



Delete Act Update

California Privacy Protection Agency

March 7, 2025

AGENDA

- **Overview of the Delete Act**
- **Data Broker Registration Update**
- **Delete Request and Opt-Out Platform (DROP) Build Update**
- **Delete Request and Opt-Out Platform (DROP)**

Regulations Overview

- **Next steps**

Overview of the Delete Act (SB 362)

- **Data Broker Registration**
- **Delete Request and Opt-Out Platform (DROP)**




Data Broker Registration Update

Data Broker Registration Update

Published February 24, 2025

https://cppa.ca.gov/data_broker_registry/

Search:

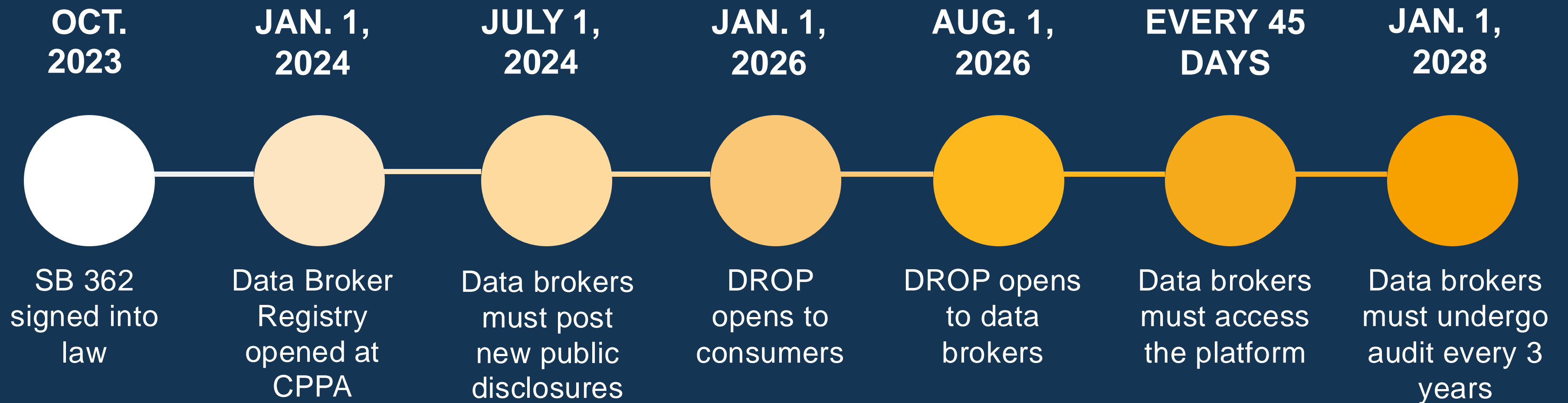
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01Advertising Inc. (CC)	privacy@01advertising.com	https://www.01advertising.com	No	Yes	No	View
33Across, Inc. (CC)	privacy@33across.com	https://www.33across.com/	No	No	No	View
360 Media Direct	privacy@360mediadirect.com	https://www.360mediadirect.com	No	No	No	View
4C Insights Inc.	ccpa@mediaocean.com	https://www.mediaocean.com/	No	No	No	View
6sense Insights, Inc.	privacy@6sense.com	https://www.6sense.com/	No	No	No	View
A Direct Marketing Inc (CC)	mark@bookyourdata.com	https://www.bookyourdata.com	No	No	No	View
abc	abc@gmail.com	https://www.abc.com	No	No	No	View

Delete Request and Opt-Out Platform (DROP) System Update

Data Broker Legal Requirements

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

TIMELINE



Procurement Update

- ◆ The Agency is partnering with the California Department of Technology (CDT) to build the Delete Request and Opt-Out Platform (DROP) system.
- ◆ Project includes supplemental IT procurements to support DROP development.

DROP System Overview: Consumer Experience

1

ID VERIFICATION

Verify residency using a third party

2

CONSUMER PERSONAL INFORMATION

Provide a minimal amount of personal information & authentication of certain data elements

3

SUBMIT REQUEST

Submit the request to all or a subset of registered data brokers

4

CHECK STATUS

Check status and/or update your deletion request in 45 days

DRDP System Overview: Data Broker Experience



How it Works



- Personal information stored in hashed format
- Limited personal information released based on data broker records

DROP System Overview: Agency Functionality

- Facilitate annual registration
- Audit compliance and investigate violations
- Verify consumer residency
- Support consumers and data brokers

Delete Request and Opt-Out Platform (DROP) and Data Broker Registration

Data Broker Regulations

Data Broker Requirements:

1. Account creation
2. Accessing and processing deletion requests
3. Reporting status of deletion requests to DROP
4. Deactivating account or ceasing to access deletion requests

Data Broker Regulations

Consumer and Authorized Agent Deletion Requests:

1. Residency verification, including ability to request review of residency
2. Deletion request content and process
3. Authorized Agent disclosure

NEXT STEPS

System Development: Continue DROP development, with testing to begin in fall 2025

Rulemaking: Commence formal rulemaking to ensure compliance with DROP launch in 2026

Public Awareness: Prepare education and promotion campaign for the public and data brokers

Comments or Questions

