TOP QUESTIONS ASKED AND LATEST UPDATES FOR THE CCPA

Dan Clarke
President, IntraEdge
IntraEdge is a large technology services, product, and training company.

- Founded in 2002 in Phoenix, AZ
- International scope and reach
- Decades of experience in technology innovation in finance, retail, education and transportation.

Intel® and IntraEdge came together to address established and emerging data privacy rights laws. The result is Truyo.
Dan Clarke is the President at IntraEdge. He has 30 years of experience combining technology with media, retail and business leadership, has held executive leadership roles at Intel, and is a 9-time CEO. His focus has been on clearly implementing a growth and exit plan through capital and talent acquisition.

Notable professional and personal accomplishments include raising $300 million from top-tier venture and private equity firms and in the public markets, building an extensive network of business relationships, and competing as an Ironman triathlete.
AGENDA

1. State of privacy
2. “Do Not Sell My Personal Information” link
3. Request volume/Agent requests
4. Categories of Information
5. Data retention practices
6. Client configuration and internal procedures
7. Record keeping
8. Verification/SSO
Data protection is heating up
Hawaii, Washington, Nebraska, Massachusetts, Minnesota, New Hampshire, New York, New Jersey, Virginia, Texas, and Arizona all have active bills in committee. We predict Washington will pass March 12th and other states will follow suit for implementation mid-2021.
"Disclose the information compiled within their privacy policy or posted on their website and accessible from a link included in their privacy policy."

“The most significant change to the requirements under Section 999.317(g) is the modification that applies to businesses that **buy, sell or use for commercial purposes the personal information of 10 million or more consumers** within a single calendar year.”

*Source: “CCPA proposed modified regs 2.0 issued in Calif.”, IAPP, Jim Halpert, Tracy Shapiro, Lael Bellamy, CIPP/US, Elaine Critides
Washington Privacy Act

- The regulations outlined in the bill would apply to any business that controls or processes personal data of 100,000 consumers or more.
- Applies to companies located in Washington and companies that target services to Washington customers.
- Businesses that derive more than 50 percent of their revenue from the sale of personal data and process or control personal data more than 25,000 consumers are also subject to the regulations.
- The law does not apply to state and local governments; municipal corporations; or information such as protected health data.
  - You must do a data assessment
  - The way delete requests are handled are potentially different and there is a right to correction
I am not a lawyer

But I will tell you how others have implemented or interpreted privacy regulations
Do I need a “Do Not Sell My Personal Information” Link?

- Businesses must provide a “reasonably accessible” and “clear and conspicuous link” titled “Do Not Sell My Personal Information”*
- Enables customers to opt-out of the sale of their personal information but not require them to create an account to do so.*
- Description of consumer’s rights*
- Absent DNS link is deemed a valid opt-out during such time period

*Source: “Top 5 Operational Impacts of the California Consumer Privacy Act”, The IAPP Westin Research Center

It may be lower risk for businesses to post the link
Are Companies Receiving Requests?

• All Truyo clients have received requests. The majority have received dozens, while 20% have received more than 1,800
  • None of these are attributed to spikes in requests
  • Faster adoption of privacy rights as compared to GDPR requests
Are there groups mass-submitting requests?

- Consumer groups are gathering to mass-submit requests
- Reduce effort by only processing valid CCPA requests
- Could provide a bad consumer image
- SayMine.com

*This is potentially an explosive element that we don't understand completely*
Recommended Categorization

- Contact Information
- Purchase History
- Geo-location
- Inference Data (Market Segmentation)
- Internet Data (Click-streams, IP address)
- Sensitive Data (CC, SSN)
- Media (Pictures, Audio, etc)
- Biometrics
- HR Information

*This is required as its own type of request: fallback, employment, includes where you've disclosed to third parties*
How long should I retain data?

SAR Data Retention

Amount of time personal data is preserved before allowing the data subject to access. After the time has expired, data will be removed until another request is made.

- 30 days
- 60 days
- 90 days
- 6 months
- 1 year
- 2 years

Retain personal data in the portal for

SAR allowance

Number of SAR requests data subjects can make:

- 2 every 12 months

avoid creating a honeypot by maintaining all your security procedures
How are companies implementing privacy programs based on CCPA interpretations?

there’s a lot of gray area that requires flexibility
SPAM/Fraud Prevention
Use a verification code sent to email/phone to ensure legitimate access.

Internal Verification
Ask for information you have on file
• Account number
• Last purchase total

External Verification
Don’t forget to fallback from 1. Delete to Request Do Not Sell and Categories 2. Right to know to Categories

Best Practice:
• Leverage single sign on every place possible
• For non-account holders use a verification code sent to email/phone to ensure legitimate access
What are the **reporting requirements?**

- **Open Requests**
- **Requests by system**
- **Avg. Time to Complete**
- **Requests by type**

"...posted on their website and accessible from a link included in their privacy policy."
Product Features
Scalable Privacy Rights Automation for the Enterprise

Data Automation
Allow users to automatically search, extract, delete, change and present data to users

Secure Subject Access Request Portal
Offer customers a self-serve privacy experience

Consent Management
Let customers manage consent in the same portal

Identify Validation & Security
Automated identity validation with bank-level security

Reporting & Audit Trail
Automatically log everything with detailed reporting

On-Premises Hosting
Capability to host in your instance

The Truyo Difference

- Consumer portal with end-to-end automation
- Scalable architecture to future proof compliance
- Internationalization
- 15+ years experience connecting complex data systems
- Fully customizable UI & UX
- Enterprise-level dedicated customer success team
THANK YOU!

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