

The digital marketer's guide to navigating CCPA.

These slides provide digital marketers with a checklist for ensuring CCPA compliance in your most common digital marketing tactics.

CCPA 101 recap.

What is CCPA (California Consumer Privacy Act)?

- Governs collection, use, disclosure of personal info of California residents
- Defines personal information very broadly
- Requires notice, understanding of data subject rights, ability to opt-out of sale and re-sale of data

How does CCPA compare to GDPR?

- Similarities – notice, data subject rights, opt-out of sale, “business” and “service provider” categories
- Differences – CCPA doesn’t have accountability or paperwork requirements, no opt-in consent except for changes in privacy practices

Who is impacted by CCPA?

- Does apply to companies “doing business” in CA + meeting 1 of 3 thresholds
- Does NOT generally apply to “service providers”

What is the timeline?

- Effective Jan 1, 2020
- Enforced Summer, 2020



How CCPA defines...

“Personal information”

means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

“Sale”... means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to another business or a third party for monetary or other valuable consideration.

 Account data is not considered “personal information.”

Your digital marketing CCPA checklist.










CCPA Compliance Checklist - Email Nurtures

ACTION NEEDED:	1st PARTY	2nd PARTY	3rd PARTY
Implement opt-out mechanism	✓	✓	✓
Update B2B privacy notice	✓	✓	✓
Get contractual assurances from data source			✓
Create opt-in opportunity for 2 nd and 3 rd party contacts		✓	✓
Honor opt-outs	✓	✓	✓

CCPA Compliance Checklist - Digital Advertising








ACTION NEEDED:	CONTENT SYNDICATION	PROGRAMMATIC	SOCIAL	3 RD PARTY PUBLISHER PROGRAM	3 rd PARTY INTENT DATA
Verify terms with service providers	✓	✓	✓	✓	✓
Update B2B privacy notice	✓	✓	✓	✓	✓
Provide opt-out mechanism	✓	✓			✓
Honor opt-outs	✓	✓			✓

CCPA Compliance Checklist - Events

ACTION NEEDED:	LEAD CAPTURE	SPONSOR ATTENDEE LISTS
Provide opt-in mechanism		
Update B2B privacy notice		
Get contractual assurances from organizer that you can reach out to attendees		
Honor opt-outs		






CCPA Compliance Checklist - Webinar

ACTION NEEDED:	REGISTRANTS POST-EVENT FOLLOW-UP AND NURTURE	SHARING LIST WITH CO-SPONSORED PARTNER
Provide opt-out mechanism		
Update B2B privacy notice		
Ensure opt-in language names each partner. Avoid sale/resale of data.		
Honor opt-outs		

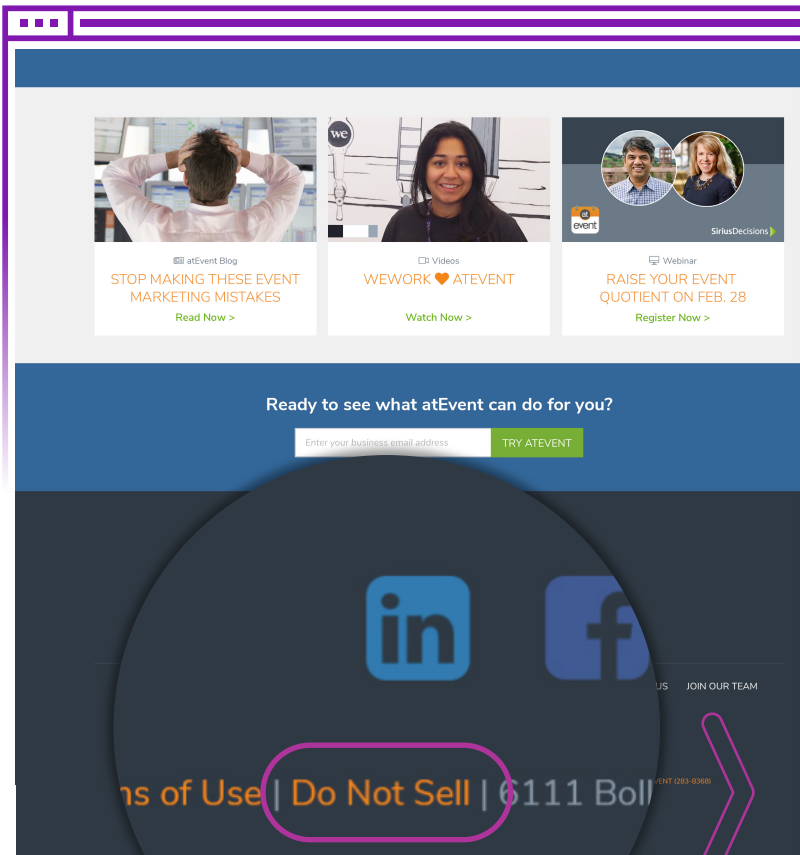


CCPA Compliance Checklist - Web

ACTION NEEDED:	WEBSITE	LEAD GEN FORMS
Insert "Tracking Subscription Manager" or "Do Not Sell My Info" link		
Update privacy notice with B2B language		



Sample “Do Not Sell” language.



Do Not Sell

PRIVACY
POLICY

TERMS
OF USE

EU DATA PROTECTION
ADDENDUM

ATEVENT DATA
SUBPROCESSORS

DO NOT
SELL

Sample Opt-Out Language:

California Opt-Out Notice

Like many companies online, we use services provided by Google, Facebook and others that help deliver interest-based ads to you. California law may classify our use of these services as a “sale” of Personal Information from which California residents have the right to opt-out. This is because the companies that provide these services collect information from our users (e.g., device data and online activity data) to help them serve ads that they think users may want to see based on their online activity. These ads are known as interest-based advertisements. Your choices for opting-out of these companies’ use of your Personal Information for interest-based advertising include:

Blocking cookies in your browser.

Most browsers let you remove or reject cookies, including cookies used for interest-based advertising. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. For more information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit www.allaboutcookies.org.

Blocking advertising ID use in your mobile settings.

Your mobile device settings may provide functionality to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

Using privacy plug-ins or browsers.

You can block our site from setting cookies used for interest-based ads by using a browser with privacy features, like [Brave](#), or installing browser plugins like [Privacy Badger](#), [Ghostery](#) or [uBlock Origin](#), and configuring them to block third party cookies/trackers. www.allaboutcookies.org.

Platform opt-outs.

The following advertising partners offer opt-out features that let you opt-out of use of your information for interest-based advertising:

Google: <https://adssettings.google.com>

Facebook: <https://www.facebook.com/about/ads>

Advertising industry opt-out tools.

You can also use these opt-out options to limit use of your information for interest-based advertising by participating companies:

Digital advertising Alliance: <http://optout.aboutads.info>

Network Advertising Initiative: <http://optout.networkadvertising.org/?c=1>

For more information about how we handle personal information, see our [Privacy Policy](#)

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We are not lawyers and nothing in this presentation should be considered legal advice. Please consult an attorney to address the individual needs of your business.

At Iron Horse, we believe that a strong consumer privacy program is the foundation for deeper relationships with your customers.

With 19 years' experience building and scaling global integrated marketing programs for Enterprise, we have the expertise in Brand Safety and Privacy Compliance to help you create compliant digital marketing programs that foster deep engagement and drive conversion.

For more information on CCPA, watch our webinar:

A Digital Marketer's Guide to Navigating CCPA.

[WATCH WEBINAR](#)

