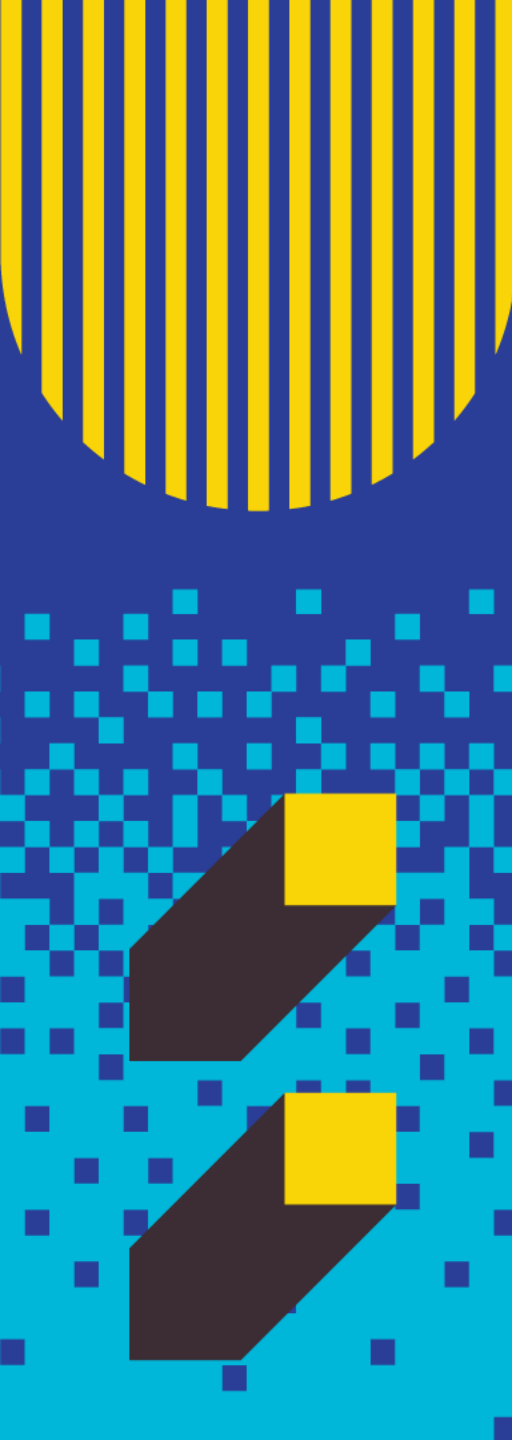




IAPP PRIVACY. SECURITY. RISK. + AI GOVERNANCE GLOBAL 2026

Training 6-7 October

Workshops 7 October

Conference 8-9 October

AI GP exam 9 October

SEATTLE

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ACCOUNTABILITY IN THE DATA ECONOMY: REGULATING DATA BROKERS

October 9, 2026

Ben Isaacson, In-House Privacy

Marissa Rosemlat, CalPrivacy

Jason Sarfati, Unacast

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CALIFORNIA PRIVACY PROTECTION AGENCY

CalPrivacy was established in 2020 with the mission to protect consumer privacy, ensure consumers and businesses are well-informed about their rights and obligations, and vigorously enforce the California Consumer Privacy Act (CCPA) and the Delete Act.

KEY ROLES OF CALPRIVACY



Rulemaking



Promoting Public
Awareness



Auditing &
Enforcement



Policy &
Legislation



Delete Request
and Opt-out
Platform

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LAWS REGARDING DATA BROKERS

2019

Data Broker Registration Law (AB 1202)

Defined "Data Broker" in California Law

- "A business that knowingly collects and sells to third parties the personal information of a consumer with whom the business does not have a direct relationship."

Created a public registry that was specially funded by annual fees.

2023

California Delete Act (SB 362)

Expands consumer deletion rights to include personal information held by data brokers.

Requires CalPrivacy to build an "accessible deletion mechanism", now known as the **Deletion Request and Opt-out Platform (DROP)**.

2025

Defending Californians' Data Act (SB 361)

Expanded disclosure requirements, including collection practices (whether the data broker collects information, including precise geolocation data, biometric information, and sexual orientation) and selling practices (whether a data broker sells to certain entities, including foreign actors, federal government, or developers of GenAI systems or models).

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PENALTIES & ENFORCEMENT (DELETE ACT)



Failure to Register

\$200 per day

Fine for each day after January 31 that data broker is not registered plus registration fee and CalPrivacy's costs of investigation and administrative action



Failure to Process Deletion Requests

\$200 per day, per consumer

Fine for each day a data broker fails to delete information as required under Delete Act plus CalPrivacy's costs of investigation and administrative action

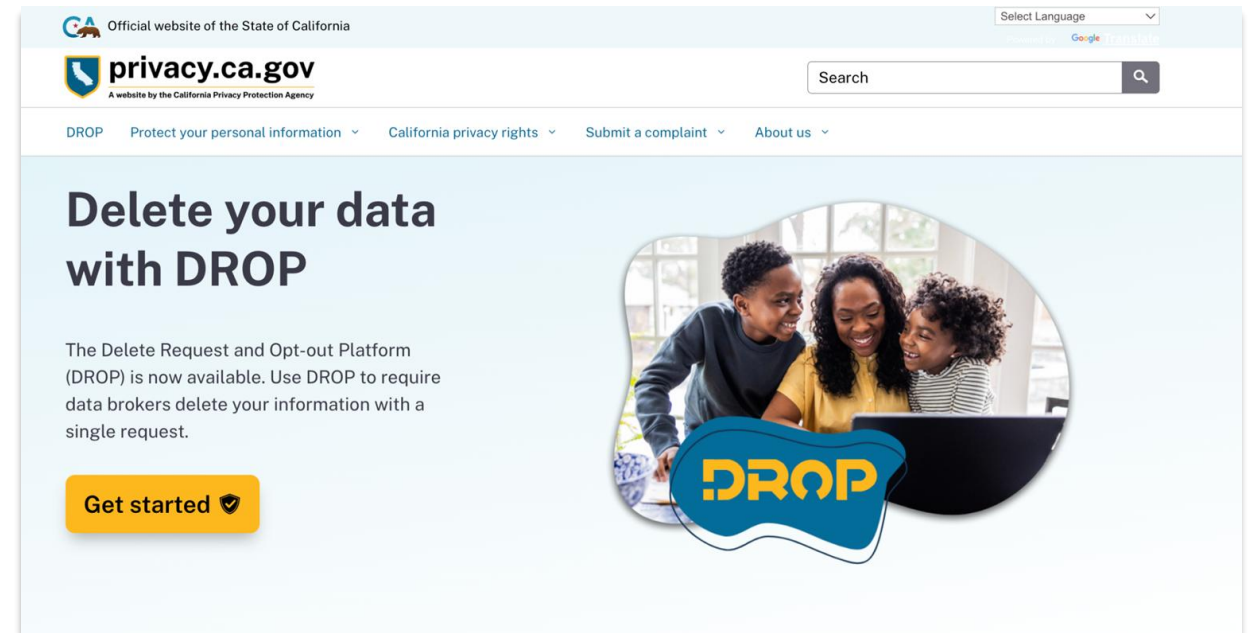


INTRO TO DROP

Delete Request and Opt-Out Platform

- California's "accessible deletion mechanism" required by the Delete Act (SB 362)
- One consumer request covers all 650+ active data brokers simultaneously
- No account created, no raw consumer data is retained by DROP
- All consumer identifiers are SHA-256 hashed — data brokers match records without seeing raw personal data
- Free for consumers to use

Civil Code section 1798.99.80 et seq.



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SUBMITTING A DROP REQUEST - VERIFY RESIDENCY

To be eligible to submit a deletion request, the person must be a California resident.

To verify residency, consumers may use personal information or sign in using Login.gov.

Residency is verified via the California Department of Technology's CA Identity Gateway.



The screenshot shows the DROP website interface. On the left is a dark blue sidebar with the DROP logo (a padlock icon followed by the word 'DROP') and two links: 'DROP status' and 'Exit DROP'. The main content area has a dark blue header with the text 'Verify you're a California resident'. Below the header is a progress bar with three steps: 'Check eligibility' (the first step, marked with a blue dot), 'Fill out request', and 'Submit request'. Below the progress bar, there is a red warning icon followed by the text 'Already submitted a request? [Check DROP status.](#)'. Below this, there is a paragraph: 'You can use DROP if you're a [California resident](#). Verify your residency by entering your personal information. Once verified, you'll be directed back to DROP. (?)'. Below the paragraph is a blue button with the text 'Verify you're a California resident'. Below the button is another paragraph: 'If you have Login.gov account, you can verify you're a California resident by signing in to your account. We suggest using this option only if you have an existing Login.gov account. (?)'. Below the paragraph is a button with the text 'Sign in with LOGIN.GOV'.

Sample screenshot. Subject to change

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SUBMITTING A DROP REQUEST - ENTER INFO

Consumers enter information into their profile.

Consumers may enter multiples of all identifiers except for date of birth.

Identifiers are hashed. No raw PII entered as part of a DROP request is stored by DROP.

Protect your privacy
Submit a request to delete your data

Progress: 1. Create profile (active), 2. Submit request

Start by entering some information about yourself. The more information you provide, the more likely your personal data will be deleted. This information is only used to find and delete your data.

[What will be deleted?](#)
[Submitting a request for someone else?](#)

Basic information

Name

First name:
Last name:

Names must include both a first and last name.
+ Add another name for the same person
Example: legal names, maiden name, other variations, etc.

Date of birth

Month: Day: Year:

ZIP/postal code

Only the initial five characters of the ZIP/postal code are used.
+ Add another ZIP code

Email address

We'll send you an email to make sure the number is correct.
+ Add another email address

Phone number

We'll call or text to make sure it's you.
☒ Text me ☐ Call me
+ Add another phone number

Mobile advertising ID (MAID)

+ Add another MAID

Connected TV ID

+ Add another TV ID

Vehicle identification number (VIN)

+ Add another VIN

☐ Check this if you're submitting this information for someone else.

Confirmation email

Enter the email address where we should send a confirmation email with your DROP ID. It's important to save your DROP ID, so you can check your status in the future.

Email address for confirmation

☐ Same as primary email.

All current and future data brokers who register with our Agency are included in your deletion request. If you would like specific data brokers to keep your data, you can remove them in the [data broker list](#).

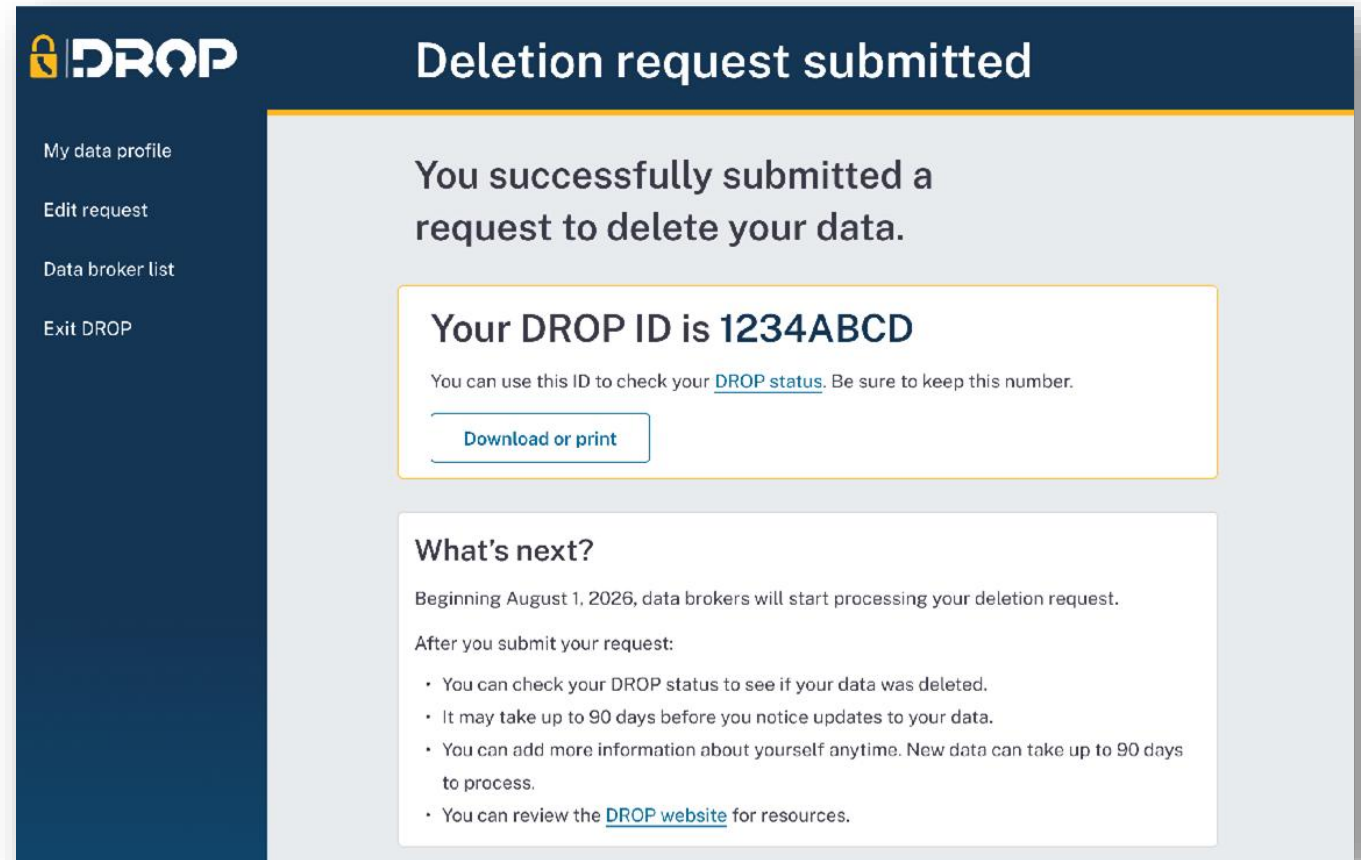
Sample screenshots. Subject to change

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SUBMITTING A DROP REQUEST - SUBMIT

Consumers submit their request and get an 8 digit DROP ID.

Consumers can use this DROP ID to check their request status.



The screenshot shows the DROP website interface. On the left is a dark blue sidebar with the DROP logo (a padlock icon) and the text 'DROP'. Below the logo are four menu items: 'My data profile', 'Edit request', 'Data broker list', and 'Exit DROP'. The main content area has a dark blue header with the text 'Deletion request submitted'. Below this, a light gray box contains the message 'You successfully submitted a request to delete your data.' followed by 'Your DROP ID is 1234ABCD'. A sub-message states 'You can use this ID to check your [DROP status](#). Be sure to keep this number.' and there is a button labeled 'Download or print'. Below this, another section titled 'What's next?' provides information about the processing timeline starting August 1, 2026, and lists four bullet points: checking status, 90-day processing time, adding more information, and reviewing the DROP website for resources.

Deletion request submitted

You successfully submitted a request to delete your data.

Your DROP ID is 1234ABCD

You can use this ID to check your [DROP status](#). Be sure to keep this number.

[Download or print](#)

What's next?

Beginning August 1, 2026, data brokers will start processing your deletion request.

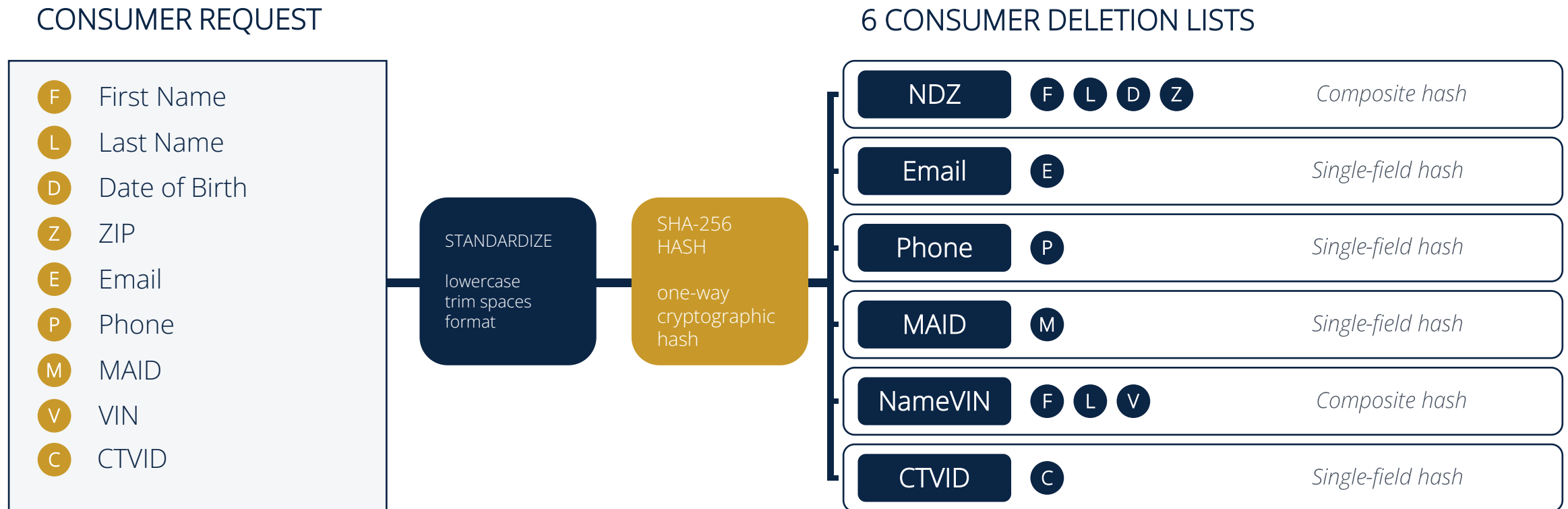
After you submit your request:

- You can check your DROP status to see if your data was deleted.
- It may take up to 90 days before you notice updates to your data.
- You can add more information about yourself anytime. New data can take up to 90 days to process.
- You can review the [DROP website](#) for resources.

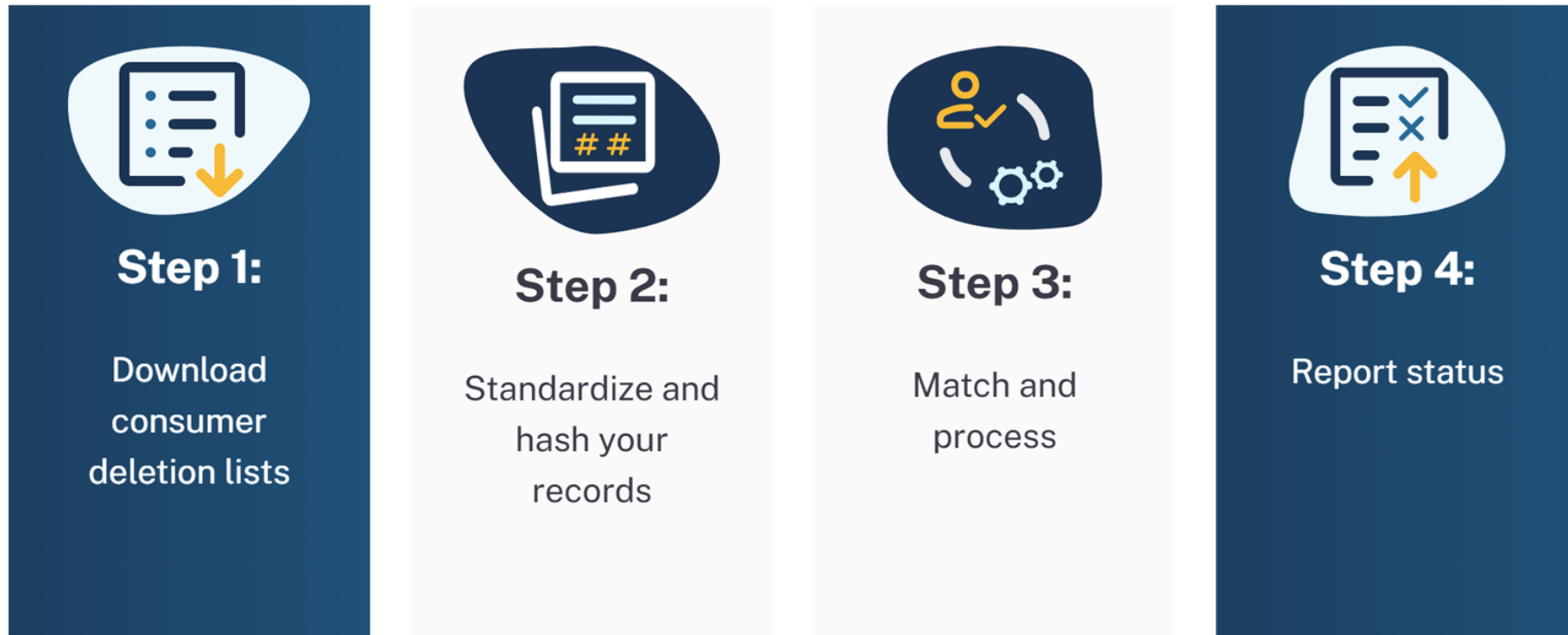
Sample screenshot. Subject to change

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HOW IDENTIFIERS MAP TO DELETION LISTS



DELETION REQUEST PROCESSING (DRP)



Repeat

at least once every
45 days

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MATCHING AND PROCESSING REQUESTS



Once standardized and hashed, data brokers compare their records to the hashed identifiers in the consumer deletion list(s) downloaded via DROP



If you find a match:

- Delete all non-exempt personal information, including inferences, for the consumer
- Direct all service providers and contractors to delete matching records



If you find a match and multiple consumers are associated with a single matched identifier:

- Opt all associated consumers out of sale and sharing
- Direct all service providers and contractors to opt-out accordingly



If you don't find a match:

- Save and maintain a list of all consumers who submitted a deletion request via DROP to screen any newly collected records before they are sold or shared to ensure the deletion request is maintained on an on-going basis

REPORTING STATUS



2

Exempted

Match found, but all personal information is exempt.

Example: Data is exempt because all of it is subject to GLBA.

3

Deleted

Match found. All non-exempt personal information deleted.

Example: Exact match on email address hash.

4

Opted Out

Multiple consumers are linked to the same identifier, and all are opted out of sale and sharing.

Example: A hashed phone number matches multiple consumers — all matching consumers opted out.

5

Not Found

No match found after completing the matching process.

Example: No records in the data broker's records match the hashed consumer identifiers provided.

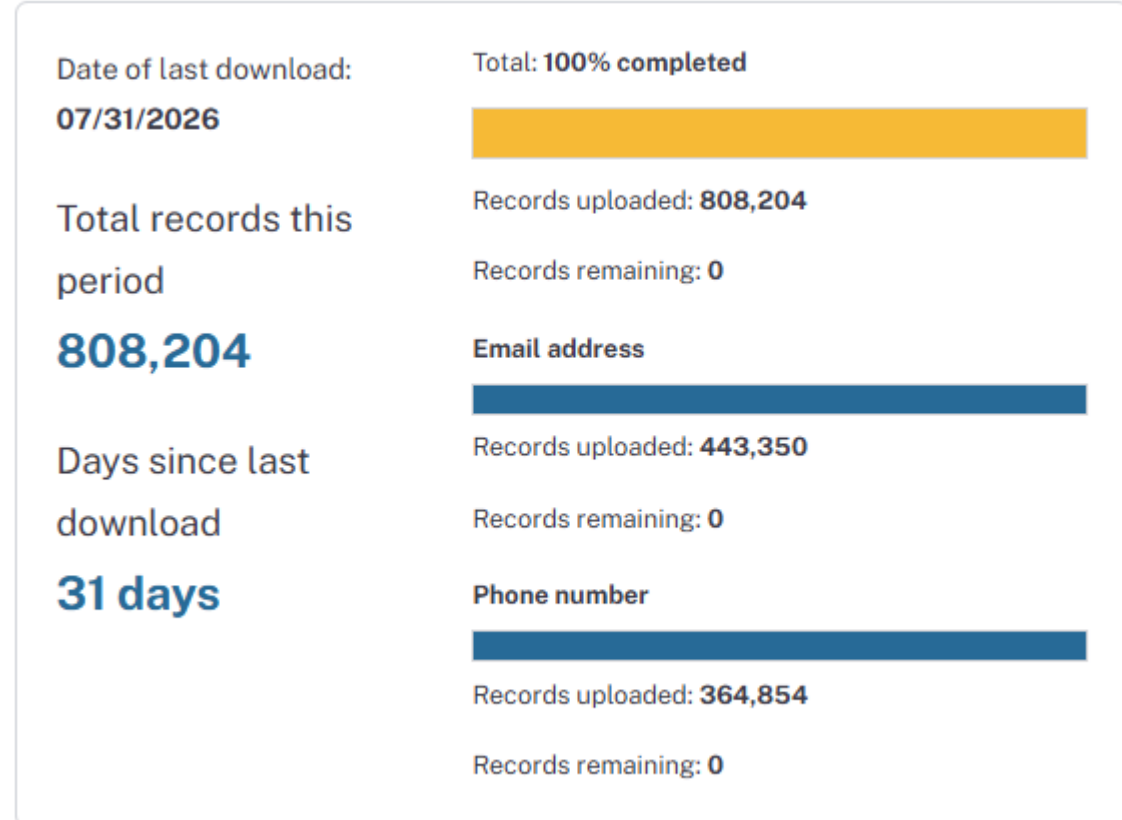


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DATA BROKER PORTAL

Data brokers can sign into DROP to process requests and to review batch status and information.

DROP sends notifications via email (and optionally via webhook) based on processing activity.



Sample screenshot. Subject to change

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DELETION REQUEST PROCESSING - KEY DATES

Ongoing Obligation

At least once every 45 days: access DROP and download deletion lists. Within 45 days of each download: upload response with status codes. *This cycle repeats indefinitely.*



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DROP SINCE LAUNCH + INSIGHTS FROM DRP

545,000+

**Deletion requests
submitted to date**

650+

**Data brokers active
in DROP**

60M

**Consumer profiles
reported deleted***



* Updated as of September 2026

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CONSUMER EXPERIENCE



My data profile

Edit request

Data broker list

Exit DROP

DROP ID 1234ABCD

Below is the data used in your current deletion request. Your data looks like this to protect you. When we collect your data, we securely store it in a format that is difficult to understand in the unlikely event of a breach.

You can add more data and submit an updated request anytime. Updates can only be processed every 45 days.

Data you provided

Name

F*****E

Date of birth

##/##/##

ZIP/postal code

#####

Email address

#####

Phone number

###-###-####

MAID

XXXXXXXX-XXXX-XXXX-XXXXXXXXXXXX

TV ID

VIN

###,###,###,###

Edit request

Status

Last request submitted: 11/11/2025

581

Total data brokers

Deletion status

Updated as of: 08/11/2026

Deleted: 40/200

Opted-out: 40/200

Exempted: 40/200

Record not found: 40/200

Pending: 40/200

See full list by data broker

All current and future data brokers who register with our agency are included in your deletion request. If you would like specific data brokers to keep your data, you can remove them in the [data broker list](#).



Data broker list

DROP status

My Data Profile

Data Broker List

Exit DROP

Here's a list of all currently active data brokers and your deletion request status for each broker. Data brokers are added to this list as soon as they create an account and register with CalPrivacy or newly begin processing deletion requests, whichever occurs first. Note that the status for all data brokers is likely to remain as "pending" until they begin processing deletion requests after August 1, 2026. If you are visiting this page prior to January 31, 2026, please check back later as the data broker registration process runs from January 1st to January 31st of each year.

If you want specific data brokers to **keep** your data, you can remove them by unchecking their box in the Delete data column and selecting Update list. If you're only updating the data broker list, you'll still need to submit a request on your profile for it to take effect.

☒ Select/Deselect all

Delete data	Data broker	Request status	Date updated
☒	Intalytics, Inc.	☐ N/A	N/A
☒	01Advertising, Inc.	☐ N/A	N/A
☒	33 Mile Radius LLC	☐ N/A	N/A
☒	33Across, Inc.	☐ N/A	N/A
☒	5x5 US, LLC	☐ N/A	N/A
☒	6sense Insights, Inc.	☐ N/A	N/A
☒	A Direct Marketing Inc.	☐ N/A	N/A
☒	Above Data, Inc.	☐ N/A	N/A
☒	Accudata Integrated Marketing, LLC	☐ N/A	N/A
☒	Accurate Append Inc.	☐ N/A	N/A

☒ Include future data brokers

< Previous

1234...60

Next >

Update list

Return

Sample screenshots. Subject to change

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DROP – DATA BROKER PERSPECTIVES

- Implementation and technical preparation
 - Develop a process that can **scale** and **remain interoperable** in the event other U.S. states, FTC, and/or foreign regulators launch their own DROP systems.
 - Develop a process that works seamlessly with Data Broker's own "Delete Feeds."
 - Socialize and obtain leadership buy-in for increased responsibilities – this workflow requires cross-functional collaboration.
 - labor and cap-ex needs.
- Operational considerations
 - Maintain "new" suppression lists (e.g. raw MAID → SHA-256 hashed MAIDs)
 - Implement procedures to ensure "fresh" downloads occur before 45-day deadline (e.g. programmatic APIs that run every 30 days).

REGULATING DATA BROKERS – LOOKING AHEAD

- Future Legal & Public Policy Trends
 - More US states passing data broker registries
 - Increased data broker registration fees
 - US state-level bans on the sale of sensitive data
- Economic Trends
 - Increased compliance obligations will drive consolidation in the data broker market
 - Data brokers will exit markets where compliance is cost-prohibitive (i.e. New Jersey broker fee)



DATA BROKERS THAT DON'T REALIZE THEY ARE DATA BROKERS....

1. **Business-to-Business Data Providers:** There are no exemptions for 'business professionals' or publicly scraped employee profile data.
2. **Advertising and Marketing Agencies:** Any procurement of third-party data, including lookalike models, with added fees for clients' use of this data.
3. **SaaS Platforms:** No exemptions for software intermediaries that 'make available' third-party data for commercial use, even with a 'service provider' designation.
4. **Market Research Providers:** Any resale of third party survey respondents, sale of enriched data about respondents, or 3rd party individual response data.

AND, OF COURSE....

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DATA BROKERS THAT DON'T REALIZE THEY ARE DATA BROKERS....

5. AD-TECH

“Direct relationship” means that a consumer has intentionally interacted with a business for the purpose of accessing, purchasing, using, or requesting, or obtaining information about the business’s products or services. A business does not have a “direct relationship” with a consumer simply because it collects personal information directly from the consumer; the consumer must intend to interact with the business. A business is still a data broker and does not have a direct relationship with a consumer as to personal information it sells about the consumer that it collected outside of a “first party” interaction with the consumer, as that term is defined in California Code of Regulations, title 11, section 7001.

DATA BROKERS THAT DON'T REALIZE THEY ARE DATA BROKERS....

Data Enrichment
or Append

"Off-site" or
"Audience
Extension"

Identity Graphing

Types of Audience Segmentation



Demographic
segmentation



Behavioural
segmentation



Psychographic
segmentation



Technographic
segmentation



Transactional
segmentation



Contextual
segmentation



Lifecycle
segmentation



Predictive
segmentation

 matomo

Cooperative
Audience
Segmentation

Lookalike
Audience
Targeting

B2B Account-
Based Marketing

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CALPRIVACY DATA BROKER ENFORCEMENT TAKE-AWAYS

1. No 'safe harbor' for simple mistakes like missing registration renewal.
2. Penalties have been 'by the book' - no deviation from statutory expectations.
3. No exemptions for out of state entities, publicly available data used for modeling/enrichment, or attempts to 'geofence' California residents.
4. 'Disgorgement' of CA data sold in violation of the Delete Act is possible.

Do The Math! DROP statutory penalties for unregistered data brokers can exceed \$100,000,000 per day!

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Q+A

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RESOURCE LIST

Resources for data brokers:

- [DROP for data brokers - privacy.ca.gov](https://www.privacy.ca.gov/drop-for-data-brokers/)
- CalPrivacy's "Getting ready for deletion request processing" [webinar recording](#)

For California consumers to submit a DROP request:

- [Delete Request and Opt-out Platform \(DROP\)](#)

[DRAFT] Data Broker Regulation Amendments and Compliance Audits – Text of Proposed Regulation

- [CHAPTER 3. DATA BROKER REGISTRATION AND ACCESSIBLE DELETION MECHANISM](#)
- ou



How Did Things Go? (We Really Want To Know)

Did you enjoy this session? Is there any way we could make it better? Let us know by filling out a speaker evaluation.

1. Open the IAPP Events app.
2. Select **IAPP P.S.R. + AIGG 2026**.
3. Tap "Schedule" on the bottom navigation bar.
4. Find this session. Click "Rate this Session" within the description.
5. Once you've answered all three questions, tap "Done".

Thank you!

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