
CALIFORNIA PRIVACY PROTECTION AGENCY

400 R ST. SUITE 350
SACRAMENTO, CA 95811
cppa.ca.gov



INVITATION FOR PRELIMINARY COMMENTS

NOTICES & DISCLOSURES AND EMPLOYEE DATA

The California Privacy Protection Agency (CalPrivacy) is exploring whether regulatory changes related to notices and disclosures, or employee data are necessary. (See Gov. Code §§ 11346(b), 11346.45.) CalPrivacy seeks input from stakeholders on both of these topics and is accepting preliminary comments through May 20, 2026.

Invitation for Preliminary Comments

The California Consumer Privacy Act (CCPA) and CalPrivacy’s implementing regulations require businesses to provide consumers with notices explaining their privacy practices, including a privacy policy, Notice at Collection, and notices about consumers’ privacy rights. (Civ. Code §§ 1798.100-135; Cal. Code Regs., tit. 11 §§ 7002, 7003, 7004, 7010-7016, 7020-7028, 7220.) These and other CCPA requirements also apply to businesses’ processing of employees’ personal information. (Civ. Code §§ 1798.140(i), 1798.145(m); Cal. Code Regs., tit. 11 §§ 7002, 7003, 7004, 7011, 7012, 7020-7028, 7050-7053, 7060-7063, 7080-7081.) CalPrivacy is exploring whether these regulations should be amended, and whether new regulations addressing these topics should be adopted.

CalPrivacy is particularly interested in receiving comments addressing the questions provided below. Additionally, stakeholders may want to propose specific language for new regulations related to notices and disclosures, or employee data. Commenters are encouraged to review the short “[Tips for Submitting Effective Comments](#)” guide for help formulating and submitting effective comments.

Questions for Preliminary Comment

I. Notices and Disclosures

1. When reviewing a privacy policy or similar disclosure, what is the most important information to consumers? What information about a business’s collection, use, disclosure, and retention of personal information do consumers want but currently cannot find in existing privacy policies or similar disclosures?
2. What language in privacy policies do consumers find confusing, unclear, or difficult to understand? How can CalPrivacy address this issue?
3. What challenges do businesses experience when describing information practices in a privacy policy or other disclosures to consumers? How can the regulations address this issue?

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4. What are effective ways for consumers to receive notice of their CCPA rights and how to exercise those rights?

For example, how do effective notice mechanisms differ across mobile apps, internet connected devices, smartwatches, smart TVs, home appliances, gaming systems, or other interfaces that do not support traditional webpage-based notices?

5. What challenges do businesses face when providing notices, including opt-out links, across different devices or platforms? How can the regulations address this issue?
6. Please provide examples of effective consumer notices and disclosures. If possible, please provide information about specific testing, studies, or data demonstrating their effectiveness.
7. What else should CalPrivacy consider regarding CCPA notice and disclosure requirements?

II. Employee Data

For purposes of these questions, “employee” includes current and former employees as well as current and former independent contractors.

1. What are your expectations or concerns regarding why businesses collect, use, disclose, or retain your personal information as a job applicant or employee?
2. Have you received a copy of a business’s privacy policy, Notice at Collection, or CCPA rights’ notices as a job applicant or employee?

- a. Identify each notice you have received and describe your experience receiving the notice.

For example, how did you receive the notice(s), at what point in the employment life cycle (hiring, working, offboarding) did you receive the notice(s), and what was the most helpful information in the notices.

- b. Do you have any suggestions on how to improve the effectiveness of the notice?
3. What challenges do businesses experience when providing a privacy policy, Notice at Collection, or CCPA rights’ notices to job applicants and employees?

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4. Have you exercised your CCPA rights as a job applicant or employee?
 - a. Describe your experience exercising your rights.
 - b. Describe any challenges you experienced when exercising your rights.
 - c. Do you have any suggestions on how to improve the experience?

5. What challenges do businesses experience when providing job applicants and employees with the ability to exercise their privacy rights? How can the regulations address this issue?

6. What steps do businesses take to oversee their service providers' and contractors' CCPA compliance, and what challenges do businesses face when doing so?

For example, do businesses conduct audits of these entities or test the service provider's or contractor's systems? How effective are these audits and tests to assess a service provider's or contractor's CCPA compliance?

7. What else should CalPrivacy consider regarding CCPA requirements for job applicants and workers in the employment lifecycle (hiring, working, and offboarding)?

Time Period to Submit Preliminary Comments

CalPrivacy will be accepting preliminary comments from April 20, 2026 until 5:00 p.m. PT on May 20, 2026.

Where to Submit Preliminary Comments

Electronic Submission:

Comments may be submitted electronically to regulations@cppa.ca.gov. Please include **"Preliminary Comment - Notices & Disclosures and Employee Data April 2026"** in the subject line.

Mail Submission:

California Privacy Protection Agency
Attn: Legal Division – Regulations
400 R St., Suite 350
Sacramento, CA 95811

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Preliminary Comments

The preliminary comments sought in this invitation are to assist CalPrivacy with its preliminary rulemaking activities and do not reflect any decisions made by CalPrivacy regarding future rulemaking. If CalPrivacy decides to propose regulations, a formal public comment period will be held at a later time during the formal Administrative Procedure Act rulemaking process. All preliminary comments received by CalPrivacy are public records subject to disclosure and may be included in future rulemaking packages.

Questions

Questions regarding this Request for Preliminary Comments may be directed to regulations@cppa.ca.gov.