

## California Privacy Rights Act: Action Item Checklist

California Privacy Rights Act (CPRA) gives new data privacy rights to California residents with respect to their personal information that is collected and maintained by companies doing business in California. Even if your business is compliant with current privacy laws, you must consider how the CPRA may affect your business. Below is a checklist of action items for businesses preparing for CPRA.

- Assess if your business meets new CPRA thresholds.
  - \$25M in annual global revenue
  - Buy, sell, share the personal information of 100,000 consumers (California residents) annually
  - Derive 50% or more of profits from selling or sharing of personal information
- Create a personal information inventory and data flow maps to determine how, where, and what personal information is collected and maintained in your business. Adjust practices based on data minimization principles and document retention limitations.
- Conduct a gap analysis to understand where your current practices may fall short.
- Determine if your business collects sensitive personal information.
- Determine if you sell or share data as defined by the CPRA.
- Prepare required consumer notices.
- Update privacy policy.
- Amend service provider agreements and update templates.
- Analyze collection, storage, use and disclosure of employee data.
- Bolster infrastructure for handling and responding to consumer requests and documenting such efforts.
- Prepare process for verifying consumers.
- Provide training for employees responding to consumer requests.
- Create a data breach response plan.
- Update your data retention policy.
- Analyze and implement reasonable security measures and consider applicable cybersecurity insurance.
- Monitor and audit compliance and update policies and practices as necessary or required by law.

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