axiom

CCPA Checklist

Here are the actions you need take before CCPA goes live on January 1, 2020.

1. Current state analysis

- ☐ **Project mapping**
  - Interview internal privacy stakeholders, including CCO, CRO, CPO
  - Create organizational privacy vision
  - Structure privacy team, including members from both legal and operational departments

- ☐ **Review policies and customer communications**
  - Review existing privacy policies, customer communications, and privacy notices to identify needed updates
  - Identify outstanding policies

- ☐ **Map and inventory data**
  - Document all privacy-related information repositories and data lifecycle
  - Review systems and agreements with third-parties who have data access

2. Gap assessment and recommendation

- ☐ **Document gaps in policies, procedures, 3rd party data sharing agreements, training, privacy notices, and customer communications**

- ☐ **Create recommendation to close gaps**

- ☐ **Present recommendation to senior stakeholders**
  - Include proposed implementation plan and timeline

3. Implementation

- ☐ **Remedy gaps**
  - Address deficiencies in policies, training, and procedures such as DPIAs and DSARs
  - Implement "privacy by design" and "privacy by default" in all products and offerings

- ☐ **Update contracts as needed**
  - Repaper third-party contracts including data processing agreements

- ☐ **Train and communicate**
  - Draft an enterprise-wide communication plan to keep relevant parties updated on company readiness and response
  - Develop training plans customized for each department

4. Measure, maintain, and evolve

- ☐ **Determine key metrics to measure privacy program**
  - Define what "success" looks like for privacy program
  - Determine metrics to assess privacy program and how they will be collected

- ☐ **Monitor and respond**
  - Maintain privacy inbox and respond to consumer requests

- ☐ **Report to compliance regulators**

- ☐ **Iterate program as privacy legislation evolves**
  - Adjust program as interpretation and enforcement is clarified
  - Continue to update as business objectives evolve