



CCPA to CPRA Compliance Checklist



STEP 1 Will the CPRA Apply to My Business?

- Covered Business Changes**

Annually buys, sells, or shares Personal Information (“PI”) of 100K+ CA residents (CCPA threshold was 50k); \$25 million annual gross revenue threshold relates to the previous calendar year.
- Exempt Personal Information Expanded**

Definition of “Publicly Available Information” (which is exempt) now includes information in widely distributed media or publicly disclosed by a consumer.

STEP 2 Internal Updates

- Right to Correct**

Individuals now have the right to correct inaccurate data. You will need to update your process for handling customer rights requests to accommodate this.
- New Disclosures Requirements**

Determine the length of time each category of PI is retained. Determine whether PI is sold or shared.
- Dark Patterns Prohibited**

User experiences must not subvert or impair user autonomy, decision-making, or choice.
- Risk Assessments**

Perform regular risk assessments as required by regulation, including when processing sensitive PI.

STEP 2 Internal Updates (continued)

- Lapsing PI Exemptions** B2B transactions and employee PI exemptions will lapse on January 1, 2023.
- Expansion of Right to Opt Out** Expands to the sharing of PI in addition to the selling of PI; option to use one clearly labeled link instead of two.
- Sensitive Personal Information** New category of PI. Requires separate disclosures and creates new consumer rights. You will need to update your process for handling customer rights requests to accommodate this.
- Update Data Mapping** A comprehensive data map must be completed to address the other issues explained in Step 2.

STEP 3 Update Your Documents

It is crucial to complete both Steps 1 and 2 before completing Step 3. If you update your notice before ensuring that your internal operations match what you're claiming, it could increase your liability.

- Privacy Notice**
- Data Protection Agreements (DPAS)**
- Internal Policies**
- "Do Not Sell My PI" Link Language**

Disclaimer: This graphic is informational only and is not intended as legal advice. It may not be suited for every organization. The requirements of the CPRA may be clarified by regulations from the California Attorney General and the CPPA in the future. To receive specific advice on how to comply with the CPRA, please consult an attorney.