



IAPP Global Summit 2026

Privacy | AI governance | Cybersecurity law

Conference 30-31 March

Workshops 1 April

Training 1-2 April

WASHINGTON, DC

#IAPPSummit26

DROP Update: Reviewing the Delete Request and Opt-Out Platform

Tuesday, March 31, 2025, 1:30 p.m.

*California Privacy Protection Agency (CalPrivacy)
California Department of Technology (CDT)*

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AGENDA

- Welcome and Introductions
- History & Overview of the Delete Act
- How we built it – leveraging state resources
- Tour of the Delete Request and Opt-out Platform (“DROP”)
 - Consumer Experience
 - Data Broker Experience
- Additional obligations and considerations for data brokers
- Legislation in Other States
- Q+A

WELCOME AND INTRODUCTIONS



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CalPrivacy



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CalPrivacy



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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), the Delete Act, and the Opt Me Out Act.

KEY ROLES OF CALPRIVACY



Rulemaking



**Promoting
Public
Awareness**



**Auditing &
Enforcement**



**Policy &
Legislation**

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 through 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).



What is a data broker?

“[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.**” (Civ Code § 1798.99.80(c))

“Direct relationship’ means that a consumer **intentionally interacts** with a business. . . . A business is still a data broker if it has a direct relationship with a consumer but **also sells personal information about the consumer that business did not collect directly from the consumer.**” (11 CCR § 7601(a))

Data brokers often collect PI from a variety of sources and sell to many different types of entities (e.g. advertisers, governments, businesses, etc.)



Why does this matter?

- ▶ Massive quantities of **sensitive, personal information** held in one place
- ▶ Most **consumers do not know** this collection and sale is happening
- ▶ This data gets **sold** to many other entities

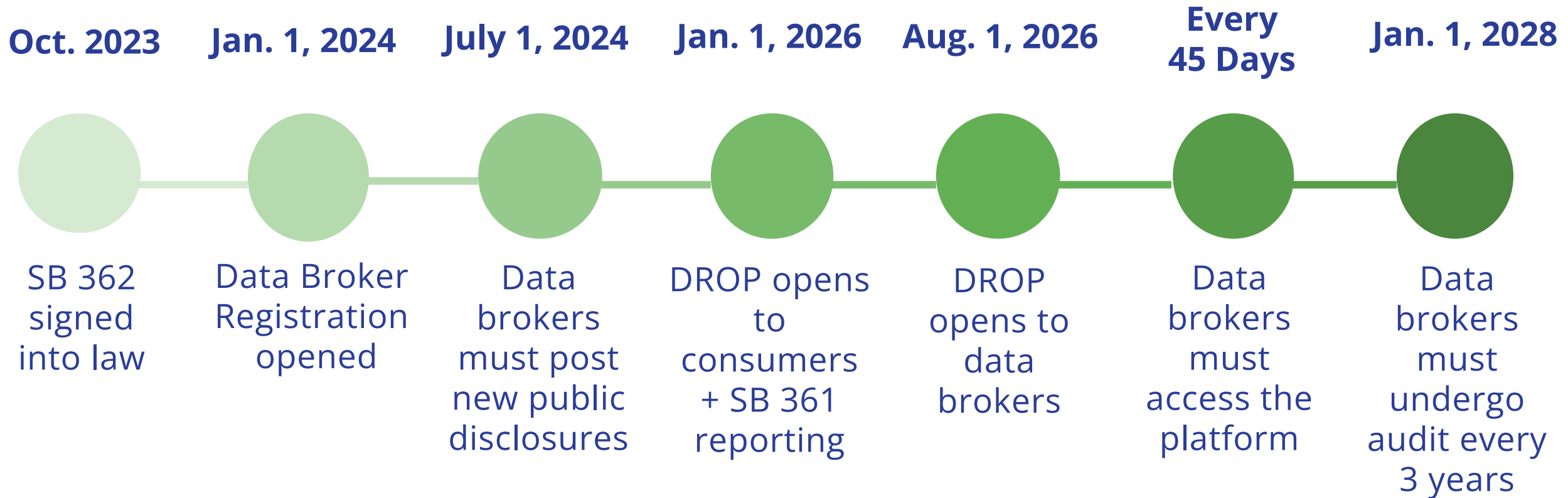


Delete Act Overview

Data Broker Requirements

- Registration: Annual form + fee every January
- Deletion: Process consumer deletion requests every 45 days via the accessible deletion mechanism beginning August 1, 2026
- Website Disclosures: Publish mandatory information about consumer rights requests every July 1 on website privacy policy
- Audit: Undergo independent audit every three years starting January 1, 2028

Delete Act Implementation Timeline



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Delete Request and Opt-out Platform ("DROP")

Challenges:

- Varied PI collection/maintenance by data brokers
- Connecting consumers with data broker profiles without over-exposing information
- Implementing a "privacy-protective" system
- Consumer residency verification
- New data collection for new Agency

Delete Request and Opt-out Platform ("DROP")

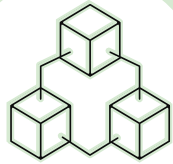
Solutions:

- Close coordination between Legal, Program, & IT from outset, including collaboration on system requirements
- Identified commonly held PI by data brokers
- Leveraging CDT's Identity Gateway for residency verification
- No PI stored in plain text – everything hashed
- PI is divided before sharing with brokers
- MFA for certain common PI (email, phone numbers)

The Data Broker Unit

Product

- Engineering
- UX
- Privacy by design



Legal

- Regulations
- Data broker registry
- Contracts

Comms

- Events
- Blogs
- Website

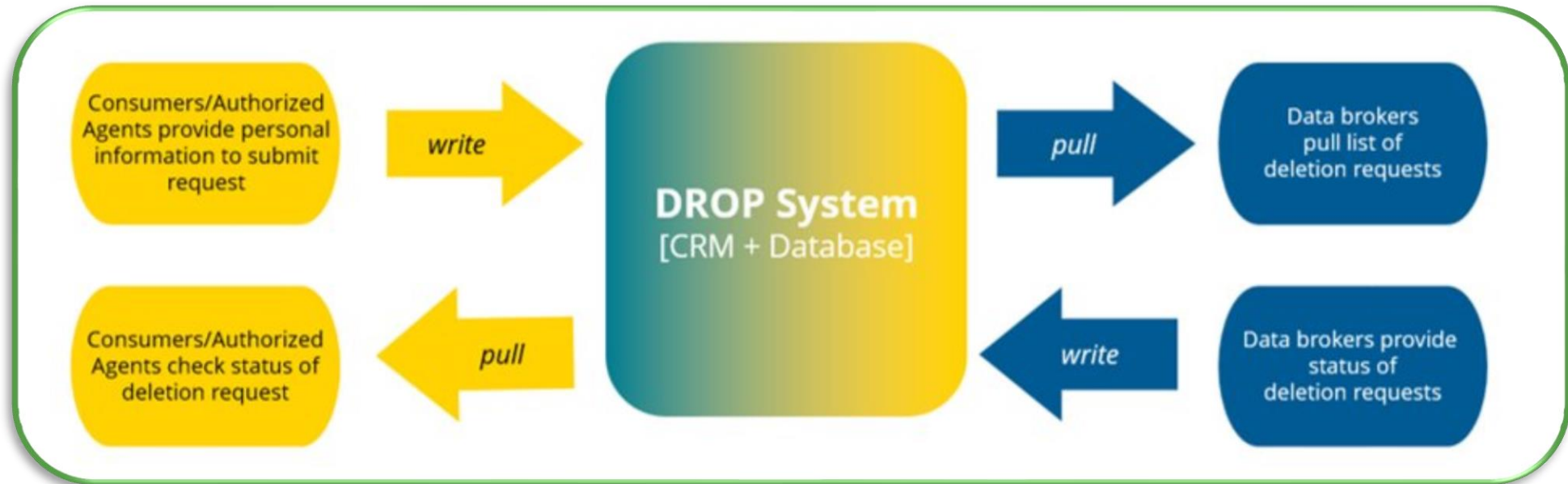


IT

- Tickets
- Managing vendors



How it works



- Personal information stored in hashed format.
- **Data brokers only download the types of information they already have** (e.g., email) from deletion request lists, and **skip other types** (e.g., phone) they don't have.

DROP Preview: Consumer Experience



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How it works: Consumers

STEP 1

Verify your eligibility

Confirm that you are a California resident using the California Identity Gateway.

STEP 2

Create your profile

Give basic information about yourself. You choose how much to provide.

STEP 3

Submit your request

DROP lets you send a single request to over 500 registered data brokers.

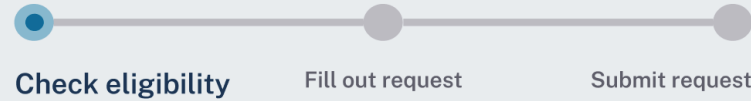


1

ID VERIFICATION

Verify residency using a third party

Verify you're a California resident



You can use DROP if you're a [California resident](#).

Verify you're a California resident through our California Identity Gateway by entering your personal information or using  LOGIN.GOV .

Once verified, you'll be directed back to DROP.

ⓘ Each time you use DROP, you must use the same method to verify you're a California resident. Example: If you used Login.gov, then you must always use Login.gov.

Use personal information

Use Login.gov

Having trouble? [Contact us](#)

[Exit DROP](#)

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1

ID VERIFICATION

Verify residency using a third party

CA Official website of the State of California

Use personal information

for identity and residency verification

Your privacy matters

The California Identity Gateway only asks for the information needed to verify your identity and program eligibility. **We don't store your information.**

Basic information

Name

First name

First name is required and cannot contain emojis or special symbols.

Last name

Date of birth

Month

Day

Year

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Address

Must be a California resident. Provide your current or most recent California address.

Street address

Apt/Ste

City

State

ZIP Code

Country

Phone or email

Enter your phone or email to receive a code

Send code

Enter code

I don't have an email or phone.

Selecting this option requires your Social Security Number or ITIN below.

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2

CONSUMER PERSONAL INFORMATION

Provides a minimal amount of personal information & authentication of certain data elements

The screenshot shows a web interface for submitting a privacy request. At the top, a dark blue header contains the title "Protect your privacy" and a link "Submit a request to delete your data". Below the header is a progress bar with three steps: "Check eligibility" (active), "Create profile", and "Submit request". A paragraph explains that providing more information increases the likelihood of data deletion. A link "What will be deleted?" is provided. A dropdown menu is open, showing the option "Submitting a request for someone else?". The "Basic information" section includes fields for "First name" and "Last name", with a note that names must include both. There is also an option to "Add another name for the same person" with an example: "Example: legal names, maiden name, other variations, etc."

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2

CONSUMER PERSONAL INFORMATION

Provides a minimal amount of personal information & authentication of certain data elements

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

example@email.com **Verify**

We'll send you an email to make sure the number is correct.

+ Add another email address

Phone number

 +1 ▾ ###-###-#### **Verify**

We'll call or text to make sure it's you.

Text me Call me

+ Add another phone number

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2

CONSUMER PERSONAL INFORMATION

Provides a minimal amount of personal information & authentication of certain data elements

Unique identifiers

A unique identifier(ID) is assigned to a specific device or item like a smartphone, smart TV, or car. Data brokers use these IDs to track your habits and sell or share your data. Providing unique identifiers is optional.

Mobile Advertising ID (MAID) ?

XXXXXXXX-XXXX-XXXX-XXXX-XX

+ Add another MAID

Connected TV ID ?

+ Add another TV ID

Vehicle Identification Number (VIN) ?

+ Add another VIN

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3

SUBMIT REQUEST

Submit the request to all or a subset of registered data brokers

You successfully submitted a request to delete your data.

Your DROP ID is **8FFB6BCA0A304A3F5DB708DE01166970**

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

Print

What's next?

After you submit your request, here's what happens:

- Data brokers process your deletion request within 45 days, beginning August 1, 2026.
- You can check your DROP status to see if your data was deleted.
- 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.

Reminder: Each time you use DROP, you must use the same method to verify you're a California resident. Example: If you used Login.gov, then you must always use Login.gov.

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4

CHECK STATUS

Check status and/or update your deletion request in 45 days

Data broker list

Here's a list of all registered data brokers and your deletion request status for each broker. By default, all registered data brokers are on the list.

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
<input checked="" type="checkbox"/>	Data broker 1	Deleted	11/11/2026
<input checked="" type="checkbox"/>	Data broker 2	Opted-out	11/11/2026
<input checked="" type="checkbox"/>	Data broker 3	Exempted	11/11/2026
<input checked="" type="checkbox"/>	Data broker 4	Record not found	11/11/2026
<input type="checkbox"/>	Data broker 5		
<input checked="" type="checkbox"/>	Data broker 6	Deleted	11/11/2026
<input checked="" type="checkbox"/>	Data broker 7	Opted-out	11/11/2026
<input checked="" type="checkbox"/>	Data broker 8	Exempted	11/11/2026
<input checked="" type="checkbox"/>	Data broker 9	Record not found	11/11/2026
<input checked="" type="checkbox"/>	Data broker 10	Pending	11/11/2026
<input type="checkbox"/> Include future data brokers			

< Previous 1 ... 4 **5** 6 ... 99 Next >

[Update list](#) [Return](#)

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4

CHECK STATUS

Check status and/or update your deletion request in 45 days

Your DROP status

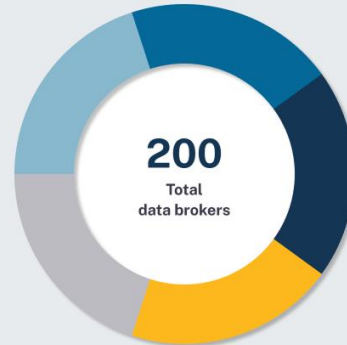
Enter your DROP ID to check the status of your DROP deletion request. Your ID contains 8 to 10 characters (letters and numbers).

Your DROP ID ?

DROP ID example here

Submit

Last request submitted 11/11/2026



Deletion status ?

- Deleted: 40/200
- Opted-out: 40/200
- Exempted: 40/200
- Record not found: 40/200
- Pending: 40/200

You can validate your residency again to access your DROP account. Here, you can get and add more details about your request. [Access your full DROP account.](#)

Exit

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255,000+

Consumer requests as of March 20, 2026.

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DROP Preview: Data Broker Experience



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How it works: Data Brokers

1

Create account

2

Complete registration, including payment

3

Choose consumer deletion lists based on identifier(s)

4

Download deletion list via API or manually 1x every 45 days

5

Identify matches

6

Delete records and maintain suppression list

7

Report deletion status within 45 days

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1

Create account

Create your DROP account

After you create your account, you can complete and submit your annual registration, access deletion lists, and manage your profile.

Note: Each business must have only one account. However, any business, regardless of its status as a parent company or a subsidiary of another business that meets the definition of "data broker" must have a separate account.

*Required fields

Business Information

Did you operate as a data broker for any period of time in 2025?

Yes No

* Business Name

* Doing business as (DBA)

+ Add additional DBA

* Business EIN or TIN 

* Business email address

Same as sign-in email

* Business website URLs

Your public-facing website address(es), including any website address through which it offers or provides data broker services.

+ Add another URL

Contact information

Primary point of contact

* First name

* Last name

* Email address

Same as business email

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2

Complete registration, including payment

2026 Annual registration form

Complete your annual registration form. Check that all of the information below is accurate. If any of this information has changed, please update it.

Registration information is made publicly available on the Agency's website except where noted. All information will be autosaved, and you can return to this form at any time.

Account information

Business information

Business name Data Broker 1	Doing Business As (DBA) Data Broker One
Business phone 000-000-0000	Business email DataBrokerOne@email.com
Business address 123 Street St. City, CA 90000	Business website(s) DataBrokerOne.com DataBrokerOne2.com DataBrokerOne3.com

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Contact information

Point of contact First Middle Last	Secondary contact First Middle Last
Point of contact phone number +1 000-000-0000	Secondary contact phone number +1 000-000-0000
Point of contact email FirstLast@email.com	Secondary contact email FirstLast@email.com

[Update information](#)

The information is current and accurate.

Data brokers registering in 2026 are required to disclose their 2025 consumer requests metrics in their privacy policies by July 1, 2026.

I confirm I've read and understand this message.

[Next >](#)

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566

Data brokers registered as of March 20, 2026.

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3

Choose consumer deletion lists based on identifier(s)

Data broker portal

Data Broker 1

2026 Registration ✔ Complete

Last registration date: 1/11/2026

Deletion requests ✔ Active

You can process these requests using your own system through an API key.
You can also download and upload these lists manually.

List date: 11/11/2026 44% completed

Total records this period
30,452

Records uploaded	10,308
Records remaining	20,144

Note: Push and pull requests are closed between 1:00 AM and 3:00 AM Pacific Time daily while our system batches the most current data.

Consumer deletion lists

You can select the list(s) that need to be included in your API and/or manual lists to download. You can change lists at anytime.

Note: When you change your lists, you can still use your current API key. However, you'll need to download your new lists.

[View or change lists](#)

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Consumer deletion lists you've selected

List date: 1/5/2026

List	# of records
Email	105
Phone number	426
Name, Vehicle Identification Number (VIN)	267

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4

Download deletion list via API or manually 1X every 45 days

API key Manual download Manual upload Manual update

API key

API key: 12345678987654321

Last deletion list download: 11/11/2026

Last upload date: 12/12/2026

[Get a new API key](#)

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Manual download

Lists may only be used to match consumer records and effectuate the deletion request. A data broker may not contact consumers to verify their deletion request submitted through DROP. Selling or sharing consumer personal information provided by the Agency is prohibited.

You will download lists in a ZIP format that contains one or more CSV files. Each file contains a maximum of 100,000 records. If there are more than 100,00 records, they will be in separate files.

Consumer deletion lists you've selected

List date: 1/5/2026

List	# of records
Email	105
Phone number	426
Name, Vehicle Identification Number (VIN)	267

Total number of records: 798

File size: 1 GB

[Download lists](#) [Cancel](#)

*Subject to change CalPrivacy, 03/11/2026

Manual upload

Legal information about only selecting the list the applies to the information they already collect from consumers, and any potential consequences for not following this information. Within 45 days of downloading consumer deletion requests, you must process the requests and then report a status for each request before uploading the data back into DROP, choosing from "record deleted," "record opted-out of sale," "record exempt," "record not found." Failure to accurately report status of the deletion requests could result in administrative action against your business.

You can only upload CSV files. Your file must have the same file name of the list you downloaded.

You must name the file using this specific naming convention: run_[run ID here]

Example: run_abcd1234 <add in when naming convention is provided>

Drag and drop or select a file

CSV files only, file size no more than 25 MB

[Select file](#)

[Upload files](#) [Cancel](#)

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5

Identify matches

§ 7613(a)(1)(A). Processing Deletion Requests.

- Standardization
- Hash
- Match
- Delete entire record located using the identifier (subject to exemptions)

5

Identify matches

8. Hashing Protocol

This section defines how DROP generates **composite hashed identifiers** for specific data types by **ordering and re-hashing previously hashed parameters**.

All data is hashed using SHA-256(UTF-8) and encoded in Base64. Ensure that all personal identifiers are normalized before hashing. Normalization includes lowercasing, removing spaces, removing special characters, and formatting dates and phone numbers as specified.

8.1. Normalizing Personal Information Before Hashing

This subsection explains how each field is normalized prior to hashing.

8.1.1 General rules (applies to all fields)

1. Remove all spaces, punctuation, and symbols unless stated otherwise.
2. Convert to lowercase.
3. Process according to the specific identifier instruction below.
4. Use **SHA-256**
 - Input Encoding: UTF-8
 - Output Encoding: lowercase Base64

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6

Delete records and maintain suppression list

Processing Deletion Requests

- 1) **Delete all** consumer **personal information**, including **inferences based in whole or in part on personal information collected from third parties** or from a consumer in a non-“first party” capacity, that is associated with a matched identifier in the data broker’s records. (§7613(a)(1)(A))
- 2) **Continue to maintain the minimum personal information** necessary to facilitate **compliance** for each consumer that submits a deletion request (§7613(a)(1)(A))
- 3) **Direct all service providers and contractors to delete** all personal information in its possession related to a consumer associated with a matched identifier (§7613(d))

7

Report deletion status within
45 days

§ 7614. Reporting Status of Deletion Requests

(a) After a data broker accesses the DROP for the first time, the data broker must, at each subsequent access session, **report the status of every deletion request** received during the previous access session.

7

Report deletion status within 45 days

10. Upload File Schema: Status Updates

Data brokers must report a status for each record that they identify. This will be identified as string containing only numbers. Please see the following example on how the CSV must be structured:

Id	Status
941	2
942	3
943	4

All Data brokers must respond to the work items with the below status numbers while uploading back respective response file. See the example below.

Status	Code	Meaning
Record deleted	2	Match found → non-exempt personal info deleted (per § 7613(b)).
Record opted out of sale	3	Multiple matches → all opted out of sale/sharing.
Record exempted	4	Match found, but all data is exempt under Civil Code § 1798.99.86.
Record not found	5	No match found after applying § 7613 matching process.

Note: The file upload endpoints will have two modes i.e. “New” & “Amend” the flag must be sent as a path parameter in the end point if API is being used. If it is being uploaded via UI, “amend” option must be used for amending records and “new” for fresh set of updates being posted back.

Endpoints:

POST /api/data/datapush/new

POST /api/data/datapush/amend

*Subject to change
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Timeline for Deletion Request Processing

- **January 1, 2026** – DROP opens for consumers to submit deletion requests & data brokers to create accounts
- **January 1-31, 2026** – Data brokers register through DROP
- **Spring 2026** – API integration for data brokers opens
- **August 1, 2026** – Data brokers download, process, and report status of deletion requests once every 45-days



Enforcement

- CalPrivacy actions against more than a half-dozen data brokers for failure to register. You can find them at: <https://cppa.ca.gov/announcements/>
- Administrative Fines
 - **Failure to register — \$200/day + unpaid fees + enforcement costs**
 - **Failure to delete consumer personal information — \$200/day/consumer + enforcement costs**

CYBERSECURITY AUDITS & RISK ASSESSMENTS



A business must complete an annual cybersecurity audit if it:

Made 50%+ of its annual revenue the prior year from selling or sharing consumers' PI;

OR

Made >\$26.6 million* the prior year; **AND**

Processed the PI of 250,000+ consumers or households the prior year;

OR

Processed the SPI of 50,000+ consumers in the prior year.

Reference: 11 CCR § 7120(b)



A business must conduct a risk assessment before:

- Selling or sharing PI
- Processing SPI
- Using ADMT for a significant decision
- Using automated processing to infer or extrapolate certain consumer characteristics, based on (1) systemically observing consumers in educational or employment settings or (2) consumers' presence in a sensitive location; and
- Using personal information to train certain automated technologies.

Reference: 11 CCR § 7150(b)

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COMING SOON...AUDITS!

1798.99.86 (e)

(1) Beginning January 1, 2028, and every three years thereafter, a data broker shall undergo an audit by an independent third party to determine compliance with this section.

(2) For an audit completed pursuant to paragraph (1), the data broker shall submit a report resulting from the audit and any related materials to the California Privacy Protection Agency within five business days of a written request from the California Privacy Protection Agency.

(3) A data broker shall maintain the report and materials described in paragraph (2) for at least six years.

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Multistate Action

Data Broker Registry Laws

- Vermont, 2018
- California, 2019, amended 2023, amended 2025
- Texas, 2023, amended 2025
- Oregon, 2023

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Multistate Action – Delete Act Style Bills

Connecticut (SB 4) - filed 2026

Registration required to operate in the state and deletion mechanism requirements

Hawaii (HB 2463) - failed

Registration, deletion mechanism requirements & PRA

Illinois (HB 4809, 2026) & (HB 2913, 2025)

Both similar to CA Delete Act

Nebraska (LB 602) - carried over to 2026

Similar to CA Delete Act

New Mexico (SB 192) - failed

Similar to CA Delete Act

New York (A 9642/S 9088) - filed 2026

Similar to CA Delete Act

New York (A 10008B) - filed 2026

Budget bill containing Delete Act provisions

Rhode Island (S 2766) - filed 2026

Similar to CA Delete Act

Vermont (H 211) - carried over to

2026 Proposed amendments include registration & study of deletion mechanism

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Questions?

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RESOURCE LIST

CalPrivacy's Laws & Regulations Page:

<https://cppa.ca.gov/regulations/>

Data Broker Registry:

https://cppa.ca.gov/data_broker_registry/



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 Summit 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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