CCPA Readiness Checklist

BigID

The California Consumer Privacy Act (CCPA) is designed to protect California consumers and to motivate (and enforce) all organizations that deal with California resident information to take their responsibility to safeguard consumer data seriously.

The CCPA puts data rights back into the hands of consumers – from understanding how their data is being used, to having a say in sharing their data with third parties, to promoting an expectation of protection and privacy of personal and customer data.

Checklist to CCPA Compliance

- [ ] **Map & inventory consumer data:**
  - [ ] Discover, identify, categorize and index all CA resident and household data
  - [ ] Correlate individual information to an identity
  - [ ] Assign residency to CA consumers and households
  - [ ] Maintain up to date and current documentation of CA consumer data flow maps
  - [ ] Record and monitor third-party data sharing flows

- [ ] **Automatically fulfill consumer data rights:**
  - [ ] Create an intake process for data access rights requests and define workflows
  - [ ] Classify and categorize all data to be included in reports
  - [ ] Fulfill DSARs (fun fact: fulfillment is now 1 month from the day of request)
  - [ ] Automate reporting in response to requests
  - [ ] Validate data rights (including right to deletion)

- [ ] **Update privacy policy & disclosure notifications**

- [ ] **Define breach thresholds & privacy team workflows for breach response:**
  - [ ] Determine whose data and attributes are impacted by the breach
  - [ ] Identify apps that have accessed the breached data source
  - [ ] Populate workflows with breach data analysis to facilitate response & notification

- [ ] **Validate and test:**
  - [ ] Access requests: response, accuracy, & comprehensiveness
  - [ ] Data flow maps for assigned business process & associated attributes
  - [ ] Data deletion for current state & ongoing data collection
  - [ ] Data sharing with third parties, including business purpose & data categories
  - [ ] Consent and opt-out operationalization
  - [ ] Security policies for data protection

What data falls under the CCPA?

The CCPA declares that all personal information is covered under the regulation. The CCPA now defines personal information to include any data that may be reasonably associated, linked or related to a CA resident and household.

Personal data includes both direct identifiers like Social Security numbers, phone numbers, and license plate patterns – as well as inferred identifiers, which may include anything from name to geolocation history to shopping history.

CA Consumer Rights

▶ **Right to know**: CA consumers have the right to know what personal data is being collected, analyzed, and monitored.

▶ **Right to opt-out**: Consumers have the right to opt-out of having their data sold or shared to third parties.

▶ **Right to delete**: Consumers have the right to request that their data be deleted (or reasonably quarantined).

▶ **Right to equal service**: Consumers have the right to equal service regardless of whether or not they choose to share their data with third parties (or request that it be deleted).

Penalties for Non-Compliance

▶ The California Attorney General can levy **penalties based on privacy violations and data breach notification requirements**: up to $7,500 penalty for violation, and up to $750 in civil damages per user.

▶ The CCPA grants **explicit rights for individuals to file claims** for privacy loss and/or compromised identities.

▶ The regulation introduces a **private right to action** if an organization does not have adequate security policies and practices in place to prevent a data breach.

How BigID Helps with the **CCPA**

BigID helps organizations manage and protect their data on-prem and in the cloud, enables organizations to meet data privacy and protection regulations, and provides unmatched coverage for all types of data across all data stores with advanced data intelligence.

Organizations can leverage BigiD as a complete end-to-end data rights platform, from a self service portal to automated fulfillment and reporting - all on a foundation of discovery-in-depth covering all data, everywhere.

▶ Discover and classify all CCPA impacted data across enterprise data sources

▶ Map, inventory, and index CCPA data by individual

▶ Operationalize data flow mapping and monitoring through data intelligence

▶ Integrate with workflows for end to end orchestration

▶ Fulfill data subject access requests

▶ Automate data rights validation and assurance

▶ Manage and monitor 3rd party data sharing