



IAPP Privacy. Security. Risk. 2025

Training 28-29 October

Workshops 29 October

Conference 30-31 October

SAN DIEGO

#PSR25

From Legislation to Reality: Previewing Automated Delete Requests

*Thursday, October 30, 2025, 12:45 – 1:45 p.m.
California Privacy Protection Agency
(CalPrivacy)*

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AGENDA

- I. Welcome and Introductions
- II. History & Overview of the Delete Act
- III. Introducing the Delete Request and Opt-out Platform (“DROP”)
 - i. Preview of Consumer Experience
 - ii. Preview of Data Broker Experience
- IV. Timeline
- V. Legislation in Other States
- VI. Questions and Answers

WELCOME AND INTRODUCTIONS



Philip Laird, General Counsel
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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), as well as the Delete Act.

KEY ROLES OF CALPRIVACY



Rulemaking



**Promoting
Public
Awareness**



**Auditing &
Enforcement**



**Policy &
Legislation**

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



Data Broker Registry – 2019

Data Broker Registration Law – AB 1202, 2019 (Civ Code § 1798.99.80 et seq.)

- Administered by the Attorney General for 3 years (2021-2023)
- 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

The Delete Act

SB 362, passed in October 2023

- Updated registration requirements and transferred registry administration to CalPrivacy
- Added requirement for CalPrivacy to build an “Accessible Deletion Mechanism” on its website where consumers can send a new type of deletion request to all registered data brokers

SB 361, passed in October 2025

- Adds registration disclosures about collection of certain personal information, including new categories of sensitive PI
- Requires disclosure of sales of personal information to certain entities (e.g. federal government, foreign actors, developers of GenAI)

Delete Act Overview

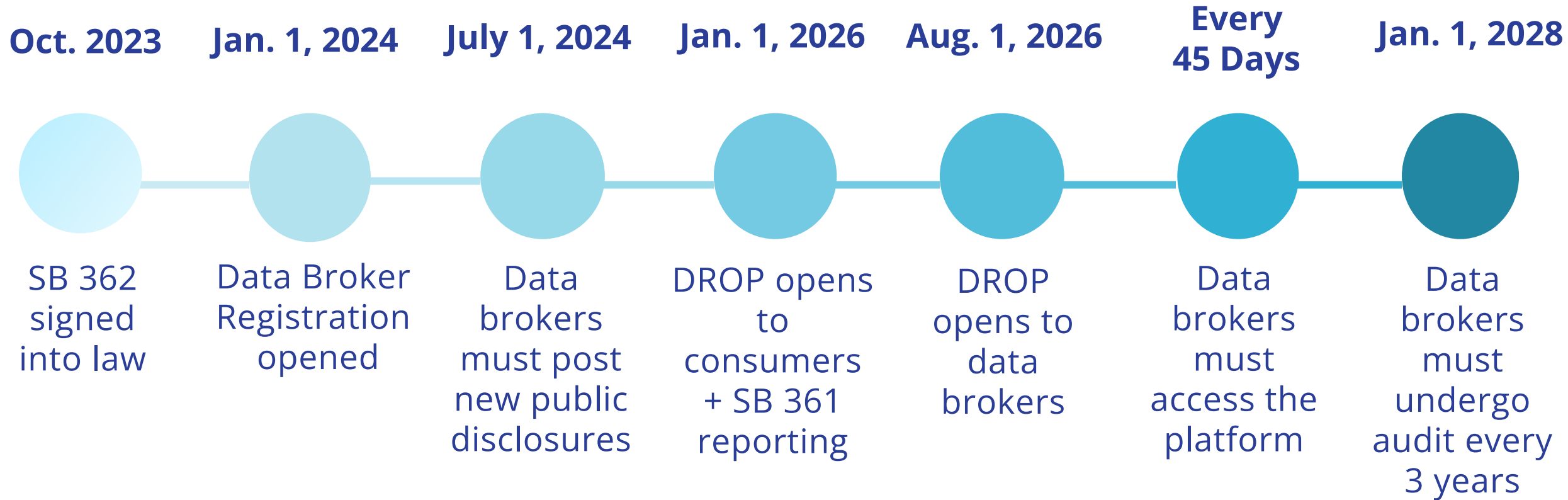
Data Broker Requirements

- 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

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**

Delete Act Implementation Timeline



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



DROP System Overview: Consumer Experience

1

ID VERIFICATION

Verify residency using a third party

2

CONSUMER PERSONAL INFORMATION

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

3

SUBMIT REQUEST

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

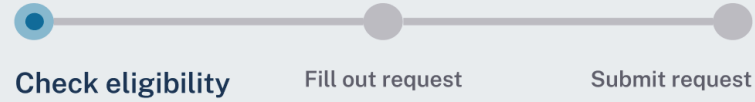
4

CHECK STATUS

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

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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](#)

*Subject to change

CONSUMER PERSONAL INFORMATION

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

Protect your privacy

Submit a request to delete your data



Check eligibility

Create profile

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

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.

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CONSUMER PERSONAL INFORMATION

Provide 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

*Subject to change

CONSUMER PERSONAL INFORMATION

Provide 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)

+ Add another MAID

Connected TV ID

+ Add another TV ID

Vehicle Identification Number (VIN)

+ Add another VIN

*Subject to change

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.

*Subject to change

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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CHECK STATUS

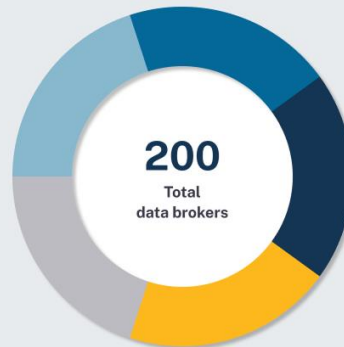
Check status and/or update your deletion request in 45 days

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 [?](#)

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.](#)

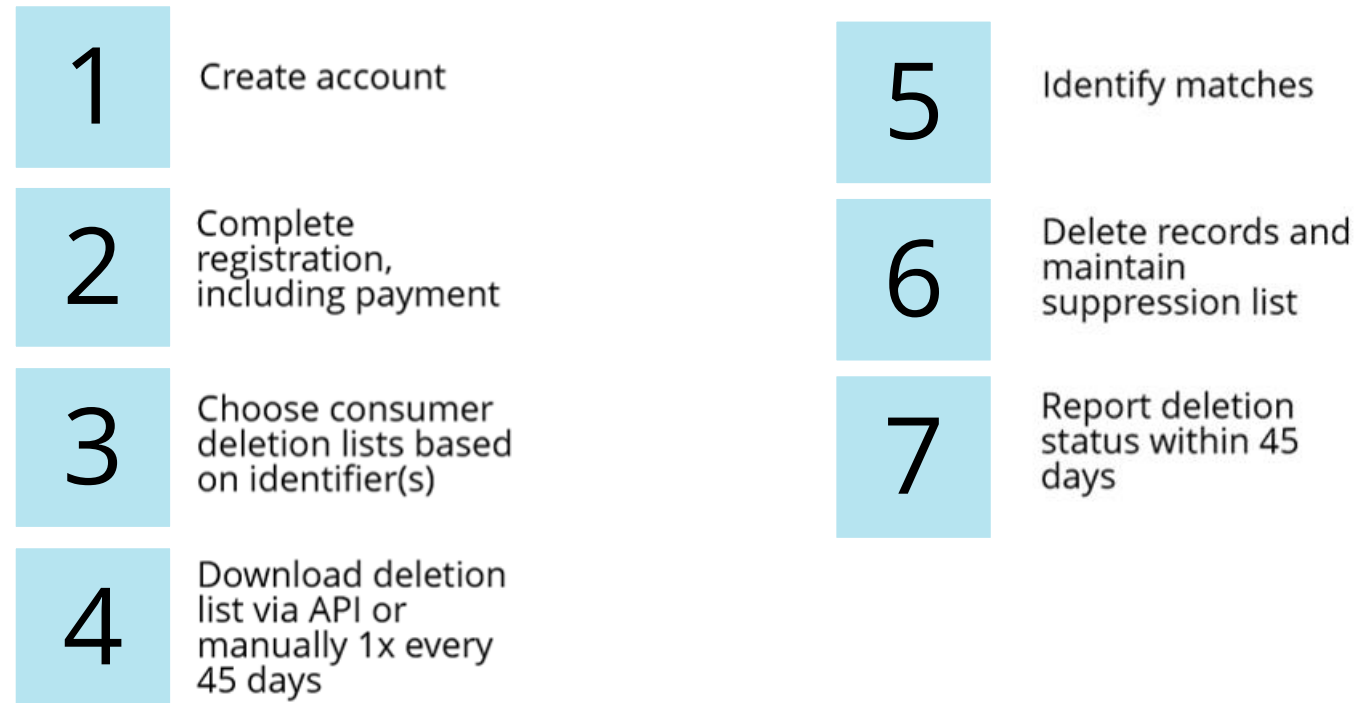
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DROP Preview: Data Broker Experience

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DROP System Overview: Data Broker Experience



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 ⓘ

Enter only digits

* Business email address

Ex. email@email.com

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

*Subject to change

*Subject to change

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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 >](#)

*Subject to change

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3

Choose consumer deletion lists based on identifier(s)

Data broker portal

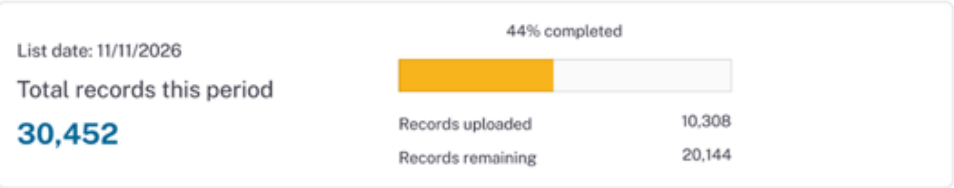
Data Broker 1

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.



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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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

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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5

Identify matches

6

Delete records and maintain suppression list

7

Report deletion status within 45 days

X

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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Timeline for DROP Launch

- **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

Multistate Action – Registries

Data Broker Registry Laws

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

Multistate Action – Delete

CA DELETE Act Amendment – SB 361

- Requires increased disclosures about data broker collection and sales practices
- Requires disclosure of what types of personal information a data broker collects (names, zip, email, MAID, VIN, etc.).

DELETE Act Style 2025 Bills

- Illinois (HB 2913) - did not make it out of committee
 - Similar to CA Delete Act
- Massachusetts (S 2619) - still moving (data broker provisions removed)
 - Comprehensive consumer privacy bill that originally included data broker registration and deletion mechanism
- Nebraska (LB 602) - did not make it out of committee
 - Similar to CA Delete Act
- Vermont (H 211) - did not make it out of committee
 - Included new registration and deletion mechanism requirements
 - Narrower entity and information coverage

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 Privacy. Security. Risk. 2025**
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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