## HALOCK<sup>®</sup> Checklist CCPA

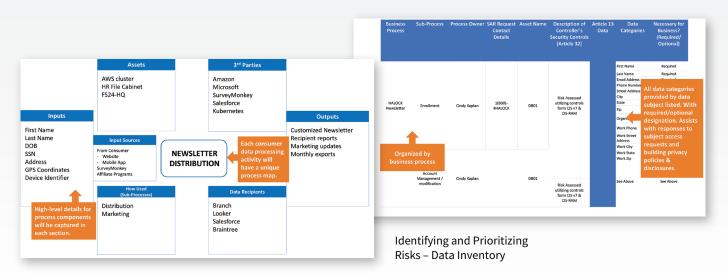
T	L DOWNLOAD THE CCPA		
2	App	licability - Determine if the CCPA is applicable to your organization (If any below apply, the yes)	
		Gross sales exceed \$25 million	
		Buys or sells, for commercial purposes, the information of at least 50,000 consumers or households annually	
		50% or more of revenue derived from the sale of consumer data on an annual basis	
3	Und	erstand 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	Upd	ate Website	
		Include updated privacy policy.	
		Include "DO NOT SELL MY PERSONAL INFORMATION" link.	
	П	Determine if there will be a site specific to CA residents or one site for everyone.	
7		iew 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	
0	Dan		
8		sonable security controls  Assess Risk - Conduct a Duty of Care Risk Assessment (DoCRA)	
		Incident Response - Implement plan capable of containing and mitigating impacts of a data breach.	
Ω			
9		in 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.	
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 $10 \ \ \text{Contact Halock to support your compliance requirements.}$ 

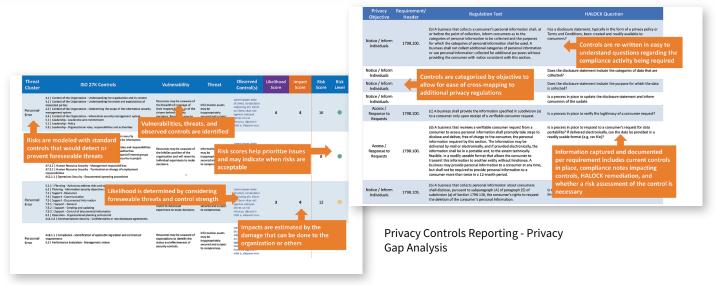
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## **Partner with Experience**

Knowing the type of data that is collected, where it is being held, with whom it is being shared, and how it is being transferred is a central component of most data privacy and data security programs. The process of answering these questions is often referred to as a "data inventory." To develop an organization-wide privacy program, first, inventory the data that you need to protect, then identify the applicable privacy regulations that need to be addressed. HALOCK can help you through this comprehensive process.



**Process Mapping Diagram** 



The Risk Register Partial Risk Register (Abbreviated view of identified risks)