

# **Enforcement Update & Priorities**

**July 16, 2024**

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**Deputy Director, Enforcement Division**

# **ENFORCEMENT IN THREE PARTS**

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# **PART 1:**

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## **BUILDING AN EFFECTIVE ENFORCEMENT DIVISION**

# ENFORCEMENT INFRASTRUCTURE



# **PART 2:**

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**OUR BUILDING SO FAR**

# STAFFING

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# STAFFING

Deputy  
Director of  
Enforcement

Assistant  
Chief  
Counsel

Enforcement  
attorneys

Staff  
Services  
Manager

Research  
Technologist  
Interns

Additional  
attorneys  
and support

# CASE MANAGEMENT

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**Legal  
Research**

**Document  
Management**

**Document  
Transfers**

**Attorney  
Training**



# CONSUMER COMPLAINTS

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# CONSUMER COMPLAINTS

2,176

COMPLAINTS

July 6, 2023 - June 30, 2024

84% CA RESIDENTS



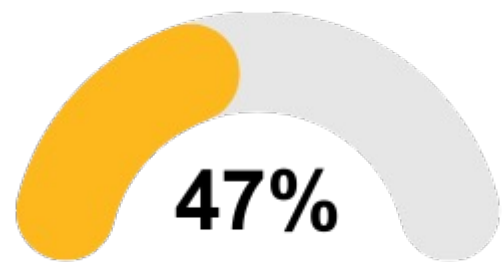
16% NON-CA RESIDENTS

# CATEGORIES OF COMPLAINTS

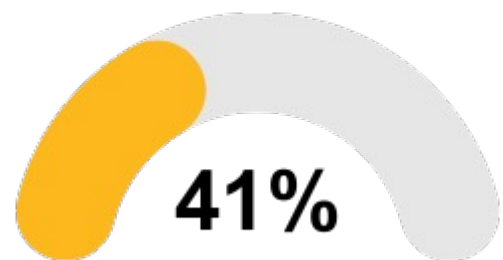
## MOST COMMON



**Right to delete**



**Collection, use, storing, or  
sharing of personal information**



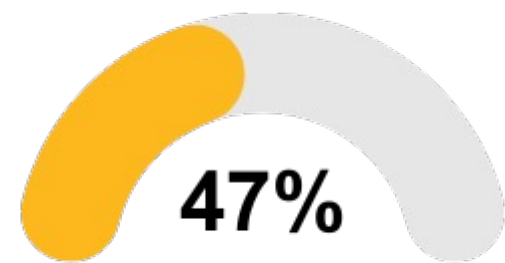
**Opt-out of the sale or sharing**

# CATEGORIES OF COMPLAINTS

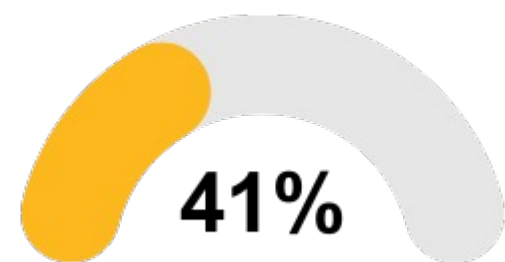
## MOST COMMON



**Right to delete**

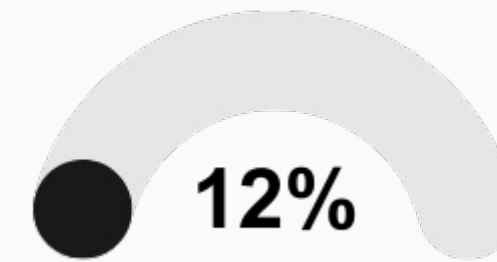


**Collection, use, storing, or sharing of personal information**

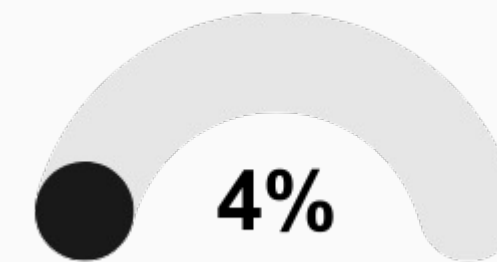


**Opt-out of the sale or sharing**

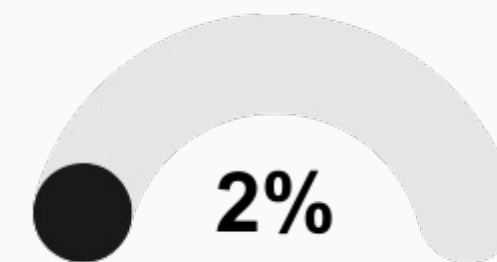
## LEAST COMMON



**Right to correct**



**Children's privacy**



**Financial incentive or loyalty programs**



# Process for complaints

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- 1 Every complaint is reviewed and evaluated**
- 2 Evaluation generally happens within the first week of submission**
- 3 Response to consumer occurs later**

# **Actions in response to complaints**

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# Recurring issues

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# ENFORCEMENT PROCESS



**Investigation Phase**



**Litigation Phase**





# **ENFORCEMENT PROCESS**

**Investigation Phase**

**Duration**

**Methods of engagement**

**Litigation Phase**



# INVESTIGATIONS

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# **PART 3:**

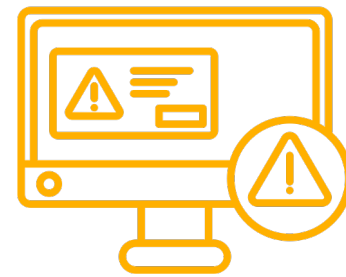
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## **THE YEAR AHEAD**

# Infrastructure in the year ahead



**Hiring underway for additional positions**



**Ongoing improvements to consumer complaint system**



**Enforcement website**

# ENFORCEMENT PRIORITIES

PRIORITIES DISCUSSED IN JULY



**Privacy  
notices and  
policies**



**Right to  
delete**



**Implementation  
of consumer  
requests**



# ENFORCEMENT ADVISORIES

- “Risk alert”
- “Compliance advisory”

# **ADDITIONAL PRIORITIES**

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# QUESTIONS / BOARD INPUT

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