

MEETING OF THE
California Privacy Protection Agency

(Pages 1 - 148)

Location: California Public Utilities Commission
Auditorium, 505 Van Ness Avenue, San Francisco, CA
94102
Date: August 7, 2026
Transcribed by: Brandon Iorlano

1 APPEARANCES:

2
3 Jennifer M. Urban - Chairperson

4 Drew Liebert - Board Member

5 Jill Hamer - Board Member

6 Nicole Ozer - Board Member

7 Tom Kemp - Executive Director

8 Phil Laird - General Counsel

9 Von Chitambira - Deputy Director of Administration

10 Megan White - Deputy Director of Public and External
11 Affairs

12 Marissa Rosemlat - Assistant Deputy Director of
13 Public and External Affairs

14 Liz Allen - Attorney

15 Kevin Sabo - Legal Division Specialist

16 Sabrina Boyson Ross - Chief Privacy Auditor

17 Maureen Mahoney - Deputy Director of Policy and
18 Legislation

PROCEEDINGS

CHAIR URBAN: Good morning. Welcome back to day two of the California Privacy Protection Agency's board meeting for August 2026. It is August 7, 2026, and thanks to everybody on Zoom for bearing with us while we sorted out some issues with the audio. This is a hybrid meeting. I'm pleased to be here in person in San Francisco with three of my fellow board members. Board Member Mactaggart may join us remotely. I welcome members of the public here in person as well as many of you joining us via Zoom.

Before we get started, a few quick and important reminders. Please make sure your microphone is muted when you are not speaking. If you're here in person, please silence your cell phone to avoid any interruptions, and I just did that myself. Please note that this meeting is being recorded. Today's meeting will follow the requirements of the Bagley-Keene Open Meeting Act as required by law. As always, the agenda and supporting materials are available here in San Francisco or on the California Privacy Protection Agency website. You may notice board members accessing laptops, phones, or other devices during

1 the meeting. We are using these devices solely to
2 access board meeting materials to facilitate our
3 understanding of the topics today.

4 After each agenda item, there will be an
5 opportunity for questions and discussion by board
6 members, and I will then invite public comment.

7 Please do note the general rules for public comment:
8 Each speaker will have three minutes per agenda item.
9 Under the Bagley-Keene Open Meeting Act, both board
10 members and members of the public must confine their
11 remarks to items that are listed on the agenda, and
12 to the specific agenda item being discussed. There
13 are two exceptions to this general rule. One is
14 specifically for the public. We have an item for
15 general public comment, which is number 13 on today's
16 agenda, titled Public Comment on Items Not on the
17 Agenda. When we discuss that item, members of the
18 public can comment on any topic, including topics not
19 on today's agenda. Board members, however, can only
20 listen and cannot respond or make comments outside of
21 the agenda. The second exception is for both the
22 Board and the public: If you have a suggestion for a
23 topic the board should consider at a future meeting,
24 you can bring that up during Agenda Item Number 14
25 today, which is designated for proposing future

1 agenda items. The Board can't discuss these items,
2 but we can consider them for a future agenda.

3 As far as the logistics of public
4 comment: First, if I happen to forget to call for
5 public comment, please raise your hand on Zoom or
6 wave your hand here in the room, and the moderator
7 will get my attention and make sure you are
8 recognized. If you are participating via Zoom and
9 wish to speak, please wait until I call for public
10 comment and use the raised-hand feature. If you're
11 using the application, it's under the reactions
12 feature at the bottom of your Zoom screen. If you
13 are joining by phone, press star-nine to raise your
14 hand and show the moderator you would like to speak.

15 Please note that the board cannot see
16 Zoom participants and will only be able to hear your
17 voice. If you'd like, you may identify yourself when
18 speaking. This is optional, and you can use a
19 pseudonym when logging in via Zoom as well. Our
20 moderator will call your name when it is your turn
21 and request that you unmute yourself for comment.
22 Those using the webinar can use the unmute feature,
23 and those dialing in by phone can use star-six to
24 unmute. When your comment is completed, the
25 moderator will mute you.

1 If you're here in person and would like
2 to comment on an item, please wait for the public
3 comment period to be announced and proceed to the
4 podium here in the room and form a line. I will call
5 on you in turn. When called, speak clearly and
6 directly into the microphone so remote participants
7 can hear you and your remarks can be included in the
8 meeting record. As with the Zoom attendees, it's
9 helpful if you identify yourself, but again this is
10 entirely voluntary.

11 We are committed to providing as much
12 accessibility to the public as possible, and using
13 the hybrid format -- as we've already experienced
14 today with the audio -- does create some technical
15 complexities. So thank you for bearing with us
16 earlier, and please do bear with us if we experience
17 additional technical issues. If we do, we'll pause
18 the meeting to fix those issues. If you're attending
19 remotely and experience technical issues, please
20 email info@cppa.ca.gov. That's India, November,
21 Foxtrot, Oscar, at CPPA for California Privacy
22 Protection Agency dot CA dot gov. That inbox is
23 monitored during the meeting; if anything comes up,
24 we will pause to fix it. We will take breaks today
25 as needed, including one for lunch. I will announce

1 each break and when we plan to return, or at least
2 how long we will at least be away, so members of the
3 public can leave and come back.

4 Our location today in San Francisco is
5 the California Public Utilities Commission. We
6 greatly appreciate the CPUC team for their
7 hospitality and their expert work on the technical
8 side of today's meeting. My many thanks to the board
9 members for their service and everyone helping to
10 make today's meeting possible. We have a long line
11 of expert deputies and other folks who will be
12 briefing us today, and my thanks to them. Special
13 thanks to Executive Director Tom Kemp and General
14 Counsel Philip Laird. I'd like to thank and more
15 officially welcome our moderator, Ms. Serena Carwile,
16 and ask her to please conduct the roll call.

17 MS. CARWILE: All right. Board Member
18 Hamer?

19 MS. HAMER: Present.

20 MS. CARWILE: Board Member Liebert?

21 MR. LIEBERT: Present.

22 MS. CARWILE: Board Member Mactaggart?
23 Board Member Ozer?

24 MS. OZER: Present.

25 MS. CARWILE: Chair Urban?

1 CHAIR URBAN: Present.

2 MS. CARWILE: Madam Chair, you have four
3 present members and one absent.

4 CHAIR URBAN: Thank you, Ms. Carwile.
5 The Board has established a quorum. I would like to
6 let board members know we'll take a roll call vote on
7 any action items today.

8 With that, we will turn to Agenda Item
9 Number 6, which is our annual administrative update,
10 including a plan for upcoming budget development.
11 And that will be presented by Ms. Von Chitambira,
12 who's our deputy director of administration.

13 And Ms. Chitambira, please do go ahead.

14 MS. CHITAMBIRA: Good morning Chair Urban
15 and members of the Board. Today, I'll be presenting
16 the administrative and budget update, as well as
17 additional updates on the current fiscal year. The
18 agenda includes updates on our procurement,
19 facilities, organizational updates, as well as
20 planning for the next budget cycle.

21 Beginning with our budget and staffing.
22 This is a reminder, our current fiscal year runs from
23 July 1, 2026, to June 30, 2027. This fiscal year, as
24 in the past few years, we successfully secured
25 approval for all our budget change proposals or BCPs.

1 This is a significant accomplishment. A BCP is not
2 simply an internal request. It undergoes extensive
3 review and justification through multiple levels of
4 scrutiny before it is approved. Each proposal must
5 be thoroughly developed and vetted within the Agency,
6 supported with strong data and business
7 justification, then reviewed by the Department Of
8 Finance before it is given to the legislature for
9 review. And that includes consideration by both the
10 assembly and the Senate before it is ultimately
11 included in the final budget. Our team's diligence
12 in preparing well documented and supported BCPs of
13 high quality has been instrumental in ensuring that
14 our budget continues to increase as our workload is
15 increasing.

16 I'm pleased to share that our current
17 fiscal year, the budget is 19.7 million. The
18 approved budget includes nine positions to support
19 the Agency's workload. Six of these positions are
20 dedicated to enforcement. Over the past year, the
21 Board and executive leadership have expressed
22 importance of continuing to invest in enforcement
23 resources. We followed suit and requested resources,
24 and those were given to the Agency. Again, these are
25 not the final positions that we need for enforcement.

1 Will continue to request additional positions as a
2 phased -- in a phased approach.

3 We also received a position for
4 procurement. As you know, our contracts request have
5 continued to get more complex as the Agency is
6 growing. And so we needed to find a dedicated
7 resource to help us with ensuring that our
8 procurements are well justified and we have the level
9 of expertise necessary to ensure we get the resources
10 we need through procurement. It also includes two
11 positions for Drop. All of these nine positions were
12 effective July 1st and recruitment is well underway.
13 Some positions have already been accepted, and
14 onboarding is currently ongoing. The remaining
15 positions are expected to be filled in the coming
16 weeks out of the new positions.

17 With these new additions to the
18 workforce, the Agency now has 63 authorized
19 positions. In addition to the authorized and civil
20 service position, we also continue to leverage
21 interns, and these provide valuable support for the
22 Agency as they serve as a pipeline for more
23 competitive candidates when permanent positions open
24 up.

25 This slide shows a snapshot of our funds

1 that we have that make up the 19.7 million. We have
2 three funds that the Agency oversees: The General
3 Fund, at 12.6 million, this is the largest fund for
4 the Agency, and it also supports 50 positions. The
5 Data Broker Registry Fund is at 5.7 million or 29% of
6 our budget, and it's supporting nine positions. And
7 the Consumer Privacy Fund has approximately 1.3
8 million or 7% of the budget, and has four positions.

9 And now here's the comparison from the
10 prior fiscal year. The General Fund increase is
11 minimal, and that is supporting the one position that
12 we received in procurement and other technical
13 adjustments. The Data Broker Registered Fund
14 increased the most with 1.9 million, and the consumer
15 privacy fund increased by 928,000. Altogether the
16 increase was \$3 million from the prior year.

17 And this is more of an administrative
18 milestone for the Agency. When the Agency was
19 established, our administrative structure was
20 initially under Business, Consumer Services, and
21 Housing Agency. And that is primarily because of the
22 support they provided when the Agency was being
23 formed. And so with BCSH's recent restructuring, the
24 Agency was established as its own independent unit.
25 We've always been independent, but when you looked at

1 the budget, it looked like we were under BCSH. And
2 so with the new change, it'll be clear when you look
3 at the budget -- the state budget to see that CPPA is
4 independent. Implementing this change required a lot
5 of changes across many financial records, payroll, HR
6 systems, and other administrative documents. And
7 these updates were effective July 1st. So the Agency
8 will now show up as business unit 8615, from 1703 in
9 prior years. And I just want to recognize our
10 administrative team along with our partners at the
11 Department of Finance, Department of General
12 Services, and fiscal for helping us through this
13 transition.

14 Moving on to procurement. With the new
15 position that we received for procurement, the Agency
16 will continue work to document processes and
17 procedures, which is necessary for us to be able to
18 transition procurement in house. With our increase
19 in workload, it's now important that we have more
20 capacity internally to be able to complete our
21 procurement more timely and efficiently. By moving
22 procurement in-house, we expect our responsiveness to
23 be more improved. It'll reduce contract processing
24 timelines and just have greater flexibility and
25 oversight in terms of our contracts and procurement.

1 Our goal is to be able to obtain independent
2 purchasing authority, and the timeline depends on
3 different external factors and processes, but we're
4 working diligently to make this milestone happen.
5 It'll potentially be a multi-year process, but we
6 have begun working on the process now.

7 And then moving to facility. I'm pleased
8 to share some exciting updates on our facilities.
9 Construction of our new Sacramento headquarters is
10 nearing completion, and we expect to move in this
11 fall. The new office provides a permanent home and
12 additional space to support our growing workforce.
13 For those outside of Sacramento, we'll continue
14 leasing space from Department of Financial Protection
15 and Innovation in Los Angeles and San Francisco.
16 This approach of subleasing remains cost-effective
17 and operationally effective for the Agency as the
18 Agency continues to grow. Staff look forward to
19 welcoming the Board, as well as all our team, to the
20 new Sacramento office in the months ahead.

21 As part of organizational updates, as we
22 have received new positions, we have been really good
23 about succession planning within the Agency. And so
24 some of the new positions have resulted in existing
25 staff moving up as they get promotions into the new

1 positions. And that also means we have to start
2 backfilling the positions that they have left. So
3 we're continuing with our recruitment efforts and
4 continuing to strengthen our operational structure to
5 support the Agency's mission.

6 Even though we've only begun this new
7 fiscal year, planning for the next budget cycle is
8 already underway, and our primary focus will be
9 expanding operational support within HR, IT, and
10 legal, as well as the audit team. As the audit team
11 is being filled up, we'll need to have more
12 operational support for them, so those resources will
13 be included in the next request. So for the '27/'28
14 budget, we plan to request positions for the Audits
15 Division to develop the team. When the Agency was
16 created, we had minimal positions dedicated to
17 audits, and the plan was to request positions once we
18 had enough data to be able to determine the resources
19 needed. And so we're now at a point where we are
20 prepared to start asking for those positions for
21 audits. And as the team grows, we also need to make
22 sure we have support for the Audits Division and the
23 Agency as a whole, so looking at HR resources, as
24 well as legal resources.

25 Drop will also require additional

1 support. So maintenance and operations for ongoing
2 Drop activities will be part of the priorities for
3 the next fiscal year. And then we'll begin scoping
4 for the grant program. The grant program is a
5 secretary requirement for the Agency to have. And so
6 before we can run the program, we need to have the
7 infrastructure developed. And so the results we're
8 asking for will be for developing the infrastructure,
9 so we can start running the grant program in future
10 years.

11 So in summary, I've shared highlights of
12 our current fiscal year budget, the status of
13 procurement and facilities, and the next steps in our
14 upcoming budget process. Thank you for your
15 continuing guidance to the board members, and we're
16 happy to answer any questions. I have the chief
17 deputy here with me to assist with any questions you
18 might have.

19 CHAIR URBAN: Thank you very much,
20 Ms. Chitambira. And thank you for the tour de force
21 of a tour through what I know is a tremendously
22 complex landscape and making it straightforward for
23 us. I want to thank you and your staff for the
24 expertise in the highly professional approach that
25 you've taken to developing our BCPs and working with

1 our control agencies and the legislature so
2 effectively. The team's success is testament skill
3 and care. And of course, we cannot do our work
4 without the resources. It's simply the keystone to
5 the work. So I really want to thank and commend you
6 and your staff for that.

7 I do want to pause to say a very sincere
8 thanks to BCSH agency, now BCSA, who took us under
9 their wing when they did not have to and made us
10 exist. And it is very exciting to hear about the
11 transition to our independent status in state
12 systems. It's a true milestone that may not be as
13 visible to the public, but it is critical to the
14 Agency's matured work and continued development. I
15 only have a small sense of the complexity involved
16 here, but even that is daunting. I remember talking
17 to Deputy Executive Director Garcia before we
18 existed, and we -- she got us into CalFisc, which was
19 Cal Fiscal, which is a really big deal. And so we
20 were like starting out well, but we still didn't
21 exist in like many, many, many systems and for many
22 control agencies. And to be able now to stand on our
23 own feet is a very big milestone.

24 So thank you, Ms. Chitambira and to all
25 of your wonderful staff. And of course, it's

1 extremely exciting news about the space. Can't wait
2 to see it. Another very complex set of jobs involved
3 in that. So thank you for everything that you all
4 have done in the past year and planning for this
5 coming year.

6 Further comments and questions from the
7 Board? I know Ms. Hamer would like to talk.

8 MS. HAMER: Thank you for that great
9 presentation and for the work -- a lot of work behind
10 it. I was just wondering if there was consideration
11 given to expanding the enforcement budget or
12 resources.

13 MS. CHITAMBIRA: Sure. Absolutely. That
14 is also on the table. We're currently evaluating the
15 revenues in the Consumer Privacy Fund, as well as the
16 Data Broker Registry Fund related to that. So yes.
17 Thank you.

18 MS. HAMER: Thank you.

19 CHAIR URBAN: Other comments, questions
20 from board members?

21 All right. Well, that brings us to a
22 highly bittersweet moment. Ms. Chitambira has
23 created this agency and built this agency and given
24 us her incredible expertise, dedication, and
25 creativity as the second employee of this agency.

1 And she is going to graduate school. So she is
2 leaving after 20 years service in state government,
3 for which all of California, whether they know it or
4 not, is very grateful. And we certainly are
5 knowingly very grateful.

6 I want to say that when the Executive
7 Director -- who was about a month into the job -- and
8 I were looking at applications for the Deputy for
9 Administration, Ms. Chitambira's application was just
10 stellar and clearly at the very top. And when I
11 called her references, I was told she's "the A-team."
12 And she has been living out that prophecy since she
13 joined the Agency. When she arrived, it was
14 instantly a massive relief to employee number one,
15 the ED, and to me personally. We were doing our very
16 best with an exceptionally complex administrative and
17 management situation with the State. And her
18 expertise, her ability to creatively solve problems,
19 her calm, and her skill were both exactly what we
20 needed and in no way what we could expect. We
21 were -- we've been very fortunate. It must be one of
22 the biggest challenges in state service to start a
23 new agency, and that's if for no other reason than it
24 is one of the rarest. Standing up an entire new
25 state agency is not something that happens every day.

1 There's not a book that you can take off a shelf.
2 There's not a shelf of books that you can go through.
3 It requires incredible existing understanding of
4 state systems, existing expertise, and it requires
5 the ability to think beyond that expertise and
6 understanding, to come up with new ideas about how to
7 do it, and then just absolute dedication and
8 continued effort. And that is absolutely what you
9 can see today in the form of the Agency, from Ms.
10 Chitambira's work.

11 It's not one of the most complex things
12 to do only because of the fact that it's a rare
13 opportunity in general, but it is for this agency
14 particularly complex, because of the complexity of
15 our mission. Because of the fact that we are the
16 first dedicated privacy regulator in the country.
17 Because we had statutory deadlines in the initiative
18 that didn't necessarily fully take into account all
19 the rest of that complexity, and which required the
20 Agency to gain capacities and set up functions and
21 processes in the state on a very rapid basis. So not
22 only did Ms. Chitambira do that with aplomb and with
23 skill, and in a way that sets us up for success and
24 with a solid foundation as she goes on to new
25 adventures, but she developed -- in this brand-new

1 agency -- an award-winning department. We have very
2 high operational standards and received a state
3 recognition award last year for the Agency's
4 exemplary work in procurement with small businesses
5 and disabled veterans' businesses. So even within
6 the building, they have been able to go beyond
7 expectations.

8 This is down to her skill, her
9 thoughtfulness, her intense focus, which is somehow
10 combined with a really impressive chill. That --
11 now, that's rare. That's rare to see that
12 combination. And we are going to miss you
13 tremendously, Ms. Chitambira. We -- I cannot express
14 deeply enough my gratitude for what your work and
15 your presence has represented to this agency and to
16 the people of California. And so I would like to
17 introduce a resolution of recognition, which I
18 believe Ms. Garcia has for us. But I will read it
19 out so the Board can consider it.

20 State of California Privacy Protection
21 Agency, resolution in recognition and appreciation of
22 distinguished service by Vangai Chitambira. Whereas
23 for two decades, Vangai Chitambira has served the
24 people of California with exceptional
25 professionalism, integrity, and unwavering commitment

1 to public service. And whereas through these 20
2 years, Ms. Chitambira has consistently exemplified
3 the highest standards of state service, bringing
4 skill, steadiness, compassion, and deep institutional
5 knowledge to every role undertaken. And whereas, as
6 the second employee of the California Privacy
7 Protection Agency, Ms. Chitambira played an
8 indispensable role in standing up a brand new agency,
9 building processes from the ground up, shaping early
10 operations, and ensuring that critical functions were
11 ready to serve Californians from day one. And
12 whereas Ms. Chitambira's thoughtful leadership,
13 resilience, and willingness to take on any challenge
14 lay the groundwork for the Agency's growth, culture,
15 and effectiveness, leaving a lasting legacy that will
16 continue to benefit Californians for years to come.
17 And whereas the Agency's progress, stability, and
18 early successes are a direct reflection of
19 Ms. Chitambira's tireless work, sound judgment, and
20 genuine dedication to advancing privacy rights in
21 California.

22 Therefore, be it resolved that we, the
23 California Privacy Protection Agency Board extend our
24 heartfelt appreciation for Vangai Chitambira's
25 distinguished service to the State of California. Be

1 it further proclaimed that we offer our heartfelt
2 thanks and warmest wishes to her as she departs state
3 service, acknowledging her legacy, celebrating her
4 achievement, and expressing profound gratitude for
5 the foundation she has built. In recognition of a
6 career marked by excellent service and commitment, we
7 honor and commend Vangai Chitambira for all she has
8 given to the people of California.

9 Any comments from the Board? Or may I
10 have a motion to --

11 MS. HAMER: So moved.

12 CHAIR URBAN: Thank you. I have a motion
13 to adopt the resolution as stated. May I have a
14 second?

15 MS. OZER: Yes, we're all moved.

16 CHAIR URBAN: I have a motion and a
17 second.

18 Ms. Carwile, could you check to see if
19 there's public comments on this item?

20 MS. CARWILE: Yes. This is for Agenda
21 Item Number 6, Annual Administrative Update Including
22 Plans for Upcoming Budget Development. If you'd like
23 to make a comment at this time, please raise your
24 hand using the raised-hand feature or by pressing
25 star-nine if you're joining us by phone. This is for

1 Agenda Item Number 6.

2 Madam Chair, I'm not seeing any hands
3 raised at this time.

4 CHAIR URBAN: Thank you very much,
5 Ms. Carwile. With that, there's a motion on the
6 table and a second. And Ms. Carwile, would you
7 conduct the roll call vote?

8 MS. CARWILE: Yes.

9 Board Member Hamer?

10 MS. HAMER: Wholeheartedly, aye.

11 MS. CARWILE: Board Member Liebert?

12 MR. LIEBERT: Equally enthusiastic aye.

13 MS. CARWILE: Board Member Mactaggart?

14 Board Member Ozer?

15 MS. OZER: Aye.

16 MS. CARWILE: Chair Urban.

17 CHAIR URBAN: Five times however many
18 times one can do that.

19 MS. CARWILE: Madam Chair, you have four
20 enthusiastic yeses and one not voting.

21 CHAIR URBAN: Thank you very much, Ms.
22 Carwile, the motion carries by a vote of four to
23 zero.

24 Ms. Chitambira, this is entirely
25 optional. Excuse me, Chitambira. Would you like to

1 say anything?

2 MS. CHITAMBIRA: Yes. Thank you. Thank
3 you for this honor. It's been a great opportunity
4 working for this agency. And thank you for taking
5 the risk with me. Thank you to the board members.
6 Tiffany, she was part of the interview panel. And
7 taking this job for me allowed me to do what I'd like
8 to do best, working with a lot of ambiguity and just
9 figuring out how to build something. And I got to do
10 that. And it was the best time of my life. This job
11 has given me the strength and empowerment to continue
12 to stretch myself and want to do more.

13 And I'm really proud of everything we've
14 done. But most importantly for me is the people and
15 the culture that we have, that everyone who comes
16 here wants to work hard and do the best. And they've
17 been able to do that. It feels like home. And I
18 feel like I'm leaving home to go and try something
19 new. And I'm confident that everything we've built
20 is just going to continue to grow because we're good
21 at what we do, including succession planning. So
22 even if I leave, I know it's going to be great.

23 So again, I just want to thank you, and I
24 wish all the best to everyone, and most importantly,
25 the admin team. They are everything to me. And of

1 course, the leadership, Executive Director Tom, the
2 executive team, Serena, everyone. I'm not going to
3 mention everyone, but you all know you mean a lot to
4 me. I don't get to sit in on as many interviews
5 anymore, but I get to see every single name that
6 comes in. And it's been amazing to see the level of
7 talent that we have and just how we've been able to
8 retain it. We bring in people, and we keep them here
9 because it's an amazing place to work. So thank you
10 to the Board for making that possible and to the
11 leadership team as a whole. Thank you.

12 CHAIR URBAN: Thank you, Ms. Chitambira.
13 We are going to take a short break in order to
14 facilitate the signing of the resolution, and we will
15 be back within ten minutes. Thank you.

16 (Whereupon, a short recess was
17 taken.)

18 CHAIR URBAN: Welcome back. We are now
19 back from our brief break, and we'll continue with
20 Agenda Item Number 7. Agenda Item Number 7 is our
21 annual public affairs update, and it'll be presented
22 by Ms. Megan white, our deputy director for public
23 and external affairs. This is our annual regularized
24 public affairs update. The CCPA charges the Agency
25 with a number of responsibilities. And among those

1 are three main functions, implementing the statute
2 through regulations, enforcing the statute, and
3 promoting public awareness of consumer privacy
4 rights, and business responsibilities. The Board has
5 been very eager to support the public and businesses
6 through this function in the Agency's inception.
7 We've heard from Ms. White and her team about her
8 team's energetic and effective efforts regularly over
9 the last few board meetings. And this builds on
10 those with the annual report and looking forward. So
11 I'm very much looking forward to this.

12 And with that, I will ask you to please
13 go ahead, Ms. White.

14 MS. WHITE: Wonderful. Thank you so
15 much, Chair Urban. Making sure that the audio
16 worked. Perfect. Okay. And thank you, members of
17 the Board.

18 On behalf of the public affairs team, I'm
19 pleased to present the annual public and external
20 affairs update. As you may remember, I've had the
21 opportunity to provide updates to the board on our
22 DROP outreach efforts in both September 2025 and also
23 February 2026, as Chair Urban mentioned. However,
24 the last time I presented a division-wide update was
25 May 2025, so I just wanted to set the groundwork

1 there. So today I'll be providing major program
2 areas within the division that I oversee. This of
3 course includes the paid ad campaign and DROP, but
4 also an update on our outreach and partnership
5 growth, media relations efforts, various educational
6 materials we have added to our website and use in our
7 outreach efforts, and an update on our internal comms
8 efforts.

9 So last summer, we ended phase one of our
10 paid ad campaign. As you may remember, this campaign
11 was called Exercise Your Rights, and it focused on
12 informing Californians that they have privacy rights.
13 Then we moved on to phase two, which focuses on why
14 these rights matter. This ad campaign is called
15 Protect What Matters, and you're seeing the images
16 right there on the slide. These ads primarily ran
17 from July 2025 through February of 2026. While these
18 ads didn't end in February, they were only in light
19 rotation until all advertising concluded in June of
20 this year. Over that time, the campaign garnered
21 144.4 million impressions. The click-through rate
22 performed nearly twice as well as our previous
23 campaign, Exercise Your Rights. For Protect What
24 Matters, we had a 1.44% click-through rate, versus a
25 0.7% click-through rate for Exercise Your Rights.

1 Paid work -- paid search did exceptionally well
2 there. We had an 18.9% click-through rate, well
3 above the benchmark that's only at 3.1%. So that's
4 significantly higher than the benchmark. We used
5 various tactics, which are listed on this slide,
6 including radio, streaming, online, and out of home.

7 Shifting gears to the DROP ad campaign.
8 Ads for this campaign only ran in 2026. They started
9 July 1 and ran through the end of the media buy
10 contract in late June. This campaign we called
11 Gatherers, because it focused on explaining DROP in
12 an eye-catching and engaging way. This was also the
13 first time we introduced our nickname, Cal Privacy,
14 in a paid ad. Tactics included paid search, paid
15 social media, radio, streaming, podcasts, display
16 ads, video, and out of home, and print ads. Over the
17 span of the campaign, it received more than 350
18 million impressions. That's 2.4 times higher than
19 Protect What Matters, in less than six months. For
20 this campaign, paid search had a 44.47% click-through
21 rate. That's a thousand percent above the standard
22 benchmark of 4.41.

23 So of course, we asked the question that
24 I'm sure you all are wondering. Other than these
25 being really fun and engaging ads, why did this

1 perform so well? And they said they believed it
2 reflects high consumer interest, and that
3 Californians are looking for guidance on data privacy
4 from someone they can trust. So it makes sense.

5 Moving on to our survey. And so on the
6 topics of insights learned as part of our creative
7 and ad-buy campaign, we conducted a paid survey in
8 late spring of this year. The focus, as was the case
9 with the survey conducted in 2024, was to better
10 understand how familiar Californians are with their
11 privacy rights, and how they feel about exercising
12 those rights, and also to gauge awareness of the
13 Agency. The survey we just completed in June 2026
14 has improvements in the sample size when compared to
15 the survey done in 2024. In 2024, we surveyed 500
16 people. In 2026, we grew that survey to a sample
17 size of a thousand. The larger sample size provides
18 statistical precision, reduces sampling error, and
19 provides more stable estimates across California's
20 diverse population. I've included a few notable
21 stats on the slides you see here. In addition, the
22 survey provided findings that will help guide future
23 communication and outreach efforts.

24 A few additional notable findings, in
25 addition to what you're seeing on the screen. When

1 asked why are you concerned about companies
2 collecting your personal information, the top concern
3 is they won't keep it safe from hackers, at 59%,
4 followed by they will sell it to other businesses, at
5 31%, and will use it to discriminate against me, at
6 21%. Awareness of privacy rights is growing, but
7 there's room for improvement and clarity. For
8 example, 66% of Californians surveyed correctly
9 identified their privacy rights. Now that's really
10 great. That's quite exciting and encouraging.
11 Another important stat is that government sites are
12 the top place people go to look for privacy
13 information, at 64%. So it's making sense why our
14 ads are performing so well, followed by dot-org, at
15 43%, and looking for articles or videos, at 37%.

16 The research team said the most
17 remarkable data point was that among Californians who
18 are familiar with Cal Privacy, 82% viewed the Agency
19 positively. That's very rare, exceptionally high for
20 a government agency. But of those totaled surveyed,
21 only 20% had heard of Cal Privacy. So the Agency
22 does not have a reputational problem, but we do have
23 a reach problem. And based on this, from a branding
24 perspective, we have two strong goals to work
25 towards: Keeping our favorability as strong as it is

1 now, if not improving it, and increasing our reach.

2 Moving on to the launch of DROP. Because
3 one way we have continued to grow our reach is
4 through the launch and promotion of DROP. Before the
5 launch, and throughout 2025, we were deeply focused
6 on the planning efforts. This includes all the
7 things that you see on this slide, a user-friendly
8 DROP website that's easy to understand and in plain
9 language, outreach materials in more than 11
10 languages, available in both hard copy and on our
11 website, and various social media campaigns. But it
12 also includes a lot of work that you don't see on
13 this slide, things such as meeting with more than a
14 dozen community leaders throughout the state. These
15 meetings were incredibly valuable, because we learned
16 about the issues their organizations are working to
17 address and the communities that they served. Then
18 we discussed ways that we can partner at low lift and
19 low cost to both groups. For example, one nonprofit
20 included our DROP flyer in their weekly food boxes
21 that they distribute to families in need of food
22 assistance. Numerous nonprofits let us know about
23 community events they're hosting and let us have free
24 booth space there.

25 So we've definitely had a lot of

1 opportunity to reach the public through nonprofits,
2 but then we also had the opportunity to take the show
3 on the road, if you will, and do our DROP outreach
4 road show. This targeted outreach effort lasted from
5 April to June of this year. In total, we attended 13
6 events during a three-month period. We crisscrossed
7 the state, attending various events and making stops
8 at places like the Fresno Farmers Market and the
9 Vista Strawberry Festival. In addition, we use these
10 events as media opportunities. So prior to each
11 event, we'd pitch the media and share that the Cal
12 Privacy booth was going to be at the event, and
13 encouraged them to show up. This resulted in
14 significant reach beyond just the people we met at
15 the events. DROP was featured on numerous local TV
16 and radio stations, and in total we were featured on
17 84 media markets, including radio and TV. That's a
18 total reach of 490 million people. In addition, we
19 had our DROP road show booth at the DROP press
20 conference hosted with Senator Becker's office at the
21 state capitol in March of 2026, and we also partnered
22 with the Office of Community Partnership and
23 Strategic Communications to host two virtual ethnic
24 community forums for ethnic media in May of this
25 year. One forum was in English, and it was

1 translated into six different languages. The other
2 forum was strictly in Spanish. This resulted in a
3 lot of coverage spanning the state, including LA, the
4 Central Valley, Bay Area, Sacramento, and even
5 national outlets.

6 Zooming out to all the outreach efforts
7 of the Agency. Our agency has partnered with more
8 than 40 community events since my last update. For
9 clarity, this number is separate from those 13 DROP
10 road shows. This includes speaking at events like
11 Senior Scam Stoppers and tabling at events. We also
12 participated in more than 50 speaking events. This
13 includes speaking at professional conferences,
14 including conferences for the privacy, advertising,
15 tech, and legal industries.

16 Moving on to news coverage, specifically
17 news coverage of DROP, which has been significant
18 since December of 2025. We've been covered by
19 hundreds of news outlets, mainstream media, including
20 KTLA, ABC7 in the Bay Area, CBS8 in San Diego, ABC30
21 in Fresno, and that's just to name a few. When DROP
22 is featured on news segments, we experience a jump in
23 signups, so we will continue to pursue these
24 opportunities. They're very low cost with high
25 impact.

1 Moving on to educational materials.
2 Another large focus for our division has been
3 increasing the amount of educational materials and
4 resources our agency provides to the public. One of
5 the things we always focus on when developing
6 marketing materials is making privacy easier for
7 Californians. That means that plain language is key.
8 And although the feel of educational materials will
9 shift based on the message and the target audience,
10 the plain language remains a core tenet.

11 On this slide you'll see a range of
12 materials for various audiences. So we have our DROP
13 toolkit, which is on our privacy website. It has
14 that really fun and playful feel. The toolkit's
15 meant to be easy to share news about DROP. We make
16 it easy for nonprofits. They can just put copy right
17 into their newsletters about how to sign up for DROP.
18 And we even created social media images and text that
19 people want to share. And all these images and
20 materials are available in English and in Spanish.

21 We also have information for more
22 specific audiences, such as business guidance, which
23 we developed in partnership with the legal team, and
24 we have our annual report, which comes out at the
25 first quarter of every year, and information for

1 specific groups, such as privacy tips for older
2 Californians, that you see here. This flyer was
3 developed in partnership with the California
4 Department of Aging. It's been very well received at
5 our Senior Scam Stopper presentations. In addition,
6 we printed brochures in Braille, and quite a few
7 nonprofits have requested them for clients and
8 thanked us for providing such a valuable and rare
9 resource. This is something we might not have
10 thought of; however, it was brought to our attention
11 by one of the nonprofits that we talked to during the
12 meetings earlier this year. So those are just so
13 valuable. We continue to have those conversations,
14 and we're so grateful for their time and the
15 learnings that we've gotten from these partners.

16 Moving on. Speaking of learning, there
17 are numerous learning styles, so we provide
18 information in various ways. One example is, when
19 explaining something somewhat uncommon, like a mobile
20 advertising ID, or MAID, we don't just have a web
21 page or a blog post to explain it. We also develop a
22 video about MAID, which is on our website, and we
23 promote it on social media channels. We have that
24 video not only in English but we have it in Spanish
25 as well. I'd like to play a small sample for you,

1 just a little more than 30 seconds.

2 (Video plays.)

3 Just wanted to give you a little taste
4 for that. If you want to watch more, please go to
5 our website. And if that voice sounds familiar, it's
6 our very own Ms. Naylor. That's just one of the
7 videos we have like this on our website that explains
8 privacy concerns. We also have one coming on
9 personal information versus sensitive personal
10 information, and we also have one overviewing
11 California's privacy rights. We developed these
12 videos under the creative contract, the contract that
13 just ended. We developed these videos as part of
14 that contract, and we're holding on to them and just
15 piecemealing them out so we can keep the content
16 fresh and interesting.

17 Additionally, the easy-to-use nature of
18 the privacy website, along with the videos and the
19 clear content, has helped drive website traffic
20 growth. So as you can see, improving privacy.ca.gov
21 has been another strong focus for our division over
22 the past year, and it is paying off. Looking
23 specifically at engagement since January 1st, 2026,
24 we've had 2.5 million active users. Just to go back
25 to the data on the website, 2.5 million active users,

1 from January 1st to August 2nd, 2026. In all of
2 2025, we had 639,000 active users. So that's an
3 increase of 291%. Quite impressive. In terms of
4 visits and sessions, we've had 3.1 million from
5 January 1st until August 2nd. For comparison, in all
6 of 2025 we had 747,000 sessions. So that's an
7 increase of 315%. Significant.

8 On to social media. At the same time we
9 are adding to our website, we also continue to grow
10 our audience and engagement on social media. We've
11 been adding more video content to our posts, and we
12 continue to maintain our current social media
13 channels and also recently added TikTok. So far we
14 have had a few videos up, and we'll continue to
15 develop more content for that specific platform.
16 Also, we've done a few engaging campaigns on social
17 media, including our most recent campaign, which uses
18 games and features animals from our Gatherers
19 campaign to encourage people to learn more about
20 their privacy rights.

21 And finally, shifting to internal comms.
22 A strong internal comms program helps communication
23 and culture that Von's team works so hard to build --
24 and we all do, the whole executive team of an
25 organization. Our division gets to handle the

1 internal comms efforts. This includes our monthly
2 Cal Privacy Insights webinars, where staff or outside
3 guests come and present on various topics. We also
4 create the Cal Privacy Update newsletter. And I know
5 that Tom touched on this briefly. We have a
6 newsletter for the external audience that people can
7 sign up for; this is just for internal, for our
8 internal team. And that newsletter is sent to staff
9 the first day of the month, so everyone can receive
10 agency news right to their inbox. We also created
11 and lead the Engagement Committee, which is a
12 staff-run internal committee that meets quarterly to
13 discuss internal communication efforts. And in
14 addition we provide resources to staff to align with
15 the Cal Privacy brand, including a style guide,
16 templates, design assistance, and much more.

17 So what's coming up? Consumer education
18 does take time, as everybody here knows. We aren't
19 transactional. Trust is strategic, and that means
20 ongoing outreach efforts throughout the rest of 2026.
21 We will continue to think of fun and creative ways to
22 encourage Californians to sign up for DROP. This
23 includes a Delete Week, which is currently in the
24 works. It's planned for October. We will be
25 partnering with Senator Becker's office on this

1 effort. The plans are shaping up now, and we will
2 have an engaging, fun week of content on our social
3 media channels and much more, to celebrate
4 Californians' right to delete. We'll also encourage
5 the media to help us spread the word. So more news
6 coming there, but it is in the works, currently
7 scheduled for around October 12th. So just so you
8 have a reference of when we're looking at in October.
9 And then with the Opt Me Out Act going into effect
10 January 1 of 2027, plans are already underway on fun
11 and creative ways to engage the public on this new
12 right. We'll ramp up outreach and education in the
13 fall and winter of 2026, and then of course through
14 the new year, and we'll come with more direct
15 information as the law comes into effect.

16 Also, we'll share the great news about
17 the Agency through our external quarterly newsletter.
18 So we got a few newsletters. I just wanted to keep
19 it straight. Now this one is our external quarterly
20 newsletter. It's going to be starting later this
21 year. So people could sign up for this newsletter
22 when they were signing up for DROP, and that was
23 amazing for us, because we already have 60,000 people
24 signed up for this newsletter, which we are so
25 grateful that they are interested in hearing more

1 information from the Agency. So that is the external
2 newsletter.

3 Then we also have DROP Digest. So when
4 you went through the DROP sign-up, you could sign up
5 for the external newsletter's quarterly updates, or
6 if you just wanted to hear about DROP, you're going
7 to want to sign up for our DROP Digest. And this
8 DROP Digest will just go out as needed, unlike the
9 quarterly newsletter. And as is the case for the
10 external newsletter, because people could sign up
11 during DROP, we already have 115,000 people
12 registered for DROP Digest.

13 So in conclusion, we'll continue to work
14 on the important foundation we have built,
15 particularly over the last year. This means
16 continuing to strengthen our partnerships, outreach
17 efforts, and media relations. We'll continue to
18 improve the privacy website, adding more resources,
19 and sharing our message through our various channels,
20 and much, much more.

21 Thank you for your time. Happy to answer
22 any questions.

23 CHAIR URBAN: Thank you very much, Ms.
24 White, and to you and your entire team. This is
25 spectacular. I've been looking forward to the

1 results of the plan, which seemed very well thought
2 out, and this surpasses my wildest expectations. Lo,
3 these many years ago, I negotiated a fair number of
4 online ad agreements, and I have never seen an
5 impression rate like that in my life, ever. So it --
6 as you say, it speaks, of course, to Californians'
7 enthusiasm for and desire to be able to exercise
8 their privacy rights. And I'm just absolutely
9 delighted that the Agency is meeting them where they
10 are. And I will be curious as to what you need and
11 what your team needs. But I will stop rather than
12 gushing and ask if there are other comments or
13 questions from the Board.

14 Ms. Ozer, please.

15 MS. OZER: I'll just say this is so
16 impressive. And just really appreciate sort of the
17 thoughtfulness of also making it available in
18 languages and in braille so that this really can
19 support, you know, Californians of all background
20 being able to really understand and exercise their
21 rights. I also -- I'll just say that I've also heard
22 really positive feedback about sort of the materials
23 that have been available to legislators to be able to
24 share with their constituents. And I just wondered
25 sort of for the upcoming plans, if you could touch on

1 a little bit about sort of some of the materials and
2 support, sort of to engage -- you mentioned Senator
3 Becker, but sort of other legislators and also being
4 able to support sort of the expansion and use of
5 resources from the Agency.

6 MS. WHITE: Of course, wonderful
7 question. And you know, you don't want to take too
8 long on your presentation, so I did omit the part
9 about partnering with elected officials. So I'm so
10 glad you asked this question. Beyond Senator Becker,
11 we participate in a lot of town halls that are run by
12 elected officials. Senior Scam Stoppers are an
13 example. And some elected officials just have their
14 own town halls, and either we're presenting quite
15 frequently with other state agencies, or on our own.
16 Our Executive Director Tom Kemp has gone out and
17 presented, I've presented, it's all hands on deck.
18 So there, we always like to do that. I work very,
19 very closely with our Deputy Director of Policy and
20 Legislation, Ms. Mahoney, and we are always in
21 contact about what does an elected official need, how
22 can we get it to them, if they want us to come speak,
23 they want something for their newsletter, we are
24 always here to help. So there is a more strategic
25 plan of how to get them even more involved, that will

1 be coming in the fall, and just really hearing from
2 them of what they can need, because they hear from
3 their constituents all the time. So they're the real
4 source of truth.

5 CHAIR URBAN: Thank you. I do have a
6 question about the 27% of California who have heard
7 of us versus the 80-ish who have not heard of us. In
8 my own research that tracks fairly closely to cohorts
9 of people who are aware of and very interested in
10 privacy issues. No. My research was a while -- that
11 I'm thinking of, it was a while ago. So it was
12 before privacy issues were as extant in the public.
13 They -- as much of a topic as they are now. But I'm
14 wondering how the team is thinking about reaching the
15 folks we haven't reached yet, just to let them know
16 we are here. Because I'm -- you know, everybody's
17 busy. Everybody's got lots of things going on and
18 probably have different levels of attention to the
19 issue.

20 MS. WHITE: Thank you, Chair Urban. I
21 think that is a wonderful point. People are busy,
22 and they've got to hear our message at least seven
23 times, generally, if they're not your privacy folks.
24 So I think we really saw this as a great example in
25 DROP; right? January 1st, we had a massive amount of

1 signups; that tends to be the folks who this is on
2 their radar. So now, how do we get the message in
3 front of those folks for whom grocery costs are on
4 their radar? We need to be as many places as we can,
5 and we need to be seen as a source of truth. And the
6 exciting, but unique, thing about us is there's no
7 other state that has an agency dedicated to privacy.
8 So I think that perhaps sometimes when Californians
9 think of their privacy rights, they might think of
10 going to the Attorney General or law enforcement. So
11 we need to just keep partnering with some of these
12 agencies where people are going to for their privacy
13 rights, to make it a little bit more clear we're here
14 to help. And then also being at those community
15 events, because there's a lot of hesitation -- I'll
16 be honest -- with government and giving your personal
17 information. And that's not just going to work
18 through an ad you see online. We got to go out there
19 and talk to people.

20 CHAIR URBAN: Wonderful. Thank you. And
21 in case I inadvertently might have suggested that the
22 other 80% don't care about their privacy, they care
23 deeply. They care deeply. Just aren't -- don't tend
24 to be as immediately aware of what's going on in the
25 space. And so this sounds like exactly the right

1 plan to me, especially the outreach to all of our
2 many communities in California. Thank you.

3 MS. WHITE: Absolutely.

4 CHAIR URBAN: Board Member Liebert,
5 please?

6 MR. LIEBERT: Excellent presentation.
7 Excellent work. Very exciting. I'm curious, of
8 course, about what's the most impactful, in your
9 experience, between billboards and social media and
10 other forms of communication, to reach all of those
11 people out there? And I also wanted to ask you about
12 your -- drilling down a little bit deeper on the
13 opts, the thinking as to how we're going to get that
14 word out.

15 MS. WHITE: For opt out, yes. Okay. So
16 for your first question, are you interested in paid
17 or are you interested in overall, if I was to tell
18 you from any outreach strategy or paid camp.

19 MR. LIEBERT: Yeah. Overall.

20 MS. WHITE: Overall earned media. So
21 when we get on KTLA, when we get on these big news
22 stations, that's where we've seen the biggest bump.
23 Now, that's in partnership with paid ads. I don't
24 think that if we didn't have those paid ads out there
25 in the ether, and people were seeing it, and then

1 they saw KTLA. So it all adds up together. But if
2 you just want to know what turned the clock, or
3 bumped up the volume, I guess, is a better way to put
4 it, it's going to be earned media.

5 In terms of OOPS, you know, rinse and
6 repeat. We've formed great relationships with these
7 reporters. We'll be reaching out to them in
8 December. "Hey, January, new law, let us come show
9 you." If the browsers have the ability for us to
10 show on screen, we can do that. Mr. Kemp has done
11 live interviews, and we walk people right through it.

12 CHAIR URBAN: Additional comments,
13 questions from the Board?

14 Ms. Carwile, is there public comments on
15 this item.

16 MS. CARWILE: This is for Agenda Item
17 Number 7, Annual Public Affairs Update. If you'd
18 like to make a comment at this time, please raise
19 your hand using a raised-hand feature or by pressing
20 star-nine if you're joining us by phone. This is for
21 Agenda Item Number 7.

22 Madam Chair, I'm not seeing any hands
23 raised at this time.

24 CHAIR URBAN: Thank you, Ms. Carwile.
25 Thank you again, Ms. White, and to your entire team

1 who are incredibly creative and thoughtful and have
2 been extraordinarily effective. So I just want to
3 send the Board's enthusiasm for the work back to the
4 team, and we look forward to your next update.

5 MS. WHITE: Thank you so much. Since we
6 run the board meetings, I know they're all watching.
7 So we appreciate it. And I'll head back now and let
8 the next presenter go.

9 CHAIR URBAN: Thank you again.

10 We will now move to Agenda Item Number 8,
11 which is -- promises to be another exciting update,
12 which is our next update on the Delete Request and
13 Opt-Out Platform. We are fully up and running with
14 DROP, comfortably within statutory deadlines and with
15 tremendous public interest and data broker execution
16 thus far. So I'm eager to hear the details of this
17 impressive work.

18 The item will be presented by Ms. Marissa
19 Roseblat, our assistant deputy director of public
20 and external affairs for the Delete Act, and Mr.
21 Artem Andrusov, who is the CPPA chief of IT. And I
22 will ask them to please go ahead.

23 MS. ROSEMBLAT: -- and to present with
24 Artem Andrusov, our Chief of IT, to share an update
25 on the Delete Requests and Opt-Out Platform, or DROP.

1 As background, the Delete Act passed in 2023 and
2 required Cal Privacy to build an accessible deletion
3 mechanism that would provide California consumers the
4 ability to submit one request to delete their
5 personal information from data brokers. That
6 mechanism is DROP, and it's the first of its kind
7 anywhere. DROP shifts the paradigm of exercising
8 privacy rights. Before, a consumer would have to
9 submit hundreds of requests to individual businesses,
10 a process which could take hours, if not days. Now,
11 with DROP, consumers who want to take back control of
12 their personal information can do so in about 10
13 minutes, for free, from their phone or computer.

14 Building DROP has been a focus of the
15 team since the Delete Act was passed in 2023, and
16 launching DROP has been our focus this year. On
17 January 1st, we launched the platform to consumers to
18 submit requests. And as of last week, on August 1st,
19 the obligation for data brokers to begin processing
20 those requests submitted by consumers went into
21 effect. So requests submitted are now becoming
22 requests processed. And today, less than a week
23 after that processing deadline began, there are
24 approximately 450,000 Californians who have already
25 submitted requests and are starting to see them being

1 processed in DROP. Almost 30% of data brokers have
2 begun processing close to 200 million identifiers
3 submitted across those requests, and approximately
4 10% of data brokers have already responded, reporting
5 status on deletions, opt-outs, exemptions, or records
6 not found.

7 I do want to take a moment to appreciate
8 what this represents. When the Delete Act passed
9 less than three years ago, it asked for something
10 that had never been done before. This mechanism for
11 a consumer to submit a request is really one of a
12 kind. There was no playbook for this, and building
13 DROP took careful design, thoughtful implementation,
14 and an unimaginable deal of alignment and teamwork to
15 become a reality. This work would not have been
16 possible without all of the efforts of a genuinely
17 cross-functional team, and so I do want to take a
18 moment to especially recognize the core DROP team at
19 Cal Privacy who has worked tirelessly to achieve this
20 milestone. That's Andrea Clawson, our data broker
21 analyst; Shannon Delp, who joined just a few months
22 ago as product manager for DROP; Elizabeth Allen,
23 attorney on DROP, who has been working on it since it
24 was just an idea; and, of course, Artem Andrusov, who
25 provided the technical vision for the system. I'm

1 going to give it to Art for a moment to continue the
2 thanks.

3 MR. ANDRUSOV: Thank you, Marissa.

4 While the core DROP team is small,
5 delivering the platform required us to bring together
6 a much larger and more complex network of people.
7 Together we aligned teams across development, legal,
8 design, procurement, architecture, security,
9 communications, and operations. We also worked
10 closely with California Department of Technology,
11 Department of Consumer Affairs, Department of General
12 Services, and the Department of Finance. At CDT
13 alone, about 20 people were actively involved during
14 the development phase, and up to 50 people across the
15 state agencies made meaningful contributions to this
16 platform over the past few years.

17 I want to thank everyone whose work
18 helped bring DROP to this important milestone, and I
19 also want to thank this board for its steady support
20 and direction through the process. Back to Marissa.

21 MS. ROSEMBLAT: So for today's update,
22 we'll cover three things: First, an update on the
23 consumer experience since launch in January. Two,
24 preparation for deletion request processing, which
25 has been a primary goal of the team this year. And

1 finally, a brief look ahead at what's to come.

2 So on the consumer experience side, we've
3 been working on improvements pretty much since we
4 launched. And largely these improvements have been
5 driven by direct feedback from consumers. We've been
6 able to streamline aspects of the residency
7 verification process, simplify the check-status and
8 profile-update flows, and enhance messaging across
9 the platform to better explain how processing will
10 work. One of our goals with DROP is to make privacy
11 easy, and the enhancements that we've made to the
12 experience to date really reflect that commitment.

13 On this slide is a snapshot of DROP by
14 the numbers. What you see on screen are numbers as
15 of July 15th, but as of this week, we're at
16 approximately 450,000 DROP requests submitted,
17 covering more than 200 million identifiers supplied
18 by Californians. Consumer demand remains really
19 strong. As was mentioned by Ms. White, we saw a
20 surge in interest in January, when the platform
21 launched, with days surpassing 18,000 requests
22 submitted in a day. Volume then stabilized, but
23 remained strong, and in the past couple of weeks,
24 since processing began, we've seen again a surge in
25 interest, and this effect is not terribly surprising.

1 Our early adopters signed up as soon as the website
2 was up, and now that deletions are occurring and
3 consumers can see the impact in real time, signups
4 are increasing, and we expect to see continued
5 demand.

6 Something else to highlight here. When
7 we group the feedback that we receive by consumers as
8 part of the submission process, one of the top
9 themes, 29%, is gratitude. And for a government
10 technology launch and service, that's really worth
11 pausing on. The number of consumers who trust us and
12 appreciate a government service and take time out of
13 their day to show that appreciation is really
14 something special. The next themes are around
15 residency verification and questions about mobile
16 advertising IDs, and those are areas where we're
17 investing further in improvements to the consumer
18 experience. I'm also pleased to report that our
19 current feedback scores, which are again collected at
20 the end of the submission process, are four and a
21 half out of five.

22 On the industry side. So since our last
23 update to the data broker registry, which we maintain
24 on our website, we have over 600 data brokers
25 registered. This is the highest number of registered

1 data brokers since Cal Privacy began managing the
2 registry in 2024, and a significant increase since
3 last year's number of approximately 545, thanks to
4 efforts across the Agency, from public affairs to
5 enforcement. And now that processing is starting,
6 the registry is even more important. In DROP,
7 consumers see all active data brokers in the system,
8 which includes the 600-plus registered, plus any data
9 broker who didn't operate in 2025 but is now required
10 to process requests in DROP, and who will be required
11 to register in January of next year. So the total
12 number that consumers see in DROP, in terms of
13 processing their requests, is over 640.

14 Our team actively maintains the
15 California data broker registry on our website, and
16 we've made a number of improvements to the design of
17 the registry this year, so information is even easier
18 for consumers and the general public to understand
19 and make use of. This includes adding filtering for
20 new disclosures that were required under SB 361. And
21 as a reminder, those disclosures include questions
22 about, for example, whether the business collects
23 reproductive health care information, union
24 membership information, whether they sell or share to
25 law enforcement, and much more. And the information

1 that data brokers provide as part of their
2 registration continues to be available on the
3 registry for download. Our team has spoken directly
4 with a number of researchers, journalists, and other
5 stakeholders who we know are actively using this
6 information to better understand data broker business
7 practices and the industry as a whole. And we're
8 really pleased that the data is useful to California
9 consumers, stakeholders, and beyond, and continue to
10 welcome questions and feedback about the registry.

11 So now that we've covered a bit about
12 DROP since our January launch, I'll move to the next
13 section, which is preparation for deletion request
14 processing, or DRP, since we always need more
15 acronyms. Preparing for DRP, which is a novel,
16 highly complex technical process, has really been
17 about two things. First, defining the workflow and
18 making it clear and easy to understand, and second,
19 of course, preparing the system itself.

20 So on screen is a simplified overview of
21 the steps required to process deletion requests
22 submitted to DROP. First, data brokers must access
23 DROP within 45 days to download consumer deletion
24 requests, and they do this by downloading consumer
25 deletion lists. Next, data brokers must standardize

1 and hash their records.

2 CHAIR URBAN: Ms. Rosemlat, I'm sorry to
3 interrupt you. On the first step, the lists that are
4 being downloaded are hashed.

5 MS. ROSEMBLAT: Correct.

6 CHAIR URBAN: Okay. I just wanted to say
7 that on this slide just in case someone is listening
8 from the public and wasn't aware that the data
9 brokers are not receiving the information in a
10 readable form.

11 MS. ROSEMBLAT: Correct. Thank you so
12 much for that. Yes, the consumer deletion list that
13 data brokers download from DROP contain hashes. And
14 I'm happy to take questions throughout. This process
15 is multi-step and complicated.

16 CHAIR URBAN: I didn't mean to interrupt
17 you flow. Go for it.

18 MS. ROSEMBLAT: Yeah. Thank you so much.
19 So the possible outcomes for step three include
20 records being matched and deleted, records being
21 matched and exempt, records being matched and opted
22 out, or, of course, no match being found. Finally,
23 within 45 days of download, data brokers must report
24 back to DROP with the status of the records they
25 processed. The system then takes this information

1 and displays the status back to consumers, who see it
2 in DROP.

3 So making this process clear and easy to
4 follow was our first goal. We defined and documented
5 this end-to-end DRP workflow, step by step, and
6 published the content in a new hub on our website
7 called DROP for Data Brokers. One of the most
8 important sections within DROP for Data Brokers are
9 our technical documents. Our tech talks go into
10 great detail on everything from status reporting to
11 file naming, to standardization and hashing rules,
12 schemas, and much more. Our tech talks are versioned
13 and will be maintained as the platform evolves.

14 The team worked not only to create this
15 content and resources, but also to promote them via
16 existing channels. We hosted a webinar earlier this
17 summer called Getting Ready for Deletion Request
18 Processing, to over 400 registered attendees, across
19 various functions from legal to business to
20 compliance to technical. The presentation covered
21 everything from high-level obligations under the
22 Delete Act, to detailed technical information about
23 processing requests and relevant deadlines. The
24 recording and presentation from that webinar are
25 available for review and download on our website. So

1 that's just a little bit about kind of how we defined
2 and promoted the workflow, and I'll pass it next to
3 Art, to cover how we prepared the system and platform
4 from an implementation standpoint.

5 MR. ANDRUSOV: One of the key priorities
6 in preparing for processing was giving data brokers a
7 way to test their integration and matching process
8 before their integration obligations began. For a
9 system that is novel and highly complex, testing
10 gives an opportunity to validate the entire process,
11 surface questions, and correct issues before they
12 affect production processing. For that reason, we
13 developed and launched the DROP Sandbox in April.
14 The Sandbox is available within the data broker
15 portal and contains synthetic deletion lists and a
16 synthetic test data set. No real consumer data is
17 used. Referring to our technical documentation for
18 data standardization and processing, data brokers can
19 test their API download, upload, and review results.

20 We also developed a standardization and
21 hashing tool. This allows a data broker to enter a
22 sample identifier, such as a name or an email
23 address, and immediately view the expected
24 standardized value and resulting hash. This gives
25 data brokers a direct way to verify that their

1 implementation of the standardization and hashing
2 rules is correct. And while testing in the Sandbox
3 remains optional, more than half of the data brokers
4 in DROP have already used it for testing. We value
5 the feedback received from the data brokers related
6 to the DROP Sandbox, and we will continue to develop
7 tools to make the process easy to understand and
8 follow.

9 The obligation to begin the processing of
10 deletion requests took effect last week, on August
11 1st. For this initial cycle, data brokers have 45
12 days to download, and then 45 days to report back.
13 And the fact that approximately 10% of data brokers
14 have already completed a cycle is a positive signal
15 about the system and how it is working technically.
16 One week in, the average DROP user has already had
17 over 20 deletions reported by data brokers. We're
18 already seeing some early responses from data brokers
19 showing match rates above 90%.

20 It's encouraging to see this level of
21 early engagement, and equally reassuring that the
22 platform has remained steady and responsive
23 throughout this initial phase. Our team has
24 established real-time monitoring and alerting to
25 oversee performance of processing cycles. Together

1 with the California Department of Technology, our
2 team is prepared to maintain a secure, highly
3 available system, capable of managing this workload.
4 Resources will be required to maintain system
5 stability as volumes continue to grow, and that
6 remains a priority for our team. Data brokers can
7 manage their processing activity in DROP, including
8 setting up email and web hook notifications to
9 streamline and automate their workflows. We plan to
10 continue investing in the data broker portal, and
11 developing tools and features that support
12 successful, stable, and compliant processing cycles.

13 Before I hand it back to Marissa, I
14 really do want to echo the gratitude and pride we
15 feel for what this team has been able to accomplish.
16 Novel technical projects are always challenging, yet
17 this team turned this challenge into a meaningful
18 service that scaled almost immediately, and is
19 already delivering impact.

20 MS. ROSEMBLAT: Okay. Thank you. So the
21 updates that we've covered thus far, I think, really
22 underscore the vast array and diversity of activity
23 happening in DROP. From consumers who need support
24 submitting a request, to data brokers who reach out
25 with technical or workflow questions as they

1 integrate with DROP for the first time. Our support
2 team is attentive to questions, issues, and feedback,
3 most especially in this initial launch year. We know
4 that support is usually the front line for issues, as
5 well as opportunities to improve the platform and the
6 service.

7 Just to highlight a couple of meaningful
8 statistics on support. We've responded to over
9 15,000 tickets since our launch in January, across
10 consumers and data brokers. We have a median
11 first-reply time of three and a half hours across the
12 board, and 77% of consumer tickets can be resolved on
13 the first reply. And I'll double-click on that
14 metric for a moment, as I think it's an indication of
15 two things. One, that we're able to effectively
16 resolve consumer issues with just one response. But
17 second, it's a signal that we can invest, and we
18 should invest, in additional messaging, content, and
19 resources, so we can help consumers get answers to
20 their questions and self-serve, without the need to
21 contact us. So we're actively working to grow the
22 DROP support team to address these kind of increasing
23 volumes and demand, both in terms of staffing and
24 tooling, and we have plans to add one or two
25 dedicated support staff by the end of this year, in

1 addition to technical staff who can assist with
2 support functions. And really, the goal of our DROP
3 support team is that it be an insights team. We want
4 to resolve issues, consumer and data broker, in a
5 timely manner, and also pay attention to trends,
6 feedback, and ideas that could help us improve the
7 platform and experience.

8 And to close out support, I wanted to
9 share with the board what consumers have shared with
10 us over the past several months, and so I've selected
11 just a few direct quotes from consumers that I'll
12 read now. First, "I received an alert from Credit
13 Karma about my Honda Civic. I don't have or own a
14 Honda Civic, but my grandmother does, and I take care
15 of her at the same address. This prompted me to
16 figure out why. Claude sent me here from this
17 inquiry." Next, "I heard about this on KDFC Public
18 Radio, and I'm very excited for California to be
19 leading the effort to curtail the sale of personal
20 data. The website is very easy to use, and thank you
21 so much for making the process easy. Cheers." A
22 third quote. "Feels like a lot of steps; removing
23 some of the barriers to entry might make it easier
24 for the most vulnerable folks who need this." And
25 finally, "I'm impressed with how slick the process

1 was to switch to and from my phone when verifying my
2 state ID. This is an excellent idea for a government
3 service, and I hope it works."

4 So before we close out today's update and
5 move into questions, I wanted to briefly preview
6 what's ahead. August 1st was obviously a huge
7 milestone for DROP and for this team, and it's really
8 just the beginning. Where we'll focus next is,
9 first, on operational excellence. The next 90 or so
10 days, as data brokers complete their initial
11 processing cycles, are critical. We're working on
12 ensuring the system and platform can handle ongoing
13 volume and growth. Monitoring, alerting, and
14 generally establishing practices to ensure our
15 quality standards are met is going to be key.

16 Next is measuring impact. DROP is new,
17 and so questions about how it's working are
18 incredibly interesting and also important, and most
19 of them have never been asked before. How is DROP
20 working, what is getting deleted, what are data
21 brokers reporting, what identifiers lead to the
22 highest match rates, and so on and so forth. There
23 are so many questions, and we're excited to dig in,
24 and we'll of course prioritize researching the
25 questions that enable us to fulfill the goals of the

1 Delete Act and deliver on our commitments to
2 Californians.

3 Third is preparation for scale. Building
4 on all of the above, our recent launch is the
5 beginning of a new, groundbreaking government digital
6 service. Scaling DROP means that the platform can
7 scale, and so can the team. On team specifically,
8 we're growing to match the program's new operational
9 reality. Hundreds of thousands of Californians
10 making requests, checking status, and over 600 data
11 brokers actively processing up to millions of records
12 every month, if not every day.

13 So just to close. California asked for a
14 single place where a consumer could tell an entire
15 industry to delete their data, and this small but
16 mighty team was able to deliver on that, on very
17 tight timelines with limited resources, and we're so
18 excited with the outcomes and really excited with
19 this next chapter.

20 So thank you, and with that we're happy
21 to take questions.

22 CHAIR URBAN: Thank you very much, Ms.
23 Rosemlat and Mr. Andrusov. This is extraordinarily
24 impressive. And I am amazed that you have had 11,000
25 tickets on 450,000 requests for a brand new system.

1 That really, really speaks to the care and the
2 technical acumen with which the system was built
3 already, as well as your responsiveness, of course,
4 to adjust as things go. And I also want to commend
5 and thank you for making the effort and expending the
6 resources -- which I know were in no small
7 proportion -- resources of human time and probably
8 exhaustion, to create a sandbox to create materials
9 for data brokers to make this as seamless as possible
10 for -- on the data broker side. None of that is
11 required by the law. And -- but of course, in order
12 for the system to be effective and to be usable by
13 everybody, it's an exceptionally helpful approach
14 that I think is in no small part responsible for the
15 fact that we already have data brokers inside the
16 first 45 days being able to take action on a consumer
17 request. So this is just incredibly impressive and
18 gratifying. And very grateful to the team for your
19 diligence and your brilliance.

20 Comments and questions from the board?

21 Ms. Hamer.

22 MS. HAMER: I echo everything that Chair
23 Urban just said. That was an amazing effort and
24 amazing results. And I'm excited that we have this.
25 And I get a lot of positive feedback that we have

1 this. Some feedback that I get is paranoia about
2 putting all of their information in. I try to
3 explain the hashing and, and that sort of thing. So
4 possibly combining with the public affairs about, you
5 know, how safe it is for people to use the state
6 option. I'm not going to direct anybody to the
7 federal option. But I think that might be helpful
8 because I want as many people as possible to be using
9 this. Do we have any concerns about scale and how,
10 how robust the system is to double, triple,
11 quadruple, you know, over a short period of time.

12 MS. ROSEMBLAT: Yeah. I'll respond to a
13 couple of points there. So on the question about, I
14 think, trust is certainly a collaboration with public
15 affairs to make explanations about things like
16 hashing clear and easy to understand, underscore the
17 efforts that we're taking on the technical side and
18 also on the program side to protect consumers privacy
19 as part of this process. So that will be an ongoing
20 collaboration. And we'll continue to develop
21 materials to really emphasize that point on the kind
22 of system operation and readiness side. And I may
23 pass it to Mr. Andrusov to add any additional detail.
24 But we saw, you know, incredible response in January
25 from consumers. And the system was able to kind of

1 flexibly scale to meet that demand. I think the same
2 thing will happen and is already happening with
3 processing, where volumes are very high and
4 processing volumes are coming in. And we're able to,
5 with our infrastructure, kind of flexibly adjust as
6 we go and monitor closely to ensure that that will
7 scale as the system continues to evolve.

8 Want to add anything else?

9 MR. ANDRUSOV: Yes. Marissa already
10 covered pretty much everything. The system has seen
11 abnormal spikes of activity of signups during,
12 around, the August 1st announcements, and at the same
13 time we had data brokers downloading actively the
14 largest lists, because this is in the beginning of
15 the program, so they're basically downloading
16 everything from the beginning, from January 1st. And
17 this platform sustained, effectively, all these
18 spikes, so we are confident that we will continue to
19 grow and be able to scale.

20 CHAIR URBAN: Great. Thank you.

21 Thank you. Mr. Liebert?

22 MR. LIEBERT: I have quite a few
23 questions, but I want to start with just a huge
24 congratulations because I actually consider this roll
25 out so far to be probably one of the best stories of

1 government success, serving the tax payers and
2 serving Californians. And you should all be so proud
3 of this accomplishment so far. I always say so far,
4 because I want to give you some space for when things
5 don't necessarily always work out perfectly. But
6 with such a lean staff as well, it's remarkable. You
7 know, I suspect if we had one of our technology
8 companies doing this, there'd probably be 300 to 500
9 people doing it. And we have this very lean staff
10 that's doing this accomplishment. So
11 congratulations.

12 One of the things I wanted to ask was, I
13 want to make sure that we give credit to the
14 enforcement side of this. Because to me, one of the
15 great challenges it sounds like we're facing is to
16 make sure we get a whole bunch more of those data
17 brokers out there actually registering and working in
18 the program. Is that a sense that you have as well,
19 Marissa?

20 MS. ROSEMBLAT: I think enforcement of
21 data broker activity is a priority for the
22 enforcement division. Yes.

23 MR. LIEBERT: Yeah. Okay. The other
24 question I had was, where do you anticipate that we
25 will need the most additional resources in terms of

1 staffing as we get more and more people into the
2 system and more and more data brokers, et cetera?

3 MS. ROSEMBLAT: Yes. I think it's two
4 categories, really. And it's consistent with a large
5 consumer technology kind of platform. It's on kind
6 of support and technical staff. So folks who can
7 continue to evolve the system, maintain and operate
8 the system, and then folks who can respond to
9 inquiries and questions as they come up, both from
10 data brokers who use the system and consumers who are
11 submitting and verifying requests.

12 MR. LIEBERT: And then my final question
13 is just about how do we -- and this may be partially
14 you as well, Megan -- but take advantage of the
15 interface that consumers are doing now with DROP to
16 direct traffic to our fabulous Cal Privacy website
17 for all those other resources; right? Including
18 OOPS, et cetera, that we're going to have as to
19 protect their rights.

20 MS. WHITE: Correct, Board Member
21 Liebert. I think this is exactly why DROP is housed
22 within public affairs for that very reason, so we can
23 continue to evolve and get the message out. So
24 Marissa and I talk every day -- multiple times a day.
25 So we definitely have that as a focus.

1 MR. LIEBERT: Great. So you're planning
2 on that to maximize that connection.

3 MS. ROSEMBLAT: Yeah. That's right. So
4 we've been able to kind of capture the attention.
5 And now we have, you know, email addresses from folks
6 who want to learn more about DROP or from the Agency.
7 And so we now have an opportunity to continue
8 outreach to promote other tools similar to DROP,
9 other things that might take ten minutes or less to
10 do that Californians can use to exercise their
11 privacy rights and gain better control over their
12 personal information. So we'll use those channels
13 available to us, DROP Digest, the website messaging,
14 to really get the word out about additional resources
15 that we can provide.

16 MR. LIEBERT: Great. Thanks.

17 CHAIR URBAN: Thank you.

18 Board Member Ozer?

19 MS. OZER: Yes. This is very impressive,
20 and I admit the following, and ask this question on
21 behalf of similarly situated Californians. I did the
22 DROP request on January 2nd. And of course, it said,
23 "Be sure to keep this DROP ID." I kept it somewhere
24 eight months ago, but I don't remember where I kept
25 that. And when I went to the website, of course,

1 there was an option for me to request my DROP ID, but
2 it requires submitting the ticket. So now I have
3 submitted the ticket. I just did it. I just
4 submitted the ticket. And so I wondered: One, how
5 long you think it will take for people to then get
6 their DROP ID, if they have forgotten their DROP ID.
7 And also, I guess a question for you is just, if
8 there are a lot of similarly situated Californians
9 like myself, I'm a little concerned about how many
10 tickets might be coming into you all and whether or
11 not you all thought about some other process that
12 wouldn't require the tickets. Because I'm a little
13 concerned if there are a lot of folks like me, and
14 I'm guessing there may be.

15 MS. ROSEMBLAT: Thank you for the
16 question. Yes. You're in good company. You are not
17 the only person who has lost their DROP ID. And I
18 think we're looking at it from a couple of angles.
19 First, ways to make the message more prominent as
20 soon as you get it, message to make it clear you can
21 save it. You can request a copy sent to you via
22 email if you'd like. And really seeing if we can
23 kind of do it when it's first provided. Second, is
24 finding ways to streamline and allow for retrieval in
25 an automated way. There is a path forward to do

1 that, and it's on our roadmap once resources permit.
2 So we can make it very fast. So a consumer can
3 submit the request, get it, and immediately receive
4 it so they can check status. And in the meantime, it
5 is a request and a ticket, and someone will respond
6 to you shortly.

7 MS. OZER: Yeah. No need to -- you know,
8 I'm just another ticket. But I was just both
9 concerned and I assume they're paying people like
10 that and just concerned how many tickets you all are
11 going to get. So if we can streamline that, that
12 would obviously be good.

13 MS. ROSEMBLAT: Thank you.

14 CHAIR URBAN: I'm not anticipating losing
15 my DROP ID. I haven't lost it yet, but it's
16 certainly a possibility.

17 Any further comments or questions from
18 the Board?

19 Oh, yes, please. Board Member Liebert?

20 MR. LIEBERT: I'm going to be very
21 curious -- and perhaps you are as well -- but just in
22 terms of the numbers of consumers who then, after
23 signing up to DROP, actually, then go back and find
24 out what's been happening. That's going to be really
25 interesting. And I was wondering how we're going to

1 track that and what your thoughts are about that?

2 MS. ROSEMBLAT: Yeah. It's a great
3 question. We do have tracking for that, so we can
4 see who's coming back to check status. I see Art
5 refreshing a dashboard here, so I think we'll be able
6 to pull a rough percentage in a moment. Yeah. So
7 approximately 10% have come back to check status
8 already.

9 CHAIR URBAN: All right. Ms. Carwile, is
10 there any public comments on this item?

11 MS. CARWILE: This is for Agenda Item
12 Number 8, Delete Request From the Opt-Out Platform
13 Update. If you'd like to make a comment at this
14 time, please raise your hand using the raised-hand
15 feature or by pressing star-nine if you're joining us
16 by phone. This is for Agenda Item Number 8.

17 Benjamin, I'm going to unmute you at this
18 time. You'll have three minutes. Go ahead and begin
19 when you're ready.

20 MR. ISAACSON: All right. Thank you. My
21 name is Ben Isaacson. I am the principal with
22 In-House Privacy, Inc. We are a law firm that
23 advises businesses on marketing, data, advertising
24 services, including data brokers that are compliant
25 with the California Delete Act. I just want to start

1 by saying, what a tremendous effort. I want to
2 congratulate Cal Privacy on completing DROP in time
3 under the Delete Act's specific requirements, and
4 incorporating many of the elements of privacy by
5 design to protect consumer information. Again,
6 congratulations for getting it done the way that you
7 have done it.

8 On July 31st, my law firm submitted a
9 letter to the Cal Privacy mailbox, as well as to some
10 employees, identifying numerous areas for
11 clarification across technical, operational, and
12 legal policy issues. If the Chair wanted to grant me
13 more time, I could go into some of those issues, but
14 again, those comments are public, already submitted
15 to Cal Privacy, as well as on In-House Privacy's
16 website, and even on LinkedIn profile page.

17 What I really wanted to talk about today,
18 in addition to the clarification requests, is that we
19 are requesting that Cal Privacy consider -- the
20 enforcement division consider -- a one-year
21 transitional period and a 90-day cure period for
22 potential discrepancies with how registered data
23 brokers are complying with DROP. This transitional
24 period would only apply to currently registered data
25 brokers, as of August 1st, who complete regular

1 access requests, endeavor to report unmatched, and
2 maintain documented procedures for their compliance
3 efforts, as well as report any discrepancies in a
4 reasonable fashion.

5 Just as a reminder, Cal Privacy today
6 could implement statutory penalties under the Delete
7 Act for any errors by data brokers with their current
8 implementation of DROP. That includes \$200 per
9 consumer request per day. That could result in
10 millions of dollars of fines against companies that
11 are endeavoring to comply in good faith with the
12 current DROP mechanism.

13 So, you know, again, we are requesting
14 just a good-faith consideration. There is nothing in
15 the Delete Act that provides a safe harbor for minor
16 discrepancies in how reporting is done with DROP, or
17 any errors in the transmission process. And again,
18 as we've identified in our letter, there are times
19 when even the DROP interface has downtime, and in
20 that downtime could be that acute period in which a
21 data broker is trying to maintain their updates, and
22 they may not be able to. And even in that situation,
23 the enforcement division could still enforce against
24 that company for not completing those updates, even
25 if it's on the 44th day, at 11:59 p.m., one minute

1 left in that time period. And so, again, there are a
2 lot of issues like this that are just common software
3 development issues that we've identified in our
4 letter, that could lead to discrepancies in
5 compliance, and that we are requesting that there be
6 just some consideration for those discrepancies, in
7 this transitional period, over the course of a year,
8 ideally, that includes --

9 CHAIR URBAN: Thank you. That is your
10 three minutes. And thank you for the letter, which I
11 know the staff will take care to attend to. Thank
12 you for the comment.

13 MS. CARWILE: If there are any other,
14 other members of the public who'd like to speak at
15 this time, please go ahead and raise your hand using
16 Zoom's raised-hand feature, or by pressing star-six
17 if you're joining us by phone. Again, this is for
18 Agenda Item Number 8.

19 Madam Chair, I'm not seeing any
20 additional hands raised at this time.

21 CHAIR URBAN: Thank you, Ms. Carwile.
22 And thank you very much again for the comments and
23 the information about implementation, which I know is
24 of great value to the team.

25 With that, we will move to Agenda Item

1 Number 9. Agenda Item Number 9 is discussion and
2 possible action to amend regulations sections 7600
3 and 7611 to adjust CPPA's data broker registration
4 and access fees. This will also be presented by Ms.
5 Marissa Rosemlat. It is related to our Delete
6 Act's function.

7 To provide some very brief background to
8 the public and board members who may have joined us
9 since our last discussion of the topic, the
10 legislature chose to fund Delete Act functions --
11 excuse me -- such as the registry and DROP through
12 fees charged to data brokers. The Agency assesses
13 costs and periodically sets or adjust the
14 registration fees to cover the cost of administering
15 legislatively mandated functions. Today, we are
16 discussing updates to the fee. And with that, I
17 would like to hand it over to Ms. Rosemlat.

18 MS. ROSEMBLAT: Thank you. So we've just
19 covered in detail the exciting launch and progress
20 made on the DROP platform, program, and team. DROP
21 today looks very different than it did just one year
22 ago. We now have a consumer base of close to 450,000
23 Californians, with thousands more requests being
24 submitted every week, and over 600 data brokers who
25 are required to register with the Agency, access the

1 system, and process millions of requests, or
2 identifiers, on an ongoing basis. DROP is live.
3 It's a real-time, highly available and accessible
4 system.

5 So as part of this update, I'll cover a
6 little bit of background on the registration and
7 access fees, and staff's proposal to adjust the
8 amount of next year's 2027 registration and access
9 fees, to cover costs of operating the live system and
10 managing the program. As a reminder, the data
11 broker's registry fund is administered by the Agency
12 and used for the deposit of all monies collected or
13 received by the Agency under the Delete Act, and
14 offsets the cost of administering the law. And as
15 part of the materials submitted for this update, you
16 should each have a short memo and a fund condition
17 summary that provide additional background and
18 context for our proposal. As you review those
19 materials, please do note PY refers to prior year, CY
20 refers to current year, and BY refers to budget year,
21 which runs from July 1st to June 30th.

22 The fee this year, in 2026, is \$6,000.
23 Last year, staff were able to propose a reduction in
24 the registration fee from \$6,600 in 2025 to \$6,000 in
25 2026, and that reduction was based on a

1 higher-than-anticipated registrant population, an
2 increase in penalty revenue, and utilization of the
3 fund's existing balance. We do review fund
4 conditions on an ongoing basis, and adjust our
5 projections dynamically. When DROP was launched in
6 January of this year, the response was overwhelmingly
7 positive, and consumer usage surged. Based on usage
8 post-launch, we even submitted a May Revision
9 proposal for additional resources, as our previous
10 assumptions, even for the 26-27 fiscal year, didn't
11 account for these increased volumes. The costs
12 associated with increased demand -- for example, the
13 cost to verify residency of each California consumer
14 who wants to submit a request -- are now factored
15 into our projection.

16 Accordingly, staff recommend an increase
17 in next year's registration fee to \$9,500. More
18 specifically, the factors contributing to this
19 proposed fee increase are an increase in the number
20 of residency verifications needed to support request
21 volume by California consumers, higher infrastructure
22 costs as a result of ongoing system use and
23 maintenance, and the need for additional resources
24 and staff who can maintain and operate the system.

25 While we did consider these costs in past

1 estimations, they were just forecasts, and we only
2 assess fees based on current needs, to reduce impact
3 on industry. The proposed fee of \$9,500 will offset
4 the reasonable cost of administering the Delete Act
5 and will ensure solvency through fiscal year '27/'28.
6 As the platform and program evolve, we will monitor
7 expenditures and adjust fees as necessary to cover
8 costs. The proposed increase applies to the
9 registration fee, as well as the access fee, which is
10 prorated, and would thus be \$9,500 for the month of
11 January, with \$792 prorated each month thereafter.
12 So with that context, happy to provide additional
13 information or take questions.

14 CHAIR URBAN: Thank you very much, Ms.
15 Rosemlat. And thank you for the very helpful memo
16 that you prepared for us and the public.

17 Comments or questions from the Board?
18 No?

19 Yes. I will just say that your process
20 for evaluating on an ongoing basis what costs need to
21 be recouped through the fees seems extremely solid to
22 me. And I really do appreciate the care that you
23 take to be sure that the requirements are covered
24 with an eye towards making sure that we're recouping
25 costs. And keep keeping up with that and being

1 reasonable in terms of what we're asking for.

2 Ms. Carwile, I will be requesting a
3 motion to approve this fee change. And I'll read it
4 out so the public has it and then ask for public
5 comment.

6 The motion that I would like to request
7 is to direct staff to amend Section 7600 of the
8 regulations to adjust the California privacy
9 protection agency's data broker registration fee to
10 \$9,500, plus associated payment processing fees, and
11 to amend the access fee described in Section 7611 to
12 \$9,500 in January and prorated by \$792 for each
13 subsequent month, plus associated payment processing
14 fees. So that is the motion that I will request.

15 Is there a public comment?

16 MS. CARWILE: Yes. This is for Agenda
17 Item Number 9, Discussion and Possible Action to
18 Amend Regulations of Section 7600 and 7611 to Assess
19 CPPA's Data Broker Registration and Access Fees. If
20 you'd like to make a comment at this time, please
21 raise your hand using the raised-hand feature or by
22 pressing star-nine, if you're joining us by phone.

23 I do have a commenter. Benjamin, I'm
24 going to unmute you at this time. You'll have three
25 minutes. Go ahead whenever you're ready.

1 MR. ISAACSON: Ben Isaacson, In-House
2 Privacy, Inc. I again appreciate all the work that's
3 gone into DROP, and the resources and intensity that
4 requires more time and resources. I think there's
5 one thing missing from this agenda, around the
6 potential enforcement actions that may come up
7 between now and the end of the year, and whether or
8 not the board and Cal Privacy has considered the
9 revenue from those enforcement actions as potential
10 subsidy for the fee increase, instead of requiring
11 that fee to take place. I think we've gone on the
12 right record historically as saying there are many,
13 many unregistered data brokers today that should be
14 registered. And if that is the case, only one of
15 those enforcement actions, based on the 345,000
16 records, would be millions of dollars in potential
17 revenue Cal Privacy -- that they could easily use to
18 subsidize the fee structure for registered data
19 brokers, maybe even taking it back to the original
20 \$500 instead of increasing it to \$9,500.

21 And then my final comment on that is that
22 we're already way into a budget planning year for
23 2027, and this \$3,500 increase will come at a
24 significant strain on the registered data brokers who
25 have not budgeted for that increase, and kind of, I

1 think, anticipated that it would at least stay the
2 same, or perhaps go down, in light of those potential
3 enforcement actions with the major statutory
4 penalties that are afforded to the enforcement
5 division for those unregistered data brokers,
6 especially, again, with the track record Cal Privacy
7 has shown, for now years, of enforcing against
8 unregistered data brokers. Again, I would think only
9 one of those enforcement actions at this point would
10 clearly subsidize DROP for 2027.

11 CHAIR URBAN: Thank you very much for the
12 comment.

13 MS. CARWILE: If there are any other
14 members of the public who like to speak at this time,
15 please go ahead and raise your hand using Zoom's
16 raised-hand feature or by pressing star-six if you're
17 joining us by phone. This is for Agenda Item
18 Number 9.

19 Eric Woolf, I'm going to unmute you at
20 this time. Go ahead and begin. You have three
21 minutes, when you're ready. Eric Wolf, go ahead.

22 MR. WOOLF: Sorry. I think I just come
23 up. Okay. Can you hear me now?

24 MS. CARWILE: Yes, we can.

25 MR. WOOLF: I am a list broker out of New

1 York following your CCPA regulations. We just did
2 our first drop submission this week. But my comment
3 on the fee -- and I've inquired about this
4 previously -- is, has any consideration been given to
5 a sliding scale fee based on the size of the company.
6 And there are companies within our industry that are
7 doing probably 60 or 70 times or more the revenue
8 than my company does. And they're paying the same
9 fee. They have the technical resources to build out
10 the API, whatever it happens to be. And my company
11 is paying the same fee as those, and I have to do all
12 of the same processing that they do without nearly
13 the resources. And the response has been previously,
14 well, we don't have a way to assess the revenue of
15 your company. Well, you do have a way. Why not give
16 us the ability to provide A tax return or some
17 information that allows you to see, well hey, this
18 company's doing \$5 million a year, and there could be
19 a sliding scale based on that. I mean, I feel like
20 that -- it's becoming increasingly unfair, especially
21 now that you're raising it another 50% going into
22 next year. And, like the prior gentleman just said
23 we haven't budgeted for that. And now all of a
24 sudden in August, now we're having to look at
25 budgeting aspects for that going into next year.

1 Thank you.

2 MS. CARWILE: Thank you for your comment.
3 If there are any other members of the public who'd
4 like to speak at this time, please go ahead and raise
5 your hand using Zoom's raised-hand feature.

6 Madam Chair, I'm not seeing any other
7 hands raised at this time.

8 CHAIR URBAN: Thank you, Ms. Carwile.
9 And thank you for both of those public comments.

10 Is there further comments or discussion
11 from the Board?

12 In that case, I'd like to request the
13 motion as stated.

14 MS. HAMER: So moved.

15 CHAIR URBAN: I have a motion from a
16 Board Member Hamer. Is there a second?

17 MR. LIEBERT: I second it.

18 CHAIR URBAN: I have a motion from Board
19 Member Hamer and a second from Board Member Liebert.

20 Ms. Carwile, would you please conduct the
21 roll call vote?

22 MS. CARWILE: Yes. This is a roll call
23 vote for the motion as stated by the Chair.

24 Board Member Hamer?

25 MS. HAMER: Aye.

1 MS. CARWILE: Board Member Liebert?

2 MR. LIEBERT: Aye.

3 MS. CARWILE: Board Member Mactaggart?

4 Board Member Ozer.

5 MS. OZER: Aye.

6 MS. CARWILE: Chair Urban?

7 CHAIR URBAN: Aye.

8 MS. CARWILE: Madam Chair, you have four
9 yeses and one not voting.

10 CHAIR URBAN: Thank you very much. The
11 motion carries with a vote of four to zero.

12 We will move next to Agenda Item
13 Number 10 in -- while we change presenters, I would
14 like to take a short break. So let's take about a
15 ten-minute break and come back at 11:30. We will see
16 you then. Thank you.

17 (Whereupon, a short recess was
18 taken.)

19 CHAIR URBAN: Welcome back, everyone to
20 the California Privacy Protection Agency Board
21 Meeting for August 6th and 7th. We will now move to
22 Agenda Item Number 10. Agenda Item Number 10 is the
23 discussion and possible action to advance draft
24 regulations regarding data broker drop compliance
25 audit to formal rulemaking. So this is an additional

1 function in the Delete Act with relation to DROP,
2 which is compliance audit for data brokers. It will
3 be presented by our general counsel, Philip Laird,
4 Liz Allen, CPPA attorney, and Jill of all skills and
5 trades, who has been with the DROP from the very
6 beginning, and Kevin Sabo, our legal division
7 specialist, also many skills and trades in Kevin's
8 shop. Thank you very much for being here and for the
9 clear materials on a complicated issue to put on the
10 paper. And with that, I will turn it over to the
11 team.

12 MR. LAIRD: Thank you, chair, urban and
13 members of the board. So in a moment, we'll be happy
14 to pass it to my colleagues. As you know, we've --
15 we're undertaking in the legal division a number of
16 rulemaking projects. And Liz and Kevin have been the
17 force behind these draft regulations you're reviewing
18 today. I also have to just point out that this
19 rounds out our presentation by privacy lawyers of the
20 year today. With Liz Allen being recognized --

21 CHAIR URBAN: Oh my gosh. I said
22 yesterday that I was not going to miss this
23 opportunity, and then I missed it. All right. So
24 you get to talk about it.

25 MR. LAIRD: You're allowed to, Ms. Urban

1 if you want to.

2 CHAIR URBAN: So Liz Allen, our very own,
3 was the 2025-26 to say -- oh, they decided at 4/26,
4 I'm getting the years wrong. All right. 2026
5 California Lawyers Association Privacy Section --
6 Privacy Lawyer of the Year, rounding out the entire
7 set over the course of this meeting for all of them.
8 And it's just -- again, it is a testament to the
9 skill, care, and quality of the people who have
10 chosen to devote part of their career to this agency.
11 And we are very appreciative. Please go ahead.

12 MR. LAIRD: Yeah. So with that, I'm
13 going to turn it over to Ms. Allen and Kevin Sabo to
14 give this presentation.

15 MS. ALLEN: Okay. Thank you so much.
16 Thank you, Chair Urban, members of the Board. Again,
17 Liz Allen, attorney, and I'm staffing, of course, the
18 Delete Act. And with me is Kevin Sabo, legal
19 specialist. And as many of you know, I've been
20 working on the Delete Act since its inception about
21 three years ago, and I've had the pleasure of --
22 today, I have the pleasure of walking you through the
23 Agency's third substantive regulatory package that
24 helps implement the Delete Act.

25 So, given that table setting -- great.

1 Here's the roadmap for today's item. We're going to
2 start with a little background, some overview of the
3 DROP audits. We're going to recap our preliminary
4 rulemaking activities and some public comments.
5 We're going to present our staff recommendations to
6 the board, and then, of course, we'll open it to take
7 any questions. I'm just kidding.

8 There we go. Got it. Okay. Great. So
9 DROP. At a high level, the DROP audits are all about
10 checking one thing. Is the data broker processing
11 consumer deletion requests in compliance with the
12 law? Marissa covered much of the background of the
13 Delete Act, so I'm just going to focus your attention
14 on this one requirement, which is that beginning
15 January 1st, 2028, and every three years thereafter,
16 a data broker shall undergo an audit by an
17 independent third party to determine compliance with
18 this section. Now, this section is the deletion
19 request processing section, 86. So hence limiting
20 the scope of the audit. Note, you'll see that the
21 registration is not included in the audit
22 specifically. However, in this package, we've also
23 included updates to the current regulations as well.

24 So -- oh, good. Great. There you go.

25 MR. SABO: So, to review the Delete Act

1 timeline for those unfamiliar, the Delete Act was
2 originally approved by the legislature and the
3 governor in October of 2023. The Agency's initial
4 DROP system regulations were approved by the board,
5 as you may recall, and the Office of Administrative
6 Law, in November of 2025, last year, and then DROP
7 officially launched on New Year of this year, in
8 2026. And then, just on the first of this month,
9 data brokers just began processing DROP requests on
10 August 1st. The mandatory audit provisions then go
11 into effect on January 1st, 2028. Therefore, the
12 commencing of the rulemaking process now is so
13 necessary, because the regulations need to be in
14 place once the audit obligation takes effect. So,
15 from here, we'll go on to some of the preliminary
16 rulemaking activity that we undertook.

17 Earlier this year, we initiated
18 preliminary rulemaking activity to evaluate and
19 incorporate stakeholder input as appropriate, before
20 rulemaking activity. Staff conducted research of
21 both U.S. and international practices, consulted
22 academics and other agencies, and invited preliminary
23 comments on several topics, such as auditor
24 qualifications and audit evidence. Specifically, we
25 received 12 comments, totaling 77 pages, from a range

1 of stakeholders, including ad-tech, data brokers,
2 nonprofits, auditors, and small businesses.
3 Similarly, key themes included strengthening auditor
4 independence and qualifications, prioritizing
5 evidence over assertions, clarifying identifiers and
6 match rate expectations, particularly around
7 zero-match scenarios, addressing deletion and backups
8 in downstream contexts, phased remediation, and
9 audit-scope discipline. Like the OOPS team
10 yesterday, these inputs informed our recommendations.

11 MS. ALLEN: In shaping its
12 recommendations, staff also aligned the audit
13 regulations with the existing cybersecurity audit
14 regulations, to simplify compliance. So many of the
15 provisions will mirror familiar language, especially
16 those who were around for that package, and concepts
17 from the cybersecurity audit rules. Special thanks
18 to Kristen Anderson, whose careful and thorough
19 drafting informed these regulations.

20 Although the statute -- there we go --
21 indicates that audits are to be completed every three
22 years, there's actually no further guidance on
23 timing. So, accordingly, we sought to specify
24 exactly when audits must be completed, and what time
25 periods they review. In the proposed draft, initial

1 audits for any business that was a data broker
2 between essentially August 1st, this year, and
3 December 31st, 2027. So the first year and a half
4 they must complete an audit in 2028, and the audit
5 period will include the first two years after the
6 requirement to access DROP began. For everyone else,
7 their first audit will review the first year of their
8 data broker activity, regardless of the calendar
9 year. So for example, if you're a data broker that
10 started April 1st, April 1st to March 31st would be
11 their first audit period. Now, any data broker that
12 stops and then restarts data brokering activity, they
13 must complete an audit in the first year that it
14 again began operating as a data broker. So after the
15 first audit is complete, then all data brokers must
16 complete an audit every three years. And so, to
17 reduce duplicative efforts, brokers may use an audit
18 or assessment prepared for another purpose, such as
19 cybersecurity audit, provided that it contains all
20 the required information, alone or with
21 supplementation.

22 Next, we're going to look at auditor
23 qualifications and independence. So, unlike
24 cybersecurity, which allows for the use of an
25 internal auditor, the Delete Act specifically

1 requires that audits are completed by an independent
2 third-party auditor. Therefore, the proposed
3 regulations include standards to ensure that the
4 auditor is truly independent, and any conflicts of
5 interest are prohibited. Similar to the
6 cybersecurity audit requirements, to ensure the
7 integrity of the audit, the proposed regulations
8 include that the audit must be conducted by a
9 qualified professional using procedures and standards
10 accepted by the audit profession. In addition, given
11 the specificity of the statute, the regulations
12 require at least one audit team member to have
13 experience in data deletion and retention practices,
14 including knowledge of the Delete Act and CCPA
15 requirements.

16 Okay. Next, we'll look at the scope and
17 evidence standards. So the proposed regulations
18 include provisions to ensure that the scope of the
19 audit and the information it relies on are
20 appropriate. So audits, of course, must cover the
21 entire audit period, and each step, from list
22 selection through actioning and reporting. The
23 auditors must examine policies and procedures, like
24 system logs, hashing evidence, matching results,
25 deletion commands, suppression list entries, and

1 status reports. But they also actually must test to
2 ensure all deletion and processing steps are
3 completed. So we have process and outcome both. And
4 the auditors must conduct interviews of relevant
5 personnel. No finding of any DROP audit may rely
6 primarily on assertions or attestations by data
7 broker's management, or the mere existence of a
8 policy or procedure.

9 So now we're going to take a deep dive
10 into the component coverage. This is kind of the
11 meat of the regulations. The audit will evaluate
12 nine different components that are essential to
13 deletion request processing under Section 86. So
14 these are the steps that data brokers have to take in
15 order to process deletion requests, and there are
16 nine of them. So I'll leave them up there, but
17 essentially it goes through everything from list
18 selection all the way through each step. Looking at
19 things like hashing, making sure it's the correct
20 format, verifying the outputs of the hash, things
21 like status reporting, making sure the codes and the
22 format is correct, that it's timely, that it's
23 complete, and that it's accurate. And, of course,
24 for service providers and contractors, got to make
25 sure that the direction was sent, and there's

1 reasonable steps to verify action. So the auditor
2 must ensure that all of these have been actioned.

3 So last, in this audit section, is the
4 report and certification and retention. So the audit
5 report requirements include who did the audit, what
6 they did for the audit, findings related to
7 compliance or lack thereof, how will they address any
8 lack of compliance, and then, similar to the
9 cybersecurity audit regulations, certifications are
10 required from both the auditor and the management
11 person responsible for the program. And that
12 concludes the audit section of these regulations.

13 The second part you'll see here that we
14 presented to the board is the conforming updates to
15 the general DROP regulations. So DROP, of course,
16 has been live since January, at least on the consumer
17 side, and live for data brokers. So staff have now
18 been able to identify operational realities that were
19 honestly not totally foreseeable when the
20 system-related regulations were initially enacted,
21 like over a year ago, or initially presented. So in
22 order to keep the regulatory framework internally
23 consistent, and to ensure that audit regulations
24 function properly within it, staff recommend adopting
25 a set of conforming amendments to the general DROP

1 regulations. These updates are really technical and
2 operational in nature, reflecting items such as
3 timely account information updates, clear
4 registration standards, and a refinement to the
5 status upload requirements.

6 So for updates to the account and
7 registration accuracy requirements, we've made it
8 clear that registrations must include complete and
9 accurate information. And we've changed a bunch of
10 operational refinements to reflect real system-use
11 patterns. So, for example, we removed the 45-day
12 limit on changing which identifier list businesses
13 can download, allowing real-time adjustments to match
14 business practices. This change should improve
15 matching between DROP requests and data broker
16 records, and make deletion processing more accurate
17 and ultimately more effective. We also clarify data
18 broker suppression list obligations, and this is
19 based largely on industry feedback. So the term
20 suppression list is defined -- newly defined, and it
21 tells data brokers essentially what information they
22 can keep, and the proposed amendments specifically
23 state that data brokers are to screen incoming data
24 against consumers who have submitted DROP requests,
25 including for those where there was no match

1 initially found.

2 So we also clarified procedures for
3 maintaining complete and timely broker information.
4 So section 7610 now requires data brokers to update
5 their DROP account information, including contact
6 details, within 10 business days of any change, and
7 this will prevent outdated information from
8 lingering. We also added the additional addition of
9 several definitions, to improve clarity across the
10 regulations, to make sure we're being consistent. So
11 things like identifier or batch, which should help
12 both the regulated industry and auditors ultimately.

13 So, having provided that overview, it's
14 our recommendation that the board direct staff to
15 initiate formal rulemaking, including opening a
16 45-day public comment period. As mentioned at the
17 outset, this will ensure the Agency has sufficient
18 time to receive and consider comments, making
19 amendments if necessary, and then complete the
20 rulemaking in advance of 2028, which would be the
21 first audit. So, thank you, and please let us know
22 if you have any questions.

23 CHAIR URBAN: Thank you very much, Mr.
24 Sabo, and Ms. Allen, and Mr. Laird.

25 Are there questions or comments from the

1 Board on these updates to the regulations? No?

2 One board member. Board Member Ozer?

3 MS. OZER: Just the annual registration
4 fee --

5 MS. ALLEN: Yeah.

6 MS. OZER: -- which is listed. If we
7 just -- did we just change that?

8 MS. ALLEN: Yes. So.

9 CHAIR URBAN: That will then be amended.

10 MS. ALLEN: Yeah. Yeah. And that will
11 be amended. It also goes through a slightly
12 different track. So this is a 45-day notice and
13 comment. And the fee goes through a different
14 rulemaking than -- Mr. Laird can.

15 MR. LAIRD: Yeah. Just for clarity,
16 there's an exemption in the Delete Act for fee
17 setting from the Administrative Procedures Act. So
18 your action today to adopt the new fee essentially
19 will result in the regulation changing automatically
20 once we file with the Office of Administrative Law
21 versus the rest of this rulemaking will go through
22 the traditional rulemaking process.

23 CHAIR URBAN: Thank you very much. I am
24 ready to request a motion to direct staff to advance
25 the proposed draft regulations provided today in

1 connection with Agenda Item Number 10 to formal
2 rulemaking, including commencement of the 45-day
3 public comment period, and to authorize staff to make
4 additional changes where necessary to reflect the
5 Board's discussion today and improve the text,
6 clarity, or otherwise ensure compliance with the
7 Administrative Procedures Act. That is the motion
8 that I will request.

9 Ms. Carwile, is there any public
10 comments?

11 MS. CARWILE: If you'd like to make a
12 comment at this time, this is on Agenda Item
13 Number 10. Please raise your hand using the
14 raised-hand feature or by pressing star-nine if
15 you're joining us by phone. This is for Agenda Item
16 Number 10.

17 Madam Chair, I'm not seeing any hands
18 raised at this time.

19 CHAIR URBAN: Thank you, Ms. Carwile.
20 Thank you both again for the very helpful
21 presentation and the thoughtful care in amending the
22 regulations so that the regulated industry is able to
23 easily follow them and they reflect the Delete Act.

24 May I have the motion as stated? Thank
25 you. I have a motion from Board Member Hamer.

1 May I have a second?

2 MS. OZER: Second.

3 CHAIR URBAN: Thank you. I have a second
4 from Board Member Ozer. The motion is on the table
5 with a motion by Board Member Hamer and a second by a
6 Board Member Ozer. We've been through a lot of
7 agenda items today.

8 Ms. Carwile, could you please conduct the
9 roll call vote?

10 MS. CARWILE: Yes. This is a roll call
11 for the motion, as stated by the Chair.

12 Board Member Hamer?

13 MS. HAMER: Aye.

14 MS. CARWILE: Board Member Liebert?

15 MR. LIEBERT: Aye.

16 MS. CARWILE: Board Member Mactaggart?
17 Board Member Ozer?

18 MS. OZER: Aye.

19 MS. CARWILE: Chair Urban.

20 CHAIR URBAN: Aye.

21 MS. CARWILE: Madam Chair, you have four
22 yeses and one not voting.

23 CHAIR URBAN: Thank you very much. The
24 motion carries by a vote of five to zero. Again,
25 thank you, everyone. And thank you to the Board for

1 your attention to this matter.

2 We will now move to Agenda Item
3 Number 11.

4 Yes. I'm sorry? Board Member Ozer
5 brought to my attention that I misspoke. The motion
6 has been approved by a vote of four to zero. Thank
7 you very much, Board Member Ozer.

8 And we will now move to Agenda Item
9 Number 11. Agenda Item Number 11 is our very first
10 audit division update. The citizen initiative that
11 created the Agency includes an innovative
12 requirements, the Board appoint a chief privacy
13 auditor, which is a role that has had to be defined
14 and created and has very wonderfully been filled by
15 Ms. Sabrina Boyson Ross. Excuse me, Boyson Ross.
16 Who is our chief privacy auditor and the first one I
17 know of in the United States. Delighted to welcome
18 her for her first annual update.

19 Please go ahead when you're ready, Ms.
20 Ross.

21 It's all right. We'll wait for the
22 technical system to catch up.

23 MS. ROSS: Can you hear me now?

24 CHAIR URBAN: We can. Thank you everyone
25 for bearing with us while we get the slides up.

1 We'll be back in five minutes.

2 (Whereupon, a short recess was
3 taken.)

4 CHAIR URBAN: Thanks everyone for
5 waiting. We have slides. And so we are back in --
6 we are back from our short break with Item Number 12,
7 which is -- excuse me, Item Number 11, which is the
8 audit division first annual update, as I mentioned
9 earlier, presented by Ms. Ross, our chief privacy
10 auditor.

11 Please go ahead.

12 MS. ROSS: Thank you, Chair Urban and
13 members of the board. I'm Sabrina Ross, the Agency's
14 first Chief Privacy Auditor. As Chair Urban said,
15 I'm very happy to provide the board with an update
16 today for our division. This update will proceed in
17 three parts, if I can advance the slide. First, I'll
18 talk a bit about the Audits Division's overall
19 approach to building an effective division. Next,
20 part two, will address more specifically what we've
21 done to build a portion of that infrastructure, and
22 some of the work that's public that we're currently
23 undertaking. And our third section will address the
24 next steps, and sort of where we're going after this.
25 You'll see high-level slides next to me serving as a

1 guide to our topics.

2 Before I step into the substance of the
3 day, I can share just a little bit about my
4 background and the lens that I bring to building the
5 audit function for Cal Privacy. I spent more than 15
6 years in the private sector, first at law firms,
7 counseling on privacy across tech, health, finance,
8 and other sectors, and then I went in-house at tech
9 companies like Apple, Uber, and Meta. So I've seen
10 how privacy is approached at a wide range of
11 regulated entities. In these roles, I helped build
12 and lead privacy compliance programs, advised product
13 and engineering teams, responded to regulatory
14 investigations, and developed governance frameworks
15 for emerging technologies, including artificial
16 intelligence. Across each of these roles, I focused
17 on ensuring that complex organizations translated
18 legal requirements, and in some instances public
19 expectations, into operational reality.

20 That experience gives me a perspective
21 that's particularly valuable for this role. I
22 understand how privacy programs are designed, how
23 technical controls are implemented, how evidence of
24 compliance is generated, and where privacy
25 implementation can succeed or fall short. As we

1 build California's audit function, my goal is to
2 apply that practical understanding to create an audit
3 program that is rigorous, technical, fair, and
4 efficient. I'm honored to be here, building a
5 function that will serve California consumers as well
6 as regulated entities. And I would be remiss not to
7 mention that I'm joined here today by some of our
8 audits technologists, Tina Young and Mohammad Dawoud,
9 as well as our auditor, Joe Kalinacao, as well as by
10 our summer intern, Misha Oreskov.

11 So to begin at the beginning, I want to
12 talk a little bit about our statutory authority.
13 Here it says that the Agency shall appoint a chief
14 privacy auditor to conduct audits. So this was sort
15 of written into the law. The implementing regulation
16 gives us broad authority to conduct audits, including
17 of a business, service provider, contractor, or
18 person, to ensure compliance with any provision of
19 the CCPA. It gives us broad criteria for selection,
20 as well as provides for what happens if entities are
21 non-cooperative, so the availability of subpoenas or
22 warrants.

23 So to situate my division in global
24 context, I'll talk just for a minute about what I
25 found around the world, in terms of how audit

1 functions. I want to set the table, in particular,
2 on one of the most common questions I get, which
3 concerns the difference between audits and
4 enforcement. Many, many regulators have both
5 enforcement and audit functions. To take just one
6 example from this slide, the SEC calls their audit
7 function the Examinations Division, and they write,
8 quote, that they use risk-focused strategies to
9 improve industry practices and compliance, prevent
10 fraud, monitor risk, and inform policy. Many other
11 entities leverage a similar distinction, where, for
12 example, the Defense Contract Audit function audits
13 defense spending, and a separate arm enforces when
14 there are problems. It's also common, as this group
15 knows, in parts of Asia and Europe, to have an audit
16 function within privacy regulatory agencies.

17 As with many regulatory bodies that have
18 separate audit and enforcement functions, enforcement
19 is generally focused on investigating violations, and
20 can take a wide variety of measures where violations
21 are found, from imposing fines to mandating
22 corrective actions. Audit functions tend to examine
23 more proactively across a broader swath of regulated
24 entities, to see the state of compliance broadly.
25 There is, of course, some commonality. Auditors also

1 mandate corrective action. But audits would not
2 typically be pursuing fines or litigating. I'll talk
3 more about this when I discuss the details of our
4 strategic approach. In general, I find the common
5 themes in privacy audit units globally include
6 dedicated technical capacity, proactive risk-based
7 targeting, and a willingness to go beyond paper
8 review to test real-world compliance. So we've
9 considered all of these functions and endeavored to
10 build the best of some of those learnings into the
11 Cal Privacy Audit program.

12 Put most simply, my division seeks to
13 increase the regulated entities' voluntary compliance
14 through proactive engagement and structured review.
15 The Audits Division is designed to depart from a
16 traditional reactive compliance review model. This
17 is one where there's a static approach, and sort of
18 formulaic audits. Rather, we will tend to pursue a
19 risk- and harm-based approach, which is calibrated to
20 detect real-world failures in statutory rights. Our
21 division will frequently examine mechanisms across a
22 sector or industry for compliance, because these
23 sectoral audits are an important opportunity to
24 identify best practices, discover risks and
25 vulnerabilities. They may not have come to light

1 through legislative input or consumer complaints.
2 And then we can publish reporting that can inform the
3 public, in addition to separately arriving at
4 remediation agreements with individual companies. I
5 talked a bit about how our division is primarily
6 comprised of auditors, research technologists, and,
7 of course, interns. And we will hopefully grow over
8 time.

9 So let me talk a bit about actually the
10 building blocks for a new division, because, as Chair
11 Urban mentioned, I joined about six months ago. So
12 I've spent my first few months really profoundly
13 focused on how to build an effective division, and
14 get the right infrastructure in place. The two key
15 components for me were building a world-class team,
16 with leaders experienced in running multiple complex
17 audits simultaneously, and technologist-first in
18 technical testing, to support robust compliance
19 understanding. The second primary piece was really
20 on technical and policy infrastructure -- so the
21 procedures, tools, and systems we need to run
22 concurrently -- running multi-track audits, and to
23 build, of course, for future needs, such as in
24 cybersecurity. This is everything from, you know, a
25 document review platform, so we can receive

1 productions from audited entities, to obtaining the
2 technical testing tools that we need.

3 That takes us to part two, which is a
4 little bit about the public -- the work that's public
5 that we currently have underway. Last month, we
6 announced that we had begun a gig economy sectoral
7 audit. This audit examines whether consumers,
8 including gig workers, are meaningfully able to
9 exercise their legal right to know what data is being
10 collected about them, how it is being used, and with
11 whom it is being shared. The CCPA guarantees
12 California consumers, including employees, job
13 applicants, and independent contractors, the right to
14 know what personal information a business has
15 collected about them, the categories and specific
16 aspects of that information, the purpose for which it
17 is used, and the parties with whom it is shared. As
18 these are enforceable legal rights, and businesses
19 are required to honor access requests accurately and
20 completely within specified time frames. Moreover,
21 meaningful access to one's personal information is
22 often the precondition for exercising any other
23 privacy right, such as knowing that one's data needs
24 to be corrected or deleted.

25 That audit announcement has generated

1 significant attention, including, yesterday, Politico
2 covered engagement from former senior leaders at the
3 FTC and CFPB, now at Columbia's Law School Center for
4 Law and the Economy, who endorsed the audit as an
5 important step in worker privacy, and suggested that
6 our approach could become a model for other
7 regulators. While there is clearly strong interest
8 in the specific focus of this audit, the response
9 also reflects a broader recognition that proactive
10 audits are an increasingly important tool for
11 effective oversight. From the oversight of privacy,
12 to AI, to supervision of student loan servicers,
13 regulators are increasingly investing in dedicated
14 audit functions, because they provide a systematic
15 way to identify risk and drive improvements.

16 This week, we also published the first in
17 a series of Audits Division requests for technical
18 input. This is a series really primarily aimed at
19 the technical community, to signal areas of relevant
20 research that would support the development of future
21 compliance inquiry and audit methodologies that Cal
22 Privacy and other regulators could leverage. The
23 first in this series is focused on emerging
24 technology, inference, and identifiability. And I
25 invited researchers across multiple fields --

1 privacy, AI, machine learning, law -- to engage on a
2 couple of questions. In particular, we were focused
3 on developing methods for detecting and measuring
4 inferences, advancing techniques for evaluating and
5 mitigating re-identification risk, and exploring how
6 legal concepts can be operationalized in real-world
7 systems.

8 So, finally, looking ahead to 2027 and
9 beyond, I'll speak briefly to three areas of public
10 work that we're engaged on. The first is preparing
11 for ADMT audits. ADMT comes into scope for audits in
12 January 2027, so we have hired technologists with
13 relevant expertise and begun scoping our approach to
14 audits in this area. Second, we will be working on
15 building the risk assessment and cyber submission
16 portal, in partnership with Cal Privacy's phenomenal
17 IT team, who brought you DROP, who you heard from
18 earlier today. So we'll build out the website
19 functionality to receive cybersecurity certifications
20 and risk assessments. And third, we're focused on
21 structured engagement, because stakeholder engagement
22 increases the division's visibility, promotes
23 voluntary compliance, and deters violations, as
24 regulated entities recognize active agency oversight,
25 and awareness of how our process differs from

1 enforcement. We'd like to invest in some of the most
2 important places. This includes, in addition to
3 privacy conferences, ensuring that we're engaging
4 deeply with cybersecurity audiences, as well as ADMT
5 ones, where we're hearing a lot of appetite for more
6 engagement.

7 Before I hand it over to you for
8 questions, I put up on the slide a few of the key
9 upcoming compliance dates thereafter. So, following
10 the January 2027 ADMT, we see the phase-in of the
11 requirement for first risk assessments and
12 cybersecurity certifications, with the largest
13 businesses by revenue beginning in April 2028, and
14 smaller companies in subsequent years thereafter.
15 That certification must be completed by a member of
16 the business's executive management team who has
17 direct responsibility for their cyber compliance.
18 And then, when the Audits Division wants to request
19 underlying documentation, so for example the
20 cybersecurity audit that underlies the certification
21 they submit, businesses have 30 calendar days to
22 submit those underlying documents, whether it's the
23 risk assessment reports, or the cybersecurity audits,
24 to us.

25 With that, I'm happy to take questions

1 from the Board. And I look forward to receiving the
2 Board's feedback. Thank you for the opportunity to
3 speak today.

4 CHAIR URBAN: Thank you very much, Ms.
5 Ross. And thank you for that exciting update. And I
6 think a very well used six months. I'd like to add
7 to the general approbation you've received in the
8 press, for example, about the choice for the first
9 announced audit sector. I'd like to add a reason to
10 that, which is that I'm very pleased that the audit
11 is responsive to public input and comment and concern
12 that we garnered through the ADMT risk assessment and
13 cybersecurity audit regulatory process. We heard a
14 lot from gig workers. We also heard from labor
15 organizations and other labor organizers, and that
16 those are inputs that I think it's very important to
17 take into the Agency, all inputs from public comment,
18 whether or not we can directly reflect them or how
19 much we can directly reflect them in the regulations
20 we're considering at the time that. Those inputs are
21 something that is actioned by the Agency. And this
22 is something that I think is a really important step.
23 So greatly appreciate that. And I think that your
24 approach with the example of some of the European
25 agencies, for example, to help guide what best

1 practices would be seems like an excellent approach
2 that hopefully will help shed light on practices and
3 help businesses straightforwardly and fully comply.

4 I do have one question, which is for the
5 publicly announced audit, what is the output? Is it
6 an output that goes into -- over to enforcement and
7 they decide what to do with it? Is it an output that
8 might have a public component or something else?

9 MS. ROSS: Yeah. Thank you, Chair Urban.

10 So I envision that typically will have
11 two primary types of output. One will be directly
12 with audited entities, which is a report documenting
13 our findings and identifying the applicable
14 remediation where remediations are appropriate. The
15 second would be, as you alluded to, a public report
16 that's really sectoral in nature and talks more
17 broadly, not a sort of company by company findings,
18 but what we found across the sector trends, strong
19 practices we identified, as well as areas where there
20 were frequent needs for, for corrections.

21 CHAIR URBAN: Thank you. Comments,
22 questions?

23 Board Member Hamer?

24 MS. HAMER: First of all, I'm very
25 excited that you're here with your particular

1 background. So welcome and thank you.

2 MS. ROSS: Thank you.

3 MS. HAMER: And I'm particularly
4 interested in the emerging technology space. Because
5 I think a lot of our work has been focused on a
6 little bit older technology. And so I'm curious
7 where recording facial recognition, AI's effect on
8 privacy and how people -- companies are using that,
9 fits into your roadmap.

10 MS. ROSS: Yes. I keep telling people
11 that this is the -- I've done privacy sort of law and
12 policy and auditing for like 20 years now, and this
13 is the most intense period of technological change
14 I've ever seen. And it feels like an incredible gift
15 to be at this agency at this time. So I -- broadly,
16 I would say that we're focused there. Because I
17 think that everything around how privacy gets
18 operationalized, a lot of that is changing. You
19 know, as we heard yesterday in the informational
20 session, sort of the powerful kind of inflection
21 points around privacy control may also be changing.
22 So we want to make sure that our audits can be a
23 productive force that sort of sheds light on the
24 import to user privacy and whether interventions
25 might need to change.

1 MS. HAMER: Okay. Thank you. Are you
2 prepared to take on glasses?

3 MS. ROSS: Thank you for the question.

4 CHAIR URBAN: Licensed plate readers? I
5 think the public has already got a lot to say about
6 that one. Other comments, questions from the Board?
7 Board Member Liebert.

8 MR. LIEBERT: I'm curious about the
9 interplay between the audit process that we have and
10 the enforcement process that we have. And I know
11 that audits can serve the function of being marvelous
12 proactive mechanisms to help businesses comply. And
13 at the same time, they also can expose inadequate
14 practices that could lead to enforcement actions and
15 how that interplay works as you're developing this
16 process.

17 MS. ROSS: Yes. Thank you, Board Member
18 Liebert. We want audits to proceed as a
19 collaborative process. So I think, at the outset,
20 our orientation will be that we are endeavoring to
21 tailor requests narrowly, and just kind of come
22 efficiently to a shared understanding of the facts.
23 That said, there are a few places where I would see
24 it could -- enforcement would become involved. One
25 is where a company isn't participating and isn't

1 cooperating, and as I referenced right at the
2 beginning, I think there we would use subpoena
3 authority, and work with enforcement, to ensure that
4 they're complying. I think there's another scenario
5 where, let's say, one of the audited entities is
6 largely not complying, and not endeavoring to comply,
7 with core features of the law. I think there would
8 be instances where we would say this is more
9 appropriately in the realm of enforcement.

10 CHAIR URBAN: Board Member Ozer?

11 MS. OZER: Mine's a little bit of a
12 follow-through. Number one, just really amazing work
13 in the six months. I mean, again, you know, standing
14 up sort of a whole another section of our work. And
15 the second is just sort of building on what Board
16 Member Liebert was asking about in terms of the
17 intersection with enforcement. I'm wondering, sort
18 of intersection with, you know, legislative vehicles
19 as well. Because obviously, the legislature has a
20 timeframe, whereby they think about new bills, they
21 think about interventions. And so I just wondered
22 sort of how we're thinking about that holistically as
23 well, where there could be sort of things that come
24 up in an audit that could inform the need to do or,
25 or a potential for a legislative fix as well.

1 MS. ROSS: Yes. Board Member Ozer, I'm
2 so glad that you asked that question. Because when I
3 talked to chief privacy auditors in other countries,
4 they did talk about serving that function as well.
5 And there was almost a sense that there are some
6 audits that will be run around black letter law,
7 where it's just like black and white. Are companies
8 complying or not? But there are others where it is
9 in fact, there are complexities, and informing the
10 public or the legislature around complex areas is a
11 core part of the task. And so for that, you know,
12 being mindful of, you know, timelines. How long does
13 an audit take, and at what point we'll be ready to
14 share findings that are useful.

15 CHAIR URBAN: Thank you board members.
16 If there are no additional comments or questions, Ms.
17 Carwile is there public comment?

18 MS. CARWILE: This is for Agenda Item
19 Number 11, Audits Division's First Annual Update. If
20 you'd like to make a comment at this time, please
21 raise your hand using the raised-hand feature or by
22 pressing star-nine if you're joining us by phone.
23 This is for Agenda Item Number 11.

24 Madam Chair, I'm not seeing any hands
25 raised at this time.

1 CHAIR URBAN: Thank you, Ms. Carwile.

2 Thank you and again, welcome, officially
3 and publicly, Ms. Ross. It is wonderful to have you
4 and your team here, and we look forward to all the
5 great things that you're doing and will continue to
6 do.

7 With that, let's actually go ahead and
8 move to Agenda Item Number 12, which is the
9 legislative update and authorization of Agency
10 positions on pending legislation. This item will be
11 presented -- I feel as though we see you so often and
12 the public see you so often, Ms. Mahoney, that I do
13 not have to let everyone know who you are. But this
14 item will be presented by Maureen Mahoney, our deputy
15 director of policy and legislation.

16 Please go ahead when you're ready.

17 MS. MAHONEY: Thank you Chairperson Urban
18 and Board Members. Really appreciate this
19 opportunity to provide an update on our legislative
20 work. And as always, I want to thank my team, Jala
21 Deblac and Elliott Sangara, for their key
22 contributions.

23 And for this item, first, as I usually
24 do, I'll provide an update on our engagement at the
25 federal level. Then I'll move to go over, at a very

1 high level, some of the privacy and Delete-style
2 bills that we're seeing in states across the country.
3 Then we'll turn to California, where we'll spend the
4 most time. I'll give a brief update on our remaining
5 Cal-Privacy-sponsored bill. I'll provide an update
6 on the bills that Cal Privacy is supporting, and
7 those that we're watching. And then, at the end,
8 I'll present for Board consideration a recommended
9 position on one bill that directly affects the
10 Agency, that has to do with publicly available
11 information. After each of these sections, I'll
12 pause for comments and feedback from the board. Feel
13 free to stop me at any time. And I'm going to try to
14 keep this presentation to a reasonable 20 to 25
15 minutes.

16 First, I'll turn to our engagement at the
17 federal level. So, as you know, earlier this year,
18 in April, the House Energy and Commerce Committee
19 introduced a federal comprehensive consumer privacy
20 bill, the Secure Data Act, which the Agency is
21 opposing, because the bill is substantially weaker
22 than the protections that Californians currently
23 enjoy, and the bill incorporates a broad provision
24 seeking to preempt any state law that relates to the
25 provisions of the act. There was a subcommittee

1 hearing on the bill in early June, but the bill has
2 not been voted out of subcommittee for further
3 consideration by the full committee, and the House is
4 in recess until the fall. We've been actively
5 engaged in opposition to the bill. We submitted our
6 own opposition letter, we joined with 17 other state
7 privacy authorities in a coalition opposition letter
8 that was led by the California Attorney General's
9 Office. Staff have traveled to D.C. three times
10 since November to meet with legislators and
11 congressional staff, talking about this bill and the
12 potential for it, including, most recently, Executive
13 Director Kemp visited in May, and we have ongoing
14 communication with staff, members of the California
15 delegation, and other allies, to continue to push
16 back against the bill.

17 To moving to the KIDS Act, where we are
18 seeing the most activities regarding kids privacy and
19 online safety. So, in late June, the House of
20 Representatives passed the Kids Internet and Digital
21 Safety Act, or KIDS Act, and that's an omnibus bill
22 that incorporates, you know, many different bills
23 that they put into one. Importantly, the bill
24 incorporates a provision covering each section, that
25 explicitly allows states to adopt stronger

1 protections. The package includes the House's
2 version of COPPA 2.0, you know, which expands the
3 opt-in consent requirement for data collection, to
4 kids under 18, prohibits targeted advertising to
5 minors. The KIDS Act also includes the House's
6 version of the Kids Online Safety Act, or KOSA, which
7 requires design features and safeguards to protect
8 minors online, and a data broker registry for data
9 brokers that collect and sell children's personal
10 information.

11 So now, turning to the Senate. I'll note
12 here that -- as we mentioned at the last meeting, I
13 believe -- the Senate passed their own version of
14 COPPA 2.0 earlier this year. It also has a provision
15 that explicitly allows states to adopt stronger
16 protections. So the House and Senate would have to
17 come to some sort of agreement, but both houses have
18 passed similar versions of the bill, so we may see
19 progress there. The big news of the past week has
20 been the Senate Commerce Committee markup of a
21 separate set of kids' online safety legislation. The
22 slides are a bit outdated. It's been a very evolving
23 issue since we submitted the slides in July. The
24 markup was held on Wednesday. It solely covered
25 kids' online safety legislation. There was talk that

1 it may include AI, but they did not include AI.
2 Although something on AI may develop later this year.
3 At the markup, several bills were voted out of
4 committee. Of note was the Senate version of the
5 Kids Online Safety Act, that included a duty of care,
6 which was not in the House version, and that seems to
7 be kind of a sticking point, and then a couple of AI
8 chatbot bills, all of which explicitly allow states
9 to adopt stronger protections. So that's the federal
10 bill update.

11 I'd also like to flag that Senator Wyden
12 sent a letter to Chairperson Urban and several state
13 attorneys general in the last week, calling on us to
14 do more to encourage businesses to honor global
15 privacy signals, specifically by releasing guidance
16 clarifying that we expect companies to respect these
17 signals regardless of the resident's physical
18 location or IP address, and asking us to establish a
19 bipartisan multistate task force to focus on GPC
20 compliance and enforcement. So, as you know, making
21 privacy rights accessible is a top priority for Cal
22 Privacy, and we've partnered with other state privacy
23 authorities to ensure that businesses comply with GPC
24 requirements, and very, very much appreciate the
25 attention to this issue. That is the federal update.

1 So next, I'd like to do a high-level
2 overview of what we're seeing at the state level
3 across the country. As you know, the statute directs
4 us to work with authorities in other jurisdictions to
5 work towards consistency on privacy protections where
6 possible. So we monitor privacy legislation across
7 the country and engage where appropriate. Most
8 states have wrapped up their legislative sessions
9 already, so we have a pretty good sense of where
10 things are for the year. Four states this year have
11 enacted comprehensive consumer privacy laws:
12 Alabama, Louisiana, Oklahoma, and Vermont. I think I
13 mentioned Alabama and Oklahoma at the last meeting.
14 So now the total number of states with a
15 comprehensive consumer privacy law is about two
16 dozen. Alabama and Oklahoma, you know, weaker than
17 the CCPA. They don't require tools that make it
18 easier for consumers to exercise their rights,
19 neither of them requires businesses to honor opt-out
20 preference signals. Louisiana and Vermont, while not
21 exactly the same, a little bit more closely aligned
22 with CCPA. For example, both of them require
23 businesses to honor opt-out preference signals,
24 prohibit the use of dark patterns. Vermont actually
25 has a pretty narrow definition of publicly available

1 information.

2 And there are still states where bills
3 are still pending. Some states have year-round
4 legislative sessions. Among them, both Massachusetts
5 and Pennsylvania are pretty close to the finish line.
6 And then another trend has been amendments to
7 comprehensive consumer privacy laws, specifically
8 prohibitions on the sale of certain types of data.
9 So Connecticut and Virginia have both prohibited the
10 sale of geolocation data. New Hampshire has
11 prohibited the sale of the data of children under 13.
12 And New Jersey recently enacted a prohibition on the
13 sale of sensitive data as a category.

14 Delete-style bills were also popular this
15 year. Eight states considered Delete-style bills.
16 Of those, Connecticut passed one, which we're really
17 excited about. Vermont already has a data broker
18 registry, but they're going to require the Secretary
19 of State to do a study on the feasibility of a
20 Delete-style deletion system. And then New Jersey's
21 bill that I mentioned earlier establishes a data
22 broker registry, has an explicit prohibition on the
23 sale of sensitive data by data brokers and data
24 collectors, defined as entities that collect,
25 aggregate, and sell information to data brokers. And

1 this bill also establishes varying registration fees
2 for data brokers. So those selling or licensing the
3 personal information of 4.5 million or more New
4 Jersey consumers would have fees of \$1.5 million per
5 year. And Delete legislation is still pending in New
6 York, so we're monitoring that. And then we've met
7 with each of these states to provide our support and
8 technical knowledge, and our DROP team has been
9 really generous about that.

10 And finally, I wanted to mention is the
11 Colorado AI act was fully revised this year. The
12 amended law regulates automated decision making
13 technology that materially contributes to a
14 consequential decision. It requires pre-use notice
15 and an adverse decision process that includes a human
16 review option. And some of the more controversial
17 provisions of the law, such as requiring assessments
18 for discriminatory algorithms, have been removed. So
19 I'll pause here before I move on to the California
20 update.

21 Okay. Moving along to California bills
22 in terms of where we are on the sessions, long story
23 short, the session is almost over. Bills have to
24 make it out of the legislature by the end of August,
25 and then the governor will have until September 30th

1 to sign or veto the bills. And then again, for this
2 section, I'll provide an update on our sponsored --
3 remaining sponsored bill. I'll provide an update on
4 our support bills, we'll go through our watch bills
5 as quickly as possible, and then finally present SB
6 435 for consideration.

7 MS. OZER: And Chair Urban, I have a
8 recusal in this section.

9 CHAIR URBAN: Yes. I was planting to do
10 that right after the presentation, yes.

11 MS. MAHONEY: Okay. I wanted to start
12 with an update on the sponsored bill, SB 923, from
13 Senator Becker, the Expanding Privacy Rights Act.
14 This bill amends the CCPA to do two things. It
15 expands the CCPA's right to delete to cover
16 information collected about consumers, rather than
17 collected directly from them. So it would cover, by
18 the CCPA, information collected indirectly about
19 consumers. Additionally, the bill requires
20 online-only businesses to provide an online method,
21 such as a web form, for submitting privacy requests
22 like request to access, delete, and correct
23 information. Currently, those businesses are only
24 required to provide an email address, which is not as
25 consumer-friendly.

1 So we think the changes will make the
2 rights granted under the CCPA much more accessible.
3 We're pleased with the progress of the bill so far.
4 California has some of the strongest privacy rights
5 in the nation, but nearly every state has a more
6 expansive right to delete than California, and this
7 would enable us to align with the strongest state
8 protections currently in effect with respect to
9 deletion. So this bill is in Assembly
10 Appropriations. We'll find out next week if it
11 advances out of that committee.

12 Next, our other supported bills. You
13 know, we're really excited about the list of bills we
14 have here. We think together they provide a
15 significant step forward for California's privacy.
16 First, supporting AB 542, from Assembly Member Ward,
17 to amend the CCPA to prohibit the sale and sharing of
18 sensitive personal information. This bill is
19 currently in Senate Appropriations, as are most of
20 these bills. Also supporting AB 322, from Assembly
21 Member Ward. This is a two-year bill, it was
22 introduced in 2025, it was held in Senate
23 Appropriations last year, but it's eligible to move
24 forward this year. It amends the CCPA to provide
25 additional restrictions on the processing of

1 geolocation data, and prohibits the sale of such
2 data. This bill is currently in Appropriations.
3 We'd expect to see some amendments to this bill in
4 order to move it forward.

5 Next, we are also supporting AB 883, from
6 Assembly Member Lowenthal. This bill amends the
7 Delete Act. It previously required Cal Privacy to
8 develop an expedited process for DROP requests for
9 elected officials and judges. The Agency had a
10 support-if-amended position on the bill, reflecting
11 support of the goals of the bill but some concerns
12 about implementation. The bill was amended, and
13 currently requires the Secretary of State and
14 Judicial Council to notify elected officials and
15 judges about DROP, and tasks our agency with creating
16 educational materials to support that notification.
17 The bill also amends the Delete Act to require data
18 brokers to process deletion requests in 30 days
19 rather than 45 days. It creates a new private right
20 of action. It specifies that elected officials and
21 judges, agency counsel, or city attorney can bring a
22 civil action against a data broker for violations
23 with respect to the personal information for that
24 judge or official. Since these amendments address
25 the Agency's earlier concerns about the bill with

1 respect to implementation, Cal Privacy now has a
2 support position on the bill, and it's currently in
3 Senate Appropriations.

4 And then, finally, for this slide, two
5 bills that the Agency previously had positions for,
6 their concepts were folded into AB 883, and then got
7 amended, and no longer implicate the Agency. So we
8 don't have a position on those anymore. Those are
9 AB 302, from Assembly Member Bauer-Kahan, which
10 initially had kind of the core concept of AB 883, and
11 that was moved into the 883 vehicle, and then SB
12 1106, from Senator Caballero, that had the concept of
13 moving deletion from 45 days to 30, and that was put
14 into AB 883.

15 Let's see. So turning now to the bills
16 that we've been watching. So this includes a
17 selection of the privacy and tech bills that we've
18 been monitoring. These typically do not affect the
19 Agency. We have provided technical assistance on
20 some of these to ensure consistency and workability.
21 Since I went through the watch bills at the last
22 meeting, for the sake of time I'm only going to go
23 over the bills that I didn't mention last time, or
24 there have been significant developments. And as
25 part of the request from board members Liebert and

1 Ozer at the last meeting, I'm going to mention the
2 enforcement mechanisms in these bills. And then a
3 few bills we're watching already died this year. For
4 the sake of time, I'm just going to refer to the
5 slide. Feel free to stop me with any questions.

6 Okay, so on to the watch bills that are
7 still moving. First, I'll look at the kids' bills.
8 I'm just going to focus on AB 1709. That's probably
9 one of the most closely watched bills. That's from
10 Assembly Member Lowenthal and a coalition of authors.
11 It prohibits social media companies from providing
12 addictive features, such as addictive feeds, to
13 minors under 16, and it establishes an e-safety
14 advisory commission that would be housed within the
15 Department of justice, to advise the AG on a wide
16 range of issues relating to kids' online safety,
17 including age verification. The bill is enforced by
18 civil action brought by the AG or a local public
19 prosecutor, and that is in Appropriations.

20 Let's see. Moving on to a few of the
21 Assembly bills that we've been watching. First is AB
22 311, from Assembly Member McKinnor. This was a
23 gut-and-amend in June. Now allows consumers to opt
24 into having telematics, or the use of tracking
25 technologies that analyze driving data, to be used in

1 setting insurance rates, and establishes privacy
2 protections regarding the use and disclosure of this
3 data. It would be enforced under the Insurance Code.
4 Folks can file complaints with the Insurance
5 Commissioner, who can hold hearings and review, to
6 impose civil penalties, corrective orders, etc. In
7 our view, this bill would not impact the CCPA,
8 because per Proposition 24, the Insurance
9 Commissioner has jurisdiction over insurance rates
10 and pricing. So it's for this reason that staff did
11 not recommend taking a position on the bill. The
12 Department of Insurance has an opposing,
13 unless-amended, position when it was considered in
14 policy committee. The bill is currently with Senate
15 Appropriations.

16 I also wanted to mention AB 1018, from
17 Assembly Member Bauer-Kahan, because I didn't mention
18 it last time. This was introduced in 2025. It
19 regulates automated decision systems used for
20 consequential decisions. It was placed on the
21 inactive file at the end of last year, but it could
22 become active this session. And this bill governs a
23 greater scope of decisions than those addressed by
24 our ADMT regulations. So it kind of fits within
25 that. And enforcement would be by civil action

1 brought by a number of entities, including the
2 Attorney General, a district attorney or county
3 counsel, city prosecutors, Civil Rights Division, or
4 the Labor Commissioner with respect to employment
5 decisions.

6 I also wanted to mention AB 1979, from
7 Assembly Member Bonta. This bill regulates the use
8 of chatbots for health care services. It amends the
9 Confidentiality of Medical Information Act to cover
10 businesses that provide health care chatbots. And it
11 separately amends the Health and Safety Code to
12 require a health facility to take reasonable steps to
13 ensure that a health care professional retains the
14 ability to use their independent professional
15 judgment in their care, when that care is informed by
16 a clinical decision support system. In terms of
17 enforcement, the CMIA requirements would be enforced
18 as a CMIA private right of action for individuals
19 whose medical information had been negligently
20 released, and the AG and a number of other
21 authorities can enforce as well. In staff's view,
22 there's no conflict with respect to the CCPA with
23 either of these provisions.

24 Let's see. And next, turning to Senate
25 bills. So first would be SB 354, from Senator Leone.

1 This is a two-year bill, was introduced last year.
2 Establishes new privacy regulations for insurance
3 entities, amends the Insurance Information and
4 Privacy Protection Act, or IIPA. I've mentioned it
5 before, but it's a really meaty bill, so worth
6 mentioning again. In staff's view, it generally
7 provides equal privacy protections to the CCPA.
8 Enforcement would be by the Insurance Commissioner.
9 There's also a private right of action. In terms of
10 how it intersects with our laws, as you know, the
11 CCPA directs our agency to review privacy
12 requirements established by the Insurance Code, and
13 develop regulations that apply greater protections,
14 except in the areas of insurance rates and pricing,
15 over which the Insurance Commissioner has
16 jurisdiction. So staff have been working with the
17 author and sponsor to ensure that it interacts
18 cleanly with the Delete Act and the CCPA, make sure
19 there aren't any gaps, and so far those have been
20 positive discussions.

21 And then SB 690, from Senator Caballero.
22 This bill was introduced in 2025 to amend the
23 California Invasion of Privacy Act, to address how
24 the prohibition on the use of pen registers and
25 trap-and-trace devices to record communications is

1 being used, with respect to lawsuits for businesses'
2 use of website tracking technologies. This bill was
3 recently amended to provide that violations related
4 to conduct occurring on websites and through
5 applications may only be brought by the Attorney
6 General, rather than through a private right of
7 action, and that would be retroactive two years, and
8 the bill's in Appropriations.

9 We're also monitoring a number of other
10 state agency bills. There's many of them still
11 pending, that establish new administrative
12 requirements for these agencies, and we've been
13 watching them closely, to make sure that we can
14 comply if and when they do go into effect.

15 CHAIR URBAN: All right. If you could
16 pause here, Ms. Mahoney, I would like to remind the
17 Board that if you have a connection to a bill or an
18 issue on which you wish to recuse yourself, this
19 would be a good time to announce that. And then we
20 know you won't take part in the conversation. And
21 should we have a vote on that item, you can respond
22 with just "recuse."

23 So are there any recusals on this item?

24 Yes, Board Member Liebert?

25 MR. LIEBERT: Yes. I'll recuse myself

1 for any vote on SB 923.

2 CHAIR URBAN: Thank you, Board Member
3 Liebert. SB 923, for discussion and vote.

4 Yes, Board Member Ozer?

5 MS. OZER: And I will recuse myself from
6 SB 435.

7 CHAIR URBAN: SB 435, Board Member Ozer.
8 All right. Seeing no more. And you can always raise
9 your hand and catch our attention, and we will
10 adjust. We will move on.

11 Thank you, Ms. Mahoney, please do go
12 ahead with the recommendation.

13 MS. MAHONEY: Okay. So moving on to
14 discuss the staff-recommended position bill, and that
15 would be SB 435. So that was introduced in 2025.
16 It's gone through a few iterations, and that's why we
17 didn't consider it at the last meeting. And now
18 amends the CCPA to narrow the exemption for publicly
19 available information. So it modifies the categories
20 included in the definition of publicly available.

21 So first, it completely strikes the
22 category, information made available by a person to
23 whom the consumer disclosed the information, if the
24 consumer has not restricted the information to a
25 specific audience. And then second, it modifies the

1 second category to remove the language that
2 conditions the category on a business's reasonable
3 belief. So these amendments, then -- what it would
4 look like if amended, publicly available would
5 include only information that is lawfully made
6 available from federal, state, or local government
7 records, and information that is lawfully made
8 available to the general public by the consumer, or
9 through widely distributed media.

10 Narrowing the definition of publicly
11 available information expands the information defined
12 as personal information, and thereby increasing
13 protections for more consumer data. These changes
14 bring the definition of publicly available more into
15 line with what consumers might expect, and centered
16 on consumer actions. And they help address the
17 privacy risks posed by the mass scraping of online
18 data, and unfettered information collection by data
19 brokers. Data brokers, as you know, regularly buy,
20 sell, and scrape from the internet information that's
21 classified as publicly available, using it to build
22 detailed profiles of individuals that are available
23 for sale to anyone, including bad actors, and
24 accessible by government agencies.

25 So for these reasons, staff recommends

1 support of the bill. And I'm happy to answer any
2 questions. That concludes my presentation. Thank
3 you.

4 CHAIR URBAN: Every time you're here, Ms.
5 Mahoney, it's like watching someone conduct a
6 symphony. And we were waiting to be sure that
7 everybody put down their bows and their instruments
8 before we clap. So thank you as ever. A fabulous
9 presentation with a lot of information efficiently
10 presented.

11 I would actually like to go back first to
12 one of the bills on which we have a support position,
13 and our position has evolved with a bill. Which is
14 the bill to provide notice and support to elected
15 officials and judges who need to delete information
16 from data brokers. I really commend staff for your
17 work on this bill. And I'm very grateful to the
18 privacy committee and the assembly and other folks in
19 the legislature for working to make this really
20 important bill something that will -- can efficiently
21 work for the people it is protecting. Threats to
22 public officials are an extremely serious issue in
23 society today. And I'm very hopeful that this bill
24 will move forward, will pass, and that we will be
25 able to garner some protection out of it for people

1 who put themselves in a vulnerable position on behalf
2 of the public every day. So thank you for your
3 continued work on that.

4 And I will ask if there are other
5 comments and questions from board members?

6 Board Member Liebert.

7 MR. LIEBERT: I just want to add to that.
8 That was an excellent, excellent result you have
9 brought to us, where we can fulfill that need while
10 at the same time, of course, not being put in a
11 position that didn't make sense. And I really like
12 that conclusion also about the Agency being the place
13 where we can provide the educational materials, which
14 is a great outcome as well. So good work.

15 CHAIR URBAN: Thank you. I have a
16 question about SB 435, which is how these changes
17 would align the CCPA's exemption with the approach
18 other states are taking. You mentioned that other
19 states often have a narrow -- more narrowly defined
20 definition of publicly available information, which
21 would mean that any exemption was narrower compared
22 to California. This would narrow California's
23 exemption and thus capture more information. --
24 excuse me -- as you so ably explained. Is this more
25 congruent with other states? Is this a matter of

1 California starting from behind but then taking the
2 lead? Or in between?

3 MS. MAHONEY: I would say that the
4 existing exemption is generally consistent with most
5 states' comprehensive privacy laws. If these
6 amendments are taken, then it would be among the
7 most, if not the most, protective framework with
8 respect to publicly available information. A couple
9 states. -- Vermont, as I mentioned, and Delaware --
10 don't have this category that the bill would
11 completely strike, this information made available by
12 a person if the consumer hasn't restricted that
13 information to a specific audience. So again,
14 Vermont and Delaware don't have that category. They
15 do have -- in that second category, they do have that
16 concept about business having a reasonable basis to
17 believe. So this would be a bit stronger than
18 Vermont and Delaware.

19 CHAIR URBAN: Okay. Thank you very much
20 additional questions or comments? Please do not take
21 our lack of questions and comments at this moment as
22 anything other than you were very comprehensive and
23 you have kept us wonderfully informed throughout the
24 legislative session. So I think we feel informed and
25 ready to decide on whether or not we would approve

1 the possible motion. Which I will state now and then
2 ask for public comment, which would be to support
3 SB 435 and to authorize staff to continue to support
4 SB 435 as stated, even if amended -- if in the
5 staff's discretion, the amendments are consistent
6 with the objectives set out in the memos distributed
7 to us in our discussion, and to authorize staff to
8 remove support for SB 435 or oppose it if amended, if
9 in staff's discretion, it's no longer consistent with
10 the objectives set out today in the materials for
11 today or our discussion for today. So that is the
12 motion that I will request.

13 Ms. Carwile, is there public comment?

14 MS. CARWILE: This is for Agenda Item
15 Number 12, Legislative Update and Authorization of
16 Agency Positions in Pending Legislation. If you'd
17 like to make a comment at this time, please raise
18 your hand using the raised-hand feature or by
19 pressing star-nine, if you're joining us by phone.
20 This is for Agenda Item Number 12.

21 Madam Chair, I'm not seeing any hands
22 raised at this time.

23 CHAIR URBAN: Thank you, Ms. Carwile. In
24 that case, could you please conduct the roll call
25 vote? Oh, I apologize. It may be time for lunch.

1 May I have the motion as stated.

2 MS. HAMER: So moved.

3 CHAIR URBAN: Thank you. I have a motion
4 from a Board Member Hamer.

5 May I have a second?

6 MR. LIEBERT: 435; right?

7 CHAIR URBAN: Yes, for 435.

8 MR. LIEBERT: Second.

9 CHAIR URBAN: Thank you. I have a motion
10 from Board Member Hamer and a second from Board
11 Member Liebert.

12 Now, Ms. Carwile, could you please
13 conduct the roll call vote.

14 MS. CARWILE: Yes. This is a roll call
15 for the motion as stated by the Chair.

16 Board Member Hamer?

17 MS. HAMER: Aye.

18 MS. CARWILE: Board Member Liebert.

19 MR. LIEBERT: Aye.

20 MS. CARWILE: Board Member Mactaggart?
21 Board Member Ozer?

22 MS. OZER: Recuse.

23 MS. CARWILE: Chair Urban?

24 CHAIR URBAN: Aye.

25 MS. CARWILE: Madam chair, you have three

1 yeses, one recuse, and one nonvoting.

2 CHAIR URBAN: Thank you very much, Ms.
3 Carwile. The vote carries with a three to zero, with
4 one recusal.

5 We will now move to Agenda Item
6 Number 15. So I will recall 14 later. Agenda Item
7 Number 15 is closed session item. The Board will
8 proceed to closed session, leaving the public session
9 to discuss two matters, personnel matters, under
10 authority of Government Code Section 11126(a)(1), and
11 to confer and receive advice from legal counsel
12 regarding litigation for which disclosing the names
13 would jeopardize the Agency's ability to conclude
14 existing settlement negotiations to its advantage,
15 under authority of Government Code Section
16 11126(e)(1) and also sub 2(A). We will be gone, I
17 would say, for at least an hour, if you want to
18 stretch your legs and get some lunch yourself. And
19 we will see you back here when we return from closed
20 session. Thank you.

21 (Whereupon, a short recess was
22 taken.)

23 CHAIR URBAN: Thank you, everyone. We
24 are now returning from closed session for today's
25 August board meeting of the California Privacy

1 Protection Agency. Bear with us just a minute to be
2 clear the the slides, and we will take the next
3 agenda item.

4 So we will now turn to Agenda Item
5 Number 13, which is the item I previewed at the top
6 of the meeting today. For public comment on items
7 not on the agenda. During this item, members of the
8 public are welcome to comment on -- general comments
9 on items, including those not on the agenda. As a
10 reminder, the Board, however, may not comment on
11 these items. It may not discuss or act on any matter
12 raised during this public comment section, except to
13 decide whether to place the matter on the agenda of a
14 future meeting. Please know that the board is
15 listening, although we are not reacting, and we do
16 appreciate your comments.

17 Ms. Carwile, are there any public
18 comments on those participating remotely?

19 MS. CARWILE: This is for Agenda Item
20 Number 13, Public Comments on Items Not on the
21 Agenda. If you'd like to make a comment at this
22 time, please raise your hand using the raised-hand
23 feature or by pressing star-nine if you're joining us
24 by phone. This is for Agenda Item Number 13.

25 Madam Chair, I'm not seeing any hands

1 raise at this time.

2 CHAIR URBAN: Thank you, Ms. Carwile.
3 With that, we will turn to Agenda Item Number 14,
4 which is our agenda item to discuss future agenda
5 items. Specifically, I'm pleased as well to handle
6 this agenda item to begin. We have a number of
7 agenda items that we have on our rolling list from
8 board members and through the discussion in meetings
9 that we know are items that the Agency is considering
10 for attention.

11 So first of all, our regularized annual
12 agenda for November 6th has a set for legislation
13 item on legislation priorities and proposals, a
14 discussion of those, and the annual intergovernmental
15 affairs update and priorities. Public affairs will
16 cover the 2027 Board calendar. And legal will be
17 presenting and facilitating a conversation with the
18 Board on regulation proposals and priorities. So the
19 Board will be offering feedback and thoughts on
20 priorities for legislation and on regulations in the
21 November Board Meeting.

22 We have been, I think, valuing the
23 information sessions. And we had two others that we
24 had discussed during this item and other times on
25 reducing friction for consumer rights and on notices.

1 I also have agenda items the Board is interested in
2 from over time. I want to remind staff that Ms.
3 Hamer requested some briefing on a fourth party issue
4 that was brought up by a speaker two or three
5 meetings ago. It is an interesting puzzle that the
6 speaker brought forward. And on 5/1/2026, Ms. Hamer
7 also put on the list technical devices that record
8 and do facial recognition, for example, Meta Glasses,
9 which has also come up today. And Ms. Hamer also
10 mentioned an informational session on gen AI and its
11 impact on California residents' privacy rights, which
12 has also been threaded through the discussion
13 yesterday and today.

14 Mr. Liebert mentioned notices and
15 disclosures, which we do apparently have on the list
16 for those and also the impact of advertising models
17 on a platform. So in line with other suggestions,
18 Ms. Ozer had a question about data breach
19 notification letters and what they could include. So
20 that is on the transcript from the last meeting. And
21 I would be happy to remind staff of that if it's
22 needed, but I'm sure that you have it on your list.

23 He also requested in an information
24 session on reducing friction for exercising privacy
25 rights, which I understand is scheduled for November.

1 And then Mr. Mactaggart has a couple of items that he
2 wanted to be considered eventually for rulemaking,
3 including partial deletion and disclosures by
4 businesses disclosing clearly the impact of deleting
5 data and interested in how concretely we can provide
6 guidance to consumers.

7 So it is possible that I missed something
8 verbally, but it will be on the list. And I, myself,
9 am interested in discussion of small businesses and
10 how far the law reaches, who it covers, as well as
11 the topics that other board members have suggested.

12 Do board members have -- oh, we had a
13 couple that came up in discussion today as well. I
14 jotted them down, but I'm sure -- I can't see them
15 right now. So I expect that Mr. Laird has them.

16 Board members have additional agenda
17 items for the next board meeting or future board
18 meetings?

19 MS. HAMER: Ms. Hamer, thank you for that
20 summary. So you covered most of the notes that I had
21 with the recording and facial recognition
22 technologies that you mentioned. But then there's
23 also Flock cameras that are -- I believe are being
24 used for profiling. I would like to understand what
25 we as an agency can do about the privacy harming

1 technologies like those. And so that would be
2 interesting to me. And then also check into the
3 possibility of following, I think, Britain is
4 changing things like that to an opt-in policy to --

5 CHAIR URBAN: So understanding, building
6 understanding, and then considering potential policy
7 approaches. Okay. Thank you very much. And are you
8 thinking of some of the specific technologies or the
9 general saturation of ubiquitous surveillance or
10 both?

11 MS. HAMER: I'd say both, because one of
12 our -- I think that the way technology is moving,
13 emerging technologies are going, that we're beginning
14 to see an onslaught of privacy violations, without
15 people really paying attention to it, and it's just
16 sliding through.

17 CHAIR URBAN: Okay. Thank you, Ms.
18 Hamer.

19 Anything from you, Mr. Liebert?

20 All right, Ms. Carwile, are there any
21 agenda items suggested by the public?

22 MS. CARWILE: This is for Agenda Item
23 Number 14, Future Agenda Items. If you like to make
24 a comment at this time, please raise your hand using
25 the raised-hand feature or by using -- or by pressing

1 star-nine if you're joining us by phone. This is for
2 Agenda Item Number 14.

3 Madam Chair, I'm sure I'm not seeing any
4 hand says at this time.

5 CHAIR URBAN: Thank you very much, Ms.
6 Carwile. We covered Agenda Item Number 15, closed
7 session, already. So I will move now to Agenda Item
8 Number 16, which is adjournment, our final agenda
9 item for today.

10 I'd like to thank everyone, board
11 members, staff, members of the public for their
12 contributions to the meeting and to the Board's work.
13 We've had a very active meeting, a very
14 information-heavy meeting. And I know there was a
15 lot of work behind that to brief the Board and to
16 help us make decisions. We really appreciate that.

17 May I have a motion to adjourn the
18 meeting?

19 MS. HAMER: So moved.

20 CHAIR URBAN: Thank you. I have a motion
21 from Ms. Hamer. Do I have a second?

22 MR. LIEBERT: Absolutely not -- no.
23 Yeah. Yes. You may.

24 CHAIR URBAN: I will second the motion.
25 Thank you. I have a motion from Ms. Hamer and a

1 second from Mr. Liebert to adjourn the meeting.

2 Ms. Carwile, could you please conduct the
3 vote.

4 MS. CARWILE: Gladly? The motion is to
5 adjourn.

6 Board Member Hamer?

7 MS. HAMER: Aye.

8 MS. CARWILE: Board Member Liebert.

9 MR. LIEBERT: Aye.

10 MS. CARWILE: Board Member Mactaggart.

11 Board Member Ozer?

12 Chair Urban?

13 CHAIR URBAN: Aye.

14 MS. CARWILE: Madam Chair, you have three
15 yeses and two not voting.

16 CHAIR URBAN: Thank you very much,
17 everyone. The motion has been approved by a vote of
18 three to nothing, with two absent. This meeting of
19 the California Privacy Protection Agency Board stands
20 adjourned. Thanks very much.

21 (End of recorded audio.)

22 -000-