

CCPA

What does California's new privacy act mean for agencies, marketers and technology providers?

WHAT IT IS

The California Consumer Privacy Act, or CCPA, which becomes operative on January 1, 2020, intends to provide Californians with the right to:

- know what personal information is being collected about them;
- know whether their personal information is sold or disclosed and to whom;
- say "no" to the sale of personal information;
- access their personal information; and
- equal servicing and pricing, even if they exercise their privacy rights.

WHAT IT ISN'T

Importantly, *the CCPA does not prevent companies from collecting personal information*. Rather, the CCPA provides the rights for Californians to exercise control over their personal information, before and after it is collected. It provides guidance to companies on how to make sure Californians can fully exercise those rights.

WHAT CONSTITUTES "PERSONAL INFORMATION?"

Does the CCPA apply to your practices? The CCPA defines personal information as "information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household." At Alphonso, we have designed our processes to rely on as little personal information as possible, but because we do collect IP addresses, we are subject to the requirements of the CCPA. The same applies to any company using IP addresses for ad targeting, measurement, or attribution.

PREPARE TO SHARE

Under the CCPA, companies must comply with consent and disclosure requirements that describe the types of information collected, how that information is used, and the kinds of parties with which the information is shared.

Fortunately, such disclosures were always part of our practices, and were refined through work done to comply with the European Union's General Data Protection Regulation (GDPR). Despite the limited amount of personal information collected through our processes, we and others must make it easy for Californians to manage their privacy choices.

Alphonso and others must do the following in response to a consumer request:

- ✓ Disclose the categories of personal information collected, the categories of the sources of that data, its commercial purpose, the categories of third parties with whom it was shared, and the specific pieces of personal information collected.
- ✓ Disclose any information that was sold or otherwise disclosed, the categories of personal information collected, the categories of personal information that were sold, and the categories of third parties to whom the personal information was sold.
- ✓ Allow opt-out of any further data collection unless, of course, the consumer decides to re-opt-in to services at some later time.



Contact:

Tom Cushing
Chief Privacy Officer and General Counsel
Alphonso Inc.
tom.cushing@alphonso.tv

CCPA

What does California's new privacy act mean for agencies, marketers and technology providers?

ALPHONSO IS READY FOR CCPA

To assure that we are in compliance with the CCPA, Alphonso set out with the following goals in mind:

- First and foremost, make sure that all of the disclosures we make to consumers are complete and simple to understand.
- Provide contact information and methods so that consumers can easily communicate with us, including a “Do Not Sell My Personal Information” link on our website.
- Have a process in place so that we can verify a consumer’s request (to make sure we are providing the proper information to that particular consumer).
- Have a process in place so that we can quickly and easily locate a particular consumer’s personal information within our systems, and are able to inform the consumer how the information was used (for example: the categories of personal information that have been collected; the categories of sources from which the personal information was collected; the purpose for collecting or selling personal information; the categories of third parties with whom any personal information may have been shared; the specific pieces of personal information that were collected; and, if applicable, the categories of consumers’ personal information that has been sold).
- Have a process in place so that we can delete the personal information relating to a particular consumer, and assure that if any service providers have been provided with that personal information, that they too delete all such information.
- Have a process in place so that we can opt-out a consumer from the sale of their personal information.
- Not take any adverse actions against a consumer who has exercised any of their rights under the CCPA.

Finally, we want to be sure that we remain flexible and ready to make future changes. We expect additional guidance to come out of the California Attorney General’s office, which may affect the way the above stated goals are implemented. We are also ready to be able to adjust our process to comply with the privacy laws of other states, or even perhaps one day with a Federal privacy law.

