

# CCPA Compliance Guide

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## Overview

The California Consumer Privacy Act (CCPA) grants California residents specific rights regarding their personal information. This guide outlines NovaTech's obligations and compliance procedures.

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## Applicability

### Does CCPA Apply to NovaTech?

Yes. CCPA applies to businesses that:

- Have annual gross revenues > \$25 million
- Buy, receive, sell, or share PI of 50,000+ California residents
- Derive 50%+ revenue from selling California residents' PI

NovaTech meets the first two criteria.

### Who is Protected?

California residents who are:

- Customers
- Prospective customers
- Employees (limited rights)
- B2B contacts (limited rights)

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## Consumer Rights

### Right to Know

Consumers can request:

- Categories of PI collected
- Specific pieces of PI collected
- Sources of PI
- Business purposes for collection
- Categories of third parties with whom PI is shared

**Response deadline:** 45 days (extendable by 45 days with notice)

## **Right to Delete**

Consumers can request deletion of their PI.

**Exceptions:** - Complete transactions - Security purposes - Comply with legal obligations - Internal uses aligned with consumer expectations

## **Right to Opt-Out**

Consumers can opt out of the “sale” of their PI.

**Note:** NovaTech does not sell personal information in the traditional sense. However, sharing data with certain third parties may constitute a “sale” under CCPA.

## **Right to Non-Discrimination**

Cannot discriminate against consumers for exercising CCPA rights: - Denying goods/services - Charging different prices - Providing different quality

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## **Personal Information Categories**

### **Collected by NovaTech**

Category	Examples	Collected
Identifiers	Name, email, IP address	Yes
Commercial info	Products purchased, usage	Yes
Internet activity	Browsing, search history	Limited
Geolocation	IP-based location	Yes
Professional info	Job title, employer	Yes
Inferences	Preferences, behaviors	Yes
Sensitive PI	Account credentials	Yes

### **Not Collected**

- Biometric data
  - Protected characteristics
  - Health information
  - Financial account numbers (stored by payment processor)
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## **Compliance Procedures**

### **Privacy Notice Requirements**

Our privacy notice must include: 1. Categories of PI collected 2. Purposes for collection 3. Categories of third parties 4. Consumer rights description 5. “Do Not Sell My Personal Information” link 6. Financial incentives disclosure (if any)

**Review:** Annual update required

### **Responding to Consumer Requests**

**Verification Process** For requests via authenticated account: - Verify logged-in status - Confirm account ownership

**For requests without account:** - Match provided info against records - Request additional verification for sensitive requests - Document verification attempts

### **Request Handling**

1. Acknowledge receipt within 10 days
2. Verify consumer identity
3. Process request within 45 days
4. Provide response in accessible format
5. Document in CCPA request log

### **Do Not Sell Implementation**

1. “Do Not Sell My Personal Information” link on website footer
  2. Link leads to opt-out mechanism
  3. Opt-out honored within 15 business days
  4. Maintain opt-out list
  5. Notify third parties of opt-out
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## **Data Inventory**

### **Sources of Personal Information**

Source	Categories Collected
Direct from consumer	Identifiers, commercial
Automated collection	Internet activity, device
Third parties	Business contact data
Public sources	Professional info

### Third-Party Sharing

Third Party Type	Categories Shared	Purpose
Service providers	As needed	Service delivery
Analytics providers	Usage data	Product improvement
Advertising partners	Identifiers	Marketing

**Service Provider Contracts:** Must include CCPA-required terms prohibiting retention, use, or disclosure beyond contracted services.

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### Employee Training

#### Required Training

All employees handling consumer data:

- Annual CCPA awareness training
- Specific training for request handlers
- Updates when regulations change

#### Training Topics

1. What constitutes personal information
  2. Consumer rights under CCPA
  3. How to recognize CCPA requests
  4. Escalation procedures
  5. Documentation requirements
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## **Vendor Management**

### **Service Provider Requirements**

Contracts must include:

- Prohibition on selling PI
- Restriction on use beyond services
- Obligation to assist with consumer requests
- Certification of CCPA understanding

### **Assessment Checklist**

- Written contract in place
  - CCPA addendum executed
  - Purpose limitation documented
  - Deletion capability confirmed
  - Security measures verified
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## **CPRA Updates (Effective January 2023)**

The California Privacy Rights Act (CPRA) amended CCPA:

### **New Rights**

- **Right to Correction:** Correct inaccurate PI
- **Right to Limit Use:** Limit use of sensitive PI
- **Right to Know About Automated Decision-Making**

### **New Obligations**

- Purpose limitation (use only for disclosed purposes)
- Data minimization (collect only what's necessary)
- Storage limitation (retain only as long as needed)
- Annual cybersecurity audits (high-risk businesses)

### **Sensitive Personal Information**

New category requiring additional protections:

- Government ID numbers
- Account credentials
- Precise geolocation
- Racial/ethnic origin
- Religious beliefs
- Health information
- Sexual orientation

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## **Request Handling Workflow**

**Consumer Request**

Acknowledge              Within 10 days  
Receipt

Verify                      Identity verification  
Identity

Verified    Not Verified

Process    Request more info  
Request    or deny

Fulfill                      Within 45 days  
Request

Document  
& Log

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## **Penalties**

### **Enforcement**

- California Attorney General
- California Privacy Protection Agency (CPPA)

- Private right of action (data breaches only)

## **Penalties**

Violation Type	Penalty
Unintentional	Up to \$2,500 per violation
Intentional	Up to \$7,500 per violation
Minor's data	Up to \$7,500 per violation

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## **Resources**

### **Internal**

- Privacy team: privacy@novatech.com
- Legal team: legal@novatech.com
- CCPA request portal: requests.novatech.com/privacy

### **External**

- California AG CCPA resources
- CCPA regulations
- IAPP CCPA resource center

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*Related Documents: GDPR Compliance Guide (COM-DP-001), Privacy Policy (COM-DP-003), Data Retention Policy (COM-DP-005)*