



California Consumer Privacy Act (CCPA) Compliance Checklist

A. Determine Whether CCPA Applies to Your Business

- Are you a for-profit entity doing business in California that (1) has gross revenue exceeding \$25 million or (2) buys or sells a large amount of consumers' personal information?
- Does the information you collect fall under one of CCPA's exceptions – e.g., for certain medical or financial information?

B. Review Existing Practices and Policies

- Identify the types of personal information you collect about consumers, the point at which that collection occurs, and the ways in which that information is used.
- Ensure that you have internal and outward-facing data privacy policies, and assess whether those policies comply with the CCPA.

C. Revise Practices and Policies

- Issue privacy notifications at or before the point of information collection, disclosing the categories of information that you collect and how you use that information.
- Create a process to respond to data requests associated with the CCPA's individual rights, including consumers' right of access, right to be forgotten, right to opt-out, and right to service on equal terms.
- Review and test your security practices to ensure that they are up-to-date with technological developments and are appropriate in light of the nature of the personal information that you collect.
- Provide employee training on data security policies, procedures, and/or protocols.
- Ensure that existing agreements with third parties prohibit entities that receive personal information from you from using that information for any purpose other than to perform contracted services.

D. Monitor Developments

- Assign responsibility for monitoring CCPA amendments and regulations.
- Maintain contact with counsel to assess how amendments and regulations may impact your compliance strategy.