

BEFORE THE CALIFORNIA PRIVACY PROTECTION AGENCY

In the Matter of:

ROR PARTNERS, LLC

Respondent.

Case No. ENF25-245-D-RO

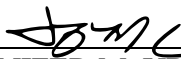
ORDER OF DECISION

The Board of the California Privacy Protection Agency hereby adopts the Stipulated Final Order, attached hereto, as its decision in the above-entitled matter.

This Decision shall become effective immediately.

IT IS SO ORDERED this 26th day of November, 2025.

BY THE BOARD:



JENNIFER M. URBAN
Chair
California Privacy Protection Agency

MICHAEL S. MACKO
Deputy Director of Enforcement
LARA KEHOE HOFFMAN
Assistant Chief Counsel
NEELOFER SHAIKH
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BEFORE THE CALIFORNIA PRIVACY PROTECTION AGENCY

In the Matter of:

ROR PARTNERS, LLC

Respondent.

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STIPULATED FINAL ORDER

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-entitled matter:

I. PARTIES

1. Complainant is the Enforcement Division of the California Privacy Protection Agency (“Agency”), which enforces the California Consumer Privacy Act of 2018 (“CCPA”), Civ. Code §§ 1798.100 – 1798.199.100, as amended, and the data broker registration obligations contained in the Delete Act, Civ. Code § 1798.99.82(c).

STIPULATED FINAL ORDER

2. Respondent ROR Partners, LLC (“ROR Partners”) is a Delaware limited liability company with its principal place of business in Las Vegas, Nevada. ROR Partners has conducted and continues to conduct business within the State of California.

II. JURISDICTION

3. Pursuant to Civil Code § 1798.99.82(c), the Agency may bring an administrative action against a data broker that fails to register with the Agency as required by law.

4. Pursuant to Government Code § 11415.60(a), the Agency may formulate and issue a decision by settlement, pursuant to an agreement of the parties, without conducting an adjudicative proceeding.

III. FACTUAL FINDINGS

A. ROR Partners Collects and Sells Personal Information

5. ROR Partners is a for-profit legal entity that provides marketing services to fitness and wellness brands.

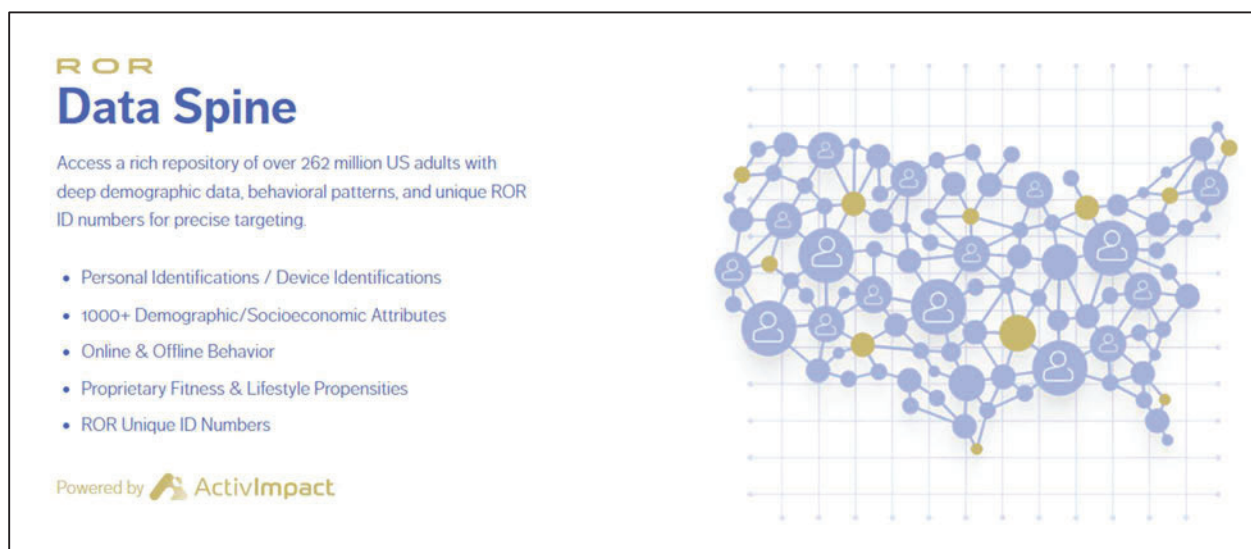
6. ROR Partners describes itself as the “#1 Fitness and Wellness Marketing Agency In North America,” with “1+ Billion Advertising Impressions Delivered Monthly,” “100+ Million Unique Individuals Reached Monthly,” and “1+ Million Marketing Attributed Conversions.”

7. ROR Partners advertises both its data ecosystem and audience modeling capabilities to potential clients, including its use of “first-party data and third-party data, AI-driven audience modeling, and predictive analytics to reach the right people—at the right time.”


8. ROR Partners collects personal information from a variety of sources, including from its clients and from third parties such as “Health and Fitness Product and Services

Companies,” “Wellness and Lifestyle Companies,” and “Data Compilers.” ROR Partners also creates inferences about consumers using other personal information that it collects.

9. ROR Partners makes available consumers’ personal information to its clients to enable precise audience targeting for marketing campaigns. For example, as pictured below, ROR Partners offers its clients the ability to “[a]ccess a rich repository of over 262 million US adults with deep demographic data, behavioral patterns, and unique ROR ID numbers for precise targeting”:

The graphic is a promotional slide for 'ROR Data Spine'. On the left, the title 'ROR Data Spine' is displayed in blue and orange. Below it, a paragraph states: 'Access a rich repository of over 262 million US adults with deep demographic data, behavioral patterns, and unique ROR ID numbers for precise targeting.' A bulleted list follows, detailing the data types: 'Personal Identifications / Device Identifications', '1000+ Demographic/Socioeconomic Attributes', 'Online & Offline Behavior', 'Proprietary Fitness & Lifestyle Propensities', and 'ROR Unique ID Numbers'. At the bottom left, it says 'Powered by ActivImpact' with a logo. On the right side of the graphic is a network diagram consisting of numerous blue circular nodes, each containing a person icon, connected by thin lines. The nodes are arranged in a shape that roughly resembles the map of the United States. The entire graphic is set against a light blue grid background.


10. Similarly, as pictured below, ROR Partners offers other services to combine clients’ information with ROR Partners’ own data. For example, it offers enhanced audience engagement by matching “personal and behavioral data to unique ROR IDs,” and uses “billions of data points” for audience modeling to “create detailed consumer profiles and AI-driven custom audiences”:



ROR
Client Data & Identity Resolution

Streamline your marketing with our automated identity resolution, matching personal and behavioral data to unique ROR IDs for enhanced prospect audience engagement.


- Personal Information
- Offline/Online Activities
- Transaction/Utilization/Referral
- Automated Identity Resolution
- Matched to ROR Unique ID Numbers


Powered by  **ActivImpact**

ROR
Audience Modeling

Utilize billions of data points in our audience modeling to create detailed consumer profiles and AI-driven custom audiences for targeted marketing strategies.

- Billions of Campaign Data Points
- Consumer Profiles & Trade Area Sensitivities
- Lifestyle Attitudinal & Behavioral Propensity Models
- Individual Channel Activity & Media Response
- AI-Driven Custom Audiences & Trade Areas

Powered by  **ActivImpact**



11. As part of its services, ROR Partners discloses inferences about consumers. For example, if you have expressed an interest in fitness activities, such as by frequently attending a health club, then ROR Partners “might place you into an ‘audience’ segment related to fitness and help health clubs in your area send you discounts or offers.”

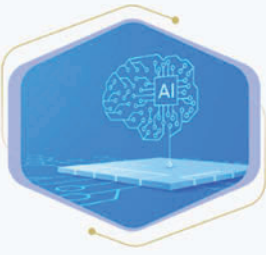
12. ROR Partners makes clear that part of its value proposition to clients is disclosing or making available personal information.

13. When explaining why its clients should choose ROR Partners as their marketing agency, ROR Partners advertises its use of “third-party data, AI-driven audience modeling, and predictive analytics” as part of its services.

14. Similarly, when explaining why clients can “[e]xperience a marketing revolution,” ROR Partners identifies precise targeting using data as a key component of its marketing approach. When describing its approach, ROR Partners cites its “Data & Digital Ecosystem,” as well as its ability to “integrate first-party data, geospatial insights, and marketing performance for precise targeting” and to target consumers utilizing “demographic precision, geospatial intelligence, and AI-driven insights”:

Why Our Approach Sets You Apart


Experience a marketing evolution with our platform, reducing waste and enhancing reach with precision targeting.



AI-Driven Solutions

Revolutionize data strategy with ROR's AI Platform: integrate first-party data, geospatial insights, and marketing performance for precise targeting.


[Learn More](#)



Data & Digital Ecosystem

Unlock growth with ROR's data ecosystem. Manage data, unify profiles, integrate CRM, and optimize marketing using real-time analytics and AI-driven insights.

[Learn More](#)



Performance Marketing

Target healthy lifestyle consumers with ROR's marketing. Utilize demographic precision, geospatial intelligence, and AI-driven insights for impactful campaigns.

[Learn More](#)

15. In addition, when describing the “power” of its services, ROR Partners states that its data-driven custom audiences can “substantially outperform lookalike and interest-based audiences created within the advertising platforms. This yields phenomenal overall results.”

16. The disclosure or making available of personal information to third parties is a component of the value of ROR Partners’ services.

17. When ROR Partners disclosed or made available personal information to clients as part of its services, it sold personal information to third parties for valuable consideration.

18. ROR Partners’ disclosures are sales of personal information, regardless of whether those sales are provided in a bundle with advertising and marketing services that ROR Partners may provide to its clients. *See* Civ. Code § 1798.140(ad)(1). A sale is a sale. A business cannot bypass the CCPA’s and the Delete Act’s requirements by selling personal information as part of a larger suite of products and services it offers.

B. ROR Partners Is a Data Broker Subject to the Delete Act and Failed to Register

19. ROR Partners is a for-profit legal entity that collects consumers’ personal information and determines the purposes and means of the processing of consumers’ personal information. ROR Partners annually buys, sells, or shares the personal information of 100,000 or more consumers or households.

20. ROR Partners conducts business as a data broker by knowingly collecting and selling to third parties the personal information of consumers with whom it does not have a direct relationship.

21. ROR Partners conducted business as a data broker during the 2024 calendar year.

22. On or before January 31 following each year in which a business meets the definition of a data broker, the business shall register with the Agency pursuant to the requirements in Civil Code § 1798.99.82(a).

23. ROR Partners failed to register as a data broker with the Agency by the January 31, 2025 deadline.

24. Consequently, the Agency's Enforcement Division opened an investigation and contacted ROR Partners about its failure to register. Settlement negotiations followed.

IV. CONTINGENCY

25. This Stipulated Final Order shall be contingent upon approval by the Board of the California Privacy Protection Agency ("Board"). ROR Partners understands and agrees that counsel for Complainant and the staff of the Agency may communicate directly with the Board and the staff of the Agency regarding this Stipulated Final Order, without notice to or participation by ROR Partners or its counsel. By signing the Stipulated Final Order, ROR Partners understands and agrees that it may not withdraw its agreement or seek to rescind the Stipulated Final Order before the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Order of Decision, the Stipulated Final Order shall be of no force or effect except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Agency shall not be disqualified from further action by having considered this matter.

V. OTHER MATTERS

26. The parties understand and agree that Portable Document Format ("PDF") and facsimile copies of this Stipulated Final Order, including PDF and facsimile signatures thereto, shall have the same force and effect as the originals. The parties may execute this Stipulated Final Order in counterparts.

27. This Stipulated Final Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Final Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

28. In consideration of the foregoing stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order of Decision:

VI. ORDER

IT IS HEREBY ORDERED that:

29. ROR Partners shall pay an administrative fine in the amount of fifty-thousand dollars (\$50,000.00 dollars) in accordance with Civil Code § 1798.99.82(e). ROR Partners shall remit payment in full within fourteen (14) days of the Board's Order of Decision approving the Stipulated Final Order pursuant to written instructions to be provided by the Enforcement Division.

30. Within fourteen (14) days of the Board's Order of Decision approving the Stipulated Final Order, ROR Partners shall pay the annual fee set forth in the Code of Regulations, title 11, § 7600(a), and submit a registration form to the Agency to effectuate its 2025 registration for its data broker activity in 2024.

31. ROR Partners shall comply with Civil Code § 1798.99.82 and timely register as a data broker for any future years in which ROR Partners operates as a data broker. If ROR

Partners ceases operating as a data broker, ROR Partners shall inform the Agency in writing before the deadline to register.

32. ROR Partners shall comply with Civil Code § 1798.99.85 and disclose in its privacy policy the required metrics regarding the number of California Consumer Privacy Act requests received, complied with, and denied during the previous calendar year, as well as the time within which ROR Partners substantively responded to the requests.

33. Each party shall bear its own attorneys' fees and costs.

VII. ADDITIONAL GENERAL PROVISIONS

34. Nothing in this Stipulated Final Order shall be construed as relieving ROR Partners of its obligations to comply with all state and federal laws, regulations, or rules, or as granting permission to engage in any acts or practices prohibited by such law, regulation, or rule.

35. ROR Partners shall use reasonable efforts to notify its officers, directors, employees, agents, and contractors responsible for carrying out and effecting the terms of this Stipulated Final Order and the requirements therein.

36. ROR Partners agrees that the terms of this Stipulated Final Order are in the public interest and fair, adequate, and reasonable under all the circumstances.

37. ROR Partners admits the truth of the factual findings in this Stipulated Final Order and agrees to be bound by its terms.

38. ROR Partners hereby waives the right to any hearings, and to any reconsideration, appeal, or other right to review which may be afforded pursuant to the California Administrative Procedures Act, the California Code of Civil Procedure, or any other provision of law. By waiving such rights, ROR Partners effectively consents to this Stipulated Final Order becoming final.

39. Nothing in this Stipulated Final Order shall constitute or be construed as a release from liability for any violations of law other than ROR Partners' violation of the Delete Act, Civil Code § 1798.99.82(c), arising from the company's failure to register as a data broker with the Agency between February 1, 2025 and October 8, 2025.

40. ROR Partners acknowledges that a "business, regardless of its status as a parent company or subsidiary of another business, which independently meets the definition of 'data broker' as set forth in Civil Code section 1798.99.80 for any period of time during the previous calendar year must register during the registration period through the Agency's website." CODE REGS. tit. 11, § 7602(a).

41. This Stipulated Final Order shall bind ROR Partners' heirs, administrators, executors, successors, and transferees.

42. Notwithstanding paragraph 33, in the event the Agency prevails in seeking to enforce any term of this Stipulated Final Order, the Agency shall be entitled to an award of attorney fees and costs in its favor and against ROR Partners for the time spent and costs incurred in prosecuting such action.

43. Failure to complete the payment or comply with any terms of this Stipulated Final Order shall result in enforcement of the Order in the Superior Court.

44. Any notices and reports under this Stipulated Final Order shall be served by email as follows:

To the Complainant:

Deputy Director, Enforcement Division
California Privacy Protection Agency
400 R St., Suite 350
Sacramento, CA 95811
ENF-processing@coppa.ca.gov

To the Respondent:

Rob Shantz
SVP, Chief Legal Officer
ROR Partners, LLC
6543 S. Las Vegas Blvd.
2nd Floor
Las Vegas, NV 89119
rob.shantz@rorpartners.com

Kenneth Dreifach
ZwillGen PLLC
183 Madison Avenue, Suite 1504
New York, NY 10016
ken@zwillgen.com

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VIII. ACCEPTANCE

I have carefully read the above Stipulated Final Order and have had the opportunity to seek and consult with an attorney. I understand the stipulation and the effect it will have on ROR Partners. I enter into this Stipulated Final Order voluntarily, knowingly, and intelligently, and agree to be bound by the Order of Decision by the Board of the California Privacy Protection Agency.

Dated: 11/15/25

Tom Lapcevic

Tom Lapcevic
Executive Chairman
ROR PARTNERS, LLC
Respondent

AS TO FORM AND CONTENT

Dated: _____

Kenneth Dreifach, Esq.
Anna Hsia, Esq.
ZwillGen PLLC
183 Madison Avenue, Suite 1504
New York, NY 10016
Attorneys for Respondent

VIII. ACCEPTANCE

I have carefully read the above Stipulated Final Order and have had the opportunity to seek and consult with an attorney. I understand the stipulation and the effect it will have on ROR Partners. I enter into this Stipulated Final Order voluntarily, knowingly, and intelligently, and agree to be bound by the Order of Decision by the Board of the California Privacy Protection Agency.

Dated: _____

Tom Lapcevic
Executive Chairman
ROR PARTNERS, LLC
Respondent

AS TO FORM AND CONTENT

Dated: November 12, 2025

Kenneth Dreifach
Kenneth Dreifach, Esq.
Anna Hsia, Esq.
ZwillGen PLLC
183 Madison Avenue, Suite 1504
New York, NY 10016
Attorneys for Respondent

IX. ENDORSEMENT

The foregoing Stipulated Final Order is hereby respectfully submitted for consideration by the Board of the California Privacy Protection Agency.

DATED: 11/13/2025

Respectfully submitted,



MICHAEL S. MACKO
Deputy Director of Enforcement



LARA KEHOE HOFFMAN
Assistant Chief Counsel

Neelofer Shaikh

NEELOFER SHAIKH
Attorney
Enforcement Division
Attorneys for Complainant