

## Celebrus and The California Consumer Privacy Act - Assisting with the journey to compliance

The much-discussed California Consumer Privacy Act (CCPA) comes into force on 1st January 2020 – it provides Californian residents with a number of new data protection rights which organisations handling their personal data will be obliged to comply with.

Celebrus is a CCPA-compliant customer data platform which enables organisations who capture or process the data of Californian citizens to easily accommodate the new rights which the CCPA will bring them. Specifically, Celebrus provides organisations with an automated means of obtaining consent from customers to capture their data, and to manage the way in which this data is passed to downstream applications according to whether consent has been granted by individual customers. The Celebrus Customer Data Platform also provides organisations with a simple means of disclosing what data they have collected and processed, or deleting this data when individuals exercise their new rights.

### Key features of the CCPA:

- Applies to any company processing the personal data of California residents.
- Gives Californian citizens the following new rights in relation to personal data:
  - Right to know what personal information is being collected about them.
  - Right to know whether their personal information is sold or disclosed & to whom.
  - Right to veto to the sale of personal information.
  - Right of access to personal information.
  - Right to erasure of personal information.
  - Right to equal service and price, even if they exercise their privacy rights.
- The CCPA prohibits organisations from discriminating against citizens who exercise

their data privacy rights, although it does allow businesses to offer incentives for their consent capture and process data.

- Although organisations remain entitled to sell the personal data of adults who have not opted out, the CCPA requires organisations who sell the personal data of children aged 13-16 to have provided consent.
- The CCPA requires organisations to disclose the requested information free of charge within 45 days.
- CCPA penalties are capped at \$7,500 per violation for intentional violations with violations lacking intent subject to maximum fines of \$2,500.
- Significantly, the CCPA will empower citizens to undertake civil lawsuits, allowing them to recover \$100-750 per incidence of “nonencrypted or nonredacted personal information” breaches, without the need to demonstrate “actual damages” having occurred.

### Which organisations will be affected by the CCPA?

The CCPA applies to any organisation which:

- Markets to, or collects the personal information of Californian residents
- And meets one or more of the following thresholds:
  - Organisations with an annual gross revenue in-excess of \$25 million.
  - Organisations that buy, receive, sell or shares (for commercial purposes) the personal information of 50,000 or more Californian consumers, households or devices.
  - Organisations which derive 50 percent or more of its revenues from selling consumers’ personal information.

Organisations should regard compliance to the CCPA as a pre-requisite for digital marketing operations, regardless of their physical location, for the following reasons:

- California, the most populous state in the USA, is of significant economic importance. Californian regulations will affect a large proportion of businesses around the world;
- The CCPA is part of a global trend towards the adoption of more stringent data privacy laws, which have seen 10 additional US states and European Union member nations introduce similar legislation;
- While enforcement bodies have taken a measured approach when exerting new powers from regulations such as the GDPR, the CCPA may expose non-complying organisations to increased risk, by providing a framework for civil lawsuits from consumers.

## Challenges for affected organisations:

Millions of organisations who are subject to the CCPA are likely to face the following challenges:

- The requirement to enable individuals to opt in or out of data processing across all digital and offline channels.
- The ability to automatically suppress data processing and/or the sale of personal data for individuals who opt out.
- Efficient data gathering, delivery and deletion capabilities at scale for individuals who exercise their rights.

Organisations which aim to fulfil such challenges manually, or with non-specialist tools, may be unable to cope with the scale of requests.

## What does Celebrus do?

Celebrus captures the market's most complete picture of customer behaviour and experience, creating events and profiles in real-time for 1-to-1 personalisation and streaming analytics. Celebrus is quick and easy to deploy and connects to industry-standard data applications for customer

insight and engagement. Celebrus also gives clients complete control by enabling best-in-class privacy compliance and flexible options for hosting data on-premise or securely in the cloud.

By capturing customer consent preferences in real-time and enabling organisations to efficiently action data access or deletion request from Californian citizens, our unique technology can assist organisations in responding to the key elements of the CCPA.

## So how can Celebrus help with CCPA compliance?

Celebrus has enabled compliance for data protection laws in multiple jurisdictions for many years. The Celebrus Customer Data Platform includes the following features that support clients in achieving compliance:

- Interactive consent management interface which allows customers to make real-time changes to permissions in-session, across all digital channels.
- Celebrus ability to dynamically control of data capture and processing according to customer consent preferences ensures no data is collected for opted-out visitors.
- Supports rights of access, deletion and to opt out of data sales to third party by:
  - Passing consent status for individuals to downstream applications to prevent the sale of data for opted-out individuals.
  - Enabling complete audit trails with pre-built connectors to data warehouses which facilitate the fulfilment of access requests by Californian citizens.
  - Allowing captured PII data to be assembled and shared with users in a readable format.
  - Enabling the automated deletion of customer data upon request.
- For audit purposes, Celebrus enables the tracking of individuals across multiple domains, devices and sessions to quickly demonstrate compliance.



## What else can Celebrus assist with?

Celebrus has long-term established relationships with enterprise clients in finance, retail, travel, automotive and telco sectors – all are benefiting from the data that we collect in multiple use cases:

- Creating a seamless omnichannel customer experience.
- Enabling real-time 1-to-1 personalisation.
- Accelerating customer acquisition.
- Optimising products and trading.
- Growing existing customer sales.
- Optimising customer service.
- Improving compliance and risk management.
- Identifying fraud in transactional environments.

## What next?

- Acquaint yourself with the requirements of the CCPA at <https://www.caprivacy.org/>
- Investigate CCPA compliance initiatives within your organisation.
- Speak to Celebrus to discuss your compliance options.

## Contact us

Email [celebrus@d4t4solutions.com](mailto:celebrus@d4t4solutions.com) or call the expert team at Celebrus on +44 (0) 1932 893333 to discuss your options for the journey to compliance.

