



FOURTH SET OF MODIFICATIONS RELEASED FOR CA-CCPA REGULATIONS

On December 10, 2020, the California Attorney General's Office released a fourth set of proposed modifications made to the regulations regarding the California Consumer Privacy Act ("CCPA"). These modifications build upon the third draft set of modifications issued on October 12, 2020. See our prior ALERT dated [Oct. 14, 2020](#).

The fourth set of proposed modifications adds the "opt-out button" requirement that a business may use in addition to posting the notice of right to opt-out. The "opt-out button" was included in an earlier set of the CCPA regulations but was removed by the second set of proposed modifications. See our prior ALERT dated [Mar. 13, 2020](#).

On Election Day, the California Privacy Rights Act initiative, also known as "CCPA 2.0" was voted into law. The CCPA 2.0 expands and amends the CCPA creating new consumer privacy rights, privacy requirements and enforcement mechanisms. See our prior ALERT dated [Nov. 4, 2020](#). The new and modified obligations under the CCPA 2.0 will not go into effect until January 1, 2023. The Attorney General's office has yet to make a formal comment about the CCPA 2.0.

The deadline to submit comments to the proposed modifications is December 28, 2020. We continue to monitor updates on the CCPA. If you have any questions regarding the CCPA or need help developing a compliance program that complies with the CCPA, please let us know.

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