



Accessible Deletion Mechanism – "Delete Request and Opt-Out Platform" (DROP)

California Privacy Protection Agency

October 4, 2024

AGENDA

1. Overview of the SB 362
2. Public Engagement
3. DROP System Overview
4. PAL Process
5. Next Steps

Overview of SB 362

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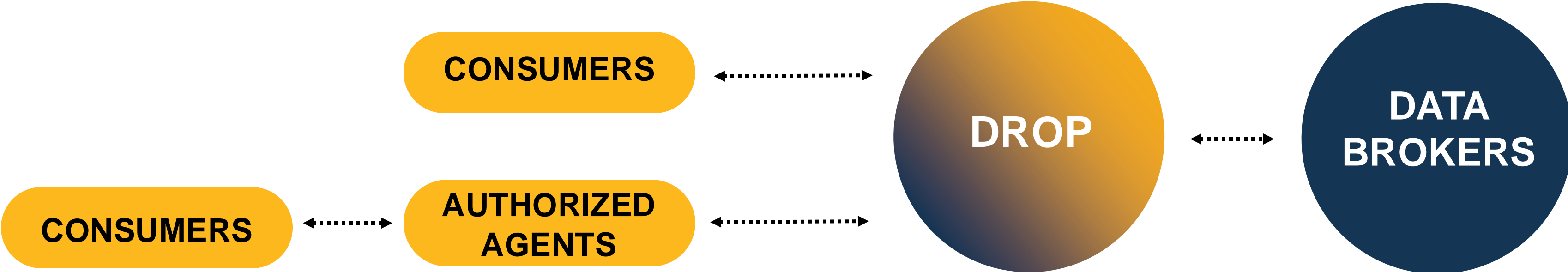
WHAT IS THE DELETE ACT?

- Data Broker Registry
- Accessible Deletion Mechanism (DROP)

SB 362 – THE DELETE ACT

WHAT IS THE “ACCESSIBLE DELETION MECHANISM”?

HOW WOULD IT WORK?



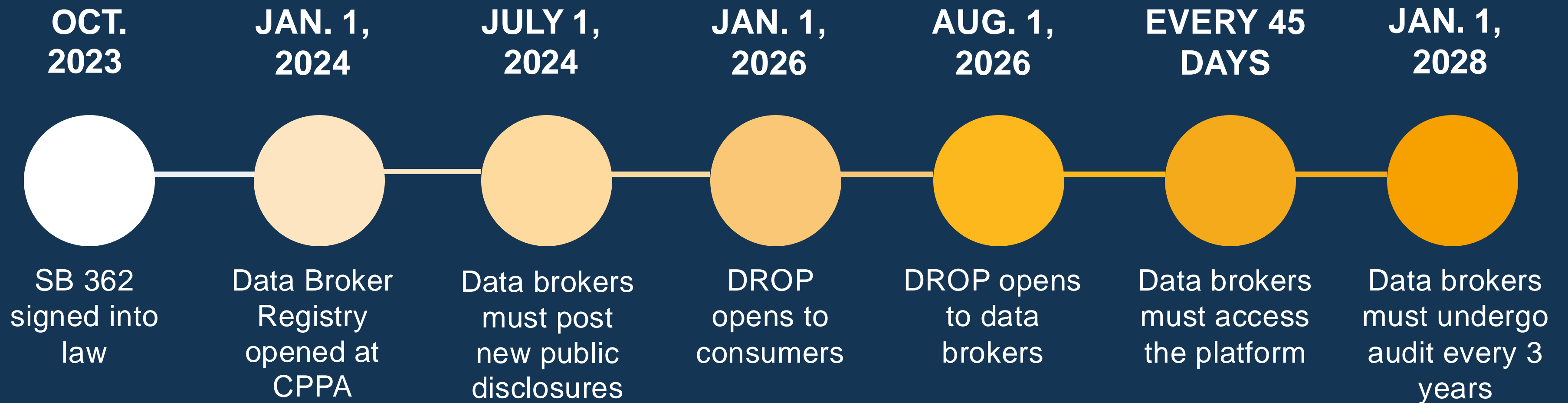
CONSUMER REQUIREMENTS

- ◆ Free for California consumers to use
- ◆ Secure and privacy-protecting
- ◆ Single, verifiable request to selected data brokers
- ◆ Allows authorized agents to submit requests on behalf of consumers
- ◆ Accessible and usable by consumers with disabilities
- ◆ Allows consumers to change their request after 45 days

DATA BROKER REQUIREMENTS

- ◆ Register annually (including payment of registration fee)
- ◆ Process consumer deletion requests at least once every 45 days
- ◆ Pay access fee when connecting to DROP
- ◆ Update mandatory public disclosures July 1 every year to report previous year activity
- ◆ Undergo independent audit every three years starting January 1, 2028

TIMELINE



Public Engagement

PUBLIC ENGAGEMENT

MARCH

FIRST SURVEY

10%

of all registered
data brokers at the
time

APRIL

1:1 CALLS

25

calls with large and small
companies, spanning the
industry: marketing, people
search, financial / credit
worthiness, health

MAY

PRELIMINARY
QUESTIONS

15

written comments

JUNE

STAKEHOLDER SESSION

17

oral comments

KEY TAKE-AWAYS FROM PUBLIC ENGAGEMENT

- ◆ Key identifiers used to identify a consumer record:
full name, email, phone, DOB, MAID
- ◆ API preferred over SFTP or email
- ◆ Dedicated help center
- ◆ Broad range of identity verification practices, including no verification, email only, government identification, among others.
- ◆ Maintain a suppression list

Overview of the System

CONSUMER USER JOURNEY

1

Jane Doe registers via DROP portal using their primary email address

2

California residency is established

3

Jane Doe optionally provides additional personal information to facilitate deletion request: email(s), phone(s), address(es) (present and past), DOB, and pseudonymous IDs (MAIDs, etc)

4

DROP system records that information in privacy protective manner

5

Jane Doe chooses which data brokers to send delete and opt-out requests (or ALL)

DATA BROKER USER JOURNEY

1

Business Y creates account

2

Complete registration: complete form and pay registration fee annually between Jan 1 – Jan 31

3

Select relevant deletion lists (i.e email, phone, MAID) to query as related data fields will be partitioned to safeguard privacy

4

Every 45 days query the API access new deletion requests

5

Within 45 days, provide an update to the CPPA with respect to the status of each deletion request

DROP Privacy Overview

*"The accessible deletion mechanism shall permit a consumer to securely **submit information in one or more privacy-protecting ways** determined by the California Privacy Protection Agency to aid in the deletion request."
Cal. Civ. Code § 1798.99.86(b)(2)*

Separate deletion requests into 4 lists by identifiers

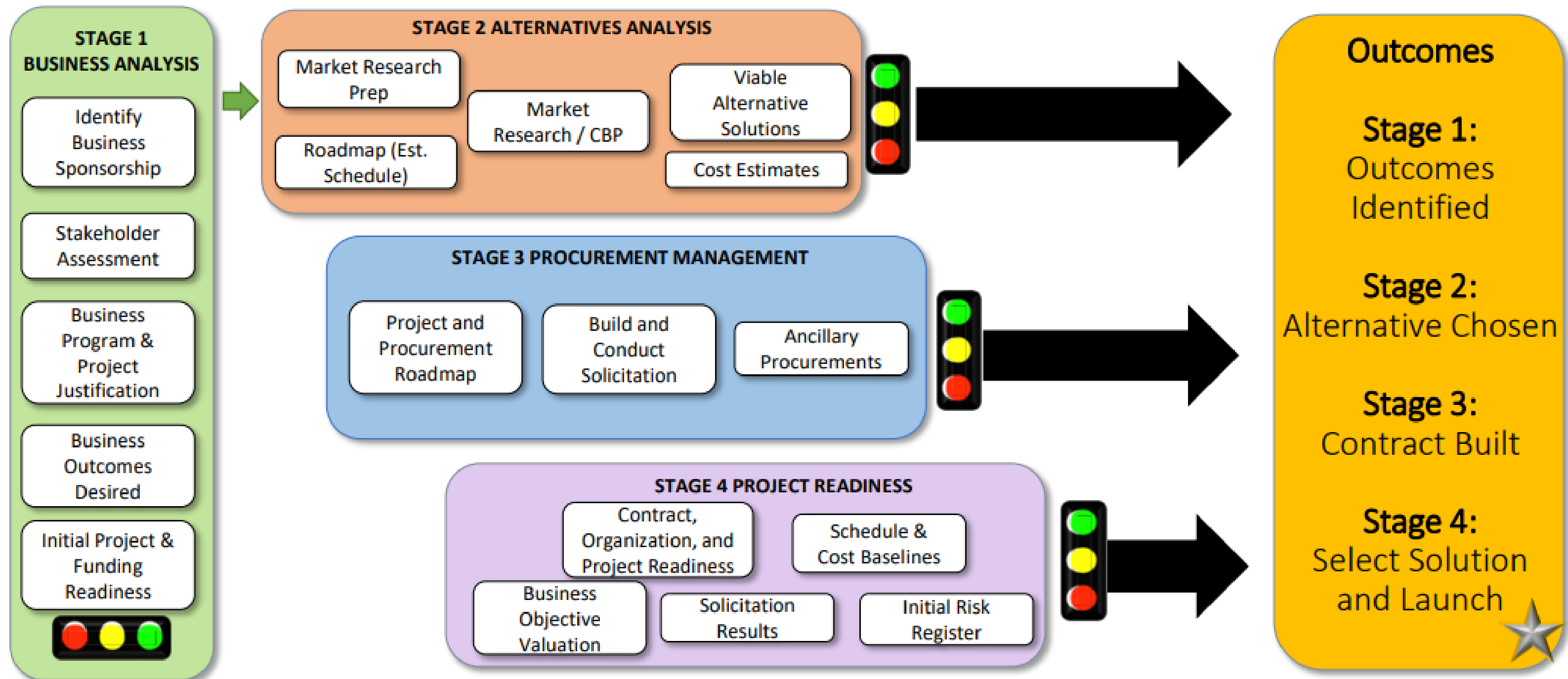
- Phone
- Email
- Full name, date of birth, address
- Pseudonymous IDs

One-way hash of all data

Data minimization practices

Project Approval Lifecycle (PAL)

PAL Framework 2022



Components of the PAL Process

What is the Project Development Process?

Stage 1 – Business Analysis

Agency Approval

- Identify Problem/Opportunity
- Establish Business Case/Need
- Ensure Strategic Alignment
- Assess Organizational Readiness

What do I have to do to move forward?

Stage 2 – Alternative Analysis

Department of Technology and Department Of Finance Approval

- Assess Existing Business Processes
- Market Research
- Develop Business Requirements
- Identify Solution alternatives
- Recommended Solution
- Procurement Strategy
- Project Timeline

How do I hire a vendor?

Stage 3 – Solicitation Analysis

Department of Technology Approval

- Develop Solution Requirements
- Develop Request for Proposal
- Procurement Documents

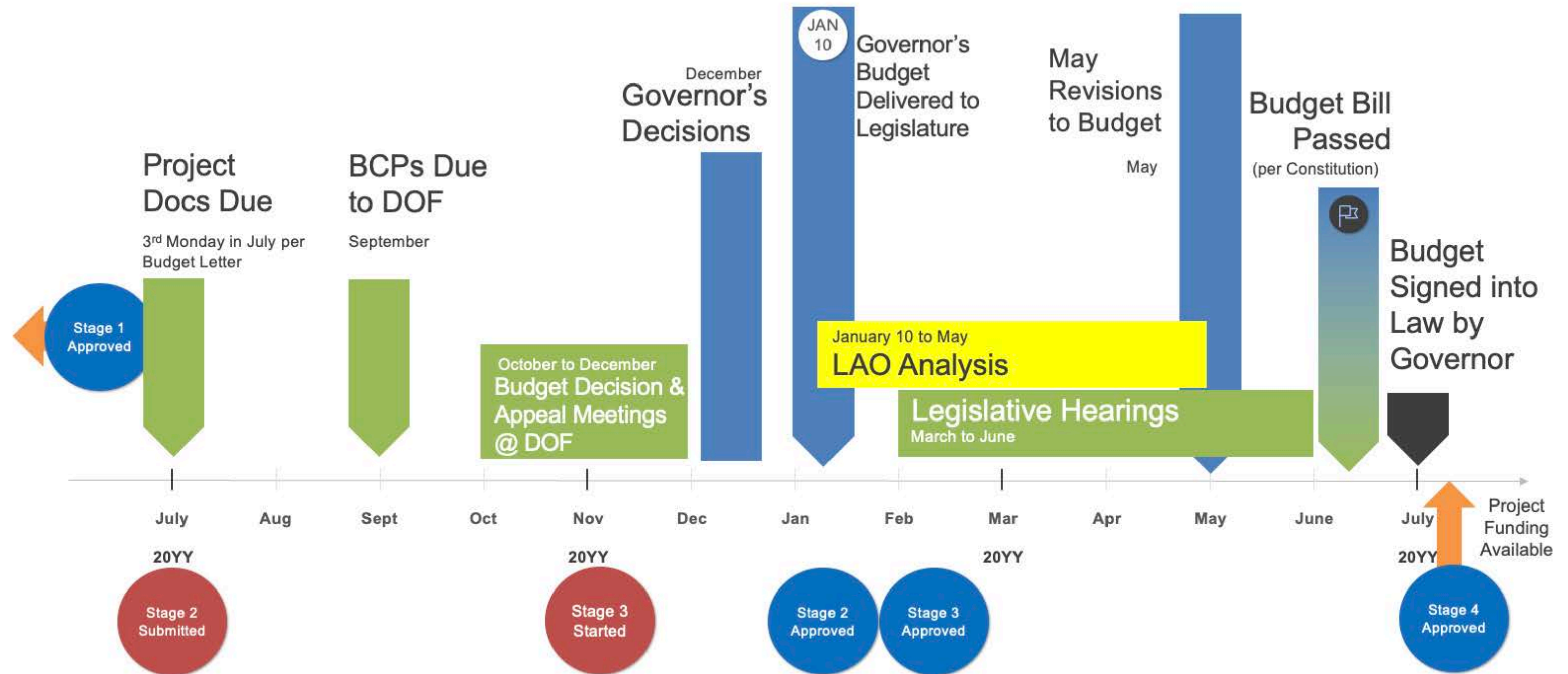
When do I award the Contract?

Stage 4 – Solution Analysis

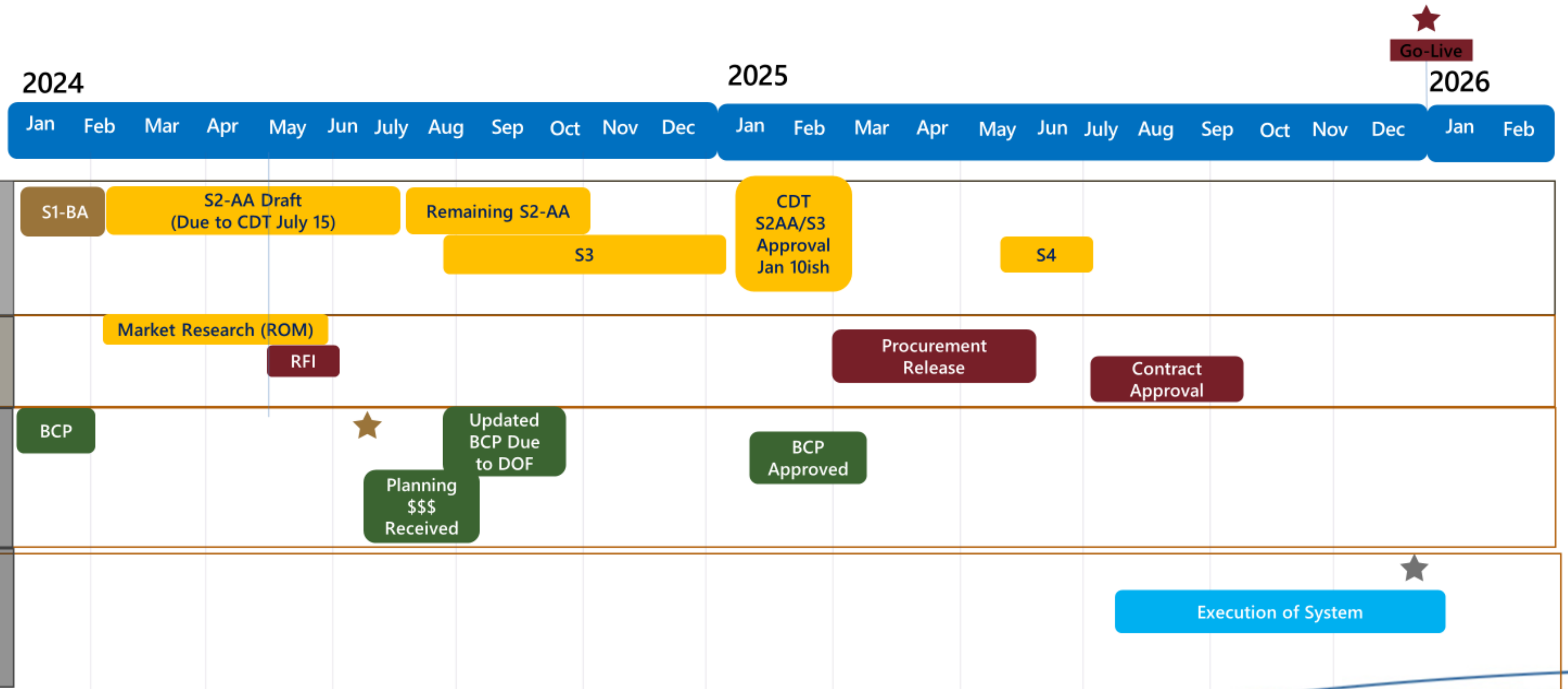
Department of Technology and Department Of Finance Approval

- RFP Solicitation
- Select Vendor
- Vendor Contract Management
- Assess project readiness
- Baseline Project
- DOF/Legislature Approval

Budget Timeline



Proposed PAL Timeline



PAL ENGAGEMENT AND OVERSIGHT

CALIFORNIA DEPARTMENT OF TECHNOLOGY

- Project Management team
- Project Approval Oversight team
- Statewide Technology Procurement & Dept' of General Services

DEPARTMENT OF FINANCE

CALIFORNIA PRIVACY PROTECTION AGENCY

Gov't. Code § 11545; Pub. Con. Code § 12100 et seq.; State Admin. Manual § 4800 et seq.

Next Steps

NEXT STEPS – DROP SYSTEM

Finalize Stage 2 artifacts

Procurement

Select vendor

System construction

DROP regulations

System testing

System launch (2026)

Public awareness campaign

User education

NEXT STEPS – DATA BROKER REGISTRATION

Data broker registration regulations finalized

Data broker fee determined for 2025 (DROP included)

Launch 2025 data broker registration

Maintain registry, including late registrations

Comments or Questions

