


Appendix B – Compliance Checklist

IMPORTANT NOTE: This checklist provides general guidance on what dealerships need to have in place to fulfill the CPRA. Each of these items require a depth of knowledge and specific functionality that is not reflected here. For example, a “deletion request” needs to be verified and properly authenticated with three points of identification by the consumer before it can be properly processed and a “privacy policy” must have very specific disclosures. Please review the manual or contact our partners at [ComplyAuto](#) for more information.

Dealer Website		
#	Action	Notes
1	Cookie Consent Banner	Loading tracking or cross-contextual cookies on a Consumer’s device is considered a “sale” and therefore requires the Consumer’s consent prior to firing.
2a	Conspicuously place two specific links on the website AND at the header or footer	1. Link: <u>“Do Not Share or Sell My Personal Information,”</u> AND 2. Link: <u>“Limit the Use of My Sensitive Personal Information”</u>
OR		
2b	Conspicuously place link and opt-out icon adjacent to link at header or footer	1. Link: <u>“Your Privacy Choices”</u> AND 2. The following icon: 
3	California Privacy Policy	The privacy policy must have very specific disclosures as required by the CCPA as covered in <i>Section 8</i> .
4	Notice at Collection	The Notice at Collection provides the consumer, employee or job applicant with timely notice, at or before the time of collection, about the categories of personal information to be collected from them and the purposes for which the personal information is collected or used, and whether it is sold or shared.
5	Opt-Out Preference Signals	The dealer must enable a mechanism on the website to honor standardized opt-out preference signals, including Global Privacy Control (GPC).

Consumer Rights		
#	Action	Notes
1	Respond to a “Right to Know” request - Categories	The dealer must put two or more mechanisms in place to respond to these types of requests it receives both online and in-person. This means responding to the consumer, employee or job applicant within the statutory deadlines. This mechanism must properly notify downstream Service Providers, Contractors, and Third Parties if applicable.
2	Respond to a “Right to Know” request - Specific Pieces	The dealer must put two or more mechanisms in place to respond to these types of requests it receives both online and in-person. This means responding to the consumer, employee or job applicant within the statutory deadlines. This mechanism must properly notify downstream Service Providers, Contractors, and Third Parties if applicable.
3	Respond to a “Right to Delete” request	The dealer must put two or more mechanisms in place to respond to these types of requests it receives both online and in-person. This means responding to the consumer, employee or job applicant within the statutory deadlines. This mechanism must properly notify downstream Service Providers, Contractors, and Third Parties if applicable.
4	Respond to a “Right to Limit” request	The dealer must put two or more mechanisms in place to respond to these types of requests it receives both online and in-person. This means responding to the consumer, employee or job applicant within the statutory deadlines. This mechanism must properly notify downstream Service Providers, Contractors, and Third Parties if applicable.
5	Respond to a “Right to Opt-Out of Sale/Sharing” request	The dealer must put two or more mechanisms in place to respond to these types of requests it receives both online and in-person. This means responding to the consumer, employee or job applicant within the statutory deadlines and cannot require verification or authentication of the request. This mechanism must properly notify downstream Third Parties if applicable.
6	Respond to a “Right to Correct” request	The dealer must put two or more mechanisms in place to respond to these types of requests it receives both online and in-person. This means responding to the consumer, employee or job applicant within the statutory deadlines and cannot require verification or authentication of the request. This mechanism must properly notify downstream Service Providers, Contractors, and Third Parties if applicable.
7	Respond to a request by an Authorized Agent	The dealer must put a mechanism in place to verify the authorization as well as respond to the request as if it was made by the consumer, employee or job applicant themselves.

Disclosure Requirements		
#	Action	Notes
1	Privacy Policy	The privacy policy must have very specific disclosures as required by the CCPA.
2	Notice at Collection - Consumer (non-website)	<p>The Notice at Collection provides the consumer with timely notice, at or before the time of collection, about the categories of personal information to be collected from them and the purposes for which the personal information is collected or used, and whether it is sold or shared.</p> <p>“Timely notice at or before the time of collection” can be interpreted to suggest that any telephone calls made or emails or promotions sent to consumers should have the Notice at Collection present.</p>
3	Notice at Collection - Employee or Job Applicant (non-website)	<p>The Notice at Collection provides the employee or job applicant with timely notice, at or before the time of collection, about the categories of personal information to be collected from them and the purposes for which the personal information is collected or used, and whether it is sold or shared.</p> <p>“Timely notice at or before the time of collection” can be interpreted to suggest that any emails sent to employees or job applicants should have the Notice at Collection present. Additionally, any job postings should have this notice as well.</p>

Dealer Operations		
#	Action	Notes
1	Data Mapping and Systems Inventory	Dealers need to perform this in order to know how information flows through their organization and what is collected based on the consumer’s, employee’s or job applicant’s interaction(s) with the dealer. Additionally, this map allows the dealer to identify the business purpose of collecting the information and which categories of third parties it shares this with.

2	Vendor Management - Service Provider	Each of the dealer's Service Providers must sign a contract that prohibits the use of customer information in certain ways. The contract has very specific requirements. Additionally, the dealer must maintain this Service Provider library in order to know which Service Provider to notify if it fulfills a consumer's, employee's, or job applicant's request.
3	Vendor Management - Third Parties	Each of the dealer's Third Parties must sign a contract that only allows it to use personal information for specific purposes. The dealer must maintain this Third Party library in order to know which Third Party to notify if it fulfills a consumer's, employee's, or job applicant's request.
4	Employee Training	Train all consumer-facing employees on the CCPA annually to ensure that they know what to do if they receive a request from a consumer.
5	Record-keeping	The dealer must maintain records of consumer requests for at least twenty-four (24) months.
6	Security Standards	<p>In relation to this record-keeping requirement, the dealer must maintain reasonable security procedures and practices in maintaining the records.</p> <p>Additionally, dealers will be subject to civil liability by consumers if their non-encrypted and non-redacted personal information is subject to unauthorized access (i.e. a data breach).</p>
7	Verification and Authentication	The dealer must establish a reasonable method for verifying the identity of a consumer if the consumer submits a request to delete, request to correct, or request to know. Note that this verification is not applicable to requests to opt-out of sale/sharing nor to limit the use of sensitive information.