



new revisions to the ccpa

Susan Kohn Ross
MSK Client Alert

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The California Consumer Privacy Act ("CCPA") took effect on January 1, 2020. In October 2019, the California Attorney General ("CA AG") published proposed regulations. In the lead up to January 1, 2020, the CA AG repeatedly made the point that those subject to the CCPA should plan for compliance with its broad principals by the first of the year, while admitting enforcement would not start until the regulations were final, meaning July 1, 2020. As part of this process, the CA AG advised he did not expect there to be significant changes to the regulations between October and July. However, upon receiving comments to those October proposed regulations, he changed his mind and on February 7, 2020 revised regulations were issued. A subsequent notice on February 10, 2020 corrected the earlier publication, which omitted certain updates.

To be clear, some of the changes were long awaited (such as what the "Do Not Sell My Personal Data" button looks like), while others were unexpected (such as the change to the training requirement by raising the level of records from four million to ten million). This Alert will summarize the key proposed changes...

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Susan Kohn Ross

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