

FOLLOWING PRIVACY'S YELLOW BRICK ROAD: FROM GDPR TO CCPA

In the ever-evolving privacy landscape, the E.U.'s General Data Protection Regulation and many other country laws were only the beginning. The new California Consumer Privacy Act (CCPA), which goes into effect on January 1, 2020, builds upon existing privacy law principles that prohibit unlawful, opaque, and limitless capture and processing of personal data. The following diagram outlines your CCPA compliance roadmap and timeline:



Pre May 25, 2018: Preparing for GDPR

Companies operating in or servicing the E.U. determined whether they were subject to GDPR, and then proceeded to identify relevant business processes and personal data, documented and updated policies, and evaluated their overall GDPR risk profile.



May 25, 2018: E.U.'s GDPR Goes into Effect

Companies required to comply with the GDPR started to respond to data subjects, improve processes, employ DPO's, and address outstanding compliance requirements.



Today:

Companies are determining whether they need to comply with the CCPA, and are comparing CCPA to the GDPR to determine whether they have done enough to comply with this new regulation.



Q1 2019: Relevance and Scope

CCPA renews attention on privacy questions, particularly for companies who had counted on exemption from GDPR requirements. CCPA reflects many requirements defined in the GDPR, but also broadens the scope of personal data and creates additional categories and restrictions around sharing data with third parties. Companies are now asking, what's in play?



Q2 2019: CCPA Risk Profiling

Companies are determining in scope data and business processes, developing new policies, developing data subject response processes, and are evaluating their vendor relationships (sharing and selling). Awareness is ramped up towards the end of Q2 because of the six-month look back before January 1, 2020.



Q3 2019: Additional Guidance

The Attorney General is expected to provide guidance on some aspects of the legislation. Depending on the timing and clarity of these insights, earlier assessments and remediation actions may need to be revisited. New practices around data minimization shift into high gear.



Q4 2019: Readiness

Companies review the updates they made, determine whether additional remediation is required, and take a good look at their vendor portfolio and how their data is managed, shared, sold, or otherwise used. Data Protection Officers are needed now more than ever.



January 1, 2020: California Consumer Privacy Act Goes Into Effect

DID YOU KNOW?

CCPA presents new challenges and requirements for companies who must comply, including:

- ▶ Identifying relevant, in scope data
- ▶ Determining how this data is being processed
- ▶ Knowing which service providers and third parties control or process protected data
- ▶ Mapping a path to compliance

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