually
- ☐ 50% or more of revenue derived from the sale of consumer data on an annual basis

## 3 Understand data processing activities – create data inventory

- ☐ Enumerate Data Categories - All data that could identify an individual
- ☐ Third-Parties - Understand who is involved and how they handle your data
- ☐ Data Storage - Determine where and how consumer data is stored
- ☐ Purpose - Define why the organization collects and stores consumer data

## 4 Consumer Rights – define procedures

- ☐ Notice - Disclose all categories of data collected w/ purpose for collecting them. Include process to keep disclosures up to date.
- ☐ Erasure - Determine what data can be deleted or anonymized to not identify the consumer.
- ☐ Opt-out - Determine methods for providing consumers the option to opt-out.
- ☐ If the consumer is a minor, they must opt-in.
- ☐ Access - Leverage data inventory to provide consumers lists of all data collected by the organization and/or sold to third parties.
- ☐ Data portability - Create at least 2 methods
- ☐ Define process for verifying consumer identity prior to completing requests.
- ☐ Ensure procedures take into account preservation of data for litigation and/or compliance.

## 5 Privacy Policy – Create compliant policy and publish

- ☐ Disclosures
  - i. Categories of data collected
  - ii. The purpose for collecting that data
  - iii. Any processing activities that have occurred in the past 12 months
  - iv. All categories sold or disclosed for business purpose
- ☐ Consumer Rights - Ensure all consumer rights are described in the privacy policy.
- ☐ Opt-out - Include "DO NOT SELL MY PERSONAL INFORMATION" hyperlink or instructions for consumers to opt-out.

## 6 Update Website

- ☐ Include updated privacy policy.
- ☐ Include "DO NOT SELL MY PERSONAL INFORMATION" link.
- ☐ Determine if there will be a site specific to CA residents or one site for everyone.

## 7 Review contracts with 3rd parties

- ☐ Ensure limitations are placed on data shared
  - i. Comply with erasure requests
  - ii. Not reselling consumer data
  - iii. Not disclosing consumer data beyond business purpose

## 8 Reasonable security controls

- ☐ Assess Risk - Conduct a Duty of Care Risk Assessment (DoCRA)
- ☐ Close Gaps - Apply reasonable and appropriate controls to safeguard data and detect inappropriate access to data.
- ☐ Incident Response - Implement plan capable of containing and mitigating impacts of a data breach.

## 9 Train employees

- ☐ Consumer Rights - Ensure employees are aware of roles & procedures when responding to a consumer request.
- ☐ Security - Those with roles in data security must be aware of organizational policies and procedures
- ☐ Incident Response - Personnel with response duties must be aware of the plan and new procedures.

## 10 Contact Halock to support your compliance requirements.

