



March 23, 2020

## CALIFORNIA ATTORNEY GENERAL HAS NO CURRENT PLANS TO DELAY CCPA ENFORCEMENT

On March 17, 2020, a group of 34 industry associates sent a letter to the California Attorney General asking him to delay enforcement of the California Consumer Privacy Act ("CCPA") until January 2, 2021. The letter defends the request by stating that many businesses have instituted mandatory work-from-home measures in response to COVID-19 and that these measures have made it difficult to build and test new systems and processes that comply with CCPA requirements.

The CCPA became effective January 1, 2020 with an enforcement date of the earlier of July 1, 2020 or six months after the publication of the final regulations. The California Attorney General has yet to formalize the CCPA regulations and is currently accepting comments in response to a second set of modifications to the proposed regulations released on March 11, 2020. See our prior ALERT dated March 13, 2020. The industry letter states that because of the delay of the final regulations, businesses are going to have very little time to assess what is required of them under the final regulatory scheme and to build those requirements into their business processes.

On March 19, 2020, Forbes reported that an advisor to the California Attorney General stated that there are no current plans to delay enforcement and that the California Attorney General's office encourages businesses to be particularly mindful of data security in this time of emergency.

We will continue to monitor and provide updates regarding the CCPA. We can assist businesses in complying with the privacy policy and notice requirements of the CCPA. Please contact us with any questions. □

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