



California Attorney General's Office Hosts Public Forum for CCPA Rulemaking

January 10, 2019 |

On January 8, 2019, the California attorney general's office hosted in San Francisco the first public forum on regulations it will write under the California Consumer Privacy Act, which will significantly alter the regulatory landscape governing the collection and use of data on California residents. The office will host five more meetings across California through February 13, 2019, to obtain additional public comments on the regulations.

The attorney general's office indicated that they will be promulgating regulations to implement the CCPA related to the following issues:

1. Categories of personal information;
2. Definition of unique identifiers;
3. Exceptions to the CCPA;
4. Submitting and complying with requests;
5. Uniform opt-out logo/button;
6. Notices and information to consumers; and
7. Verification of consumers' requests.

A Hudson Cook, LLP, representative attended the meeting along with about 150 other individuals, including tech companies, business lobbyists, and consumer advocates. Commenters raised a number of compliance concerns, including the definition of "personal information," the businesses that would be directly subject to the law, and the anticipated challenges in making the disclosures required by the law. Commenters also expressed concerns related to the application of the law to "deidentified" information and interpretation of the law's anti-discrimination provisions. Finally, several businesses pushed for the attorney general to create a safe harbor for certain business-purpose transfers.

The attorney general's office indicated that they would not be making any comments or responding to questions during this public comment process. In addition to receiving comments at the meetings, the office is currently receiving comments by email (at privacyregulations@doj.ca.gov) and mail (at the address provided in the attachment below). The attorney general must adopt regulations on or before July 1, 2020, and may not bring any enforcement action under the CCPA until six months after publication of the final regulations or July 1, 2020, whichever is sooner.

The CCPA is effective January 1, 2020. Aside from the attorney general's rulemaking, legislators have indicated that they may pursue further amendments to the law this legislative session.

We will continue to monitor and report on these developments.

Prior Alert: [California Amends Consumer Privacy Act](#)

[CCPA Rulemaking Activity](#)

© 2018 CounselorLibrary.com, LLC. Republished with permission. All rights reserved.

[CounselorLibrary.com](#), LLC, is an entity affiliated with the law firm of Hudson Cook, LLP.

[CounselorLibrary.com](#), LLC articles are written by attorneys with Hudson Cook, LLP, and by other authors, including employees of [CounselorLibrary.com](#), LLC. The views and opinions contained in the articles do not constitute the views and opinions of Hudson Cook, LLP. CounselorLibrary(R) products and services are available directly through and from www.CounselorLibrary.com and are not legal advice.

Hudson Cook, LLP, provides articles, webinars and other content on its website from time to time provided both by attorneys with Hudson Cook, LLP, and by other outside authors, for information purposes only. Hudson Cook, LLP, does not warrant the accuracy or completeness of the content, and has no duty to correct or update information contained on its website. The views and opinions contained in the content provided on the Hudson Cook, LLP, website do not constitute the views and opinion of the firm. Such content does not constitute legal advice from such authors or from Hudson Cook, LLP. For legal advice on a matter, one should seek the advice of counsel.

SUBSCRIBE TO INSIGHTS

HUDSON COOK

Celebrating its 25th anniversary in 2022, Hudson Cook, LLP is a national law firm representing the financial services industry in compliance, privacy, litigation, regulatory and enforcement matters.

7037 Ridge Road, Suite 300, Hanover, Maryland 21076
410.684.3200

www.hudsoncook.com

© Hudson Cook, LLP. All rights reserved. Privacy Policy | Legal Notice
Attorney Advertising: Prior Results Do Not Guarantee a Similar Outcome

