

CCPA Compliance Measures Checklist

Most frequently cited violations (of the sample)			
Item	Issue	Service Provider Specific	Number of Instances
Provide required notices (online and in-person, if applicable)	Notice to Consumers		9
Provide effective methods to submit consumer requests	Notice to Consumers		5
Clarify obligations as a service provider (if applicable)	Notice to Consumers	Y	1
Prohibit service providers by contract from retaining, using, disclosing PI received for other purposes (if applicable)	Non-Compliant Service Provider Contracts	Y	2
Include CCPA-specific addendums to service provider contracts	Non-Compliant Service Provider Contracts		1
Include notice of CCPA consumer rights in privacy policy	Non-Compliant Privacy Policy		9
Privacy policy (accurately) describes CCPA request methods	Non-Compliant Privacy Policy		7
Privacy policy discloses information about collection, use, sale	Non-Compliant Privacy Policy		4
Implement request methods (including phone and email/website)	Lack of Request Methods		3
Explicitly state whether business has sold PI in past 12 months	Non-Compliant Privacy Policy		13
Explicitly state (and list) whether business has transferred PI for business purposes in past 12 months	Non-Compliant Privacy Policy		6
Provide clear, conspicuous, and functioning “Do Not Sell My Personal Information” Link (if needed) on all applicable platforms/properties	No “Do Not Sell My Personal Information” Link		10
Provide adequate disclosures about PI sold	Non-Compliant Privacy Policy		1
Establish adequate consent mechanisms for selling PI	Consent		1

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Clarify obligations as a service provider vs. business (if applicable)	Non-Compliant Privacy Policy	Y	1
Establish timely DSAR response processes, including timely response and notification	Untimely Responses to CCPA Requests		1
Establish effective DSAR response processes, including proper notification to individuals	Untimely Responses to CCPA Requests		1
Do not charge fees for CCPA requests in violation of CCPA	Charging Fees for CCPA Requests		1
Provide a Notice of Financial Incentive (if applicable, e.g., if personal information is exchanged for participation in loyalty programs)	No Notice of Financial Incentive		1
Make sure privacy policy is easy to read and understandable to the average consumer	Non-Compliant Privacy Policy		1
Provide consumers with effective methods to opt out of sale of PI (e.g., not simply directing consumer to third party trade association tool or mobile device settings or requiring multiple opt-out requests)	Non-Compliant Opt-Out Process		8
Provide consumers adequate information regarding opt-outs in privacy policy	Non-Compliant Privacy Policy		3
Provide consumers adequate information in notice of right to opt-out (including webforms, if applicable)	Notice to Consumers		4
Clarify effect of adjusting mobile device settings (e.g., whether opt-out rights would be fully effectuated)	Non-Compliant Opt-Out Process		1
Provide instructions for authorized agents to submit requests in privacy policy (including verification procedures)	Non-Compliant Privacy Policy		3
Provide a toll-free number for consumers making CCPA requests	Lack of Toll-Free Number		1
Establish compliant authorized agent request procedures (e.g., no notarization requirement)	Authorized Agent		3
Provide opt-in process for minors (if needed)	Sales of Minors' Personal Information		2

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Implement adequate privacy protections for minors/younger users (e.g., age-gating, parental verification)	Sales of Minors' Personal Information		1
Remove or appropriately disclose use of third party trackers	Sales of Personal Information		1
Implement service provider contractual relationship (where applicable)	Sales of Personal Information	Y	1
Process requests to opt-out submitted by global privacy controls (GPCs)	Sales of Personal Information		1
Implement appropriate verification procedures for DSARs (e.g., no verification required for opt-out, no account creation required)	Verification		3
Privacy policy addresses sale of personal information of consumers under 16	Sales of Minors' Personal Information		1
Establish appropriate training policies for employees responsible for handling requests	Training		1
Report metrics appropriately (if applicable)	Reporting		1