

QS-281-2 CONSUMER PRIVACY POLICY/CCPA AND OTHER PRIVACY REGULATIONS

Policy Area	IT Policy Library
Approved Date	May 24, 2021
Approved By	John Roberts Security Steering Committee
Effective Date	May 24, 2021
Current Version	1.0
Policy Scope	All Policies, Procedures, Standards and Guidelines are based on SOC 2, HITRUST, NIST frameworks.

I. OVERVIEW

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;
- The right to non-discrimination for exercising their CCPA rights.
- Businesses are required to give consumers certain notices explaining their privacy practices. The CCPA applies to many businesses, including data brokers.

Other states are following the guidelines of CCPA and enacting similar privacy protection regulations for consumers. This policy follows the guidelines as defined in the CCPA, but applies to all states that have consumer protection regulations.

II. PURPOSE

Establishing a policy regarding regulations and requirements for responding to consumer requests to control their personal information in the state of California, as well as other states, identifies guidelines that will be followed in the event of a request from a consumer to control their personal information.

Personal information includes:

- Credit card numbers
- Postal addresses
- Demographics
- Browsing history and search history
- Commercial information
- Education information
- Unique personal identifier / account name / online identifier
- Geolocation data
- Real names
- Social security numbers
- Income or similar information
- Age
- Political affiliations
- Religions affiliations
- Driver's license number
- Biometric information



- IP address or other device similar identifiers
- Other identifiable information
- Passport number

CCPA grants the private consumer specific rights:

- Right to Know
- Right to Deletion
- Right to Opt Out
- Right to Anti discrimination
- Required Notices

CCPA applies to companies and organizations:

- \$25+ million in annual revenue;
- buys or sells, OR receives or shares for business's commercial purpose, PI of 50,000+ consumers, households or devices;
- or derives at least 50% of annual revenue from selling consumer PI.

III. SCOPE

This policy applies to all Staff responsible for processing and/or handling personally identifiable information.

In the event that a consumer contacts the John Roberts Company for issues regarding how their data is being used, our sole responsibility is to inform our client that provided the mailing list.

We are required by client contract, or our internal data retention policy, to delete the PII from our system. As a result, depending on how quickly the consumer contacts us, we may not be able to confirm that we have, or had at any time, any PII on the person with the inquiry.

IV. POLICY

Data brokers collect information about consumers from many sources including websites, other businesses, and public records. The data broker analyzes and packages the data for sale to other businesses.

By definition, The John Roberts Company is not a data broker, but a processor of data received from clients that may employ data brokers for mailing lists that are processed for mailing printed material. It is possible that a private consumer may contact The John Roberts Company directly, for a request to take a specific action regarding how their data should be handled. The John Roberts Company's sole responsibility will be to contact the client directly responsible for the consumer's request, and how to communicate with the private consumer regarding his or her request. The contact email address: JRDataPrivacy@johnroberts.com will be furnished to the consumer to provide the additional information necessary for John Roberts staff to initiate dialog between the consumer and our client.

V. ENFORCEMENT

Any Staff found to have violated this policy may be subject to disciplinary action, up to and including termination.

VI. DISTRIBUTION

This policy is to be distributed to THE JOHN ROBERTS Company Executive Management, Department Heads, IT Director, Risk Management Officer, and Chief Security Officer.

Policy History

Version	Date	Description	Approved By
1.0	5/24/2021	Initial policy release	Mark Karaffa

All security documents are reviewed and updated, if necessary, annually by one or more members of the JR Security Steering Committee. (QS-229-2)