

Notice at Collection (CCPA and CPRA)

by Practical Law Data Privacy & Cybersecurity

Status: **Law Stated as of December 31, 2022** | Jurisdiction: **California**

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A Standard Document notice at collection for use when an organization collects personal information from a California resident. This California-specific notice addresses requirements from the California Consumer Privacy Act of 2018 (CCPA) and its implementing regulations. It also addresses changes that the voter-approved California Privacy Rights Act of 2020 (CPRA) may require when it takes effect on January 1, 2023. This Standard Document has integrated notes with important explanations and drafting tips.

DRAFTING NOTE: READ THIS BEFORE USING DOCUMENT

This Standard Document provides a California-specific notice at collection required by the California Consumer Privacy Act of 2018 (CCPA) and the CCPA Regulations (Cal. Civ. Code §§ 1798.100 to 1798.199.95; Cal. Code Regs. tit. 11, §§ 7000 to 7102; see [Practice Note, Understanding the California Consumer Privacy Act \(CCPA\) and the California Privacy Rights Act \(CPRA\): Notice at Collection](#))).

The CCPA grants consumers, defined as California residents, new rights regarding their personal information and requires covered businesses to provide various privacy disclosures, including a notice before or when collecting an individual's personal information (Cal. Civ. Code § 1798.100(b); Cal. Code Regs. tit. 11, §§ 7010(b) and 7012). Given its expansiveness and broad reach, the CCPA is likely to significantly impact entities both inside and outside California that collect and process California residents' personal information.

On November 3, 2020, California voters approved the California Privacy Rights Act of 2020 (CPRA), a ballot initiative that will significantly amend and expand the CCPA. Most of the CPRA's substantive CCPA amendments do not take effect until January 1, 2023, so businesses should continue to follow the CCPA and CCPA Regulations while they prepare for the

CPRA's new requirements. For a broader discussion of the CCPA and CPRA, including which business must comply with it and its history, see [Practice Note, Understanding the California Consumer Privacy Act \(CCPA\) and the California Privacy Rights Act \(CPRA\)](#) and [Box: History of the CCPA and CPRA](#).

For more on the CCPA and CPRA's required consumer notices, including the notice at collection and privacy policy, see [Practice Note, Drafting CCPA and CPRA Notices and Privacy Policies](#). For the full list of CCPA and CPRA resources, see [California Privacy Toolkit \(CCPA and CPRA\)](#).

Legal Requirements

A covered business that collects personal information from a California resident must provide a notice at or before the point of collection (Cal. Civ. Code § 1798.100(b); Cal. Code Regs. tit. 11, §§ 7010(b) and 7012). This notice is separate and distinct from the business's CCPA privacy policy, which provides more extensive privacy disclosures (Cal. Code Regs. tit. 11, §§ 7010(a) and 7011; [California AG Final Statement of Reasons for CCPA Regulations \(CCPA FSOR\)](#) at 6 to 12, [California AG Initial Statement of Reasons for CCPA Regulations \(CCPA ISOR\)](#) at 8 to 10).

Notice at Collection (CCPA and CPRA)

While the CCPA establishes a generalized collection notice obligation, the CCPA Regulations provide the notice's specific framework, with detailed compliance requirements.

The business must provide the notice at collection any time it collects a California resident's personal information, including, for example, through:

- Online activities, such as by using cookies or other tracking methods that create individual profiles.
- Mobile or other internet-connected devices, such as collecting geolocation data from a phone or television viewing habits from a smart TV.
- Offline activities, such as collecting information on a paper form or by observing a consumer's physical behavior.
- Telephone conversations.

The CCPA Regulations clearly prohibit the surreptitious collection of personal information (Cal. Code Regs. tit. 11, § 7012(a)(1), (5), (6); [CCPA ISOR](#) at 9).

Unless the business provides the required notice, it cannot:

- Collect any personal information from that person.
- Collect undisclosed personal information categories.
- Use collected personal information for additional purposes.

(Cal. Civ. Code § 1798.100(b); Cal. Code Regs. tit. 11, § 7012(a)(5), (6).)

CPRA Revisions

The CPRA rephrases and expands the CCPA's collection notice requirements to require specific disclosures from a business that controls the collection of a consumer's personal information, at or before the point of collection (Cal. Civ. Code § 1798.100(a) (effective January 1, 2023); see [Drafting Note, CPRA Revisions: Required Notice Content](#)).

Businesses should expect the newly created California Privacy Protection Agency to issue new or revised regulations that provide more detailed compliance requirements (Cal. Civ. Code § 1798.185(a)(6), (22), (d)). For more on potential CPRA Regulations, see [CPRA Regulation Tracker](#).

As with the CCPA, the business cannot:

- Collect personal information or sensitive personal information categories not disclosed in a notice.
- Use the personal information or sensitive personal information it collects for additional purposes that are incompatible with the use purposes disclosed in the collection notice.

(Cal. Civ. Code § 1798.100(c) (effective January 1, 2023).)

The CPRA also prohibits retaining personal information or sensitive personal information for time periods longer than reasonably necessary for each disclosed collection purpose (Cal. Civ. Code § 1798.100(a)(3) (effective January 1, 2023)).

Required Notice Content

The CCPA notice at collection must provide:

- A list of the personal information categories collected (see [Drafting Note, Personal Information Categories](#)).
- The intended business or commercial use purpose for the personal information categories collected (see [Drafting Note, Business Purposes](#)).
- A link or website address to the business's opt-out right notice, if applicable (see [Practice Note, Drafting CCPA and CPRA Notices and Privacy Policies: Opt-Out Right Notice](#)).
- A link or website address to the business's privacy policy (see [Practice Note, Drafting CCPA and CPRA Notices and Privacy Policies: Privacy Policy and Standard Document, CCPA Privacy Policy for California Residents](#)).

(Cal. Code Regs. tit. 11, § 7012(b).)

CPRA Revisions: Required Notice Content

The CPRA expands the CCPA's required disclosures to add:

- The sensitive personal information categories collected (see [Drafting Note, CPRA Revisions: Sensitive Personal Information Categories](#)).
- The intended use or collection purposes for the sensitive personal information categories (see [Drafting Note, CPRA Revisions: Business Purposes](#)).
- Whether the business may sell the personal information or sensitive personal information collected or share it for cross-context behavioral

advertising purpose (see Drafting Note, CPRA Revisions: Personal Information Sales and Sharing).

- The intended retention period for each personal information or sensitive personal information category, or the criteria used to determine the relevant retention period (see Drafting Note, CPRA Revisions: Retention Period).

(Cal. Civ. Code § 1798.100(a) (effective January 1, 2023).)

Exceptions and Special Considerations

The CCPA Regulations provide two exceptions for collection notices:

- When collecting information from a California-based job applicant, employee, owner, director, officer, medical staff member, or contractor (Workforce Members) (see Drafting Note, Workforce Members).
- For certain indirect data collections (see Drafting Note, Data Brokers).

They also set additional requirements when the business collects information from mobile devices (see Drafting Note, Mobile Devices).

Workforce Members

Amendments passed in 2019 and the CPRA temporarily exempt certain employment-related personal information from most CCPA requirements, including an individual's personal information sales opt-out right or right to know about their personal information. However, employers must still provide the CCPA's required collection notice that describes the personal information categories collected and expected use purposes. (Cal. Civ. Code §§ 1798.100(b) and 1798.145(h).) Until this exception expires on January 1, 2023, the CCPA Regulations exempt employment-related collection notices from containing the last two elements that other collection notices must include, namely links or website addresses to the business's:

- Opt-out right notice.
- Privacy policy.

(Cal. Code Regs. tit. 11, § 7012(f), (g); [CCPA FSOR](#) at 12.)

Employment-related information includes personal information collected or used about a Workforce Member:

- Solely within the context of that person's role.
- For that person's emergency contact information.
- To administer that person's employee benefits.

(Cal. Civ. Code § 1798.145(h)(1); Cal. Code Regs. tit. 11, § 7001(i).)

For more on this exception and the CCPA's requirements for employers, see [Practice Note, California Privacy Laws \(CCPA and CPRA\): Impact on Employers](#).

For model employment-related notices at collection, see [Standard Documents, CCPA Notice at Collection for California Employees and Applicants](#) and [CCPA Notice at Collection for California Independent Contractors](#).

Data Brokers

Many businesses, for example data brokers, collect personal information about individuals from third-party sources instead of directly from the individual, making it more difficult for them to provide the required collection notice. To ease this burden, the CCPA Regulations exempt a business from the collection notice requirement if it either:

- Does not sell the consumer's personal information.
- Is a data broker that:
 - registered with the California AG (see [Practice Note, California Privacy and Data Security Law: Overview: Data Broker Registration](#)); and
 - provided a personal information sales opt-out instruction link with its registration submission (see [OAG: Data Broker Registration](#) and [OAG: Data Broker Registry](#)).

(Cal. Code Regs. tit. 11, § 7012(d), (e); [CCPA FSOR](#) at 11 to 12.)

Otherwise, the business must provide the consumer with a collection notice before or at the point it collects information about that person from the third-party source.

Mobile Devices

Collecting information from a consumer's mobile device requires an extra "just-in-time" notice summarizing the personal information categories collected and a link to the full collection notice whenever the information collected or the intended use purpose is one the consumer is not likely to

reasonably expect (Cal. Code Regs. tit. 11, § 7012(a)(4); [CCPA FSOR](#) at 8 to 9).

For example, consumers would not reasonably expect a flashlight application to need or collect geolocation information. The flashlight app collecting this unexpected information must therefore:

- Provide a just-in-time notice when the user opens the application, such as with a pop-up window.
- Disclose its collection of geolocation information and provide a link to the business's full collection notice.

(Cal. Code Regs. tit. 11, § 7012(a)(4).)

CPRA Revisions: Third Party Collection Notices

Providing collection notices can prove difficult when the business does not have a direct relationship with the consumer or when the business collects personal information indirectly, such as by observing consumer behavior. Recognizing this tension, the CPRA allows a business that acts as a third party when it controls the collection of a consumer's personal information to meet its collection notice obligation by prominently and conspicuously providing the required information on its internet website's homepage (Cal. Civ. Code § 1798.100(b) (effective January 1, 2023)).

However, if that personal information collection occurs on the business's premises, including in a vehicle, the business acting as a third party must also provide the consumer with an additional notice that:

- Occurs:
 - at the collection location;
 - in a clear and conspicuous manner; and
 - at or before the point of collection.
- Informs the consumer about:
 - the personal information categories it will collect;
 - the use purposes for the collected personal information categories; and
 - whether it sells that personal information.

(Cal. Civ. Code § 1798.100(b) (effective January 1, 2023).)

Under the CPRA's revised definitions, a business acts as third party when:

- The consumer is not intentionally interacting with the business.

- The business is not:
 - collecting the information as part of the consumer's current interaction with it;
 - a service provider to another business with whom the consumer intentionally interacts and who collects the personal information as part of the consumer's current interaction with that business; or
 - a contractor.

(Cal. Civ. Code § 1798.140(ai) (effective January 1, 2023).)

For more on service providers, contractors, and third parties under the CPRA, see [Practice Note, Understanding the California Consumer Privacy Act \(CCPA\) and the California Privacy Rights Act \(CPRA\): Definitions for Third Party, Restricted Third Party, and Service Provider](#).

Notice Presentation and Format

The CCPA and CCPA Regulations do not require a set notice format or presentation manner, as businesses use a wide variety of methods to collect personal information. Instead, they set a flexible standard requiring the business to ensure the chosen design is both:

- Easy for consumers to read and understand.
- Readily available where consumers encounter it before or at the point of collection.

(Cal. Code Regs. tit. 11, § 7012(a)(2), (3); [CCPA FSOR](#) at 7.)

Under the CCPA Regulations, the notice must:

- Use plain, straightforward language and avoid technical or legal jargon.
- Use a format that draws attention to the notice and makes it readable, including on smaller screens, if applicable.
- Translate the notice, if applicable, so it appears in the language the business ordinarily uses to provide sales announcements, contracts, disclaimers, or other information to California-based consumers.
- Ensure consumers with disabilities can reasonably access the notice by, for example:
 - following generally recognized industry standards, such as the Web Content Accessibility Guidelines published by the World Wide Web Consortium for online notices (see [W3: Web Content Accessibility Guidelines \(WCAG\) Overview](#)); or

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- for other contexts, describing how a consumer with a disability may access the policy in an alternative format.

(Cal. Code Regs. tit. 11, § 7012(a)(2)(A) to (D); [CCPA FSOR](#) at 7 to 8.)

Ensuring consumers readily encounter the notice at or before the point of collection requires businesses to consider both:

- Temporal proximity to the collection action, such as for online data captures.
- Physical proximity to the collection point, such as near an in-store cash register where the collection takes place.

([CCPA FSOR](#) at 4 and 6.)

To help businesses put these obligations into context, the CCPA Regulations provide several examples of appropriate collection notices for different business circumstances. When a business collects a consumer's personal information:

- Online, it may post a conspicuous link to the collection notice on both:
 - the website's home page; and
 - all webpages that collect personal information.
- By using a mobile app, it may provide a link to the collection notice on both:
 - the mobile app's download page; and
 - the app's settings menu.
- Offline, it may:
 - add the notice to printed forms that collect personal information;
 - provide a paper notice to the consumer; or
 - post prominent signage directing the consumer to an online link for the notice.

- On the telephone, it may provide the notice orally.

(Cal. Code Regs. tit. 11, § 7012(a)(3)(A) to (D); [CCPA FSOR](#) at 8.)

Special Rule for Online Collections

While the collection notice is different from the business's general privacy policy, the CCPA Regulations do permit a business that collects personal information online to embed the required collection notice in its privacy policy if both:

- The website collection point provides a direct link to a specific collection notice section within the general privacy policy.
- That section contains all the information on the website's collection activities in the same manner required for a compliant notice at collection.

(Cal. Code Regs. tit. 11, § 7012(c); [CCPA ISOR](#) at 9.)

Assumptions

This collection notice assumes that the CCPA and CPRA applies to the business and that the collection notice is not directed toward employees, applicants, or independent contractors. For employment-related collection notices, see [Standard Documents, CCPA Notice at Collection for California Employees and Applicants](#) and [CCPA Notice at Collection for California Independent Contractors](#).

Bracketed Items

Complete bracketed items in ALL CAPS with the specific and relevant facts. Bracketed items in sentence case are either optional provisions or include alternative language choices that the drafting party should select, add, or delete in its discretion.

Notice at Collection

[COMPANY NAME] is collecting your personal information [and sensitive personal information] to support its business operations, including for [the following purposes: [BUSINESS PURPOSES LIST]/the business purposes listed in the chart below].

DRAFTING NOTE: BUSINESS PURPOSES

The collection notice must disclose the business or commercial purposes for which personal information collected will be used (Cal. Civ. Code § 1798.100(b); Cal. Code Regs. tit. 11, § 7012(b)(2); [CCPA FSOR](#) at 10).

The CCPA's purpose limitation clause prohibits using collected personal information for purposes not listed in the notice or uses unrelated to those purposes (Cal. Civ. Code § 1798.100(b)). Therefore, the business should ensure that the notice comprehensively describes both current and reasonably anticipated use cases.

When describing the business's use purposes, the drafter should carefully review how and why the business uses the specific personal information connected to the disclosure notice to provide clear, comprehensive, and accurate disclosures.

For more on the CCPA's business purpose definition, see [Practice Note, Drafting CCPA and CPRA Notices and Privacy Policies: Business or Commercial Purpose](#). For more on describing business purposes and additional draft language, see [Standard Document, CCPA Privacy Policy for California Residents: Use of Personal Information](#).

For more on potential employment-related use purposes, see [Practice Note, California Privacy Laws \(CCPA and CPRA\): Impact on Employers](#).

CPRA Revisions: Business Purposes

The CPRA broadens the collection notice's purpose disclosure requirement to include the new sensitive personal information category (Cal. Civ. Code §§ 1798.100(a)(1), (2) and 1798.140(ae) (effective January 1, 2023)). For more on the CPRA's sensitive personal information definition, see [Drafting Note, CPRA Revisions: Sensitive Personal Information Categories](#) and [Practice Note, Understanding the California Consumer Privacy Act \(CCPA\) and the](#)

California Privacy Rights Act (CPRA): CPRA Revisions: New Sensitive Personal Information Category.

To meet the CPRA's requirements, the business should include the optional language for sensitive personal information whenever it is collected and tailor its business purpose description to directly address the sensitive personal information collected.

The CPRA also slightly revises the language of the CCPA's purpose limitation clause, limiting personal information use, collection, retention, and sharing to actions reasonably necessary and proportionate to achieve the collection purpose or another disclosed purpose compatible with the personal information collection's context (Cal. Civ. Code § 1798.100(c) (effective January 1, 2023)). It also slightly revises the CCPA's business purpose definition (Cal. Civ. Code § 1798.140(e) (effective January 1, 2023)). For more on the CPRA's business purpose revisions, see [Practice Note, Understanding the California Consumer Privacy Act \(CCPA\) and the California Privacy Rights Act \(CPRA\): CPRA Revisions: Business Purposes](#).

Businesses should ensure the disclosed use purposes meet the CPRA's stronger purpose limitation requirements.

Combined Disclosure or Category-Specific Disclosure

While the CPRA's statutory language does not clearly require a business to provide category-by-category breakdowns for the use purposes disclosures, businesses should consider providing them for better transparency. A business choosing this format should select the alternate text for listing the business purposes in the chart below. The California Privacy Protection Agency may issue regulations that provide additional clarity on how businesses should present the CPRA's collection notice disclosures (see [CPRA Regulation Tracker](#)).

[We [will not] sell the personal information we collect. [We also/However, we] [will not] share it with third parties for cross-context behavioral advertising.] [We [will not] sell the sensitive personal information we collect. [We also/However, we] [will not] share it with third parties for cross-context behavioral advertising.] To opt-out of personal

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information sales [or sharing,]visit [OPT-OUT NOTICE URL]. To view our full privacy [policy/notice], visit [PRIVACY POLICY URL].

DRAFTING NOTE: PERSONAL INFORMATION SALES

The collection notice must provide a link or website address to the business’s opt-out right notice if the business sells personal information (Cal. Code Regs. tit. 11, § 7012(b)(3)). It must also include a link to the business’s privacy policy (Cal. Code Regs. tit. 11, § 7012(b)(4)).

CPRA Revisions: Personal Information Sales and Sharing

The CPRA requires the collection notice to directly disclose whether the business sells the personal information or sensitive personal information collected

or shares it for cross-context behavioral advertising purposes (Cal. Civ. Code §§ 1798.100(a)(1), (2) and 1798.140 ah) (effective January 1, 2023)). To meet the CPRA’s requirements, the business should either include the optional sales/sharing disclosure sentences here or provide a category-by-category sales/sharing disclosure in the table below. The sales/sharing disclosures here contain optional and alternate language to account for situations where the business sells and shares personal information, does not sell or share personal information, sells but does not share personal information, and does not sell but does share personal information.

We may collect the personal information [and sensitive personal information] categories listed in the table[s] below. [We do not collect sensitive personal information.] The table[s] also list[s], for each category, [our expected retention period] [,/and] [use purposes][,/and] [whether we sell the information or share it with third parties for cross-context behavioral advertising].

Personal Information Category	[Retention Period]	[Business Purpose]	[Sold or Shared]
[Identifiers]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]
[California Customer Records personal information]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]
[Protected classification characteristics under California or federal law]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]
[Commercial information]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]
[Biometric information]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]
[Internet or other similar network activity]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]
[Geolocation data]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]
[Sensory data]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]

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Personal Information Category	[Retention Period]	[Business Purpose]	[Sold or Shared]
[Professional or employment-related information]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]
[Non-public education information]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]
[Inferences drawn from other personal information]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]
[OTHER PERSONAL INFORMATION DESCRIPTION]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]

[

Sensitive Personal Information Category	[Retention Period]	[Business Purpose]	[Sold or Shared]
[Government identifiers (social security, driver's license, state identification card, or passport number)]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]
[Complete account access credentials (user names, account numbers, or card numbers combined with required access/security code or password)]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]
[Precise geolocation]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]
[Racial or ethnic origin]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]
[Religious or philosophical beliefs]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]
[Union membership]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]
[Genetic data]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]
[Mail, email, or text messages contents not directed to us]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]
[Unique identifying biometric information]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]
[Health, sex life, or sexual orientation information]	[RETENTION PERIOD]	[USE PURPOSES]	[No/Sold/Shared/Sold and Shared]

]

DRAFTING NOTE: PERSONAL INFORMATION CATEGORIES

The CCPA Regulations require the collection notice to use personal information category descriptions that provide consumers with a meaningful understanding of the information collected (Cal. Code Regs. tit. 11, § 7012(b)(1)). The CCPA provides 11 specific categories of personal information (Cal. Civ. Code §§ 1798.140(o)(A) to (K)). Unlike other required notices, such as the privacy policy or individual request to know responses, a business is not required to use these specific category descriptions in the collection notice (Cal. Civ. Code § 1798.130(c)). However, a business may draw on them for its collection notice disclosures as long as they provide consumers with a clear understanding of the information collected.

This notice lists a short description of the CCPA's 11 statutory personal information categories as optional text. When drafting the notice, the business should select the information categories that most closely match the specific information collected and provide any additional descriptions needed to clearly inform consumers about the collection's scope. As a best practice, online collection notices should hyperlink each personal information category listed to a more detailed description with examples of the personal information covered.

For a table providing detailed descriptions and examples of the CCPA's 11 personal information categories, see [Standard Document, CCPA Privacy Policy for California Residents: Information We Collect](#).

CPRA Revisions: Sensitive Personal Information Categories

The CPRA adds a new sensitive personal information category and broadens the collection notice requirement to include separate disclosures for any sensitive personal information categories collected (Cal. Civ. Code § 1798.100(a)(2) (effective January 1, 2023)). The new definition provides nine specific sensitive information categories that, while not required, the business should use for the collection notice disclosure (Cal. Civ. Code § 1798.140(ae) (effective January 1, 2023)). For more on when

personal information qualifies as sensitive under the CPRA, see [Practice Note, Understanding the California Consumer Privacy Act \(CCPA\) and the California Privacy Rights Act \(CPRA\): CPRA Revisions: New Sensitive Personal Information Category](#).

To meet the CPRA's requirements, the business must include the optional sensitive personal information language and table whenever it is collected. For clarity, if the business does not collect sensitive personal information, it should include the optional sentence stating that it does not.

CPRA Revisions: Retention Period

The CPRA requires the business to provide the length of time it intends to retain each personal information and sensitive personal information category. If providing the exact retention period is not possible, the business may instead describe the criteria it will use to determine how long it plans to retain that personal information or sensitive personal information category. When setting the retention period, the business should remember that the CPRA prohibits it from retaining a consumer's personal information for longer than is reasonably necessary to achieve the disclosed collection and use purposes (Cal. Civ. Code § 1798.100(c) (effective January 1, 2023)).

To meet the CPRA's requirements, the business must include the optional retention period column.

CPRA Revisions: Optional Business Purpose and Sales or Sharing Columns

While a CPRA collection notice must disclose the business's collection and use purposes and whether it sells or shares the collected information, it does not clearly require a category-by-category breakdown for those disclosures (Cal. Civ. Code § 1798.100(a)(1), (2) (effective January 1, 2023)). However, presenting this required information in a table format provides better

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transparency and clarity. A business that chooses to provide category-by-category disclosures should include the optional table columns for business purposes and the sales/sharing disclosure.

The California Privacy Protection Agency may issue regulations that provide additional clarity on how businesses should present the CPRA's collection notice disclosures (see [CPRA Regulation Tracker](#)).

If you have any questions about this Notice or need to access it in an alternative format due to having a disability, please contact [COMPANY EMAIL ADDRESS] [and] [COMPANY PHONE NUMBER].

[EFFECTIVE DATE]

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