

Integrity Advocate & CCPA

Introduction:

The CCPA regulations govern compliance with the California Consumer Privacy Act. They provide guidance to businesses on how to inform consumers of their rights under the CCPA, how to handle consumer requests, how to verify the identity of consumers making requests, and how to apply the law as it relates to minors.

Purpose & Scope of CCPA



The California Consumer Privacy Act of 2018 (CCPA) gives consumers more control over the personal information that businesses collect about them and the CCPA regulations provide guidance on how to implement the law. This landmark law secures new privacy rights for California consumers, including:

- The right to know about the personal information a business collects about them and how it is used and shared;
- The right to delete personal information collected from them (with some exceptions);
- The right to opt-out of the sale of their personal information; and
- The right to non-discrimination for exercising their CCPA rights.

Businesses are required to give consumers notices explaining their privacy practices. The CCPA applies to many businesses, including data brokers.

The CCPA applies to for-profit businesses that do business in California and **that have a gross annual revenue of over \$25 million.**

Integrity Advocate although not falling into this criteria exceeds compliance with the CCPA due to its adherence to Privacy by Design principles.



Principle	Requirement	How Integrity Advocate Complies
RIGHT TO KNOW	Users have the right to know what personal information a business collects about them and how it is used and shared. CCPA allows users to request that businesses disclose the personal information collected, used, shared, or sold about a user, and why they collected, used, shared, or sold that information.	Integrity Advocate provides this transparency without any action on behalf of user. In fact, Integrity Advocate has an integrated process that provides all users with a copy of retained data, our review findings and reviewer notes to allow them to verify data accuracy and the conclusions drawn from the processing of their data.
RIGHT TO DELETE	Users have the right to request that businesses delete personal information they collected from the user and to tell their service providers to do the same.	By default, Integrity Advocate deletes all unnecessary data i.e., data not required to illustrate who participated in the event and/or to support any rule violations identified. The limited data retained is deleted after 24 months, unless otherwise stipulated based on a client/regulatory requirement. Residual data is deleted at 2 years or earlier upon request.
RIGHT TO OPT OUT	Users may request that businesses stop selling your personal information (“opt-out”). With some exceptions, businesses cannot sell personal information after they receive an opt-out request unless the user later provides authorization allowing them to do so again. Businesses must wait at least 12 months before asking a user to opt back into the sale of your personal information.	<u>At no point</u>, has Integrity Advocate ever sold/ shared / transferred personal information to a third-party. In fact, Integrity Advocates privacy policy explicitly indicates that the users own their personal data, and it cannot be sold under any conditions.
RIGHT TO NON-DISCRIMINATION	Businesses cannot deny goods or services, charge a user a different price, or provide a different level or quality of goods or services just because you exercised your rights under the CCPA.	As all users are provided <u>all</u> of the rights enforced by CCPA by default there is no potential of discrimination.



Conclusion

The challenge to online services providing participation monitoring and proctoring services is to enable the best possible user experience, robust integrity controls and balance it with the required privacy protection for learners. Integrity Advocate's demonstrated compliance with CCPA allows organizations to utilize our services with the confidence.