

Subject: CCPA Right to Know Follow - Up
Date: Tuesday, May 17, 2022 at 3:32:26 PM Pacific Daylight Time
From: Don Marti
To: Regulations
Attachments: Example CCPA workflow.pdf

WARNING: This message was sent from outside the CA Gov network. Do not open attachments unless you know the sender: [REDACTED]

Hello,

Attached is a follow-up to my previous comment about experience with CCPA Right to Know from the user point of view. I am happy to answer questions or provide additional information about this process,

Thank you,
Don Marti

Example CCPA workflow

Here is an example of the steps I have been going through to do a CCPA Right to Know.

These are all different from company to company. The company, not the user, gets to set up what the process is, and they can get pretty creative. I have found that it's usually fastest to start with an email to the company "privacy" address, and wait for them to either start the process or write back with instructions. From that point on, they're all a little different.

Saturday, 19 February 2022: initial contact

I sent the following email to privacy@wiland.com.

To whom it may concern:

Any information I provide to you may be used solely for the limited purpose of complying with the request stated in this letter.

This letter is in regard to your obligations under the California Consumer Privacy Act.

My address is

PII REDACTED

and my phone number is PII REDACTED.

According to the California Consumer Privacy Act Regulations, "If a consumer submits a request in a manner that is not one of the designated methods of submission, or is deficient in some manner unrelated to the verification process, the

business shall either: (1) Treat the request as if it had been submitted in accordance with the business's designated manner, or (2) Provide the consumer with specific directions on how to submit the request or remedy any deficiencies with the request, if applicable." If you choose the second option, please provide the required directions.

I request that you disclose to me the categories and specific pieces of personal information that your company has collected about me, as required under the CCPA.

I await your prompt response.

Sincerely,

That's my normal CCPA letter.

Tuesday, 22 February 2022: reply from company
I received a reply.

Dear Don Marti,

We received your privacy request and can help. Due to changes in legal requirements and consumer privacy processes at our company we now require consumer privacy choices to be submitted as shown on our privacy choices web portal. Please visit <http://www.wiland.com/Privacy-Choices> for more information.

Very truly,

NAME

[Wiland, Inc.]

NAME

Corporate Paralegal

That page includes a link with the text "I want to access my own personal information" which goes to a form hosted at onetrust.com.

Data Verification Document Required

To protect your data, a document confirming your name and address, signed by you and notarized in your state of residence must accompany your access request. This document can be downloaded at:

<https://wiland.com/wp-content/uploads/2019/12/WILAND-INDIVIDUAL-DATA-SUBJECT-NOTARY-FORM.pdf>

Tuesday, 22 February 2022: my question about notary fees
I know that there are hundreds of registered data brokers, and paying \$15 to get a form notarized for each one would be a lot of money, so I had to ask.

Hi NAME,

I checked the form in your link. According to the CCPA regulations,

"A business shall not require the consumer or the consumer's authorized agent to pay a fee for the verification of their request to know or request to delete. For example, a business may not require a consumer to provide a notarized affidavit to verify their identity unless the business compensates the consumer for the cost of notarization."

<https://oag.ca.gov/sites/all/files/agweb/pdfs/privacy/oal-sub-final-text-of-regs.pdf>

How should we handle the notary payment? Do you want me to get a price from the notary and you can send me a check?

Thank you for your help,

Don Marti

Tuesday, 22 February 2022: answer to my question about notary fees

And the answer is yes, they will pay me back.

Don,

Thank you for asking about notary fees. We do require a notarized data access request form when a consumer requests that we disclose the data we have on file for them, in order to protect against unauthorized access requests to your data.

Your bank or other financial institution may provide notary services for free. If you do need to pay for notary service, you will need to upload your receipt for notarization and a Federal W-9 form along with your access request form. These documents can be uploaded when you submit your data access request at <https://privacyportal-cdn.onetrust.com/dsarwebform/7567ece3-2d27-4ee0-a506-1153cb7a62b7/a1e6c0c7-b7ff-45f9-9c62-7f1eb47a6e77.html> (bottom of the page, "Select a Documentation File"). By law, notary fees in California are capped at \$15 per signature.

The data access request form is available as a hyperlink at the URL listed above. The Federal W-9 form is available here: <https://www.irs.gov/pub/irs-pdf/fw9.pdf>

Please let me know if you have any questions.

Thank you, NAME

Thursday, 17 March 2022: printed, notarized, scanned

There is a gap in the dates here. I had some other stuff going on and I did not have time to do the forms for getting paid back my \$15 for

the notary. That would have meant submitting a receipt, data broker's expense report form, and a Federal W-9 form. Eventually I decided not to do the side quest of getting reimbursed for the notary fee.

I printed out the one document that they want notarized:

Wiland
REDEFINING YOUR FUTURE
ACCELERATING THE FUTURE

INDIVIDUAL DATA SUBJECT NOTARY ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of _____ [Insert State]
County of _____ [Insert County]

A. To Be Completed By Data Subject:

A. _____ (name of Data Subject/you), certify
On _____ (insert date) I, _____ (name of Data Subject/you), certify
that I am the person who submitted a data Access request to Wiland, Inc. by inputting my
current and accurate personal information on the Wiland Privacy Choices web page or via the
Wiland toll free telephone number and certify that I am the person whose name is subscribed
within this Notary Acknowledgment Form. Below is my current and accurate full name, primary
postal address and, if provided, primary email address (Note: all information below must match
the information you provided to Wiland through the Wiland Privacy Choices web page or toll free
telephone number).

_____ (Full Name)
_____ (Address line 1)
_____ (Address line 2)
_____ (Email address - optional)

Page 1 of 2

and took it to the local notary for signature and notarization. Then I scanned it and uploaded it at the “privacy portal” site.

Got an acknowledgement that they have it.

Friday, 13 May 2022:

Received an email telling me that I can visit the “privacy portal” site for an update. Once there, I can download a PDF. It's called “WILAND DISCLOSURE: CATEGORICAL INFORMATION”.

This document starts with a page of my PII that I sent them, then a big table. The table is a bunch of categories of personal information they collect about me, and all the categories of third parties to which they sold or disclosed my personal information. Example:

CATEGORY	DESCRIPTION	COLLECTED?	CATEGORIES OF SOURCES from which Personal Information was Collected	CATEGORIES OF THIRD PARTIES to Whom Personal Information was Sold or Disclosed for a Business Purpose
Identifiers	E.g., name; alias; postal address; online identifiers; IP address; email address; account name; or similar identifiers.	YES	Publishing Product Companies; Apparel & Accessory Companies; Surveys from Consumers/Self-Reported Data; Lifestyle & Interest Product Companies; Public or Government Entities; Gift Product Companies; Data Compiling Companies; Food & Beverage Companies; Not for Profit Organizations; Business to Business Companies	Data Analytics Providers; Advertising Networks; Apparel & Accessory Companies; Lifestyle & Interest Product Companies; Service Providers; Gift Product Companies; Marketing Data Companies; Not for Profit Organizations
Characteristics of protected classifications under California or federal law	E.g., race; color; religion; sex/gender; national origin; ancestry; marital status; military or veteran status; etc.	YES	Publishing Product Companies; Apparel & Accessory Companies; Lifestyle & Interest Product Companies; Public or Government Entities; Gift Product Companies; Data Compiling Companies; Food & Beverage Companies; Not for Profit Organizations; Business to Business Companies	Data Analytics Providers; Advertising Networks; Apparel & Accessory Companies; Lifestyle & Interest Product Companies; Service Providers; Gift Product Companies; Marketing Data Companies; Not for Profit Organizations
Commercial or transactions information	E.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	YES	Publishing Product Companies; Apparel & Accessory Companies; Lifestyle & Interest Product Companies; Public or Government Entities; Gift Product Companies; Data Compiling Companies; Food & Beverage Companies; Not for Profit Organizations	Service Providers; Data Analytics Providers; Apparel & Accessory Companies; Lifestyle & Interest Product Companies

But the only actual personal information on this PDF is what I submitted on 17 March. And here is the end of the document:

If you wish to access copies of the specific pieces of personal information held about the data subject, if permitted by law, you must take additional steps. Go to <https://Wiland.com/PAR/> on or before the indicated 'Follow-Up Date' listed at the top of this document and enter the Request ID listed at the top of this document. If you submitted your original request by telephone, call the Wiland privacy contact line again to submit the Request ID by telephone.

The information contained in this document may include information about the data subject not required to be disclosed by law that Wiland has voluntarily determined to disclose pursuant to this request in the interest of transparency or data ethics considerations.

The information in this document may only be used by the data subject or the data subject's legally authorized representatives for legally-permitted, non-commercial purposes. Any other use is prohibited.

“If you wish to access copies of the specific pieces of personal information held about the data subject, if permitted by law, you must take additional steps. Go to <https://Wiland.com/PAR/> on or before the indicated 'Follow-Up Date' listed at the top of this document and enter the Request ID listed at the top of this document. If you submitted your original request by telephone, call the Wiland privacy contact line again to submit the Request ID by telephone.”

So I went ahead and did that, and here's the result.



From Privacy Team

05/13/2022, 07:52 AM PDT



MM/DD/YYYY

Hello from the Wiland Privacy Operations Team:

We have processed your recent request to access personal information, and are delivering the resulting report via the channel indicated in your request (USPS or electronic delivery).

Please monitor your electronic or physical mailbox for this document over the next several days and promptly review the report upon receipt. The report will include important instructions for you.

Current status

Now waiting on the result from filling out the form on 13 May 2022.

In my original email I did request “categories and specific pieces of personal information” so it's a little surprising that they just came back with the categories. Will update this document as I hear more.

Don Marti
