

CCPA/CPRA Compliance Checklist

The compliance process for the CCPA/CPRA is complex, and regulations are continually updated.

Meeting these requirements involves multiple steps, from determining whether the law applies to your business and updating documents such as your Privacy Policy to implementing "Do Not Sell or Share My Personal Information" and other required links, reviewing supplier contracts, and conducting regular audits.

For easier review, the requirements are organized into five phases: Assess, Document, Implement Rights, Govern, and Secure and Audit. Keep this checklist as a reference as you work through your CCPA/CPRA compliance.

Assess:

- ☐ Confirm you meet a threshold (\$26.625M / 100k / 50%)
- ☐ Determine if employee and B2B data now applies to you
- ☐ Run a data map (PI, SPI, sources, recipients, retention)

Document:

- ☐ Update notice at collection (categories, purpose, sale/share, SPI, retention)
- ☐ Update privacy policy annually (all required disclosures)
- ☐ Publish a cookie/consent policy

Implement rights:

- ☐ Add "Do Not Sell or Share My Personal Information" link
- ☐ Add "Limit the Use of My Sensitive Personal Information" link
- ☐ Honor Global Privacy Control / opt-out preference signals
- ☐ Provide two request methods (phone/email/form); opt-outs within 15 business days, responses to requests within 45 days
- ☐ Honor minor opt-in (13-16) and parental consent (under 13)

Govern:

- ☐ Execute compliant contracts with all service providers/contractors/third parties
- ☐ Apply data minimization, purpose limitation, storage limitation

Secure and audit:

- ☐ Implement reasonable security (incl. MFA, encryption)
- ☐ Conduct annual cybersecurity audit + risk assessments if high-risk (submit to CPPA)
- ☐ Re-scan and review regularly