CALIFORNIA PRIVACY PROTECTION AGENCY

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INVITATION FOR PRELIMINARY COMMENTS

REDUCING FRICTION IN THE EXERCISE OF PRIVACY RIGHTS
AND OPT-OUT PREFERENCE SIGNALS

The California Privacy Protection Agency (CalPrivacy) is exploring whether regulatory changes related to reducing friction in the exercise of privacy rights, or to opt-out preference signals, 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 April 6, 2026.

Invitation for Preliminary Comments

The California Consumer Privacy Act (CCPA) and CalPrivacy's implementing regulations require businesses to provide consumers with privacy rights, including the rights to delete, correct, know, opt-out of sale/sharing, and limit the use of their sensitive personal information. (Civ. Code §§ 1798.105–106, 1798.110, 1798.115, 1798.120–121); Code Regs., tit. 11 §§ 7004, 7020–27, 7060–63, 7221). They also require businesses to process opt-out preference signals as valid requests to opt-out of sale and sharing of personal information. (Civ. Code §§ 1798.135, 1798.185(a)(18)-(19); Code Regs., tit. 11 §§ 7025-7026). 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 that reduce friction in the exercise of privacy rights, or comment on how consumers use opt-out preference signals and how businesses process opt-out preference signals. 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.   *Reducing friction in the exercise of privacy rights*

1.   What challenges do consumers experience when they exercise their privacy rights, and how can the regulations address them?

For example, consumers may experience challenges, including but not limited to: locating information about privacy rights and how to exercise them; user-interface designs that may impair or interfere with consumers' ability to make privacy choices; verification of identity; using authorized agents; request-submission limits; and modifying privacy choices consumers previously made. If you identify a challenge, explain in detail what is difficult and provide any information about how you think it can be addressed.

2. What challenges do businesses experience when they provide consumers with the ability to exercise their privacy rights, and how can the regulations address them?

   For example, businesses may experience challenges, including but not limited to: presenting information about privacy rights and how to exercise them; designing user interfaces that make it easy for consumers to make privacy choices; verification of identity; and receiving requests from, and interacting with, authorized agents.

3. What are the top three things CalPrivacy should prioritize in reducing friction in the exercise of privacy rights, and why? If you have identified ways to reduce friction, what would the benefits be of reducing friction?

4. Do the current regulations sufficiently address the challenges consumers experience when they exercise their privacy rights? If not, how should CalPrivacy revise its regulations to sufficiently address those challenges?

5. Do the current regulations sufficiently address the challenges businesses experience when they provide consumers with the ability to exercise their privacy rights? If not, how should CalPrivacy revise its regulations to address those challenges?

   For example, if lack of standardization or uniformity in how businesses handle consumers' privacy-rights requests is a challenge, how should CalPrivacy address that?

6. What else should CalPrivacy consider to reduce friction in consumers' exercise of their privacy rights?

II. *Opt-out Preference Signals*

1. Have you used an opt-out preference signal, like Global Privacy Control, or an age-signal mechanism before?

   a. Describe your experience using an opt-out preference signal or age-signal mechanism.

   b. Do you have any suggestions on how to improve the experience?

   c. What are your expectations when using an opt-out preference signal?

2. What challenges do businesses face in processing opt-out preference signals, like Global Privacy Control?

   a. How are businesses applying the signal to "known" consumers and pseudonymous profiles, and across different browsers, devices, or identifiers?

3. Is there anything that requires additional clarity or guidance in the form of a regulation relating to OOPS?

Time Period to Submit Preliminary Comments

CalPrivacy will be accepting preliminary comments from March 6, 2026 until 5:00 p.m. PT on April 6, 2026.

Where to Submit Preliminary Comments

Electronic Submission:

Comments may be submitted electronically to regulations@cppa.ca.gov. Please include "**Preliminary Comment - Reducing Friction & OOPS March 2026**" in the subject line.

Mail Submission:

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

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 Invitation for Preliminary Comments may be directed to regulations@cppa.ca.gov.