



October 4, 2021

CALIFORNIA PRIVACY AGENCY SEEKS COMMENT ON NEW CPRA REGULATIONS

The new California Privacy Protection Agency announced it is seeking input for developing regulations to implement Proposition 24, the California Privacy Rights Act of 2020 ("CPRA" a/k/a "CCPA 2.0"). See our ALERT dated [Nov. 4, 2020](#). The Privacy Protection Agency is the enforcement agency created by the CPRA to enforce California privacy laws. Previous regulations were issued in March of 2021 by the California Attorney General under the California Consumer Privacy Act of 2018. See our ALERTS dated [March 16, 2021](#), [Oct. 14, 2020](#) and [Dec. 11, 2020](#). The CPRA and its regulations comprise a general privacy law that applies to businesses generally in addition to the requirements of the Gramm-Leach-Bliley Act applicable to financial institutions.

The Privacy Protection Agency is seeking broad public input on all areas in the privacy sphere while specifically asking about the following topics:

- Cybersecurity audits and risk assessments;
- Automated decision-making technology;
- Audits of businesses performed by the Privacy Protection Agency, including the scope of audit authority, procedures and safeguards;
- Consumers' rights to manage their personal information, opt-out of and limit sharing of their personal information and businesses' duties to respond to consumer requests; and
- Definitions and categories in the CCPA.

The deadline to submit comments is November 8, 2021. We continue to monitor updates on the CCPA and routinely advise clients on CCPA compliance issues. If you have any questions or would like assistance in submitting a comment to the Privacy Protection Agency, please let us know. ☐

✧ *Elizabeth Anstaett and Ben Hurford*

LOOKING FOR A MARKETING AND PRIVACY COMPLIANCE RESOURCE?

We publish an easy-to-use reference, our **MARKETING AND PRIVACY DIGEST**, that compiles the state laws governing financial privacy, fair credit reporting, telemarketing/automatic dialing and announcing devices, telephone monitoring and recording, electronic signatures and restrictions on the use of social security numbers by financial service providers. Creditors, marketers and servicers should find this resource invaluable to marketing and privacy program development and regulatory compliance. **Contact us for details.**

Darrell L. Dreher
ddreher@dtlaw.com

Elizabeth L. Anstaett
eanstaett@dtlaw.com

Emily C. Cellier
ecellier@dtlaw.com

Susan L. Ostrander
sostrander@dtlaw.com

2750 HUNTINGTON CENTER
41 S. HIGH STREET
COLUMBUS, OHIO 43215
TELEPHONE: (614) 628-8000 FACSIMILE: (614) 628-1600
WWW.DTLAW.COM

To see previously sent ALERTS, visit our website at www.dtlaw.com

To decline future ALERTS, please contact us at ALERTS@DLTAW.COM. This ALERT has been prepared for informational purposes only. It does not constitute legal advice and does not create an attorney-client relationship.

Michael C. Tomkies
mtomkies@dtlaw.com

Susan M. Seaman
sseaman@dtlaw.com

Benjamin J. Hurford
bhurford@dtlaw.com

Judith M. Scheiderer
jscheiderer@dtlaw.com

Robin R. De Leo
robin@deher-la.com