Enforcement Update & Priorities

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ENFORCEMENT IN THREE PARTS
PART 1:

BUILDING AN EFFECTIVE ENFORCEMENT DIVISION
ENFORCEMENT INFRASTRUCTURE

- Staffing
- Case management
- Consumer complaints
- Investigations
PART 2:

OUR BUILDING SO FAR
STAFFING

- Deputy Director of Enforcement
- Assistant Chief Counsel
- Enforcement attorneys
- Staff Services Manager
- Research Technologist Interns
- Additional attorneys and support

- Additional attorneys and support
CASE MANAGEMENT

- Legal Research
- Document Transfers
- Document Management
- Attorney Training
CONSUMER COMPLAINTS

1,208

COMPLAINTS

July 6, 2023 - February 22, 2024

83% CA RESIDENTS

17% NON-CA RESIDENTS
CATEGORIES OF COMPLAINTS

MOST COMMON

- Right to delete: 53%
- Collection, use, storing, or sharing of personal information: 48%
- Opt-out of the sale or sharing: 45%
# Categories of Complaints

## Most Common
- Right to delete: 53%
- Collection, use, storing, or sharing of personal information: 48%
- Opt-out of the sale or sharing: 45%

## Least Common
- Financial incentive or loyalty programs: 2%
- Children’s privacy: 4%
- Right to correct: 12%
Process for complaints

1. Every complaint is reviewed and evaluated

2. Evaluation generally happens within the first week of submission

3. Response to consumer occurs later
Recurring issues
ENFORCEMENT PROCESS

Investigation Phase

Litigation Phase
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
ENFORCEMENT PRIORITIES

PRIORITIES DISCUSSED IN JULY

- Privacy notices and policies
- Right to delete
- Implementation of consumer requests
ENFORCEMENT ADVISORIES

• “Enforcement alert”

• “Compliance advisory”
ADDITIONAL PRIORITIES
QUESTIONS / BOARD INPUT