

BEFORE THE CALIFORNIA PRIVACY PROTECTION AGENCY

In the Matter of:

Rickenbacher Data LLC d/b/a Datamasters

Respondent.

Case No. ENF25-172-D-DA

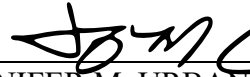
**ORDER OF DECISION**

The Board of the California Privacy Protection Agency hereby adopts the Stipulated Final Order, attached hereto, as its decision in the above-entitled matter.

This Decision shall become effective immediately.

IT IS SO ORDERED this 30th day of December, 2025.

BY THE BOARD:



JENNIFER M. URBAN

Chair

California Privacy Protection Agency

MICHAEL S. MACKO  
Deputy Director of Enforcement  
LARA KEHOE HOFFMAN  
Assistant Chief Counsel  
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BEFORE THE CALIFORNIA PRIVACY PROTECTION AGENCY

In the Matter of:

Rickenbacher Data LLC d/b/a Datamasters

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**STIPULATED FINAL ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-entitled matter:

**I. PARTIES**

1. Complainant is the Enforcement Division of the California Privacy Protection Agency (Agency), which enforces the California Consumer Privacy Act of 2018 (CCPA), Civ. Code §§ 1798.100 – 1798.199.100, as amended, and the data broker registration obligations contained in the Delete Act, Civ. Code § 1798.99.82(c).

STIPULATED FINAL ORDER

2. Respondent Rickenbacher Data LLC d/b/a Datamasters is a Texas limited liability company with its principal place of business in Flower Mound, Texas. Datamasters has conducted business within the State of California.

## II. JURISDICTION

3. Pursuant to Civil Code § 1798.99.82(c), the Agency may bring an administrative action against a data broker that fails to register with the Agency as required by law.

4. Pursuant to Government Code § 11415.60(a), the Agency may formulate and issue a decision by settlement, pursuant to an agreement of the parties, without conducting an adjudicative proceeding.

## III. FACTUAL FINDINGS

### A. Datamasters Buys and Resells Personal Information for Targeted Advertising

5. To facilitate targeted advertising, Datamasters buys and resells personal information for millions of people based on their characteristics, including health conditions such as Alzheimer's disease, drug addiction, bad breath, bladder incontinence, acid reflux, and more. As shown below, the home addresses, telephone numbers, and email addresses of millions of people who suffer from these conditions appear on lists that Datamasters buys and resells:

	Postal	Phones	Email
<b>Health</b>			
<b>Addiction</b>	<b>133,142</b>	<b>72,579</b>	<b>51,282</b>
Tobacco	97,573	53,767	37,741
<b>Ailments</b>	<b>13,537,899</b>	<b>6,454,306</b>	<b>2,947,445</b>
Acid Reflux	76,656	35,277	30,281
Acne	1,602,463	835,010	454,322
Actinic Keratosis	2,605	1,059	1,124
Aging	43,177	19,611	15,758
Alzheimer's	435,245	247,113	86,758
Anemia	26,103	16,041	7,527
Angina	21,054	13,372	3,659
Arteriosclerosis	1,977	983	724
Arthritis	2,453,711	1,113,120	639,120
Arthritis-Rheumatoid	1,611,964	777,259	340,829
Asthma	2,752,806	1,439,469	660,038
Asthma - Child	132,485	70,607	35,296
Athletes foot	82,007	40,128	22,457
Bad Breath	30,579	15,915	11,830
Bedwetting	209,605	112,020	51,650
Bladder Control	857,449	412,623	181,273
Blindness/Visual Impairment	2,317,141	1,062,145	623,592

6. Datamasters also buys and resells personal information based on ethnicity, age, and financial condition. For example, the company offers a “Senior List” of senior citizens and Baby Boomers, “mortgage lists” of homeowners who carry high-interest loans, and “Hispanic Lists” of more than 20 million people who have Hispanic surnames:

<b>SENIOR LIST</b> Our Senior Citizen and Baby Boomer Data is compiled through Public Records, Census Data, Credit Bureau Information + Multiple Proprietary Data Sources for Direct Mail, Telemarketing & Email Broadcasting. <a href="#">LEARN MORE</a>	<b>MORTGAGE LISTS</b> Our Mortgage Database is ideal for Mortgage Companies & Loan Officers who need to contact Homeowners with High-Interest Rates, who are in need of a Refinance. <a href="#">LEARN MORE</a>	<b>HISPANIC LISTS</b> We currently have on our USA Hispanic Database a little over 12.5 Million Hispanic Households and over 20 Million Individuals who have Hispanic Surnames. <a href="#">LEARN MORE</a>
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7. Datamasters offers targeted lists of people based on their behaviors, as well. For example, Datamasters offers mailing lists based on “purchase behavior and tendencies” such as consumers’ political views, grocery purchase patterns, retail purchase behavior, and investment activity, among others:

### Consumer Mailing Lists for Purchase Behavior and Tendencies

DataMasters also has a database of 3370 Consumer Predictor Models. This database uses customer relationships to then predict future customer purchases with high probability rates. You can start by selecting a model group from 16 main categories:

- ✓ Automotive Preferences
- ✓ Business Activity
- ✓ Communication Tendencies
- ✓ Credit Card User Details
- ✓ Financial and Banking Activity
- ✓ Consumer Behavior Patterns
- ✓ Grocery Purchase Patterns
- ✓ Health Purchase Patterns
- ✓ Insurance Products and Purchases
- ✓ Investment Activity
- ✓ Retail Purchase Behavior
- ✓ Media Use
- ✓ Non Profit Activity
- ✓ Political Affiliation
- ✓ Technology Preferences
- ✓ Travel and Entertainment Purchases

This data can be organized and customized to help you reach your target audience. You are then able to advertise directly to those who fall into the outline of your **target customer**.


8. Datamasters buys and resells this personal information by accessing databases licensed by third-party suppliers, including a “national consumer database.” As shown below, this national database “includes over 114 million households in the USA, with over 231 million individual names and addresses available for precise targeting and segmentation”:

## About Our Consumer Mailing Lists & Data Services

### We Offer Verified Consumer Mailing Lists and Databases Nationwide

Our national consumer database currently includes over 114 million households in the USA, with over 231 million individual names and addresses available for precise targeting and segmentation. Whether you're focused on income, location, or lifestyle preferences, our data helps you reach the right audience with confidence.

We have thousands of selections available. Please [click here](#) for the entire list of Consumer Selections. Our pricing starts at \$40/M with a 5000-name order.



9. Datamasters advertises access to “national” databases regardless of “whether you’re a local business or a national brand.”

10. Datamasters offers access to additional national databases as a one-time purchase, or as a “data feed” to deliver personal information on a recurring basis for a subscription fee, consisting of hundreds of millions of records:

## Bulk Database Purchases and Data Feeds

We offer Bulk Database Options designed for Telemarketers, Call Centers, Data Brokers, Data Resellers and Bulk Email Data Users. Below are some of our most popular Databases that have proven to be highly successful with our customers over the years.



### COMPILED USA CONSUMER DATABASE

- ✓ Total Records: 219 million
- ✓ Accuracy: 95% with quarterly updates
- ✓ Fields of Information: 350
- ✓ Full complete household database with approximately 60 million phone contacts available
- ✓ Database Price: \$9,500.00 to outright purchase with unlimited use and \$1,995 per quarterly update  
*(To qualify for this discounted rate, client must order entire Database.)*

### USA BUSINESS DATABASE

- ✓ Total Records: 15 million
- ✓ Accuracy: 95%, with quarterly updates
- ✓ Fields of Information: 30
- ✓ 12.5 million with business phone numbers
- ✓ Database Price: \$3,995 to outright purchase, \$900 per update  
*(To qualify for this discounted rate, client must order entire Database.)*

11. To remove any possible doubt about the company's national portfolio, Datamasters offers emails and mailing addresses for students "throughout the USA" and, as a sample of its product offerings, had posted an Excel spreadsheet to its website identifying 204,218 available records for students in California.

## B. The Agency Opened an Investigation

12. Datamasters did not register with the Agency as a data broker by the January 31, 2025 deadline. Thus, the Agency's Enforcement Division opened an investigation and contacted Datamasters.

13. Datamasters registered as a data broker shortly afterwards but denied engaging in data broker activity.

14. At first, Datamasters told the Agency it did "not do business or take orders of any kind" in California, and "does not do business in California with any entity, and we don't sell data products for either consumers or businesses" in California.

15. The Agency followed up, perceiving an inconsistency between these statements and those on Datamasters' website. The Agency confronted Datamasters with the Excel spreadsheet describing personal information of more than 200,000 California students.

16. Datamasters ultimately admitted that it had *received* Californians' personal information from its suppliers, but it asserted that Datamasters rejected any requests from its customers to *purchase* California-specific personal information.

17. At various points between 2020 and 2025, Datamasters did, in fact, reject certain requests to purchase California-specific personal information by citing California's privacy laws.

18. The Agency drilled down to understand whether Datamasters had similarly rejected requests to purchase nationwide data that encompassed California along with other states. The owner told the Agency that Datamasters had accepted and fulfilled orders for nationwide lists of consumers without screening them to remove Californians' personal information. The owner's statement underscored that Datamasters was collecting and selling Californians' personal information, despite the company's periodic refusals to fulfill California-specific orders.

19. A few days later, Datamasters retained counsel. The company backtracked on what it told the Agency about filling orders for nationwide lists of consumers, explaining that its statements were "incomplete and inaccurate as stated." Datamasters instead asserted that it "screens all lists sold" to ensure that they contained no California personal information.

20. Datamasters updated its website to match this assertion. Datamasters removed the Excel spreadsheet that described records of California students, added text to the bottom of its home page stating that the company does "not sell or provide data about California residents," and posted a "California Consumer Privacy Act (CCPA) Compliance Notice" stating that "all

products, services, and data offerings are restricted from use by or for individuals, businesses, or organizations covered by the [CCPA].”

21. Although Datamasters tried to comply with California’s privacy laws through a manual screening process at various points between 2020 and 2025, the company’s efforts were imperfect. Datamasters lacked sufficient written policies and procedures to ensure compliance with the Delete Act, and the parties propose this Stipulated Final Order in part to remedy those deficiencies.

**B. Datamasters Is a Data Broker Subject to the Delete Act and Failed to Register**

22. Datamasters is a for-profit legal entity that collects consumers’ personal information and determines the purposes and means of processing consumers’ personal information. Datamasters annually buys, sells, or shares the personal information of 100,000 or more consumers or households.

23. Datamasters conducted business as a data broker during the 2024 calendar year. Datamasters conducted business as a data broker by knowingly collecting and selling to third parties the personal information of consumers with whom the business did not have a direct relationship.

24. On or before January 31 following each year in which a business meets the definition of data broker, the business shall register with the Agency pursuant to the requirements in Civil Code § 1798.99.82(a).

25. Datamasters failed to register as a data broker with the Agency by the January 31, 2025 deadline.



#### **IV. CONTINGENCY**

26. This Stipulated Final Order shall be contingent upon approval by the Board of the California Privacy Protection Agency (Board). Datamasters understands and agrees that counsel for Complainant and the staff of the Agency may communicate directly with the Board and the staff of the Agency regarding this Stipulated Final Order, without notice to or participation by Datamasters or its counsel. By signing the Stipulated Final Order, Datamasters understands and agrees that it may not withdraw its agreement or seek to rescind the Stipulated Final Order before the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Order of Decision, the Stipulated Final Order shall be of no force or effect except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Agency shall not be disqualified from further action by having considered this matter.

#### **V. OTHER MATTERS**

27. The parties understand and agree that Portable Document Format (PDF) and facsimile copies of this Stipulated Final Order, including PDF and facsimile signatures thereto, shall have the same force and effect as the originals. The parties may execute this Stipulated Final Order in counterparts.

28. This Stipulated Final Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Final Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

29. In consideration of the foregoing stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order of Decision:

## **VI. ORDER**

### **IT IS HEREBY ORDERED that:**

30. Datamasters shall pay an administrative fine in the amount of forty-five thousand dollars (\$45,000.00 dollars) in accordance with Civil Code § 1798.99.82(e). The payment shall be made to the California Privacy Protection Agency no later than thirty (30) days after the effective date of the Board's decision approving the Stipulated Final Order pursuant to written instructions to be provided by the Enforcement Division.

31. Datamasters shall cease and desist selling Californians' personal information starting on December 31, 2025.

32. No later than December 31, 2025, Datamasters shall permanently delete all Californians' personal information, if any, that Datamasters previously purchased.

33. Within thirty (30) days after the effective date of the Board's decision approving the Stipulated Final Order, Datamasters shall adopt a written policy and implement a written procedure to ensure that it does not collect or sell personal information belonging to Californians when buying and reselling data. As part of this written policy and procedure, and to the extent that Datamasters, as a reseller, nonetheless receives California personal information as part of a larger purchase, Datamasters shall (a) permanently delete such information within twenty-four (24) hours of receipt, (b) instruct the sender not to disclose personal information of Californians in the future, (c) maintain a record of the number of the entities that disclosed Californians' personal information to Datamasters, and (d) produce that number to the Agency upon request.

Datamasters shall maintain and adhere to the written policy and procedure for five (5) years from the effective date of the Board's decision approving the Stipulated Final Order.

34. Within thirty (30) days after the effective date of the Board's decision approving the Stipulated Final Order, and if Datamasters has not already done so, Datamasters shall include and maintain a clear and conspicuous statement on its website and contact forms used for purchase orders or consultations that it does not buy or sell the personal information of Californians and shall modify its descriptions of national databases to clarify that Datamasters does not buy or sell the personal information of Californians.

35. Within thirty (30) days after the effective date of the Board's decision approving the Stipulated Final Order, and for a period of five (5) years thereafter, Datamasters shall maintain records of: (a) any transactions and communications with customers whose purchase orders included requests for Californians' personal information, and (b) any transactions and communications with data suppliers that included Californians' personal information. Datamasters shall make such records available to the Agency upon request. Where a customer requests Californians' personal information and is refused, and no such personal information is sold or shared with that customer, Datamasters may produce records that redact the customer's name. For clarity, this provision does not waive any of the Agency's rights under the law to seek this information in the future. It also does not require Datamasters to retain California consumers' personal information.

36. Datamasters shall, one (1) year after the effective date of the Board's decision approving the Stipulated Final Order, submit to the Agency a written summary of its privacy practices, including its written policy and procedure to effectively prevent the purchase and sale

of Californians' personal information. Datamasters shall timely respond to any further inquiries from the Agency.

37. Each party shall bear its own attorneys' fees and costs.

## **VII. ADDITIONAL GENERAL PROVISIONS**

38. Nothing in this Stipulated Final Order shall be construed as relieving Datamasters of its obligations to comply with all state and federal laws, regulations, or rules, or as granting permission to engage in any acts or practices prohibited by such law, regulation, or rule.

39. Datamasters shall use reasonable efforts to notify its officers, directors, employees, agents, and contractors responsible for carrying out and effectuating the terms of this Stipulated Final Order and the requirements therein.

40. Datamasters agrees that the terms of this Stipulated Final Order are in the public interest and fair, adequate, and reasonable under all the circumstances.

41. Datamasters admits the truth of the factual findings in paragraphs 1, 3-17, 19-20, and 24-25 of this Stipulated Final Order, but otherwise neither admits nor denies the remaining factual findings in this Stipulated Final Order. Datamasters agrees to be bound by the terms of this Stipulated Final Order.

42. Datamasters hereby waives the right to any hearings, and to any reconsideration, appeal, or other right to review which may be afforded pursuant to the California Administrative Procedures Act, the California Code of Civil Procedure, or any other provision of law. By waiving such rights, Datamasters effectively consents to this Stipulated Final Order becoming final.

43. Nothing in this Stipulated Final Order shall constitute or be construed as a release from liability for any violations of law other than Datamasters' violation of the Delete Act, Civil

Code § 1798.99.82(c), arising from the company's failure to register as a data broker with the Agency between February 1, 2025 and September 13, 2025.

44. This Stipulated Final Order shall bind Datamasters' heirs, administrators, executors, successors, and transferees.

45. Notwithstanding paragraph 37, in the event the Agency prevails in seeking to enforce any term of this Stipulated Final Order, the Agency shall be entitled to an award of attorney fees and costs in its favor and against Datamasters for the time spent and costs incurred in prosecuting such action.

46. Failure to complete the payment or comply with any terms of this Stipulated Final Order shall result in enforcement of the Order in the Superior Court.

47. Any notices and reports under this Stipulated Final Order shall be served by email as follows:

To the Complainant:

Deputy Director, Enforcement Division  
California Privacy Protection Agency  
400 R St., Suite 350  
Sacramento, CA 95811  
[ENF-processing@cppa.ca.gov](mailto:ENF-processing@cppa.ca.gov)

To the Respondent:

David Rickenbacher  
Rickenbacher Data LLC d/b/a Datamasters  
6101 Long Prairie Rd. #744  
Flower Mound, TX 75028  
[sales@datamasters.org](mailto:sales@datamasters.org)

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### VIII. ACCEPTANCE

I have carefully read the above Stipulated Final Order and have had the opportunity to seek and consult with an attorney. I understand the stipulation and the effect it will have on Datamasters. I enter into this Stipulated Final Order voluntarily, knowingly, and intelligently, and agree to be bound by the Order of Decision by the Board of the California Privacy Protection Agency.

Dated: 12/12/2025

David Rickenbacher

DAVID RICKENBACHER  
Founder/Owner  
RICKENBACHER DATA LLC d/b/a Datamasters  
*Respondent*

### AS TO FORM AND CONTENT:

Dated: 12/12/2025

/s/ Michele Ferri

JONATHAN LURIE, ESQ.  
MICHELE FERRI, ESQ.  
The Law Offices of Lurie and Ferri, LLP  
1000 Nicasio Valley Road  
Nicasio, CA 94946  
*Attorneys for Respondent*

## IX. ENDORSEMENT

The foregoing Stipulated Final Order is hereby respectfully submitted for consideration by the Board of the California Privacy Protection Agency.

DATED: 12/12/2025

Respectfully submitted,



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MICHAEL S. MACKO  
Deputy Director of Enforcement



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LARA KEHOE HOFFMAN  
Assistant Chief Counsel



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ANGIE JIN  
Attorney  
Enforcement Division  
*Attorneys for Complainant*