

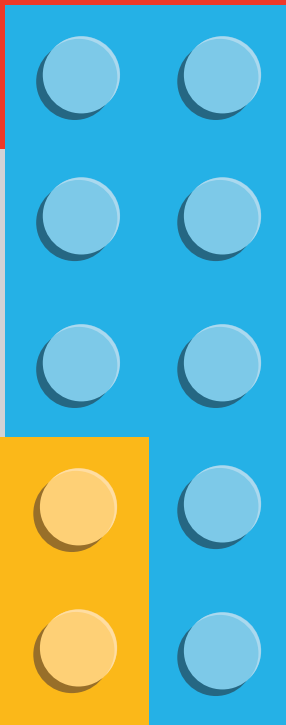
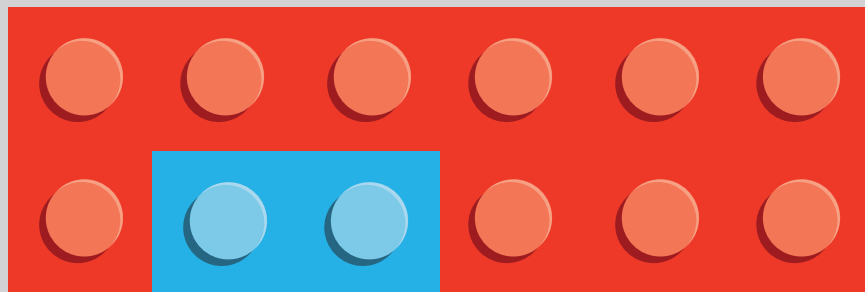
PRIVACY AND DATA SECURITY

The Building Blocks of CCPA Compliance

The California Consumer Privacy Act (CCPA or Act) is upon us and no matter how far along your organization is in its readiness efforts, action and persistence are required to stay on top of this comprehensive and dynamic new law. Use the building blocks below to discover where your readiness efforts should focus.

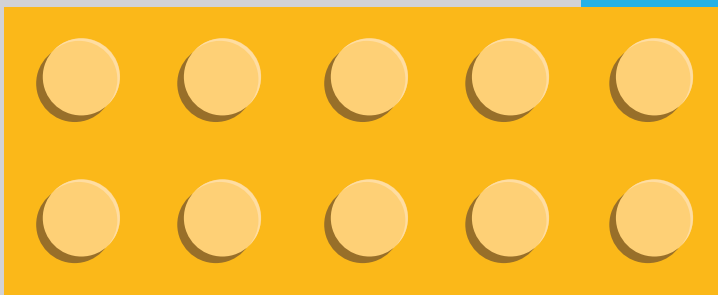
Check Applicability

Before you begin overhauling your privacy and security practices, make sure you know whether the CCPA applies to your organization. Because the applicability thresholds are tethered to annual performance, they may change over time. Review Manatt's infographic covering applicability and the central elements of the Act [here](#).



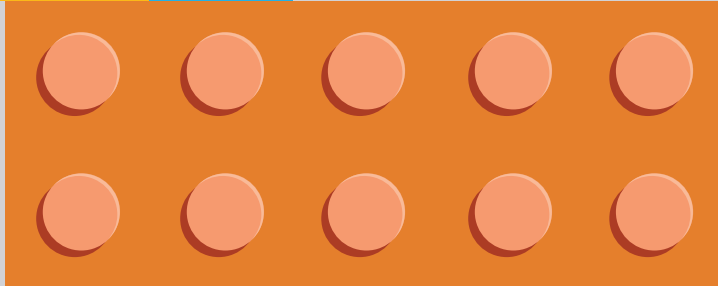
Know Your Data

The first step with CCPA compliance is understanding what data you hold and what you do with it. Complete a data mapping exercise to visually understand what personal information is collected, how it's processed, how it's stored, whom it's accessed by, and whom it's shared with or made accessible to.



Respond to Consumer Requests

The CCPA grants consumers a number of rights over their personal information. Set up consumer-facing and backend systems to allow, verify and process consumer requests to access and delete information and to opt out of "sales" as appropriate.



Update Your Privacy Policy

Once you've got the first few blocks completed, only now are you ready to update your privacy policy and terms of service. Make sure your disclosures accurately describe your processes and how they comply with the CCPA. Use plain language and alert consumers of these updates.

Check In With Vendors

Make sure your vendors and other business partners are working toward CCPA compliance as well. Update vendor contracts to delineate roles and responsibilities and limit your organization's liability in the case of potential CCPA violations.

Train Your Employees

Consumer-facing staff should be ready to inform consumers about how the organization is complying with the CCPA and direct them in processing requests. Your IT, legal, operations and marketing teams should be aware of new changes to the law and internal operations and work together to ensure holistic compliance across the organization.

Contact

Donna Wilson

CEO, Managing Partner and Co-Leader
Privacy and Data Security
310.312.4144
dlwilson@manatt.com

Scott Lashway

Partner and Co-Leader
Privacy and Data Security
617.646.1401
slashway@manatt.com

Stay Up to Date

Manatt's privacy and data security practice offers a hub of resources to assist you in understanding the CCPA. Stay in the loop with the latest articles, webinars and tools at www.manatt.com/CCPA.

About Manatt

This overview is provided for general guidance. Further discussion with legal advisors is required for a detailed and specific CCPA readiness assessment. Manatt, Phelps & Phillips, LLP is a multidisciplinary, integrated national professional services firm known for quality and an extraordinary commitment to clients, with offices located in California, New York, Illinois, Massachusetts and Washington, D.C. For more information, visit www.manatt.com.