Enforcement Update & Priorities

March 8, 2024

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Deputy Director, Enforcement Division

ENFORCEMENT IN THREE PARTS

PART 1:

BUILDING AN EFFECTIVE ENFORCEMENT DIVISION

ENFORCEMENT INFRASTRUCTURE



management

PART 2:

OUR BUILDING SO FAR

STAFFING

STAFFING

Deputy
Director of
Enforcement

Assistant Chief Counsel Enforcement attorneys

Staff
Services
Manager

Research Technologist Interns Additional attorneys and support

CASE MANAGEMENT

Legal Research

Document Transfers Document Management

Attorney Training

CONSUMER COMPLAINTS

CONSUMER COMPLAINTS

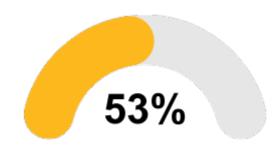
COMPLAINTS

July 6, 2023 - February 22, 2024

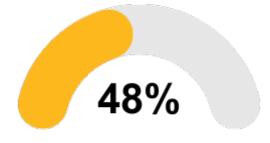


CATEGORIES OF COMPLAINTS

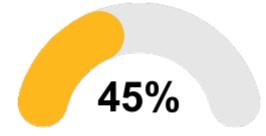
MOST COMMON



Right to delete



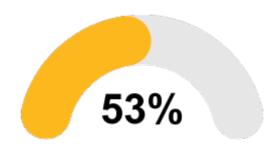
Collection, use, storing, or sharing of personal information



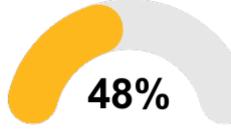
Opt-out of the sale or sharing

CATEGORIES OF COMPLAINTS

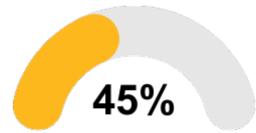
MOST COMMON



Right to delete

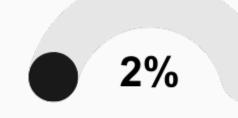


Collection, use, storing, or sharing of personal information



Opt-out of the sale or sharing

LEAST COMMON



Financial incentive or loyalty programs



Children's privacy



Right to correct



Process for complaints

Every complaint is reviewed and evaluated

Evaluation generally happens within the first week of submission

3 Response to consumer occurs later

Recurring issues

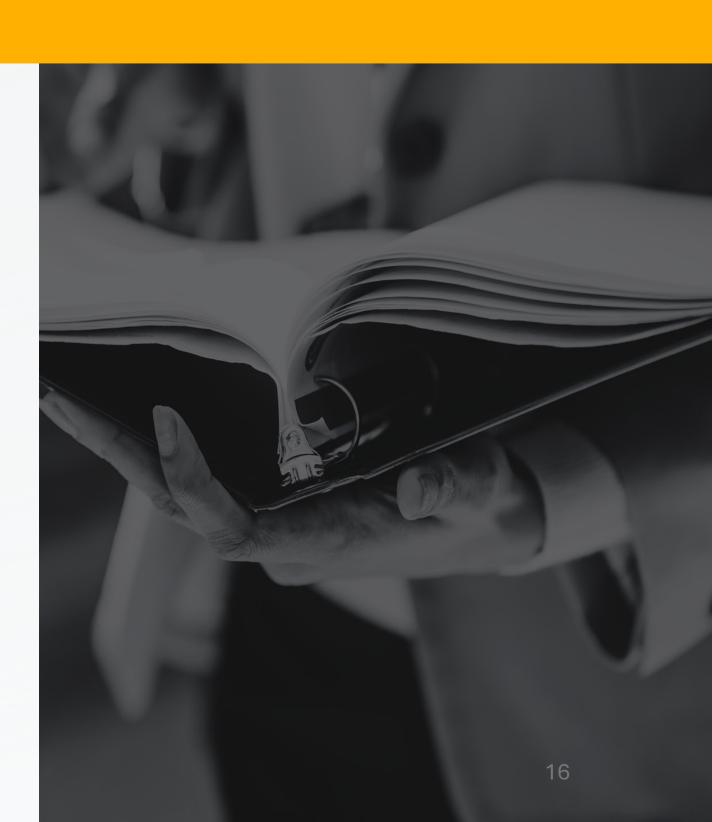
ENFORCEMENT PROCESS



Investigation Phase



Litigation Phase



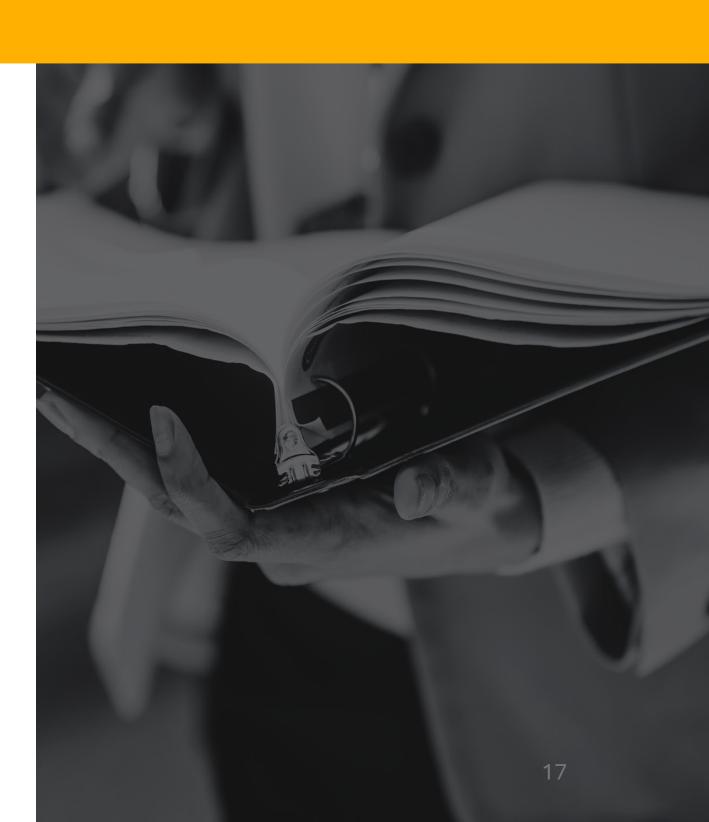
ENFORCEMENT PROCESS

Investigation Phase

Duration

Methods of engagement

Litigation Phase



INVESTIGATIONS

PART 3:

THE YEAR AHEAD

Infrastructure in the year ahead



Hiring underway for additional positions



More complex consumer complaint system



Enforcement website





Privacy notices and policies



Right to delete



Implementation of consumer requests

ENFORCEMENT ADVISORIES

- "Enforcement alert"
- "Compliance advisory"

ADDITIONAL PRIORITIES

QUESTIONS / BOARD INPUT