

Data Protection and Privacy for CCPA Compliance

The client owns and operates a chain of travel essentials stores, newsstands, specialty and luxury brands stores, cafes, bookstores, and duty-free shops in the United States and Canada. In 2018, the state of California passed a new regulation for businesses with an annual gross revenue exceeding \$25 million requiring compliance with guidelines intended to protect the personal data of consumers and company employees. Clarkston aligned with the company's chief information security officer (CISO) to create and implement a strategy to comply with the 2020 California Consumer Privacy Act (CCPA).

Clarkston oversaw the gathering of legal documents, finalized the data subject request procedure, conducted interviews for data inventory mapping, and jointly completed the client's reasonable security assessment. As a result of the work, the company now has an operational data subject request strategy, infrastructure, and supporting documentation to be compliant with the CCPA guidelines.

Consumer Products Case Study

PROJECT OVERVIEW

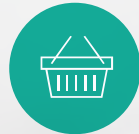


COMPANY:



A Retail Space for Travel
Essentials

INDUSTRY:



Specialty Retail

LOCATION:



New Jersey

PRIMARY OBJECTIVES:

- Realize a data subject request procedure and accompanied IT infrastructure
- Identify consumer, employee, and vendor personal information data storage locations and retention procedures
- Update employee and consumer privacy policies
- Complete an internal reasonable security assessment

RESOLUTION:

- Finalized the data subject request process with the legal team and the CISO
- Updated the consumer-facing website and employee handbook to include the new privacy policies and link to the data subject request form
- Created a secure online portal for consumers to access their personal information
- Established and communicated customer service's role in the updated process
- Conducted interviews with critical departments to discover the existing data records retention locations and procedures
- Developed employee and third-party data inventory matrices
- Conducted reasonable security assessment

KEY BENEFITS:

- The client is compliant with the CCPA guidelines and has the infrastructure to protect themselves against CCPA violations
- The business' consumption and storage of personal information is recorded and stored to successfully fulfill the data subject request procedure
- The legal team and cybersecurity team are aligned to manage all future data subject requests
- The client's cybersecurity team is well-equipped with a dynamic strategy to continue monitoring data retention locations and procedures
- The company is aligned with their parent company in data collection and retention policies

CCPA FAST FACTS

EFFECTIVE DATE:
January 1, 2020

ENFORCEMENT DATE:
Starting July 1, 2020

SCOPE:
For-profit companies that:

- Collect personal data on 50k+ California residents
- Have annual revenues of over \$25 million
- Earn 50%+ of annual revenue from California residents' data

NONCOMPLIANCE FINES:
For-profit companies that:

- Up to \$7,500 per violation with no limit to maximum number of violations
- \$100-\$750 per consumer, per incident for damages related to breaches

