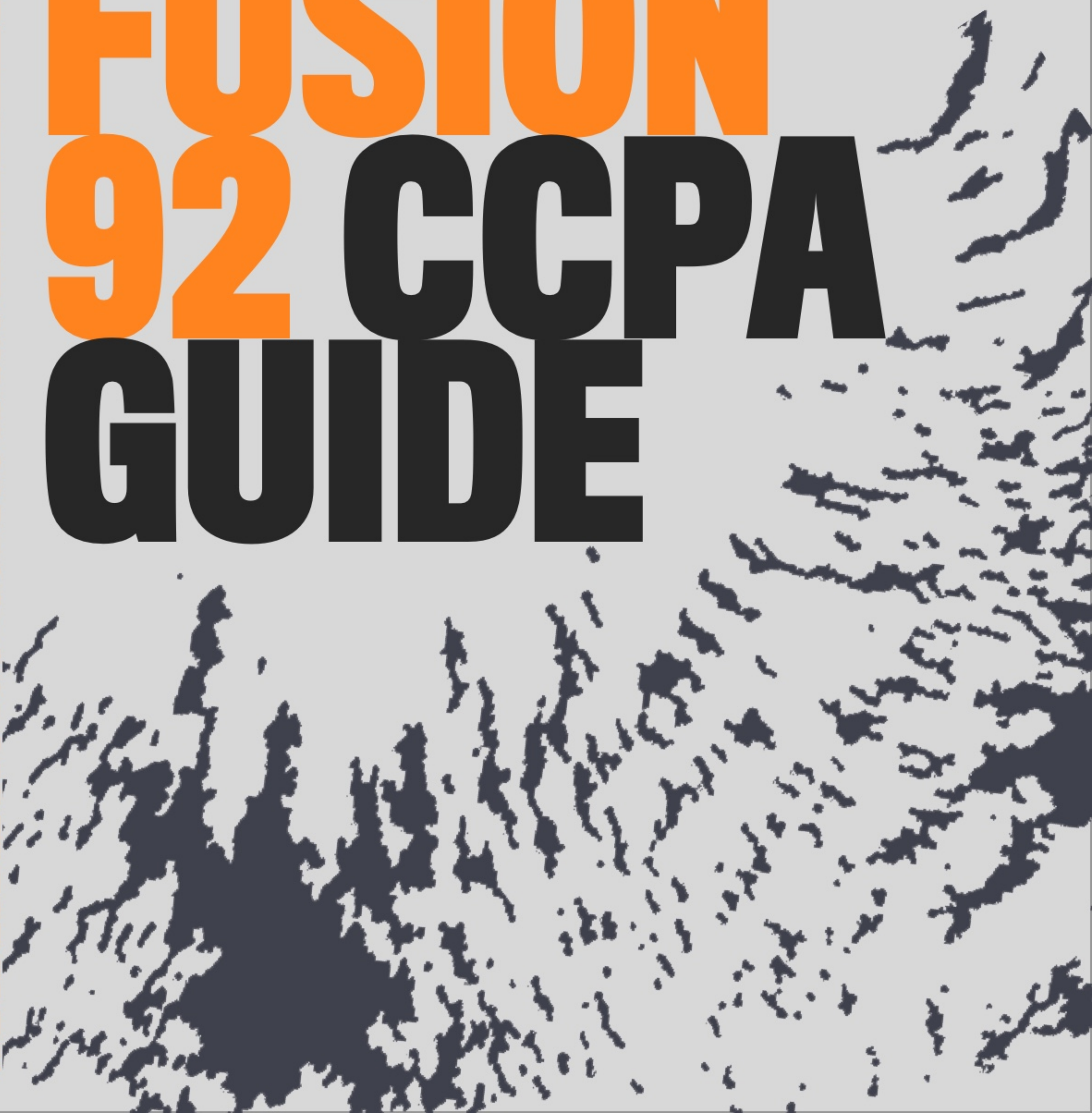




FUSION 92 CCPA GUIDE





HOW DID WE GET HERE?



GDPR AND THE SPECTER OF CONSUMER LEGISLATION

On May 25, 2018, the General Data Protection Regulation (GDPR) went into effect across the European Union. In the age of big data – and subsequently big data breaches – GDPR was the first major piece of legislation aimed squarely at curtailing businesses' ability to collect and use consumer data. GDPR has only been in effect for about a year, but businesses are already feeling its sting. In January 2019, France fined Google €50 million – the first multi-million dollar fine imposed under GDPR, but certainly not the last.

ENTER: CCPA

While GDPR was a wake-up call for businesses around the world, companies that only did business in the United States were not immediately affected. That changed about a month later, however, when the California legislature passed the California Consumer Privacy Act (CCPA). Largely derived from the framework of GDPR, CCPA sought to bring similar consumer data privacy protections stateside. And, while the law technically only applies to companies that do business in California, the state's enormous size and economic significance make it hard to ignore.

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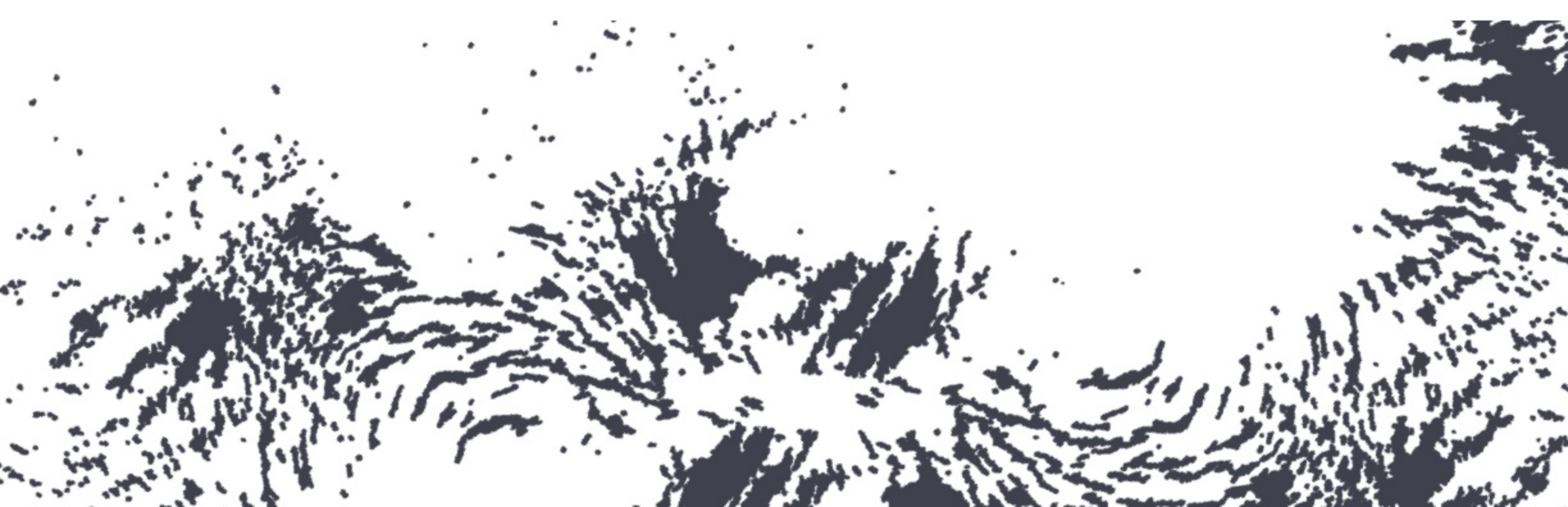
A WORD ABOUT THE AUTHORS

About Fusion92

Fusion92 is an award-winning marketing innovation agency that delivers business results for clients all over the world. What that means in practice is first-of-their-kind, patented media, creative, data and technology solutions. Ideas that are data-fueled and insight-driven.

About Kavi Global

Kavi Global is an award-winning data analytics company with 50+ years of corporate experience. With over 20 data scientists and data engineers on board, our services cover the full spectrum of data analytics, including strategy, implementation and support.



THE LETTER OF THE LAW



CCPA goes into effect January 1, 2020. Like GDPR, it's a wide-ranging piece of legislation, but it can be summed up in a handful of key tenets. Under CCPA, all California residents will have 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
- Receive equal service and price, even if they exercise their privacy rights

What qualifies as “personal information?”

The short answer is pretty much anything and everything. This includes, but isn't limited to, consumers':

- | | | |
|------------------|----------------------------|-------------------------|
| • Name | • Phone number | • Financial information |
| • Postal address | • Account name | • Medical information |
| • IP address | • Social security number | |
| • Email address | • Physical characteristics | |

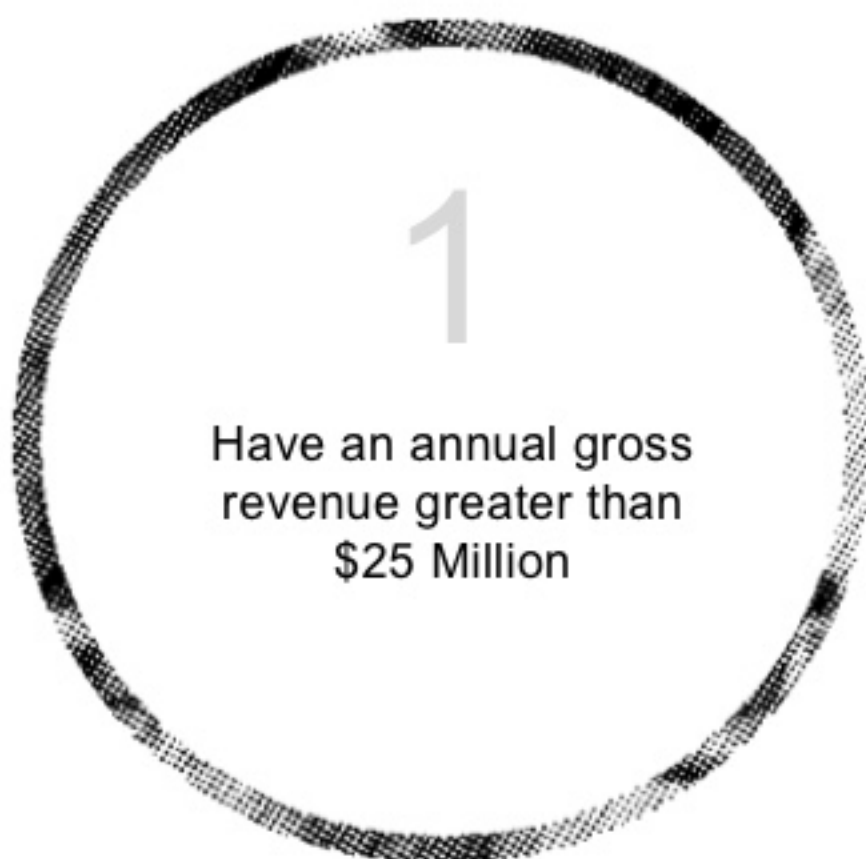
Not sure what customer information you're collecting?

Send an email to privacy@fusion92.com, and we'll help you figure it out.

IS MY COMPANY AFFECTED?



CCPA applies to for-profit companies that do business in California and meet any of the following criteria:



The price of noncompliance

There are two ways businesses can be punished for CCPA violations:

1. Individuals can bring civil action for damages up to \$750. (Though they can seek higher damages with sufficient proof.)
2. Alternatively, if the state gets involved, it can assess fines up to \$7,500 per violation. Businesses that have been charged by the state will have 30 days to address the charges or pay the fines.



COMPLIANCE

STEP 1:

AUDIT



IF YOUR BUSINESS IS AFFECTED BY CCPA, THE FIRST STEP TO COMPLIANCE IS ASSESSING YOUR POTENTIAL VULNERABILITIES. START BY ASKING YOURSELF THE FOLLOWING QUESTIONS:

1. Do you have a customer information security program with defined roles and responsibilities for documenting, disseminating and periodically updating information?
2. Do you have policies and processes to classify personal information based on level of sensitivity?
3. Do you provide training on acceptable use of customer information to all employees and contractors?
4. Do you have defined personal computer security practices for desktops, laptops, notebooks, tablets, PDAs and other mobile devices?
5. Do you have policies and procedures to protect customer data on electronic storage media, including CDs and USB drives?
6. Do you have network and communication protection policies and procedures in place?
7. Is your customer data protected from unauthorized disclosure during transmission?
8. Do you have policies and procedures in place for system and services acquisition and product acceptance?

Need help tackling this list?

Drop us a line at privacy@fusion92.com.

COMPLIANCE STEP 2: ACT



ONCE YOU'VE AUDITED AND ADDRESSED YOUR POTENTIAL VULNERABILITIES, IT'S TIME TO PUT TOGETHER A PLAN OF ACTION FOR CCPA COMPLIANCE. HERE'S A CHECKLIST TO GET STARTED:

1. Ensure you have a way to obtain parental or guardian consent for minors under 13 years of age, and the affirmative consent of minors between 13 and 16 years for data sharing purposes.
2. Offer your customers "The Right to Say No to Sale of Personal Information."
3. Provide methods for submitting data access requests, including, at a minimum, a toll-free telephone number.
4. Update privacy policies with newly required information, including a description of California residents' rights.
5. Make sure that, once a California resident opts out of providing consent for data collection, they are not presented with any further requests for consent for at least 12 months.
6. Consider whether you have California-only sites and offerings.

Achieving compliance will require a company-wide effort. Here's a sampling of the workstreams that will need attention:

- Data collection and normalization
- Marketing and media technology compliance
- Business process transformation
- Internal communications and change management
- External communications and transparency

COMPLIANCE

STEP 3:

CONSULT



Unfortunately, dealing with CCPA isn't a clear-cut undertaking. Given the complexities of how different companies collect and use consumer data, there is no "one size fits all" solution for compliance. The good news is you don't have to go it alone.

Here's what you can expect to get out of working with us.

Consulting services, including:

- An audit of your current compliance preparedness and potential vulnerabilities
- A compliance action plan and transformation roadmap tailored to your business's unique needs

A "go-to-market" internal and consumer-facing communications plan, including:

- Communications strategy
- Copywriting
- Graphic design
- Change management
- Web and email development
- Project management
- Media activation support

The road to CCPA compliance is a long one, but we can get there together.

Take the first step by sending an email to privacy@fusion92.com.