

# The Jaffe Update

Legal News Delivered

A publication of Jaffe Raitt Heuer & Weiss

February, 2020

## Compliance Obligations Under the California Consumer Privacy Act

The California Consumer Privacy Act (“CCPA”) went into effect on January 1, 2020 and imposes a number of obligations on companies that deal in consumers’ personal information, creating significant exposure if compliance is not achieved.

A company may be required to comply with the CCPA, even if it does not have a physical presence in California, if any of the following apply:

- Worldwide gross annual sales greater than \$25MM;
- 50% or more of worldwide annual revenue is derived from selling consumer personal information; or
- The company annually buys, sells, or shares/receives for commercial purposes, the personal information of 50,000 or more California consumers, households or devices.

Please keep in mind that the CCPA broadly defines the term “selling” to mean “selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic means, a consumer’s personal information to another business or a third party for monetary or other valuable consideration.”

The CCPA also broadly defines “personal information” to encompass “information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.” This includes not only the usual personal information categories such as names, addresses, Social Security numbers, and driver’s license numbers, but also additional categories such as IP addresses, purchasing or consuming histories, browsing history, and information regarding a consumer’s interaction with a website.

Jaffe’s Privacy & Data Security Team has significant experience in counseling clients through the process of establishing compliance with the CCPA. If you would like further information, please contact Jon Sriro ([jsriro@jaffelaw.com](mailto:jsriro@jaffelaw.com)), Katherine Stefanou ([kstefanou@jaffelaw.com](mailto:kstefanou@jaffelaw.com)), or Shaunte Wilcher ([swilcher@jaffelaw.com](mailto:swilcher@jaffelaw.com)).

*This summary is provided as an information service to our clients and friends. This summary is not intended, and should not be used, as legal advice or opinion.*



27777 FRANKLIN ROAD • SUITE 2500 • SOUTHFIELD, MICHIGAN 48034

PHONE: 248.351.3000 • FAX: 248.351.3082

SOUTHFIELD • DETROIT • ANN ARBOR

NAPLES

[www.jaffelaw.com](http://www.jaffelaw.com)