

CLIENT ALERT

California Department of Justice Announces Public Forums on California Consumer Privacy Act (CCPA) as Part of Rulemaking Process

January 4, 2019

The California Department of Justice (DOJ) announces statewide forums to collect feedback as it develops regulations to implement the California Consumer Privacy Act of 2018 (CCPA).

The CCPA, signed into law on June 28, 2018, grants consumers new rights with respect to the collection and use of their personal information. Several important areas of the CCPA remain up to the rulemaking discretion of the California DOJ, and those regulations must be adopted by July 1, 2020. The final regulations will aim to establish procedures to facilitate how consumers exercise rights under the CCPA and to provide guidance to businesses for how to comply.

The California DOJ advised recently that it will hold six statewide forums in January and February 2019 to collect feedback from stakeholders early in the rulemaking process for the CCPA. These six statewide forums provide an opportunity for stakeholders, including businesses that may be covered by CCPA, to provide valuable insight and recommendations concerning the implementation of the CCPA.

Several important areas of the CCPA remain up to the rulemaking discretion of the California DOJ. The two most critical are arguably the standards for a “verifiable consumer request” and for “reasonable security measures.” Covered entities’ obligations to data subjects are triggered only by “verifiable consumer requests,” and companies will need to ensure that they only disclose consumer information to legitimate requestors. The CCPA creates a private civil cause of action against companies who allow consumers’ information to be compromised by a failure to implement “reasonable security measures,” but does not further define that obligation.

The California DOJ has invited all interested persons and parties to submit comments regarding the CCPA regulations at any of the six statewide forums, via mail or email. The schedule for the CCPA rulemaking workshops is set forth below.

Businesses that anticipate being covered by the CCPA may want to proactively engage with the California DOJ as it develops these important regulations.

CCPA Rulemaking Workshops

January 8, 2019 | 10 AM - 1 PM
Milton Marks Conference Center
455 Golden Gate Avenue
San Francisco, CA 94102

January 25, 2019 | 10 AM - 1 PM
Ronald Reagan Building
300 S. Spring Street
Los Angeles, CA 90013

January 14, 2019 | 10 AM - 1 PM

February 5, 2019 | 10 AM - 1 PM

California State University, San Marcos
333 S. Twin Oaks Valley Road
San Marcos, CA 92096

January 24, 2019 | 10 AM - 1 PM

Cesar Chavez Community Center
2060 University Avenue
Riverside, CA 92507

California State Building
1500 Capitol Avenue
Sacramento, CA 95814

February 13, 2019 | 10 AM - 1 PM

California State Building
2550 Mariposa Mall, Room 1036
Fresno, CA 93721

New Addition

The California Department of Justice recently announced an additional new public forum to be held at Stanford Law School on March 5, 2019.

March 5, 2019 | 12:45 PM

Stanford Law School
559 Nathan Abbott Way, Room 290
Stanford, CA 94305

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

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